

Better Work Haiti: Garment Industry

6th Biannual Synthesis Report Under the HOPE II

Legislation

Produced on 16 April 2013

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List of Acronyms

ADIH	<i>Association des Industries d'Haïti</i>
CATH	<i>Centrale Autonome des Travailleurs Haïtiens</i>
CFOH	<i>Confédération des Forces Ouvrières Haïtiennes</i>
CNOHA	<i>Centrale Nationale des Ouvriers Haïtiens</i>
CODEVI	<i>Compagnie de Développement Industriel</i>
CP	Compliance point
CSH	<i>Coordination Syndicale Haïtienne</i>
CTH	<i>Confédération des Travailleurs Haïtiens</i>
CTMO-HOPE	<i>Commission Tripartite de Mise en œuvre de la loi HOPE</i> (Tripartite HOPE Commission)
EA	Enterprise Advisor
HELP	Haiti Economic Lift Program
HOPE	Haitian Hemispheric Opportunity Through Partnership Encouragement
ITUC	International Trade Union Confederation
MSDS	Material Safety Data Sheet
MOISE	<i>Mouvement des Organisations Indépendantes Intégrées aux Syndicats Engagés</i>
MAST	<i>Ministère des Affaires Sociales et du Travail</i> (Ministry of Labour and Social Affairs)
OFATMA	<i>Office d'Assurance de Travail, de Maladie et de Maternité</i> (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
PICC	Performance Improvement Consultative Committee
PPE	Personal protective equipment
SC/AFL-CIO	Solidarity Center/American Federation of Labour - Congress of Industrials Organisations
TAICNAR	Technical Assistance Improvement and Compliance Needs Assessment and Remediation
USDOL	United States Department of Labor

Section I: Introduction and Methodology

1.1 Structure of the report

This is the sixth report to be produced by Better Work Haiti in the framework of the HOPE II legislation. The objective of the report is to describe the labour compliance performance of factories participating in the Better Work Haiti programme, including changes in compliance with international labour standards and with national labour law since the publication of the “1st Biannual Report under the HOPE II Legislation” published on 19 October 2010.

The first section of this report gives an overview of the HOPE II legislation and the origin of the Better Work programme in Haiti. This section also includes an explanation of the Better Work methodology, including the reports produced in the framework of the Better Work programme and the HOPE II legislation.

The second section of the report outlines the compliance assessment findings from the sixth round of factory assessments conducted between October 2012 and February 2013.

The third section of the report describes Better Work Haiti advisory and training services in the period from August 2012 to February 2013.

The fourth section of the report outlines the priorities of the Better Work Haiti programme in the upcoming months. Finally, the last section of the report describes the efforts made by the factories to correct the compliance needs identified in the Better Work Haiti compliance assessments. As required by the HOPE II legislation, information provided for each of the participating factories includes: compliance deficiencies for each compliance cluster and each compliance point; details of non-compliance; improvement priorities; efforts made by the factory to remedy the compliance needs as verified in the sixth assessment visit; and with respect to non-compliance areas that have not been remediated, the amount of time that has elapsed since the non-compliance was first reported publicly.

1.2. Context

The HOPE II legislation and the TAICNAR project

In 2006, the United States Congress enacted the Haitian Hemispheric Opportunity through Partnership Encouragement Act (HOPE) Act to provide duty-free entry to the United States for garments manufactured in Haiti. Two years later, in 2008, the US Congress passed the HOPE II legislation, which expanded duty-free access and established a new programme for strengthening and monitoring working conditions in the textile and garment sector through the ILO (the Technical Assistance Improvement and Compliance Needs Assessment and Remediation program – TAICNAR). On 24 May 2010, the Haiti Economic Lift Program of 2010 (HELP Act) was signed into law, expanding the Caribbean Basin Economic Recovery Act and the Haitian Hemispheric Opportunity through Partnership Encouragement Act of 2008 (Haiti HOPE II) to contribute to Haiti’s economic growth and development. Among its provisions, the HELP Act extended the HOPE trade preference program until 2020, and expanded the tariff preference level limits for knit and woven apparel.

The HOPE II legislation allows for duty-free entry into the United States for a limited number of garments imported from Haiti, provided that 50% of the value of the goods and/or the costs of processing the garments originates in Haiti, the United States, or another country that has a free-

trade agreement with the United States. This percentage increases to 55% of the value of the goods and/or the costs of processing the garments originates in Haiti in the fourth year and 60% in the fifth year of HOPE II implementation.

In order to benefit from HOPE II/HELP, Haiti was required to establish an independent Labour Ombudsperson 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 International Labour Office (ILO), to develop a programme to assess and promote compliance with core labour standards and national labour law in the factories that are eligible for tariff advantages under HOPE II. This was referred to in the legislation as the *Technical Assistance Improvement and Compliance Needs Assessment and Remediation* (TAICNAR) programme. Finally, Haiti needed to develop a mechanism for ensuring that all producers benefiting from the HOPE II trade preferences participated in the TAICNAR programme.

There are two components to the TAICNAR programme. The first of these 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 labour inspectors, judicial officers and other government personnel. The second element of the TAICNAR programme focuses on assessing compliance with core labour standards and national labour law, supporting remediation efforts, and publicly reporting on the progress of each factory on the Labour Ombudsperson's register.

The Haitian Hemispheric Opportunity through Partnership Encouragement Act of 2008 (HOPE II) requires the President of the United States to identify "whether a producer [...] has failed to comply with core labor standards and with the labor laws of Haiti that directly relate to and are consistent with core labor standards¹." The statute requires the President to consider the reports from the TAICNAR program in making these identifications. The President "shall seek to assist" any non-compliant producers "in coming into compliance with core labor standards" and with directly related Haitian labor laws that are consistent with those standards. "If such efforts fail, the President shall withdraw, suspend, or limit the application of preferential treatment [...] to articles of such producer."²

Better Work Haiti, which is a partnership of the ILO and the International Finance Corporation, is implementing the TAICNAR programme in collaboration with the HOPE Commission, a presidential tripartite commission comprising three members of the Haitian government, three members of the Haitian private sector and three members of national workers' organizations. It is supervised by a President and guided by an Executive Director and a consultant. Since August 2011, the HOPE Commission has served as Better Work Haiti's Project Advisory Committee.

Recent Developments

In January 2013, a new Minister, Mr Charles Jean-Jacques, was appointed at the Ministry of Labour and Social Affairs (MAST). Mr Jean-Jacques has been the Director General of the Haitian Office for Work, Health and Maternity Insurance (OFATMA) for the past five years and has been very supportive of the Better Work Haiti programme, particularly with sending medical staff to factories

¹ HOPE II Legislation 19 U.S.C. § 2703a(e)(4)(B)(i)

² HOPE II Legislation 19 U.S.C. § 2703a(e)(4)(B)(ii).

to perform medical exams as prescribed in the labour law and participating actively in the OSH event annually.

Fulfilling the statute's requirement, the President of the Republic of Haiti appointed Mrs. Josseline Colimon Féthière as the Labour Ombudsperson on 3 April 2012. Mrs. Féthière has attended mediation training in the U.S. and has mediated many cases in the sector since her appointment. Better Work Haiti has held meetings with Mrs. Féthière and the national stakeholders in an attempt to improve coordination among the various entities involved in implementing the HOPE II legislation. In particular, a note regarding the process for handling complaints in relation to the office of the Special Labour Ombudsperson and the Regional Office of MAST was developed. The note is available in Creole, French and English. Solidarity Centre/AFL-CIO printed the note as a poster, which was distributed in all the factories. The process is described in Annex 2.

Freedom of association in the Haitian garment industry

Since the previous report of October 2012, seven new unions have been created and have received attestation from the Ministry of Labor and Social Affairs. At the beginning of 2013, 50% of Haitian apparel factories had a union presence. This new situation in the garment industry in Haiti, particularly in the factories of the capital, impacts considerably the context in which Better Work Haiti evaluates and promotes social dialogue. Given the history of distrust between workers and employers with regard to the labour movement, there continues to be problems regarding the treatment and termination of union members, and particularly, union leadership. Better Work Haiti is monitoring these situations closely and reporting on them in the on-going assessment cycles. Furthermore, since the beginning of 2012 trade unions are sharing information and issues regularly with Better Work Haiti, and this information is being taken into consideration during factory assessments. The unions are also regularly contacting the Labour Ombudsperson to request her intervention in labour issues.

Since fall 2012, the Haitian labour movement has benefitted from the support of two international trade union organizations, namely Solidarity Centre/AFL-CIO and the International Trade Union Confederation (ITUC). ITUC is mainly working with their Haitian affiliates, *Confédération des Travailleurs Haïtiens* (CTH) and *Confédération des Travailleurs Haïtiens* (CSH) (both members of the CTMO-HOPE) and *Confédération des travailleurs des secteurs public et privé* (CTSP), a public service union. Solidarity Centre/AFL-CIO is primarily assisting the unions in the apparel sector.

Social Dialogue

The social dialogue roundtable created by representatives of the employers, unions, government, ILO and Better Work Haiti in July 2012 creates a space for exchange, consultation and negotiation to harmonize relations between employers and workers' organizations. To date, the members have been focusing on establishing a memorandum of understanding that defines the terms and conditions of the roundtable. Once the MoU is completed, the social partners will appoint their representatives to a Secretariat, which will take the ownership of the roundtable.

