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Under the HOPE II Legislation
Haiti

REPORTING PERIOD

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List of Acronyms

ADIH	Association des Industries d'Haïti (Haitian Industry Association)
BMST	Bureau de la Médiatrice Spéciale du Travail
CAOSS	Conseil d'Administration des Organes de Sécurité Sociale (Board of Social Security Bodies)
CP	Compliance point
CSS	Conseil Supérieur des Salaires (Wages High Council)
CTMO-HOPE	Commission Tripartite de Mise en œuvre de la loi HOPE
EA	Enterprise Advisor
HELP	Haiti Economic Lift Program
HOPE	Haitian Hemispheric Opportunity Through Partnership Encouragement Act
ITUC	International Trade Union Confederation
MSDS	Material Safety Data Sheet
MAST	Ministère des Affaires Sociales et du Travail (Ministry of Labor and Social Affairs)
OFATMA	Office d'Assurance de Travail, de Maladie et de Maternité (Office for Work, Health and Maternity Insurance)
ONA	Office Nationale d'Assurance Vieillesse (National Office for Old-Age Insurance)
OSH	Occupational safety and health
PAC	Project Advisory Committee
PIC	Parc Industriel de Caracol
PICC	Performance Improvement Consultative Committee
PIM	Parc Industriel Métropolitain (also referred to as SONAPI)
PPE	Personal Protective Equipment
SC/AFL-CIO	Solidarity Center/American Federation of Labor - Congress of Industrial Organizations
TDS	Social Dialogue Table (Table de Dialogue Social)
TAICNAR	Technical Assistance Improvement and Compliance Needs Assessment and Remediation
USDOL	United States Department of Labor



Section I: Introduction and Context

1.1. BACKGROUND

Better Work – a collaboration between the United Nations’ International Labour Organization (ILO) and the International Finance Corporation (IFC), a member of the World Bank Group – is a comprehensive program bringing together all levels of the garment industry to improve working conditions and respect of labor rights for workers, and boost the competitiveness of apparel businesses. The program was launched in Haiti in June 2009 as part of the global Better Work program with country operations in Bangladesh, Cambodia, Haiti, Indonesia, Jordan, Nicaragua, and Vietnam. To date, Better Work is focusing its efforts on the apparel and footwear industry in the countries it operates in. However, companies from other industries may benefit from Better Work services in some particular country contexts.¹ In Haiti, the program is mandatory for all apparel producers exporting their products to the US market under the HOPE II legislation.

The HOPE II law requires that Haiti in cooperation with the ILO establishes a Technical Assistance Improvement and Compliance Needs Assessment and Remediation Program (TAICNAR) which (i) assesses Haitian apparel factories exporting under the HOPE II law on compliance with international core labor standards and national Haitian labor law, (ii) assists these factories on their remediation efforts and (iii) provides capacity building to the Government of Haiti on these aspects. According to the HOPE legislation, biannual reports have to be published to state enterprise level compliance performance. Further details on the components of the HOPE II law as well specific requirements with regards to biannual reports being published by the entity operating the TAICNAR program are quoted in annex 1 (HOPE II Legislation Reporting Requirements). This is the second of these two annual reports under the HOPE legislation to be published in 2018. Detailed enterprise level data of compliance performance as required by the HOPE II legislation is included in the factory tables in annex 4.

The two components of HOPE II’s TAICNAR program aim at strengthening labor compliance of the industry in Haiti. The first of these elements focuses on assessing compliance with core labor standards and national labor law, supporting remediation efforts, and publicly reporting on the progress of each

¹ In Haiti for example, a plastics factory is participating voluntarily in the program by paying a market price for the Better Work services.



factory on the Labor Ombudsman's register. The second element of the TAICNAR program consists of technical assistance to strengthen the legal and administrative structures for improving compliance in the industry. The scope of these services is extensive, encompassing technical assistance from the ILO in reviewing national laws and regulations to bring them into conformity with international standards, raising awareness of workers' rights, and training labor inspectors, judicial officers and other government personnel.

To encourage compliance with core labor standards and national labor law, the legislation indicates that preferential treatment may be withdrawn, suspended, or limited by the President of the United States from producers who – even after assistance has been provided – fail to come into compliance with the core labor standards and national labor law that is related and consistent with those standards. Removal of benefits is based on determinations made by the government of the United States, based primarily on non-compliance identifications made by the U.S. Department of Labor (USDOL). While Better Work Haiti reports are consulted as USDOL carries out its mandate to implement HOPE II, Better Work Haiti non-compliance findings cannot, on their own, serve to impact preferential treatment under the HOPE Act.

Better Work Haiti has been implementing the first component of the TAICNAR program from 2009 until 2017 while other ILO projects, in particular the ILO-MAST capacity building project worked on the second component. As of 2018 with the start of the third phase of the Better Work Haiti project (2018 - 2022), Better Work will also take on several elements of the second component of the TAICNAR program while continuing carrying out activities covering TAICNAR component one. The Better Work program is coordinating its work with the Labor Ombudsman and a tripartite Project Advisory Committee (PAC). This committee meets with Better Work on a regular basis to discuss the activities of the Better Work program. The members of the PAC represent the private sector, government and worker representatives and the Committee is chaired by the Labor Ombudsperson in line with the requirements of the HOPE law.

1.2. COUNTRY CONTEXT AND INDUSTRY UPDATES

President Moïse set an ambitious reform agenda for the new government. The focus lies on the following seven priority areas: State reform and political stability; investments; agricultural production and the environment; energy, road and port infrastructure; water and sanitation infrastructure; education; and promoting stability through social projects. Moïse also called for better alignment of international assistance to Haiti with national priorities.



During the reporting period, several political and socio-economic demonstrations took place in Haiti due to various issues.

The announcement of cuts to gasoline subsidies in Haiti in July fueled violent street protests and led to the resignation of the Prime Minister and his cabinet. The resurgence of the Petro Caribe funds issue in national debates has also fuelled protests and heightened tensions. The new Prime Minister, Jean-Henry Céant, and his cabinet were installed in September.

Total export revenues from the textile and garment industry in Haiti continue to account for approximately 90% of national export earnings and 10% of national GDP.

Since the expansion of tariff benefits under the HOPE/HELP preference programs, apparel exports from Haiti to the US have more than doubled, growing from US\$ 412.4 million in 2008 to a high of US\$ 895.3 million in 2015. In 2016 and 2017, Haitian apparel exports to the US showed a slight decrease to US\$848.7 million and 865 million respectively.

The apparel industry is also among the largest employers within Haiti, creating jobs for approximately 52,000 people according to data from August 2018 from the employers association ADIH. The workforce in this industry therefore saw a growth of roughly 20 percent since January 2017 when this figure still stagnated at 40,000 (since mid-2015). Most workers (about 65-70%) are women who support several family members. It has to be noted that ADIH includes management staff in these calculations. Based on Better Work's data collection over more than six years in Haiti's apparel industry, one can say that management staff accounts for approximately 10-15% in the factories. Therefore, the number of production workers lies at around 42,000-47,000. ADIH continues to update these figures based on statistics provided by its member companies several times a year. Currently, the biggest companies in the sector remain S&H Global and CODEVI which together employ approximately 20,000 workers. Both are located in Haiti's North East. 31 exporting factories are currently registered with BWH with three of them being newly registered facilities for which no data is included in this report yet. There are also strong indications that a number of new investors are planning to start operations in Haiti in the near future. More and more foreign direct investment is being put in the garment sector, especially from groups that also have facilities in other countries in the region, especially in Central America.

There continues to be a general trend in shift of production from the capital in Port-au-Prince to the North of the country. The combined workforce of the factories in the North represents now almost 45 per cent of the total employment in the sector.



Tensions in the garment sector around the minimum wage and other concerns by the union movement added to the overall politically volatile situation in Haiti in the reporting period. Various governments have updated their website's travel information reflecting this security situation. The UN continues to call its members to exert caution and be particularly vigilant during this period of political instability. Demonstrations and sporadic civil unrest cause frictions in country. Road blocks and frequent restrictions of movement continue to impact the daily lives of the population.

The second quarter saw several protests of workers requesting the Government to publish the new minimum wage. Workers were requesting an increase to 1000 Gourdes from the current level of 350 Gourdes per 8 hours of work.

Overall, the unions made the following demands to the government and the employers:

1. Minimum wage of 1000 Gourdes to be announced by presidential decree;
2. No increase of production quotas in garment factories to be mentioned in minimum wage decree;
3. Budgeting of social services for the new fiscal year including social housing, transportation and food subsidies;
4. Resuming the labor law reform process;
5. Increase the HTG 60,000 threshold for non-payment of taxes for earnings under this amount to HTG 125,000;
6. Improvement of social security services by the two social security institutions ONA and OFATMA;
7. Reinstatement of dismissed workers in several factories;
8. For the government to provide the social benefits promised (Transportation, housing and food);
9. Legitimate representativity of the trade unions in the tripartite councils (CSS, CAOSS)
10. MAST to abide by the HOPE LAW and play role as authority with the private sector.

During the time of writing this report, the Government published the new minimum wage which for the garment sector increased from 350 to 420 Gourdes per eight hours or work.



Section II: Highlights from the Reporting Period

Over the past months, Better Work continued delivering core services – assessment, advisory and training services – to all participating factories. In addition, Better Work continued its partnerships with various other actors to move specific projects forward in the garment industry in Haiti. Highlights from the reporting period include:

- ◆ The Productivity Accelerator project continues to be implemented in Haiti and Nicaragua. Regular advisory visits by the team of experts were conducted in both countries on a biannual basis. The volatile situation in Haiti over the past 3 months caused some challenges in terms of planning of the visits. The regular in factory visits` focused on identifying the non-value-added activities in production that impact productivity, as well as how the current quality system may be playing an important role into the productivity components for which awareness on quality at the source must be created. Factories and brands continue to provide positive feedback on the project. During the Regional Buyers Forum in Hong Kong, project progress was presented and participating brands provided positive feedback on the results and encouraged Better Work to scale this work. Other productivity enhancement pilot projects are implemented in other BW countries. In 2019, Better Work will evaluate which tools and measures could be incorporated into the standard Better Work service offer.
- ◆ A joint mission of the International Trade Union Confederation (ITUC), of the Confederation of Workers of the Americas (CSA), of the Bureau for Workers' Activities (ACTRAV) of the ILO and Better Work (BW) was conducted in September 2018, in Port-au-Prince, with a view to discuss various points concerning the trade union situation in the garment sector. The objective of the mission were as follows:
 - Consult and reach agreement with Haitian trade unions on principles of representation for the garment industry (which can support similar efforts at national level) and a mechanism for electing new union representatives to the Better Work Project Advisory Committee (PAC).



- Assess the current capacity building needs of trade unions representing workers in the Haitian apparel industry, as a basis for defining the key priorities of a workplan of all included partners to complement the current 5-year strategic phase of the Better Work Haiti Programme.
- Identify the key barriers towards the advancement of Freedom of Association and meaningful social dialogue at sectoral and national levels in Haiti, as a means towards proposing recommendations to the ILO's Programme of Work in Haiti.
- ◆ With the new phase of the Better Work Haiti program from 2018 - 2022, capacity building of all tripartite constituents - including Government partners - has become a key area of focus for the program. Hence, activities conducted and initiated under the ILO/MAST program are being continued and completed by BWH:
 - BWH collaborated with MAST to develop and implement a national training plan for ONA, OFATMA and labor inspectors. Currently, MAST trainers have conducted 6 training sessions in five departments of the country (West, North, North-east, South and Center department). A total of 173 inspectors of ONA, OFATMA and MAST regional office have been participating in these training sessions.
 - BWH supported Labor Administration to develop and implement a national labor inspection plan. So far, labor inspectors from West Department have carried out 13 inspections.
 - BWH facilitates the execution of several administrative reform activities within the Labor Administration, such as the development of an archiving system for the labour administration system, the set up of a call centre, the development and design of three types of communication products (Banners, Flyers and audio spot) to facilitate the Core Labor Standard and National Labor promotion campaign, as well as the MAST website.
 - BWH support the government to increase social security coverage and the quality level of services of ONA and OFATMA for workers in the garment sector. In the reporting period more



factories have comply to register their workers in collaboration with ONA and OFATMA gradually more present in the sector.

2.1. Compliance Situation in Haiti's Exporting Garment Sector

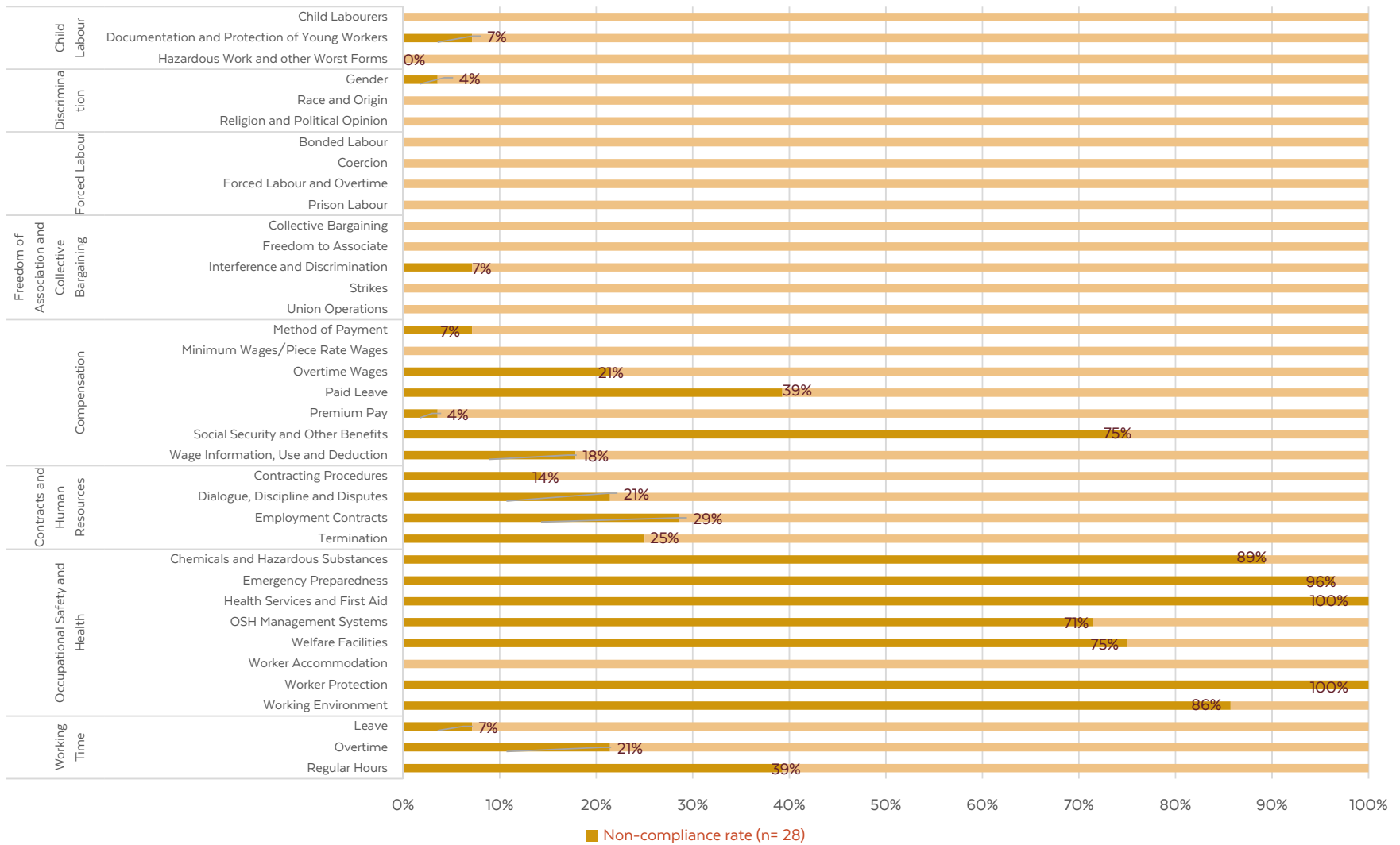
All factories registered with the Better Work program in Haiti are assessed once per year. This assessment is conducted after an initial advisory period of about 100 days and follow up advisory visits and trainings are offered after the assessment to facilitate continuous learning and improvement. For more information on the Better Work service delivery model as well as the Better Work assessment methodology, please consult annex 2 and annex 3 respectively. This section presents the results of assessments, advisory and training services provided to all 28 participating factories in the period between September 2017 and August 2018.

The first chart presents non-compliance findings for the 28 assessed factories in Haiti showing non-compliance rates in brackets. A factory is found non-compliant in a compliance point if it is found out of compliance on any one aspect of it. Please note that as these reports are issued biannually, yet assessments are being done on an annual basis, issues are reported in two consecutive reports. In the individual factory tables in Annex 4 of this report, progress on the remediation of non-compliance issues can be followed in further detail.

Persistent noncompliance issues in areas related to compensation (social security) and OSH (Chemicals management and emergency preparedness) continue to be a concern for the sector. In addition to the focus on management systems during advisory and training, Better Work is working closely with the Ministry of Labor and Social Affairs, ONA and OFATMA to address these issues in a sustainable way. In fact ensuring that all parties involved in labor inspection are aligned on the way to assess and address these issues is key to solving them. A first OSH training was organized by Better work and MAST for OFATMA inspectors in October 2017. Also, a joint workshop was organized in May 2018 with inspectors from MAST, ONA and OFATMA to review the legal framework on social security and agree on the approach for assessing compliance in this area. Better Work is also supporting the Ministry of labour in the implementation of a national training plan for MAST, ONA and OFATMA inspectorate to reinforce their capacity in compliance assessment. All these efforts should contribute to reduce the rates of persistent noncompliance by 2019 as several actors will be actively involved in the monitoring of these issues.



Chart 1: Non-compliance rates by Compliance Point - September 2017 - August 2018 (28 factories)





2.2. Compliance Performance with regards to International Core Labor Standards

During the last round of assessments between August 2017 and September 2018 in 28 factories, the following results with regards to core labor standards have been observed.

CHILD LABOR

During the period under review, there were two findings related to child labor. Although no child was found working in any of these two factories, these non-compliance issues are due to the fact that both factories failed to request proper identification for some workers during the hiring process. Keeping a reliable system in place to verify the age of workers prior to hiring is a key element to prevent child labor in garment factories.

DISCRIMINATION

One case of gender discrimination was found during the reporting period. The factory found in non-compliance has a policy on sexual harassment, has organized sexual harassment prevention training at all levels of management and workers, and has followed through with termination when such incidents occurred. Also, all supervisors and managers are trained on sexual harassment and required to commit to respect the factory's policy on this matter. However, this policy has been undermined through management discretion at the module level to rehire a known offender. In addition, it was found that male management staff was conducting random bathroom checks at the same factory which has created a humiliating work environment for workers. At the time of the assessment visit, there was no evidence that specific measures have been put in place to ensure that known harassers are not rehired or that HR staff do not abuse their power, or that bathroom checks if necessary are only conducted by a person of the same sex in a respectful manner. The factory took immediate action following the assessment visit to terminate the harassers. BWH is providing additional advisory and training services to help the factory improve its current procedures. Also, a new training on sexual harassment is being implemented at several factories since August 2018 in order to prevent sexual harassment and raise workers awareness.



FORCED LABOR

There are no findings under the Forced Labor Cluster in this reporting period.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

There are two cases of non-compliance under the cluster for Freedom of Association and Collective Bargaining, all under the compliance point of Interference and Discrimination. These two cases were already reported in the April 2018 report. The details of remediation efforts on these cases, are available in individual factory tables in Annex 4 of this report.

As previously mentioned, Better Work recommended to reinstate the terminated workers with compensation for back pay. Better Work also made the following industry wide recommendations after a series of strikes in 2017:

- ◆ The employers and Trade Union Representatives that are present on the Social Dialogue Table (ideally in consultation with employers and unions that are not titular members of the Social Dialogue Table) should consider a review and amendment - as necessary - of the Terms of Reference of the Social Dialogue Table, to ensure that it is functionally representative of employer and worker interests in the export garment and textile industries and that it meets on a regular basis with clear outcomes.
- ◆ Review and revise as necessary provisions in the Labor Law Guide relating to strikes, so that they fully and accurately reflect Haitian Law and international labor standards.
- ◆ In the ongoing Labor Law reform process, the Government of Haiti and the social partners should work to ensure that there is adequate protection for factory level trade union officers in carrying out their representative functions, with adequate protection against acts of anti-union discrimination, including during recruitment, hiring, employment and termination.
- ◆ In collaboration with the ILO, the Government of Haiti, in partnership with the social partners in Haiti, may consider a review and amendment of the Terms of Reference of the Superior Council of Wages (Conseil Superior des Salaires, or CSS), including the selection process and mandate of representatives. The trade unions in the sector, with the support of ILO ACTRAV and the Global Unions, may consider



establishment of a labor caucus for the preparation of, and follow-up to decisions of the CSS.

- ◆ Haitian Employers' and Workers' Organizations may wish to consider a review of the lessons learned from collective bargaining at the enterprise level in Haiti, and if appropriate, request support from the ILO on technical assistance on examining models of collective bargaining that may be most relevant to the garment and textile industry in Haiti, including with respect to representative voices of workers and employers in the process.
- ◆ Factories and trade unions that have negotiated and implemented FOA policies and protocols may consider engaging with workers and other relevant stakeholders, (with ILO support) to determine lessons learned and areas of improvement for better industrial relations.
- ◆ The ILO and MAST should focus on consolidation of the existing collaboration between the Better Work Haiti Program and the Labor Inspectorate Garment Sector Task Force, and develop recommendations for sharing lessons learned and strategies for ensuring maximum effectiveness, efficiency and independence of the inspectorate with other MAST departments.
- ◆ ADIH and Trade Union Federations should provide support to factories and enterprise level union representatives on developing the capacity of employers and unions to resolve rights and interest disputes in line with Haitian law and international labor standards, with the support of the Haitian Labor Ombudsperson and the ILO.

These recommendations were presented to Better Work Haiti's stakeholders and assisting partners on these issues is part of the new workplan of the program for the next five years. As a results, the following actions were taken :

- ◆ The consultations related to the Labor Law reform process, resumed in August 2018. The ILO is supporting the process by providing administrative and logistical support. The Government of Haiti and the social partners are expected to ensure that there is adequate protection for factory level trade union officers in carrying out their representative functions, with adequate protection against acts of anti-union discrimination, including during recruitment, hiring, employment and termination.



- ◆ The Government of Haiti appointed a new member to the Superior Council of Wages (Conseil Superior des Salaires, or CSS), in order to ensure that this committee is able to fulfill its mission.
- ◆ As mentioned above, a high level mission with representatives from Better Work Global and ITUC was conducted in September 2018 in order to discuss challenges faced by trade unions in Haiti.
- ◆ Better Work hired a former ILO projet officer working on the ILO-MAST capacity building project in order to continue the work related to the consolidation of the existing collaboration between the Better Work Haiti Program and the Labor Inspectorate Garment Sector Task Force. Lessons learned and strategies for ensuring maximum effectiveness, efficiency and independence of the inspectorate with other MAST departments are being discussed in regular meeting with MAST management.

2.3. Compliance Performance with regards to National Labor Standards

Better Work's compliance assessment framework is based on eight clusters, four related to international core labor standards (see previous section) and four with regards to national labor legislation. Each cluster consists of several compliance points and each compliance point is made up of several questions (see Table 3 in the annex for further detail on the structure of the Better Work compliance assessment tool). In this section, selected compliance points will be analysed in further detail. Chart No. 1, which gives an overview of the compliance performance of the full set of factories in the sample, shows that the same compliance points tend to remain at high non-compliance rates of over 50% from one cycle to the next. Most of these so-called persistent non-compliance (PNCs) points have been analysed in detail in past reports. Therefore, some compliance points with lower non-compliance rates will be included in further detail in this edition of the report.

COMPENSATION

In the Compensation cluster, the highest non-compliance rates persist in the compliance point of Social Security and Other Benefits (75%), as well as the



compliance point on Paid Leave (39%). 21% of factories were found in non-compliance with regards to overtime wages. In general there is significant progress related of these points in comparison to previous years. The progress observed in the compensation cluster is due to the fact that the government clarified the issues related to the average daily salary for piece rate workers both in a note published in, March 2017 and in the labor law guide published by BWH in collaboration with the government in December 2017. BWH Enterprise advisors were able to be more effective in their advisory work with these new written guidelines as the factories started to apply them. Also, the recent collaboration with both ONA and OFATMA helped reduce the number of non-compliance cases related to social security. Notable efforts were observed in the number of factories registering with the new maternity and health insurance offered by OFATMA. Five factories were also found in noncompliance for not keeping one accurate payroll record. These findings were in general related to the fact that time records were inconsistent with the payrolls for overtime or hours of work performed during weekly rest days. All assessed factories are in compliance with regards to the payment of the legally required minimum wage. Further details on the compliance points of overtime wages and paid leave are provided below.

OVERTIME WAGES

Compliance Question	# of factories found NC	NC Rate by Question
Does the employer pay workers 50% above the normal wage for all ordinary overtime hours worked?	6	21%
Does the employer pay workers 50% above the normal wage for overtime hours worked on legally mandated holidays?	0	0%
Does the employer pay workers 50% above the normal wage for overtime hours worked on weekly rest days?	0	0%

Six factories were found in non-compliance for not paying workers 50% above the normal wage for all ordinary overtime hours worked. In fact, in four of these factories, assessors found that overtime hours are not always recorded for workers in the sewing lines. In one of the facilities, assessors also found that several workers categorized as apprentices were subjected to overtime hours. During interviews, these workers confirmed that they regularly work beyond normal working hours but receive only the apprentice salary, which is 40% of the minimum wage with no compensation for the overtime hours worked.



In the other two factories, although overtime hours are recorded, they are not paid due to internal procedures. For example, in one factory workers receive the production bonus for reaching their daily quota for which the occasional extra overtime hours was necessary. Management explained that the bonus is more favorable to workers than the overtime payment since it is higher. In the other one, any time worked after 4 pm without prior approval is not compensated. As a result, in the attendance, the actual exit time is different than the exit time considered by the factory to be compensated. Management said that they only allow 1 hour overtime except in case of inventory or emergency, although workers might voluntarily choose to stay after 5 pm, in order to reach their quota. Interviewed workers said they were not aware of overtime payment conditions.

PAID LEAVE

Compliance Question	# of factories found NC	NC Rate by Question
Does the employer pay workers correctly during breastfeeding breaks?	0	0%
Does the employer pay workers correctly during sick leave?	6	21%
Does the employer pay workers correctly during the daily break?	0	0%
Does the employer pay workers correctly for annual leave?	1	4%
Does the employer pay workers correctly for legally mandated holidays?	4	14%
Does the employer pay workers correctly for maternity leave?	6	21%
Does the employer pay workers correctly for weekly rest days?	4	14%

Six factories were found in non-compliance for inaccurate payment of sick leave. In fact, the calculation of sick leave payments for workers entitled to incentives is based on the minimum wage of reference instead of average earnings as required by the law under Article 148. The other non-compliance issues under paid leave such as the payment for legally mandated holidays, maternity leave and the weekly rest days are also related to the fact that the payments were based on the minimum wage instead of average earnings. In all these cases, management stated that they were not aware of this requirement and informed the Better Work assessors that the necessary modification in the payroll system will be made. However it is important to note that the new law published in September 2017 on the organization of the



working hours in three shifts of eight hours eliminated the requirements to pay for non-working weekly rest days and legally mandated holidays. However most factories are not applying this new regulations due to the fact that such benefits are already included in their current work contracts or internal work rules. This new law also require the payment of the daily break for a minimum of 30 minutes. The new legal requirement is also not yet applied. Management explained that they have not yet implement the new law related to the organizing and regulating work over a 24-hour period divided into three segments of eight hours. Documentation review, management and workers interview confirmed that the employers still provide benefits that are no longer required under the new law on working hours such as payment for the weekly rest day or non-working holidays. Therefore, Better Work is not finding non-compliance for the non-payment of the daily break for this cycle.

CONTRACTS AND HUMAN RESOURCES

In the cluster on Contracts and Human Resources, an average of 17% of factories were cited in non-compliance under the compliance point termination for different questions. Further details are outlined in the tables below.

TERMINATION

Compliance Question	# of factories found NC	NC Rate by Question
Does the employer compensate workers for unused paid annual leave when they resign or are terminated?	2	7%
Does the employer comply with legal requirements before suspending workers or reducing the size of the workforce due to changes in operations, lack of materials, force majeure, or accident resulting in an immediate work stoppage?	0	0%
Does the employer pay workers their annual salary supplement or bonus upon termination?	4	14%
Does the employer provide workers proper notice of termination when required, or pay workers during the notice period?	4	14%
Does the employer terminate workers for reasons that are invalid under national law?	0	0%
Has the employer complied with any orders to reinstate or compensate workers who were found to be unjustly terminated?	0	0%



Two factories were found in non-compliance for not properly compensating workers for unused paid annual leave when they resign or are terminated. Workers are entitled of 1.25 days of annual leave per month. However, in the first factory, documentation review revealed that as of October 2017, only 6.25 days are paid to workers regardless of the duration of their employment. Management explained that this mistake was due to a change in their payroll procedures and confirmed that they would address this issue immediately. In the second factory, the documentation available did not have any evidence for payment of unused annual leave upon resignation or termination. Management said that they did not pay workers for unused annual leave upon resignation or termination because they had a different understanding of the legal requirement and thought that workers needed to complete 1 full year of employment to become eligible for annual leave payment. This can be explained by the fact that this new factory had not yet recruited a qualified Human Resources Manager at the time of this first assessment visit at this facility.

Four factories were found in non-compliance for the payment of the annual salary supplement or bonus upon termination. In fact, it was found that the method used to calculate these payments were incorrect in both factories. Both employers agreed to verify their payroll system and fix the issues. Four factories were found in non-compliance for inaccurate payment of the notice of termination when required. In fact, the calculation of the notice of termination payments for workers entitled to incentives is based on the minimum wage of reference instead of average earnings as required by the law under Article 148.

OCCUPATIONAL SAFETY AND HEALTH

The non-compliance rates for Occupational Safety and Health remains high in the Haitian garment industry (average 76.5%). The highest levels on non-compliance in that cluster is related to the compliance points of emergency preparedness, health services & first aid, chemicals and hazardous substances and the workers' protection and working environment compliance points.

CHEMICALS AND HAZARDOUS SUBSTANCES

Compliance Question	# of factories found NC	NC Rate by Question
Are chemicals and hazardous substances properly labelled?	18	64%



Are chemicals and hazardous substances properly stored?	10	36%
Does the employer have chemical safety data sheets for all the hazardous chemicals used in the workplace?	22	79%
Does the employer keep an inventory of chemicals and hazardous substances used in the workplace?	17	61%
Does the employer provide adequate washing facilities and cleansing materials in the event of exposure to hazardous chemicals?	16	57%
Has the employer effectively trained workers who work with chemicals and hazardous substances?	2	7%
Has the employer taken action to assess, monitor, prevent and limit workers' exposure to chemicals and hazardous substances?	8	29%

88% of the factories assessed were found in non-compliance in the chemicals and hazardous substances compliance point. These high levels of non-compliance are due to the fact that the factories are still failing to implement sustainable systems to ensure that all chemicals and hazardous substance used in the workplace are properly managed. Better Work has been offering seminars on the issue since 2013 with support from the Inter-American Development Bank. However, with high staff turnover, weak management systems, lack of sanctions from the authorities in charge and lack of pressure from buyers to fix this issue, factories are not motivated to sustainably address this issue. During the reporting period, Better Work therefore offered a new industry seminar on chemicals management to once again try to influence factories to address this issue with new tools and methods. Also, enterprise advisors are expected to work at individual factories level to ensure that each employer can improve their chemicals management procedures.

WORKER PROTECTION

Compliance Question	# of factories found NC	NC Rate by Question
Are appropriate safety warnings posted in the workplace?	13	46%
Are electrical wires, cables, switches, plugs and equipment (e.g. transformer, generator, electrical panel, circuit breakers) properly installed, grounded (for equipment), and maintained?	18	64%



Are proper guards installed and maintained on all dangerous parts of machines and equipment?	13	46%
Are workers effectively trained and encouraged to properly use personal protective equipment and machines?	10	36%
Are workers punished if they remove themselves from work situations that they believe present an imminent and serious danger to life or health?	0	0%
Does the employer comply with ergonomic requirements?	14	50%
Does the employer provide workers with all necessary personal protective clothing and equipment?	18	64%

All factories assessed have at least one non-compliance issue related to the workers' protection point. These high levels of non-compliance are related to issues such as the lack of proper guards installed and maintained on all dangerous parts of machines and equipment in thirteen factories or missing personal protective clothing and equipment in eighteen factories. Also, fourteen factories were found not complying with ergonomic requirements such as providing all seated workers with chairs with backrest and all standing worker with proper ergonomic standing mats. The fact that OSH officers and committees are not sufficiently empowered to execute their duties in most factories seems to play an important role in the persistence of these issues that require constant monitoring. Electrical safety is also a growing concern in the sector. Additional training provided to BWH assessors by Better Work Global helped to identify new issues related to electrical wires, cables, switches, plugs and equipment (e.g. transformer, generator, electrical panel, circuit breakers) not properly installed, grounded (for equipment), or maintained. A mission with BWG OSH specialist is scheduled to help the factories address these issues.

WORKING TIME

The working time cluster consists of three compliance points. The compliance point of leave saw a non-compliance rate of 7% over the last year, while about a fifth of factories were in non-compliance for overtime hours. The highest non-compliance point with 39% non-compliance rate was on regular hours. Further details on this point can be found below.



REGULAR HOURS

Compliance Question	# of factories found NC	NC Rate by Question
Do regular daily or weekly working hours exceed the legal limit?	1	4%
Does the employer comply with the daily break period?	1	4%
Does the employer give workers at least one day off after 48 hours of work ?	0	0%
Does the employer keep working time records that reflect the hours actually worked?	7	25%
Does the employer obtain authorization from the Department of Labour before working at night?	1	4%
Does the employer post the factory's working hours (for all shifts, and including break times)?	6	40%

The highest rate of non-compliance in the area of regular working hours was due to seven factories for which the assessors found inaccuracies in the working time records. In three of these factories, workers' attendance was registered manually by management and there was no evidence that workers could confirm the accuracy of these records before the payroll. Management in these factories explained that this was due to the fact that several workers lost their badges which caused delays at the entrance in the mornings. In the other four factories, issues such as overtime hours or hours performed on weekly rest day not recorded were identified. However, a subsequent loss of wages was only identified in one factory.

The compliance point on regular hours also includes two new questions related to the new law on working hours. "Does the employer give workers at least one day off after 48 hours of work?" All factories were found in compliance for this question. However, on the second new question "Does the employer post the factory's working hours (for all shifts, and including break times)?", six factories were found to be non-compliant.

2.4. Advisory and Training Services in the Reporting Period

BETTER WORK ADVISORY SERVICES

During the reporting period, Better Work Haiti continued its efforts to establish social dialogue mechanisms at factory level through bipartite committees (PICC). However, these committees need to be supported to become more



independent and being able to meet without Better Work presence. The PICC sustainability training program developed by Better Work Global was reviewed and adapted to meet the needs of the Haitian garment factories. However, one of the challenges to implement it was the changes in the PICC membership. Below is an overview of each factory in the Better Work Haiti program and the status of its bipartite committee.

Table 1: Factory's PICC Status

	Name of factory	PICC Status
1	Caribbean Island Apparel S.A.	Set up and functioning
2	Cleveland Manufacturing S.A. (former GMC)	No active PICC
3	CODEVI	Set up and functioning
4	Everest	Set up and functioning
5	Fairway Apparel S.A.	Set up and functioning
6	Go Haiti S.A.	Setup in progress
7	H4H	Set up and functioning
8	H&H Textiles S.A.	Set up and functioning
9	Haiti Premier Apparel S.A.	Set up and functioning
10	Hansae	Set up and functioning
11	Horizon Manufacturing S.A.	Set up and functioning
12	Interamerican Wovens APH S.A.	Set up and functioning
13	Interamerican Wovens S.A.	Setup in progress
14	Life S.A.	Set up and functioning
15	MAS Akansyel	Set up and functioning
16	MGA Haiti S.A	Set up and functioning
17	Modas BU IL Haiti S.A.	Set up and functioning
18	Pacific Sports Haiti S.A.	Set up and functioning
19	Palm Apparel S.A.	Set up and functioning



20	Premium Apparel S.A.	Set up and functioning
21	Quality Sewing MFG. S.A.	Set up and functioning
22	S&H Global S.A.	Set up and functioning
23	Sewing International S.A.	Set up and functioning
24	The Willbes Haitian II S.A.	Set up and functioning
25	The Willbes Haitian III S.A.	Newly formed PICC
26	The Willbes Haitian II B S.A.	Newly formed PICC
27	The Willbes Haitian Print Shop S.A.	No active PICC
28	Val D'Or Apparel MFG Haiti S.A.	Set up and functioning

During the reporting period, Better Work Haiti completed 101 advisory visits including bipartite committee meetings in a total of 28 participating factories. The advisory visits were affected by the general tensions in the country and the more specific issues in the garment sector related to the strikes initiated by the unions to request an increase of the legal minimum wage between May and July 2018. For this period advisory services were focused more on management systems improvement and bipartite committees' capacity building. In fact, since membership issues identified in the previous period were addressed, advisors are supporting the bipartite committees to be more effective by organizing regular meetings and keeping adequate records. Among the good practices observed, Better Work initiated the creation of group chats to ensure a rapid and ongoing communication between PICC members. The union leaders at factory level showed less resistance to join the PICC, however, some federation leaders are still very reluctant to support the process which explains why the union contribution to the committee is not always at the expected level. Management from all factories were required to designate management staff with sufficient decision making to regularly attend the meetings, however the recent industrial relations issues prevented some meetings to take place as scheduled. The strikes related to the minimum wage are a recurrent challenge that affects Better Work's activities in factories during the second trimester of every year since 2016.



BETTER WORK TRAININGS

In addition to in factory visits conducted during the reporting period, eleven industry seminar were organized. The main subjects were chemicals` management, the Better Work compliance framework, grievance mechanisms, risk management and control and inclusion of disabled people in the workplace. This last industry seminar was organized both in Port-au-Prince and in the Northeast on the Better Work with BSEIPH (Bureau du Secretaire d'Etat à l'Intégration des Personnes Handicapées). The purpose of this industry seminar was to help the factories prepare for the upcoming changes in the assessment process. In fact, Better Work plans to include additional question in the compliance assessment tools (CAT) to meet the requirements of the law on the inclusion of disabled persons. The results expected from these workshop is an increase in the number of disabled people working in the industry but also an improvement of their working conditions.

During the reporting period 25 trainings sessions were offered to factories in Port-au-Prince, Caracol and Ouanaminthe. In an overview, the trainings offered by Better Work Haiti during the reporting period include:

- ◆ Leadership Skills
- ◆ Occupational Safety and Health
- ◆ PICC training
- ◆ Supervisory Skills Training (SST)
- ◆ Compliance assessment methodology
- ◆ Occupational safety and health
- ◆ Workers` rights and responsibilities
- ◆ Sexual Harassment Awareness and Prevention for Supervisors
- ◆ Sexual Harassment Awareness and Prevention for workers

During the reporting period, the Better Work Training Team trained a total of 811 participants – management and workers – on the above mentioned training topics, including 387 women. In addition to the funding received from USDOL, Better Work Haiti continues to use the funds from The Walt Disney Company



to implement training on supervisory skills and leadership skills (Managing People). Once again, revenues were also generated from non-garment factories' participation in training. Although the amount collected was small as BWH did not specifically target participants from other industries, it is a confirmation that Better Work Haiti can benefit from exploring opportunities of revenues with other industries.

During this period the program implemented the paperless evaluation. In fact, now the training participants use tablets to evaluate the training sessions through an online software which helps to have more accurate data in less time. This new process will also contribute to the improvement of the training impact assessment.

Section III: Conclusion and Next Steps

Better Work Haiti's 17h synthesis report provides a range of insights into the state of working conditions and labour standards in the garment industry today. The report draws upon data from 28 factories that were assessed from August 2017 to September 2018, bringing together quantitative compliance findings with qualitative evidence from day-to-day advisory and training work in factories. The findings have far reaching implications both for policymaking and wider industry development.

As in previous years, non-compliance remains concentrated in the working conditions clusters, particularly Compensation, Working Time and Occupational Safety and Health. In both areas, more than three-quarters of compliance points (i.e. question groupings) show non-compliance rates of more than 60 percent. Occupational safety and health has the most extensive list of questions in the Better Work assessment tool, and although there have been some observable recent improvements in this area, for example in reducing chemical exposure and establishing workplace OSH units, consistent across-the-board progress remains elusive in many factories. A major cause of this is the lack of a systems based approach to improvement, which means that even when OSH measures are strengthened, they are often susceptible to backsliding. Having policies and procedures in place to prevent and manage OSH risks can both reduce the likelihood of human error and mitigate compliance disruptions due to high staff turnover, which remains a common concern for many factories.



In the coming years there is also a need for more substantive efforts to strengthen the quality and visibility of enterprise level social dialogue and collective bargaining, and to pilot new mechanisms for reaching sustainable collective agreements as a bedrock of a well-functioning industrial relations architecture.

After considerable growth in recent years, Better Work Haiti is now entering its third phase, which will be guided in its implementation by a new programme strategy. Under this plan, the programme will continue to grow its factory membership base in the short term, whilst also intensifying longer term strategic efforts to build the capacity of national partners (i.e. MAST, ONA, OFTMA, BMST, ADIH and Trade Union organisation) so they can assume a greater and more direct role in supporting the programme and its impact. Beyond simply enforcing compliance, this will also imply a more prominent role for these institutions in advising and training enterprises, and in promoting industry competitiveness through responsible business, in line with their organizational mandates and the wider national development agenda in Haiti.



Annex 1. The TAICNAR Project and Reporting Requirements under the HOPE II Legislation

In 2006, the United States Congress enacted the Haiti Hemispheric Opportunity through Partnership Encouragement Act of 2006 (HOPE), expanding preferences for Haitian apparel established under the Caribbean Basin Economic Recovery Act, thus enabling the Haitian apparel industry to benefit from new duty-free preferences. In 2008, these preferences were further expanded through legislation known as HOPE II, which also established new standards and programs strengthening and monitoring working conditions in the apparel sector. On 24 May 2010, the Haiti Economic Lift Program of 2010 (HELP Act) was signed into law to expand existing preferences even more to contribute to Haiti's economic growth and development in both the textile and apparel sectors. Among its provisions, the HELP Act extended almost all of the trade preferences established under HOPE and HOPE II and in 2015, the US Government extended the Haiti HELP/HOPE provisions until 2025.

In order to benefit from HOPE/HOPE II/HELP, Haiti was required to establish an independent Labor Ombudsman appointed by the President of the Republic in consultation with the private sector and the trade unions. Haiti was also required to work with the ILO, to develop a technical assistance program to (i) assess and promote compliance with core labor standards and national labor law in the factories that are eligible for tariff advantages under HOPE II and (ii) provide assistance to the Government of Haiti in order to strengthen its capacity in the process of inspection of facilities.

This was referred to in the legislation as the *Technical Assistance Improvement and Compliance Needs Assessment and Remediation* (TAICNAR) program. Finally, Haiti needed to develop a mechanism for ensuring that all producers benefiting from the HOPE II trade preferences participated in the TAICNAR program. The TAICNAR program consists of two components:



TAICNAR Program Component 1: Compliance Assessments and Remediation Support

The HOPE law states that the first component of the TAICNAR program is “to assess compliance by producers listed in the registry described in paragraph (2)(B)(i) with the conditions set forth in subparagraph (B) and to assist such producers in meeting such conditions.”

Better Work Haiti is implementing this component of the TAICNAR program. Aggregated findings for the entire industry regarding compliance with national and international labor law are outlined in section II of the report. The details of Better Work’s assessment methodology are explained in annex 3 of this reports. Annex 4 provides the details of compliance for every factory that has been assessed.

It has to be noted that Better Work offers several services that go beyond the requirements of the HOPE legislation, in particular the collaboration with international brands through sharing of factory assessment reports, joint support for factories regarding the improvement plan used during advisory services (corrective action plan), specific trainings and specific projects and or events such as the annual buyers and multi-stakeholders forum. With the introduction of fees to be paid by factories for participation in the Better Work Haiti program since 2016, it has been decided that non-paying factories will receive all Better Work core services (advisory, training, and one annual assessment) in line with requirements of the HOPE legislation. Factories that do pay their subscription fee will have access to the full offer of Better Work services beyond core services only.