Minimum wage

On 1 October 2012, the minimum wage in the apparel sector increased for the second time in accordance with the graduated increases called for under the 2009 minimum wage law. The minimum wage of reference increased from 150 to 200 gourdes, and the benchmark for setting piece rate wages increased from 200 to 300 gourdes. Three years after this law was voted for, it is still subject to different interpretations. The Haitian government is collaborating with the CTMO-HOPE and all interested parties to put in place a national reference system to calculate the production

quota. This system will be based on productivity and efficiency criteria in line with international norms.

Labour law reform

The Haitian labour law adopted by the legislature in 1984 is not always consistent with fundamental labour standards, including those ratified by Haiti, which have the status of law under the Haitian Constitution. This has created a conflicting set of rules, leading to confusion among government officials, workers, and producers and impairing the labour inspectorate's ability to ensure compliance. In 2010, the Government of Haiti requested the assistance of the ILO to assist the tripartite constituents in the revision of the law. With the support from Canada, a consultative process to produce a first draft of a new labour code was initiated. With the support of an international labour law expert, the constituents' groups prepared a draft reform proposal. In March 2013, a tripartite meeting was organized to discuss a synthesis document of these proposals. It aimed at sharing the proposals formulated by each group with all actors involved in the reform of the labour law and laying the foundations of a constructive social dialogue. Once the synthesis document is endorsed by the social partners, a second tripartite meeting will be held to discuss the final draft of the law to be submitted to Parliament.

1.3. The Better Work compliance assessment methodology

Better Work compliance assessment framework

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

Core labour 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 labour, the abolition of child labour 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 programmes 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 labour 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.

National labour law: The remaining four clusters refer to standards set in national legislation, and therefore vary from one country to another. These categories cover compensation, contracts and human resources, health and safety at work and working time.

Each of the eight categories is divided into key thematic components called "compliance points" (CPs). These thematic subsections remain the same for assessments in all country programmes. However, each compliance point comprises specific questions, which may vary from one country to another. The detailed list of compliance points for each of the clusters is shown in Table 1.

The compliance assessment tool includes internal guidance notes that indicate the applicable legal standard by which to evaluate compliance. Where legal standards do not provide sufficient clarity to assess compliance, internal guidance has been developed to ensure consistency in reaching compliance decisions.

Table 1: Better Work compliance assessment framework

	Compliance clusters		Compliance Points
Core Labour Standards	1	Child labour	1. Child Labourers 2. Unconditional Worst Forms 3. Hazardous Work 4. Documentation and Protection of Young Workers
	2	Discrimination ³	5. Race and Origin 6. Religion and Political Opinion 7. Gender
	3	Forced Labour	9. Coercion 10. Bonded Labour 11. Forced Labour and Overtime 12. Prison Labour
	4	Freedom of Association and Collective Bargaining	13. Union Operations 14. Interference and Discrimination 15. Collective Bargaining 16. Strikes
Working Conditions	5	Compensation	17. Minimum Wages 18. Overtime Wages 19. Premium Pay 20. Method of Payment 21. Wage Information, Use and Deduction 22. Paid Leave 23. Social Security and Other Benefits
	6	Contracts and Human Resources	24. Employment Contracts 25. Termination 26. Discipline and Disputes 27. Contracting Procedures
	7	Occupational Safety and Health	28. OSH Management Systems 29. Chemicals and Hazardous Substances 30. Worker Protection 31. Working Environment 32. Health Services and First Aid 33. Welfare Facilities 34. Worker Accommodation 35. Emergency Preparedness
	8	Working Time	36. Regular Hours 37. Overtime 38. Leave

Calculating non-compliance

In public synthesis reports, Better Work reports on aggregate 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 main labour standards clusters. A factory is found non-compliant in a subcategory if they are found to be out of compliance on any one aspect of it. With respect to the figures

³ 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 labour 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 labour law does not identify grounds for discrimination beyond those cited in Conventions 100 and 111.

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 non-compliance rate is not sufficient to fully describe the specific issues that Enterprise Advisors have observed during the assessments. Tables presenting non-compliance findings at a more detailed level are also presented in Section II (see “In Focus” tables). These tables allow the reader to fully appreciate specific challenges in compliance identified in factory assessments. In Focus tables report the number of factories found to be non-compliant with respect to each highlighted question.

Better Work and public reporting

The Better Work programme supports fair and transparent public reporting. In all Better Work country programmes, synthesis reports on the industry are prepared on the basis of the individual factory assessment reports and published twice a year. 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.

In July 2010, Better Work Haiti published an initial compliance synthesis report, which featured aggregated compliance information based on factory assessments conducted by the programme between October and December 2009. In October 2010, Better Work published its first Biannual Report under the HOPE II legislation, the first report produced under the requirements of the legislation (see Annex 1). Subsequently, Better Work Haiti has produced the second (April 2011), third (October 2011), fourth (April 2012) and fifth (October 2012) Biannual Reports, as required by the HOPE II legislation.

The current report includes aggregated industry compliance data, as well as detailed factory-level analysis of compliance needs, priorities for remediation identified by the factory and efforts actually made to remedy compliance needs.⁴

Limitations in the assessment process

The factory-level assessments carried out by Better Work Haiti follow a thorough checklist of 248 questions covering the abovementioned labour standards. Information is gathered through a variety of sources and techniques, including document review, observations on the shop floor, and interviews with managers, workers and union representatives.

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). Interviews are conducted in Creole, the primary language of the workers. Given the cultural and political history in Haiti, which has seen considerable instability, many workers feel uneasy about sharing information on their workplaces with people who are not well known to them. This has affected somewhat the methodology of conducting onsite interviews with workers in Haiti. Nevertheless, after six assessments conducted over several years, Better Work Haiti EAs have become more experienced at collecting information and interviewing workers, and they have succeeded in creating an environment where workers are more comfortable discussing working conditions.

⁴ Reports produced under the HOPE II legislation differ in two ways from Better Work public reporting elsewhere: they include (1) factory names and compliance information from the first assessment (other Better Work country programmes name factories after one year of engagement and two assessments); and (2) more details on compliance needs and factory remediation efforts.

The detailed factory assessment reports are based on all the information collected during the assessment visit. Each factory is given seven working days before the report becomes official to provide feedback that may in some cases impact the final report language.

Since the compliance assessment tool was adapted to the Haitian context, periodic revisions have been undertaken to ensure accuracy and clarity of both questions and guidance notes. Following the changes made in the compliance assessment tool in 2012, a new version was presented to MAST for review. MAST comments and feedback will soon be presented to the Better Work Haiti Project Advisory Committee (i.e., the CTMO-HOPE) for discussion and validation.

Among the issues covered in Better Work's compliance assessment tool, sexual harassment is one of the most sensitive and most difficult to detect during factory assessments. It is often unreported due to fear of retaliation, power imbalance between victim and perpetrator, and lack of resources. UN agencies and Haitian women's NGOs have addressed sexual violence, particularly in the camps created for internally displaced people following the 2010 earthquake, but, to date, limited attention has been given to sexual harassment, even though anecdotal reports and workers survey results indicate that it is a concern. As a result, the assessment of sexual harassment in the workplace by Better Work Haiti is likely to underreport the extent of its occurrence.

Finally, assessing compliance with freedom of association in Haiti presents some challenges, especially given the context of the emerging unions in the factories. On the one hand, as unions were not present in the factories for the past decades, workers (particularly younger ones) are unaware of the unions and their role in the workplace. On the other hand, some workers reported that in the past years, co-workers who wanted to join or had joined a union were dismissed. To date, despite the growing number of unions in the sector, trade union density remains rather low and not always official, as unions, with the exception of SOKOWA, do not normally request dues from members.

Section II: Findings

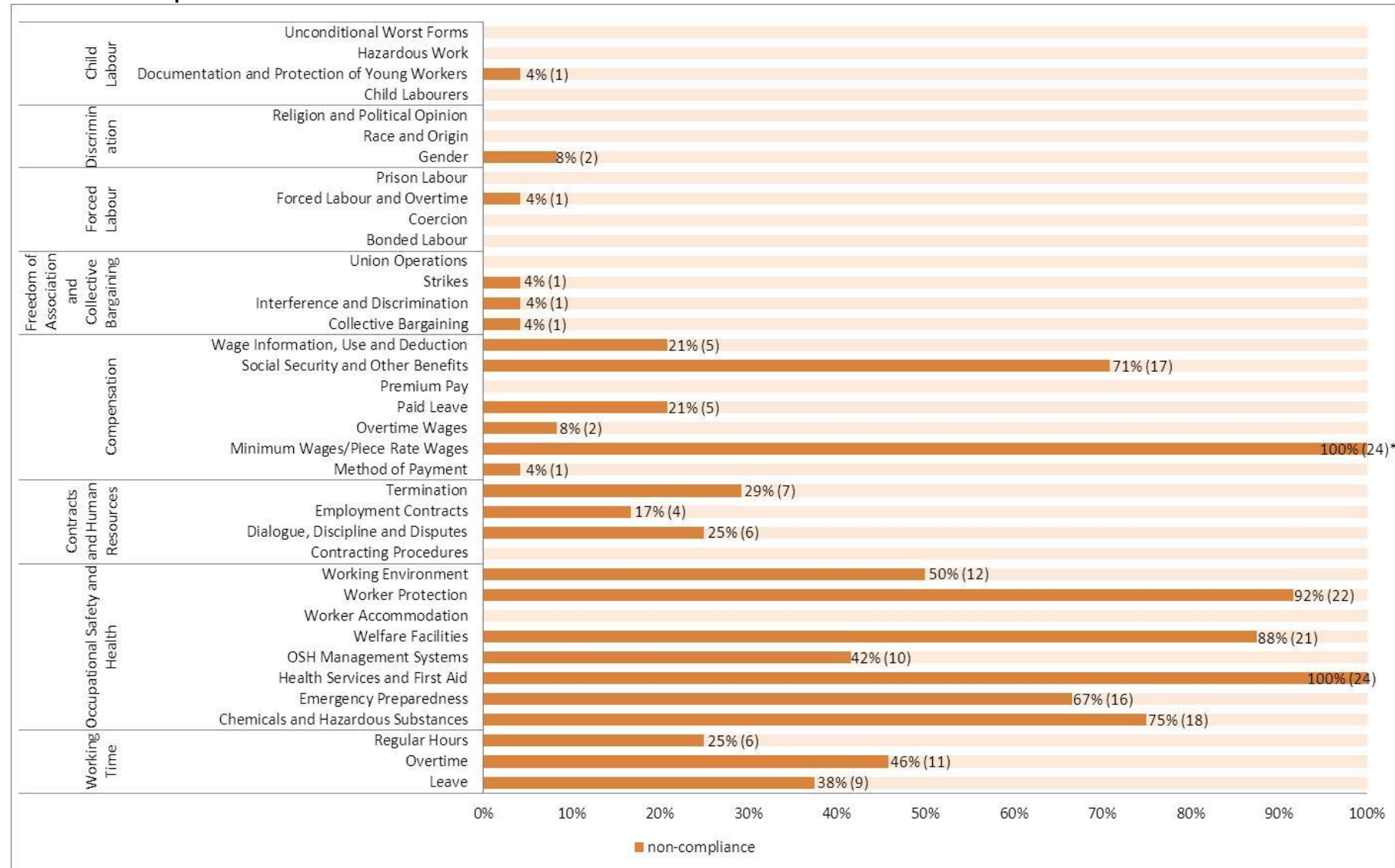
2.1. Compliance Assessment Findings (6th round of assessments)

Non-compliance rates

Chart 1 presents non-compliance findings for the 24 assessed factories in Haiti, showing non-compliance rates as well as the number of factories in non-compliance in brackets.

Key findings are provided in the detailed findings below.

Chart 1: Non-compliance rates³



³ A factory is found non-compliant in a compliance point if it is found out of compliance on any one aspect of it.

* There are two minimum wage requirements in exporting apparel factories: the minimum wage of reference and the production wage. One factory is non-compliant with payment of the minimum wage of reference of 200 Gourdes per day. All 24 factories are non-compliant with the requirement to set the piece rate incentive wage at a level such that workers can earn at least 300 Gourdes per day for ordinary hours of work. In the reporting period, an average of 16% of experienced piece-rate workers (not including newly recruited workers, those on new machines, and less qualified workers) reach 300 Gourdes per day for ordinary hours of work.

2.2. Detailed Findings

1. Core labour standards

A. CHILD LABOUR

In one factory, the employer did not have a system in place to verify the age of workers prior to hiring, i.e. the factory does not require a birth certificate or the national identification card to verify the age of the workers.

B. DISCRIMINATION

There were two findings under Discrimination relating to Gender. In one factory, sexual harassment was found. After the previous two assessments by Better Work Haiti, which also found non-compliance for sexual harassment, management implemented a policy on sexual harassment that is posted in the workplace. Also, both management and workers confirmed that several meetings were organized with all the supervisors and workers to inform them about the policy, the procedure to report sexual harassment incidents and the investigation process. Management also indicated not having received any complaint about this issue since workers were informed about the new policy in place. Although management has taken important steps to address this issue, sexual harassment continues to be an issue for a number of workers in the factory.

In another factory, the employer required pregnancy tests as a condition of employment. Better Work Haiti Enterprise Advisors found copies of pregnancy tests in workers' files.

C. FORCED LABOUR

There was one finding under the Forced Labour and Overtime CP related to one employer forcing workers to work more than 80 hours of overtime per trimester by threatening dismissal or other action that would reduce their future income. The factory's daily work schedule includes two hours of overtime. Workers reported that they are not allowed to leave the workplace if they do not reach their quota. They are also subject to sanctions if they refuse to work overtime, such as being suspended or even terminated. During the assessment, EAs also found a note posted by management on the floor saying that no one is allowed to leave the workplace before 5:10 p.m.

D. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

As in previous reports, there is one non-compliance finding under Collective Bargaining referring to the only factory in Haiti with a collective bargaining agreement (CBA). The non-compliance finding is due to a failure to implement certain provisions of the CBA in force, particularly referring to medical services and the provision of space for food vendors.

There is a 4% non-compliance rate in Interference and Discrimination. This refers to one factory where the employer tried to interfere with and manipulate the union. Shortly after receiving a letter informing the management that a union was formed in the factory, management repeatedly called the union officials to several meetings to discuss the dissolution of the union and to ask them to sign related documents. The factory managers acknowledged that they were involved in the documentation process (union dissolution documents) and stated that they only wanted to help the workers who had requested their assistance. Six workers who did not wish to resign from the union

said that four other workers resigned after being pressured by management. They also mentioned that all the documentation was prepared by management, and that they were requested to sign a document that contained only their names, so it was not clear what they were signing.

One non-compliance in Strikes relates to a strike that took place in May 2011, which was covered in previous Biannual Reports (October 2011, April and October 2012). Although the events underlying the non-compliance—the termination of some 140 workers for their participation in a strike declared illegal by MAST—did not recur, Better Work Haiti continued to find non-compliance because the employer had not taken action to address this non-compliance. According to the factory's senior management, the factory is willing to re-instate some workers. In December 2012, under the guidance of the Labour Ombudsperson, discussions have been initiated between the factory owner and Mr Fanfan Evel, a Haitian lawyer and president of AUMOHD, a Haitian NGO offering legal assistance to workers. A formal document which will specify the terms and conditions for reinstatement of workers is currently being drafted by the Labour Ombudsperson. While this indicates progress on the issue, non-compliance has still been cited since the terminations have not yet been remedied.

2. Working conditions

E. COMPENSATION

There are two applicable minimum wage requirements in exporting apparel factories in Haiti: the minimum wage of reference, currently set at 200 Gourdes per day, and the production wage, currently set at 300 Gourdes per day. The applicability of the minimum wage of reference is not clearly defined in the law, but according to guidance provided by the tripartite CTMO-HOPE, this wage is meant to ensure a base wage for newly recruited workers, for those on new machines, and for less qualified workers. The production wage refers to a legal requirement to set piece rates in a manner such that a worker can earn 300 Gourdes during 8 regular hours of work per day.

Better Work Haiti has assessed and reported on both the payment of the minimum wage (now set at 200 Gourdes per day) and on the requirements relating to the setting of the piece rates (which now must be set in a manner that allows experienced workers to earn 300 Gourdes within 8 regular hours) in the same manner from the start.

Better Work Haiti's assessment and reporting on minimum wage and the setting of piece rates is based on:

- the Law on Minimum Wage (No. CL-09-2009-010), which requires that in the exporting factories employing workers paid by the piece or by the task, the piece rate price must be set in a manner that permits a worker to earn 300 Gourdes during 8 regular hours of work. The law also provides that the minimum wage of reference is currently set at 200 Gourdes per day.
- the letter dated 19 July 2010, in which the CTMO-HOPE clarified that in exporting garment factories, the piece rate must be set in a manner that allows workers to reach the higher amount (now, 300 Gourdes), while the minimum wage is there to ensure a base wage for newly recruited workers, for those on new machines, and for less qualified workers.
- the letter dated 16 July 2010 from Prime Minister, which sets out the reference wage.

Based on those references, when determining the percentage of piece rate workers who earn at least 300 Gourdes per day, Better Work Haiti first excludes piece rate workers who have been recruited within the past 3 months, or those who have been using their equipment for 3 months or less. Then, Better Work Haiti calculates the percentage among the remaining experienced workers who earn 300

Gourdes during 8 regular hours. While all of the more experienced piece rate workers should be earning on average 300 Gourdes per day, Better Work Haiti finds compliance even if 90% of them earn this amount.

The 100% non-compliance rate in Minimum Wages is due to all 24 factories being out of compliance with setting the piece rate at a level such that workers earn at least 300 gourdes per day for ordinary hours of work (other than workers who have been recruited within the past three months, or those who have been using their equipment for three months or less). This is an issue that was noted in previous Biannual Reports. The average number of piece-rate workers currently earning 300 gourdes after eight hours of regular work time is 16%, down from 28% in the previous reporting period. One factory was non-compliant with the payment of the minimum wage of reference of 200 gourdes per day required for full-time workers who are not working on the piece rate. In this factory, Enterprise Advisors found discrepancies in the payroll records and were not able to confirm that the minimum wage of reference is paid correctly. Management acknowledged the issue and stated that they are working to improve it.