TAICNAR Program Component 2: Technical assistance to strengthen the legal and administrative structures for improving compliance in the industry

The HOPE law states that the second component of the TAICNAR program is “to provide assistance to improve the capacity of the Government of Haiti - (I) to inspect facilities of producers listed in the registry described in paragraph (2)(B)(i); and (II) to enforce labor laws and resolve labor disputes, including through measures described in subparagraph E.”

The ILO has been conducting different activities under this component, mainly in the context of the USDOL-funded ILO/MAST Capacity Building project which aimed at strengthening the capacities of the Ministry in order to improve apparel factories’ compliance with international and national labor laws. The project ran from 2014 to 2017 and was closely linked to the Better Work program.

As of 2018 and with Better Work’s new 5 year strategy in Haiti, the program will continue to build on the efforts of this MAST capacity building program. The



revised project strategy puts stronger emphasis on the capacity building of all tripartite constituents – government, employer and worker Organizations – as part of the sustainability efforts of the Better Work program.

With regards to the reporting requirements, the HOPE II law specifies which information needs to be included in the biannual reports to be published by the TAICNAR program. See text box below for the original text of the law.

SEC. 15403. LABOR OMBUDSMAN AND TECHNICAL ASSISTANCE IMPROVEMENT AND COMPLIANCE NEEDS ASSESSMENT AND REMEDIATION PROGRAM.

[...] (D) BIENNIAL REPORT. –The biannual reports referred to in subparagraph (C)(i) are a report, by the entity operating the TAICNAR Program, that is published (and available to the public in a readily accessible manner) on a biannual basis, beginning 6 months after Haiti implements the TAICNAR Program under this paragraph, covering the preceding 6-month period, and that includes the following:

- (i) The name of each producer listed in the registry described in paragraph (2)(B)(i) that has been identified as having met the conditions under subparagraph (B).
- (ii) The name of each producer listed in the registry described in paragraph (2)(B)(i) that has been identified as having deficiencies with respect to the conditions under subparagraph (B), and has failed to remedy such deficiencies.
- (iii) For each producer listed under clause (ii) –
 - (I) a description of the deficiencies found to exist and the specific suggestions for remediating such deficiencies made by the entity operating the TAICNAR Program;
 - (II) a description of the efforts by the producer to remediate the deficiencies, including a description of assistance provided by any entity to assist in such remediation; and
 - (III) with respect to deficiencies that have not been remediated, the amount of time that has elapsed since the deficiencies were first identified in a report under this subparagraph.
- (iv) For each producer identified as having deficiencies with respect to the conditions described under subparagraph (B) in a prior report under this subparagraph, a description of the progress made in remediating such deficiencies since the submission of the prior report, and an assessment of whether any aspect of such deficiencies persists. [...]



Annex 2. Better Work's Service Delivery Model

The key principles of Better Work's revised service model are ownership, accountability, dialogue and partnership. The core services offered to factories are advisory services, an annual assessment, and training services.

Better Work's service delivery model stresses the importance of advisory services with a stronger focus on assistance on management systems, root cause analysis and continuous learning. Better Work acknowledges the fact that auditing alone cannot contribute to sustainable remediation of non-compliances. Assessments provide a snap shot of the compliance issues, yet they do not add significant value to improvements of factories' compliance performance. Therefore, the focus in the services that Better Work delivers to factories are on continuous learning and improvements working with factories on root causes that are underlying repeated non-compliance issues.

Since 2015, a factory cycle no longer starts with an assessment on which advisory services afterwards were built in the initial approach. Under the revised Better work service delivery model, the cycle now starts with a period of approximately 100 days of advisory services in which the factory with its bipartite committee can conduct a self-diagnosis with support of its Better Work Enterprise Advisor and can work on immediate improvements where possible. The unannounced Better Work assessment is then conducted after the initial period of advisory and training services.

Following the assessment, the advisory process continues, focused on enabling the bipartite committee to address issues that are listed in the improvement plan. The improvement plan includes issues that the factory has self-diagnosed and those that were identified during the Better Work assessment. Factories will be supported through tailored factory visits; issue specific seminars (on topics relevant to the country/industry) with peers from other factories; and training appropriate to the factory's specific needs.

Better Work reporting has two elements – reports completed and verified by the Better Work program and those that are completed and released directly by factories. The Better Work factory reports consist of the assessment report that is released roughly 30 days after the unannounced assessment visit. Then later on in the cycle, in the 11th month of the cycle, Better Work then publishes a progress report, detailing improvements on compliance issues, as well as in-

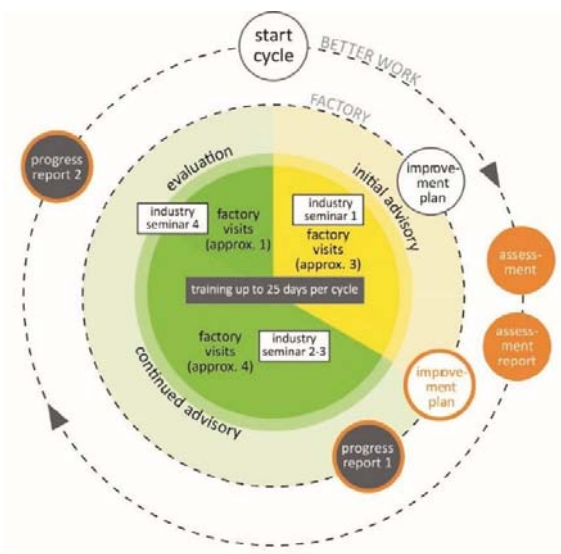


factory dialogue, continuous learning and the use of effective management systems. Better Work also provides additional recommendations in this report to further strengthen the improvement process. Factories report through the Better Work portal. This portal is the platform that is also used by Better Work to share factory data with authorized international brands that subscribed to a specific factory in either of the Better Work country programs. The enhanced portal with the revised self-reporting function also offers the opportunity for factories to update their improvement plan themselves. The improvement plan lists a factory's non-compliance points from the last Better Work independent assessment together with any other issues that the factory itself identified as areas for improvements. Once the factory updates its improvement plan online, the information is immediately available to buyers and Better Work. However, this feature has some limitations with regards to the factories' editing rights as only Better Work can update the status of a non-compliance issue from "delayed", "pending", or "in progress", to "completed" after verification of evidence of remediation.

Factory reporting then continues with the first progress report which is published approximately 5 months after the start of the cycle. This report includes progress to date on all self-diagnosed issues as well as those identified by Better Work during the assessment. This report has a pre-set structure from Better Work and it is made available to authorized buyers and indicates initial progress and planned steps for the remainder of the cycle. The Better Work role for this first progress report will be limited to coaching factories on how to engage in effective self-reporting and how to ensure continued progress on closing areas of non-compliance.

The Better Work Enterprise Advisors then write their own progress report towards the end of an annual cycle of each factory.

An overview of the sequence of the different components of the Better Work service model under this revised approach can be found in the illustration below:



Sequence and components of annual Cycle under Better Work’s revised service delivery model.

In 2017, Better Work started to differentiate factories depending on their performance. Factories that are scoring high enough in terms of compliance performance but also in the areas of dialogue and learning encompass the criteria that need to be satisfied before a factory can be qualified for “stage two”. In fact, Better Work will classify factories as being in “stage two” if they consistently demonstrate high levels of compliance, a mature level of social dialogue, effective management systems and a commitment to learning. Those criteria will be evaluated based on information collected during two consecutive assessments. Factories that have not yet met this benchmark will be classified as “stage one.” For factories that have been with Better Work for several years, service differentiation will respond to requests for greater autonomy in the day to-day advisory service, fewer assessments, and a tailored service that responds to their more advanced needs, for example relating to systems development, purchasing practices, productivity and quality, and mature industrial relations.



Annex 3. The Better Work Compliance Assessment Methodology

BETTER WORK COMPLIANCE ASSESSMENT FRAMEWORK

The Better Work program assesses factory compliance with core international labor standards and national labor law. Following assessments, a detailed report is prepared and findings are shared with the factory presenting findings on eight clusters, or categories, of labor standards, half of which are based on international standards and half on national legislation.

Core labor standards: The ILO Declaration on Fundamental Principles and Rights at Work, adopted in 1998, calls upon Member States to respect and promote these principles and rights in four areas, whether or not they have ratified the relevant conventions. These categories, or clusters, are: freedom of association and collective bargaining, the elimination of forced or compulsory labor, the abolition of child labor and the elimination of discrimination in employment and occupation. The conventions on which the 1998 Declaration is based are Nos. 29, 87, 98, 105, 100, 111, 138, 182, and they form the reference base in assessing factory compliance with fundamental rights for all the Better Work programs in various countries. For some issues, such as minimum legal working age, provisions in national law specify requirements for the application of international conventions. If national law is not consistent with international standards pertaining to core labor standards, the international standards are applied. Haiti has ratified all eight core Conventions listed above. According to the Haitian Constitution, ratified conventions become self-executing and therefore part of Haitian law.

Working Conditions: The four other clusters assess conditions at work, including compensation, contracts and human resources, occupational safety and health, and working time. The compliance points covered in these clusters are largely consistent across countries; however each compliance point contains specific questions that may vary from country to country due to differences in national legislation. National legislation is used as a reference point even if it is not in accordance with the international conventions that have been ratified by the country. In countries where national law either fails to address or lacks clarity around a relevant issue regarding conditions at work, Better Work establishes a benchmark based on international standards and good practices.



Table 2: Better Work compliance assessment framework

Compliance Cluster	Compliance Point	Compliance Issue
Child Labor	Child Laborers	Workers under age 15
	Documentation and Protection of Young Workers	Age verification system
		Medical certificate, and/or an employment certificate or permit delivered by the Director of Labor provided by workers under age 18.
		Register of workers under age 18.
	Hazardous Work and other Worst Forms	Workers under age 18 working at night.
		Workers under age 18 working overtime.
Workers under age 18 doing work that is hazardous by nature.		
Discrimination 2	Gender	Changing the employment status, position, wages, benefits or seniority of workers during maternity leave.
		Conditions of work (gender and/or marital status).
		Excluding maternity leave from workers' period of continuous service
		Hiring (gender and/or marital status).
		Job announcements (gender and/or marital status).
		Pay (gender and/or marital status).
		Pregnancy tests or use of contraceptives as a condition of employment
		Promotion or access to training (gender and/or marital status).
		Sexual harassment
		Terminating workers or forcing them to resign if they are pregnant, on maternity leave or nursing.
		Termination or retirement (gender and/or marital status).
		Race and Origin
	Harassment (race, color, origin)	
	Hiring (race, color, origin)	
	Pay (race, color, origin)	
		Promotion or access to training (race, color, origin)
		Recruitment materials (race, color, origin)

² In Better Work country-specific questionnaires, a compliance point "Other Grounds" may be included under the Discrimination cluster. This category is intended to assess specific discrimination issues that are covered in national labor law, and are considered to be aligned with the objectives of the relevant ILO conventions (100 and 111), but which are not explicitly named in the conventions, e.g., age, HIV/AIDS status, disability, etc. The questionnaire for Haiti does not include the "Other Grounds" compliance point because the Haitian labor law does not identify grounds for discrimination beyond those cited in Conventions 100 and 111.



	Religion and Political Opinion	Termination or retirement (race, color, origin)
		Conditions of work (religion or political opinion)
		Harassment (religion or political opinion)
		Hiring (religion or political opinion)
		Pay (religion or political opinion)
		Promotion or access to training (religion or political opinion)
		Recruitment materials (religion or political opinion)
Forced Labor	Bonded Labor	Termination or retirement (religion or political opinion)
		Debts for recruitment fees owed to the employer and/or a third party
	Coercion	Coercive tactics.
		Delaying or withholding wage payments.
		Forced labor to discipline workers or punish them for participation in a strike
		Free exit from the workplace at all times, including during overtime.
		Freedom of movement (dormitories or industrial park).
		Freedom to terminate employment with reasonable notice and/or to leave their jobs when their contracts expire
		Threats such as deportation, cancellation of visas or reporting to the authorities
	Violence or the threat of violence.	
Workers' access to their personal documents (such as birth certificates, passports, work permits and ID cards)		
Forced Labor and Overtime	Forced overtime under threat of penalty	
Prison Labor	Prison laborers	
Freedom of Association and Collective Bargaining	Collective Bargaining	Access to collective bargaining agreement.
		Collective agreement less favorable for workers than what is required by national law.
		Collective bargaining/bargaining in good faith.
		Implementation of collective agreement.
	Freedom to Associate	Freedom to form and/or join a union
		Requiring workers to join a union.
	Interference and Discrimination	Attempt(s) to interfere with, manipulate or control the union(s).
		Freedom to meet without management present.
		Incentives to refrain from joining a union or engaging in union activities.
		Punishment of unionists
	Termination or non-renewal of worker's employment contract due to union membership or activities	



		Threats, intimidation or harassment of unionists.
		Unequal treatment of multiple unions.
		Union membership or union activities factoring into hiring decisions
	Strikes	Hiring of replacement workers during a strike.
		Preventing workers from participating in a strike.
		Punishing workers for participating in a strike.
		Security guards, the police or armed forces called on to break up a peaceful strike or arrest striking workers.
	Union Operations	Deduction of union dues upon workers' request.
		Union representatives' access to workers in the workplace.
	Compensation	Method of Payment
Regular and timely payment of wages.		
Wage payment directly to workers at the workplace on working days		
Wage payment in legal currency.		
Minimum Wage		Correct payment of piece rate workers when their piece rate earnings exceed minimum wage.
		Payment of minimum wage for apprentices.
		Payment of minimum wage for temporary workers.
Overtime Wages		Payment for ordinary overtime.
		Payment for overtime hours worked on holidays.
		Payment for overtime worked at night.
		Payment for overtime worked on weekly rest days.
Paid Leave		Payment for annual leave.
		Payment for breastfeeding breaks.
		Payment for legally mandated holidays.
		Payment for maternity leave.
		Payment for sick leave.
Premium Pay		Payment for weekly rest days.
		Payment for regular hours worked at night.
		Payment for regular hours worked on holidays
Social Security and Other Benefits		Payment for regular working hours worked on weekly rest days
		Collecting and forwarding workers' contributions for social insurance funds to ONA.
		Employer contribution to OFATMA for maternity and health insurance.
		Employer contribution to OFATMA for work-related accident insurance.
		Employer contribution to ONA.
		Forwarding of workers' contributions to OFATMA.
		Payment of annual salary supplement or bonus.



Contracts and Human Resources	Wage Information, Use and Deduction	Deductions from workers' wages.	
		Informing workers about wage payments and deductions.	
		Payroll records.	
	Contracting Procedures	Limits on the trial period for apprentices.	
		Dialogue, Discipline and Disputes	Bullying, harassment or humiliating treatment of workers.
			disciplinary measures Resolution of grievances or disputes.
	Employment Contracts	Contracts for all persons performing work for the factory.	
		Employment contracts' compliance with the labor code, collective agreement and/or internal work rules.	
		Internal work rules.	
		Specifying terms and conditions of employment in written employment contracts.	
		Workers' understanding of the terms and conditions of employment.	
	Termination	Annual salary supplement or bonus upon termination.	
Notice of termination.			
Orders to reinstate or compensate unjustly terminated workers.			
Payment for unused paid annual leave upon resignation or termination.			
Reasons for termination.			
Reductions in workforce size or suspensions due to changes in operations			
Occupational Safety and Health	Chemicals and Hazardous Substances	Assessing, monitoring, preventing and/or limiting workers' exposure to hazardous substances.	
		Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	
		Inventory of chemicals and hazardous substances used in the workplace.	
		Labelling of chemicals and hazardous substances.	
		Storage of chemicals and hazardous substances.	
		Training workers who work with chemicals and hazardous substances.	
		Washing facilities or cleansing materials in the event of chemical exposure.	
	Emergency Preparedness	Accessible, unobstructed, and/or unlocked emergency exits during working hours, including overtime.	
		Fire detection and alarm system.	
		Firefighting equipment.	
		Marking or posting of emergency exits and/or escape routes in the workplace.	
Number of emergency exits.			



	Periodic emergency drills.
	Safeguarding possible sources of ignition
	Storage of flammable materials
	Training workers to use the firefighting equipment
Health Services and First Aid	Annual medical checks for workers.
	First-aid training for workers.
	Health checks for workers who are exposed to work-related hazards.
	Medical checks for workers upon hiring.
	Onsite medical facilities and staff.
	The employer did not ensure that there were a sufficient number of readily accessible first aid boxes/supplies in the workplace.
	Safety and health risks to pregnant or nursing workers
OSH Management Systems	Assessment of general occupational safety and health issues in the factory.
	Legally required construction/building permits
	Mechanisms to ensure cooperation between workers and management on OSH matters.
	Recording work-related accidents and diseases and/or submitting the record to OFATMA.
	Written OSH policy.
Welfare Facilities	Certain required facilities.
	Eating area.
	Providing drinking water.
	Toilets.
	Washing facilities and/or soap.
Worker Accommodation	Accommodation separate from the workplace
	Cooking or storage facilities in the accommodation.
	Lighting in the accommodation.
	Minimum space requirements in the accommodation.
	Preparation for emergencies in the accommodation.
	Privacy in the accommodation.
	Protection against disease carrying animals and/or insects in the accommodation.
	Protection against fire in the accommodation.
	Protection against heat, cold and/or dampness in the accommodation.
	Protection against noise in the accommodation.
	Toilets, showers, sewage and/or garbage disposal systems in the accommodation.
	Ventilation in the accommodation.
	Water in the accommodation.



	Worker Protection	Ergonomic requirements
		Installing guards on all dangerous moving parts of machines and equipment.
		Installing, grounding, and/or maintaining electrical wires, switches, and/or plugs.
		Posting safety warnings in the workplace
		Providing workers with personal protective clothing and equipment.
		Punishment of workers who removed themselves from work situations they believed presented an imminent and serious danger to life or health.
		Training and encouragement of workers to use PPE, machines and/or equipment safely
	Working Environment	Workplace cleanliness
		Workplace lighting.
		Workplace noise levels.
Workplace temperature and/or ventilation.		
Working Time	Leave	payment in place of annual leave
		Time off for annual leave.
		Time off for breastfeeding breaks.
		Time off for maternity leave.
		Time off for sick leave.
	Overtime	Authorization from the Department of Labor for overtime.
		Authorization from the Department of Labor for work on Sundays.
		Limits on overtime hours worked.
		Voluntary overtime.
	Regular Hours	Daily break periods.
		Regular daily and/or weekly working hours.
		Weekly rest period.
		Working time records.
Authorization from the Department of Labor before working at night.		

CALCULATING NON-COMPLIANCE & PUBLIC REPORTING

In public synthesis reports, Better Work reports on aggregated non-compliance in the participating industry as shown in Chart 1. Non-compliance is reported for each subcategory (compliance point, or “CP”) of the eight labor standards clusters. A factory is reported as non-compliant in a subcategory if it is found to be out of compliance on any issue addressed within the subcategory. With respect to the figures presented in synthesis reports, for example, a non-



compliance rate of 100% means that all participating factories were found to have at least one violation in that area.

The Better Work program supports fair and transparent public reporting. In all Better Work country programs, synthesis reports containing aggregated information on the industry are prepared on the basis of the individual factory assessment reports and published twice a year. Better Work is currently expanding its reporting in the other Better Work countries to include individual factory-level compliance information as is already the case for Haiti. Evidence shows that public reporting of this kind helps encourage continuous improvement and reduces the probability of reversing compliance gains. Gathering and reporting these data over time enables factories to demonstrate their efforts to improve working conditions.

LIMITATIONS IN THE ASSESSMENT PROCESS

The factory-level assessments carried out by Better Work Haiti follow a thorough checklist of about 230 questions covering the above mentioned labor standards, and gathering general information about the factory.³ Information is gathered through a variety of sources and techniques, including document review, observations on the factory floor, and interviews with managers, workers union representatives, bipartite committee members or any other relevant witness. The information collected is compiled and analysed to produce a detailed assessment report. Before the reports become official, factories are given seven calendar days to provide feedback.

Worker interviews conducted during the assessment process are held onsite, either in a private room within the factory building or outside the building (yard, eating area), and take place either in small groups or individually. Interviews are conducted in Creole, the primary language of the workers. Workers may be suspicious and feel uneasy about sharing information on their workplaces with people who are not well known to them and coaching of workers by factory management is a possible issue in the industry in general. Nevertheless, after fourteen assessment cycles conducted over more than seven years, Better Work Haiti Enterprise Advisors have become more experienced at collecting information and interviewing workers, which together with other activities led by Better Work Haiti have contributed in creating an environment where workers are more comfortable discussing working conditions. Interviews with workers cover many aspects of life at work and last approximately 20 minutes. On

³ Better Work Haiti Compliance Assessment Tool (CAT) including their legal references can be accessed here: http://betterwork.org/haiti/?page_id=1731



average, 40 workers representing different sections of the factories, as well as union representatives, are interviewed.

Violations in core labor standards such as sexual harassment or freedom of association are very sensitive and are more difficult to detect during factory assessments. The assessment of violation of freedom of association issues in the workplace is sometimes difficult to assess in a two days assessment. There are several reasons for that. One challenge is that some labor unions are organized at the sectoral level rather than at the factory level where small union cells predominate. Another challenge is that for example, the termination of unionist usually happens after a series of events. Key witnesses might have been terminated before the assessment days. Also supporting documents might not have the level of details required to determine non-compliance. Better Work is basing its assessment findings on triangulation of facts which requires sufficient evidence in order to find a factory in non-compliance on a particular compliance point and some issues are therefore not always easy to be confirmed. As more unions are present in the factories today, workers are more aware of their rights regarding freedom of association. Workers therefore are also demonstrating an increased level of openness to discuss this subject during interviews. In addition, Better Work collects information about specific cases as they are being shared by unions or other stakeholders at any given time of the year. During the assessment at a particular factory, specific questions can be asked about any case that has previously been raised and information may therefore enter the assessment report.

The assessment visits usually last two days and because it is a picture of the moment, some situations that might lead to non-compliance points in the future are not reported. It is also important to keep in mind that non-compliance issues might be identified during the advisory cycle through the self-diagnosis process. Better Work supports factories in order to reinforce their capacity to conduct a self-diagnosis and to develop an improvement plan that includes points that go beyond the Better Work assessment. For all the issues included in the improvement plan, additional information is stated, such as the action to be taken and the person responsible for it within the company. All of this information in return as well as the remediation efforts are then documented in the progress reports.

As Better Work is moving into a differentiated approach where services for advanced factories will be different from those for factories who still require more assistance, the evaluation of the performance of a factory will not only be limited to the assessment data but will also include information gathered in those progress reports.

Another issue that may be challenging to detect during an assessment is sexual harassment which is included in Better Work Haiti's compliance assessment



tool. Similarly to other countries, it is one of the most sensitive and most difficult issues to detect during factory assessments. The assessment of sexual harassment in the workplace by Better Work Haiti is likely to underreport the extent of its occurrence. However, sexual harassment remains an issue of concern in the industry in general. As mentioned, Better Work is basing its assessment findings on triangulation of facts which requires sufficient evidence in order to find a factory in non-compliance on a particular compliance point and some issues are not always easy to detect. Although concerns regarding sexual harassment persist, Better Work Haiti has seen positive developments on the topic with factories acknowledging the issue as a potential problem and demonstrating an increased openness to address it. Several factories are therefore working on prevention of sexual harassment in the workplace. In particular, Better Work's supervisory skills training has contributed to raise awareness of this issue among supervisors in more than half of the factories in Haiti.

Simple auditing of factory compliance has been widely acknowledged to be limited in rectifying compliance issues. Factories wishing to not disclose certain information are able to do so without focusing on the long-term business benefits of improving their working conditions. This is why Better Work's approach at the factory level is much broader in its scope focusing on continuous improvements through advisory and training services, emphasizing the importance of effective systems and the involvement of workers.



Annex 4: Factories in Detail

List of Factories

Below is the list of factories that have been assessed by Better Work Haiti over the past two cycles. All factories that have been assessed by Better Work more than twice are included in the data analysis and also included in the factory tables in annex 4 of this report. Please note that if an already assessed factory closed, their individual level compliance data is no longer included in this section.

Table 3: List of factories in the Haitian apparel sector which have been assessed between April 2017 and March 2018

	Name of factory
1	Caribbean Island Apparel S.A.
2	Cleveland Manufacturing S.A. (former GMC)
3	CODEVI
4	Everest
5	Fairway Apparel S.A.
6	Go Haiti S.A.
7	H4H
8	H&H Textiles S.A.
9	Haiti Premier Apparel S.A.
10	Hansae
11	Horizon Manufacturing S.A.
12	Interamerican Wovens APH S.A.
13	Interamerican Wovens S.A.
14	Life S.A.



15	MAS Akansyel
16	MGA Haiti S.A
17	Modas BU IL Haiti S.A.
18	Pacific Sports Haiti S.A.
19	Palm Apparel S.A.
20	Premium Apparel S.A.
21	Quality Sewing MFG. S.A.
22	S&H Global S.A.
23	Sewing International S.A.
24	The Willbes Haitian II S.A.
25	The Willbes Haitian III S.A.
26	The Willbes Haitian II B S.A.
27	The Willbes Haitian Print Shop S.A.
28	Val D'Or Apparel MFG Haiti S.A.

Findings from the Factories

This section reports on the detailed factories' compliance performance as required by the HOPE II legislation. The HOPE II legislation requires the entity implementing the TAICNAR program (the ILO) to publish a biannual report with specific information on factories' compliance performance. The report is supposed to cover the preceding 6-months period and should include detailed compliance information for each individual producer (see annex 1 for the exact requirements of the HOPE II legislation.), including the details of non-compliance points identified, efforts of the producer to remediate the non-compliance points as well as the time elapsed since the deficiencies have first been identified. This information is captured in the factory tables in the following section.

Better Work measures compliance with international core labor standards and national labor laws in a set of 8 clusters during its unannounced annual assessment visits. Under each cluster, several compliance points are assessed and each compliance point consists of individual issues that are verified during



each Better Work compliance assessment. The list of compliance clusters, compliance points and issues can be found in the reference table in annex 3. The issues under each compliance point again usually break down into several questions. The full list of all questions of the compliance assessment tool (CAT) used by Better Work Haiti can be accessed online⁴. When a compliance point is not listed, it means that the factory has been in compliance on this point in both of its last two assessments by Better Work. The reference point is always the full list of compliance points and issues listed in annex 3. A factory needs to have been assessed at least two times before its information will be published in a factory table in this report. The columns in the tables correspond to specific reporting requirements of the HOPE legislation and provide additional information as follows:

- ◆ Details on the non-compliance identified by EAs: the information included in this column constitutes the issues where evidence of non-compliance was found in one of the last two assessments conducted by Better Work at each particular factory (the date of the last two assessments is equally indicated for each factory on top of its table).
- ◆ Improvement priorities identified by the factory;
- ◆ Efforts made by the factory to remedy the compliance needs as verified in the most recent assessment or advisory visit;
- ◆ With respect to non-compliance areas that have not been remediated, the amount of time that has elapsed since the non-compliance has been first identified at this factory.

Additional information also corresponding to HOPE II reporting requirements is provided in the section above each table, e.g. advisory and training services provided by Better Work.

⁴ http://betterwork.org/haiti/?page_id=1731



Factory: Caribbean Island Apparel S.A.
Location: Port-au-Prince
Number of workers: 2376
Date of registration: Sep-09
Date of last two Better Work Dec-16 Jan-18

Advisory Visits and Training Services.

3-Oct-18 Sexual Harassment Awareness and Prevention Supervisors & Middle Management
 3-Oct-18 Sexual Harassment Awareness and Prevention Workers
 12-Sep-18 1. Advisory visit to discuss bipartite committee meeting minutes for July and August with HR and compliance manager 2. Conducted Factory tour to hunt for new for potential new
 28-Jun-18 Advisory visit to discuss guidance for completion of progress Report 1 and Improvement Plan with compliance manager. OSH tour to hunt for potential Hazard with compliance manager. Meeting to discuss high temperature levels with president of OSH committee and compliance manager.
 23-May-18 Advisory visit to review the Improvement plan with HR and Compliance manager. Performed factory tour for Hazard hunting with HR and Compliance manager. PICC meeting.
 5-Apr-18 PICC meeting and review of the improvement Plan to update on progress. Review of documentation related to compensation and break for pregnant women. Factory tour to discover potential OSH hazards.
 31-Jan-18 OSH committee meeting to conduct the OSH self-diagnosis. Factory tour performed to identify potential new hazards and validate corrections of previous OSH issues on the floor. Review of the latest assessment report with the HR & Compliance manager to determine remediation actions.

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDIATION EFFORTS	MONTHS
Assessment January 2018						
Jan-18	Occupational Safety and Health	Worker Protection	Missing machine guards.	Install all missing machine guards and ensure that they are properly maintained.	Management is proactively collaborating with workers, supervisors and mechanics to repair and maintain machine guards in a timely manner.	40
Jan-18	Occupational Safety and Health	Worker Protection	Electrical installations not properly maintained.	Ensure that electrical installations are properly maintained.	In progress. Management has adopted a consistent maintenance schedule of electrical installations.	9
Jan-18	Occupational Safety and Health	Working Environment	Workplace temperature exceeded recommended limits.	Reduce workplace temperature.	Management has placed purchase orders of exhaust fans to be installed in the ceilings to draw out the heat emanating from the factory floor.	70
Jan-18	Occupational Safety and Health	OSH Management Systems	OSH policy has not been developed in consultation with workers and their representatives.	Review OSH policy with workers representatives and include compliance with labor law requirements pertaining to OSH.	Management is in the process of translating OSH policy into both local languages to facilitate eventual consultation with worker representatives.	9

Jan-18	Occupational Safety and Health	Chemicals and Hazardous Substances	No updated inventory for some chemicals and hazardous substances used in the workplace.	Maintain an updated inventory for all chemicals and hazardous substances used in the workplace.	Management keep an updated inventory management system of chemicals and hazardous substances.	9
Jan-18	Occupational Safety and Health	Working Environment	Insufficient light levels in the workplace.	Improve the lighting level in the workplace.		9
Jan-18	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets.	Increase the number of toilets and maintain the existing ones.		64
Jan-18	Occupational Safety and Health	Health Services and First Aid	The factory does not provide workers health checks within the first three months of hiring.	Provide workers health checks within the first three months of hiring.	OFATMA has started medical checks at the factory.	9
Jan-18	Occupational Safety and Health	Health Services and First Aid	The factory does not provide workers with annual health checks.	Provide workers with annual health checks.	OFATMA has started medical checks at the factory.	9
Jan-18	Occupational Safety and Health	Health Services and First Aid	The factory does not properly address safety and health risks to pregnant workers.	Address safety and health risks to pregnant workers by providing required breaks.	Breaks are now being offered to pregnant workers. Supervisors signed to respect this rule.	9
Jan-18	Occupational Safety and Health	Health Services and First Aid	Insufficient medical staff.	Hire additional medical staff.	Factory increased nurses to 13 and maintained 3 doctors visits as recommended by the labor code.	22
Jan-18	Occupational Safety and Health	Health Services and First Aid	Less than 10 percent of the workforce trained in first aid.	Train at least 10 percent of the workforce in fist aid.	In progress. Management has planned additional trainings for workers on first aid to reach 10% target	9
Jan-18	Occupational Safety and Health	Emergency Preparedness	The current evacuation plans in one building is not updated to indicate the actual escape routes.	Update all evacuation plan to reflect the current layout of the workplace.	The current evaluation has been updated to indicate the actual escape routes according to the recently reorganized floor layout	9
Jan-18	Occupational Safety and Health	Emergency Preparedness	Flammable materials were stored close to the lighting lamps in a small warehouse.	Ensure that flammable materials are stored safely.	Flammable materials are stored properly away from possible sources of ignitions.	9
Jan-18	Occupational Safety and Health	Chemicals and Hazardous Substances	Unidentified bottles of chemicals and hazardous substances were found in the workplace.	Label all containers of chemicals and hazardous substances.	Advisor did not observe unlabeled containers during subsequent visits after assessment	9
Jan-18	Occupational Safety and Health	Chemicals and Hazardous Substances	Missing MSDS in areas where chemicals and hazardous substances are used or stored.	Display MSDS for all chemicals and hazardous substances.	MSDS have been posted in the workplace.	9
Jan-18	Occupational Safety and Health	Chemicals and Hazardous Substances	No eye wash station available for chemicals stored in the spare parts department.	Install eye wash station in the spare parts department.	A functioning eye wash is installed in the spare parts department	9

Assessment December 2016						
Dec-16	Compensation	Paid Leave	Payments for legally mandated holidays are inaccurate for piece rate workers.	Ensure that the compensation for legally mandated holidays are accurate.	Factory compensated legally mandated holidays on the basis of average earnings.	28
Dec-16	Compensation	Paid Leave	Payments for sick leave are inaccurate for piece rate workers.	Ensure that sick leave payments are accurate.	Factory compensated legally mandated holidays on the basis of average earnings.	28
Dec-16	Compensation	Paid Leave	Payments for maternity leave are inaccurate for piece rate workers.	Ensure that maternity leave payments are accurate.	Factory compensated legally mandated holidays on the basis of average earnings.	28
Dec-16	Compensation	Social Security and Other Benefits	The factory has not registered with OFATMA for maternity and health insurance services.	The factory should register with OFATMA for maternity and health insurance services.	The factory has started to collect the workers' files to initiate the registration process with OFATMA.	28
Dec-16	Compensation	Social Security and Other Benefits	The factory has not registered with OFATMA for maternity and health insurance services.	The factory should register with OFATMA for maternity and health insurance services.	The factory has registered with OFATMA and is in the process of collecting and forwarding payments for insurance services.	28
Dec-16	Occupational Safety and Health	Health Services and First Aid	The factory has an insufficient number of onsite medical staff.	Hire more onsite medical staff in order to comply with the Haitian Labor Code.	The factory had 9 nurses. One nurse has already been hired and the factory is in process to hire 2 more.	16
Dec-16	Occupational Safety and Health	Welfare Facilities	The factory does not have an adequate number of toilets for the workers.	Provide an adequate number of toilets in proportion to the total workforce as stipulated by the Haitian Labor code.	No progress. Factory is not considering adding new toilets. No lines are observed by the toilets during advisory visits.	58
Dec-16	Occupational Safety and Health	Worker Protection	No pulley guards were installed on the factory's old Union Special sewing machines and the single needle machines.	Install and maintain proper guards on all the dangerous moving parts of machines and equipment.	The factory has ordered new machines and is in the process of installing pulley guards on the single needle machines.	34
Dec-16	Occupational Safety and Health	Working Environment	Temperatures of over 30 C have been recorded in some of the sections within the workplace.	Ensure that temperature and ventilation levels at the workplace are maintained properly.	Additional fans have been added throughout the workplace and during an advisory session, the temperature levels were also verified to be within the recommended limits (around 27-28 C).	66



Factory: Cleveland Manufacturing S.A.
Location: Port-au-Prince
Number of workers: 1619
Date of BW registration: Nov-09
Date of last two Better Work assessments: Jan-17 Jan-18

Advisory and Training Services

29-Jun-18 Training on Chemical Management System.

31-Jul-18 Advisory visit to review the training plan, follow up on the first progress report also the establishment of the OSH and bipartite committee. Meeting with management to review the improvement plan.

26-Apr-18 Advisory visit to follow up on the current status of the bipartite committee. Factory tour to verify and validate the status of OSH issues. Meeting with management to review the following points: paid leave, Social security and other benefits, Employment Contract, Chemicals and hazardous substances, Emergency Preparedness /Health services and first Aid.

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDATION EFFORTS	MONTHS
Assessment April 2018						
Jan-18	Working Time	Paid Leave	Payments for non-working holidays are based on the minimum wage instead of average earnings.	Ensure non-working holidays' payments are based on average earnings.	The new regulation eliminated the requirement to pay non-working holidays.	20
Jan-18	Working Time	Paid Leave	Payments for weekly rest days are based on the minimum wage instead of average earnings.	Ensure Weekly rest days' payments are based on average earnings.	The new regulation eliminated the requirement to pay non-working holidays.	20
Jan-18	Compensation	Social Security and Other Benefits	Employer contribution to ONA is less than 6 percent of workers' base salaries.	Forward employer contribution to ONA based on base salary.		20
Jan-18	Compensation	Social Security and Other Benefits	Collecting and forwarding workers' contributions for social insurance funds to ONA.	Collect and forward workers' contribution to ONA based on base salary.		20
Jan-18	Compensation	Social Security and Other Benefits	The last payment for OFATMA work-related accident insurance was done for the previous fiscal year.	Register with OFATMA work related accident for the fiscal year.		20
Jan-18	Compensation	Social Security and Other Benefits	The factory has not yet registered with OFATMA for maternity and health insurance.	Register with OFATMA for maternity and health insurance services.		20

Jan-18	Compensation	Social Security and Other Benefits	Collecting and forwarding of workers' contributions to OFATMA for maternity and health insurance.	Register with OFATMA. Collect and forward workers' contributions to OFATMA for maternity and health insurance services.		20
Jan-18	Compensation	Wage Information, Use and Deduction	Time records of hours worked on Sundays are not entered in the payroll and are paid separately.	Ensure that hours worked on Sundays are registered in the payroll.		8
Jan-18	Contract and Human Resources	Employment Contracts	The contracts issued in 2017 did not specify the employee's position as required by law.	Include the required contents into the contracts.	Employment contract has been modified.	8
Jan-18	Occupational Safety and Health	Chemicals and Hazardous Substances	Chemicals and hazardous substances such as K7M used in the spot cleaning area are not properly labeled.	Label all chemicals.	Containers are labelled	20
Jan-18	Occupational Safety and Health	Chemicals and Hazardous Substances	Chemicals were not stored properly in the chemical room.	Have a designated area to store chemicals, and ensure that the storage area is properly ventilated.		20
Jan-18	Occupational Safety and Health	Chemicals and Hazardous Substances	No MSDSs were posted in the chemical room near the printing building where chemicals are stored.	Prepare and post MSDS where chemicals are used.		20
Jan-18	Occupational Safety and Health	Chemicals and Hazardous Substances	Management did not isolate the use of chemicals and did not install exhaust ventilation.	Ensure that workers are protected from the use of chemicals.		8
Jan-18	Occupational Safety and Health	Chemicals and Hazardous Substances	There were no eye wash stations in the chemical room, the mechanic room of building AGC as well as in the generator room where chemicals are stored.	Install eye wash station where chemicals are stored.	Eye wash station has been installed	20
Jan-18	Occupational Safety and Health	Worker Protection	Management did not provide gloves and goggles for workers in the spot cleaning area using VLR remover.	Ensure that all PPE are available in the workplace.		20
Jan-18	Occupational Safety and Health	Worker Protection	Standing workers in the packing area near the cutting room were not provided with foot rests or shock absorbing mats.	Provide standing mats to the standing workers.	The standing mats have been distributed to standing workers	20

Jan-18	Occupational Safety and Health	Worker Protection	About 30 percent of all sewing machines in AGC and Medicon buildings were missing finger guards and pulley guards.	Install missing finger guards and pulley guards on the sewing machines.	The factory starting to installed the guards.	20
Jan-18	Occupational Safety and Health	Worker Protection	Assessors observed 2 uncovered electrical boxes with exposed wires in the cafeteria.	Ensure that electrical panels are properly maintained.	The electrical panels have been fixed.	8
Jan-18	Occupational Safety and Health	Working Environment	Workplace temperature exceeds BW recommended limit of 30 C.	Ensure that the temperature does not exceed the recommended limit.		20
Jan-18	Occupational Safety and Health	Working Environment	Workplace lighting insufficient.	Improve the Lux level in the workplace.		20
Jan-18	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets	Increase the number of toilets.		20
Jan-18	Occupational Safety and Health	Welfare Facilities	Soap was not available in the AGC building and workers complained about that.	Ensure that soap are available at all times.		8
Jan-18	Occupational Safety and Health	Health Services and First Aid	The factory did not show evidence of annual medical checks for workers.	Provide annual medical checks for workers.		20
Jan-18	Occupational Safety and Health	Health Services and First Aid	The factory did not provide health checks to workers who have been exposed to work-related hazards.	Provide health checks to workers who have been exposed to work-related hazards.		20
Jan-18	Occupational Safety and Health	Health Services and First Aid	The factory does not provide workers health checks within the first three months of hiring.	Provide workers health checks within the first three months of hiring.		20
Jan-18	Occupational Safety and Health	Health Services and First Aid	Insufficient medical staff	Increase the number of medical staff in the workplace.		20
Jan-18	Occupational Safety and Health	Health Services and First Aid	Workers trained in first aid represent less than 10 percent of the workforce	Provide training to at least 10 percent of the workforce in First-aid.		20
Jan-18	Occupational Safety and Health	Emergency Preparedness	Access to 1 alarm system was obstructed by boxes in the cutting building. Furthermore, the alarm system in the printing building is not working.	Ensure that the workplace has a functioning alarm system.	The alarms have been installed.	8
Jan-18	Occupational Safety and Health	Emergency Preparedness	Fire extinguishers not easily accessible.	Ensure that access to fire extinguishers remain unobstructed in the workplace.		20

Jan-18	Occupational Safety and Health	Emergency Preparedness	Workers trained in firefighting equipment represent less than 10 percent of the workforce.	Train at least 10 percent of the workforce in firefighting equipment.		20
Jan-18	Occupational Safety and Health	Emergency Preparedness	The current evacuation plans in the cutting and fabric warehouse buildings have not been updated to indicate the actual escape routes according to the recently reorganized floor layout.	Update the current evacuation plan.	The evacuation plan have been updated.	8
Jan-18	Occupational Safety and Health	Emergency Preparedness	Emergency drills were not conducted every 6 months.	Conduct 2 emergency drill per year as recommended by BW.	The factory has made 3 fire drills	8
Jan-18	Occupational Safety and Health	Emergency Preparedness	Sources of ignition not properly safeguarded.	Ensure that sources of ignition are safeguarded	Sources of ignition are safeguarded	8
Jan-18	Working Time	Leave	Breastfeeding break is not systematically granted.	Provide Breastfeeding break to all eligible workers.	They have developped a policy and workers are aware of it	8
Jan-18	Occupational Safety and Health	OSH Management Systems	The OSH policy does not refer to compliance with labor law requirements pertaining to OSH.	Develop an OSH policy.		8
Assessment January 2017						
Jan-17	Compensation	Social Security and Other Benefits	The calculation of the ONA deductions are based on a 5-day work week instead of the base salary.	Ensure that ONA payments are based on the base salary.		
Jan-17	Compensation	Social Security and Other Benefits	The ONA payments are not made on time.	Ensure that the ONA payments are accurate and submitted on time.		
Jan-17	Compensation	Social Security and Other Benefits	The factory is not registered with OFATMA for work-related accidents for the 2016-2017 fiscal year.	Register with OFATMA for work-related accidents.	Employees are registered and payment is effective.	
Jan-17	Compensation	Social Security and Other Benefits	The factory is not registered with OFATMA for maternity and health insurance services (workers' contributions).	Register with OFATMA for maternity and health insurance services.		
Jan-17	Compensation	Social Security and Other Benefits	The factory has not yet registered with OFATMA for maternity and health insurance services (employer's contributions).	Register with OFATMA for maternity and health insurance services.		