In two factories, the employers fail to pay workers 50% above the normal wage for all ordinary overtime hours worked, resulting in an 8% non-compliance rate. In one factory, workers said they perform one hour of overtime per day to meet their target, but this hour of overtime is not remunerated as such. The payroll review did not show any overtime hours performed by workers. In the second factory, workers stated that they do not understand how the overtime calculation is made. The attendance records were not reliable, because both management and workers confirmed that workers do not punch their cards. Management stated that they punch the workers' attendance cards after the work shift has started, because when workers punch their own cards it takes too much time. Management keeps a manual record to confirm when workers start and finish work. Several inconsistencies in the payment of overtime hours were observed by EAs.

The Paid Leave non-compliance rate (21%) refers to factories not paying workers for sick leave (one factory) and not paying the weekly rest day (five factories). The Haitian Labour Code states that any worker, who works 48 hours, or six consecutive days in a week, is entitled to a paid weekly rest day. Workers should therefore be paid for the full day on Sunday (with the payment calculated based on average earnings if they are piece-rate workers).

The Social Security and Other Benefits CP has a 71% non-compliance rate.

In Focus 1: Social Security and Other Benefits

Question	Number of factories out of compliance
Does the employer collect the required contribution to OFATMA from all workers?	0
Does the employer collect the required social insurance contribution to ONA from all workers?	4
Does the employer forward workers' contributions to OFATMA?	0
Does the employer forward workers' contributions to ONA?	16
Does the employer pay 3% of workers' basic salary to OFATMA for maternity and health insurance?	0
Does the employer pay 3% of workers' basic salary to OFATMA for work-related accident insurance?	7
Does the employer pay the required employer contribution to ONA?	17
Does the employer pay workers their annual salary supplement or bonus?	0

The non-compliances in the payment of employer contributions and the forwarding of workers' contributions to ONA (pension funds) relate to late payments. The employers are collecting the contribution of workers, but forwarded them to ONA together with their own contribution too late. According to Haitian legal requirements, the payment of the contribution to ONA should be made every month. In four factories, the employer does not collect the required contribution to ONA from workers. The law requires a payment of 6% of the worker's basic salary, and in these factories the percentage contributed by workers is under 6%. Because there is no functioning health insurance system in Haiti and the maternity insurance is voluntary for workers, Better Work Haiti determines compliance on the requirements related to workers' contributions based on whether the employer collects, forwards and pays contributions for workers who ask to enrol in the maternity insurance programme. Concerning the seven factories in non-compliance with OFATMA employer contributions, five factories are late in their payment while two factories do not contribute to the insurance provided by the government institution.

Wage Information, Use and Deduction has a 21% non-compliance rate. In five factories, the payrolls reviewed by EAs showed a number of issues, such as deductions not reported in the payroll, discrepancies between the amounts showed in the payrolls and those made to workers, payroll records not signed by workers, and overtime hours not reported in the payroll or not properly paid. In one factory, workers were not properly informed about their wage payments and deductions. In two factories, the employers made unauthorized deductions from wages. In one factory, management is deducting 25 gourdes when workers arrive late at work. In the other factory, workers are informed about their contribution to ONA but they did not know how much was deducted. There is one finding under Method of Payment, due to one factory not paying wages on time.

F. CONTRACTS AND HUMAN RESOURCES

The highest non-compliance rate in this cluster is in Termination (29%).

In Focus 2: Termination

<i>Question</i>	<i>Number of factories out of compliance</i>
Do workers have an opportunity to defend themselves before they are terminated based on their conduct or performance?	3
Does the employer compensate workers for unused paid annual leave when they resign or are terminated?	0
Does the employer comply with legal requirements before reducing the size of the workforce due to changes in operations?	3
Does the employer notify the labour ministry when suspending operations due to lack of materials, force majeure, or accident resulting in an immediate work stoppage?	0
Does the employer only terminate workers for valid reasons?	3
Does the employer pay judicially ordered damages for wrongful termination?	1
Does the employer pay workers their annual salary supplement or bonus upon termination?	1
Does the employer provide workers proper notice of termination when required, or pay workers during the notice period?	1
Has the employer complied with any orders to reinstate or compensate workers who were found to be unjustly terminated?	0

In three factories, workers were dismissed without having the opportunity to defend themselves. Three factories also had findings that management reduced the size of the workforce but did not inform MAST. Also in three factories, the employer terminated workers without any warnings, and no

supporting documentation showing the reasons for the terminations was available in the workers' files.

Under Dialogue, Discipline and Disputes, it was found that in four factories, disciplinary measures did not comply with legal requirements. Furthermore, in three factories, workers were bullied, harassed or humiliated. In two of these factories, workers reported that supervisors used humiliating treatment, shouting at them and using bad language, and in the other, workers reported being subjected to abusive language and having dust blown into their faces.

The Employment Contracts CP has a 17% non-compliance rate. In four factories, internal work rules were not compliant with legal requirements. Among these four factories, one factory could not provide the internal work rules approved by MAST to the EAs. In one factory management did show internal rules but these still needed to be approved by MAST, while in another one, the internal work rules stipulate 1.5 overtime hours per day for five days per week, which is the equivalent to 90 hours of overtime for a trimester. According to the Haitian Labour Code, the limit for overtime hours per trimester is 80 hours. Another factory had contracts that do not comply with the labour code, collective agreements or internal work rules. In particular, the employment contracts in that factory stipulate that workers are not provided payment for weekly rest days if their work done from Monday to Saturday totals less than 48 hours. The Haitian Labour Code stipulates that workers are entitled to a paid weekly rest day if they work 48 hours or 6 consecutive days in a week (whether more than 48 hours or not).

G. OCCUPATIONAL SAFETY AND HEALTH

As in previous public reports, this continues to be the cluster where most non-compliances have been found. The recent assessment cycle shows that, in particular, Chemicals and Hazardous Substances, Health Services and First Aid, Welfare Facilities and Worker Protection report high non-compliance rates.

In Focus 3: Chemicals and Hazardous Substances

<i>Question</i>	<i>Number of factories out of compliance</i>
Are chemicals and hazardous substances properly labelled?	13
Are chemicals and hazardous substances properly stored?	4
Does the employer have chemical safety data sheets for the hazardous chemicals used in the workplace?	13
Does the employer keep an inventory of chemicals and hazardous substances used in the workplace?	4
Does the employer provide adequate washing facilities and cleansing materials in the event of exposure to hazardous chemicals?	11
Has the employer effectively trained workers who work with chemicals and hazardous substances?	5
Has the employer taken action to assess, monitor, prevent and limit workers' exposure to chemicals and hazardous substances?	1

The non-compliance findings for chemical safety data sheets in 13 factories relate sheets that are either not available or not in a language that users can read.

In Focus 4: Emergency Preparedness

<i>Question</i>	<i>Number of factories out of compliance</i>
Are emergency exits and escape routes clearly marked and posted in the workplace?	9
Are the emergency exits accessible, unobstructed and unlocked during working hours, including overtime?	6
Are there enough emergency exits?	0
Does the employer conduct periodic emergency drills?	5
Does the workplace have fire detection and alarm system?	5
Does the workplace have adequate fire-fighting equipment?	8
Has the employer trained an appropriate number of workers to use the fire-fighting equipment?	11

Under Emergency Preparedness, eleven factories show non-compliance for not training an appropriate number of workers to use the fire-fighting equipment. In the assessment of compliance, Better Work Haiti, in line with the suggestions of the Port-au-Prince Fire Department, requires that 10% of the workforce be trained.

In Focus 5: Health Services and First Aid

<i>Question</i>	<i>Number of factories out of compliance</i>
Do workers have a medical check within the first three months of hiring and annual medical checks?	21
Do workers who have been exposed to work-related hazards receive free health checks?	9
Does the employer address safety and health risks to pregnant or nursing workers?	2
Does the workplace have required onsite medical facilities and staff?	23
Has the employer ensured there are a sufficient number of readily accessible first aid boxes/supplies in the workplace?	8
Has the employer provided first-aid training for workers?	16

Nine factories failed to provide free health checks twice per year for workers exposed to risks as required by the Haitian labour law. All but one factory are non-compliant with the provision in the Haitian Labour Code that requires one on-site nurse for factories with between 50 and 200 workers, two nurses for factories with between 200 and 500 workers and one additional nurse for every additional 200 workers in the factory. Moreover, factories with fewer than 200 workers should provide weekly doctor's visits, and factories with more than 200 workers should have permanent on-site medical services.

Similarly to training in the use of fire-fighting equipment, first-aid training is not explicitly required by law. Based on good practices and ILO recommendations, Better Work Haiti finds non-compliance with first-aid training if fewer than 10% of the workforce is trained. Sixteen out of 24 factories were found non-compliant with this minimum number of workers trained in first aid.

The non-compliance rate for OSH Management Systems is 33%. The highest non-compliance in this category is related to eight factories not performing a self-assessment of OSH issues in the factory. In six factories, the employer failed to either record work-related accidents or submit their reports to OFATMA.

In the reporting period, Better Work Haiti observed a 79% non-compliance rate in Welfare Facilities.

In Focus 6: Welfare Facilities

Question	Number of factories out of compliance
Does the employer provide workers enough free safe drinking water?	6
Does the workplace have adequate accessible toilets?	19
Does the workplace have adequate hand washing facilities and adequate soap?	10
Does the workplace have all required facilities?	0
Does the workplace have an adequate eating area?	12
Is the workplace clean and tidy?	2

Under Welfare Facilities, non-compliance in nineteen factories concerned the number of toilets required by law (one toilet for every 15 women and one toilet for every 25 men). In some cases, EAs observed during the assessment that not all toilets were well functioning. Nearly half of the factories do not consistently provide soap or adequate washing facilities. And half of the factories either did not provide workers an eating area, or in some factories where there is an eating area, such area does not accommodate all the workers. For the factories located in the Metropolitan Industrial Park and the others that are renting the buildings, these two non-compliance points (toilets and eating area) are the responsibility of the zone authority or the owners who are responsible to correct the problem.

Finally, in six factories, workers complained about the quality of the water provided.

With a 92% non-compliance rate, Worker Protection has one of the highest non-compliance rates in this report.

In Focus 7: Worker Protection

Question	Number of factories out of compliance
Are appropriate safety warnings posted in the workplace?	1
Are electrical wires, switches and plugs properly installed, grounded, and maintained?	5
Are materials, tools, switches, and controls within easy reach of workers?	0
Are proper guards installed and maintained on all dangerous moving parts of machines and equipment?	22
Are standing workers properly accommodated?	11
Are there sufficient measures in place to avoid heavy lifting by workers?	0
Are workers effectively trained and encouraged to use the personal protective equipment that is provided?	6
Are workers effectively trained to use machines and equipment safely?	10
Are workers punished if they remove themselves from work situations that they believe present an imminent and serious danger to life or health?	0
Do workers have chairs with backrests?	2
Does the employer provide workers with all necessary personal protective clothing and equipment?	10

As has been the situation in previous reports, in many cases, non-compliances in Worker Protection stem from not installing or maintaining proper machine guards on dangerous moving parts (22

factories) and from not effectively training workers in the safe use of machines and equipment (10 factories). Standing workers were not properly accommodated in 11 factories. The Haitian Labour Code requires that standing workers be provided with a chair that they may use at regular intervals. To improve working conditions and worker protection, Better Work Haiti recommends that standing workers also be provided with anti-fatigue mats and foot rests.

Under Working Environment, non-compliance findings related to inadequate lighting in certain sections were reported in nine factories. Better Work Haiti recommends a minimum of 500 Lux in the cutting, pressing, quality, sewing and packing sections. In six factories, workers reported that heat was a concern for them. The maximum temperature level recommended by Better Work Haiti is 30 °C.

H. WORKING TIME

Six factories are reported in non-compliance for exceeding the overtime legal limit, which is 80 hours per trimester, defined by MAST as a period of 13 weeks. Better Work Haiti also observed non-compliance for failure to obtain authorization from the Department of Labour to perform overtime (three factories) and to work on Sundays (one factory). Finally, in four factories, workers reported that overtime is not voluntary.

The 38% non-compliance rate in the Leave CP is due to nine factories not providing workers with the required breastfeeding breaks.

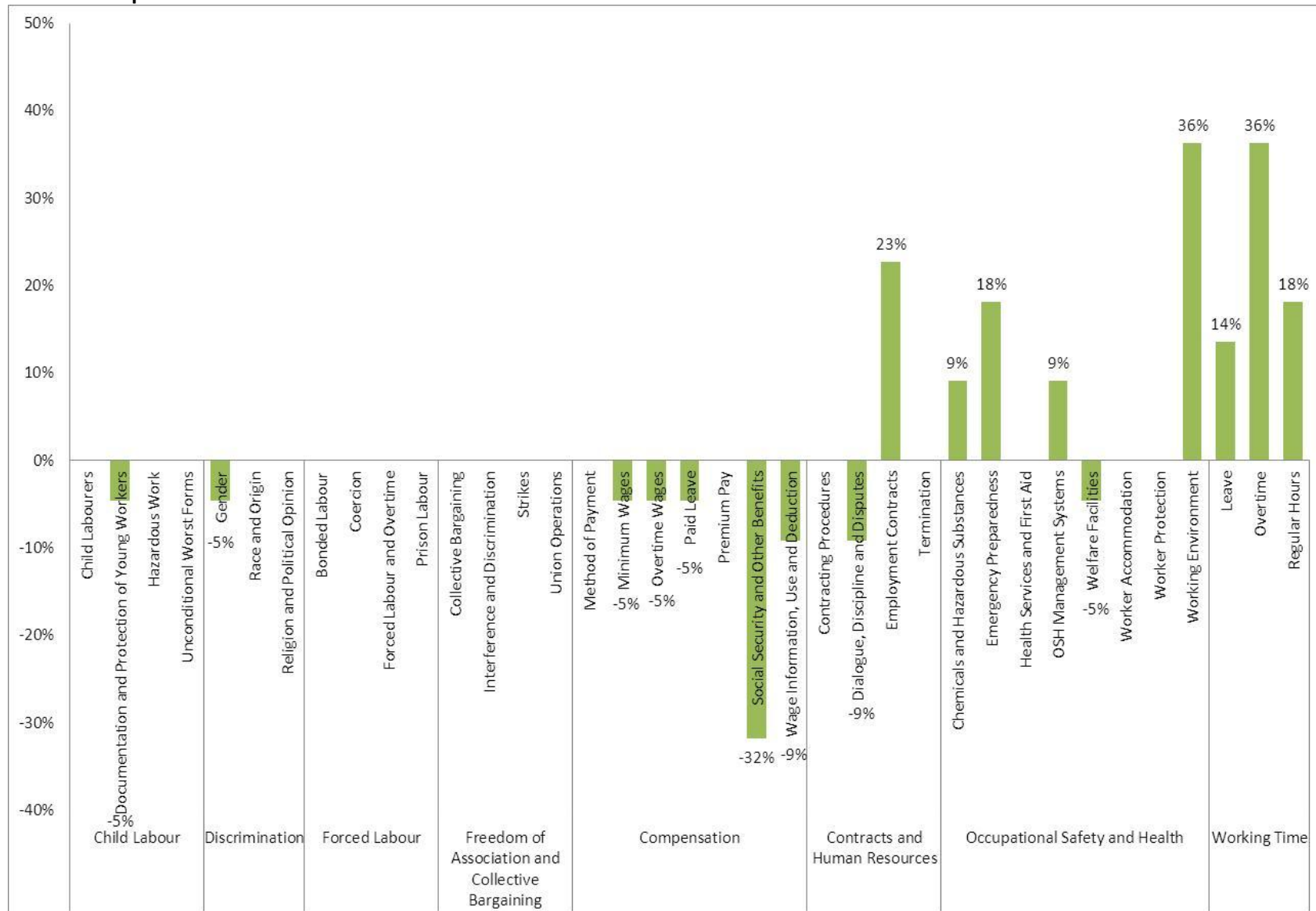
Regarding Regular Hours, in five factories the employer did not keep working time records that reflect the hours actually worked, and in two factories the employer did not comply with the daily break period.

2.3. Compliance effort

Compliance effort relates to the changes in non-compliance for each CP between the previous public synthesis report and the present one. Compliance effort refers only to the factories that were registered with Better Work Haiti in both reporting periods. It must be noted that, as the compliance effort is an aggregate indicator for all factories that have been assessed at least twice by Better Work Haiti, it is sensitive to simultaneous changes in non-compliance. For example, if a factory moves from being non-compliant to compliant and another factory that had no non-compliance findings now is non-compliant in the same CP, the two would level each other out with no change in compliance effort.

Among the 22 factories that have been assessed more than once, 11 factories improved their performance in the current reporting period. Six factories had higher non-compliance rates in this period than in the previous one, and five remained the same.

Chart 2: Compliance Effort



The 5% decline in compliance under Child Labour is due to one factory not having implemented a system to verify the age of workers.

Under Discrimination, the decline is due to a factory imposing pregnancy tests as a requirement for employment.

From Chart 2, it emerges that under Compensation, non-compliance in Social Security and Other Benefits has increased by 32% from the previous round of assessments. As mentioned in the previous public report, CTMO-HOPE and Better Work Haiti held a meeting with ONA officials, employers and unions to review the relevant legal requirements and to present the new vision and services of the institution. Shortly after that meeting, Better Work Haiti was informed that trimestral payments were only allowed if made in advance and not retroactively. Furthermore, payments to ONA had to be forwarded before the 10th of each month. This meant that 71% of factories were found to be late with their payments to ONA and therefore in non-compliance. Non-compliance rates have increased also under Minimum Wages, Overtime Wages and Paid Leave. Regarding Contracts and Human Resources, improvements in compliance have been observed especially in terms of Employment Contracts. EAs have advised factory owners and managers on revisions to their employment contracts (whether written or verbal) and on better communicating to workers the terms of their contracts. Also, EAs have advised human resources (HR) managers to align internal work rules with employment contracts. Furthermore, HR managers now better document the reasons why they are terminating workers, which had not widely been the practice.

Non-compliance has increased under Dialogue, Discipline and Disputes. This is due to three factories in which workers have reported being bullied, harassed or humiliated. Relationships between workers and line supervisors as well as with middle managers are known to experience tensions occasionally. With the workers' raising awareness trainings provided by Better Work Haiti as well as by trade unions, workers are much more aware of their rights and acceptable behaviour. Thus, when they feel behaviours are unacceptable, they are more comfortable to report them to the BWH EAs.