Jan-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Unlabeled chemical containers were found in the workplace	Ensure that all containers are identified and safely stored. Establish a procedure for proper chemical management.	The containers were labeled during the assessment visit.	
Jan-17	Occupational Safety and Health	Chemicals and Hazardous Substances	No MSDS' were posted for chemicals used in the ink mixing area.	Provide MSDS' for all the hazardous chemicals used in the workplace.		
Jan-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Documented evidence of actions taken by management to control and oversee workers' exposure to chemicals and hazardous substances were unavailable.	Keep records of action taken to control and oversee workers' exposure to chemicals and hazardous substances.		
Jan-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Proof of chemical safety training conducted for workers were unavailable during the assessment.	Keep records of chemical safety training sessions conducted for workers.		
Jan-17	Occupational Safety and Health	Chemicals and Hazardous Substances	No eye washing facilities were provided for workers exposed to hazardous chemicals in the printing section.	Provide adequate washing facilities and cleansing materials in the event of exposure to hazardous chemicals.	The factory installed additional eye wash stations in areas where workers are exposed to chemicals.	
Jan-17	Occupational Safety and Health	Worker Protection	No protective equipment were provided to workers in the generator room where there is a high level of noise and in the spot cleaning area on the sewing floor.	Provide workers with all the necessary personal protective clothing and equipment.		
Jan-17	Occupational Safety and Health	Worker Protection	PPE training records were unavailable.	Keep record of PPE training sessions conducted for workers.	The factory provided training to workers while giving the PPE. Workers signed that they received the training and the PPE.	
Jan-17	Occupational Safety and Health	Worker Protection	Shock absorbing mats were not provided for several standing workers in the inspection area.	Provide shock absorbing mats for standing workers.		
Jan-17	Occupational Safety and Health	Worker Protection	More than 30 percent of all machines were missing pulley guards. All the single needle machines were missing finger guards.	Install guards on all dangerous moving parts of machines and equipment.	Monthly inventory is performed since then and guards are installed progressively.	
Jan-17	Occupational Safety and Health	Worker Protection	The electrical distribution boxes were not well maintained as 3 boxes were left uncovered and 2 boxes were obstructed. In the printing area, welding work was being conducted with exposed wires.	Ensure that all electrical wires, switches and plugs are properly installed, grounded and maintained.	All electrical wires, switches and plugs are properly installed, grounded and maintained.	

Jan-17	Occupational Safety and Health	Working Environment	Temperatures throughout the factory exceed the BW recommended maximum limit of 30 C.	Keep the workplace temperature under 30 C.	The factory has ordered a measuring tool to monitor the temperature level and take decisions accordingly.	
Jan-17	Occupational Safety and Health	Working Environment	Several sections at the workplace were inadequately lit.	Lighting levels should be increased.	The factory has ordered a measuring tool to monitor the light level and take decisions accordingly.	
Jan-17	Occupational Safety and Health	Welfare Facilities	The factory has 17 functioning toilets for women and 15 toilets for men. With its current workforce, the factory should have 19 functioning toilets for men and 66 functioning toilets for women.	Comply with the labor code recommendations regarding the total number of toilets.		
Jan-17	Occupational Safety and Health	Health Services and First Aid	No systematic medical checks were arranged for newly hired workers within the first three months of employment.	Provide medical checks to workers within the first three months of hiring.		
Jan-17	Occupational Safety and Health	Health Services and First Aid	No systematic medical checks were arranged for workers who have been exposed to work-related hazards.	Provide systematic medical checks to workers exposed to work-related hazards.		
Jan-17	Occupational Safety and Health	Health Services and First Aid	No systematic annual medical checks were arranged for workers.	Provide systematic annual medical checks for all workers.		
Jan-17	Occupational Safety and Health	Health Services and First Aid	The factory has 2 full time nurses and 1 doctor's visit per week.	To comply with the Haitian labour code, a factory of this size must have a permanent on site medical service, with at least 7 nurses and 3 doctor's visits per week.	The factory is building a new infirmary and one onsite doctor will perform general medical checks for 2 or 3 days a week.	
Jan-17	Occupational Safety and Health	Health Services and First Aid	Only 33 workers were trained in first-aid.	To comply with the Haitian Labour Code, a factory of this size must have at least 144 workers trained in first-aid.		
Jan-17	Occupational Safety and Health	Emergency Preparedness	The alarm system is not working in the printing area and the fabric warehouse. The obstructed smoke detector in cutting area was corrected during the assessment.	Ensure the workplace has adequately functioning fire detection and alarm systems.		

Jan-17	Occupational Safety and Health	Emergency Preparedness	6 fire extinguishers were inspected in 2014 and did not have any maintenance logs attached. Another fire extinguisher had inadequate pressure. The 6 fire extinguishers from 2014 were removed during the assessment.	Maintain adequately functioning fire-fighting equipment.	Non functional fire extinguishers were removed and repaired.	
Jan-17	Occupational Safety and Health	Emergency Preparedness	Only 63 workers were trained in fire fighting.	A factory of this size must have at least 144 workers trained in fire-fighting.	Twice a year a group of employees are trained. Past months, the National Fire Brigade has trained 25-30 employees. At the end of the year, another group will be trained.	
Jan-17	Occupational Safety and Health	Emergency Preparedness	No evacuation maps were posted in the printing area and the fabric warehouse. The evacuation map posted in the inspection and pressing areas need to be updated.	Post accurate evacuation maps around the workplace.	Engineering department has submitted a draft of the evacuation plan for approval.	
Jan-17	Occupational Safety and Health	Emergency Preparedness	2 out of the 3 exits on the printing floor were obstructed and the exit lights were not working. Another exit on the cutting floor was obstructed by a car.	Ensure that the emergency exits are accessible, unobstructed and unlocked during working hours, including overtime.	Emergency exist are accessible.	
Jan-17	Working Time	Regular Hours	Authorization from the Department of Labour before working at night	Request the authorization to work at night from MAST.	Situation is regularized. The factory requests for authorization to work at night if they scheduled so and they do not perform the overtime without the authorization.	
Jan-17	Working Time	Overtime	Workers had worked more than 80 hours of overtime during the May to July 2016 trimester.	Comply with the Haitian labor code on overtime work.	The factory limits the number of overtime hours.	
Jan-17	Working Time	Overtime	An authorization to work overtime during November 2016 to January 2017 was not obtained from the Department of Labour.	Obtain prior authorization from MAST for overtime work.	The factory requested the required authorization.	



Factory: CODEVI
Location: Ouanaminthe
Number of workers: 7800
Date of BW registration: 24-Sep-09
Date of last two Better Work assessments: Jan-18 Oct-16

Advisory and Training Services

6-Sep-18 Industry Seminar on Risk Management & Control
 28-Aug-18 Bipartite Committee (PICC/LKSB/PC) Training
 28-Aug-18 PICC Meeting with FW and Brand M committees. Factory tour.
 27-Aug-18 Advisory visit to review the improvement plan with management and conduct factory tour.
 19-Jun-18 Training on Emergency preparedness and Accident investigation.
 18-Jun-18 Training on OSH assessment checklist and OSH factory tour.
 8-Jun-18 Review of the improvement plan with the compliance team. PICC meeting with Brand M and FWI (OSH improvement plan). Meeting with the union SOKAWA and SOFEZO on the mass layoff at CODEVI.
 5-Jun-18 Factory tour with compliance team at FWI, MD Industries, Superior. Meeting with Superior management team on identified issues and involvement in Better work activities. Debriefing with Compliance team on identified issues in order to identify possible solutions.
 15-May-18 Compliance Assessment Tool Training
 14-May-18 Industry Seminar on Chemical Management System
 13-Apr-18 Occupational Safety and Health (OSH) Training

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDATION EFFORTS	MONTHS
Assessment April 2018						
Jan-18	Compensation	Overtime Wages	Several workers categorized as apprentices were subjected to overtime hours but receive only the apprentice salary, which is 40% of the minimum wage with no compensation for the overtime hours worked.	Ensure that apprentices are properly paid for all hours worked.	The company revised its procedures to ensure that all employees including apprentices are paid according to the requirements of the law	24
Jan-18	Compensation	Method of Payment	Wage deduction should not exceed 1/6 of workers monthly earnings.	Ensure that salary deductions do not exceed 1/6 of workers earnings.		9
Jan-18	Compensation	Paid Leave	Permanent workers were not compensated for Sunday after 6 consecutive days or 48 hours worked.	Ensure that workers are compensated in line with the legal requirements.		84

Jan-18	Compensation	Paid Leave	Annual leave payment is incorrect.	Ensure that annual leave calculations include all the workers' earnings.		24
Jan-18	Compensation	Paid Leave	Sick leave payment is incorrect.	Ensure that sick leave payments are based on average workers' earnings.	The internal regulation and the CBA has been updated. The factory has started to provide adequate payment for sick leave to all eligible workers.	84
Jan-18	Compensation	Paid Leave	Maternity leave payment is incorrect.	Ensure that maternity leave payments are based on average workers' earnings	The internal regulation and the CBA has been updated. The factory has started to provide adequate payment for maternity leave to all eligible workers.	84
Jan-18	Compensation	Social Security and Other Benefits	Employer contribution to ONA was not paid on time.	Ensure that ONA payments are accurate and on time for all buildings		24
Jan-18	Compensation	Social Security and Other Benefits	Workers' contribution to ONA was not paid on time.	Ensure that ONA payments are accurate and on time for all buildings		24
Jan-18	Compensation	Social Security and Other Benefits	OFATMA payment for work-related accident insurance was not made for the fiscal year 2017-2018.	Pay the work related accident insurance for the fiscal year 2017-2018	CODEVI paid the OFATMA until the month of september 2018.	84
Jan-18	Compensation	Social Security and Other Benefits	The factory has not registered with OFATMA for maternity and health insurance.	Register with OFATMA for maternity and health insurance		36
Jan-18	Compensation	Social Security and Other Benefits	The factory has not registered with OFATMA for maternity and health insurance.	Register with OFATMA for maternity and health insurance		36
Jan-18	Compensation	Social Security and Other Benefits	The payment amount for the annual bonus is incorrect.	Ensure that the annual bonus calculation is based on total workers earnings		24
Jan-18	Contract and Human Resources	Employment Contracts	Apprentices were found to have contracts that are not approved by MAST as required by law.	Ensure that the apprenticeship program is approved by MAST		24
Jan-18	Contract and Human Resources	Employment Contracts	The internal work rules are not yet approved by the Ministry of Social Affairs and Labour.	Follow up with MAST for the approval of internal work rules.	The factory posted the current version of the internal work rules in all buildings.	24

Jan-18	Occupational Safety and Health	OSH Management Systems	Assessment of general occupational safety and health issues was not completed in all facilities.	Conduct a general occupational safety and health assessment for all buildings.	CODEVI hired additional compliance officer for FW, Mazava, brandM, MD, to conduct general OSH assessment on a regular basis.	9
Jan-18	Occupational Safety and Health	Chemicals and Hazardous Substances	No inventory of chemical substances used in the workplace were provided for three facilities.	Keep an accurate and updated inventory for all chemicals used in the workplace.		24
Jan-18	Occupational Safety and Health	Chemicals and Hazardous Substances	Some chemicals containers did not have any kind of labeling or the labeling was in a foreign language.	Ensure that all chemicals are properly labeled. Train workers and managers on proper chemical handling.	All chemical containers were labeled correctly.	96
Jan-18	Occupational Safety and Health	Chemicals and Hazardous Substances	Chemical storage area has not been properly built in one of the factories.	Ensure that all chemicals are properly stored. Train workers and managers on proper chemical handling.	The factory has ensured that all chemicals and hazardous substances used in the factory are stored properly.	96
Jan-18	Occupational Safety and Health	Chemicals and Hazardous Substances	During the assessment it was observed that no MSDS were available for several chemicals substances used in the workplace.	Ensure that all required MSDS are available in local language for all chemicals used in the workplace. Train workers and managers on proper chemical handling.	All the missing MSDS' have been posted in the Stock room and in each station where they are using the chemicals.	96
Jan-18	Occupational Safety and Health	Chemicals and Hazardous Substances	During the assessment it was observed that no eyewash stations were installed in 6 locations where chemicals are used.	Install proper eye wash stations in all areas where chemicals are used in the workplace.	Eye washing stations have been provided in the following area : stock room, washing stations and stamping stations.	96
Jan-18	Occupational Safety and Health	Worker Protection	During the assessment it was observed that PPE were not provided to all workers exposed to hazards.	Ensure that workers are provided with all required PPEs. Provide PPE training as required.	Management has identified the staff in charge of providing and renewing the PPEs for each factory and updated the PPE regulation (based on MSDS and hazard inventory). All employees have been provided with the necessary personal protective clothing and equipment. Training on the proper use of PPE has also been conducted for workers.	96

Jan-18	Occupational Safety and Health	Worker Protection	Workers' chairs were found in poor conditions in four facilities.	Provide workers with chairs with backrest.	CODEVI has been gradually investing to replace the chairs at the factory and 95% of them have already been changed. Management expects to change the remaining chairs in the near future.	96
Jan-18	Occupational Safety and Health	Worker Protection	Machine safety guards were missing.	Ensure that all machines and equipment are equipped with the required safety guards.	CODEVI defined staff in charge of maintaining machine guards for each factory and all machines have been equipped with the required safety guards.	96
Jan-18	Occupational Safety and Health	Worker Protection	Exposed electrical wires and open electrical boxes with exposed wires in three facilities.	Ensure that all electrical installation are properly maintained.	The factory posted additional safety warnings in the noted areas. Appropriate safety warnings are posted on all plants. The factory installed dielectric carpet below the electrical panel in AM2.	9
Jan-18	Occupational Safety and Health	Worker Protection	Electrical installation not properly marked.	Ensure that all electrical installation are properly maintained and identified.		9
Jan-18	Occupational Safety and Health	Working Environment	Temperature levels exceeded 30 C.	Keep the workplace temperature below 30 C.	The factory installed a cooling system in AM2 and Mazava. Also, more fans and heat extractors were added in FW. A cooling system will be installed in FW to reduce the temperature levels.	36
Jan-18	Occupational Safety and Health	Working Environment	Noise levels exceeded 90 Db.	Keep the workplace noise level below 90 Db.		9
Jan-18	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets.	Increase the number of toilets.	All bathrooms are maintained clean and functional.	96
Jan-18	Occupational Safety and Health	Welfare Facilities	Missing soap in toilets.	Ensure that soap is always available during working hours.	The factory has provided adequate soap and water in all the toilets.	96
Jan-18	Occupational Safety and Health	Welfare Facilities	Insufficient seating in eating area.	Build additional eating area for workers.	The factory is building a modern cafeteria and kitchen for cooks.	96

Jan-18	Occupational Safety and Health	Health Services and First Aid	No medical checks for workers exposed to work-related hazards were provided for workers in 3 facilities.	Provide free medical health checks for workers at BKL, Top Choice and Superior within the first three months of hiring.	The factory conducts medical checks for all newly hired workers and regular medical follow ups for employees performing hazardous work. All factory staff also have access to extensive medical, cardiovascular, dental, visual laboratory and operations services.	96
Jan-18	Occupational Safety and Health	Health Services and First Aid	No medical checks at hiring were provided for workers in 3 facilities.	Provide free annual checks for all workers exposed to work-related hazards twice a year in all factories.	The factory started to provide annual medical checks for all workers and the corresponding medical records are also available to support this.	96
Jan-18	Occupational Safety and Health	Health Services and First Aid	No evidence of annual medical checks for all workers was presented.	Provide free annual checks for all workers once a year in all factories.		96
Jan-18	Occupational Safety and Health	Health Services and First Aid	Insufficient medical staff.	Increase the number of nurses.		96
Jan-18	Occupational Safety and Health	Health Services and First Aid	First aid boxes not properly equipped in some locations.	Ensure that first aid boxes are available and properly supplied in all factories.	First aid boxes were installed in all CODEVI's and Brand M buildings.	96
Jan-18	Occupational Safety and Health	Health Services and First Aid	Insufficient number of workers trained in first aid.	Train at least 10 percent of workforce in first aid.	Additional workers were trained in first-aid.	96
Jan-18	Occupational Safety and Health	Emergency Preparedness	No fire detectors have been installed in 3 areas and no smoke detector were installed in three others.	Install adequate fire extinguishers and smoke detectors as required in all buildings.		24
Jan-18	Occupational Safety and Health	Emergency Preparedness	Fire extinguishers not properly maintained.	Keep all fire extinguishers properly maintained.	The factory installed a sufficient number of fire extinguishers at the workplace. The maintenance service provider has also been instructed to regularly check and replace non-functional fire-fighting equipment.	24
Jan-18	Occupational Safety and Health	Emergency Preparedness	Insufficient number of workers trained in fire fighting.	Train 10 percent of the workforce to use the fire-fighting equipment.	The factory has provided fire-fighting training to 10% of the workforce. The employer has a	96
Jan-18	Occupational Safety and Health	Emergency Preparedness	Escape routes not properly marked in two buildings.	Mark the escape routes in all buildings.		96

Jan-18	Occupational Safety and Health	Emergency Preparedness	Emergency routes and/or exits obstructed or not clearly marked in five out of seven buildings.	Keep the aisles clear in all buildings.	Regular inspections are conducted to ensure that all emergency exits are accessible, unobstructed and unlocked at all times.	96
Jan-18	Occupational Safety and Health	Emergency Preparedness	Emergency drills not conducted every 6 months in all buildings.	Conduct emergency drills for all buildings.	As recommended, management is currently conducting periodic emergency drills for each factory every 6 months. MD made Emergency drills for this year Brand M made Emergency drills for this year	96
Jan-18	Occupational Safety and Health	Emergency Preparedness	Cell phones were being charged inappropriately throughout the workplace near highly flammable substances.	Keep all possible sources of ignition safeguarded. Provide workers with cell phone charging station.		24
Jan-18	Working Time	Regular Hours	Not all hours worked on Saturday are reflected in the attendance records.	Ensure that all working hours are properly recorded and compensated.		24
Jan-18	Working Time	Overtime	Workers in the packing, shipping and loading session were found to have completed up to 215 hours overtime per trimester.	Reduce the number of overtime hours.		84
Assessment October 2016						
Oct-16	Discrimination	Gender	One case of sexual harassment has been found in the workplace.	Provide training to raise workers awareness on ways to prevent and address sexual harassment at the workplace. Train supervisors and managers on the company regulations regarding sexual harassment. Update the policy on sexual harassment to include mandatory training for workers and managers and strengthen reporting options and investigation processes.	The factory has included information on their sexual harassment policy in the induction training for all new workers. Training has also been provided to old workers.	
Oct-16	Freedom of Association and Collective Bargaining	Collective Bargaining	The CBA is not fully implemented.	Review the CBA with the union and implement all the provisions agreed upon accordingly.	A new CBA is being negotiated.	

Oct-16	Compensation	Overtime Wages	Extra hours of work performed on Saturday and Sunday are not adequately paid.	Ensure that work on weekly rest days are conducted with prior authorization from MAST and compensated properly.		
Oct-16	Compensation	Premium Pay	Working hours completed during night shift were not paid at 100 percent above normal wage, as required.	Properly compensate workers for hours worked at night.		
Oct-16	Compensation	Wage Information, Use and Deduction	Time records did not correlate between the payroll and attendance records.	Review the payroll and attendance recording systems to ensure consistency in records and to accurately reflect the actual working hours.		
Oct-16	Compensation	Paid Leave	Several workers worked for more than 48 hours even within 5 working days or less. In some cases, no weekly rest day payments were noted in the payroll as required by the law.	Review payroll procedures and system to ensure that weekly rest days are properly paid for when workers complete 48 hours of work within Monday to Friday.		
Oct-16	Compensation	Paid Leave	Compensation for annual leaves is not accurately calculated.	The factory needs to review its payroll system and procedures to ensure that all annual leave payments are compliant with the legal requirements.		
Oct-16	Compensation	Paid Leave	Sick leave payments are based on the minimum wage instead of the average earnings as stipulated by Article 148 of the labor code.	The factory needs to review its payroll system and procedures to ensure that all sick leave payments are compliant with the legal requirements.		
Oct-16	Compensation	Paid Leave	Maternity leave payments are based on the minimum wage instead of the average earnings as stipulated by Article 148 of the labor code.	The factory needs to review its payroll system and procedures to ensure that all sick leave payments are compliant with the legal requirements.		
Oct-16	Compensation	Social Security and Other Benefits	ONA payment is late.	Ensure that ONA payments are paid on time every month.	The factory has started to monitor the timeliness of ONA payments. All dues have been fully paid until July 2017.	

Oct-16	Compensation	Social Security and Other Benefits	ONA contribution is collected but not forwarded on time to workers.	Ensure that ONA payments are paid on time every month.	The factory has started to monitor the timeliness of ONA payments. All dues have been fully paid until July 2017.	
Oct-16	Compensation	Social Security and Other Benefits	The factory has not registered with OFATMA for work-related accident insurance.	Register with OFATMA for work-related accident insurance.	CODEVI is registered with OFATMA for work-related accident insurance. The company completed the payment for 2016-2017 fiscal year.	
Oct-16	Compensation	Social Security and Other Benefits	The factory has not registered with OFATMA for maternity and health insurance (employer's contribution).			
Oct-16	Compensation	Social Security and Other Benefits	The factory has not registered with OFATMA for maternity and health insurance (workers' contribution).			
Oct-16	Compensation	Social Security and Other Benefits	Compensation for annuals leaves is not accurately calculated as the average earnings of the workers.	The factory needs to review its payroll system and procedures to ensure that all annual leave payments are compliant with the legal requirements.		
Oct-16	Compensation	Employment Contracts	Approved internal work rules were not posted at the workplace.	Obtain MAST's approval for the internal work rules.	The factory revised its internal work rules and sent them to MAST for approval. The factory posted the current version of the internal work rules in all buildings	
Oct-16	Compensation	Contracting Procedures	Workers categorized as apprentices were subjected to excessive overtime hours.	Ensure that overtime hours have prior authorization and are properly recorded and paid for all categories of workers. Obtain approval from MAST for the apprenticeship program and acquire other necessary related documents		
Oct-16	Compensation	Termination	Workers are often terminated without reason. In the terminated files, instead of stating the specific reason for termination, it only mentioned an article number.	Provide labor law training to the HR and management teams. Ensure that termination procedures are compliant with legal requirements.	Labor law training was provided to HR and management staff. Internal work rules were revised to ensure that the termination process is compliant with legal requirements.	

Oct-16	Compensation	Dialogue, Discipline and Disputes	Some supervisors do not treat workers with respect and no adequate grievance mechanism is available to follow up with workers' complaints.	Provide training to supervisors on proper workplace conduct. Communicate the company policy on verbal abuse to all employees.	Additional training has been provided to supervisors and further sessions have been scheduled for managers. Internal work rules were revised to ensure that the company policy on verbal abuse is properly communicated.	
Oct-16	Compensation	OSH Management Systems	The factory record work-related accidents but these records were not submitted to OFATMA.	Submit records of work-related accidents to OFATMA.		
Oct-16	Occupational Safety and Health	Chemicals and Hazardous Substances	No inventory of chemical substances used in the workplace were provided.	Ensure that a complete inventory of all chemicals used in the workplace is kept and updated by the compliance department.	An inventory of all chemicals used in the workplace is available at the compliance department.	
Oct-16	Occupational Safety and Health	Chemicals and Hazardous Substances	Several unlabeled chemicals containers found in the workplace.	Review the chemical handling procedures to ensure that labels are available at all times. Regularly monitor the implementation of this procedure.	Maintenance managers have been assigned to monitor chemical labeling at all times. Training was also provided to other staff members using chemicals on a regular basis.	
Oct-16	Occupational Safety and Health	Chemicals and Hazardous Substances	No MSDS available for several chemicals used in the workplace.	Review the chemicals handling procedure to ensure that labels and MSDS' are available at all times and regularly monitor its implementation.		
Oct-16	Occupational Safety and Health	Chemicals and Hazardous Substances	Workers did not receive any chemical safety-related training.	Provide training on chemicals safety and keep adequate records.	Training on chemical safety was provided and adequate records are available. Additional training sessions are also planned for the upcoming months.	
Oct-16	Occupational Safety and Health	Chemicals and Hazardous Substances	No eye wash stations were observed near the chemical usage areas of 5 buildings.	Install eye wash stations in the chemical usage areas.	Additional eye wash stations were installed in the chemical usage areas of buildings FW, MD and AM2.	
Oct-16	Occupational Safety and Health	Worker Protection	Not all workers in the following sections were provided with PPE : spot cleaning section, stamping, and production.	Provide adequate PPE to all worker, as required and train them on the importance of using PPE. Assign a person in charge of monitoring the availability of PPEs.	Additional PPEs were provided in the MD and AM2 buildings. Training on chemical handling was provided. Maintenance coordinators have been tasked with monitoring the availability of PPEs.	

Oct-16	Occupational Safety and Health	Worker Protection	Several workers were seated on chairs without back rests. Also several standing workers in one building were not provided with standing mats. Several pregnant workers in another building were performing tasks that required them to stand for extended periods and were not provided with chairs when requested.	Replace the chairs without back rests.	Management has purchased new chairs to replace the ones without back rests. New chairs are provided to workers as needed.	
Oct-16	Occupational Safety and Health	Worker Protection	During the factory tour, EAs noticed that several machines were missing finger guards and pulley guards.	Define staff in charge of maintaining machine guards for each factory. Ensure that all machines have proper guards.	Machine guards were replaced and the maintenance coordinators have been assigned to monitor this requirement.	
Oct-16	Occupational Safety and Health	Worker Protection	No warning signs were posted on several electrical boxes.	Ensure that Top Choice and Superior assigns a management staff to be in charge of monitoring compliance issues.		
Oct-16	Occupational Safety and Health	Working Environment	Workplace temperature exceed 30 C.	Improve the temperature levels in the noted areas.	The factory installed a cooling system in AM2 and Mazava. They also added more fans and heat extractors in FW1 and MD. They plan to add cooling systems in FW1 in October 2017 and in MD, in December 2017.	
Oct-16	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets.	Build additional toilets.		
Oct-16	Occupational Safety and Health	Welfare Facilities	Lack of soap in the restrooms.	Assign a person in charge of monitoring the availability of soap in all toilets.		
Oct-16	Occupational Safety and Health	Welfare Facilities	The number of seats available at the existing eating area is inadequate to accommodate the total number of workers currently employed by the factory	Provide an eating area that can adequately accommodate all workers.		
Oct-16	Occupational Safety and Health	Health Services and First Aid	No systematic medical checks were arranged for newly hired workers within the first three months of employment.	Conduct regular medical checks for newly hired workers.	The factory conducts regular medical checks for newly hired workers on an ongoing basis.	
Oct-16	Occupational Safety and Health	Premium Pay	No adequate compensation is provided for work performed on both Saturday and Sunday.	Properly compensate workers for hours worked at night.		

Oct-16	Occupational Safety and Health	Health Services and First Aid	No systematic annual medical checks were arranged for workers.	Provide systematic annual medical checks for all workers.		
Oct-16	Occupational Safety and Health	Health Services and First Aid	No systematic bi-annual medical checks were arranged for workers who are exposed to work related hazards.	Provide systematic bi-annual medical checks were arranged for workers who are exposed to work related hazards.		
Oct-16	Occupational Safety and Health	Health Services and First Aid	Several pregnant workers complained that they were not provided with seats when requested.	Ensure that all pregnant women are provided with proper seats.	Additional chairs were provided for pregnant women.	
Oct-16	Occupational Safety and Health	Health Services and First Aid	Insufficient number of medical staff	Hire additional medical staff.		
Oct-16	Occupational Safety and Health	Health Services and First Aid	First aid boxes not easily accessible in 3 buildings.	Ensure that adequate first aid boxes are available in each building.		
Oct-16	Occupational Safety and Health	Emergency Preparedness	Two factories did not have an alarm system installed and the alarm system from another building was not operational.	Install proper fire detection and alarm system in all buildings.	The factory recruited one additional compliance officer to improve monitoring of the new plants.	
Oct-16	Occupational Safety and Health	Emergency Preparedness	Several undercharged or blocked fire extinguishers found in the workplace.	Increase the number of fire extinguishers inspection in all building. Keep a stock of additional fire extinguishers to be used in case of emergency.	The factory recruited one additional compliance officer to improve monitoring of the new plants.	
Oct-16	Occupational Safety and Health	Emergency Preparedness	The evacuation plans do not reflect the actual layout of the workplace for 2 building. No evacuation were posted in the workplace for 1 building.	Update all evacuation plan as required.		
Oct-16	Occupational Safety and Health	Emergency Preparedness	No records of fire drills were available for 3 buildings.	Conduct biannual emergency drills for each building.	The factory conducted emergency drills in all the buildings.	
Oct-16	Occupational Safety and Health	Emergency Preparedness	Cell phones were being charged inappropriately throughout the workplace and near highly flammable substances.	Provided workers with a designated charging stations.	Management provided workers with charging stations in order to address this issue.	
Oct-16	Working Time	Regular Hours	Workers from several buildings complained that they usually worked beyond regular hours but receive a fixed salary from management regardless of the actual hours worked.	Review compensation system for all eligible workers to ensure that they are properly paid for overtime hours.		

Oct-16	Working Time	Regular Hours	Several categories of workers were not punching in and out of the factory to record their working time. Several of these workers explained that they are subjected to long working hours but are not compensated accordingly.	Review attendance recording system for all eligible workers to ensure that all overtime hours are properly recorded for them.		
Oct-16	Working Time	Overtime	No authorization to work at night was provided to EAs during the assessment.	Request authorization to work at night from MAST.	New regulation on working hours eliminated that requirement.	
Oct-16	Working Time	Overtime	Several workers in the packing, shipping and loading session at 2 plants were found to have completed more than 80 hours overtime per trimester.	Respect legal limits for overtime.	New regulation on working hours eliminated that requirement.	
Oct-16	Working Time	Overtime	No authorization to work on Sundays was provided to EAs during the assessment.	Request authorization to work on Sundays from MAST.	New regulation on working hours eliminated that requirement.	
Oct-16	Working Time	Overtime	No authorization to work overtime was provided to EAs during the assessment.	Request authorization to work overtime from MAST.	New regulation on working hours eliminated that requirement.	



Factory: Fairway Apparel S.A.
Location: Port-au-Prince
Number of workers: 452
Date of BW registration : Mar-16

Date of last two Better Work assessments: Aug-17 Jun-16

Advisory and Training Services

11-Sep-18	Factory tour to conduct a hazard hunt with the plant manager. Review of the Improvement Plan and discussions on the new issues identified by union members with the plant manager.
03-Aug-18	Review of the Improvement Plan and discussions on social dialogue with union members and the plant manager. Observation of fire drills performed by workers under the direction of management .
29-Jun-18	Industry Seminar on Chemical Management System
5-Jun-18	Industry Seminar on Supervisory Skills (SST)
1-Jun-18	Industry Seminar on Leadership Skills
24-May-18	Advisory visit to discuss recent work stoppage and the functioning of the bipartite committee with plant manager.
15-Mar-18	Advisory visit to follow up on the recommendations made in the strike dismissal report and review the status of the improvement Plan.
02-Feb-18	Advisory visit to discuss on the improvement plan and strike protocol with the HR compliance officer. Factory tour to identify potential new OSH issues and validate corrections of current findings. Meeting on PICC functioning with HR and Compliance officer
08-Dec-17	Human Resources Management Training
24-Nov-17	Industrial Relations Training
15-Nov-17	Training on chemicals management.

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMIEDIATION EFFORTS	MONTHS
Assessment August 2017						
Aug-17	Occupational Safety and Health	Emergency Preparedness	The evacuation routes in the fabric warehouse were obstructed	Keep the evacuation routes in the fabric warehouse unobstructed during working hours, including overtime.	The evacuation routes in fabric warehouse remained unobstructed during subsequent advisory visits.	30
Aug-17	Compensation	Social Security and Other Benefits	Late ONA payment. Contribution is based on the minimum wage instead of the base salary.	Ensure that ONA payments are based on the basic salary instead of worker's minimum wages. Also, ONA payments must be made within 10 working days of the following month.	Remediation in progress. Last payment for August was paid on time on Sept 6 -Basic salary calculations include all revenues but subsidy given to workers for transportation. Management is having on going discussions to add subsidy to basic salary.	77
Aug-17	Compensation	Social Security and Other Benefits	Collecting and forwarding workers' contributions for social insurance funds to ONA.	Ensure that ONA payments are based on the basic salary instead of workers' minimum wages.	Remediation in progress. Basic salary calculations include all revenues but subsidy given to workers for transportation. Management is having ongoing discussion with workers to add subsidy to basic salary.	77

Aug-17	Compensation	Social Security and Other Benefits	Employer contribution to OFATMA for work-related accident insurance.	Ensure that the employer contribution to OFATMA for work-related accident insurance is 3 percent of workers' basic salary.		14
Aug-17	Compensation	Social Security and Other Benefits	Employer contribution to OFATMA for maternity and health insurance.	Register with OFATMA for maternity and health insurance services.		14
Aug-17	Compensation	Social Security and Other Benefits	Workers' contributions to OFATMA for maternity and health insurance.	Collect and forward of worker's contributions to OFATMA for maternity and health insurance.		14
Aug-17	Contract and Human Resources	Contracting Procedures	Excessive overtime for non production workers.	Ensure that non production workers do not exceed the legal limits for overtime hours.	Management hired extra labor to limit the overtime to acceptable levels.	14
Aug-17	Occupational Safety and Health	OSH Management Systems	Assessment of general occupational safety and health issues in the factory.	Set up an OSH committee and conduct a monthly assessment of general occupational health and safety in the factory.	OSH committee has been reactivated and conducts regular monthly OSH assessments	14
Aug-17	Occupational Safety and Health	OSH Management Systems	Mechanisms to ensure cooperation between workers and management on OSH matters.	Ensure that the factory has an active OSH committee that meets at least once a month.	OSH committee has been reactivated and conducts regular monthly meetings	14
Aug-17	Occupational Safety and Health	OSH Management Systems	Written OSH policy signed by top management.	Update OSH policy in consultation with workers' representatives. Ensure that the policy is signed by top management.	OSH policy was discussed with OSH committee and is signed by top management	14
Aug-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Inventory of chemicals and hazardous substances used in the workplace does not include the amount of chemicals in storage.	Update the list of chemicals used and include the products in storage in the inventory of chemicals and hazardous substances.	Management has started to make its production free of chemicals and is updating inventory as it eliminates the usage of such products.	14
Aug-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Assessing, monitoring, preventing and/or limiting workers' exposure to hazardous substances.	Measure worker's exposure to hazardous substances.	. Management has started to make its production free of chemicals and hazardous substances.	14
Aug-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Washing facilities or cleansing materials are not available in the event of chemical exposure.	Provide adequate washing facilities and cleansing materials in the event of exposure to hazardous chemicals.	Adequate eye wash station has been installed for personnel working in spot cleaning section.	14
Aug-17	Occupational Safety and Health	Worker Protection	Personal protective clothing and equipment not available for workers in the spot cleaning.	Replace damaged PPE and provide adequate equipment to workers using hazardous chemicals.		14
Aug-17	Occupational Safety and Health	Worker Protection	Workers are not using personal protective equipment installed on machines.	Train and encourage workers to properly use personal protective equipment and machines.	Training completed by top management on September 15th	52

Aug-17	Occupational Safety and Health	Worker Protection	Missing guards on some dangerous parts of machines and equipment.	Install proper guards and maintain all dangerous parts of machines and equipment.	Remediation in Management is proactively collaborating with workers, supervisors and mechanics to repair and maintain machine guards in a timely manner.	14
Aug-17	Occupational Safety and Health	Working Environment	Workplace temperature exceed BW recommended limit of 30 C.	Improve the temperature levels throughout the workplace.		72
Aug-17	Occupational Safety and Health	Welfare Facilities	The last drinking water test provided by the factory indicated that the water contained harmful germs.	Provide workers enough free safe drinking water.	The most recent water test completed revealed no harmful germs in the water.	14
Aug-17	Occupational Safety and Health	Health Services and First Aid	No medical check for workers within the first three months of hiring.	Provide medical checks for all workers within the first three months of hiring.	The factory implemented a system to ensure that medical checks are provided for all new workers.	14
Aug-17	Occupational Safety and Health	Health Services and First Aid	lack of Health checks for workers who are exposed to work-related hazards.	Provide bi-annual medical checks to workers who have been exposed to work related hazard	The factory is implementing a system to provide bi-annual checks to workers who have been exposed to work related hazard	14
Aug-17	Occupational Safety and Health	Health Services and First Aid	Annual medical checks for workers.	Provide annual medical checks to all workers.	The factory implemented a system to ensure that medical checks are provided for all new workers.	14
Aug-17	Occupational Safety and Health	Health Services and First Aid	Access to one first aid box was completely obstructed by fabric cartons.	Ensure first aid boxes are accessible and remain unobstructed.	First aid boxes are unobstructed.	14
Assessment June 2016						
Jun-16	Compensation	Overtime Wages	Security guards' overtime payment is inaccurate.	Adjust the security guards' salary according to their working hours.	The factory adjusted the security guards' salary according to their working hours.	
Jun-16	Compensation	Overtime Wages	Security guards were not paid correctly for regular overtime hours.	Ensure that the security guards are paid properly.	The factory changed the security guards employment contracts.	
Jun-16	Compensation	Overtime Wages	Security guards were incorrectly paid for overtime hours worked at night as they received a fixed salary.	Ensure that the security guards' pay is compliant with the law.	Security cameras have been installed and the guards no longer work at night.	
Jun-16	Compensation	Overtime Wages	Security guards were not paid for overtime hours worked during legally mandated holidays as they received fixed salaries.	Ensure that the security guards' payments are compliant with legal requirements.	The security guards' payments are compliant with legal requirements.	
Jun-16	Compensation	Overtime Wages	Security guards were not paid for overtime hours worked during weekly rest days as they received fixed salaries.	Ensure that the security guards' payments are compliant with legal requirements.	The security guards' payments are compliant with legal requirements.	

Jun-16	Compensation	Premium Pay	Security guards were incorrectly paid for regular hours worked at night as there was no 50 percent increase for such payments	Ensure that the security guards' payments are compliant with legal requirements.	The security guards' payments are compliant with legal requirements.	
Jun-16	Compensation	Premium Pay	Security guards were incorrectly paid for regular hours worked during weekly rest days.	Ensure that the security guards' payments are compliant with legal requirements.	The security guards' payments are compliant with legal requirements.	
Jun-16	Compensation	Premium Pay	Security guards were incorrectly paid for regular hours worked during holidays.	Ensure that the security guards' payments are compliant with legal requirements.	The security guards' payments are compliant with legal requirements.	
Jun-16	Compensation	Wage Information, Use and Deduction	Payroll records for the last 3 months showed some discrepancies.	Ensure that the attendance system is linked to the payroll system.	The attendance system is linked to the payroll system.	
Jun-16	Compensation	Social Security and Other Benefits	The employer's payment to ONA was late.	Ensure timely payments to ONA on a monthly basis.		
Jun-16	Compensation	Social Security and Other Benefits	The employer does not collect and forward the workers' contributions to ONA on time for social insurance services.	Ensure timely payments to ONA on a monthly basis.		
Jun-16	Contract and Human Resources	Termination	The notice period payment for terminated workers is incorrectly calculated.	Management should compensate workers based on the average earnings for the last 3 months of work.	Payment for notice of termination is based on average earnings.	
Jun-16	Contract and Human Resources	Termination	The unused annual leave payments for terminated workers is incorrectly calculated.	Management should compensate workers based on the average earnings for the last 3 months of work.	Annual leave payments are based on average earnings.	
Jun-16	Contract and Human Resources	Termination	Calculation of the annual salary supplement or bonus is inaccurate.	Calculate the bonus payments based on the actual days worked during the employment year.	Calculation of the annual salary supplement or bonus is accurate.	
Jun-16	Occupational Safety and Health	Chemicals and Hazardous Substances	No MSDS and eye wash station available for chemicals and hazardous substances.	MSDS for thinner and an eye wash station should be provided in the mechanic shop.	The gallons of thinner has been removed	
Jun-16	Occupational Safety and Health	Chemicals and Hazardous Substances	EAs observed 2 gallons of thinner in the mechanic shop. However, no MSDS was available.	MSDS for thinner and an eye wash station should be provided in the mechanic shop.	The gallons were removed from the mechanic shop.	
Jun-16	Occupational Safety and Health	Worker Protection	No appropriate PPE was provided to workers using thinner.	Provide appropriate PPE to all workers.		
Jun-16	Occupational Safety and Health	Worker Protection	Several workers were not using the PPEs provided by management.	Provide training to workers on the importance of using PPE.		
Jun-16	Occupational Safety and Health	Working Environment	The temperatures exceeded the BW recommended limit of 30 C.	Ensure that the workplace temperatures do not exceed 30C.	A protective layer has been added under the metal sheets.	

Jun-16	Occupational Safety and Health	Working Environment	Lighting levels do not meet Better Work recommendations.	Ensure that the light levels are compliant with the recommendations.	New lights have been installed to comply with the suggested requirements for each sections.	
Jun-16	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets	Ensure that the factory has at least 28 functioning toilets for women.	17 toilets for women have been added.	
Jun-16	Occupational Safety and Health	Welfare Facilities	The eating area can only accommodate a small percentage of the workforce.	Ensure that the eating area can accommodate all workers.	The factory is expanding the eating area to comply with this requirement.	
Jun-16	Occupational Safety and Health	Emergency Preparedness	Several obstructed aisles were noted in the fabric warehouse.	Ensure that the aisles in the fabric warehouse remain unobstructed during working hours, including overtime.		
Jun-16	Working Time	Regular Hours	The time records do not reflect the actual hours worked.	Keep accurate working time records.		
Jun-16	Working Time	Leave	The factory does not always authorize sick leave when the workers submit proper medical certificate.	Provide leave as requested in the medical certificate.		
Jun-16	Working Time	Leave	Nursing mothers are not informed of their eligibility for breastfeeding break.	Allow nursing workers to take breastfeeding breaks.	All workers are able to take breastfeeding breaks.	
Jun-16	Occupational Safety and Health	Chemicals and Hazardous Substances	No eye wash stations were available on the event of exposure of chemicals hazardous materials.	Install eye wash station on the event of exposure of chemicals hazardous material.		



Factory: Go Haiti
Location: Port-au-Prince
Number of workers: 258
Date of BW registration:
Date of last two Better Work assessments: Nov-16 Oct-17

Advisory and Training Services

28-Aug-18 Advisory visit to review improvement action: employment contract and employer contribution to OFATMA for maternity and health insurance. Factory tour to review and validate OSH issues. Quick assessment of social dialogue, grievance handling mechanism, and learning plan.

04-Jun-18 Advisory visit to investigate allegations of discrimination in the hiring process.

5-May-18 Bipartite Committee (PICC) training

24-Apr-18 Advisory visit to review the improvement action related to compensation such as payroll for social security, weekly rest days and mandatory holiday. Factory tour to verify OSH remediation effort. Union's interview.

20-Feb-18 Advisory visit to establish a training plan and follow up on the bipartite committee election.

16-Jan-18 Advisory visit to help management prepare the first progress report, review the last assessment findings. Factory tour to verify the status of OSH issues.

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDATION EFFORTS	MONTHS
Assessment April 2017						
Oct-17	Occupational Safety and Health	Working Environment	Workplace temperature exceed 30 C in the following areas: Packing section, Quality section, Sewing section, pressing section	Improve the temperature levels in the noted areas.		22
Oct-17	Occupational Safety and Health	Working Environment	Insufficient light levels.	Ensure the lighting is adequate and adapted to worker's needs.	The factory has purchased personal sewing lamps.	11
Oct-17	Occupational Safety and Health	Welfare Facilities	The factory has 6 functional toilets for 77 men and 10 functional toilets for 187 Women.	Ensure that the factory has 12 functioning toilets for women.		22
Oct-17	Occupational Safety and Health	Health Services and First Aid	The factory has 1 nurse and 5 doctor's visits per week.	Ensure that the factory has a permanent onsite medical staff, with at least 2 nurses and 3 doctor's visits per week.	The factory hired one additional nurse.	22
Oct-17	Occupational Safety and Health	Health Services and First Aid	First-aid training for workers.	Provide first-aid training for at least 10 percent of the total workforce.	First-Aid training was provided to workers.	11

Oct-17	Occupational Safety and Health	Emergency Preparedness	Training workers to use the firefighting equipment.	Provide training to at least 10 percent of the total workforce in the use of fire-fighting equipment.	Fire-fighting training was provided to workers.	11
Oct-17	Occupational Safety and Health	Emergency Preparedness	Periodic emergency drill	Ensure that workers participate to an emergency drill every six months.	The last fire drill was done in March 2018.	11
Oct-17	Occupational Safety and Health	Emergency Preparedness	Direct wire connection to electrical outlets in the storage room next to the gas tank.	Ensure that possible sources of ignition appropriately safeguarded.	The connection to the electrical outlet has been removed.	11
Oct-17	Compensation	Method of Payment	Wages payment not regularly paid on time.	Ensure regular and timely payment of wages every 15 days.	Wages payment are done every two weeks.	11
Oct-17	Compensation	Social Security and Other Benefits	Employer contribution to ONA is based on minimum wage.	Ensure that ONA payment is based on the basic salary instead of worker's minimum wages. Then, made the monthly payment within the first 10 working days of the following month.	Change has been done in the system and employer contribution to ONA is based on workers' basic salary.	11
Oct-17	Compensation	Social Security and Other Benefits	Workers' contributions to ONA is base on the minimum wage.	Ensure that ONA payment is based on the basic salary instead of worker's minimum wages.	Change has been done in the system and worker's contributions to ONA is based on workers' basic salary.	11
Oct-17	Occupational Safety and Health	Worker Protection	Workers are not using the eye guards on their sewing machines.	Provide training to all workers and encourage them to use PPE, machines and equipment safely.	Training have been provided to the operators.	11
Oct-17	Occupational Safety and Health	Worker Protection	Single needle machines missing finger guards. Also the grinder in the mechanical room is missing a safety cover.	Install guards on all dangerous parts of machines and equipment.	Safety cover has been placed on the grinder.	11
Assessment November 2016						
Nov-16	Compensation	Social Security and Other Benefits	The factory did not register with OFATMA for maternity and health insurance (employer's contribution).	Register for the mandatory health and maternity insurance services from OFATMA.		
Nov-16	Occupational Safety and Health	Working Environment	The temperatures at the sewing and quality sections exceeded the BW recommended limit of 30 C.	Ensure that workplace temperatures are compliant in all sections.		