Except for Welfare Facilities, where a slight decline in compliance is observed, other areas such as Chemicals and Hazardous Substances, Emergency Preparedness, OSH Management Systems and Working Environment show significant improvements. As a result of advisory services and trainings provided to managers and workers by the Better Work Haiti team, chemicals are properly labelled and stored, material safety data sheets are found in the areas where chemicals are stored, and PPE is provided and workers are trained to use it. In terms of Emergency Preparedness, improvements were observed in terms of the accessibility of escape routes and emergency doors, emergency drills being conducted periodically, and a reliable fire detection and alarm system. Most of the factories (22 out of 24) have developed OSH policies and established OSH Committees. Further assistance will be provided by Better Work Haiti EAs to support the conduct of OSH self-assessment in the factories. Under Working Environment, EAs have observed remediation efforts to increase the light levels, and to decrease heat and noise levels. Some factories have also purchased equipment to measure light, noise and temperature levels themselves.

Under Working Time, compliance in Overtime has improved by 36%, mainly thanks to factory managers requesting and obtaining the authorization of MAST to perform overtime or to work on Sunday. Also, excessive overtime as reported in the previous report was found in fewer cases in the most recent cycle of assessments.

Section III: Better Work Haiti Advisory Services and Training

3.1 Better Work Haiti Advisory Services

This section highlights the advisory and training services undertaken by Better Work Haiti during the period of August 2012 to February 2013.

Performance Improvement Consultative Committees

Better Work programmes include both compliance assessments and advisory services. Following the assessment of compliance needs at a factory, Better Work Enterprise Advisors work directly with the factory to set up bipartite worker-management committee known as a Performance Improvement Consultative Committee (PICC). The EA supports the the PICCs to create and implement improvement plans that address both non-compliance issues and management systems. While factories are responsible for identifying and implementing improvement plans, advisory services ensure a tailored approach that provides direction and capacity building.

To date, three PICCs have been formed in Haiti: two PICCs (Island Apparel and Pacific Sports) were formed in 2011, and one was established at the end of 2012 at Interamerican Wovens. Better Work EAs are closely assisting the PICCs in Island Apparel and Pacific Sports to discuss non-compliances found during the assessments and to address issues that are above the scope of the non-compliance report. At Interamerican Wovens, the elections of the workers' representatives took place in December 2012. About 80% of the workers participated in the elections, which resulted in the selection of three women and three men as representatives. Management is represented by the same number of participants.

PICC guidelines provide guidance for the establishment of PICCs and define the role of the committee. It is Better Work's practice to involve sectoral trade unions and employer organizations in the development of the PICC guidelines in each country and to involve representative unions in the factory in the workers' side of the PICC. Trade unions in Lesotho, Vietnam, Nicaragua, Jordan, and Cambodia are involved in the establishment and operation of PICCs in their respective countries. In Haiti, unions have expressed some concerns with regard to the establishment of PICCs in the apparel factories as they suspect it could weaken their role. Better Work Haiti will consult further with unions of the garment sector, as well as employers, to bring clarification on the role of the PICCs and identify ways to accommodate their concerns. Better Work Haiti will also seek the assistance of the international trade union representatives present in Haiti in this process.

Advisory Services in the Reporting Period

Contracts and HR. During the most recent cycle, HR advisory services have been focused on the remediation of non-compliance issues related to employees' files not being properly maintained, internal work rules and worker termination processes. Human resources being a transversal function, these advisory services have also helped to address non-compliances in other clusters such as Discrimination (removal of inappropriate information requested in job applications), Occupational Safety and Health (sending accident reports to OFATMA on a regular basis), and Working Time (management of daily break period and overtime work). During these advisory meetings, emphasis has been placed on the importance of systematic monitoring of files sent to MAST and the need to reinforce the relationship with the Labour Department. These activities with HR managers have considerably improved compliance by aligning internal work rules and employments contracts with the labour code.

Working Time. Although Better Work Haiti observed improvements related to work time management, there is still a significant number of non-compliance findings, particularly in terms of Overtime. Better Work Haiti observed that, in general, the daily work schedule includes both regular hours and overtime. As a consequence, workers do not feel that overtime is voluntary. Thus, EAs advised factory managers to post the work schedule with a clear differentiation between regular hours and overtime and to communicate that overtime is voluntary. This focus of advisory services has supported the compliance effort that we observe in Chart 2, in which Leave, Overtime and Regular hours all show positive compliance effort: 14%, 36% and 18%, respectively.

3.2 Better Work Haiti Training Services

In addition to factory assessments and advisory work, the Better Work programme has designed a range of trainings intended for workers, line supervisors and HR managers. Better Work Haiti currently offers two trainings. Occupational Safety and Health includes one course for workers to raise awareness of the potential risks in the workplace and one course for OSH Committee members on how to conduct regular hazard assessments and identify solutions to decrease risk. The Life Skills training aims to raise awareness and increase knowledge among workers on social aspects of their life and hopefully reduce their vulnerability. In addition to supporting workers to make good decisions in their everyday life, this training provides them with more confidence and encourages them to disseminate helpful information to their peers. The Life Skills Training Kit includes the following modules: Maternity Protection, Introduction to Workplace Communication, Financial Literacy and Introduction to HIV/AIDS. The trainings are designed to accommodate approximately 25 participants and are delivered in meeting rooms; worker trainings, which take into account workers' literacy levels, are focused on participation and interaction through games and quizzes that encourage the learning and retention of information.

The training sessions have been very well received by both managers and workers. Between September 2012 and February 2013, 548 workers—including 339 women—were trained in six different factories on Workplace Communication, Maternity Protection and Occupational Safety and Health.

As the trainings are much appreciated and address factories' needs, Better Work Haiti has appointed a Training Officer whose main task will be to deliver worker and line supervisor trainings at the factory level.

3.3 Related activities

ILO Assistance. In October 2012, ILO Labour Standards and Social Dialogue experts provided a two-day training on the basics of social dialogue, as well as the related ILO core labour standards. The training was provided to all constituents, including the Labour Ombudsperson, CTMO-HOPE, ADIH, factory owners and managers, unions and representatives of MAST and the Ministry of Commerce and Industry. The training provided the members of the Social Dialogue Roundtable with the opportunity to start drafting the Memorandum of Understanding that will guide their future meetings.

Another training to support the Social Dialogue Roundtable members and the national stakeholders was provided in January 2013 by a Social Dialogue Expert of the ILO-International Training Centre. The workshop aimed at strengthening the negotiation skills of employers' and workers'

representatives in the Haitian garment sector who are involved in the Better Work Haiti programme. The workshop focused on how to negotiate in a manner that enables parties to reach mutually acceptable outcomes.

Section IV: Conclusions and Next Steps

4.1 Conclusion

This sixth public synthesis report helps to add significance to the data provided in previous reports. Both the findings, as well as the impacts of the programme, are further solidified by the data in this report.

The data presented in this report indicate that the provision of Better Work Haiti core services at the enterprise level creates an on-going process of measurable improvement in compliance with national labour law and ILO core labour standards in most factories.

Better Work Haiti will strengthen the quality and consistency of core services in 2013 by offering advisory services on a continuous basis and a regular menu of training programmes for both managers and workers in areas of common need identified through factory assessments. BWH will also strengthen the relationship between buyers and suppliers to develop joint approaches to improving conditions for workers and factory productivity and competitiveness.

Furthermore, Better Work Haiti will endeavour to extend its impact beyond the factory level by working with national stakeholders to develop a stable and long-term model for the apparel sector through the promotion of social dialogue and sound industrial relations at the factory and sectoral levels.

4.2 Next Steps

Better Work Haiti Advisory Services. Better Work will support the three existing PICC members in the preparation and facilitation of meetings. BWH will also support the setup of bipartite worker-management committees in factories where unions are present. As mentioned above, the increasing number of factories with union presence requires assistance and guidance on the ILO core labour standards, and particularly Conventions 87 and 98. Better Work Haiti will also support managers and workers' organizations in improving communication and effective resolution of problems at the factory level, through a better understanding of priority questions and needs in terms of the relationship with unions and workers.

Compliance Areas. During a PAC/CTMO-HOPE meeting in February 2013, a decision was made to prioritize the following recurrent non-compliance points in 2013: contributions to the social protection system (ONA and OFATMA); medical exams (whether at the time of hiring, annual and biannual to those workers exposed to risks); and onsite nurse services and medical services. Although these non-compliance points are observed at the factory level, these issues are also systemic or industry-wide. To this end, the programme is actively engaging with the national

stakeholders, and in particular with the CTMO-HOPE, to ensure effective approaches both in individual enterprises as well as in larger debates and discussions.

In the first half of the year, Better Work Haiti will focus on ensuring that factories have taken all necessary action to reduce fire safety hazards. To raise awareness in terms of fire safety and to reduce risk, Better Work Haiti, in close collaboration with the CTMO-HOPE and the industry association ADIH, will partner with the Port-au-Prince Fire Department to lead an industry-wide fire safety evaluation. Each factory will receive a thorough fire safety assessment, a report identifying recommendations to improve safety, a training on the use of fire extinguishers, a training on first-aid and an emergency drill.

Better Work Haiti Training Services

Occupational Health and Safety. Better Work Haiti EAs will continue to provide OSH awareness training to factories and will assist them in conducting OSH self-assessments. Both trainings aim at increasing workers' awareness of the different risks they are exposed to at work and encouraging them to be actors of change in the reduction of these risks. In particular, factory-level OSH Committees will be strengthened in order to maintain remediation efforts and ensure a safer environment for workers. In addition, Better Work Haiti EAs will continue to provide the life skills training modules to workers.

Supervisory Skills. The next training course that is being adapted for the local context is the four-day Supervisory Skills training. Supervisory Skills training is designed to give supervisors and middle managers a deeper understanding of important leadership and supervision concepts. Participants are trained to avoid a passive or authoritarian style of leadership and to strike a fair balance between the interests of the company and the interests of staff.

Training by the IDB. In April and May 2013, the Inter-American Development Bank (IDB), in partnership with Better Work Haiti, will provide trainings on safety and health at work as well as on environmental issues. The trainings includes health, safety and environmental issues, an advanced training for managers and workers who participated in the training provided in 2012, and a basic training for a new group of workers. These trainings are intended for managers and factory OSH Committee members. The objective of these trainings is to enhance knowledge of health, safety and environmental issues in the apparel industry to create safer workplaces and to improve compliance.

ILO World Day for Safety and Health at Work

On the occasion of the World Day for Health and Safety at Work (28 April) Better Work Haiti, in partnership with CTMO-HOPE, ADIH, and IDB, is planning the third Safety and Health at Work Fair at the SONAPI Industrial Park in Port-au-Prince with a focus on fire safety. New partners are joining the event, such as the Port-au-Prince Fire Department and COOPI (an Italian NGO specialising in emergency preparedness) to provide trainings and create "emergency brigades". Those brigades comprise both managers and workers ready to take the lead in managing emergency situations such as earthquakes and hurricanes. They can be established at the factory level, as well as at the industrial park level.

As in previous years, various Haitian NGOs will provide medical services and Better Work Haiti will promote a better understanding of risks in the workplace and preventive measures that managers and workers can take at their factories. Educational videos and quizzes on OSH topics are scheduled.

Section V: Factories in Detail

5.1 List of factories

As of January 2013, 24 factories were registered with Better Work Haiti. One new factory joined the programme in the current reporting period. At the time of the sixth cycle of assessments, two new factories, S&H Global and Gladiator Textiles LLC were assessed for the first time. Hence, as projected in the HOPE II Legislation Better Work Haiti will report on them publicly after a second assessment is conducted.

Table 2: Number of workers in factories registered to Better Work Haiti

	June 2010	December 2010	June 2011	December 2011	June 2012	December 2012
N° of workers in factories registered to Better Work Haiti	22,598	27,264	27,000	24,298	24,497	25,924
Of these, N° of women workers	14,796	16,978	15,783	15,523	15,380	16,688

Table 3: List of factories in the Haitian garment sector

Name of factory	Status
Astro Embroidery & Screen Printing	Out of operations
Codevi	Registered in 2009
DKDR HAITI S.A.	Registered in 2009
Fairway Apparel S.A.	Registered in 2010
Fox River Caribe, INC	Registered in 2009
Genesis S.A.	Registered in 2009
Gladiator Textiles LLC	Registered in 2012
Global Manufacturers & Contractors S.A.	Registered in 2010
Horizon Manufacturing S.A.	Registered in 2010
Indigo Mountain Haiti S.A.	Registered in 2012
InterAmerican Knits S.A.	Merged with InterAmerican Wovens S.A.
InterAmerican Tailor S.A.	Merged with One World Apparel S.A.
InterAmerican Wovens S.A.	Registered in 2009
Island Apparel S.A.	Registered in 2009
Johan Company	Registered in 2009
Lucotex Manufacturing CO	Registered in 2010
Magic Sewing MFG. S.A.	Registered in 2009
Modas Gloria Apparel S.A	Registered in 2009
Multiwear S.A.	Registered in 2009
One World Apparel S.A.	Registered in 2009
Pacific Sports Haiti S.A.	Registered in 2009
Palm Apparel S.A.	Registered in 2009

Premium Apparel S.A./AGA GROUP	Registered in 2009
Sew Rite Manufacturing	Out of operations
Sewing International S.A.	Registered in 2009
S&H Global S.A.	Registered in 2012
The Willbes Haitian I S.A.	Out of operations
The Willbes Haitian II S.A.	Registered in 2010
The Willbes Haitian III S.A.	Registered in 2010
The Willbes Haitian V /AZTECA	Out of operations

5.2. Findings from the factories

This section reports on efforts made by the factories to address their non-compliance findings as outlined in the previous HOPE II biannual reports (October 2010, April 2011, October 2011, April 2012 and October 2012). Following Better Work Haiti cycle, after receiving the assessment report factories have to identify their improvement priorities detailing them in an Improvement Plan. Better Work Haiti works alongside the factory through advisory services documenting progress made against these priorities in the Progress Report. The factory tables presented in this section provide detailed information derived from each factory's Improvement Plan and Progress Report.

As required by the HOPE II legislation, the following information is given for each factory that has been assessed at least twice by Better Work Haiti:

- compliance needs by compliance cluster and by compliance point: black dots ● represent non-compliance identified in the baseline assessment and non-compliance that has not yet been addressed by the factory in its improvement plan. Half-black dots ◐ represent areas where factories have made several improvements but are still in non-compliance since each compliance point is comprised by several questions;
- details on the non-compliance identified by EAs: the information included in this column constitutes the issues where evidence of non-compliance was found;
- improvement priorities identified by the factory;
- efforts made by the factory to remedy the compliance needs as verified in the sixth assessment visit;
- with respect to non-compliance areas that have not been remediated, the amount of time that has elapsed since the first public report.

In this report, the efforts made by these factories have been verified during the sixth factory assessments by Better Work Haiti EAs.

Location Ouanaminthe
No. of workers 6220
Registration Date 24 September 2009

Advisory Services and Training

7 September 2012 Social dialogue meeting
3-4 October 201. Social Dialogue Training provided by ILO for Public Relations Officer
22-23 October 2012 Management intro Meeting with Public Relations Officer after the 5th factory report has been submitted to discuss assessment findings and work on the action plan
22 November 2012 Social dialogue meeting
13 December 2012 Social dialogue meeting
21 January 2013 Factory visits with action plan. Review the IP and action plan with the Compliance Manager. Factory tour to measure the remediation efforts accomplished.
24 January 2013 Social dialogue meeting
29-31 January 2013 Negotiation Skills Training provided by ITC/ILO for Public Relations Officer

Compliance cluster		Compliance point	Assessments						Details of non-compliance	Improvement Priorities	Remediation Efforts	# Months
			1*	2*	3*	4*	5*	6*				
1	Child Labour	Child Labourers	○	○	○	○	○	○				
		Documentation and Protection of Young Workers	○	○	○	○	○	○				
		Hazardous Work	○	○	○	○	○	○				
		Unconditional Worst Forms	○	○	○	○	○	○				
2	Discrimination	Gender	○	●	○	○	○	○				
		Other Grounds	○	○	○	○	○	○				
		Race and Origin	○	●	○	○	○	○				
		Religion and Political Opinion	○	○	○	○	○	○				
3	Forced Labour	Bonded Labour	○	○	○	○	○	○				
		Coercion	○	○	○	○	○	○				
		Forced Labour and Overtime	○	○	○	○	○	○				
		Prison Labour	○	○	○	○	○	○				
4	Freedom of Association and Collective Bargaining	Collective Bargaining	○	●	●	●	●	◐	Implementation of collective agreement.	Correctly apply the collective bargaining agreement.	During advisory services, the factory states that it works 40 regular hours and 6.25 hours on overtime.	24
		Interference and Discrimination	○	○	○	○	○	○				

5	Compensation	Strikes	☐	☐	☐	☐	☐	☐			
		Union Operations	☐	☐	☐	☐	☐	☐			
		Method of Payment	☐	☐	☐	☐	☐	☐			
		Minimum Wages	☒	☐	☐	☒	☒	☒	Payment of minimum wage for full time workers.	Pay the basic minimum wage to all workers at BKI.	30
									Piece rate level.	Set quotas for workers to earn at least 300 Gourdes per regular 8 hour workday.	
		Overtime Wages	☒	☐	☒	☒	☐	☐			
		Paid Leave	☒	☐	☒	☒	☒	☒	Payment for weekly rest days.	Pay weekly rest day to all workers entitled to it.	18
		Premium Pay	☐	☐	☐	☒	☐	☐			
		Social Security and Other Benefits	☐	☒	☐	☒	☒	☒	Forwarding of workers' contributions for social insurance funds to ONA.	Regularly forward workers' contribution to ONA.	12
									Employer contribution to ONA.	Regularly forward employers' contribution to ONA.	
6	Contracts and Human Resources								Employer contribution to OFATMA for work-related accident insurance	Pay work-related accident insurance to OFATMA.	
		Wage Information, Use and Deduction	☒	☒	☐	☐	☒	☒	Deductions from workers' wages.	Show all deductions in the payroll reports and pay slips for BKI.	6
									Payroll records.	Fix and complete the inconsistency in the payroll reports for BKI and MD.	
									Informing workers about wage payments and deductions.	Inform and reflect the wage payments and deductions in the payroll at BKI.	
		Contracting Procedures	☐	☐	☐	☐	☐	☐			
		Discipline and Disputes	☐	☐	☐	☐	☐	☐			
		Employment Contracts	☐	☒	☐	☐	☐	☐			
		Termination	☐	☐	☐	☐	☐	☐			
7	Occupational Safety and Health	Chemicals and Hazardous Substances	☒	☒	☐	☐	☒	☐	Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Provide MSDS for all chemicals and hazardous substances in FW1, BKI, AM1, AM2 and MD.	30
									Washing facilities or cleansing materials in the event of chemical exposure.	Provide eye wash station in the spot cleaning in AM2 and BKI, mechanic shop AM1 and AM2, Managers office in BKI and fix the non-functional eye wash station in the spot cleaning FW1.	
										The factory provided all Inventories in buildings FW1, MD and AM2 were taken.	