Nov-16	Occupational Safety and Health	Welfare Facilities	The factory has 9 toilets for men and 11 toilets for women. With its current workforce, the factory should have 15 for women.	Provide enough toilets in proportion to the number of workers in the factory, as required by the law. Keep existing toilets clean and properly maintained	The factory is planning to add mobile toilets to comply with this requirement.	
Nov-16	Occupational Safety and Health	Health Services and First Aid	The factory has only 1 on site nurse and 1 doctor.	To comply with the Haitian labor code, the factory should hire an additional nurse as a part of their on site medical team.		
Nov-16	Compensation	Social Security and Other Benefits	The factory did not register with OFATMA for maternity and health insurance (workers' contribution).	Register for the mandatory health and maternity insurance services from OFATMA.		



Factory: H&H Textiles S.A.
Location: Port-au-Prince
Number of workers: 2805
Date of BW registration: Jan-14
Date of last two Better Work assessments: Dec-16 Nov-17

Advisory and Training Activities

20-Aug-18 Industry Seminar on Supervisory Skills (SST)
 18-Jul-18 Industry Seminar on Grievance Mechanism
 05-Jul-18 Meeting with management to validate pending issues for PR2.
 29-Jun-18 Industry Seminar on Chemical Management System
 17-May-18 Review of improvements with compliance manager.
 PICC meetings to discuss workplace issues such as disciplinary measures, OFATMA and workplace communication
 13-Apr-18 Meeting with management to update improvement plan with remediation efforts. Factory tour to verify OSH remediation efforts.
 PICC meeting to establish a workplan in order to improve workplace communication and address non compliance issues.
 13-Apr-18 Meeting with management to update improvement plan with remediation efforts.
 Factory tour to verify OSH remediation efforts.

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDIATION EFFORTS	MONTHS
Assessment November 2017						
Nov-17	Freedom of Association and Collective Bargaining	Interference and Discrimination	The factory terminated 8 union leaders for absence during a sectorial strike.	Reinstate terminated union leaders.	The factory paid the full payment of the notice period to terminated union leaders as agreed with the union federation to close teh case..	15
Nov-17	Contract and Human Resources	Dialogue, Discipline and Disputes	Incidents of verbal abuse from supervisors reported by workers and observed during the assessment visit.	Train supervisors and managers on the anti-harassment and abuse policy.	The factory trained managers and supervisors on the anti-harassment and abuse policy.	15
Nov-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Unlabeled chemicals in use on the floor.	Elaborate a chemicals management policy. Assign staff in charge of monitoring compliance with labeling requirements. Conduct regular checks. The factory hired two additional compliance officer. The compliance team conducts daily checks on the floors.	The factory hired two additional compliance officers. The compliance team conducts daily checks on the floors.	40

Nov-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Inadequate storage of chemicals and hazardous substances.	Elaborate a chemicals management policy. Assign staff in charge of monitoring the chemicals storage.	The factory hired two additional compliance officer. The compliance team conducts daily checks on the floors.	15
Nov-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Chemical safety data sheets were missing for some chemicals and hazardous substances in the workplace.	Elaborate a chemicals management policy. Assign staff in charge of monitoring compliance with MSDS requirements. Post the missing MSDS. Conduct regular checks.	The factory hired two additional compliance officers. The compliance team conducts daily checks on the floors.	26
Nov-17	Occupational Safety and Health	Chemicals and Hazardous Substances	No washing facilities or cleansing materials in the event of chemical exposure in some areas where chemicals are used.	Elaborate a chemicals management policy. Assign staff in charge of monitoring compliance with labeling requirements. Install the missing eye wash stations. Conduct regular checks.	The factory hired two additional compliance officer. The compliance team conducts daily checks on the floors.	46
Nov-17	Occupational Safety and Health	Worker Protection	30 percent of the single needle machines in one building did not have finger guards.	Improve the machine maintenance procedures. Assign staff in charge of monitoring availability of machine guards. Install the missing machine guards. Conduct regular checks.	Missing machine guards were installed. The factory hired two additional compliance officers. The compliance team conducts daily checks on the floors to monitor the availability of machine guards.	15
Nov-17	Occupational Safety and Health	Worker Protection	7 electrical boxes in the workplace did not have any safety warning signs.	Ensure that all electrical installations are properly marked.	The factory marked all electrical installations. The factory hired two additional compliance officers. The compliance team conducts daily checks on the floors to monitor the availability of warning signs.	15
Nov-17	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets.	Increase the number of toilets. Maintain the existing ones.	The factory has a maintenance plan for the existing toilets.	46
Nov-17	Occupational Safety and Health	Welfare Facilities	During the factory tour, EAs observed that no soap was provided in the factory toilets.	Ensure that soap is available in toilets during working hours.	The factory provided soap. The compliance team conducts daily checks on the floors to monitor the availability of soap during working hours.	46

Nov-17	Occupational Safety and Health	Welfare Facilities	Insufficient eating area.	Increase the number of seats in the eating areas.	The factory built a new eating area to accommodate all workers.	34
Nov-17	Occupational Safety and Health	Health Services and First Aid	The factory did not provide health checks to workers who have been exposed to work-related hazards.	Provide health checks to workers who have been exposed to work-related hazards.	The factory provided the first health checks to workers who have been exposed to work-related hazards. A second health check will be offered by the end of the year.	15
Nov-17	Occupational Safety and Health	Health Services and First Aid	The factory did not provide annual medical checks for workers.	Provide annual health checks to all workers.	The factory hired two additional doctors to provide annual health checks to all workers.	15
Nov-17	Occupational Safety and Health	Health Services and First Aid	Insufficient medical staff.	Hire additional medical staff as required by law.	The factory hired two additional doctors to provide annual health checks to all workers.	46
Nov-17	Occupational Safety and Health	Health Services and First Aid	First aid boxes not properly maintained.	Ensure that first aid boxes are properly supplied and easily accessible during working hours.	The nurses refilled all first aid boxes as required. The compliance officers monitor the availability of first aid supplies on a daily basis.	15
Nov-17	Occupational Safety and Health	Emergency Preparedness	Fire alarm systems in one building was not operational.	Install fire alarm in module 4.	The factory installed a fire alarm in module 4.	15
Nov-17	Occupational Safety and Health	Emergency Preparedness	Firefighting equipment not properly maintained.	Ensure that all fire extinguishers are properly maintained and easily accessible.	The factory hired two additional compliance officer. The compliance team conducts daily checks on the floors to verify the fire extinguishers.	40
Nov-17	Occupational Safety and Health	Emergency Preparedness	inadequate marking or posting of emergency exits and/or escape routes in the workplace.	Ensure that evacuation plans are updated, available and displayed in all buildings.	Evacuation plans was updated and displayed in module 4.	15
Nov-17	Occupational Safety and Health	Emergency Preparedness	One building only had one emergency exit for the entire building.	Add another exit door for Module 4	The factory added another exit for module 4	15

Nov-17	Occupational Safety and Health	Emergency Preparedness	Some emergency exits were not easily accessible, unobstructed, and/or unlocked during working hours, including overtime.	Ensure that all exits are easily accessible during working hours.	The factory added another exit for module 4	15
Nov-17	Occupational Safety and Health	Emergency Preparedness	Fire drills were not conducted every 6 months in all buildings.	Conduct fire drill in all buildings every 6 months.	Fire drills have been conducted on all buildings in April and May 2018. A second round of drills will be conducted before the end of the year.	15
Nov-17	Working Time	Regular Hours	Working time records reliability was not confirmed.	Ensure that reasons for manual input of hours are properly recorded.	The factory has changed the energy backup system to prevent further disruption. Additionally, HR staff will mark with a dedicated note on the system for all instances of manual input of work hours. The manual input procedures are used only in the event of workers not marking the hours themselves when they have lost or forgot the punching badge. Monthly audits of HR systems will be conducted to ensure that the procedures are followed through.	15
Assessment December 2016						
Dec-16	Freedom of Association and Collective Bargaining	Collective Bargaining	The CBA is not fully implemented.	Communicate the CBA to all management staff. Ensure that lunch is provided after 5 hours of work on Sundays.	The current CBA expired. The factory is renegotiating the CBA.	
Dec-16	Compensation	Paid Leave	Nursing women were not properly compensated for the breastfeeding break.	Review the breastfeeding policy. Ensure that all eligible women take advantage of the one hour breastfeeding break as required by law.	All women entitled to the benefit have actually benefited from the policy. A change in the rules now allows them to take 1 hour of paid breastfeeding time.	
Dec-16	Compensation	Social Security and Other Benefits	Inaccurate and late ONA payment.	Review ONA payment procedures to ensure that the payments are accurate.	The ONA payment was revised to ensure that the amount paid by the employer is equivalent to the amount collected from workers.	

Dec-16	Compensation	Social Security and Other Benefits	Late submittal of workers contribution to ONA.	Review ONA payment procedures to ensure that the payments are accurate.	ONA payments are done on time, the total amount collected from workers matched the total amount paid by the employers. The total amount is transferred to ONA.	
Dec-16	Compensation	Social Security and Other Benefits	The employer did not pay for work-related accident insurance for the 2016-2017 fiscal year.	Review the OFATMA payment procedures to ensure that the payments are done on time.	OFATMA accident insurance has been paid for the year 2016/2017.	
Dec-16	Compensation	Social Security and Other Benefits	The employer is not affiliated with OFATMA for maternity and health insurance services (workers' contributions).	Register with OFATMA for maternity and health insurance services.	The factory is registered with OFATMA as of September 2017 and the invoice fully paid. The factory communicated the information to workers.	
Dec-16	Compensation	Social Security and Other Benefits	The employer does not collect and forward workers contribution OFATMA maternity and health insurance (workers' contribution).	Register with OFATMA for maternity and health insurance services and collect and forward workers contribution OFATMA maternity and health insurance.	The factory is registered with OFATMA as of September 2017 and the invoice fully paid. The factory communicated the information to workers.	
Dec-16	Occupational Safety and Health	Chemicals and Hazardous Substances	Two gallons of unlabeled chemicals were observed in the mechanic shop at Module 1.	Review the chemicals handling procedures. Communicate new procedures to all staff using chemicals and monitor its implementation.	All chemicals containers used in spot cleaning areas have been properly identified. All personnel handling chemicals have been instructed to only use properly identified and assigned containers for the use of chemicals. Daily checks are conducted to ensure that all procedures are in place and enforced.	
Dec-16	Occupational Safety and Health	Chemicals and Hazardous Substances	No MSDS available for all chemicals used in the workplace.	Review the chemicals handling procedures. Communicate new procedures to all staff using chemicals and regularly monitor the availability of MSDS.	The MSDS were translated in creole to facilitate better understanding of the products in use and improve workers' behavior in handling chemicals. The original English version has also been posted.	

Dec-16	Occupational Safety and Health	Working Environment	The temperature level in the Building 3 sewing section exceeded the BW recommended limit of 30 C.	Reduce the temperature in the sewing area.		
Dec-16	Occupational Safety and Health	Working Environment	The noise levels throughout Building 3 exceeded the BW recommended maximum of 90 dB.	Reduce the level of noise in the workplace.		
Dec-16	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets.	Repair or replace the existing toilets.	New personnel has been hired to repair and maintain all toilets in the facility. The equipment is continuously maintained to improve usability and availability.	
Dec-16	Occupational Safety and Health	Welfare Facilities	No soap was provided in the workers' toilets.	Monitor the availability of soap on a regular basis.	Additional soap dispensers have been installed. Daily checks are conducted to ensure that dispensers are filled with soap at regular interval throughout the day.	
Dec-16	Occupational Safety and Health	Welfare Facilities	The number of seats in the eating area is inadequate.	Expand the eating area to accommodate all workers.	A new cafeteria is under construction. The new facility is expected to provide seating capacity to accommodate all workers.	
Dec-16	Occupational Safety and Health	Health Services and First Aid	The factory only has 2 nurses and 3 doctor's visits each week.	To comply with the Haitian Labor Code, a factory of this size must have a permanent on site medical service, with at least 13 nurses and 3 doctor's visits per week.	The factory participated in the factory clinic improvement program. The factory won the "Best Improvement award" for successful completion of their improvement plan.	
Dec-16	Occupational Safety and Health	Emergency Preparedness	Fire extinguishers were blocked by cardboard boxes in the fabric warehouse of Module 1 and mezzanine area 2.	Communicate the compliance requirements for fire extinguishers to all the staff working in the mezzanine area.	The monitoring of fire fighting equipment has been reinforced. The OSH committee is taking a more active role in helping keep all necessary equipment free of obstacle. Daily checks are conducted to ensure that the procedures are enforced.	

Dec-16	Working Time	Overtime	The employer does not have an authorization from the Ministry of Labor for working on Sundays.	Obtain an authorization from the Ministry of Labor for working on Sundays.	A correspondence has been sent to the MAST to request authorization for Sunday Work. However a new regulation eliminated this requirement.	
Dec-16	Working Time	Overtime	The employer does not have an authorization from the Ministry of Labor for working overtime.	Request an authorization from the Ministry of Labor for overtime work.	A correspondence has been sent to the MAST to request authorization for overtime work. However a new regulation eliminated this requirement.	



Factory: Haiti Premier Apparel
Location: Port-au-Prince
Number of workers: 1427
Date of BW registration: Aug-10
Date of last two Better Work assessments: Nov-16 Oct-17

Advisory and Training Services

07-Sep-18 Advisory service on social
 07-Sep-18 PICC meeting: The discussion was on the annual leave payment that is paid in September.
 29-Jun-18 Industry Seminar on Chemical Management System
 27-Jun-18 Advisory service on the Factory's Improvement plan and on the communication protocol in case of industrial dispute with the Human Resource Manager.
 27-Jun-18 PICC meeting : Introduction of the new HR manager and discussion was on the high rate of absenteeism and on the decrease of the workers' productivity.
 17-Apr-18 Advisory service on the Factory's Improvement plan and on the progress report.
 17-Apr-18 PICC meeting: The discussion was on the consequences of the change of name or change of customers on the workers' contracts.
 06-Apr-18 Industry Seminar on Compliance Assessment Tool

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDATION EFFORTS	MONTHS
Assessment April 2017						
Oct-17	Compensation	Paid Leave	Legally mandated holidays payment is based on the minimum wage of reference.	Ensure the payments for legally mandate holidays are paid correctly.		22
Oct-17	Compensation	Paid Leave	The payment for weekly rest days is based on the minimum wage of reference.	Pay weekly rest day accurately		22
Oct-17	Occupational Safety and Health	Social Security and Other Benefits	ONA contributions made were less than 6 percent of the workers' base salaries	Pay ONA' deductions accurately and on time		22
Oct-17	Occupational Safety and Health	Social Security and Other Benefits	ONA contributions made were less than 6 percent of the workers' base salaries.	Pay ONA' deductions accurately and on time		22
Oct-17	Occupational Safety and Health	Social Security and Other Benefits	The amount paid to OFATMA for work-related accident insurance is less than 3 percent of the workers' base salary.	Ensure that the payment to OFATMA for work-related accident insurance is accurate.		22

Oct-17	Occupational Safety and Health	Social Security and Other Benefits	The factory has not yet registered with OFATMA for maternity and health insurance.	Register with OFATMA for maternity and health insurance		22
Oct-17	Occupational Safety and Health	Social Security and Other Benefits	The factory has not yet registered with OFATMA for maternity and health insurance.	Register with OFATMA for maternity and health insurance		22
Oct-17	Occupational Safety and Health	OSH Management Systems	The OSH policy does not include establishing measurable objectives and improvement targets and is not developed through consultation with workers and their representatives	Ensure to have an adequate written OSH policy		11
Oct-17	Occupational Safety and Health	Chemicals and Hazardous Substances	In the spot cleaning area, the chemicals and hazardous substances labeling in not in local language.	Label all the chemicals and hazardous substances in local language.	The new compliance officer is in charge to translate the label in the local language and to ensure that all containers used in the workplace are properly labelled.	22
Oct-17	Occupational Safety and Health	Chemicals and Hazardous Substances	MSDS were missing for several chemicals in the spot cleaning area and in the chemical warehouse. Some MSDS' were not available in local language.	Provide MSDS' for all chemical substances used in the workplace in local language.	MSDS are available for all chemical substances used in the workplace. The new compliance officer is in charge to translate MSDS in the local language.	22
Oct-17	Occupational Safety and Health	Worker Protection	The factory has not provided goggles and impervious aprons for the chemical warehouse workers and the face masks provided were in poor condition.	Ensure to give appropriate protective equipment to workers.	The factory provided new masks to workers working in the chemical warehouse.	11
Oct-17	Occupational Safety and Health	Worker Protection	Workers in the embroidery area were not using the provided earplugs to protect themselves from the high level of noise in the section.	Provide earplugs to workers in the embroidery area		11
Oct-17	Occupational Safety and Health	Worker Protection	Shock absorbing mats were not provided to most workers in the inspection areas of the different modules	Provide absorbing mats or foot rest to standing workers	The factory has started to provide ergonomic mats to standing workers	22
Oct-17	Occupational Safety and Health	Worker Protection	70% of the sewing machines did not have belt and eye guards and another machine located in the cutting area did not have a pulley guard	Ensure that all machines have their appropriate guards	The maintenance team is accountable to replace the eye guards and the belt guard.	22

Oct-17	Occupational Safety and Health	Working Environment	Temperature levels as follows exceeded 30 C	Ensure that temperature is under 30 C		22
Oct-17	Occupational Safety and Health	Working Environment	Insufficient light levels	Ensure the workplace is adequately lit		22
Oct-17	Occupational Safety and Health	Welfare Facilities	Insufficient toilets	Comply with legal requirements regarding the number of the toilets		22
Oct-17	Occupational Safety and Health	Health Services and First Aid	No regular health checks provided to workers exposed to work-related hazards.	Arrange at least two medical checks for workers exposed to work-related hazards		22
Oct-17	Occupational Safety and Health	Health Services and First Aid	Annual medical checks have not been conducted for all eligible workers according to national law.	Arrange an annual medical check for every worker.		22
Oct-17	Occupational Safety and Health	Health Services and First Aid	Insufficient medical staff.	Comply the legal requirements regarding medical staff		22
Oct-17	Occupational Safety and Health	Health Services and First Aid	Less than 10% of the workforce have been trained in first-aid.	Train 10% of the workforce in first aid		22
Oct-17	Occupational Safety and Health	Emergency Preparedness	No fire detection system in the back warehouse	Ensure the workplace has adequate firefighting equipment. Install fire detection system in the back warehouse	The factory installed an a smoke detector in the warehouse.	22
Oct-17	Occupational Safety and Health	Emergency Preparedness	The power outlet in the spot cleaning was not safeguarded.	Safeguard any source of ignition. Cover the power outlets		11
Oct-17	Working Time	Overtime	No valid authorization from the Department of Labour before working overtime.	Ensure to obtain a valid authorization from the Department of Labour before working overtime		22
Assessment April 2016						
Nov-16	Compensation	Paid Leave	Sick leave payments are based on the minimum wage	Calculate sick leave based on average earnings.	The factory paid sick leave based on average earnings as stipulated by the law.	
Nov-16	Compensation	Paid Leave	The maternity leave payments are based on the minimum wage	Calculate maternity leaves based on average earnings.	Maternity is calculated on average earnings as stipulated by the law.	
Nov-16	Compensation	Social Security and Other Benefits	ONA contributions are less than 6 percent of workers' base salaries. Late payment of ONA.	Ensure that ONA payments are on time and accurate.		

Nov-16	Compensation	Social Security and Other Benefits	ONA contributions are less than 6 percent of workers' base salaries	Ensure that ONA payments are on time and accurate.		
Nov-16	Compensation	Social Security and Other Benefits	The amount paid by the employer to OFATMA is less than 3 percent of the workers' base salary.	Ensure that the payment to OFATMA for work-related accident insurance is accurate.		
Nov-16	Compensation	Social Security and Other Benefits	The factory has not yet registered with OFATMA for maternity and health insurance.	Register the factory for OFATMA's maternity and health insurance services.		
Nov-16	Compensation	Social Security and Other Benefits	The factory has not yet registered with OFATMA for maternity and health insurance.	Register the factory for OFATMA's maternity and health insurance services.		
Nov-16	Contract and Human Resources	Employment Contracts	The factory's internal work rules have not been approved by the Ministry of Labor (MAST). Management showed a copy of the request letter sent to MAST, yet approval is pending	Ensure that the factory's internal work rules are approved by the Ministry of Labor (MAST).	The factory's internal work rules document has been approved by the Ministry of Labor (MAST).	
Nov-16	Contract and Human Resources	Dialogue, Discipline and Disputes	Workers who do not complete 40-50 percent of daily production targets by midday are laid off for the rest of the day as a disciplinary measure.	Ensure that the factory's internal work rules are approved by the Ministry of Labor (MAST).	The factory's internal work rules are approved by MAST.	
Nov-16	Occupational Safety and Health	Chemicals and Hazardous Substances	Unlabeled containers of chemicals	Ensure that chemicals are properly labeled and stored.	The factory labeled all container in the boiler room, in the mechanic shop and in the spot cleaning	
Nov-16	Occupational Safety and Health	Chemicals and Hazardous Substances	Missing MSDS'	Provide chemical safety data sheets for all the hazardous chemicals used in the workplace.	The management has posted safety data sheets in the spot cleaning area.	
Nov-16	Occupational Safety and Health	Chemicals and Hazardous Substances	No proof of chemical handling safety training was provided during the assessment.	Keep records of chemical handling safety training sessions.		
Nov-16	Occupational Safety and Health	Worker Protection	Several standing workers in the inspection areas were not provided with anti-fatigue mats or foot rests.	Comply with ergonomic requirements at the workplace.	The management provided anti-fatigue mats to standing workers who needed it.	
Nov-16	Occupational Safety and Health	Worker Protection	More than 50 percent of all machines were missing pulley guards.	Install proper safety guards on the machines. Conduct regular maintenance.	The management did an inventory of missing guards. The order has been done and they are waiting for the delivery to install the missing parts.	

Nov-16	Occupational Safety and Health	Working Environment	The temperature exceeded the BW recommended limit of 30 C.	Ensure that the workplace temperature does not exceed 30 C.		
Nov-16	Occupational Safety and Health	Working Environment	The noise level exceeded the BW recommended limit of 90 dB.	Ensure that noise levels are maintained within the recommended limit.	Recent checks done on a regular basis revealed that the pressing section is under 90 dB.	
Nov-16	Occupational Safety and Health	Working Environment	Several sections around the workplace were inadequately lit.	Adequately light the workplace.		
Nov-16	Occupational Safety and Health	Welfare Facilities	Insufficient toilets	Provide an adequate number of toilets according to the size of the workforce.	The factory has 11 toilets for men.	
Nov-16	Occupational Safety and Health	Health Services and First Aid	No systematic medical checks were arranged for newly hired workers within the first three months of employment.	Ensure that newly hired workers received a medical check within the first three months of employment.	The factory recently hired a doctor who comes three times a week and provide health checks to workers.	
Nov-16	Occupational Safety and Health	Health Services and First Aid	No systematic medical checks were arranged for workers who have been exposed to work-related hazards.	Ensure that workers who have been exposed to work-related hazards receive regular medical checks.	The factory recently hired a doctor who come three times a week and provide health checks to workers.	
Nov-16	Occupational Safety and Health	Health Services and First Aid	No systematic annual medical checks were arranged for workers.	Conduct annual medical checks for all workers.	The factory recently hired a doctor who come three times a week and provide health checks to workers.	
Nov-16	Occupational Safety and Health	Health Services and First Aid	The factory has 2 full time nurses and 1 doctor's visit per week.	To comply with the Haitian labour code, a factory of this size must have a permanent on site medical service, with at least 7 nurses and 3 doctor's visits per week.	The factory has modified his contract with the doctor. The doctor's comes three days a week.	
Nov-16	Occupational Safety and Health	Health Services and First Aid	Only 38 workers were trained in first-aid.	To comply with the Haitian labour code, a factory of this size must have at least 144 workers trained in first-aid.		
Nov-16	Occupational Safety and Health	Emergency Preparedness	No smoke detectors were installed in the fabric warehouse on floor 2.	Install smoke detectors where needed.		

Nov-16	Occupational Safety and Health	Emergency Preparedness	2 fire extinguishers were found with low pressure. Several unidentified fire extinguishers	Provide an adequate number of functional and identifiable fire-fighting equipment.	All the extinguishers are functional and have been mounted on the walls with identification signs. During the last advisory visit, EAs also noted that the equipment was being checked on a monthly basis.	
Nov-16	Occupational Safety and Health	Emergency Preparedness	Only 38 workers were trained in fire-fighting procedures.	To comply with the Haitian Labor Code, a factory of this size must have at least 144 workers trained in fire safety.	The factory trained 24 workers in fire safety on January 2017.	
Nov-16	Occupational Safety and Health	Emergency Preparedness	Cellular phones were being charged with exposed wires in the mechanic shop and the stock trim warehouse.	Install a proper phone charging station.		
Nov-16	Working Time	Overtime	No authorization from the Department of Labour before working on Sundays.	Obtain a valid authorization from the Department of Labour before working on Sundays.		
Nov-16	Working Time	Overtime	No authorization from the Department of Labour before working overtime.	Obtain a valid authorization from the Department of Labour before working overtime.		



Factory: HANSAE HAITI S.A
Location: Port-au-Prince
Number of workers: 493
Date of registration: Jan-17
Date of last two Better Work Apr-18 Apr-17

Advisory Visits and Training Services.

23-Jul-18 Advisory visit to review the improvement and plan progress update with the Compliance officer. OSH tour.
 9-Apr-18 Advisory visit to review the improvement Plan with Compliance officer. Meteing with Union members to discuss industrial relations issues. OSH Tour.
 6-Apr-18 Advisory visit to review the assessment reportand the new improvement plan with the HR and quality Insurance manager. PICC Meeting. Meeting with consultant on the Productivity acceleration project.
 9-Mar-18 Advisory visit to discuss the grievance mechanisms. Interviews with workers on Grievance mechanism and criteria.
 19-Jan-18 Advisory visit to discuss on grievance mechanisms. Factory tour.
 19-Oct-17 Meeting with HR manager about break period for pregnant women, advised the factory on how to calculate the notice periode. Factory tour.

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDATION EFFORTS	MONTHS
Assessment April 2018						
Apr-18	Compensation	Paid Leave	The sick leave payment is based on minimum wage.	Change our payment system based on the average daily earnings.	The factory changed their payment system accordingly based on the average daily earnings.	6
Apr-18	Compensation	Termination	Notice payment is based on minimum wage. The law requires that notice payment should be calculated based on average daily earnings.	Change our payment system based on the average daily earnings.	The factory changed their payment system accordingly based on the average daily earnings.	6
Apr-18	Occupational Safety and Health	Chemicals and Hazardous Substances	No MSDSs were available in the mechanic room of building 21 for Acid sulfuric also in the spot cleaning of building 50 for FH 2000	Training should be provide to workers on chemical handling.	On the same day the MSDS was posted immediatly, for preventive action, a training on chemical handling have been provided to all maintenance and mechanics workers .	6
Apr-18	Occupational Safety and Health	Worker Protection	Inadequate electrical maintenance.	The company should cover the electrical panel , and give training to workers on electrical safety and fire safety.	Management has properly covered the panel and provided training to workers	6

Apr-18	Occupational Safety and Health	Health Services and First Aid	Expired products in first aid box #2 and #4 such as Betadine and triple antibiotic ointment.	Training should be provide to the nurses on medicine storage management.	Management already provided training on April 30th 2018 to the nurse and doctor regarding medicine storage management.	6
Apr-18	Occupational Safety and Health	Emergency Preparedness	The factory has sufficient firefighting equipment. However, one fire extinguisher near the training area, also another one near the sewing section of building 50 were undercharged. Management took immediate corrective actions during the assessment.	Monthly inspection of fire extinguishers.	Factory replaced BC type fire extinguishers to ABC types. The former had manufacturing malfunction which caused them to lose charge.	6
Assessment January 2017						
Jan-17	Compensation	Social Security and Other Benefits	The factory has not yet sent their contribution to OFATMA for maternity and health insurance.	Register with OFATMA for maternity and health insurance and ensure OFATMA payment are made on time.	The factory started to pay OFATMA in the month of April 2017. Also started to collect workers amount and forward it to OFATMA accordingly.	
Jan-17	Compensation	Social Security and Other Benefits	The factory do not collect and forward worker's contribution to OFATMA for maternity and health insurance.	The factory need to collect and forward workers contribution to OFATMA for maternity and health insurance.	The factory has started to collect and forward workers contribution to OFATMA for maternity and health insurance.	
Jan-17	Occupational Safety and Health	Worker Protection	Workers are not using PPE consistently.	Conduct training on the use of PPE in a monthly basis. - Monitor the usage of the PPE in a daily and consistent basis	Training has been done to workers on the use of PPE and actual inventory is updated.	
Jan-17	Occupational Safety and Health	Health Services and First Aid	The factory has one onsite nurse and there are no weekly doctor's visits. To comply with the Haitian Labour Code, a factory of this size must have 2 nurses and a doctor visit 3 times per week.	Hire additional medical staff.	The factory hire an additional nurse and a Doctor who works full time 3 times a week.	
Jan-17	Occupational Safety and Health	Health Services and First Aid	10 percent of the workforce are not trained in first aid.	Ensure that at least 10 percent of workers are trained in first aid.	First-Aid training was done by the compliance officers and the nurse, a total of 98 workers have been trained.	
Jan-17	Working Time	Overtime	No authorization has yet been obtained from the Ministry of Labor to perform overtime.	Request authorization to work overtime from MAST.	The factory received an authorization to perform overtime from MAST for the period of April to June 2018.	
Jan-17	Occupational Safety and Health	Emergency Preparedness	less than 10 percent of the workforce are not trained in fire fighting equipment.	Update the training plan and ensure that at least 10 percent of the workforce receive training in fire fighting equipment.	During the month of April Compliance officers trained 98 workers concerning firefighting equipment and the use of fire extinguishers.	

Jan-17	Occupational Safety and Health	Emergency Preparedness	Fire extinguisher with inadequate pressure.	Conduct internal inspection once a month and ensure inspection tags are updated.	External Inspection has been done to all fire extinguishers by Internegoce company and monthly internal inspection by the compliance officers.	
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Factory: Horizon Manufacturing S.A.
Location: Port-au-Prince
Number of workers: 671
Date of BW registration: Aug-10
Date of last two Better Work assessments: Jun-17 Apr-18

Advisory and Training Services

6-Sep-18 Meeting with management, the discussion was the factory financial issue and new production model.
 Meeting with trade union committee and management on the change of production system and Social Security.
 27-Apr-18 Meeting with management on the protocol of communication on industrial dispute with HR manager and the Compliance officer.
 Workshop with the OSH committee members on Hazard hunt.
 Bipartite meeting with management and trade unions on workforce reductions and
 6-Apr-18 Compliance Assessment Tool Industry Seminar
 24-May-18 Industry seminar Awareness on the theme of disability

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDATION EFFORTS	MONTHS
Assessment April 2018						
Apr-18	Compensation	Paid Leave	Non-working holidays are based on average hourly production wage which does not include overtime hours.	Include overtime wages in the calculation of paid leave.	The factory includes overtime in the calculation of the average earning.	23
Apr-18	Compensation	Paid Leave	Sick leave payments are based on average hourly production wage instead of average daily earnings.	Include the overtime wages in the calculation of sick leave.	The factory includes overtime in the calculation of the average earning.	11
Apr-18	Compensation	Paid Leave	Maternity leave payments are based on average hourly production wage instead of average daily earnings.	Include overtime wages in the calculation of maternity leave.	The factory includes overtime in the calculation of the average earning.	11
Apr-18	Compensation	Social Security and Other Benefits	Late ONA payment	Forward employer's contribution to ONA within the first 10 days of each month for the previous month.		23
Apr-18	Compensation	Social Security and Other Benefits	Late ONA payment	Collect and forward workers' contribution to ONA within the first 10 days of each month for the previous month.		23

Apr-18	Compensation	Social Security and Other Benefits	OFATMA payment for maternity and Health insurance is late by several months	Forward employer's contribution to OFATMA on monthly basis.		23
Apr-18	Compensation	Social Security and Other Benefits	OFATMA payment for maternity and Health insurance is late by several months	Collect and forward workers' contribution to OFATMA on a monthly basis.		23
Apr-18	Occupational Safety and Health	OSH Management Systems	The OSH policy has not been developed in consultation with workers and their representatives.	Review the OSH policy in consultation with workers' representatives and also include law requirements pertaining to OSH.		11
Apr-18	Occupational Safety and Health	Chemicals and Hazardous Substances	No updated inventory is available for chemicals and hazardous substances used in the workplace.	Keep the inventory of chemical updated.	The factory updated the inventory to include all chemicals used in the factory.	23
Apr-18	Occupational Safety and Health	Chemicals and Hazardous Substances	Unidentified containers.	Assign accountability to maintenance team and train workers in chemical handling procedures.		23
Apr-18	Occupational Safety and Health	Chemicals and Hazardous Substances	Chemicals were not stored properly.	Keep and store chemical substances in an adequate area.		11
Apr-18	Occupational Safety and Health	Chemicals and Hazardous Substances	No MSDSs were available in the chemical room of building 32 where chemicals such as paints, diesel and electrolyte are stored.	Ensure that MSDS are available for all the chemicals used in the factory. Train workers in chemical handling procedures.		23
Apr-18	Occupational Safety and Health	Chemicals and Hazardous Substances	The factory did not isolate the use of chemicals such as Blow Out in the spot cleaning areas in building 31 and 32 .	Train workers that are using chemicals and hazardous substances.		11
Apr-18	Occupational Safety and Health	Chemicals and Hazardous Substances	No eye wash station in the laundry room where chemicals and hazardous substances are used.	Install an eye wash station in the laundry room.	Eye wash facilities are accessible to laundry room's workers.	35
Apr-18	Occupational Safety and Health	Worker Protection	The factory did not provide earplugs for workers in the generator room of building 31.	Provide earplugs for workers in the generator room.		23

Apr-18	Occupational Safety and Health	Worker Protection	Standing workers in the packing area and quality section were not provided with foot rests or shock absorbing mats.	Provide foot rests or shock absorbing mats to standing workers in the packing area and quality section.	The factory provides the shock absorbing mats to all standing workers.	23
Apr-18	Occupational Safety and Health	Worker Protection	Electrical installations not properly maintained.	Ensure the electrical system is properly maintained. Ensure that sources of ignition are properly safeguarded.		23
Apr-18	Occupational Safety and Health	Worker Protection	One electrical panel missing safety warning signs in the Laundry room of building 31.	Post safety warning sign is posted in the electrical panel in the Laundry room of building 31.		23
Apr-18	Occupational Safety and Health	Working Environment	The workplace temperatures exceed the recommended 30 C in packing, sewing and pressing sections.	Ensure that temperature is below 30 C.		23
Apr-18	Occupational Safety and Health	Working Environment	The level of lighting in the workplace were unacceptable in sewing, quality and Packing sections.	Ensure that the workplace is adequately lit.		23
Apr-18	Occupational Safety and Health	Welfare Facilities	Soap was not available in building 32 and 31.	Ensure that soap is available in the toilets.	The maintenance team receive instruction to regularly check on the availability of the soaps and papers.	11
Apr-18	Occupational Safety and Health	Welfare Facilities	The eating area can only accommodate 50 percent of the workers.	Ensure that the eating area can accommodate all the workers.		11
Apr-18	Occupational Safety and Health	Health Services and First Aid	Interviewed workers stated that the factory does not provide health checks to workers exposed to work-related hazards.	Provide workers exposed to work-related hazard with an health check twice a year.	The factory scheduled more than two Health checks for the workers who are exposed to work-related hazards. The two workers completed the second medical check ups in August 2018.	23
Apr-18	Occupational Safety and Health	Health Services and First Aid	Insufficient number of onsite medical staff.	Ensure that the medical staff is adequate regarding the workforce.	Since the company has reduced its workforce and operate with less 700 workers. The number of medical staff available in the factory is compliant with the labor Code.	23

Apr-18	Occupational Safety and Health	Health Services and First Aid	One first aid box was not accessible in the pressing section of building 31.	Ensure that all first aid box are accessible during the working time.	The key keepers are two people working in the area of the first aid. Their pictures are posted above the box, so the workers can identify who they are.	11
Apr-18	Occupational Safety and Health	Health Services and First Aid	Less than the 10 percent of the workforce were trained in first aid,.	Ensure that 10 percent of the workforce is trained in first aid.		23
Apr-18	Occupational Safety and Health	Emergency Preparedness	One 1 fire extinguisher in the packing area of building 31 was obstructed by a board. Fire extinguisher was missing in the packing area of building 52.	Ensure the workplace has an adequate firefighting system. Perform regular OSH assessment.	An external service provider is responsible to check the fire extinguisher on a regular basis. Internally, the compliance team is responsible to perform on a monthly basis.	23
Apr-18	Occupational Safety and Health	Emergency Preparedness	Less than the 10 percent of the workforce ere trained in firefighting.	Train 10 percent of the workforce in firefighting.		11
Apr-18	Occupational Safety and Health	Emergency Preparedness	The current evacuation plans in building 32 have not been updated.	Update the evacuation plan in building 32 accordingly.		11
Apr-18	Working Time	Regular Hours	The employer has not posted the factory's working hours.	Post factory's working hours.	The factory has posted the working hours.	23
Assessment June 2017						
Jun-17	Compensation	Overtime Wages	Inaccurate payment for night shift work.	Pay for night shift work according to the Labor Code.	A security company has been hired to only cover the night shift.	
Jun-17	Compensation	Paid Leave	Inaccurate payment for non-working holidays.	Pay for non-working holidays according to the Labor Code.	The factory is accurately paying for non-working holidays based on the workers' average earnings.	
Jun-17	Compensation	Paid Leave	Inaccurate payments for weekly rest days.	Pay for weekly rest days according to the Labor Code.	Since June 2017, the factory is accurately paying for weekly rest days based on the workers' average earnings.	
Jun-17	Compensation	Social Security and Other Benefits	Late and inaccurately calculated ONA payments.	Comply with the law regarding ONA contributions.	The factory now calculates ONA contributions based on the basic salary as stipulated by the law.	

Jun-17	Compensation	Social Security and Other Benefits	Late and inaccurately calculated ONA payments. The workers' contribution is higher than what is legally required.	Comply with the law regarding ONA contributions.	The factory now calculates ONA contributions based on the basic salary as stipulated by the law.	
Jun-17	Compensation	Social Security and Other Benefits	OFATMA contributions are inaccurate and no contributions are paid on behalf of the workers in Building 32.	Register the workers of Building 32 for OFATMA's maternity and health insurance services.	All the workers of Building 32 have been registered for OFATMA's maternity and health insurance. The factory has also started to pay monthly contributions to OFATMA for this service. However, the deductions are still based on the workers' total earnings instead of their base salary.	
Jun-17	Compensation	Social Security and Other Benefits	OFATMA contributions are inaccurate and no contributions are collected and forwarded on behalf of the workers in Building 32.	Collect and forward contributions from the workers' of Building 32 for OFATMA's maternity and health insurance services. Ensure that these monthly deductions from the workers' salaries are accurate.	The workers from Building 32 have been registered for OFATMA's maternity and health insurance services. However, the deductions are still based on the workers' total earnings instead of their base salary.	
Jun-17	Contract and Human Resources	Termination	No notifications sent to MAST before initiating temporary suspensions.	Notify the Ministry of Labor prior to initiating temporary suspensions.	Management attended the labor law training provided by Better Work and reviewed the procedures related to communication and coordination between the Human Resources and the Production departments regarding workforce capacity adjustments.	
Jun-17	Occupational Safety and Health	OSH Management Systems	Records for work-related accidents are not sent to OFATMA on a monthly basis.	Send monthly work-related accidents and diseases records to OFATMA.	The factory is sending work-related accidents and diseases reports on a monthly basis.	
Jun-17	Occupational Safety and Health	Chemicals and Hazardous Substances	No updated inventory of chemicals and hazardous substances maintained in the workplace.	Keep an inventory of chemicals and hazardous substances used in the workplace.	The factory keeps an inventory of all chemicals.	
Jun-17	Occupational Safety and Health	Chemicals and Hazardous Substances	During the factory tour, EAs observed 2 unlabeled chemical containers in the chemical room of Building 32.	Label all chemical containers used in the workplace.	The factory labeled all the chemical containers in the chemical room.	

Jun-17	Occupational Safety and Health	Chemicals and Hazardous Substances	No MSDS' were found for thinner and blow out in the spot cleaning and chemical storage areas of Buildings 32.	Post MSDS' for all chemicals used and stored in the workplace.	During the assessment, the factory took immediate corrective action and posted the corresponding MSDS' in the noted areas.	
Jun-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Documented evidence of chemical safety training for workers were unavailable.	Document and record safety training provided to workers.	The factory has started to document training conducted for workers and shared the last training records with the BW advisor.	
Jun-17	Occupational Safety and Health	Chemicals and Hazardous Substances	No eye washing facilities were available for workers in the spot cleaning area of Building 32. Eye washing solution was missing in the chemical room of Building 31.	Provide eye washing facilities where needed.	The factory installed one eye washing station in Building 32. They have also ordered another washing station for the chemical room in Building 31.	
Jun-17	Occupational Safety and Health	Worker Protection	Inappropriate masks were provided to workers using chemicals in the spot cleaning area of Building 32.	Provide appropriate personal protective equipment to workers who are using chemicals.	The factory provided appropriate masks for workers in the spot cleaning area.	
Jun-17	Occupational Safety and Health	Worker Protection	Shock absorbing mats were not provided to several standing workers in the packing and inspection sections of Building 32.	Provide shock absorbing mats or foot rests to standing workers in the noted sections of Building 32.	The factory provided shock absorbing mats to all standing workers	
Jun-17	Occupational Safety and Health	Worker Protection	More than 30 percent of all machines in Building 32 were missing pulley guards. Also, 15 percent of the single needle machines were missing finger guards.	Install all the necessary safety guards on the machines.	Pulley guards have been installed on all machines in both buildings. Eye guards have been installed on 95% of the concerned machines. The issue with the missing finger guards is still pending.	
Jun-17	Occupational Safety and Health	Worker Protection	Several electrical wires were dusty or uncovered. Also, access to 1 electrical box was obstructed by piles of cartons near the mechanic shop in Building 32.	Safeguard all potential sources of ignition. Properly maintain all types of the electrical equipment.	The factory cleared access to all electrical boxes in the factory.	
Jun-17	Occupational Safety and Health	Working Environment	The temperature was over 30 C in the sewing, packing, quality and pressing sections.	Ensure that workplace temperatures are maintained under the Better Work recommended limit of 30 C.		
Jun-17	Occupational Safety and Health	Working Environment	Inadequate lighting noted in the packing, cutting, sewing, quality and pressing sections.	Ensure that light levels are adequate in the noted sections.		

Jun-17	Occupational Safety and Health	Working Environment	The compressor room in Building 32 is not clean and tidy.	Ensure that the compressor room is clean and tidy at all times.	The factory has assigned a person in charge of regularly monitoring the cleanliness of the compressor room.	
Jun-17	Occupational Safety and Health	Welfare Facilities	The factory does not have the required number of toilets for workers.	Provide the required number of toilets for workers according to the Haitian Labor Code.	The factory now provides an adequate number of functioning toilets for workers in accordance with the law.	
Jun-17	Occupational Safety and Health	Health Services and First Aid	No medical checks arranged for newly hired workers within the first three months of employment.	Arrange medical checks for newly hired workers within the first three months of employment.	The factory has assigned the onsite doctor to conduct health checks for newly hired workers within their first three months of employment.	
Jun-17	Occupational Safety and Health	Health Services and First Aid	No periodic medical checks were arranged for workers who have been exposed to work-related hazards.	Arrange, at least, two medical checks for workers who have been exposed to work-related hazards.	The factory has assigned the onsite doctor to conduct health checks for workers who have been exposed to work-related hazards.	
Jun-17	Occupational Safety and Health	Health Services and First Aid	Only 35 percent of the workers received annual medical checks.	Arrange at least one annual health check per year for all workers.	The factory has scheduled to complete annual health checks for the remaining workers through OFATMA by the end of this year.	
Jun-17	Occupational Safety and Health	Health Services and First Aid	Insufficient number of onsite medical staff.	Have a permanent onsite medical service, with at least 3 nurses and 3 doctor's visits per week.	The factory signed a new contract with a doctor who will be available onsite for 6 days a week; the doctor's weekly hours will be equally divided between the two factory units.	
Jun-17	Occupational Safety and Health	Health Services and First Aid	Insufficient number of worker trained in first-aid.	Train a sufficient number of workers on first aid.	The factory provided first aid training to 40 additional workers this year. Along with the workers who have been previously trained, the factory is now in compliance with this requirement.	
Jun-17	Occupational Safety and Health	Emergency Preparedness	3 obstructed and one overcharged fire extinguishers.	Ensure that access to fire extinguishers remain unobstructed. Regularly check that the fire fighting equipment are always functional.	Daily internal checks are performed to ensure that the fire fighting equipment are easily accessible and functional at all times.	

Jun-17	Occupational Safety and Health	Emergency Preparedness	Only one fire drill conducted per year.	Perform at least 2 fire drills per year as per Better Work's recommendation.	The factory conducted two drills in 2017, one was in February and another in August 2017.	
Jun-17	Working Time	Regular Hours	Pregnant women are not aware of their right to take two additional breaks of half hour each.	Develop a policy and inform pregnant workers about their right to take two additional breaks per day.	The factory had an awareness meeting with all the pregnant women employed at the factory. Informational notices have also been posted throughout the floor.	



Factory: Interamerican Woven S.A.
Location: Port-Au-Prince
Number of workers: 1203
Date of BW registration: Oct-09
Date of last two Better Work assessments: Oct-16 Aug-17

Advisory and Training Services

28-Jun-18 Advisory visit on the Improvement plan with the Compliance officer and the Human resource officer. Review of the document submitted related to OSH management system and Human Resources. A factory tour was performed to validate the factory's progress.

19-Apr-18 PICC meeting on PICC guidelines and its differences with the a trade union committee.

18-Apr-18 Advisory visit on Management system with compliance officer. Improvement plan update and review of document submitted. Factory tour with OSH committee members to validate the OSH remediations.

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDIATION EFFORTS	MONTHS
Assessment August 2017						
Aug-17	Compensation	Overtime Wages	Attendance records do not reflect the actual hours worked for workers in the sewing line.	Ensure that attendance records reflects exactly the working time for all workers.	The factory compensated workers for overtime accurately.	17
Aug-17	Compensation	Wage Information, Use and Deduction	Inaccurate Payroll records. Time records were inconsistent with the payrolls for overtime hours.	Record overtime hour worked, and keep only one accurate payroll.	The factory technician has finalized the system changes to reflect the accurate overtime which be reflected on the May payroll payment.	17
Aug-17	Compensation	Paid Leave	Payments for sick leaves are based on the minimum wage instead of average earnings.	Ensure that payments for sick leave are based on workers' average earnings.	Sick leave are based on the workers average earnings.	17
Aug-17	Compensation	Paid Leave	Payments for maternity leaves are based on the minimum wage instead of average earnings.	Ensure that payments for maternity leaves are based on workers average earnings.	Maternity leave are based on the workers average earnings.	17
Aug-17	Compensation	Social Security and Other Benefits	Employer contributions to ONA are based on a fixed salary for all workers.	Ensure that ONA payments are based on the base salary instead of a fixed salary for all workers.		50
Aug-17	Compensation	Social Security and Other Benefits	Collecting and forwarding worker's contributions for social insurance funds to ONA.	Ensure that ONA payments are based on the basic salary for all workers.		50

Aug-17	Compensation	Social Security and Other Benefits	Employer contribution to OFATMA for work-related accident insurance.	Ensure that employers' contributions to OFATMA for work-related accident insurance is based on workers' basic salary.		50
Aug-17	Compensation	Social Security and Other Benefits	Workers' contributions to OFATMA for maternity and health insurance.	Collect and forward workers' contributions to OFATMA for maternity and health insurance.	The factory is in the process of registering workers to OFATMA for maternity and health insurance.	50
Aug-17	Compensation	Social Security and Other Benefits	Employer contribution to OFATMA for maternity and health insurance.	Pay the employer contribution to OFATMA for maternity and health insurance services.	The factory is in the process of registering workers to OFATMA for maternity and health insurance.	50
Aug-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Inventory of chemicals and hazardous substances used in the workplace is not up to date.	Keep an inventory of chemicals and hazardous substances used in the workplace.	The factory keeps an inventory of chemicals used in the workplace.	13
Aug-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Unlabeled containers	Ensure that all containers are labeled	The factory bought new containers and labeled them before giving them to workers.	32
Aug-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Chemicals and hazardous substances not properly stored.	Store chemicals and hazardous substances in the designated chemical warehouse.	All chemicals have been rearranged and labeled and stored in the chemical room.	13
Aug-17	Occupational Safety and Health	Chemicals and Hazardous Substances	MSDS Not available for all chemicals.	Ensure that the MSDS for all hazardous chemicals used in the workplace are available. Translate the MSDS in local language as needed.	MSDS are available for all chemicals used in the workplace.	32
Aug-17	Occupational Safety and Health	Chemicals and Hazardous Substances	No actions taken to limit workers exposure to hazardous substances.	Measure workers' exposure to hazardous substances.	The nurses and doctors on site trained workers exposed on the use of chemicals and hazardous substances.	32
Aug-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Washing facilities or cleansing materials are not available in the event of chemical exposure.	Provide adequate washing facilities and cleansing materials in the event of exposure to hazardous chemicals.	Eye wash station were installed in adequate location near spot cleaning area.	32

Aug-17	Occupational Safety and Health	Worker Protection	No training on the safe use of boilers were provided to the assessors at the time of assessment.	Train and encourage workers to use PPE, machines and equipment safely.	The factory trained the maintenance team on Boiler Safety and procedures. Moreover, the factory has purchased additional PPE to be available in the boiler and generator room in addition to the regular equipment available.	13
Aug-17	Occupational Safety and Health	Worker Protection	Guards are not installed on all dangerous parts of machines and equipment.	Install proper guards and maintain them on all dangerous parts of machines and equipment.	The factory completed the installation of the pulley guards on 70 percent of the sewing machines. Equipment for the remaining ones has been purchased and installation completed soon.	50
Aug-17	Occupational Safety and Health	Worker Protection	Lack of electrical maintenance	Ensure that electrical wires, cables, switches, plugs and equipment are properly maintained.	The electrical box in the boiler room of Building 29 was covered.	35
Aug-17	Occupational Safety and Health	Worker Protection	1 electrical box in the boiler room of Building 29 was missing a hazard warning sign.	Identify electrical hazards and post safety warnings in the workplace.	The warning sign was posted on the electrical box in the boiler room.	13
Aug-17	Occupational Safety and Health	Working Environment	Workplace temperature exceeds BW recommended limit of 30 C.	Improve the temperature levels throughout the workplace.	The factory bought fans to replace those that were damaged.	32
Aug-17	Occupational Safety and Health	Working Environment	Workplace lighting does not reach Better work recommended limits in sewing and packing. sections.	Increase the light level in the indicated areas.	The factory replaces defective bulbs on a weekly basis to avoid those types of issues.	13
Aug-17	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets.	Ensure that the factory has 13 functioning toilets for men and 43 functioning toilets for women.	The factory has repeatedly asked SONAPI for this since they are renting the buildings from SONAPI. No waiting lines are seen in front of toilets.	86
Aug-17	Occupational Safety and Health	Welfare Facilities	The capacity of the eating area is not sufficient to accommodate all the workers.	Ensure that the eating area can accommodate all workers.	The factory arranged a covered area in front of each of their buildings with tables as an eating area.	86
Aug-17	Occupational Safety and Health	Health Services and First Aid	Insufficient medical staff.	Hire additional medical staff, at least 7 nurses and 3 doctor's visit per week.	The factory counts 3 nurses, 1 permanent doctor and another doctor who comes one day per week but is available on a needs basis on all days.	32

Aug-17	Occupational Safety and Health	Health Services and First Aid	Access to 1 first aid box in Building 10 was obstructed by boxes at the time of assessment.	Ensure first aid box are accessible and remain unobstructed.	First aid boxes in building 10 are accessible.	32
Aug-17	Occupational Safety and Health	Emergency Preparedness	No smoke detectors were observed in the trim warehouse of Building 30.	Install fire detection and alarm system.	Smoke detector was installed in the warehouse of Building 30.	13
Aug-17	Occupational Safety and Health	Emergency Preparedness	Obstructed and missing fire fighting equipment.	Replace missing fire extinguishers and ensure they are not obstructed. Identify a person in charge of the daily verification.	The factory called its supplier for the maintenance of the extinguishers to fix and replace the missing ones.	32
Aug-17	Occupational Safety and Health	Emergency Preparedness	Operating procedures not available for boilers.	Ensure that the procedure is available and train operators on the safe use of boilers.	Operating Procedures for the boilers are available and workers have been trained on their safe use.	13
Aug-17	Working Time	Regular Hours	Attendance records not accurate.	Ensure that the attendance records reflects the exact working time.	The factory reviewed the punching system to take into account workers who punch after 4 pm.	17
Aug-17	Working Time	Overtime	Excessive overtime.	Ensure that workers do not exceed the legal limit of overtime hours.		35
Aug-17	Freedom of Association and Collective Bargaining	Interference and Discrimination	Termination or non-renewal of workers employment contract due to union membership or activities. 32 workers including 11 union leaders were dismissed for participating in union activities.	Reinstate the 11 terminated union officers. Implement a freedom of association policy signed by top management. Train all relevant staff on freedom of association.	The factory is not intending to reinstate the workers.	13
Assessment October 2016						
Oct-16	Compensation	Social Security and Other Benefits	Employer contribution to OFATMA for maternity and health insurance.	Register with OFATMA for health and maternity insurance and pay employer contribution to OFATMA for maternity and health insurance.	The process of subscribing to OFATMA maternity and Health insurance is on going. The management is collecting workers' files.	
Oct-16	Occupational Safety and Health	Welfare Facilities	The factory does not have an appropriate eating area.	Provide eating area for all workers.	The factory arranged a covered area in front of each of their buildings with tables as an eating area.	
Oct-16	Compensation	Overtime Wages	Overtime hours are not reported in the payroll records for all workers.	Ensure that payroll records are accurate and reflect all the actual working hours. Compensate workers for overtime work.	The factory compensated workers for overtime accurately.	

Oct-16	Compensation	Overtime Wages	Night hours are not paid at 100% above the normal wage.	Ensure that the payroll records are accurate and reflect the real working time. Pay workers correctly for night hours after 6:00 PM.	Night shift are paid as requested by law.	
Oct-16	Compensation	Wage Information, Use and Deduction	Time records inconsistent with the payroll.	Ensure that payroll records are accurate and reflect all the actual working hours. Compensate workers for overtime work.	Factory compensated the workers accurately for overtime.	
Oct-16	Compensation	Paid Leave	Payment for sick leave is based on the minimum wage instead of the workers' average earnings.	Ensure that the payment for sick leaves is based on the workers' average earnings as stipulated by the labor code.	Payment for sick leave is based on the workers' average earnings.	
Oct-16	Compensation	Paid Leave	Payment for maternity leaves is based on the minimum wage instead of the workers' average earnings.	Ensure that the payment for maternity leave is based on the workers' average earnings as stipulated by the labor code.	Payment for maternity leave is based on the workers' average earnings.	
Oct-16	Compensation	Social Security and Other Benefits	Inaccurate and late payment for employer's contribution to ONA.	Ensure that the workers' contributions are accurately calculated and forwarded to ONA on time.	The factory decided to continue to apply their existing calculation principle for ONA payments.	
Oct-16	Compensation	Social Security and Other Benefits	Inaccurate and late submission of workers' contribution to ONA.	Ensure that the workers' contributions are accurately calculated and forwarded to ONA on time.	The factory decided to continue to apply their existing calculation principle for ONA payments.	
Oct-16	Compensation	Social Security and Other Benefits	Inaccurate payment of employer's contribution for work related accident insurance.	Ensure that the employer's contributions for work related-accident insurance are accurately calculated and sent to OFATMA		
Oct-16	Compensation	Social Security and Other Benefits	The factory is not registered with OFATMA for maternity and health insurance.	Complete the registration process with OFATMA to ensure maternity and health insurance services for all workers.	The process of subscribing to OFATMA maternity and Health insurance is on going. The management is collecting workers' files.	
Oct-16	Occupational Safety and Health	Chemicals and Hazardous Substances	Unidentified chemical containers observed in the workplace.	Ensure that all chemical containers are identified and stored safely.	All chemical containers have been identified and stored safely.	
Oct-16	Occupational Safety and Health	Chemicals and Hazardous Substances	MSDS not available for all chemicals used in the workplace.	Ensure that MSDS are available within the chemical room.	MSDS have been made available within the chemical room.	

Oct-16	Occupational Safety and Health	Chemicals and Hazardous Substances	No actions taken to assess, monitor, prevent and limit workers' exposure to chemicals and hazardous substances.	Maintain records for OSH self-assessments. Limit access of workers to chemicals in the workplace. Train and assign staff to record workers' exposure to hazardous chemicals and substances.	Management identified departments throughout the plant where workers may be vulnerable to excessive exposure to chemicals. The onsite doctor has been assigned to train workers and record workers' exposure to hazardous chemicals and substances. New fans have been installed and more will be added to improve ventilation.	
Oct-16	Occupational Safety and Health	Chemicals and Hazardous Substances	Several workers in the washing room and spot cleaning area were not using the PPE provided.	Provide safety training to workers using chemicals and hazardous substances and maintain adequate training records.	The factory provides PPE to all workers as needed and are implementing measures to ensure proper use of PPEs. Workers are also being trained on the regular use of PPE. The factory has also purchased extra PPE to be available in the boiler and generator room in addition to the regular equipment available.	
Oct-16	Occupational Safety and Health	Chemicals and Hazardous Substances	Washing facilities and cleansing materials are not available in all areas where chemicals are used or stored.	Provide washing facilities and cleansing materials near all areas where chemicals or hazardous materials are used or stored.	Eye wash stations have been installed in the suggested areas.	
Oct-16	Occupational Safety and Health	Worker Protection	The quantity of personal protective equipment available in the mechanic shop was not sufficient for all the workers in this section.	Provide personal protective equipment to all workers, as needed. Conduct awareness training to reinforce safe working practices.	Additional PPE have been provided in the mechanic shop. The factory provides PPE to all workers as needed and are implementing measures to ensure proper use of PPEs. Workers are also being trained on the use of PPE.	
Oct-16	Occupational Safety and Health	Worker Protection	Several workers were not using the protective devices attached to their machines or the PPE provided to them.	Provide training to ensure that workers are aware of safe working practices and follow them accordingly. Maintain records of all training sessions.	Management regularly makes safety announcements through the factory's notification system to remind workers about safety procedures. Several training sessions has been organized.	
Oct-16	Occupational Safety and Health	Worker Protection	Several sewing machines did not have eye, pulley or belt guards nor finger guards.	Ensure that the system to monitor the availability of machine guards is operational and effective. Liaise with the head mechanic to ensure that the guards are replaced on time.	Meetings have been organized with the mechanics and production managers to strengthen the monitoring system. Additional training will also be provided to workers.	

Oct-16	Occupational Safety and Health	Worker Protection	Exposed wires were observed in the compressor room in Building 30.	Establish an effective OSH management system. Ensure electrical wires, switches and plugs are properly installed, grounded, and maintained.	This exposed wires in the compressor room have been fixed.	
Oct-16	Occupational Safety and Health	Working Environment	Workplace temperatures exceeded the BW recommended limit of 30C.	Maintain a maximum temperature of 30C for all sections.	New fans have been installed and non-functioning exhaust fans have been repaired. The factory also purchased additional fans to have them	
Oct-16	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets for women.	Comply with the Haitian labor code regarding the total number of toilets.	The factory has repeatedly asked SONAPI for this since they are renting the buildings from SONAPI. No waiting lines are seen in front of toilets.	
Oct-16	Occupational Safety and Health	Health Services and First Aid	No annual medical checks provided to workers within the first three months of hiring.	Ensure that medical checks are provided to workers within the first three months of hiring.	Since February 2017, the factory has employed an additional permanent doctor and a nurse. The newly hired doctor will be in charge of this requirement.	
Oct-16	Occupational Safety and Health	Health Services and First Aid	Workers who are exposed to work-related hazards have not received periodic free health checks.	Ensure that workers who are exposed to work-related hazards receive free periodic health checks.	Since February 2017, the factory has employed an additional permanent doctor and a nurse. The newly hired doctor is in charge of this requirement.	
Oct-16	Occupational Safety and Health	Health Services and First Aid	No annual medical checks were provided to workers.	Provide free annual medical checks for workers. Follow-up with OFATMA to ensure that they either provide this service or refer the factory to another organization that can provide free medical checks.	Since February 2017, the factory has employed an additional permanent doctor and a nurse. The newly hired doctor is in charge of this requirement.	
Oct-16	Occupational Safety and Health	Health Services and First Aid	Insufficient medical staff.	Comply with the Haitian labor code regarding the employment of on site medical staff.	The factory has increased the number of medical staff.	
Oct-16	Occupational Safety and Health	Emergency Preparedness	Several fire extinguishers were missing, obstructed or without identification signs.	Replace dysfunctional alarms. Test and inspect alarm systems on monthly basis.	The fire alarm system was replaced. A smoke alarm system has been ordered installed.	
Oct-16	Occupational Safety and Health	Emergency Preparedness	No regular fire drills.	Conduct a minimum of two emergency drills per year.	Minimum of two emergency drills per year done.	

Oct-16	Working Time	Regular Hours	Attendance records do not always reflect the actual hours for workers on an incentive scheme in the sewing department.	Ensure that the attendance records reflect the exact working time	The factory technician has finalized the system changes to reflect the accurate overtime which be reflected on the May payroll payment.	
Oct-16	Working Time	Overtime	The factory does not have prior authorization from the Department of Labor for working at night.	Obtain a valid authorization from the Department of Labor before working at night.	Valid authorization obtained.	
Oct-16	Working Time	Overtime	Workers in some sections worked beyond 80 hours of overtime during a 3-month period.	Comply with the Labor Code by limiting overtime to 80 hours during a 3-month period.	Human resource officers received a training on labor law. Management will ensure that law is applied accordingly.	
Oct-16	Working Time	Overtime	The factory does not have prior authorization from the Department of Labor for working on Sundays.	Obtain valid authorization from the Department of Labor before working on Sundays.	Valid authorization obtained.	
Oct-16	Working Time	Overtime	The factory does not have prior authorization from the Department of Labor for working overtime.	Obtain valid authorization from the Department of Labor before working overtime.	Valid authorization obtained.	



Factory: LIFE S.A.
Location: Port-au-Prince
Number of workers: 148
Date of BW registration: Sep-09
Date of last two Better Work assessments: Oct-17 Nov-16

Advisory and Training Services

28-Sep-18 Meeting with the Operation Manager on the factory current economical situation. Review of the termination files and procedures upon mass lay off. Discussion with the 2 remained members of the trade union committee on the factory's current economical situation. factory tour to validate OSH remediations.
 27-Jul-18 PICC meeting to discuss on the temporary suspension and security issue in the workplace.
 27-Jul-18 Meeting with management on the general updates and Improvement plan.
 Meeting with PICC members on the workplace communication, security issues and the strike that occurred on June 12.
 24-Apr-18 Occupational safety and health training.
 24-Apr-18 Meeting with management on the Improvement plan- Review of last assessment report management system question with compliance officer. Factory tour to validate OSH remediation.
 6-Apr-18 Industry Seminar on the Compliance Assessment Tool

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDATION EFFORTS	MONTHS
Assessment October 2017						
Oct-17	Compensation	Social Security and Other Benefits	Late ONA payment. Holiday pay is not included in ONA deductions.	Comply with the law on ONA payments.	All payments are included in the calculation of ONA except overtime as required by law.	24
Oct-17	Compensation	Social Security and Other Benefits	Late ONA payment. Holiday pay is not included in ONA deductions.	Pay the ONA payment accordingly.	All payments are included in the calculation of ONA except overtime as required by law.	24
Oct-17	Compensation	Social Security and Other Benefits	No registration to OFATMA for maternity and health insurance	Register to OFATMA for maternity and health insurance		24
Oct-17	Compensation	Social Security and Other Benefits	No registration to OFATMA for maternity and health insurance	Register for OFATMA for maternity and health insurance		24
Oct-17	Occupational Safety and Health	OSH Management Systems	The existing policy has not been signed by top management.	Have the OSH policy signed by top management.	The OSH policy is signed by top management.	12
Oct-17	Occupational Safety and Health	Chemicals and Hazardous Substances	The inventory of chemicals and hazardous substances used in the workplace is not regularly updated	Keep an updated inventory of chemicals and hazardous substances used in the workplace.	The factory keeps an inventory of chemical substances used in the workplace	24

Oct-17	Occupational Safety and Health	Worker Protection	Several standing workers were not provided with foot rests or shock absorbing mats.	Provide foot rests or shock absorbing mats to standing workers.	The factory equipped all inspection tables with footrests. All standing workers have been trained about their usage.	24
Oct-17	Occupational Safety and Health	Working Environment	Temperature exceeds the recommended 30C.	Ensure that the temperature level, inside the workplace is under 30C.		24
Oct-17	Occupational Safety and Health	Health Services and First Aid	The factory does not provide workers with proper health checks within the first three months of hiring.	Ensure that workers receive proper health checks within the first three months of hiring	The factory hired a doctor who comes 3 times a week and 1 Saturday a month to provide health checks to workers	24
Oct-17	Occupational Safety and Health	Health Services and First Aid	The factory does not provide workers with proper annual health checks.	Ensure that all workers received an annual medical check. Document properly all the evidences of annual checks provided.	The factory hired a doctor who comes 3 times a week and 1 Saturday a month to provide health checks to workers.	12
Oct-17	Occupational Safety and Health	Health Services and First Aid	Insufficient medical staff	Ensure to have a permanent onsite medical service with at least, 1 nurse and 2 doctor's visits per week.	The factory has a permanent onsite medical service with 1 nurse and 3 doctor's visit	24
Oct-17	Occupational Safety and Health	Health Services and First Aid	No systematic medical checks for exposed to work related hazards.	Ensure to systematic medical checks for workers exposed to work related hazards.	The factory hired he a doctor who comes 3 times a week and 1 Saturday a month to provide health checks to workers	12
Oct-17	Occupational Safety and Health	Emergency Preparedness	The current evacuation plan in the fabric warehouse has not been updated to indicate the actual escape routes.	Update the evacuation plan in the fabric warehouse		12
Nov-16	Compensation	Social Security and Other Benefits	Late ONA payments and incorrect calculation	Ensure the timely payment of the employer's contribution to ONA.	The employer contributes 6 % of workers' base salaries to ONA on a monthly basis.	
Assessment Nov 2016						
Nov-16	Compensation	Social Security and Other Benefits	Late ONA payment and incorrect calculation	Ensure that ONA's payment is on time meaning that payment of the current month should be paid within the first 10 working days of the following month.	The employer contributes 6 % of workers' base salaries to ONA on a monthly basis.	

Nov-16	Compensation	Social Security and Other Benefits	No payment was made for OFATMA's work-related accident insurance for the 2016-2017 fiscal year	Ensure payment to OFATMA's work-related accident insurance accurately.	The factory has an agreement with OFATMA to pay the amount in two times. They finalized their last payment for the fiscal year 2016-2017.	
Nov-16	Compensation	Social Security and Other Benefits	No registration with OFATMA for maternity and health insurance.	Ensure registration with OFATMA for maternity and health insurance.		
Nov-16	Compensation	Social Security and Other Benefits	No registration with OFATMA for maternity and health insurance.	Ensure to register the workers for OFATMA's maternity and health insurance.		
Nov-16	Contract and Human Resources	Employment Contracts	Internal work rules are still pending for approval from MAST.	Ensure to obtain the MAST approval for the internal work rules of the factory.	The internal work rules was approved in May 2017.	
Nov-16	Contract and Human Resources	Contracting Procedures	A non-production worker did not received any overtime payments but stayed after regular hour to clean for a sister company named DOTS.	Ensure payment of overtime to workers as soon as they perform overtime.	The factory is completely separated from DOTS. They relocated the administrative office to avoid confusion. The factory is accountable for his own employees.	
Nov-16	Occupational Safety and Health	OSH Management Systems	No document available to proof OSH self-assessments.	Ensure to well report any activity related to OSH self-assessments.	The factory has a log to report OSH self-assessments on a monthly basis.	
Nov-16	Occupational Safety and Health	OSH Management Systems	No record of work-related accidents submitted to OFATMA.	Ensure submission of work-related accident so OFATMA on a monthly basis.		
Nov-16	Occupational Safety and Health	Chemicals and Hazardous Substances	Management did not provide an inventory of chemical substances used in the workplace.	Ensure availability of inventory of chemical substances used in the workplace.	The factory keeps an inventory of chemical substances used in the workplace.	
Nov-16	Occupational Safety and Health	Chemicals and Hazardous Substances	No PPE provided for workers in the mechanic's shop	Provide PPE to workers in the inspection section were chemicals are used.		
Nov-16	Occupational Safety and Health	Chemicals and Hazardous Substances	No MSDS' for thinner and Blow Out were posted in the mechanic shop and the inspection station.	Ensure to post MSDS' for thinner and blow out where they are used and in general, to post the MSDS' of any chemicals where they are used and stored.	The factory does not use thinner anymore. MSDS' of Blow out is posted on the floor near the inspection station.	

Nov-16	Occupational Safety and Health	Chemicals and Hazardous Substances	Documented evidence of actions taken by management to control and oversee workers' exposure to chemicals and hazardous substances were unavailable during the assessment.	Ensure to have written process to manage chemicals.	The factory does not use chemicals during their washing process anymore. They only use water and liquid soap.	
Nov-16	Occupational Safety and Health	Chemicals and Hazardous Substances	Proof of chemical safety training conducted for workers were unavailable during the assessment.	Ensure to have a written procedure for chemicals management. Keep records of any training performed.		
Nov-16	Occupational Safety and Health	Chemicals and Hazardous Substances	Inadequate washing facilities and cleansing materials provided for workers exposed to hazardous chemicals.	Provide adequate washing facilities to workers exposed to hazardous chemicals.	The factory does not use chemical in his production process. Workers in the spot cleaning use water and liquid soap.	
Nov-16	Occupational Safety and Health	Worker Protection	No ear plug found in the generator room	Ensure to provide the required PPE such as ear plug to workers exposed to high level of noise.	The worker who works in the generator room has been provided with the proper protective equipment, a personal ear protection. He also has been trained on the PPE	
Nov-16	Occupational Safety and Health	Worker Protection	PPE training records were unavailable during the assessment visit.	Ensure to keep the records of any training performed in the factory.		
Nov-16	Occupational Safety and Health	Worker Protection	Workers in the pressing section were not provided with anti-fatigue mats or foot rests.	Provide anti-fatigue mats or foot rest to workers in the pressing sections	The factory equipped all inspection tables with footrests. All standing workers have been trained about their usage.	
Nov-16	Occupational Safety and Health	Worker Protection	More than 61 percent of the single needle machines were missing finger guards.	Install finger guards on the single needle machines. Train workers to not remove such protection items.	The new OSH committee will perform inspections on a weekly basis and notify if a remediation need to be done. New machines have been installed.	
Nov-16	Occupational Safety and Health	Working Environment	Temperatures at the sewing (31 C), quality (31.4 C) and cutting (30.8 C) sections exceeded the BW recommended limit of 30 C.	Ensure the temperature in all sections does not exceed 30 C.		

Nov-16	Occupational Safety and Health	Health Services and First Aid	The factory does not conduct medical checks for newly hired workers within the first three months of employment.	Ensure to perform medical checks for newly hired workers within the first three months of employment.	All the workers that have more than two months have received their medical checks. The factory keeps a log to record the workers who received their yearly medical checks.	
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Factory: Modas Bus II S.A.
Location: Port-au-Prince
Number of workers: 900
Date of BW registration : Jan-14

Date of last two Better Work assessments: Apr-18 Apr-17

Advisory and Training Services

30-Aug-18 Advisory visit to review the training plan and introduction to the online training management system. Introduction to the new online progress report. Follow up on union leader termination case.

27-Jul-18 Advisory visit to review the remediation efforts related to the pending improvement issues. PICC Meeting to discuss on the following points : Water quality, Incentives for indirect workers, termination of union leader, availability of payroll preview, supplies for the clinic.

09-May-18 Advisory visit to validate the improvements with compliance and HR managers. Factory tour to verify the status of OSH issues.

02-May-18 Advisory visit to review the improvements with compliance and HR managers. PICC meeting to validate the latest improvements in relation to compensation, OSH, contracts and HR.

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDATION EFFORTS	MONTHS
Assessment April 2018						
Apr-18	Compensation	Social Security and Other Benefits	The payment of the employer's contribution to ONA was late.	Ensure that ONA is paid every months within the first 10 days.	ONA payment were completed in a timely manner.	6
Apr-18	Compensation	Social Security and Other Benefits	The employer collects workers' contribution to ONA on a regular basis. However, the payment of the workers' contribution to ONA is not submitted on time.	Ensure that ONA is paid every months within the first 10 days.	ONA payment were completed in a timely manner.	7
Apr-18	Contract and Human Resources	Employment Contracts	Workers' contracts did not specify the hours of work as required by law.	Revise contracts to ensure that working hours are included.	The contracts were revised to specify the hours of work as required by law.	8
Apr-18	Occupational Safety and Health	OSH Management Systems	The factory has a written OSH policy that has not been developed in consultation with workers and their representatives.	Review the OSH policy to include reference to compliance with labor law requirements pertaining to OSH. Present the OSH policy to workers' representatives to gather their feedback and update the OSH policy as required before signature.		9
Apr-18	Occupational Safety and Health	Worker Protection	Several sewing machines missing safety guards.	Install the missing machine guards. Ensure regular verification and maintenance.	The factory installed the missing machine guards. The mechanics team is in charge of ensure regular verification and maintenance. The new compliance officer does regular audit.	10

Apr-18	Occupational Safety and Health	Emergency Preparedness	No alarm system was installed in building 53 B.	Install alarm system were installed in building 53 B	The factory installed an alarm system were installed in building 53 B.	11
Apr-18	Occupational Safety and Health	Worker Protection	Batteries were placed on a wooden box instead of steel frame in the generator room. A damaged drill power cord was connected directly inside an electrical panel in the same generator room.		OSH training was offered to Electrical Technicians in order to avoid the risk in Factory. HR Manager and Compliance manager monitor the workplace on a regular basis.	12
Apr-18	Occupational Safety and Health	Welfare Facilities	The eating area can only accommodate 20 percent of the workers.	Add more seats in the eating area. Consider ahveing 2 shifts for lunch break.	0	13
Apr-18	Occupational Safety and Health	Health Services and First Aid	The factory does not provide workers health checks within the first three months of hiring.	Provide workers health checks within the first three months of hiring. Keep adequate records.	The recruitment procedures were reviewed to requesta health certificate as part of the hiring process.	14
Apr-18	Occupational Safety and Health	Health Services and First Aid	The factory does not provide health checks to workers exposed to work-related hazards.	Provide health checks to workers exposed to work-related hazards. Keep adequate records.	0	15
Apr-18	Occupational Safety and Health	Chemicals and Hazardous Substances	The chemicals inventory iw as incomplete.	Review procurement procedures to ensure that chemicals management is centralized. Ensure that one single inventory of all chemicals used in the workplace is maintained and updated. Communicate this new policy to all relevant staff.	The factory has one updated single inventory of all chemicals used in the workplace is maintained and updated. The factory has a chemicals management procedure.	16
Apr-18	Occupational Safety and Health	Chemicals and Hazardous Substances	Chemicals and hazardous substances such as Thinner used in the mechanic workshop and the fusing area were not properly labeled.	Review procurement procedures to ensure that chemicals management is centralized. Ensure that all chemicals used in the workplace are properly labeled. Communicate this new policy to all relevant staff.	All chemicals found in the workplace are labelled. The factory has a chemicals management procedure.	17
Apr-18	Occupational Safety and Health	Chemicals and Hazardous Substances	MSDS were missing for some chemicals and hazardous substances.	Review procurement procedures to ensure that chemicals management is centralized. Ensure that MSDS are posted for all chemicals used in the workplace. Communicate this new policy to all relevant staff.	MSDS are posted for all chemicals used in the workplace. The factory has a chemicals management procedure.	18
Apr-18	Occupational Safety and Health	Chemicals and Hazardous Substances	Workers were found using chemicals without PPE in the fusing area.	Provide PPE in the fusing section where workers were found using chemicals. Consider alternatives to reduce workers' exposure to chemicals in this area.	PPE were provided in the fusing section where workers were found using chemicals.	19

Apr-18	Occupational Safety and Health	Chemicals and Hazardous Substances	There was no eye wash station in the spot cleaning near the entrance of floor 53 B and the Fusing area.	Install eye wash station in the spot cleaning near the entrance of floor 53 B and the Fusing.	Eye wash station was installed in the spot cleaning near the entrance of floor 53 B and the Fusing.	20
Apr-18	Occupational Safety and Health	Worker Protection	Management did not provide gloves and masks for workers in the ironwork workshop shop area using Thinner.	Provide gloves and masks for workers in the ironwork workshop shop area using Thinner.	Earplugs for workers in the generator room were provided .Gloves and masks were provided for workers in the ironwork workshop shop area using Thinner.	21
Apr-18	Occupational Safety and Health	Health Services and First Aid	Insufficient medical staff.	Hire 5 additional nurses as required by law.	0	22
Apr-18	Occupational Safety and Health	Health Services and First Aid	Expired product were found in the first aid boxes.	Replace the expired products from the first aid boxes. Conduct regular OSH assessment to ensure the availability of proper products.		23
Apr-18	Occupational Safety and Health	Health Services and First Aid	Less than the 10 percent of the workforce was trained in first aid.	Provide training in first aid to at least 10 percent of the workforce.	For Training of First Aid the Compliance already proceed of 10 percent of workers trained like 104 persons, we have the Attendance List of all workers received the training.	24
Apr-18	Occupational Safety and Health	Working Environment	Temperature levels exceeded the recommended limits.	Purchase additional fans. Ensure that all exhaust fans are properly functioning. Request quotes for the installation of a cooling system and analyze feasibility.	Additional fans were purchased and installed on the floor.	25
Apr-18	Occupational Safety and Health	Working Environment	Noise levels exceeded the recommended limits.	Reduce the volume of the music in the workplace. Ensure that all sewing and pressing machines are properly maintained to avoid additional noise.	The factory replaced some parts of the sound system to control the noise levels.	26
Apr-18	Occupational Safety and Health	Working Environment	Light levels was below the recommended limits.	Conduct an inspection to verify if all light are functioning in the workplace and repair the broken ones. Ensure that regular maintenance is performed.	The factory replaced the deficient or missing bulbs to provide adequate lighting.	27
Apr-18	Occupational Safety and Health	Emergency Preparedness	Some fire extinguishers were not easily accessible.	Provide OSH training for workers. Conduct regular inspection to ensure that fire extinguishers are not misplaced or obstructed.	The factory conduct regular inspection to ensure that fire extinguishers are not misplaced or obstructed. Additional OSH training was provided for the OSH committee.	28
Apr-18	Occupational Safety and Health	Emergency Preparedness	Less than the 10 percent of the workforce was trained in firefighting.	Provide training in firefighting to at least 10 percent of the workforce.	96 New employees were trained in fire fighting.	29
Apr-18	Occupational Safety and Health	Emergency Preparedness	The current evacuation plans in one building have not been updated to reflect the recently reorganized floor layout.	Update the evacuation plan in the building and post on the floor.	The evacuation plan in building 52 was updated and posted on the floor.	30

Apr-18	Occupational Safety and Health	Emergency Preparedness	Assessors observed that evacuation routes were obstructed.	The floor layout should be revised to ensure that evacuation routes are not obstructed.	0	31
Apr-18	Occupational Safety and Health	Emergency Preparedness	Flammable material such as fabric were observed inside 1 electrical panel in one of the building.	Keep all flammable material away from possible sources of ignition. Train the workers on OSH requirements. Conduct regular inspection to verify that flammable materials are properly solved.		32
Apr-18	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets.	Reallocate some men's toilets for women. Build additional toilets to meet legal requirements. Keep the existing toilets properly maintained.	The factory requested SONAPI authorization to build more toilets.	33
Apr-18	Occupational Safety and Health	Welfare Facilities	The results of the analysis of the drinking water revealed the presence of bacteria.	Share the results of the water test with the drinking water supplier and ensure that they take action to provide safe water. Identify potential new suppliers as possible alternatives. Conduct regular monthly test.	The factory has a new water supplier and the results of the analysis of the drinking water confirmed that it was safe.	34
Apr-18	Occupational Safety and Health	Health Services and First Aid	The factory does not provide workers with free annual health checks.	Provide workers with free annual health checks. Keep adequate records.	The factory started to provide annual medical checks to workers as required.	35
Assessment April 2017						
Apr-17	Compensation	Paid Leave	Payment for weekly rest days.	Ensure that the weekly rest day payment is correct.	The factory revised its payroll procedure and the weekly rest days payment is now based on the average salary.	12
Apr-17	Compensation	Paid Leave	Payment for legally mandated holidays.	Revise payroll procedures to ensure compliance with legal requirements	The factory revised its payment procedures to ensure compliance with legal requirements.	12
Apr-17	Compensation	Social Security and Other Benefits	Collecting and forwarding workers' contributions for social insurance funds to	Revise payroll procedures to ensure compliance with legal requirements	The factory revised its payroll procedures to ensure compliance with legal requirements. ONA payment is now done with base salary.	12
Apr-17	Compensation	Social Security and Other Benefits	Employer contribution to ONA.	Revise payroll procedures to ensure compliance with legal requirements	The factory revised its payroll procedures to ensure compliance with legal requirements. ONA payment is now done with base salary.	12
Apr-17	Compensation	Social Security and Other Benefits	Employer contribution to OFATMA for maternity and health insurance. Collecting and forwarding of workers' contributions to OFATMA.	Registered with OFATMA for the maternity and health insurance.	Management completed the registration process to OFATMA.	12
Apr-17	Compensation	Social Security and Other Benefits	Collecting and forwarding of workers' contributions to OFATMA.	Registered with OFATMA for the maternity and health insurance.	Management completed the registration process to OFATMA.	12

Apr-17	Contract and Human Resources	Dialogue, Discipline and Disputes	Bullying, harassment or humiliating treatment of workers.	Provide training to both Haitian and foreign supervisors on the verbal abuse policy	The factory conducted training for both Haitian and foreign supervisors on the verbal abuse policy. Training was also provided to workers.	20
Apr-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Labeling of chemicals and hazardous substances.	Conduct awareness training for all workers handling chemicals. A system should be put in place to avoid recurrence.	The factory labeled all the chemicals containers and provided training to all workers using chemicals.	48
Apr-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Ensure that all required chemical safety data sheets for all chemicals and hazardous substances are available in the workplace.	Chemical safety data sheets for all chemicals and hazardous substances are available in the workplace.	48
Apr-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Assessing, monitoring, preventing and/or limiting workers' exposure to hazardous substances.	Assess, monitor, prevent and/or limit workers' exposure to hazardous substances.	The factory regularly assessing and monitor workers' exposure to hazardous substances.	12
Apr-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Washing facilities or cleansing materials in the event of chemical exposure were not available in all areas where workers use chemicals.	Provide adequate washing facilities or cleansing materials in the event of chemical exposure.	Washing facilities or cleansing materials in the event of chemical exposure are available.	48
Apr-17	Occupational Safety and Health	Emergency Preparedness	Training workers to use the firefighting equipment	The factory should trained additional workers in fire fighting.	The factory trained additional workers in fire fighting. Based on the current number of workers, the factory is in compliance with the requirements.	12
Apr-17	Occupational Safety and Health	Emergency Preparedness	Some firefighting equipment were not properly maintained.	Ensure that all firefighting equipment are properly maintained and inspected.	The compliance officer regularly verify the firefighting equipment.	12
Apr-17	Occupational Safety and Health	Health Services and First Aid	Annual medical checks for workers.	Increase doctor's visit frequency to 3 visits a week and have doctors perform medical checks.	The factory hired a doctor who conducts the medical checks on a regular basis.	48
Apr-17	Occupational Safety and Health	Health Services and First Aid	No medical checks are provided to workers within the first three months of hiring.	Increase doctor's visit frequency to 3 visits a week and have doctors perform medical checks.	The factory hired a doctor who conducts the medical checks on a regular basis.	12
Apr-17	Occupational Safety and Health	Health Services and First Aid	The factory does not provide free health checks to workers who have been exposed to work related hazards.	Increase doctor's visit frequency to 3 visits a week and have doctors perform medical checks.	The factory hired a doctor who conducts the medical checks on a regular basis.	48
Apr-17	Occupational Safety and Health	Health Services and First Aid	The factory has only 2 nurses. To comply with the Haitian Labor Code, the factory should have a permanent onsite medical service, with at least 5 nurses and 3 doctors' visits each week.	Hire 2 additional nurses and increase doctor's visit frequency to 3 times a week.	The factory hired a doctor who visit 3 times per week.	48
Apr-17	Occupational Safety and Health	Health Services and First Aid	The employer did not ensure that there were a sufficient number of readily accessible first aid boxes/supplies in the workplace.	Ensure that all the first aid boxes/supplies in the workplace are readily accessible .	All the first aid boxes/supplies in the workplace are readily accessible .	12

Apr-17	Occupational Safety and Health	Health Services and First Aid	Insufficient first-aid training for workers.	Provide first-aid training for 10% of workers.		12
Apr-17	Occupational Safety and Health	Welfare Facilities	Insufficient number of Toilets.	Increase the number of toilets.		12
Apr-17	Occupational Safety and Health	Welfare Facilities	Insufficient capacity of eating area.	Increase the capacity of the eating area.		12
Apr-17	Occupational Safety and Health	Worker Protection	Workers using chemicals are not provided with personal protective clothing and equipment.	Worker using chemicals should be provided with personal protective clothing and equipment.	All workers using chemicals are provided with personal protective clothing and equipment.	48
Apr-17	Occupational Safety and Health	Worker Protection	Shock absorbing mats are missing for standing workers.	Provide all standing workers with Shock absorbing mats	All standing workers are provided with shock absorbing mats	12
Apr-17	Occupational Safety and Health	Working Environment	Workplace temperature and/or ventilation is no adequate.	Ensure that workplace temperature and/or ventilation comply with recommended limits.		48
Apr-17	Working Time	Overtime	Limits on overtime hours worked.	Monitor and limit the number of overtime hours performed.	The factory is monitoring the number of overtime hours performed to ensure that workers do not exceed 80 hours per trimester.	24
Apr-17	Working Time	Regular Hours	Daily break periods.	Review the internal policies regarding break for pregnant women	The factory reviewed the internal policies regarding break for pregnant women. Also all pregnant women were informed of this new policy.	12

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Factory: MGA Haiti S.A
Location: Port-au-Prince
Number of workers: 960
Date of BW registration : Sep-09

Date of last two Better Work assessments: Feb-17 Jun-18

Advisory and Training Services

06-Apr-18	Compliance Assessment Tool Industry Seminar
18-Apr-18	Occupational Safety and Health (OSH)
5-May-18	Bipartite Committee (PICC/LKSB/PC)
10-May-18	Advisory visit to discuss of management system documents with HR and compliance managers. Performed OSH tour to Hazard huntwith compliance manager during advisory visit.
5-Jun-18	Supervisory Skills (SST)
29-Jun-18	Chemical Management System
26-Jul-18	PICC Elections. Discussed the recent assessment report and Improvement Plan with HR manager during advisory visit. Held discussion of PRI template and respective guidance with HR manager during advisory visit.
19-Sep-18	Sexual Harassment Awareness and Prevention Supervisors
19-Sep-18	Sexual Harassment Awareness and Prevention Middle Management
19-Sep-18	Sexual Harassment Awareness and Prevention Workers
21-Sep-18	Discussed the improvement Plan with new Compliance officer. Factory tour. Documentation review on maternity leave payment with new compliance officer during advisory visit.
29-Sep-18	Bipartite Committee (PICC/LKSB/PC)

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMIEDIATION EFFORTS	MONTHS
Assessment June 2018						
Jun-18	Compensation	Paid Leave	Innaccurate payment for maternity leave.	Management is to re-engage and complete registration process with OFATMA for maternity and health in order to secure full benefit of 12 weeks for employees.		4
Jun-18	Compensation	Social Security and Other Benefits	The employer does not pay its contribution to OFATMA for maternity and health insurance.	Management is to re-engage and complete registration process with OFATMA for maternity and health in order to secure full benefit of 12 weeks for employees.		16
Jun-18	Compensation	Social Security and Other Benefits	The employer does not collect and forward workers' contribution to OFATMA for maternity and health insurance.	Management is to re-engage and complete registration process with OFATMA for maternity and health in order to secure full benefit of 12 weeks for employees.	0	16

Jun-18	Contract and Human Resources	Termination	Innaccurate calculations and payment of worker's annual leave.	Ensure proper calculation of unused annual leave based on 1 1/4 day per month accumulation rate.	Management has been advised on proper calculation and is committed to perform the calculations as legally required.	4
Jun-18	Contract and Human Resources	Termination	Innaccurate calculations and payment of worker's bonus payment.	Ensure that workers receive 1/12th of total year to date gross earnings.	Documentation review revealed that workers terminated in July after recent assessment report received 1/12th of total year to date gross earnings.	4
Jun-18	Contract and Human Resources	Dialogue, Discipline and Disputes	Incident of verbal abuse.	Schedule and complete training for managers and supervisors on verbal abuse.	0	4
Jun-18	Occupational Safety and Health	OSH Management Systems	Incomplete OSH management systems.	Appoint new OSH officer following resignation of Officer hired in March. Resume regular meetings of OSH committee with documented minutes for newly elected OSH committee members in July 2018 elections.	A new OSH Officer was hired in August 2018.	4
Jun-18	Occupational Safety and Health	OSH Management Systems	Employer failed to provide the receipt of acknowledgement from OFATMA for the month of November 2017.	Develop adequate document management system that could be available at any time for necessary internal consultation and upon request by appropriate 3rd party.	Management is in the process of designing a more efficient document tracking and storage system.	4
Jun-18	Occupational Safety and Health	OSH Management Systems	OSH policy was not developed in consultation with workers and their representatives.	Discuss OSH policy with newly elected bipartite committee members as soon as reasonable possible for inputs and suggestions. Document in meeting minutes and modify if necessary with top management signature.	0	4
Jun-18	Occupational Safety and Health	Chemicals and Hazardous Substances	Incomplete and inadequate chemical inventory management system.	Update and maintain a complete inventory of all chemicals used in factory premises with respective locations.	Management is in the process of designing a more efficient chemical inventory tracking system.	4
Jun-18	Occupational Safety and Health	Chemicals and Hazardous Substances	Assessors found one unidentified container of machine oil, in the mechanic shop of building 11.	Ensure proper labeling of all containers that store products used in operations.	Management had taken steps to control the transfer of chemicals to unlabeled containers.	4
Jun-18	Occupational Safety and Health	Chemicals and Hazardous Substances	No MSDS were available in the spot cleaning for all chemicals in use.	Conduct assessment of inventory of all chemical products used in the spot cleaning and ensure all MSDS are available.	Management is in the process of producing MSDS in the local language for Airlubes and spot remover and ensure that all future MSDS are available before respective products are used in operations.	4
Jun-18	Occupational Safety and Health	Worker Protection	PPE not available for all workers.	Ensure proper personal protection equipment are available including but not limited to earplugs, and proper masks.	0	4

Jun-18	Occupational Safety and Health	Worker Protection	Inadequate electrical maintenance.	Ensure wires are adequately covered. Ensure electrical panels are not enclosed in flammable materials.		0	4
Jun-18	Occupational Safety and Health	Worker Protection	During factory tour, assessors found one electrical panel, in the mechanic shop, without appropriate safety warnings.	Ensure appropriate safety warnings on electrical panels throughout the factory.	All safety warnings have been posted.		16
Jun-18	Occupational Safety and Health	Working Environment	Temperature exceed Better Work 30 C recommendation.	Explore and adopt potential heat reduction and ventilation enhancement measures.		0	89
Jun-18	Occupational Safety and Health	Working Environment	Inadequate light levels.	Explore and adopt lighting improvement measures accordingly to stay within recommendations.		0	4
Jun-18	Occupational Safety and Health	Welfare Facilities	Capacity of the eating area is insufficient to accommodate all the workers.	Expand the eating area to accomodate all a workers.		0	101
Jun-18	Occupational Safety and Health	Health Services and First Aid	No health checks conducted for workers newly hired.	Arrange systematic medical checks for newly hired workers.		0	16
Jun-18	Occupational Safety and Health	Health Services and First Aid	Annual medical checks not conducted for all workers.	Arrange systematic medical checks for all workers.		0	16
Jun-18	Occupational Safety and Health	Health Services and First Aid	Insufficient onsite medical facilities and staff.	comply with the Haitian Labor Code, have a permanent onsite medical service, with at least 5 nurses and 3 doctors' visits per week.		0	101
Jun-18	Occupational Safety and Health	Health Services and First Aid	First aid box obstructed by sewing tables.	Work with OSH delegates and ensure that first aid boxes are not obstructed.	All first aid boxes remain clear of obstruction.		
Jun-18	Occupational Safety and Health	Health Services and First Aid	Insufficient number of workers trained on first aid.	Provide first aid training for 10 percent of the workforce, once per year.		0	4
Jun-18	Occupational Safety and Health	Emergency Preparedness	Fire escape routes are not clearly marked in packing and cutting area.	Keep escape routes clearly marked for both buildings 11 and 17.		0	16
Jun-18	Occupational Safety and Health	Emergency Preparedness	Electrical panel not properly maintained.	Ensure that electrical panels are not enclosed in flammable material (IE boxes).	None of the electrical panels in building 17 mechanic shop is enclosed in a wooden box.		4
Jun-18	Occupational Safety and Health	Emergency Preparedness	Phones were observed charging in uncovered electrical outlets near flammable chemical such as thinner and blow out in the spot cleaning area of building 17.	Ensure proper storage of chemical away from potential sources of ignition.	All electrical outlets near the spot cleaning area of building 17 have been eliminated.		4

Feb-17	Compensation	Premium Pay	Inaccurate compensation for weekly rest days.	The factory must pay the day of Sunday after a period of 6 working days.	The management mentioned that the adjustment will be made in the next payroll.	16
Feb-17	Compensation	Paid Leave	Inaccurate payment for legally mandated holidays.	Adjust Payroll system to ensure payment for legally mandated holidays is accurate.	The changes have been made in the payroll system and payment for legally mandated holidays is based on worker's average earning.	16
Feb-17	Compensation	Paid Leave	Inaccurate compensation for weekly rest days.	Adjust payroll system to ensure that payment for weekly rest days is accurate.	The changes have been made in the payroll system, payment for weekly rest days is based on workers' average earning.	16
Feb-17	Compensation	Social Security and Other Benefits	The factory has not registered with OFATMA for maternity and health insurance services.	Register with OFATMA for maternity and health insurance services.		16
Feb-17	Compensation	Social Security and Other Benefits	The factory has not registered with OFATMA for maternity and health insurance services.	Register with OFATMA for maternity and health insurance services.		16
Feb-17	Compensation	Social Security and Other Benefits	Employer Contribution to ONA.	Ensure that ONA payment is done on the base salary instead of worker's minimum wages.	The changes are made from minimum salary to base salary.	41
Feb-17	Compensation	Social Security and Other Benefits	Collecting and forwarding worker's contributions for social insurance funds to ONA.	Ensure that ONA payment is done on the base salary instead of worker's minimum wages.	The changes are made from minimum salary to base salary.	41
Feb-17	Contract and Human Resources	Employment Contracts	Specify terms and conditions of employment in written employment contracts.	Review employment contract to ensure compliance with legal requirements such as: hours of work, the nature of the work to be performed, amount of pay and benefits.	The employment contract has been revised with the term and specifications.	16
Feb-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Labeling of chemicals and hazardous substances in the mechanic room.	Label all containers and provide posters on labeling chemicals substances. Incorporate the importance of labeling containers into the training on chemical substances. Monitor the labeling of containers. Have someone in charge for transferring the chemicals	The workers in spot cleaning area were trained. The compliance labelled all chemical products in local language. A daily inspection id one by the compliance officer.	16
Feb-17	Occupational Safety and Health	OSH Management Systems	Mechanisms to ensure cooperation between workers and management on OSH matters.	Ensure that the factory has an active OSH committee which meet at least once a month.	All committee members have been trained. Also the factory started to conduct an occupational safety and health assessment every month.	16
Feb-17	Occupational Safety and Health	Emergency Preparedness	A fire extinguisher was missing in the boiler room and also no proof of regular maintenance was provided.	Increase the frequency of inspections of fire extinguishers in all buildings. Replace missing fire extinguishers. Keep a stock of additional fire extinguishers for use in an emergency	The missing fire extinguisher has been replaced and an inspection sheet is available. Moreover, a stock of additional fire extinguishers is available to be used in case of emergency	89

Feb-17	Occupational Safety and Health	Emergency Preparedness	Several escape routes were obstructed with fabric bundles in the sewing section of building 17.	Ensure that the aisles in the sewing lines remain unobstructed during working hours, including overtime.	The maintenance department has already begun to trace the floor of the factory so that more space can be found for the evacuation lines.	16
Feb-17	Occupational Safety and Health	Health Services and First Aid	Health checks for workers who are exposed to work related hazards.	Provide medical checks to workers who have been exposed to work related hazard twice a year.	The company provided general medical check for the employees of the chemical departement. Future medical checks will be scheduled every 6 months. Paraclinical examinations have started since the month of May.	16
Feb-17	Occupational Safety and Health	Health Services and First Aid	Annual medical checks for workers.	Ensure Annual medical checks is provided to all workers.	Paraclinical examinations have started since the month of May.	16
Feb-17	Occupational Safety and Health	Health Services and First Aid	Onsite medical facilities and staff.The factory has 2 nurses and 2 doctor's visits per week.	Hire additional medical staff, at least 4 nurses and 3 doctor's visit per week.	The factory has a doctor who does 3 visit per week .	101
Feb-17	Occupational Safety and Health	Worker Protection	No appropriate PPE was provided to workers using thinner in the spot cleaning area.	Provide appropriate PPE and conduct training for all workers using chemicals.	The training was done for workers in the spot cleaning and PPE have been provided. In addition workers using chemicals in the mechanic shop has been trained.	16
Feb-17	Occupational Safety and Health	Worker Protection	Several electrical boxes with exposed wires was observed in building 17.	Ensure that electrical wires and equipment are properly installed and maintained.	The factory completed the installation of electrical cord cover.	16
Feb-17	Occupational Safety and Health	Working Environment	The temperatures in Building 17, sewing and pressing section exceed BW recommended limit of 30 C.	Improve the temperature levels in the noted areas.	Temperature in building 17 was observed to be at 28C during factory tour by factory thermometer	89
Feb-17	Occupational Safety and Health	Welfare Facilities	The factory has 13 toilets for men and 19 toilets for women.	Ensure that the factory has at least 37 functioning toilets for women and 14 functioning toilets for men.	Sonapi built 14 new toilets and 7 others are being repaired	101
Feb-17	Occupational Safety and Health	Welfare Facilities	The eating area can only accommodate a small percentage of the workforce.	Ensure that the eating area can accommodate all workers.	The factory is now building another cafeteria. The factory has already build a new cafeteria in front of building 11, he can accommodate all workers during the lunch time, now we have 2 eating area disponible for the workers.	101



Factory: PACIFIC SPORTS HAITI S.A.
Location: Port-au-Prince
Number of workers: 1619
Date of registration: Nov-09
Date of last two Better Work assessments: Aug-18 Jul-17

Advisory and Training Services

25-Apr-18 OSH training and factory tour with use of BW OSH checklist.
 27-Jun-18 Advisory visit to review OSH procedures, payment of weekly rest day and holiday. Factory tour to verify OSH remediation efforts.
 27-Sep-18 Advisory visit to review the improvement plan and follow up on the grievance policy. Then, introduce the new online progress report. Factory tour to review OSH issues.
 6-Apr-18 Compliance Assessment Tool Industry Seminar
 24-Apr-18 Occupational Safety and Health (OSH) Training
 1-Jun-18 Leadership Skills Industry Seminar
 5-Jun-18 Industry Seminar on Supervisory Skills (SST)
 25-May-18 PICC meeting to discuss the implementation of a policy related to grievance mechanism and emergency preparedness.
 27-Jun-18 PICC meeting to discuss the temperature issues and assign someone for the daily check of fire extinguishers in each building.
 26-Jul-18 PICC meeting to discuss the following points: Annual medical checks for workers, Storage of flammable materials and access to emergency exits.
 22-Aug-18 PICC meeting to discuss Better Work last assessment findings
 19-Sep-18 PICC meeting to review the following points: ONA payments and Notice period.

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDIATION EFFORTS	MONTHS
Assessment September 2018						
Sep-18	Compensation	Overtime Wages	Workers are not compensated 50% above the normal wage as a direct result of overtime hours.	Pay workers 50% above the normal wage for all ordinary overtime hours worked		2
Sep-18	Compensation	Social Security and Other Benefits	Worker contribution to ONA not submitted on time	Ensure that workers' contribution are collected and forwarded to ONA on time. Payment should be submitted within the 10 business day of each month for the previous month.	payment are submitted within the 10 business day of each month for the previous month.	2
Sep-18	Compensation	Social Security and Other Benefits	Employer contribution to ONA.	Ensure that employers' contribution are forwarded to ONA on time. Payment should be submitted within the 10 business day of each month for the previous	payment are submitted within the 10 business day of each month for the previous month.	2

Sep-18	Compensation	Social Security and Other Benefits	The factory is not registered with OFATMA for maternity and Health insurance.	Register with OFATMA for maternity and health insurance services.		14
Sep-18	Compensation	Social Security and Other Benefits	Collect and forward workers' contributions to OFATMA	Register with OFATMA. Collect and forward workers' contributions to OFATMA for maternity and health insurance services.		14
Sep-18	Compensation	Termination	The payment for the notice period is based on the minimum wage.	Ensure that The payment for the notice period is calculated on workers' average earnings.	Adjustment has been made in the payroll and the notice period is calculated on workers' average earnings.	2
Sep-18	Occupational Safety and Health	Health Services and First Aid	Insufficient medical staff.	Ensure that the factory has a permanent onsite medical staff, with at least 8 nurses and 3 doctor's visits per week.		41
Sep-18	Occupational Safety and Health	Worker Protection	Workers assigned to the spot cleaning area to do inspection were not using proper PPE.	Provide proper PPE to workers in the spot cleaning		2
Sep-18	Occupational Safety and Health	Worker Protection	Battery terminals in the generator room were missing the insulation cover.	Install the insulation cover and specify who conduct daily weekly checks and include this in the system of daily weekly checks.		2
Sep-18	Occupational Safety and Health	Working Environment	Temperature exceed Better Work recommended limit of 30 C in all sections	Improve the temperature levels in all sections. Then conduct regular measurement of temperature		64
Sep-18	Occupational Safety and Health	Working Environment	Workplace lighting is below BW recommended limit in Sewing, packing and quality sections.	Ensure the lighting is adequate and adapted to worker's needs.	The electrician is in charge for the regular maintenance of the light and the Compliance Staff is in a charge to conduct regular measurement	
Sep-18	Occupational Safety and Health	Chemicals and Hazardous Substances	MSDS were not available for chemical and hazardous substances such as paints, radiator coolant, Max cleaner.	Identify a person responsible for chemical management. Prepare and post MSDS where chemicals are used.		2
Sep-18	Occupational Safety and Health	Emergency Preparedness	One fire extinguisher was obstructed in the stock room during the assessment visit.	Mark all spaces that should not be obstructed in the workplace. Ensure that access to fire extinguishers remain unobstructed in the		47

Sep-18	Occupational Safety and Health	Emergency Preparedness	Escape routes in packing section of building 27 and in the cutting section of building 26 were not clearly marked.	Verify the evacuation plan and mark all the escapes route in the workplace.	Escape routes in packing section of building 27 and in the cutting section of building 26 now are clearly marked	2
Sep-18	Occupational Safety and Health	Emergency Preparedness	Routes were obstructed by production materials in some aisles of building 25 and by heavy lifting support equipment in building 26.	Conduct a root cause analysis. Have someone in charge of verifying and ensuring that the aisles remain unobstructed during working hours, including overtime.		14
Assessment April 2018						
Apr-17	Compensation	Wage Information, Use and Deduction	The payroll is not accurate because the number of overtime hours in the payroll records did not match the attendance records	Ensure that information in the payroll is accurate.		
Apr-17	Compensation	Paid Leave	Payment for legally mandated holidays is based on the minimum wages instead of worker's average earning.	Adjust Payroll system to ensure payment for legally mandated holidays is based on worker's average earning.	Payment for legally mandated holidays is based on worker's average earning.	
Apr-17	Compensation	Social Security and Other Benefits	The employer is not affiliated with OFATMA for maternity and health insurance services (workers' contributions).	Register with OFATMA for maternity and health insurance services.	We are in process to finish with the registration with OFATMA for maternity and health insurance services. we already prepare the list of the workers, sent to OFATMA and now we are waiting OFATMA to come in the company to present the insurance policy to the workers to complete this	
Apr-17	Compensation	Social Security and Other Benefits	The employer is not affiliated with OFATMA for maternity and health insurance services (employer's contributions).	Register with OFATMA for maternity and health insurance services. Collect and forward workers contribution to OFATMA.	We are in process to finish with the registration with OFATMA for maternity and health insurance services. we already prepare the list of the workers, sent to OFATMA and now we are waiting OFATMA to come in the company to present the insurance policy to the workers to collect and forward workers contribution	

Apr-17	Occupational Safety and Health	Emergency Preparedness	In the fabric warehouse of Building 25, access to several fire extinguishers were obstructed by boxes. Near Building 27, access to one fire extinguisher was also obstructed by boxes	Assign someone to do the inspection of the fire extinguishers on a regular basis. Do a root cause analysis to find out why several fire extinguishers are obstructed. Provide training to the workers on firefighting equipment.	The boxes have been removed, also 2 persons were designated to conduct the daily inspection of the fire extinguishers.	
Apr-17	Occupational Safety and Health	Emergency Preparedness	80 percent of the aisles are blocked by trolleys in the fabric warehouse of Building 25.	Do a root cause analysis on why the aisles are blocked by trolleys. Have someone in charge to monitor that the aisles remain free.	We have already another building to store fabrics and other materials there are not aisles blocked by trolleys and fabrics anymore.	
Apr-17	Occupational Safety and Health	Emergency Preparedness	An electrical cabinet in the fabric warehouse of Building 25 was blocked by cardboard boxes, which can be a potential fire hazard.	Identify a place to put the cardboard boxes. Ensure that the electrical cabinet is unobstructed.	we have already clean this area and the electrical cabinet is unobstructed.	
Apr-17	Occupational Safety and Health	Health Services and First Aid	Annual medical checks for workers	Ensure Annual medical checks is provided to all workers.	Now we are at 95% checks to complete the Annual medical checks we ask better work to come and completed this point for us.	
Apr-17	Occupational Safety and Health	Health Services and First Aid	Onsite medical facilities and staff. The factory has 5 nurses and 3 doctor's visits each week.	Hire additional medical staff, at least 8 nurses and 3 doctor's visit per week.	The management is currently recruiting 2 additional nurses.	
Apr-17	Occupational Safety and Health	Working Environment	The temperatures in Building 8, packing, inspection and pressing section exceed BW recommended limit of 30 C. Building 7, Cutting section, exceed BW recommended limit of 30 C. Building 15, Pressing, sewing and Inspection section exceed BW recommended limit of 30 C.	Improve the temperature levels in the noted areas.	we are adding big ventilator and more extractor	
Apr-17	Occupational Safety and Health	Working Environment	Noise levels in the sewing section of building 8 exceed 90 dB.	Identify noise producer source and replace it. Provide PPE to the workers if noise levels can not be reduced.	Identify noise producer source and replace it. Provide PPE to the workers if noise levels can not be reduced.	



Factory: Palm Apparel S.A.
Location: Port-au-Prince
Number of workers: 1578
Date of registration: Nov-09
Date of last two Better Work Jul-17 Sep-18

Advisory and Training Services

20-Sep-18 Training on Sexual Harassment Awareness and Prevention for Supervisors & Middle Management
 20-Sep-18 Training on Sexual Harassment Awareness and Prevention for Supervisors & Middle Management
 5-Sep-18 Advisory visit to review the following points: employment contract, files of terminated workers, OSH management system and compensation. Factory tour to validate the status of OSH issues.
 20-Jul-18 Advisory visit to verify the status of OSH issues.
 20-Jul-18 PICC meeting to discuss on the following points: disciplinary measures, dismissals and production targets.
 29-Jun-18 Training on Chemical Management System
 21-Mar-18 PICC meeting to discuss workplace issues such as payment of legally mandated holidays and OFATMA Maternity and Health insurance.
 2-Feb-18 PICC meeting to Present BW objectives and approaches, role and responsibilities of the committee members. In addition, establish a work plan based on the self-diagnosis

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDATION EFFORTS	MONTHS
Assessment October 2018						
Oct-18	Compensation	Social Security and Other Benefits	Late and inaccurate payment of workers contributions for ONA.	Submit ONA payments on time and calculate this amount based on average earnings instead of the minimum wage.		90
Oct-18	Compensation	Social Security and Other Benefits	Late and inaccurate payment of employer contributions for ONA.	Ensure that workers' contribution are collected and forwarded to ONA on time and calculate this amount based on base salary instead of the		90
Oct-18	Compensation	Social Security and Other Benefits	Payment of employer's contribution to OFATMA for the maternity and health insurance is inaccurate.	Forward 3 percent of workers' base salary to OFATMA for maternity and health insurance.		19
Oct-18	Compensation	Social Security and Other Benefits	Payment of workers' contribution to OFATMA for maternity and health insurance is inaccurate.	Collect and forward 3 percent of workers' base salary to OFATMA for maternity and health insurance.		19
Oct-18	Occupational Safety and Health	Chemicals and Hazardous Substances	Unlabelled containers of oil and water being used in the workplace.	Ensure that all hazardous and chemicals substances used in the workplace are properly		19
Oct-18	Occupational Safety and Health	Chemicals and Hazardous Substances	No MSDSs were posted where chemicals are stored and used.	Prepare and post MSDS where chemicals are used.		19

Oct-18	Occupational Safety and Health	Chemicals and Hazardous Substances	Management did not provide proper protective equipment in the spot cleaning area.	Ensure that all PPE are available in the workplace.		1
Oct-18	Occupational Safety and Health	Worker Protection	Management did not provide proper dust masks for workers in the sewing floor.	Provide dust Mask to workers in the sewing floor.		1
Oct-18	Occupational Safety and Health	Worker Protection	Management did not provided evidences of training performed on the use of personal protective equipment and machines.	Conduct additional training on the wearing of PPEs		1
Oct-18	Occupational Safety and Health	Worker Protection	Electrical panel missing cover in the generator room.	Ensure that all electrical panels are closed and properly maintained.		1
Oct-18	Occupational Safety and Health	Worker Protection	Assessors observed that several electrical boxes are missing hazard sign in floor 3, 4 and 5.	Identify electrical installations requiring warning signs and Post corresponding signs		1
Oct-18	Occupational Safety and Health	Working Environment	Temperature exceed Better Work recommended limit of 30 C in all sections.	Ensure that the temperature does not exceed the recommended limit.		1
Oct-18	Occupational Safety and Health	Working Environment	Workplace lighting is below BW recommended limit in sewing and quality sections of floor 1,2..	Ensure the lighting is adequate and adapted to worker's needs.		19
Oct-18	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets.	Increase the number of toilets.		
Oct-18	Occupational Safety and Health	Health Services and First Aid	The employer did not provide annual medical checks for workers.	Provide annual medical checks for workers.		19
Oct-18	Occupational Safety and Health	Health Services and First Aid	The employer did not provide medical checks for workers within the first three months of hiring.	Provide health checks at not cost for workers within the first three months of hiring.		1
Oct-18	Occupational Safety and Health	Health Services and First Aid	The employer did not provide health checks for workers who are exposed to work-related hazards twice a year.	Provide health checks twice a year at not cost for workers who are exposed to work related hazards		1
Oct-18	Occupational Safety and Health	Health Services and First Aid	Insufficient medical staff	Hire the required medical staff.		1
Oct-18	Occupational Safety and Health	Health Services and First Aid	Products are missing in all fist-aid boxes.	Equip all first aid boxes and define responsibility for refilling them.		19
Oct-18	Occupational Safety and Health	Emergency Preparedness	One fire extiguisher was overcharged another one was not easily accessible.	Ensure that access to fire extinguishers remain unobstructed in the workplace. Specify who conduct daily weekly checks		1
Oct-18	Occupational Safety and Health	Emergency Preparedness	The evacuation plan is not accurate.	Update the evacuation plan.		1
Oct-18	Occupational Safety and Health	Emergency Preparedness	Assessors observed escape routes blocked by boxes of finished goods and other materials in floors 1,2 and 3.	Identify a space to store finished goods and materials. Then assign someone to follow-up on a monthly basis.		1
Oct-18	Working Time	Regular Hours	Working time records are manually reported.	Have an accurate attendance recording system. Use a form to request workers to work		84

Oct-18	Child Labour	Child Labourers	workers files missing ID document with picture.	Improve the recruitment procedure to ensure that reliable documents & techniques are used to verify the age of workers.	1
Assessment August 2017					
Aug-17	Compensation	Premium Pay	Payment for regular hours worked on legally mandated holidays is based on the minimum wages instead of worker's average earning.	Adjust Payroll system to ensure payment for regular hours worked on legally mandated holidays is based on worker's average earning.	13
Aug-17	Compensation	Paid Leave	Payment for legally mandated holidays is based on the minimum wages instead of worker's average earning.	Ensure payment for legally mandated holidays is based on worker's average earning.	13
Aug-17	Compensation	Social Security and Other Benefits	Employer Contribution to ONA. ONA contributions is based on the minimum wage instead of the base salary.	Revised payroll procedure to ensure that ONA payment is based on the basic salary instead of worker's minimum.	84
Aug-17	Compensation	Social Security and Other Benefits	Collecting and forwarding worker's contributions for social insurance funds to ONA.	Ensure that ONA payment is based on the basic salary instead of worker's average.	84
Aug-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Labeling of chemicals and hazardous substances in the mechanic room	Label all containers and provide posters on labeling chemicals substances - Incorporate the importance of labeling containers into the training on chemical substances - Monitor the labeling of containers.	13
Aug-17	Occupational Safety and Health	OSH Management Systems	The temperatures in Building 2, 3 and 4, packing, sewing and inspection section exceed BW recommended limit of 30 C.	Improve the temperature levels in the noted areas.	13
Aug-17	Occupational Safety and Health	Welfare Facilities	The factory has 20 toilets for men and 42 toilets for women. According to the Haitian law, the factory should have 21 functioning toilets for men 65 functioning toilets for women.	Ensure that the factory has at least 21 functioning toilets for men 65 functioning toilets for women	13
Aug-17	Occupational Safety and Health	Welfare Facilities	The eating area located at Thor can only accommodate a small percentage of the workforce	Ensure that the eating area can accommodate all workers.	13
Aug-17	Occupational Safety and Health	Health Services and First Aid	Onsite medical facilities and staff. The factory has 4 nurses and 3 doctor's visits per week.	Hire additional medical staff, at least 7 nurses and 3 doctor's visit per week.	13
Aug-17	Occupational Safety and Health	Emergency Preparedness	Several escape routes were obstructed by boxes of finished goods on floors 2 and 5.	-Do a root cause analysis -Conduct awareness training for all workers -Have someone in charge of the daily inspection to ensure that the aisles remain unobstructed during working hours, including overtime.	78

Aug-17	Compensation	Overtime	No Authorization from the Departement of Labour for overtime	Requested and obtained authorization from MAST before working overtime.	18
Aug-17	Compensation	Social Security and Other Benefits	Employer contribution to OFATMA for maternity and health insurance. The factory collect and forward 2 percent of the worker's	Collect and forward 3 percent of worker's average earnings to OFATMA for maternity and health insurance.	13
Aug-17	Compensation	Social Security and Other Benefits	Collect and forward worker's contribution to OFATMA for maternity and health insurance.	Ensure that 3 percent of worker's average earnings is collected and forwarded to OFATMA for maternity and health insurance.	13



Factory: Premium Apparel S.A.
Location: Port-au-Prince
Number of workers: 1998
Date of BW registration: Oct-09
Date of last two Better Work assessments: Oct-16 Aug-17

Advisory and Training Services

09-May-18	Advisory visit to verify the files of terminated workers. Meeting with management to review improvement actions. Factory tour to verify OSH remediation. Union
20-Mar-18	Advisory visit to review the report on dismissal with management. Meeting with HR manager to update the improvement plan. Factory tour to verify the status of OSH issues. Meeting with the union president.
20-Oct-17	PICC Meeting to discuss on the Grievance mechanism in relation to the self-diagnostic process.
01-Feb-18	Overview of key functionalities of the supplier portal with the new HR manager. Improvement plan exercises and coaching on the preparation of the progress report with HR manager.
16-Nov-17	Meeting with plant manager, operations manager and HR Manager to review the last assessment report and discuss of the remediation actions and deadlines.
26-Jun-18	Meeting with management and pregnant women to inform workers about their rights and responsibilities. Factory tour to verify the status of OSH issues. Union interviews.
30-Nov-17	Industrial Relations Training
15-Nov-17	Chemicals management training

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDATION EFFORTS	MONTHS
Assessment August 2017						
Aug-17	Compensation	Social Security and Other Benefits	Late and inaccurate payment of employer contributions for ONA.	Submit ONA payments on time and calculate this amount based on average earnings instead of the minimum wage.		25
Aug-17	Compensation	Social Security and Other Benefits	Late and inaccurate payment of workers contributions for ONA.	Ensure that workers' contribution are collected and forwarded to ONA on time and calculate this amount based on base salary instead of the minimum wage.		25
Aug-17	Compensation	Social Security and Other Benefits	No evidence of reigistartion for work related accident insurance available.	Ensure employer contribution to OFATMA for work-related accident insurance is 3 percent of workers' base salary.		25
Aug-17	Compensation	Social Security and Other Benefits	Payment of employer's contribution for the OFATMA for the maternity and health insurance is inaccurate.	Forward 3 percent of workers' base salary to OFATMA for maternity and health insurance.		25

Aug-17	Compensation	Social Security and Other Benefits	Payment of workers' contribution for the OFATMA for the maternity and health insurance is inaccurate.	Collect and forward 3 percent of workers' base salary to OFATMA for maternity and health insurance.		25
Aug-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Inadequate storage of chemicals and hazardous substances.	Define a storage place for each chemical. Ensure that the chemicals are properly labelled. Ensure the written instructions on MSDS are available in the storage place.	The chemical concerned, Blow out, has been removed from the supervisor's room.	19
Aug-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Missing chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Have someone in charge for collecting MSDS when new chemicals are used. Posting the MSDS in appropriate places. Conduct regular checks about the MSDS.		19
Aug-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Missing washing facilities or cleansing materials in the event of chemical exposure.	Provide adequate washing facilities and cleansing materials in the event of exposure to hazardous chemicals.	The missing water bottles have been replaced.	25
Aug-17	Occupational Safety and Health	Worker Protection	Workers using chemicals without appropriate mask.	Provide all necessary personal protective clothing and equipment. Conduct training for all workers. Prevent and monitor workers exposition to chemicals.		
Aug-17	Occupational Safety and Health	Working Environment	The temperature level exceed BW recommended limit of 30 C.	Improve the temperature levels in the noted areas.		29
Aug-17	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets.	Comply with the required number of toilets as per the law.		16
Aug-17	Occupational Safety and Health	Health Services and First Aid	Medical checks are not systematically provided for workers upon hiring.	Ensure medical checks are provided to new workers within the first first three months of hiring.	The factory has started to provide systematic health checks to new workers within the first first three months of hiring.	83
Aug-17	Occupational Safety and Health	Health Services and First Aid	Annual medical checks not systematically provided for workers.	Ensure annual medical checks are provided to all workers.	The factory has started to provide annual medical checks to all workers.	83

Aug-17	Occupational Safety and Health	Health Services and First Aid	insufficient medical staff.	Hire additional medical staff, at least 8 nurses and 3 doctor's visit per week.		83
Aug-17	Occupational Safety and Health	Emergency Preparedness	Firefighting equipment not properly maintained.	Ensure that the workplace has adequate fire-fighting equipment. Assign someone to monitor firefighting equipments. Keep an inspection record.	An OSH officer has been assigned to monitor firefighting equipments.	16
Aug-17	Occupational Safety and Health	Emergency Preparedness	Escape routes blocked by boxes of finished goods and other materials.	Conduct a root cause analysis. Have someone in charge of verifying and ensuring that the aisles in the sewing lines remain unobstructed during working hours, including overtime.		35
Aug-17	Occupational Safety and Health	Emergency Preparedness	Electrical box obstructed by flammable materials such as fabric cartons in the workplace.	Ensure that flammable materials are safely stored.	Checklist has been updated to ensure that electrical boxes remain unobstructed.	25
Aug-17	Working Time	Regular Hours	Regular daily and/or weekly working hours exceed the legal limit.	Ensure regular daily and weekly working hours do not exceed the legal limit.		16
Aug-17	Working Time	Regular Hours	No authorization from the Department of Labour before working at night.	Obtain authorization from the Department of Labour before working at night.	Based on the new law it is no longer a compliance point.	16
Aug-17	Working Time	Overtime	The factory exceeded the legal limits on overtime hours worked in the packing section.	Respect the legal overtime limit.	Based on the new law it is no longer a compliance point.	16
Aug-17	Working Time	Overtime	No authorization for performing overtime was provided by management during the time of the assessment.	Request authorization of MAST to perform overtime work.	Based on the new law it is no longer a compliance point.	16
Aug-17	Working Time	Overtime	Management was unable to share any form of consent from the workers to perform overtime.	Ensure that overtime work is voluntary.		16

Oct-16	Compensation	Paid Leave	Workers are not compensated for their breastfeeding breaks.	Ensure that all nursing women benefit from the breastfeeding break as required by the law.	There is a new policy in place so that a report of nursing woman is issued to the department of accounting to ensure that all nursing women benefit from the breastfeeding break as required by the law.	
Oct-16	Compensation	Social Security and Other Benefits	The factory is late for ONA payment	Ensure on-time payment of ONA and pay ONA on basic earnings instead of minimum wage		
Oct-16	Compensation	Social Security and Other Benefits	The amounts collected from workers for ONA is not forwarded on time.	Ensure that workers' contribution are collected and forwarded to ONA.		
Oct-16	Compensation	Social Security and Other Benefits	Inaccurate payment to OFATMA for the maternity and health insurance.	The factory registered with the new maternity and health insurance. Yet, 3 percent of workers' basic salary need to be forwarded to OFATMA for maternity and health insurance.		
Oct-16	Occupational Safety and Health	Chemicals and Hazardous Substances	Unlabeled containers of oil being used in the workplace	Ensure that all hazardous and chemicals substances used in the workplace are properly labeled.	All containers have been labeled.	
Oct-16	Occupational Safety and Health	Chemicals and Hazardous Substances	Insufficient trainings on chemical usage and personal protective equipment.	Reinforce training for workers who work with chemicals and hazardous substances.		
Oct-16	Occupational Safety and Health	Chemicals and Hazardous Substances	No adequate washing facility in the event of exposure to chemicals and hazardous materials.	Provide adequate washing facilities and cleansing materials in the event of exposure to hazardous substances.	Eyewash solution has been replaced.	
Oct-16	Occupational Safety and Health	Worker Protection	Unsafe electrical installation near the generator	Ensure that all electrical wires, switches and plugs are properly installed, grounded, and maintained	The panel has been purchased and the accessories are available.	
Oct-16	Occupational Safety and Health	Working Environment	Workplace temperature and/or ventilation.	Ensure that the temperature does not exceed 30 degree in all sections.	The factory added new exhaust fans.	
Oct-16	Occupational Safety and Health	Welfare Facilities	Eating area is insufficient to accommodate all the workers.	Increase the eating area of the second building	Management has added another eating space in the second building to address this issue.	

Oct-16	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets	Increase the number of toilets in the workplace	Seven additional toilets for men have been added in one building.	
Oct-16	Occupational Safety and Health	Health Services and First Aid	No medical checks have been provided to workers within the first three months of hiring.	Provide medical checks for workers upon hiring	The factory is currently adjusting the clinic to ensure that the physician can do the medical checks.	
Oct-16	Occupational Safety and Health	Health Services and First Aid	Health checks for workers who are exposed to work-related hazards.	Provide free medical checks to workers who have been exposed to work-related hazards.	The factory is currently making adjustments to the clinic to ensure that the on site physicians can conduct medical checks for the workers.	
Oct-16	Occupational Safety and Health	Health Services and First Aid	Annual medical checks are not systematically arranged for all workers.	Ensure that all workers receive annual medical checks.	The factory is currently adjusting the clinic to ensure that the physician can do the medical checks.	
Oct-16	Occupational Safety and Health	Health Services and First Aid	Insufficient onsite medical staff	Ensure that the number of nurses is compliant with the legal requirement	The factory has hired additional medical staff and currently has 4 on site nurses, 2 permanent doctors and another visiting doctor who is available once a week.	
Oct-16	Occupational Safety and Health	Emergency Preparedness	Several aisles were found obstructed by boxes and machinery	Ensure that all emergency exits are accessible, unobstructed and unlocked during working hours, including overtime.	The compliance team is currently working on a new procedure.	
Oct-16	Occupational Safety and Health	Emergency Preparedness	Cellular phones were found being charged all over the workplace and also near containers of chemical K-M7, a highly flammable substance.	Ensure that all sources of ignition are appropriately safeguarded.	Charging station for mobile phones have been added in the personal effects area outside the workplace.	



Factory: Quality Sewing Manufacturing S.A
Location: Port-au-Prince
Number of workers: 418
Date of registration: Oct-09
Date of last two Bette Apr-16 Jun-15

Advisory and Training Activities

6-Oct-18 Occupational safety and Health training
 27-Sep-18 Meeting with management on the Improvement plan and the Progress report- General manager. Discussion on factory general updates.
 27-Sep-18 PICC meeting on the Introduction of the new trade union committee. OSH tour with PICC members to validate remediation efforts.
 29-Jun-18 Industry Seminar on Chemical Management System
 6-Jun-18 Meeting with management on the Improvement plan and remediation efforts. Review of the Compensation and OSH management system document. Factory tour to valid the progress.

 6-Jun-18 PICC meeting on improvement needed and related action plan regarding working environment.
 26-Apr-18 Meeting with management on the Improvement plan and remediation efforts. Review of the Management system document. Factory tour to valid the progress.
 26-Apr-18 Meeting with PICC members on the training plan and on the strategies to give more visibility to the PICC committee.

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDATION EFFORTS	MONTHS
Assessment September 2018						
Sep-18	Compensation	Overtime Wages	Unpaid overtime for workers working on an incentive scheme.	Report overtime worked on the payroll and pay it adequately.		82
Sep-18	Compensation	Wage Information, Use and Deduction	Discrepancies found between the payroll and the worker's pay slip.	Record all deduction on the payroll.		83
Sep-18	Compensation	Paid Leave	Calculation of average earnings were not based on average daily earnings during the previous 3 months of work.	Ensure that the leaves are paid based on average earnings.		84
Sep-18	Compensation	Social Security and Other Benefits	ONA late payment.	Pay ONA within the first 10 working days of each month for the previous month.		85
Sep-18	Compensation	Social Security and Other Benefits	ONA late payment.	Pay ONA within the first 10 working days of each month for the previous month.		86
Sep-18	Compensation	Social Security and Other Benefits	Late payment for OFATMA for work related accidents.	Pay OFATMA contributions for work-related accident insurance in the the delay fixed by the institution.		87

Sep-18	Compensation	Social Security and Other Benefits	The employer only pays 2 per cent of workers' minimum wage instead of 3 per cent of workers' basic salary to OFATMA for maternity and health insurance.	Collect and forward only 3 per cent of the workers' basic salary to OFATMA for maternity and health insurance.		91
Sep-18	Compensation	Social Security and Other Benefits	The factory collects and forwards only 2 per cent of the worker's minimum salary instead of paying 3 per cent of their basic salary.	#REF!		92
Sep-18	Contract and Human Resources	Employment Contracts	Apprentice contracts are not approved by the Office of Manpower.	Get the approval form the Office of Manpower before operating apprentice contracts.		93
Sep-18	Occupational Safety and Health	OSH Management Systems	No self OSH assessment reports for the last 12 months.	Conduct self OSH assement on a regular basis.		94
Sep-18	Occupational Safety and Health	OSH Management Systems	The employer has not developed any mechanism to ensure cooperation on OSH matters.	Conduct regular bipartite meeting on OSH matters.		95
Sep-18	Occupational Safety and Health	OSH Management Systems	OSH policy is not signed by top management and has not been developed in consultation with workers and their representatives	Sign and update the policy in consultation with workers representatives.		96
Sep-18	Occupational Safety and Health	Chemicals and Hazardous Substances	No inventory for chemicals and hazardous substances used in the workplace.	Kept and updated inventory for all the chemicals and hazardous substances used in the workplace.		97
Sep-18	Occupational Safety and Health	Chemicals and Hazardous Substances	One unidentified container of thinner in the mechanic workshop.	Identify all containers used in the workplace.	0	98
Sep-18	Occupational Safety and Health	Chemicals and Hazardous Substances	Chemicals were not properly stored.	Store the chemicals in an adequate location.		99
Sep-18	Occupational Safety and Health	Chemicals and Hazardous Substances	No MSDS were available for Thinner and Degreaser in the electronic shop.	Ensure that MSDS are available for all chemical used in the workplace.		100
Sep-18	Occupational Safety and Health	Chemicals and Hazardous Substances	No eye washing facilities in the electronic workshop where chemicals are used.	Install an eye washing facility were chemical and hazardous substances are used.		101
Sep-18	Occupational Safety and Health	Worker Protection	Proper gloves and goggles for workers in the mechanics' shop were not provided.	Provide the necessary personal protective equipment to workers.		102
Sep-18	Occupational Safety and Health	Worker Protection	Several workers in the Main Building were not using the safety guards installed on their machines.	Train the workers on the use of use personal protective equipment and machines.		103

Sep-18	Occupational Safety and Health	Worker Protection	Standing workers in inspection section were not provided with foot rests or shock absorbing mats. Chairs provided to workers were missing back rest.	Provide foot rests or shock absorbing mats to standing workers. Ensure that all chairs have a back rest.	The factory provided shock absorbing mats to the standing workers.	104
Sep-18	Occupational Safety and Health	Worker Protection	Sewing machines in the main building were missing finger guards, eye guards and pulley guards.	Equipped all the sewing machines with necessary guards.		105
Sep-18	Occupational Safety and Health	Worker Protection	Electrical boxes with exposed wires in the main building. Electrical panels obstructed.	Maintain the wiring and cable system. Properly cover all the electrical panels.		106
Sep-18	Occupational Safety and Health	Worker Protection	Electrical panels that were missing hazard signs.	Post the hazard signs on the electrical panels.		107
Sep-18	Occupational Safety and Health	Working Environment	Workplace temperatures is unacceptable in Sewing, Pressing, Quality, Packing and Cutting sections.	Ensure that the temperature level is aligned with the recommended 30 C.	The factory has installed two new exhausts.	108
Sep-18	Occupational Safety and Health	Working Environment	The level of lighting in the workplace is unacceptable in Sewing, Pressing, Quality, Packing and Cutting sections.	Improve the light levels to the recommended limits.	The factory installed new lights bulbs in the sewing lines.	109
Sep-18	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets.	Ensure to have the appropriate number of toilet according to the workforce.		110
Sep-18	Occupational Safety and Health	Welfare Facilities	Soap was not available in the men's toilets.	Ensure that soap is available in the men's restroom.	The maintenance team is in charge of advising management whenever soap or paper is missing in the toilet.	111
Sep-18	Occupational Safety and Health	Welfare Facilities	The factory has an eating area that can only accommodate 30 per cent of workers .	Ensure that the eating area can accommodate all the workforce.	The factory has extended the eating area and provide more benches.	112
Sep-18	Occupational Safety and Health	Health Services and First Aid	No health check within the first three months of hiring.	Arrange free health checks for workers within the first three months of hiring.		113
Sep-18	Occupational Safety and Health	Health Services and First Aid	No free health check to workers exposed to work-related hazards.	Arrange free health checks to workers exposed to work-related hazards.		114
Sep-18	Occupational Safety and Health	Health Services and First Aid	No annual health check provided to workers.	Arrange free annual health checks for workers.		115
Sep-18	Occupational Safety and Health	Health Services and First Aid	insufficient number of medical staff.	Hire a permanent medical staff with 8 nurses and 3 doctor's visits per week.		116
Sep-18	Occupational Safety and Health	Health Services and First Aid	Expired product found in the first aid box.	Remove the expired products from the first aid box. Ensure that they are adequately equipped.	The expired product was removed during the assessment. The first aid maintenance is under the responsibility of the nurse who does a check on a regular basis.	117

Sep-18	Occupational Safety and Health	Health Services and First Aid	Insufficient number of workers train in first aid.	Train an adequate number of the workforce in first aid.		118
Sep-18	Occupational Safety and Health	Emergency Preparedness	No fire alarm system was observed in the cutting building.	Install a fire alarm in the cutting building.		119
Sep-18	Occupational Safety and Health	Emergency Preparedness	Fire equipment not properly maintained.	Install a fire extinguisher near the mechanical workshop. Identify all the fire extinguishers.	The factory installed a fire extinguisher in the mechanical workshop.	120
Sep-18	Occupational Safety and Health	Emergency Preparedness	Insufficient number of workers train in fire fighting equipment aid.	Train an adequate number of workers in fire-fighting equipment.		121
Sep-18	Occupational Safety and Health	Emergency Preparedness	Evacuation plan inaccurate for the main building. Evacuation plan is not available in the cutting building.	Post an evacuation plan in the cutting department. Update the evacuation plan displayed in the main building.		122
Sep-18	Occupational Safety and Health	Emergency Preparedness	One fire drill conducted per year.	Conduct one drill every 6 months.		123
Sep-18	Working Time	Regular Hours	Pregnant workers are not allowed to take two extra breaks.	Provide additional breaks to pregnant women.		124
Sep-18	Working Time	Regular Hours	Inaccuracy of the attendance records.	Invest in a reliable punching system.		125
Sep-18	Working Time	Regular Hours	Working hours are not posted in the workplace.	Post factory's working hours inside the workplace.		126
Assessment September 2017						
Apr-17	Freedom of Association and Collective Bargaining	Interference and Discrimination		Reinstate terminated workers.		9
Apr-17	Freedom of Association and Collective Bargaining	Interference and Discrimination	Termination of union leaders. Management interference in union activities	Plan regular meeting with union members. Establish a Memorandum of understanding with the trade unions.	The factory participated to an In a training on Industrial Relation on December 2017.	9
Apr-17	Compensation	Wage Information, Use and Deduction	Discrepancies found between the attendance and the payroll records reviewed for the last 3 months.	Keep one accurate payroll records that reflect the exact working hours.	0	9
Apr-17	Occupational Safety and Health	Welfare Facilities	Water test stated that water was not safe.	Provide safe water to workers.	The factory performed monthly an internal test for the water. They sent new sample to their usual laboratory. The test revealed that the water was safe	9
Apr-17	Occupational Safety and Health	Welfare Facilities	The eating area that can only accommodate 25 percent of its workforce at once.	Provide an eating area that can accommodate all the workers	The factory has expanded the eating area. The factory is in process to buy benches to arrange the space.	81
Apr-17	Occupational Safety and Health	Health Services and First Aid	No medical checks were arranged for newly hired workers within the first three months of employment.	Arrange a medical check for newly hired workers within the first three months of employment.		55

Apr-17	Occupational Safety and Health	Health Services and First Aid	Annual medical checks were not provided to all workers in the last 12 months.	Arrange one medical check for all workers.		53
Apr-17	Occupational Safety and Health	Health Services and First Aid	Insufficient number of medical staff.	Comply with the Labor Code regarding the onsite medical staff.		81
Apr-17	Occupational Safety and Health	Health Services and First Aid	Empty first aid box.	Keep the First Aid Boxes properly maintained and equipped. Ensure to have a sufficient number of First Aid Boxes within the plant.	The factory bought products for the floor's first aid box.	53
Apr-17	Compensation	Paid Leave	Payments for non-working holidays are based on the minimum wage.	Pay Inon working holidays on average earnings.		81
Apr-17	Compensation	Paid Leave	Payments for weekly rest days are based on the minimum wage.	Pay the weekly rest day on average earnings.		81
Apr-17	Compensation	Paid Leave	The payments for sick leaves are based on the minimum wage.	Pay sick leave on average earnings.	After the assessment visit, the factory corrected the sick leave payment and started to pay it based on average earnings. However, since January 2018, the factory refused pay to the sick leave stating that they registered for OFATMA health and maternity insurance.	81
Apr-17	Compensation	Social Security and Other Benefits	The factory calculates ONA contributions based on the minimum wage	Pay ONA contributions on base salary.		9
Apr-17	Compensation	Social Security and Other Benefits	Late ONA payment	Pay ONA contributions on base salary.		9
Apr-17	Occupational Safety and Health	Emergency Preparedness	No fire alarm system was observed in the second building.	Install a fire alarm system in the second building.		23
Apr-17	Occupational Safety and Health	Emergency Preparedness	Unidentified fire extinguishers in the Sewing section. No fire extinguisher in the Stock Trim room, the mechanic shop and on the mezzanine floor.	Provide fire extinguisher near stock trim room, mechanic shop and the mezzanine floor.	The 4 unidentified fire extinguishers are now identified. The ones in the cutting section have identified also.	23
Apr-17	Occupational Safety and Health	Emergency Preparedness	No evacuation plans were posted in the second building (Cutting section).	Post an evacuation Plan in the second building.		41
Apr-17	Occupational Safety and Health	Emergency Preparedness	The last fire drill was conducted in July 2015.	Conduct two fire drill a year.	0	65
Apr-17	Working Time	Regular Hours	Inaccurate attendance records.	Ensure that attendance records are accurate and reflect the exact working time.	Management said that they are actively looking for an effective punching system.	9

Apr-17	Working Time	Overtime	Excessive overtime for workers in sewing section, and in the Mechanic Shop.	Ensure that overtime hours do not exceed the legal limits.		65
Apr-17	Compensation	Social Security and Other Benefits	The employers' contribution to OFATMA for work-related accident insurance is based on the minimum wage instead of the basic salary.	Pay OFATMA contributions for work-related accident insurance on basic salary.		9
Apr-17	Compensation	Social Security and Other Benefits	The employer only pays 2 percent of workers' minimum wage instead of 3 percent of workers' basic salary to OFATMA.	Pay 3 percent of workers' basic salary to OFATMA.OFATMA for maternity and health insurance.		9
Apr-17	Compensation	Social Security and Other Benefits	The employer only pays 2 percent of workers' minimum wage instead of 3 percent of workers' basic salary to OFATMA.	Pay 3 percent of workers' basic salary to OFATMA.OFATMA for maternity and health insurance.		9
Apr-17	Contract and Human Resources	Employment Contracts	Apprentice contracts provisions related to compensation and duration of training time, are less favorable than those stated in the internal rules.	Comply with the labor Code and factory's internal rules regarding the apprentice contracts.	The factory is in the process to change the apprentice contract accordingly to the legal requirements.	9
Apr-17	Occupational Safety and Health	OSH Management Systems	No evidence of management conducting assessments of general occupational safety and health issues in the workplace.	Regularly assess the OSH points. Elaborate an assessment template. Keep records of assessments performed on a regular basis.	The bipartite committee is in charge of performing OSH assessment on a weekly basis and to report the issues to management.	81
Apr-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Inventory of chemicals used such as thinner were unavailable during the assessment visit.	Ensure that all chemicals used in the workplace are listed on the inventory.	An inventory of all chemicals bought and used is available.	81
Apr-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Unidentified containers with thinner and oil in the Mechanical Workshop.	Ensure to label any container used in the workplace.	Thinner is no longer used. Management informed the mechanic to label all containers and that chemical such as thinner is forbidden in the factory.	81
Apr-17	Occupational Safety and Health	Chemicals and Hazardous Substances	No MSDS' were posted for thinner in the Mechanical Workshop.	Post MSDS' were workers are using chemicals and dangerous substances.	The factory is not using thinner. MSDS is posted for all chemicals used in the mechanical shop.	81
Apr-17	Occupational Safety and Health	Worker Protection	Several workers in the Main Building were not using the safety guards installed on their machines.	Train workers on the use of personal protective equipment.	0	81
Apr-17	Occupational Safety and Health	Worker Protection	30 percent of the sewing machines were missing safety guards.	Install all missing machines guards.	The factory bought finger guards and is in the process of installing them were needed. The order was made for the eye guards.	81

Apr-17	Occupational Safety and Health	Overtime	Prior authorization was not obtained from the Department of Labor before working overtime.	Obtain authorization from the Department of Labor before working overtime.		71
Apr-17	Occupational Safety and Health	Worker Protection	The electrical distribution boards were not well maintained.	Ensure the electrical maintenance is regularly done.	The distribution boards are properly fixed to the wall.	9
Apr-17	Occupational Safety and Health	Working Environment	The temperature level exceeds the recommended 30 C in sewing , quality and packing section.	Install more exhaust fan throughout the workplace.	The factory replaced the defective fans and add four more fans throughout the floor.	81
Apr-17	Occupational Safety and Health	Working Environment	The light levels are unacceptable in packing, sewing, inspection sections.	Ensure the light levels are appropriate for sewing, packing, inspection and trimming sections.	The factory replaced the defective lights.	20
Apr-17	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets.	Comply with the Labor Code regarding the number of toilets		81
Apr-17	Working Time	Overtime	No authorization form MAST prior working overtime.	Obtain authorization from the Department of Labor before working overtime.		90



Factory: S&H Global S.A
Location: Caracol
Number of workers: 8483
Date of registration: Jun-12
Date of last two Better Work assessments: Jul-17 Jul-16

Advisory and Training Activities

7-Sep-18	Sexual Harassment Awareness and Prevention Training for Middle Management
7-Sep-18	Sexual Harassment Awareness and Prevention Training for Workers
7-Sep-18	Sexual Harassment Awareness and Prevention Training for Supervisors
6-Sep-18	Industry Seminar on Risk Management & Control
3-Sep-18	Industry Seminar on Supervisory Skills Training (SST)
1-Sep-18	Workers Rights & Responsibilities Training
30-Aug-18	Bipartite Committee (PICC/LKSB/PC) Training
29-Aug-18	Workshop on root cause analysis with PICC members. Discussion on the Introduction of a new trade union with trade union committees. Closing meeting with Compliance and Human Resources Managers.
24-Aug-18	Meeting with Compliance Managers on Improvement plan updates and progress report.Meeting with trade union and management on their Working time agreement.
22-May-18	Visit of the new premise module 7. Meeting with trade union and management on inter union conflict. Review of document review to validate follow ups Human Resources manager
22-May-18	Workshop with the PICC committee on self diagnosed issues. Meeting with the management on the working time changes.OSH Factory Tour to validate OSH remediations.
14-May-18	Industry Seminar on Chemical Management System
8-May-18	Industry Seminar on Supervisory Skills Training (SST)

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDATION EFFORTS	MONTHS
Assessment June 2018						
Jun-18	Discrimination	Gender	Module 7 failed to follow the factory zero tolerance policy relating to Sexual Harassment misconduct.	Ensure that all module are respecting the zero tolerance. Ensure that all employees working in the HR department and the supervisory lines of each module receive the HR training. Review the zero tolerance policy and consult workers representatives on issues related to Sexual Harassment.	The employees that were involved in this incident have been rightly terminated. An investigation was carried regarding these workers and they were punished as they had violated the company's Zero Tolerance Policy.	3

Jun-18	Occupational Safety and Health	Worker Protection	Obstructed electrical panel in module 1. Exposed wires and electrical installations enclosed in a wooden box in module 4.	Ensure that electrical installation are adequately safeguarded; Replace the wooden box by an adequate material/cover.	All exposed wires were covered and well maintained so that they did not obstruct or cause any danger in the workplace. Training was carried to supervisors and the FCO to routinely check all environment safety and specially fire safety equipment.	
Jun-18	Occupational Safety and Health	Worker Protection	No exit signs posted in the maintenance building near warehouse 2.	Perform regular internal assessment on OSH compliance points. Train the maintenance team on OSH compliance points. Include the monitoring of exits in the emergency preparedness procedures.	The factory replaced and installed the emergency lights in the 2 exits. All exit signs have been clearly marked and arrows have been repainted in order to help workers visual understanding of the exits.	9
Jun-18	Occupational Safety and Health	Working Environment	The workplace temperature exceed the recommended 30 C.	Better Work recommends a maximum of 30 C. Set internal inspections on a regular basis	Mechanics checks are performed on all cooling systems monthly. Daily control for some critical areas such as C-TPAT area and spot cleaning area	9
Jun-18	Occupational Safety and Health	Working Environment	The noise level exceed the recommended 90 db in the sewing section, in Module 3.	Better Work recommends a maximum of 90 dB.	Management has reduced the volume of the music inside the work place and the IT team has set a limit to the music volume in all modules. Workers who work in the pressing section are always provided with ear plugs.	33
Jun-18	Occupational Safety and Health	Working Environment	The level of lighting in the workplace is unacceptable in sewing, cutting and quality sections.	Better Work recommends a minimum of 300 Lux for this section: Pressing section Better Work recommends a minimum of 500 Lux for these sections: Sewing, cutting and packing sections Better Work recommends a minimum of 750 Lux for these sections: Trimming and inspection sections	S&H Global only uses LED light bulbs, and all light bulbs were installed again in order to achieve the recommended Lux.	3
Jun-18	Occupational Safety and Health	Welfare Facilities	Paper and soap were not available in the men's bathroom of Module 3.	Provide soap in the men's bathroom.	Soap and paper were immediately restocked in the toilets, and this issue was corrected during the assessment. Management trained all security guards and cleaning staff to check for toilet paper and soap hourly.	3

Jun-18	Occupational Safety and Health	Health Services and First Aid	The factory does not provide health checks for all workers within the first three months of employment.	Ensure that newly workers are having their health checks done within the first three months of hiring.	Medical checks for workers have been duly done. Main office has spoken with factory 7's administrator to perform medical check-ups as soon as workers are hired.	
Jun-18	Occupational Safety and Health	Health Services and First Aid	Interviewed workers stated that the factory does not provide workers with free annual health checks.	Facilitate annual medical check for workers before the end of 2018; Ensure that an agenda is set up internally to perform medical check-ups; Properly document internal check ups performed.	An agreement have been made with OFATMA to perform the medical checks for the workers.	3
Jun-18	Occupational Safety and Health	Health Services and First Aid	Insufficient number of onsite medical staff.	Have a adequate number of medical staff.	All the nurses' position have been relocated back again into the factory's medical field.	9
Jun-18	Occupational Safety and Health	Health Services and First Aid	One bottle of oxygenated water expired in the First aid box located in the washing area.	Ensure that the first aid boxes are adequately equipped.	The expired bottle of oxygenated water was immediately removed and replaced with a new one. The Compliance department trained all the nurses inside the factories to check for any missing drugs or expired chemicals that needed.	9
Jun-18	Occupational Safety and Health	Health Services and First Aid	Less than 10 percent of the workforce is trained in first aid administration.	Ensure that 10% of the workforce is train on first aid; - Fortify training methods internally.	The training was carried out in September 2018. In order to prevent this issue from re-occurring, now trainings will be carried out internally every 3 months.	3
Jun-18	Occupational Safety and Health	Emergency Preparedness	No smoke detector was installed in the fabric warehouse of module 5.	Install a smoke detector in the module. Ensure that maintenance is doing on a regular basis for fire-fighting equipment. Train factory compliance officers on firefighting equipment.	Smoke detectors have been installed accordingly in the mentioned areas. The FCOs are responsible to conduct monthly check-ups in order to see if all smoke detectors are working correctly.	9
Jun-18	Occupational Safety and Health	Emergency Preparedness	Several fire extinguishers were obstructed by boxes, fan or other materials and one fire extinguisher found with the pressure gauge broken.	Ensure to have adequate procedures in place to monitor the handling of fire extinguisher; - Inspect on a regular basis fire extinguishers; -Ensure that fire extinguisher remain unobstructed; - Ensure that fire extinguisher are properly maintained	Supervisors were trained to routinely check all environment safety in order to avoid future repetitions. Additionally, all compliance officers and supervisors now have a daily checklist routine, to report OSH issues in an hourly schedule.	24

Jun-18	Occupational Safety and Health	Emergency Preparedness	Less than the 10 percent of the workforce was trained in firefighting.	Ensure that 10% of the workforce is train in firefighting; Fortify training methods internally; Discuss with top management regarding training schedule	Training are scheduled to be carried out internally every 3 months.	3
Jun-18	Occupational Safety and Health	Emergency Preparedness	Evacuation plan not updated.	Ensure that the evacuation maps are updated.	All evacuation routes were re-painted and all unclear evacuation routes were marked with additional arrows in order to make the route more visible and comprehensible. All evacuation maps have been updated and installed in the departments that needed correction.	6
Jun-18	Occupational Safety and Health	Emergency Preparedness	Evacuation routes were obstructed by boxes in the packing area of module 1 and 6..	Ensure that evacuation routes remain unobstructed; - Assign accountability to monitor such issues.	The factory repainted the routes and additionally, emphasized the supervision of all evacuation routes. The visibility of the newly repainted evacuation routes will help workers distinguish them better and thus, eradicate obstruction. Workers from the packing area have been retrained regarding where to store finished products without disturbing evacuation routes.	3
Jun-18	Occupational Safety and Health	Emergency Preparedness	Fire drills were not conducted every 6 months in all buildings.	Ensure to perform a fire drill twice a year; Schedule an agenda to perform drill in each module; Document the related evidences.	The company has conducted an additional emergency drill that has been monitored by SONAPI.	3
Jun-18	Compensation	Paid Leave	Pregnant workers were paid based on the minimum wage and not based on the average earnings.	Review the payment system that is reliable; Train the relevant people that are entering the data.	The HR Secretary who introduced the digits wrongly was given an in depth training. The compliance department carries out in-depth self audits regarding maternity and sick leave to double check all payments and assure they have been carried out properly.	18
Jun-18	Contract and Human Resources	Dialogue, Discipline and Disputes	A physical abuse case in washing department.	Ensure that in line supervisor and managers are aware and committed to respect the in place Zero Tolerance policy; Ensure to follow the grievance policy, the HR procedures and dispute resolution policy in place; Investigate performance of under policies and policies.	The washing manager was given both verbal and written warning. The washing manager received a Compliance Training regarding Zero Tolerance Policy and the company's internal regulation.A compliance training was carried for all expat	3

Jun-18	Occupational Safety and Health	OSH Management Systems	The OSH Policy has not been developed in consultation with workers and their representatives.	Ensure to review the OSH policy in consultation with worker representatives in the bipartite committees.	Meeting with worker representatives to be held before the end of October 2018 to review the OSH policy.	3
Jun-18	Occupational Safety and Health	Chemicals and Hazardous Substances	Several chemicals are not included in the inventory. In addition, the inventory does not include all the location even though assessors found that chemicals were stored in different places	Ensure that all chemicals used are included in the inventory and that the inventory is adequately documented	All compliance officers and managers were trained on the importance of maintain and updating their chemical inventory list. Training was also provided to all workers using chemicals. The chemical inventory list has been systemized therefore updating the inventory will be effectively done by all departments.	3
Jun-18	Occupational Safety and Health	Chemicals and Hazardous Substances	Unidentified containers.	Labell all chemicals and hazardous substances used in the workplace.	The Compliance department has purchased stickers of different sizes that have been attached to all chemical drums and containers, helping workers distinguish and classify the content. The FCO, department supervisor and workers from the chemical shop were re-trained regarding chemical handling procedures and EMS.	33
Jun-18	Occupational Safety and Health	Chemicals and Hazardous Substances	Chemicals were not stored properly. The storage areas were not adequately ventilated. .	-Store chemical in the right place; -Have written procedures on the usage of chemicals; - Train chemical users on the handling of chemical.	All chemicals were moved to the Chemical room. The FCO, department supervisor and workers from said department were retrained regarding chemical handling procedures, storing and EMS.	9
Jun-18	Occupational Safety and Health	Chemicals and Hazardous Substances	MSDS were not available for several products.	- Ensure that MSDS are available where chemicals are used and stored. -Ensure that MSDS are available in the local language.	All MSDS have been posted in all chemical using and storing departments. Adequate training was provided to relevant employees.	9
Jun-18	Occupational Safety and Health	Chemicals and Hazardous Substances	Eye wash stations in the mechanical workshop of module 6 and 7 were not functional.	- Ensure that cleaning facility is available in the area where chemical are used; - Fix the eye wash station in the mechanical workshop.	All supervisors that have eye wash stations in their departments have been asked to fill in and change the water daily. All supervisors are now required to complete a daily-checklist that will ensure that eye wash stations are always full and operational for workers	9

Jun-18	Occupational Safety and Health	Worker Protection	No proper masks were provided to workers in the spot cleaning area.	Provide adequate PPE to workers in the spot cleaning areas. Assign accountability to supervisor and factory compliance officer to monitor the availability of PPE. Train spot cleaning area's workers on PPE.	The compliance department conducted a H&S training for all workers of the department. Supervisors were trained to encourage workers to use of their safety equipments, as they could affect other workers' behaviors too.	33
Jun-18	Occupational Safety and Health	Worker Protection	Inadequate personal protective equipment in the mechanic workshop of module 5.	Provide adequate and necessary PPE to workers.	The Compliance department has conducted numerous Trainings related to the use of PPEs to all workers. The supervisor are assigned to check all equipment hourly to ensure all workers are making proper use of their PPEs.	33
Jun-18	Occupational Safety and Health	Worker Protection	Standing workers in module 1 and module 6 were not provided with foot rests or shock absorbing mats. Some chairs provided to the workers were missing back rest.	<ul style="list-style-type: none"> - Perform regular OSH audits in each module; -Train Factory compliance office on the supply requisition procedures; -Ensure that standing workers are provided with foot rests or shock absorbing mats. 	Standing mats have been stuck onto the floor for workers who have standing jobs. Supervisors have been given the duty of checking if any additional workers need standing matts. Management has removed all the inadequate seats and replaced them with chairs that have back rests.	3
Assessment July 2017						
Jul-17	Compensation	Paid Leave	Incorrect basis used (minimum wage) to calculate legally mandated holiday payments for workers entitled to incentives.	Employees who receive incentives for piece rate work should be paid based on average earnings for legally mandated holidays.	Payment of holidays has been adjusted accordingly.	
Jul-17	Compensation	Paid Leave	Incorrect basis used (minimum wage) to calculate weekly days payments for workers entitled to incentives.	Employees who receive incentives for piece rate work should be paid for weekly rest days based on average earnings.	Payment of weekly rest day has been adjusted accordingly	
Jul-17	Compensation	Paid Leave	Incorrect basis (minimum wage) used to calculate sick for workers entitled to incentives.	Employees who receive incentives for piece rate work should be paid for sick leaves based on average earnings.	Payment of sick leave has been adjusted accordingly	
Jul-17	Compensation	Paid Leave	Incorrect basis used to calculate maternity leave payments for workers entitled to incentives.	Employees who receive incentives for piece rate work should be compensated for maternity leaves based on average earnings.	Payment of maternity leave has been adjusted accordingly	
Jul-17	Compensation	Social Security and Other Benefits	Incorrect basis used to calculate the employer's contributions to ONA.	For workers entitled to incentive payments, the employer's contribution to ONA should be based on these workers' base salaries	Employer's contributions to ONA has been adjusted accordingly	

Jul-17	Compensation	Social Security and Other Benefits	Employer contributions to OFATMA.	Register for the maternity and health insurance service with OFATMA.	Company had meetings with OFATMA representatives in order to make sure that OFATMA services will be available to all workers.	
Jul-17	Compensation	Social Security and Other Benefits	Workers contributions to OFATMA.	Register for the maternity and health insurance service with OFATMA.	Company had meetings with OFATMA representatives in order to make sure that OFATMA services will be available to all workers.	
Jul-17	Contract and Human Resources	Employment Contracts	Employment contracts' compliance with the labour code.	Company needs to review the employment status of all temporary workers and issue adequate contracts.	The company recategorized all temporary workers as regular workers. All the relevant workers have also signed new contracts and are now receiving the legally stipulated benefits for regular workers.	
Jul-17	Contract and Human Resources	Contracting Procedures	Non-compliance with legal requirements for non-production workers (security guards)	Ensure overtime hours are within legal limits.		
Jul-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Unidentified and unlabeled chemical containers.	Properly maintain and store chemical products. Assign a person in charge of monitoring the chemical labeling process.	The factory marked various storage tanks for oil, gas and water. The mechanics and the factory Compliance officers are in charge of regularly monitoring the labeling process.	
Jul-17	Occupational Safety and Health	Chemicals and Hazardous Substances	No MSDS' posted for chemicals in the spare mechanical parts warehouse in Module 1.	List the chemicals used and stored in the noted area and post the required MSDS. This process should be monitored regularly.	All MSDS' have been posted. The Compliance Team is conducting regular weekly audits to ensure that MSDS' are always available	
Jul-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Non-functional eye wash station. No eye wash station in the mechanical spare parts warehouse.	Eye wash stations should be maintained properly.	Eye wash station was installed.	
Jul-17	Occupational Safety and Health	Worker Protection	Workers in the pressing section were not using the protective ear plugs provided by the factory.	Training needed on regular PPE usage for both workers and supervisors.	PPE are provided to workers. Several trainings, warning letters and disciplinary actions, were implemented.	
Jul-17	Occupational Safety and Health	Worker Protection	Several single needle machines were missing finger guards.	Install finger guards as required. Conduct regular inspections of safety guards on all machines.	This issue has been immediately addressed by installing finger guards as required.	
Jul-17	Occupational Safety and Health	Worker Protection	No exit signs posted in warehouse 2.	Ensure that exit signs are posted above all exit doors.	Exit signs are posted above all exit doors.	

Jul-17	Occupational Safety and Health	Working Environment	Workplace temperatures.	Ensure that the workplace temperature does not exceed a maximum of 30 C.	The factory has installed cooling systems in all the modules. Several non-functioning exhaust fans were repaired to ensure compliance with this point. Thermometers have been installed in each department to better monitor the temperature. Non-functioning parts of the cooling system are being repaired.	
Jul-17	Occupational Safety and Health	Working Environment	Noise levels exceeded the recommended limit.	Ensure that the noise level does not exceed a maximum of 90 dB. Provide PPE training for both workers and supervisors. Ensure that PPE regulations are strictly applied in the noisy areas.	The employer monitors the noise levels and posted warning signs in the pressing area to encourage workers to use ear plugs. Noise warnings have also been posted in the factory's administration office to warn employees to reduce noise levels at the workplace.	
Jul-17	Occupational Safety and Health	Welfare Facilities	Comply with the legal requirement for the number of toilets for men and women.	Provide more restrooms for men.	Based on the gender distribution in each unit, some of the women's restrooms were reallocated for men.	
Jul-17	Occupational Safety and Health	Health Services and First Aid	Insufficient number of nurses.	Hire more nurses.	The factory hired additional nurses.	
Jul-17	Occupational Safety and Health	Health Services and First Aid	Inadequate number of first aid boxes; some of the existing boxes are inaccessible.	First aid boxes should be easily accessible and provided throughout the workplace.	Additional first aid boxes have been installed in the main storage area.	
Jul-17	Occupational Safety and Health	Emergency Preparedness	Obstructed access to a fire alarm switch. No smoke detectors in the warehouse.	Ensure that all fire alarm switches are easily accessible. Install smoke detectors in the warehouse.	Smoke detectors have been installed in warehouses 1 and 2;	
Jul-17	Occupational Safety and Health	Emergency Preparedness	Unreliable fire extinguisher maintenance services.	Ensure that all fire extinguishers are adequately maintained.	All the fire extinguishers have been placed in their designated locations.	
Jul-17	Occupational Safety and Health	Emergency Preparedness	An evacuation map was missing in washing section 1.	Provide evacuation maps throughout the factory.	Evacuation maps have been posted in all the different sections throughout the factory.	
Jul-17	Occupational Safety and Health	OSH Management systems	Work-related accidents records were not submitted to OFATMA.	Submit accidents records to OFATMA on a monthly basis.	The factory submitted all accidents records to OFATMA. The compliance department is now in charge of ensuring that this is done on a monthly basis.	

Jul-17	Working Time	Regular Hours	Multiple work schedules inconsistent with collective working agreements and the law.	Approval from MAST is needed for any changes related to working hours.	Company obtained an approval letter from MAST. All workers are informed of the new working hours.	
Jul-17	Working Time	Overtime	Overtime limits	Ensure that overtime work does not exceed legal limits.		
Jul-17	Working Time	Overtime	Unauthorized overtime work.	Obtain MAST's approval prior to performing overtime work.		



Factory: Silver Linings S.A
Location: Port-Au-Prince
Number of workers: 662
Date of registration: Oct-09
Date of last two Better Jun-17

May-18

Advisory and Training Services

13-Sep-18 Advisory visit to investigate the dismissal of trade unions. Meeting with management to review the improvement plan and introduction to the new online progress report. Factory visit to validate the status of OSH issues.

13-Sep-18 PICC meeting to Present the last assessment report and identify priorities.

29-Jun-18 Industry Seminar Chemical Management System

5-Jun-18 Industry Seminar on Supervisory Skills (SST)

1-Jun-18 Industry seminar on Leadership Skills

27-Apr-18 Advisory visit to review employment contract and the internal work rules. Follow up on the chemical action plan. Review the following points in the payroll : Annual leave and maternity leave, payments for Weekly rest day and legally mandated holiday, ONA and OFATMA deductions. Factory tour to review OSH :-----

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDATION EFFORTS	MONTHS
Assessment May 2018						
May-18	Occupational Safety and Health	Health Services and First Aid	The factory does not provide workers health checks within the first three months of hiring.	Provide workers health checks within the first three months of hiring.		
May-18	Occupational Safety and Health	Health Services and First Aid	The factory did not show evidence of annual medical checks for workers.	Provide annual medical checks for workers.		
May-18	Occupational Safety and Health	Health Services and First Aid	Onsite medical facilities and staff is insufficient.	Hire the additional medical staff.		
May-18	Occupational Safety and Health	OSH Management Systems	Legally required construction/building permits are not available.	Perform a building safety inspection.		30
May-18	Occupational Safety and Health	OSH Management Systems	The OSH policy is not signed by top management and it was not developed in consultation with worker representatives.	Translate the OSH policy into the local language, consult with worker representatives an ensure that the policy is signed by top management.		30
May-18	Occupational Safety and Health	Welfare Facilities	The results of water test revealed the presence of colonies after 48 hours	Provide free drinking water to workers	The maintenance manager has been assigned to manage the water filtration svstem.	30
May-18	Occupational Safety and Health	Worker Protection	Standing workers in the stock room operating without standing mats.	Provide standing mats to the standing workers	All floor mats have been installed to all stations required.	31

Assessment December 2017						
Dec-17	Compensation	Social Security and Other Benefits	Employer contribution to ONA is less than 6 percent of workers' base salaries.	Ensure that ONA payment is based on the basic salary instead of worker's minimum wages. Submit the monthly payment within the first 10 working days of the following month.		18
Dec-17	Compensation	Social Security and Other Benefits	Workers' contributions to ONA is base on the minimum wage.	Ensure that ONA payment is based on the basic salary instead of worker's minimum wages.		18
Dec-17	Compensation	Social Security and Other Benefits	Payment of employer's contribution for the OFATMA for the maternity and health insurance is innacurate.	Forward 3 percent of workers' base salary to OFATMA for maternity and health insurance.		18
Dec-17	Compensation	Social Security and Other Benefits	Payment of workers' contribution for the OFATMA for the maternity and health insurance is innacurate.	Collect and forward 3 percent of workers' base salary to OFATMA for maternity and health insurance.		18
Dec-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Unlabelled containers of machine oil in the generators' room.	Labell all hazardous and chemicals substances used in the workplace.	All containers on the production floor and in engine room were identified.	
Dec-17	Occupational Safety and Health	Emergency Preparedness	The routes in the storage and warehouse areas are not clearly marked.	Paint evacuation arrows and signs	All markings and painting has been done on the floor and all exits and signs were identified.	



Factory: Sewing International S.A
Location: Port-au-Prince
Number of workers: 2208
Date of registration: Sep-09
Date of last two Better Work Jun-18 May-17

Advisory and Training activities

19-Sep-18 Advisory visit to discuss on the Improvement Plan with HR and Compliance managers. Performed OSH tour for hazard hunting with compliance officer. Discussed OSH issues with OSH committee during advisory visit

19-Sep-18 Sexual Harassment Awareness and Prevention Supervisors

19-Sep-18 Sexual Harassment Awareness and Prevention Middle Management

19-Sep-18 Sexual Harassment Awareness and Prevention Workers

10-Aug-18 Advisory visit to work on the PR1 with HR and Compliance Manager. Review of the assessment Report with members of the bipartite Committee during advisory visit.

29-Jun-18 Industry Seminar on Chemical Management System

9-May-18 Advisory visit to review the management system documents and discuss the functioning of the PICC with HR manager. Performed review of procedures with HR manager (accident investigation, risk management with the HR manager.

5-May-18 Bipartite Committee (PICC/LKSB/PC) Training

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDIATION EFFORTS	MONTHS
Assessment June 2018						
Jun-18	Compensation	Overtime Wages	The factory pays 50 percent above the normal wage for overtime until 5 pm. Any time worked after 4 pm without prior approval is not compensated.	Clarify policy with respect to the conditions of overtime hours and payments through consultations with worker representatives.	Management is working to clarify and is considering the elimination of all possible unauthorized overtime.	4
Jun-18	Compensation	Wage Information, Use and Deduction	Payroll review revealed that wage deductions, such as loan, made by the employer exceeded 1/6 of workers' monthly earnings.	Ensure that wage deductions, such as loan, made by the employer do not exceed 1/6 of workers' monthly earnings.	Review of payroll deductions revealed that some payments for 1 out of 5 worker loan reimbursements were still exceeding 1/6 of monthly	4
Jun-18	Compensation	Wage Information, Use and Deduction	Time records of overtime hours worked without prior authorization are not recorded in the payroll and are not compensated.	Ensure that time records of all overtime hours worked are recorded in the payroll and compensated.	Management is working to clarify and is considering the elimination of all possible unauthorized overtime.	4

Jun-18	Compensation	Social Security and Other Benefits	The last employer contribution based on the minimum wage instead of worker's basic salary as required by the Haitian Labor Code.	Ensure payments are based on the worker's basic salary as required by the Haitian Labor Code.	Management has plans to introduce deductions for ONA based on worker's basic salary following the recent increase in minimum wage to reduce the impact to workers and the potential for backlash.	30
Jun-18	Compensation	Social Security and Other Benefits	Workers' contributions are based on the minimum wage instead of the worker's basic salary as required by the Haitian Labor Code.	Ensure payments are based on the worker's basic salary as required by the Haitian Labor Code.	Management has plans to introduce deductions for ONA based on worker's basic salary following the recent increase in minimum wage to reduce the impact to workers and the potential for backlash.	30
Jun-18	Compensation	Social Security and Other Benefits	Late payment for work related accident insurance.	Follow installment agreements approved by OFATMA and make payments according to expected deadlines		4
Jun-18	Compensation	Social Security and Other Benefits	The calculation of the employer contributions made to OFATMA is 2% of the minimum salary for 20 days worked instead of 3% of workers' base salary as required by law.	Ensure the employer's contribution to OFATMA for maternity and health insurance is based on 3% of workers' base salary as required by law.	Management discussion on the appropriate contributions are still ongoing.	30
Jun-18	Compensation	Social Security and Other Benefits	The factory collects 2% of minimum salary for 20 days worked instead of collecting 3% of workers' base salary as required by law.	Ensure the employer's contribution to OFATMA for maternity and health insurance is based on 3% of workers' base salary as required by law.	Management has plans to introduce the 3% deduction from worker's basic salary following recent increase in minimum wage in order to minimize potential impact to workers and resulting potential backlash.	30
Jun-18	Contract and Human Resources	Termination	Calculation of average earning is not accurate.	Compute average earnings based on days actually worked not including holidays and weekly rest days.	Management made the commitment to properly calculate average earnings based on recommended method of not including holidays and weekly rest days.	4
Jun-18	Contract and Human Resources	Termination	Annual supplement or bonus upon termination. is not accurate.	Verify that payroll system is programmed to respect correct formula and pay correct amount for termination bonus		4

Jun-18	Contract and Human Resources	Dialogue, Discipline and Disputes	The factory did not applied the legal requirements related to termination of contracts under the article 42 of the labor code when terminating workers for gross misconduct.	Ensure application of the legal requirements related to termination of contracts under the article 42 of the labor code. Follow MAST recommendation with the reinstatement of the five union leaders.		4
Jun-18	Occupational Safety and Health	OSH Management Systems	OSH policy not developed in consultation with workers and their representatives and not signed by top management,	Enter consultation with workers and their representatives on existing OSH policy for possible input and/or modification and ensure that it is signed by top management.	Management held discussions with members of bipartite committee regarding OSH policy content and asked for inputs from worker representatives. Policy is	4
Jun-18	Occupational Safety and Health	Chemicals and Hazardous Substances	Incomplete inventory of chemicals used at the factory.	Ensure that all chemicals currently in use are tracked and included in the daily inventory.	Management is currently designing a sustainable system to track and include all chemicals in inventory.	4
Jun-18	Occupational Safety and Health	Chemicals and Hazardous Substances	No MSDSs in the chemical room where chemicals such as Tagout cleaner and machine oil are stored.	Obtain and post the MSDS for Tagout cleaner and machine oil in the chemical room.	Management has eliminated the use of TAGOUT cleaner in production process. The MSDS for machine oil used is being prepared.	4
Jun-18	Occupational Safety and Health	Chemicals and Hazardous Substances	Control and oversight of workers' exposure to chemicals and hazardous substances. were unavailable during the assessment.	Control and oversee worker's exposure to chemicals and hazardous substances. Ensure isolation of such chemicals.		4
Jun-18	Occupational Safety and Health	Chemicals and Hazardous Substances	inspection worker performing tasks assigned to spot cleaning without supervisor approval in her section where eye wash station was not available.	Train workers on proper health and safety procedures	Management issued verbal warning to worker and plan to conduct training on health and safety	4
Jun-18	Occupational Safety and Health	Worker Protection	Workers not provided with helmet, face shield, safety glasses, gloves, aprons for workers in the welding workshop. .	Provide helmet, face shield, safety glasses, gloves, aprons for workers in the welding workshop	Management sent order to supplier for the required equipment	4
Jun-18	Occupational Safety and Health	Worker Protection	Several workers were not provided chairs with backrest.	Ensure workers are provided with chairs with proper backrest	Management is purchasing chairs with appropriate backrests for workers.	4
Jun-18	Occupational Safety and Health	Worker Protection	Machines missing safety guards.	Install all the required safety guards on all sewing machines.	Management has started to replace appropriate safety guards on these particular machines.	4

Jun-18	Occupational Safety and Health	Worker Protection	Uncovered electrical boxes with exposed wires in the compressor room. Exposed electrical wires were observed near a source of water.	Ensure electrical boxes are properly covered with no exposed wires.	The order has been placed for materials to provide adequate cover to electrical boxes.	4
Jun-18	Occupational Safety and Health	Working Environment	Workplace temperatures i exceeded BW recommendation of 30 C.	Workplace temperatures should be maintained below 30 C.	Factory purchased additional fans to control high temperature levels during the summer months. Discussions are being held to consider exhaust fans to draw out the heat through the ceiling.	60
Jun-18	Occupational Safety and Health	Working Environment	Insufficient light levels in the workplace.	Improve the lighting level in the workplace.		4
Jun-18	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets.	Increase the number of toilets and maintain the existing ones.		48
Jun-18	Occupational Safety and Health	Welfare Facilities	Insufficient eating area	Consider expansion of eating area and afford workers adequate eating space.		84
Jun-18	Occupational Safety and Health	Health Services and First Aid	The factory does not provide workers with annual health checks.	Continue with the process of medical checks for all the workers and ensure completion for all worker population.	Management has partially completed the annual medical checks. They will continue with the process for all the workers.	84
Jun-18	Occupational Safety and Health	Health Services and First Aid	Insufficient medical staff.	Comply with the Haitian Labor Code for a factory of this size and have a permanent onsite medical service, with at least 10 nurses and 3 doctor's visits per week		84
Jun-18	Occupational Safety and Health	Emergency Preparedness	The routes in the packing area are not clearly marked.	Repaint routes in the packing area to ensure they are clearly marked.	Management is committed to repaint the evacuation routes.	4
Jun-18	Working Time	Overtime	Workers exceeding 80 hours of overtime limits during a trimester.	Take corrective measures to ensure workers do not go over 80 hours of overtime during the trimester.	Management is limiting overtime for all workers to stay within 80 hours per trimester limit.	84
Jun-18	Occupational Safety and Health	OSH Management Systems	Dust accumulating on the surfaces of electrical equipment and machines. Combustible materials like fabric waste, plastic or paper are scattered around the workplace.	Provide more efficient cleaning equipment for factory floor. Consider usage of vacuums over broom sticks to prevent Dust from accumulate on the surfaces of electrical equipment and machines. Combustible materials like fabric waste or paper should	Management is in discussions to adopt more efficient cleaning systems.	4

Assessment May 2017						
May-17	Compensation	Paid Leave	Payment for maternity leaves is based on the minimum wage instead of the worker's average daily earnings.	Adjust payroll system to ensure that maternity leave payment is accurate.	The changes have been made in the payroll system, payment for maternity leave is based on workers' average earnings as of June 2017.	72
May-17	Compensation	Paid Leave	Payment for sick leaves is based on the minimum wage instead of the workers' average daily earnings.	Adjust payroll system to ensure that sick leave payment is based on workers' average daily earnings.	The changes have been made in the payroll system, payment for maternity leave is based on workers' average earnings as of June 2017.	12
May-17	Compensation	Social Security and Other Benefits	The employer's contribution to ONA is based on the minimum wage.	Ensure on time and accurate payments to ONA. The employer should pay 6 percent of the workers' basic salary to ONA.	Efforts to remediate this finding are still in process. Management is in consultation with workers to present some sustainable solutions to ensure on time and accurate payments.	18
May-17	Compensation	Social Security and Other Benefits	The worker's contribution to ONA is based on the minimum wage.	Ensure on time and accurate payments to ONA. Workers should contribute 6 percent of their basic salary to ONA.	Efforts to remediate this finding are still in process. Management is in consultation with workers to present some sustainable solutions to ensure on time and accurate payments.	18
May-17	Compensation	Social Security and Other Benefits	Employer contribution to OFATMA for maternity and health insurance.	Collect and forward 3 per cent of worker's average earnings.	Efforts to remediate this finding are still in process. Management is in consultation with workers to present some sustainable solutions to ensure on time and accurate payments.	5
May-17	Compensation	Social Security and Other Benefits	Collect and forward worker's contribution to OFATMA for maternity and health insurance.	Ensure that 3 per cent of worker's average earnings collected and forwarded to OFATMA for maternity and health insurance.	Efforts to remediate this finding are still in process. Management is in consultation with workers to present some sustainable solutions to ensure on time and accurate payments.	5
May-17	Working Time	Overtime	Workers from packing, extra and utility worked up to 137 hours of overtime per trimester.	Monitor overtime hours worked in order to comply with the 80 hours allowed per trimester.		72

May-17	Working Time	Overtime	No authorization has yet been obtained from the Ministry of Labor to perform overtime.	Request authorization to work overtime from MAST	The factory received authorization to perform 1 hour of overtime per day until May 2018.	5
May-17	Occupational Safety and Health	Health Services and First Aid	The factory only has 2 nurses and 3 doctor's visits per week.	Factory should have at least 9 nurses.		72
May-17	Occupational Safety and Health	Health Services and First Aid	Medical Check for workers upon hiring.	Ensure that workers receive medical checks within their first three months of hiring.	All newly hired workers during the August 1st to October 18 2018 period have gone through medical evaluation by the onsite doctor.	5
May-17	Occupational Safety and Health	Health Services and First Aid	Annual medical checks for workers.	Ensure annual medical checks is provided to all workers.		72
May-17	Occupational Safety and Health	Health Services and First Aid	Health checks for workers who are exposed to work related hazards.	Provide medical checks at least twice a year to workers who have been exposed to work related hazard.	Workers exposed to work related hazard have received a medical check by the on site doctor.	5
May-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Labeling of chemicals and hazardous substances in spot cleaning area.	Label all containers and display posters on the labeling of chemicals substances. Provide training and identify a person in charge of monitoring.	All containers have been labeled, training have been done for the spot cleaning employees and factory has designated a person monitoring that all containers are labeled.	5
May-17	Occupational Safety and Health	Emergency Preparedness	Fire fighting equipment not installed in the trim warehouse on floor 8.	Install smoke detectors in the trim warehouse Identify areas that need additional smoke detectors, and designate a person in charge of the monthly audit	Factory is in the process of obtaining pricing from several vendors and complete installations by May 2018.	5
May-17	Occupational Safety and Health	Emergency Preparedness	Emergency exit obstructed with fabric.	Create an action plan to ensure all the exits remain unblocked based on the root causes identified.	All emergency exits were observed to be opened and unobstructed during recent advisory visits.	5
May-17	Occupational Safety and Health	Working Environment	Workplace temperatures in the sewing, quality and pressing sections exceeded BW recommendation of 30 C.	Workplace temperatures should be maintained below 30 C.		48
May-17	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets.	Ensure that number of toilets is compliant with the legal requirements.		36
May-17	Occupational Safety and Health	Welfare Facilities	Hand washing facilities and adequate soap.	Ensure that soap is available at all times in the toilets.	Soap has been made available in all toilets.	5

May-17	Occupational Safety and Health	Welfare Facilities	Eating area is insufficient for the total number of workers in the factory.	Increase the capacity of the eating area to appropriate levels.		72
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Factory: Val d'Or Apparel Mfg. S.A
Location: Port-au-Prince
Number of workers: 1260
Date of BW registration : Sep-14

Date of last two Better Work assessments: Sep-17 Nov-16

Advisory and Training Services

6-Apr-18 Industry Seminar on the Compliance Assessment Tool
 14-May-18 Meeting with union members on inadequate cleaning service inside the factory. Discussed efficiency of cleaning operations general director in separate meeting. OSH Tour.
 26-Jun-18 Advisory meeting to discuss Improvement plan with Finance Director. Discussed Industrial relations issues with PICC. OSH tour for Hazard Hunting with OSH Officers
 29-Jun-18 Chemical Management System
 23-Aug-18 Advisory visit to review documentation compensation for legally mandated holydays with Finance director. Held Discussion of OSH issues with PICC. OSH tour with PICC OSH focal points.
 27-Sep-18 Training on Sexual Harassment Awareness and Prevention Middle Management
 27-Sep-18 Training on Sexual Harassment Awareness and Prevention Workers
 27-Sep-18 Training on Sexual Harassment Awareness and Prevention Supervisors

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDATION EFFORTS	MONTHS
Assessment September 2017						
Sep-17	Compensation	Overtime Wages	Some workers were not paid 50 percent premium for overtime hours worked.	Comply with the law regarding the overtime payment.	Management has eliminated most of overtime hours. All occasional overtime are accurately paid per recent verification.	12
Sep-17	Compensation	Premium Pay	Workers were not paid 50 percent above the normal wage for regular hours worked on legally mandated holidays.	Comply with law regarding the overtime payment.	Management is reprogramming its payroll system to properly account and pay for regular hours worked on legally mandated holydays.	12
Sep-17	Compensation	Paid Leave	Payments for non-working holidays are based on the minimum wage instead of average earnings.	Comply with the law regarding the payment for non-working Holidays.	Management is reprogramming its payroll system to comply with the law.	12
Sep-17	Compensation	Paid Leave	Payments for weekly rest days are based on the minimum wage instead of average earnings.	Comply with the law regarding the payment for weekly rest day.	Weekly rest day is paid by management although not currently required under new law.	12
Sep-17	Compensation	Social Security and Other Benefits	The factory calculates ONA contributions based on the minimum wage instead of the base salary.	Comply with the law regarding ONA's contributions.		12
Sep-17	Compensation	Social Security and Other Benefits	ONA deductions are based on the payroll of the last 2 weeks of each month instead of the full month. Late ONA payment .	Comply with the law regarding ONA's deductions.		12

Sep-17	Compensation	Social Security and Other Benefits	The factory has not registered with OFATMA for maternity and health insurance. Management said that the registration is in process.	Register with OFATMA for maternity and health insurance.	Factory completed registration with OFATMA for maternity and health insurance during the last cycle.	35
Sep-17	Compensation	Social Security and Other Benefits	The factory has not registered with OFATMA for maternity and health insurance.	Register with OFATMA for maternity and Health Insurance.	Factory completed registration with OFATMA for maternity and health insurance during the last cycle.	35
Sep-17	Contract and Human Resources	Employment Contracts	The daily break duration listed in the contracts is not in line with the internal work rules.	Align contracts with internal work rules.	Factory modified internal rules to align with agreement with workers on lunch break pending labor ministry approval.	12
Sep-17	Contract and Human Resources	Contracting Procedures	Foreign worker's contracts do not specify the period of employment and the hours of work and these workers are not covered by work-related accident insurance.	Specify the type of employment in the foreign workers' contracts. Ensure that all workers are covered by the OFATMA for work related accidents.	Foreign worker's contracts specify the period of employment and the hours of work and they are covered by the OFATMA for work related accidents.	12
Sep-17	Contract and Human Resources	Dialogue, Discipline and Disputes	Workers reported incidents of verbal abuse by supervisors and managers.	Plan training for supervisors and managers on supervisory skills.	Management has started training for all supervisors on verbal abuse prevention.	23
Sep-17	Occupational Safety and Health	Chemicals and Hazardous Substances	The factory does not maintain an updated inventory of chemicals and hazardous substances.	Maintain a detailed inventory of the chemicals used in the workplace.		12
Sep-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Chemicals and hazardous substances are not properly labeled.	Label all containers used in the workplace in local language.		12
Sep-17	Occupational Safety and Health	Chemicals and Hazardous Substances	The chemical warehouse did not have all the required MSDS.	Provide MSDS for all chemicals or hazardous substances used in the workplace.		12
Sep-17	Occupational Safety and Health	Chemicals and Hazardous Substances	The factory did not show evidence of training for workers who use chemicals and hazardous substances.	Provide training to workers who use chemicals and hazardous substances.	Management provided training internally.	12
Sep-17	Occupational Safety and Health	Worker Protection	Management has not provided proper masks and goggles to workers in the boiler area.	Provide proper Personal protective equipment to workers. Provide goggles to workers in the boiler area.		23
Sep-17	Occupational Safety and Health	Worker Protection	70 percent of workers in the sewing area were not using the installed safety eye guards.	Provide training on the using of sewing machine guards.	Subsequent advisory visits and most recent assessment did not see workers not using safety guards. Factory provided training during the cycle.	22
Sep-17	Occupational Safety and Health	Worker Protection	Pregnant women were observed in chairs without backrests.	Provide workers with chairs with adequate back rest that is also adjustable to required Height at their respective work stations.	Pregnant are provided with adequate chairs. Management is still in process of providing for remaining workforce where required.	22

Sep-17	Occupational Safety and Health	Working Environment	Interviewed workers stated that the workplace temperature was too high. The employer's daily temperature measurements also identified temperatures above 30 C (reaching up to 35 C).	Use a push and pull-type ventilation. Provide or relocate windows in higher position. Use ceiling fans in order to increase the hot air flow directed towards the outside. Conduct regular measurement of temperature.		24
Sep-17	Occupational Safety and Health	Welfare Facilities	The factory has 7 functioning toilets for men and 35 toilets for women. Under the Haitian Labor Code, there should be at least one toilet for every 25 men and one toilet for every 15 women.	Comply with legal requirements regarding the number of toilets.		23
Sep-17	Occupational Safety and Health	Health Services and First Aid	The factory did not show evidence of medical checks conducted for workers within the first three months of hiring.	Coordinate with OFATMA or internal doctor to perform adequate medical checks within 90 days of hiring.		26
Sep-17	Occupational Safety and Health	Health Services and First Aid	The factory did not provide health checks to workers who have been exposed to work-related hazards.	Coordinate with OFATMA or internal doctor to perform the relevant medical checks.		27
Sep-17	Occupational Safety and Health	Health Services and First Aid	The factory did not show evidence of annual medical checks for workers.	Provide free annual checks for all workers once a year in all factories.		28
Sep-17	Occupational Safety and Health	Health Services and First Aid	Insufficient medical staff.	Increase the number of nurse to 6 and ensure that the factory received 5 doctor's visits per week.		29
Sep-17	Occupational Safety and Health	Emergency Preparedness	Missing and obstructed fire extinguishers.	Ensure that all fire extinguishers are accessible and unobstructed.	No fire extinguishers were observed to be obstructed during subsequent advisory visits nor during most recent assessment.	36
Sep-17	Occupational Safety and Health	Emergency Preparedness	Aisles obstructed by fabric rolls and boxes in the workplace.	Assign OSH Committee members to work with supervisors regularly to check the aisles and ensure that they are not obstructed.		31
Sep-17	Occupational Safety and Health	Emergency Preparedness	Obstructed and closed emergency exits found in the workplace.	Ensure that emergency exit doors are accessible and can be opened without obstruction or delay.	Management left doors opened half way with security guards in attendance in order to open fully in the event of an evacuation.	32
Sep-17	Occupational Safety and Health	Emergency Preparedness	No operating procedures available for the boiler.	Obtain proper manual for boiler from the manufacturer. Provide operator with a log to record daily operations.		33
Sep-17	Working Time	Overtime	A review of attendance records revealed that the factory exceeds the legal overtime limit for workers in the production, cleaning and cut control areas.	Monitor working hours to ensure that the limit of 80 hours for a trimester is not exceeded.	Management has taken measures to limit overtime to a strict minimum.	28

Sep-17	Working Time	Overtime	The last authorization for overtime was obtained for the period starting from March to August 2017.	Obtain proper authorization for overtime when required.	This requirement is no longer a legal obligation under the new law.	29
Assessment November 2016						
Nov-16	Discrimination	Gender	Confirmed case of sexual harassment	Maintain a strict policy against sexual harassment at the workplace and systematically train newly hired workers, supervisors and managers on this topic. Strengthen and encourage the use of grievance reporting mechanisms and address any cases at an early stage.	Factory management conducted their own internal investigation and then implemented the following actions : 1) Training for supervisors and managers on sexual harassment prevention 2) Distribution of Valdor's policy against sexual harassment to supervisors 3) Posting the creole version of the policy on the bulletin board 4) Disciplinary measures taken against the supervisory staff	11
Nov-16	Compensation	Paid Leave	The payment for sick leaves is not accurate for all workers.	Accurately compensate workers for sick leaves in accordance with legal requirements.	involved in the reported cases. Sick leave is now correctly compensated regarding to the Haitian Labor Code.	23
Nov-16	Compensation	Paid Leave	The payment for maternity leaves is not accurate for all workers.	Accurately compensate workers for sick leaves in accordance with legal requirements.	The sick leave is correctly paid now. It is based on average earnings.	23
Nov-16	Compensation	Social Security and Other Benefits	The factory has not registered with the health and maternity insurance provider of OFATMA.	Ensure that the factory is affiliated to the health and maternity insurance by OFATMA.	The factory invited OFATMA to promote the program with the workers before they start with registration.	23
Nov-16	Compensation	Social Security and Other Benefits	The factory does not collect and forward worker's contribution for the health and maternity insurance of OFATMA.	Ensure that the factory is affiliated to the health and maternity insurance by OFATMA.	The factory invited OFATMA to promote the program with the workers before they start with registration.	23
Nov-16	Contract and Human Resources	Dialogue, Discipline and Disputes	Verbal abuse cases were found at the factory.	Reinforce the grievance mechanism system. Provide training on supervisory skills. Post messages encouraging mutual respect throughout the workplace.	The factory has launched a series of training sessions for supervisors and management. Awareness raising posters are displayed on the bulletin board to encourage workers to use the suggestion boxes or to report any abuses from supervisors and managers directly to the HD.	11
Nov-16	Occupational Safety and Health	Worker Protection	The maintenance staff were not using dust masks and gloves, which were provided by management.	Train workers on the usage of PPE.	The factory planned to perform Continuous training for the maintenance crew and production operators along the year. They have already held regulars reminder sessions.	11
Nov-16	Occupational Safety and Health	Worker Protection	Exposed electrical wire found in the workplace.	Establish and maintain an effective electrical installation management system.	Electrical wires are properly maintained by the factory electrician.	11

Nov-16	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets.	Provide an adequate number of accessible toilets for all workers in accordance with the Haitian labor code.	Management agreed to contact the owner of the industrial park to study the feasibility of adding new toilets. In the meantime, they will try to reallocate some of the men's toilets for the women.	11
Nov-16	Occupational Safety and Health	Welfare Facilities	During the factory tour, EAs observed that there was no soap in the workers' toilets.	Establish and maintain an effective OSH management system.	Management regularly supplied soap to all the toilets. Also, management aims to train the personnel working in the toilets to monitor this issue regularly.	11
Nov-16	Occupational Safety and Health	Health Services and First Aid	Insufficient number of medical staff.	Comply with the Haitian Labor Code regarding the provision of onsite medical services.	The factory has signed a new contract with the medical services provider DASH which include a 5 day Doctor visits as of June 1st, and one nurse. The factory has hired three additional nurses. The factory is in compliance with the articles 478 & 479 of the Haitian Labor Code.	11
Nov-16	Occupational Safety and Health	Health Services and First Aid	First aid boxes not well supplied.	Ensure that all first-aid boxes are adequately equipped and can be easily accessible in a timely manner.	The OSH team is being re-trained on these requirements as some of the previously trained members have resigned. All the listed products are in the first aid boxes. During the last advisory the box were opened within the 2 minutes	11
Nov-16	Occupational Safety and Health	Emergency Preparedness	Obstructed and misplaced fire extinguishers found in the workplace.	Adequately maintain all firefighting equipment so that they are easily accessible in case of emergencies.	All fire extinguisher area were cleaned up and the firefighting equipment's were easily accessible	11
Nov-16	Occupational Safety and Health	Emergency Preparedness	Several exit doors could not be fully opened and two other exit doors were found locked.	Ensure that the emergency exits are unlocked and unobstructed during working hours. To reduce the impact of the wind on work processes, management will also install plastic curtains on the door ways.	Management has installed plastic curtains on all exits doors to let those emergency exits unlocked and to reduce the impact of the wind.	11
Nov-16	Occupational Safety and Health	Emergency Preparedness	Cell phones were being charged inappropriately throughout the workplace.	Provide a designated phone charging station and post "No phone charging" signs in all other areas throughout the workplace.	A cell phone charging station was installed	11



Factory: The Willbes Haitian II S.A.
Location: Port-au-Prince
Number of workers: 1405
Date of registration: Aug-10
Date of last two Better Work Jun-16 Jul-18

Advisory and Training

24-Aug-18 Meeting with management on March and April strike. Review of the termination files and procedures. Interview conducted with workers and trade unions on the March and April strikes.
 20-Apr-18 Discussion with compliance team on Progress report 1 new template and Improvement plan update. Factory tour with OSH- OSH committee members to validate OSH remediations.
 28-Jan-18 Heavy Load Lifting & Accident investigation Training

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDIATION EFFORTS	MONTHS
Assessment July 2018						
Jul-18	Occupational Safety and Health	OSH Management Systems	The employer has not developed any mechanism to ensure cooperation on OSH matters.	Have a functioning OSH committee that is involved in developing mechanism to ensure cooperation.	The factory has an active OSH committee. Meeting are being carry out on a monthly basis.	5
Jul-18	Occupational Safety and Health	OSH Management Systems	The OSH policy has not been developed in consultation with workers and their representatives and is not signed by top management.	Update the OSH policy with the participation of the worker representatives.	OSH policy will be develop with consultation with the OSH committee members. Facility will ensure to properly sign the OSH policy.	5
Jul-18	Occupational Safety and Health	Worker Protection	Workers in the mechanic shop only operated with goggles and were not provided with gloves.	-Provide gloves to the workers of the mechanic shop -Ensure that workers are provided with necessary PPE -Train workers to use the provided PPE when necessary.	Facility will ensure to provide gloves to the workers of the mechanic shop. Workers will be properly trained in use of the PPE.	67
Jul-18	Occupational Safety and Health	Worker Protection	Standing workers in the packing area of building 43 did not have shock absorbing mats.	Provide shock absorbing mats to standing workers.	Facility will ensure to provide additional standing mats to workers in standing position at building # 43.	5
Jul-18	Occupational Safety and Health	Worker Protection	Poorly maintained electrical box with lose wires covered with black tape in the mechanic shop of building 42.	Maintain regularly the electrical installations.	Electrical box with lose wires at the mechanic shop will be properly covered. Maintenance personnel will be properly trained.	82
Jul-18	Occupational Safety and Health	Working Environment	The workplace temperatures exceeded the recommended 30 C in the packing , pressing , cutting, quality sections.	Monitor the worplace temperature to maintain it to a maximum of 30 C.	Inadequate temperature will be revised.	5
Jul-18	Occupational Safety and Health	Working Environment	The level of lighting was inadequate in the pressing section.	Improve the Lux level in the pressing section.	Inadequate light levels will be revised	5
Jul-18	Occupational Safety and Health	Health Services and First Aid	Insufficient number of onsite medical staff.	Hire a permanent medical staff with 6 nurses and 3 doctor's visit.	Facility has a permanent medical staff. Facility does not have plan to increase	82
Jul-18	Occupational Safety and Health	Health Services and First Aid	Missing items in the first aid box such as Alcohol, scissors and forceps.	Have adequate first aid box available for the workers with necessary products.	Facility will ensure that the content of 1 first aid kit in building 42 matches with the items included in the check list. Alcohol, scissor and forceps will be added.	5
Assessment March 2018						
Mar-17	Compensation	Paid Leave	The payments for non-working holidays are based on the minimum wage instead of average earnings.	Ensure to pay non-working holidays on average earnings.	The payroll system has already been changed, so that the non-worked holidays are paid based on the average earnings.	11

Mar-17	Compensation	Paid Leave	The payments for weekly rest days are based on the minimum wage instead of average earnings..	Ensure that payments for weekly rest days are based on the average earnings.	The payroll system has already been already changed, so that the weekly rest days are paid based on the average earnings.	11
Mar-17	Compensation	Paid Leave	The payments for sick leave are based on the minimum wage instead of average earnings.	Ensure that payments for sick leave are based on the average earnings.	Payment system has been reviewed and all the necessary adjustment been made. Sick leaves are paid based on average earnings.	22
Mar-17	Compensation	Social Security and Other Benefits	ONA contributions is based on the minimum wage instead of the base salary.	Ensure that ONA contributions are based on base salary.	The contribution to ONA for all Wilbes factories is paid based on the workers' base salary.	11
Mar-17	Compensation	Social Security and Other Benefits	Contributions to ONA is calculated based on the minimum wage instead of the base salary.	Ensure that ONA contributions are based on base salary.	ONA contributions are based on base salary. Facility properly collects and forwards workers' contributions to ONA.	11
Mar-17	Compensation	Social Security and Other Benefits	The factory has not registered with OFATMA for maternity and health insurance.	Register with OFATMA for maternity and Health insurance.	The Wilbes Haitian S.A has initiated the registration process with OFATMA, by paying the Company's contribution. The factory forwarded OFATMAS' deduction for the month of September 2017	11
Mar-17	Compensation	Social Security and Other Benefits	The factory has not registered with OFATMA for maternity and health insurance.	Register with OFATMA for maternity and Health insurance.	The Wilbes Haitian S.A has initiated the registration process with OFATMA, by paying the Company's contribution. The factory forwarded OFATMA's deductions for the month of September 2017	11
Mar-17	Occupational Safety and Health	Chemicals and Hazardous Substances	No updated inventory of chemicals and hazardous substances used in the workplace.	Keep an updated inventory of chemicals and hazardous substances used in the workplace	Facility normally keeps an inventory of all chemicals used; the records were not updated due to a shipment received near the audit date and chemicals were not on inventory. The chemicals inventory logbook will be updated and kept normally going forward.	11
Mar-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Unidentified containers of chemicals.	Label all containers of chemicals in Creole-Train mechanics on Occupational Safety and Health concerns.	Facility ensured to have all chemical containers properly labeled and identified in local language in all factories areas.	11
Mar-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Chemicals are not properly stored.	Ensure that chemicals are properly stored.	Facility ensured to have all chemical substances properly stored. Workers received on storage methods provided by Better Work.	11
Mar-17	Occupational Safety and Health	Chemicals and Hazardous Substances	No MSDS' were posted for thinner, HP control and EBD cleaner in the chemical room.	Post MSDS' were chemicals are used. Ensure that they are clearly labelled.	All chemical substances were provided with the MSDS.	11
Mar-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Documented evidence of actions taken by management to control and oversee workers' exposure to chemicals and hazardous substances were unavailable during the assessment.	Keep records of awareness and training provided to workers. Post awareness message on appropriate places throughout the workplace.	The factory keeps records of any training provided to workers.	11
Mar-17	Occupational Safety and Health	Chemicals and Hazardous Substances	No eye wash station in the spot cleaning area of building 45.	Provide washing facility where needed, especially in the spot cleaning.	Facility installed the eye wash station at the spot cleaning room.	34
Mar-17	Occupational Safety and Health	Worker Protection	Workers using thinner, in the inspection area in building 42, were not wearing any protective masks. Management had the chemicals removed during the assessment.	Provide mask to workers that are manipulating chemicals. Provide training to exposed workers on the usage of protective equipment.	This practice was stopped immediately. All work related to chemicals substances is been done at the spot cleaning area where workers are provided with the necessary PPE's to perform their duties.	61
Mar-17	Occupational Safety and Health	Worker Protection	Several workers in buildings 41 and 42 were not using the safety guards installed on their machines.	Ensure that all machines have their necessary guards. Train workers and supervisors on OSH matters.	All the machines have their necessary guards. Training scheduled for supervisors on OSH in September.	76

Mar-17	Occupational Safety and Health	Worker Protection	85 percent of single needle machines in buildings 41 and 42 are missing finger guards.	Ensure that all machines have their necessary guards. Train workers and supervisors on OSH matters.	All single needle machines were provided with its needle guards	76
Mar-17	Occupational Safety and Health	Worker Protection	Several uncovered electrical boxes with exposed wires and cables and other electrical equipment were improperly stored in the packing and pressing sections of building 43.	Regularly maintain electrical equipment. Keep a log of weekly inspection.	All electrical boxes were already covered. Mechanics received a training on Occupational Safety and Health.	76
Mar-17	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets for women.	Comply with the law regarding the number of functioning toilets.	22 additional toilets have been added. The factory does not have more plans to increase the number of toilets as we comply with International standards. Building additional toilets would be hard due to the lack of space.	76
Mar-17	Occupational Safety and Health	Health Services and First Aid	No systematic medical checks were arranged for workers exposed to work-related hazards.	Arrange, at least, twice a year, medical checks for workers exposed to work-related hazards.	All mandatory medical checks for all Willbes factory workers have been started already. The plan will take around 4 months. Additional checks are being requested to OFATMA as well. Also, the factory changed the doctor's contract to full-time and started with the medical checks.	76
Mar-17	Occupational Safety and Health	Health Services and First Aid	No systematic annual medical checks for all workers.	Arrange, at least, once a year, medical checks for all workers.	All mandatory medical checks for all Willbes factory workers have been started already. The plan will take around 4 months. Additional checks are being requested to OFATMA as well. Also, the factory changed the doctor's contract to full-time and started with the medical checks.	76
Mar-17	Occupational Safety and Health	Health Services and First Aid	Insufficient medical staff.	Have an appropriate number of medical staff according to their workforce as required by Haitian Labor Code.	Facility has an additional clinic on site. Management is making all the arrangement in order to increase our medical staff.	76
Mar-17	Occupational Safety and Health	Emergency Preparedness	Several obstructed fire alarms switches were observed in buildings 42 and 43. No smoke detectors were observed in buildings 41, 44 and 46.	Ensure to have appropriate fire fighting equipment. Install smoke detectors in buildings 41,44,46.	Facility took immediate action on these findings. Fire alarms are properly maintained and accessible, switches are properly covered. Smoke detectors will be installed shortly.	11
Mar-17	Occupational Safety and Health	Emergency Preparedness	Fire extinguisher not properly maintained.	Regularly maintain fire extinguishers. Keep an OSH checklist to update regularly. Perform regularly internal OSH assessment.	Fire extinguishers were installed in the designated areas and properly maintained.	76
Mar-17	Occupational Safety and Health	Emergency Preparedness	Inaccurate evacuation map.	Post the updated evacuation plan. Equip exits with emergency exit lights. Accordingly mark the floor with the new layout.	The evacuation plan has been updated according to the new layout of the floor. New emergency exit lights have been purchased and installed	11
Mar-17	Occupational Safety and Health	Emergency Preparedness	One exit was locked.	Keep the exits accessible during working hours.	Facility already has emergency exit accessible. Construction works already	11
Jun-16	Compensation	Paid Leave	Inaccurate payment for annual leave.	Pay the maternity leave payments based on the average earnings.	Maternity leave payments is based on the average of all earnings from the last three months of work.	
Jun-16	Compensation	Paid Leave	Inaccurate payment for breastfeeding breaks.	Pay breastfeeding breaks based on the module's earnings.	Nursing workers receive compensation based on the module's earnings for the time taken for the breastfeeding break.	
Jun-16	Compensation	Paid Leave	Calculation of annual salary supplements or bonuses was inaccurate.	Pay the maternity leave payments based on the average earnings.	Maternity leave payment is considered as a part of total earnings when calculating annual salary supplements or bonuses.	
Jun-16	Occupational Safety and Health	Chemicals and Hazardous Substances	Unlabelled containers in the chemical room of Thinner.	Ensure that all chemical containers are labeled and stored properly.	All chemical containers were properly labeled at the chemical warehouse.	

Jun-16	Occupational Safety and Health	Chemicals and Hazardous Substances	MSDS were missing for two chemical products found in the material room in building 42.	Ensure that all chemical products are properly stored and provided with MSDS.	Thinner is no longer used in the boiler room or the cutting area, facility ensured that all chemical products are properly stored and provided with MSDS.	
Jun-16	Occupational Safety and Health	Chemicals and Hazardous Substances	Inadequate washing facilities or cleansing materials in the event of chemical exposure.	Provide adequate washing facilities in areas where chemicals are regularly used.	The ink preparation room was equipped with an eye wash station and the one in the chemical room has been repaired.	
Jun-16	Occupational Safety and Health	Worker Protection	Workers in the generator and the boiler rooms were not provided with adequate personal protective clothing and equipment.	Provide earplugs to the workers in the generator room and heat protective aprons for those in the boiler room.	Earplugs were provided to workers in the generator room.	
Jun-16	Occupational Safety and Health	Worker Protection	Several machines were observed to be missing eye guards and finger guards.	Equip all machines with the necessary safety guards. Train the supervisors on the importance of the guards.	All sewing machines were provided with its respective safety guards.	
Jun-16	Occupational Safety and Health	Worker Protection	Electrical boxes were improperly maintained.	Ensure that all electrical boxes are covered.	All the electrical boxes are properly covered.	
Jun-16	Occupational Safety and Health	Working Environment	Workplace temperatures exceeded the recommended limits.	Monitor the workplace temperature to maintain it under the recommended 30 C.	A cooling system has been installed.	
Jun-16	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets for women.	Comply with the Haitian law regarding the provision of toilets.	0	
Jun-16	Occupational Safety and Health	Welfare Facilities	The eating area could not adequately accommodate all workers during lunch break.	Provide adequate eating areas to accommodate all workers.	Two new eating areas are available for the workers.	
Jun-16	Occupational Safety and Health	Health Services and First Aid	No medical check during the first three months of employment.	Conduct medical checks for newly recruited workers.	All mandatory medical checks for all Willbes factory workers have started already. The plan will take around 4 months. Additional checks are being requested to OFATMA as well.	
Jun-16	Occupational Safety and Health	Health Services and First Aid	The factory does not conduct regular health checks for workers who are exposed to work-related hazards.	Ensure that all workers who are exposed to work-related hazards receive biannual medical checks.	All mandatory medical checks for all Willbes factory workers have started already. The plan will take around 4 months. Additional checks are being requested to OFATMA as well.	
Jun-16	Occupational Safety and Health	Health Services and First Aid	Not all the workers receive annual medical checks.	Perform annual health checks for all workers,	The factory has a doctor who will provide health checks to workers on a regular basis.	
Jun-16	Occupational Safety and Health	Health Services and First Aid	Insufficient number of onsite medical staff.	Hire a permanent medical staff with 6 nurses and 3 doctor's visit.	Facility has an additional clinic on site. All the arrangement are being made in order to increase the medical staff. The factory has 6 doctors' visits per week.	
Jun-16	Occupational Safety and Health	Emergency Preparedness	Access to fire extinguishers were obstructed.	Keep fire extinguisher accessible.	All fire extinguishers are easily accessible and unobstructed. Members of compliance team are doing OSH daily tours to ensure that extinguishers are unobstructed.	



Factory: The WILLBES Haitian III S.A
Location: Port-au-Prince
Number of workers: 728
Date of registration: Aug-10
Date of last two Better Work Jun-18 May-17

Advisory and Training

Services
 24-Aug-18 Discussion with compliance team on Progress report 1 new template and Improvement plan update.Factory tour with OSH- OSH committee members to validate OSH remediations.
 20-Apr-18 Meeting with management on March and April strike.Review of the termination files and procedures.Interview conducted with workers and trade unions on the March an April strikes.
 6-Apr-18 Compliance Assessment Tool Industry Seminar

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDATION EFFORTS	MONTHS
Assessment July 2018						
Jul-18	Compensation	Social Security and Other Benefits	Late ONA payment.	Ensure ONA contributions is paid within the first 10 working days of each month for the previous month.	Management ensure that ONA payment is done between the first 10 working days of each month.	26
Jul-18	Compensation	Social Security and Other Benefits	Late ONA payment.	Ensure ONA contributions is paid within the first 10 working days of each month for the previous month.	Management ensure that ONA payment is done between the first 10 working days of each month.	26
Jul-18	Occupational Safety and Health	OSH Management Systems	The employer has not developed any mechanism to ensure cooperation on OSH matters.	Establish a functioning OSH committee. Hold regular OSH committee meetings.	Facility has records of OSH assessment on a monthly basis. Records were not shown to auditor by mistake on last assessment.	2
Jul-18	Occupational Safety and Health	OSH Management Systems	The factory has a written OSH policy which is not signed by top management.	Consult workers representative in any change related to OSH policy.	The factory has an OSH policy signed by top management. Workers representative will be informed of any changes of the OSH policy.	2
Jul-18	Occupational Safety and Health	Chemicals and Hazardous Substances	The inventory does not include all the hazardous substances used in the workplace.	Keep an inventory that includes all chemicals used in the workplace.	All chemical used at the facility are included in the chemical inventory. KCC paint and EYB 143 won't be at the chemical inventory as the factory does not use it anymore. They will be removed from the chemical warehouse.	2
Jul-18	Occupational Safety and Health	Chemicals and Hazardous Substances	Unidentified containers	Label all contained used in the workplace. Train relevant workers on chemical handling.	Facility ensure to have all chemical containers properly labeled.	16
Jul-18	Occupational Safety and Health	Chemicals and Hazardous Substances	No MSDSs were available in the mechanic shop of building 34 were chemicals are used such as solvent (K7M).	Ensure that the MSDS are available for all the chemicals and hazardous substances used in the workplace.	All MSDS for the chemical used at the factory are available at the work station.	26
Jul-18	Occupational Safety and Health	Chemicals and Hazardous Substances	No eye wash station in the mechanic shop of building 34 where chemicals and hazardous substances are used.	Ensure washing facilities are available in the area where chemicals and hazardous substances are used.	An eye wash station wont be installed at the mechanic shop. facility will look for an alternative solution to this matter.	2

Jul-18	Occupational Safety and Health	Worker Protection	Missing pulley guards.	Provide all the machines with the necessary guards.	Facility will do a general inspection on sewing machines in order to ensure that all moving part are properly covered.	26
Jul-18	Occupational Safety and Health	Worker Protection	One uncovered electrical panel with exposed wires in the mezzanine of building 34. In the generator room the batteries terminals were missing insulation covers.	Maintain the electrical installations regularly. Ensure the electrical installation remain unobstructed.	The electrical panel with exposed wires in B C Grades (mezzanine) of building 34 was properly covered.	16
Jul-18	Occupational Safety and Health	Worker Protection	One electrical panel found missing appropriate safety warnings.	Post hazard sign on all electrical panel.	Facility will ensure to properly sign the electrical control panel at the mezzanine.	16
Jul-18	Occupational Safety and Health	Working Environment	The level of lighting in the workplace is unacceptable in the two sections.	Ensure that the level of lighting comply with the Better Work recommendations.	Facility goes beyond Better Work recommendations of lux for all the working sections. Internal audits are performed regularly to ensure that the light level level is appropriate.	16
Jul-18	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets for women.	Ensure to have an adequate number of toilets. With its current workforce, the factory should have 47 functioning toilets for women.	Factory does not have any plans for installing additional toilets.	81
Jul-18	Occupational Safety and Health	Health Services and First Aid	The factory does not provide systematic health checks to workers within the first three months of hiring.	Arrange health checks for workers within the first three months of hiring.	HR Manager was properly trained. Systematic health checks to workers will be provide within the first three months of hiring.	81
Jul-18	Occupational Safety and Health	Health Services and First Aid	Insufficient number of onsite medical staff.	Ensure to have a permanent onsite medical staff of 4 nurses and 3 doctor's visits per week.	Factory does not have plans to increase medical staff.	81
Jul-18	Occupational Safety and Health	Health Services and First Aid	The employer did not provide a sufficient number of readily accessible first aid boxes/supplies in the workplace.	Ensure that the first aid box are inspected on a regular basis. Replace expired products.	Expired products such as Pro-Dovidine in 2 first aid boxes were removed immediately. Facility will ensure to inspect all first aid kits on a weekly basis. This issue was corrected during the assessment.	2
Jul-18	Occupational Safety and Health	Emergency Preparedness	One fire extinguisher with low pressure in the material warehouse. Also one overcharged fire extinguisher near the cutting area.	Ensure that the fire-fighting system are maintained on a regular basis.	Management will ensure to have all fire extinguisher properly charged.	2
Jul-18	Occupational Safety and Health	Emergency Preparedness	The evacuation plan is not updated.	Upgrade the evacuation plan accordingly. Ensure that mezzanine is included with indication of escape routes for it.	A separate evacuation plan was drawn for the mezzanine.	16
Jul-18	Working Time	Regular Hours	The factory's working hours for all shifts including break time were not posted by the employer.	Post the working time including break time inside the workplace.	Facility will ensure to have the working time including break time posted inside the workplace.	16
Jul-18	Working Time	Leave	The policy on the breastfeeding break is not fully applied.	Ensure that the break for breastfeeding are applied systematically.	HR Manager was properly trained. When returning from maternity leave, female workers are entitled to 1 hour per day to breastfeed. A contentment form is signed as evidence of their will.	2

Feb-17	Compensation	Overtime Wages	Workers are entitled to a 1 hour break period. However, in practice workers only receive a 30-minute break.	Provide one hour break as indicated in the internal work rules.	Lunch break time is being respected, factory posted some signage to let workers know about one hour break for lunch.	
Feb-17	Compensation	Overtime Wages	Night shift payment.	Pay night shift accordingly.	Facility made all the necessary adjustment on the payroll in order to properly compensate overtime work at night shift. The correct payment can be verify upon the night shift re-opens.	
Feb-17	Compensation	Paid Leave	Payments for non-working holidays are based on the minimum wage instead of average earnings.	Pay the legally mandated holiday on an average earnings.	The payroll system has already been changed, so that the non-worked holidays are paid based on the average earnings..	
Feb-17	Compensation	Paid Leave	Payments for weekly rest days are based on the minimum wage instead of average earnings.	Pay weekly rest day on an average earnings.	The payroll system has already been changed, so that the non-worked holidays are paid based on the average earnings.	
Feb-17	Compensation	Social Security and Other Benefits	The factory did not pay the required employer contribution to ONA for the workers in the printing building . The contribution to ONA for Buildings 34 and 35 is calculated based on the minimum wage.	Pay ONA accordingly for all workers that have been working at the factory for more than three months.	The required employer contribution to ONA for the workers in the printing building has already been paid.	
Feb-17	Compensation	Social Security and Other Benefits	No contribution is collected from workers in the printing building.The contribution to ONA for Buildings 34 and 35 is calculated based on the minimum wage.	Collect and forward workers' contribution to ONA.	The contribution to ONA for all Willbes factories is now being calculated using the base salary. And contribution is now being collected from workers in the printing building.	
Feb-17	Compensation	Social Security and Other Benefits	The factory is not registered with OFATMA for maternity and health insurance.	Register with OFATMA for maternity and health insurance.	The factory is registered with OFATMA for maternity and health insurance since September 2017.	
Feb-17	Compensation	Social Security and Other Benefits	The factory is not registered with OFATMA for maternity and health insurance.	Register with OFATMA for maternity and health insurance. Collect and forward workers' contributions to OFATMA.	The factory is registered with OFATMA for maternity and health insurance from September 2017.	
Feb-17	Contract and Human Resources	Termination	2 termination files improperly documented.	Ensure to document properly in workers' files any relevant information relating to their employment contract.	Human Resources Manager has been warned and re-trained to perform his duties properly going forward. Periodical reviews are being conducted to make sure this does not happen in the future.	
Feb-17	Contract and Human Resources	Termination	MAST notification is missing prior to the temporary suspension of work at the printing building in 2017.	Send a notification to Ministry of Labor to justify the temporary suspension of work.	The Print Shop manager has been explained and trained already. Temporary suspensions will be notified to the Labor Office when reducing the workforce.	
Feb-17	Contract and Human Resources	Dialogue, Discipline and Disputes	Inadequate language from line supervisors.	Provide supervisory skill training for supervisors. Establish disciplinary measures for persistent offenders. Management informed the supervisors of possible sanctions for verbal abuse.	Supervisors from all Willbes Haiti factories received the training on supervisory skills.	

Feb-17	Occupational Safety and Health	OSH Management Systems	The employer does not submit the records to OFATMA on a monthly basis.	Submit to OFATMA on a monthly basis records on work-related accidents and diseases.	The factory submits the accidents report every month.	
Feb-17	Occupational Safety and Health	Chemicals and Hazardous Substances	2 unidentified propane and gas tanks in the printing building.	Label all dangerous substances. Post warning near the gas tanks. Store properly any source of ignition.	The gas tank have warning signs. Identification is placed.	
Feb-17	Occupational Safety and Health	Chemicals and Hazardous Substances	No MSDS' were available in the storage warehouse in the printing building.	Ensure that MSDS' are available in the storage warehouse in the printing building.	MSDS for all chemicals are available in the storage warehouse at the Print Shop.	
Feb-17	Occupational Safety and Health	Worker Protection	All of the single needle machines were missing finger guards.	Ensure that machines have their necessary guards. Train the maintenance team on Occupational safety and Health issues.	All single needle machines were provided with finger guards. Sewing machine operators will be trained on the mandatory use of them as to comply with our internal rules.	
Feb-17	Occupational Safety and Health	Worker Protection	1 electrical panel in Building 34 was blocked by cardboard boxes.	Ensure to keep electrical equipment away from flammable material. Have a weekly inspection tour to address punctual issues.	This issue was corrected during the factory assessment and employees working on that area were warned and re-trained to keep the electric panels free of obstacles.	
Feb-17	Occupational Safety and Health	Working Environment	The temperature exceeds the recommended 30 C in Quality ,Packing, Pressing and Cutting sections.	Ensure to maintain the temperature to a maximum of 30 C in all sections.	Building 35 is under repair. The factory has started the installation work of a cooling system.	
Feb-17	Occupational Safety and Health	Working Environment	The light levels are inadequate in Cutting and Packing sections.	Improve the lighting level to a minimum of 500 lux in packing and pressing sections.	The factory did an inspection of electrical installations to replace non functioning lights.	
Feb-17	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets for women.	Build additional toilets for men and women.	The factory is committed to build more toilets.	
Feb-17	Occupational Safety and Health	Welfare Facilities	No soap in the toilets.	Ensure that soap is available in the restroom for the workers.	This issue was corrected during the factory assessment; janitorial employee & supervisor were warned to keep the toilets provided with hand soap at all times.	
Feb-17	Occupational Safety and Health	Health Services and First Aid	No medical checks were arranged for newly hired workers within the first three months of employment.	Arrange a medical check for workers within their first three months.	All mandatory medical checks for all Willbes factory workers have been scheduled already. The plan will take around 4 months. Additional checks are being requested to OFATMA as well.Also,the factory changed the doctor's contract to full-time and started with the medical checks.	
Feb-17	Occupational Safety and Health	Health Services and First Aid	No periodic medical checks were arranged for workers who have been exposed to work-related hazards.	Arrange at least two medical check a year for workers who have been exposed to work-related hazards.	All mandatory medical checks for all Willbes factory workers have been scheduled already. The plan will take around 4 months. Additional checks are being requested to OFATMA as well. Also,the factory changed the doctor's contract to full-time and started with the medical checks.	

Feb-17	Occupational Safety and Health	Health Services and First Aid	Annual medical checks were not provided to all workers.	Arrange, at least, one medical check a year for all the workers.	All mandatory medical checks for all Willbes factory workers have been scheduled already. The plan will take around 4 months. Additional checks are being requested to OFATMA as well. Also, the factory changed the doctor's contract to full-time and started with the medical checks.	
Feb-17	Occupational Safety and Health	Health Services and First Aid	Insufficient number of onsite medical staff.	Comply with the Haitian law regarding the onsite medical staff.	Facility has a new clinic on site.	
Feb-17	Occupational Safety and Health	Emergency Preparedness	The emergency escape routes in Building 35 have not been marked according to the newly arranged floor layout.	Mark emergency escape routes accordingly to the new layout of the building. Ensure that the evacuation map is adapted to the new layout.	The emergency escape routes in Building 35 were marked according to the newly arranged floor layout.	
Feb-17	Working Time	Regular Hours	Workers are entitled to a daily break of 1 hour, however, the actual break period is for 30 minutes instead.	Provide one hour break to workers. Ensure that pregnant women are aware of their additional breaks. Post messages of their additional breaks throughout the floor and in the clinic room.	Willbes Internal Rules are being respected. Factory re-open at 12:15 p.m. so employees are able to take their lunch break in full. The working hours are displayed on prominent areas of the factory, including the eating area so workers are aware. Both factory's Production & HR managers have been re-trained to implement and follow up. Also, the pregnant women employed at the factory are aware of their rights to take two additional breaks of half hour each.	
Feb-17	Working Time	Regular Hours	Prior authorization was not obtained from the Department of Labor before working at night in the printing building.	Ensure to obtain the authorization from the Department of Labor before using overtime.	The authorization letter has been sent to the Labor Office. They sent it signed back to the factory without the stamp. After the audit, the factory resent the later to get the stamp.	
Feb-17	Working Time	Overtime	Excessive overtime for workers in the printing building.	Ensure to not exceed the legal limits of overtime.	The compliance team informed the production units of the legal limit of 80 hour by trimester. Workers in the printing building no longer work overtime.	
Feb-17	Working Time	Overtime	Workers are entitled to a 1 hour break period. However, in practice workers only receive a 30-minute break.	Provide one hour break to workers accordingly to the internal rules.	Willbes Internal Rules are being respected. Factory re-open at 12:15 p.m. so employees are able to take their lunch break in full. The working hours are displayed on prominent areas of the factory, including the eating area so workers are aware. Both factory's Production & HR managers have been re-trained to implement and follow up.	

As a partnership between the International Labor Organization and the International Finance Corporation, a member of the World Bank Group, Better Work brings together various groups - governments, global brands, plant owners, trade unions and workers - to improve Work in apparel industry and make the sector more competitive.

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