Emergency Preparedness	●	◐	○	●	◐	◐	Firefighting equipment. Marking or posting of emergency exits and/or escape routes in the workplace.	Add missing fire extinguishers in manager office BKI, in the mechanic shop AM1, in the warehouse AM2 and MD. Add missing inspection tags in the fire extinguishers in FW1, AM1, AM2 and MD. Clear access to obstructed fire extinguishers in AM2 and MD. Inspect the fire extinguisher in the chemical room in AM2 Post the evacuation plan in BKI. Update the evacuation plan in AM1.	The factory trained the 10% of workforce in the use of fire-fighting equipment as recommended by Better Work. All escape routes in BKI, AM1 & AM2 were cleared.	12
Health Services and First Aid	●	●	●	●	●	◐	First aid boxes/supplies in the workplace. First aid training for workers. Pre-assignment and/or annual medical checks for workers.	Unlock first-aid boxes in BKI or make keys available on the floor. Fill up missing product in the first aid box in FW1. Train the 10% of workforce recommended by Better Work in First aid training. Provide medical checks to workers.	The factory provided chairs with backrests to pregnant or nursing workers. The factory built a clinic as required by the Haitian Labour Code.	30
OSH Management Systems	○	●	●	●	●	●	Recording work-related accidents and diseases and/or submitting the record to OFATMA.	Forward accidents reports to OFATMA.		24
Welfare Facilities	●	◐	◐	◐	●	●	Washing facilities and/or soap. Providing drinking water. Toilets. Eating area.	Provide soap for workers in all factories. Provide workers with enough free safe drinking water. Provide the amount of toilets required by the Haitian Labour Code. Provide seats for all the workers during lunch time.		30
Worker Accommodation	○	○	○	○	○	○				
Working Environment	○	○	●	◐	●	◐	Workplace temperature.	Decrease the temperature levels in the workplace.	The compliance manager will ensure that the noise level will be monitored every day be the OSH committee of the factory	18

8		Worker Protection	●	◐	◐	◐	●	◐	Providing workers with personal protective clothing and equipment.	Provide chemicals masks to all workers in the stamping area in FW1. Provide appropriate mask to workers in the spot cleaning area and PPE in the mechanic shop in BKI. Provided PPE in the chemical room where they do the mixture of ink for the stamping.	Advisory visits show that factory provides appropriate masks to workers who mix paint in FW1. However, workers in the printing department need to have the appropriate masks too.	30
									Training of workers to use machines and equipment safely.	Train workers to use machines and equipment safely.		
									Installing guards on all dangerous moving parts of machines and equipment.	Install and maintain proper guards on all dangerous moving parts of machines.	Guards have been installed in 80% of the machines in AM2 and on 75% of the machines in BKI. The factory provided chairs with backrest to all workers.	
	Working Time	Leave	○	○	○	○	●	●	Time off for breastfeeding breaks.	Provide the one hour breastfeeding break as mentioned in the breastfeeding policy to the workers entitled to it.		6
		Overtime	●	◐	●	●	●	◐	Limits on overtime hours worked.	Comply with limits on overtime hours worked in AM1 and correct inaccuracy between the payroll and the punch time record (FW1, AM2 and MD) in order to verify overtime hours.	The factory requested an authorization from the Department of Labour before working overtime.	30
		Regular Hours	●	◐	●	●	●	◐	Working time records.	Keep working time records that reflect the hours actually worked in FW1, AM2, and MD.	The factory reached an agreement with the workers on the daily break periods.	30

DKDR Haiti S.A.

Location Port-au-Prince
No. of workers 1621
Registration date 9 October 2009

Advisory Services and Training

20 & 21 September 2012 Workplace Communication 1 and 2 Training was provided to 36 workers and 21 supervisors.
20 September 2012 Management Intro Meeting with Management after the 5th factory report has been submitted to discuss assessment findings and work on the action plan. Factory visits with action plan. Review the previously sent IP and action plan with the Management.

Compliance cluster		Compliance point	Assessment						Details of non-compliance	Improvement priorities	Remediation Efforts	# Months
			1*	2*	3	4*	5*	6*				
1	Child Labour	Child Labourers	○	○	○	○	○	○				
		Documentation and Protection of Young Workers	○	○	○	○	○	○				
		Hazardous Work	○	○	○	○	○	○				
		Unconditional Worst Forms	○	○	○	○	○	○				
2	Discrimination	Gender	●	○	○	●	◐	◐	Sexual harassment	Set up a system and a policy on sexual harassment.	The factory management implemented a policy on sexual harassment that is posted in the workplace. Also several meetings were organized with all the supervisors and workers to inform them about the policy, the way to report sexual harassment incidents and the investigation process. However, sexual harassment remains a concern for workers in the factory.	12
		Other Grounds	○	○	○	○	○	○				
		Race and Origin	○	○	○	○	○	○				
		Religion and Political Opinion	○	○	○	○	○	○				
3	Forced Labour	Bonded Labour	○	○	○	○	○	○				
		Coercion	○	○	○	○	○	○				
		Forced Labour and Overtime	○	○	○	●	◐	●	Forced overtime beyond legal limits (threats of dismissal or other action that would reduce future income).	Ensure that overtime is voluntary.		12
		Prison Labour	○	○	○	○	○	○				
4	Freedom of Association and Collective Bargaining	Collective Bargaining	○	○	○	○	○	○				
		Interference and Discrimination	○	○	○	○	○	○				

5	Compensation	Strikes	☐	☐	☐	☐	☐	☐			
		Union Operations	☒	☐	☐	☐	☐	☐			
		Method of Payment	☐	☐	☐	☐	☐	☒	Timely payment of wages.	Provide workers' wages on time.	
		Minimum Wages	☒	☒	☒	☒	☒	☒	Piece rate level.	Quota should be set for piece rate workers to earn at least 300 gourdes in regular 8 hour day.	30
		Overtime Wages	☒	☐	☐	☐	☐	☐			
		Paid Leave	☒	☐	☐	☐	☒	☐		Payment of weekly rest days is ensured to all eligible workers.	
		Premium Pay	☐	☐	☐	☐	☐	☐			
		Social Security and Other Benefits	☒	☒	☒	☐	☒	☒	Forwarding of workers' contributions for social insurance funds to ONA.	Regularly forward workers' contribution to ONA.	6
									Employer contribution to ONA.	Regularly forward employers' contribution to ONA.	
									Employer contribution to OFATMA for work-related accident insurance	Forward 3% of workers salary to OFATMA.	
6	Contracts and Human Resources	Wage Information, Use and Deduction	☒	☐	☐	☐	☐	☒	Payroll records.	Ensure that the payroll records are accurate.	
		Contracting Procedures	☐	☐	☐	☐	☐	☐			
		Discipline and Disputes	☐	☐	☐	☐	☒		Disciplinary measures.	Comply with legal requirements related to disciplinary measures.	6
										Management ensured that workers are no longer subjected to bullying, harassment or humiliation.	
		Employment Contracts	☐	☒	☒	☐	☐	☐			
7	Occupational Safety and Health	Termination	☒	☐	☐	☒	☒	☐	Opportunity for workers to defend themselves before termination based on conduct or performance.	Provide to all workers the opportunity to defend themselves before termination.	12
										The factory included the reasons for termination in workers' files.	
		Chemicals and Hazardous Substances	☒	☐	☐	☐	☒	☒	Inventory of chemicals and hazardous substances used in the workplace.	Keep an inventory of all chemicals and hazardous substances used in the workplace.	30
									Labelling of chemicals and hazardous substances.	Label all chemicals and hazardous substances used in the workplace.	
									Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Display chemical safety data sheets for all chemicals and hazardous substances in the workplace.	
									Washing facilities or cleansing materials in the event of chemical exposure.	Provide washing facilities or cleansing materials in the event of chemical exposure.	

Emergency Prepared- ness	●	◐	◐	●	○	◐	Fire detection and alarm system.	Install fire detection system and ensure that the alarm system is functioning.	The factory trained the 10% of workforce recommended by Better Work in using the fire fighting equipment.	
Health Services and First Aid	●	◐	◐	●	●	◐	Onsite medical facilities and staff.	Increase the number of nurses and doctors visits on site.		30
							First aid boxes/supplies in the workplace.	Make first aid boxes accessible.		
							First aid training for workers.	10% of workforce should be trained in first aid.		
							Pre-assignment and/or annual medical checks for workers.	Provide medical checks within the first 3 months of hiring.	The factory has been providing health checks to workers who are exposed to work related hazards.	
OSH Management Systems	●	◐	◐	◐	○	○				
Welfare Facilities	●	●	●	◐	●	●	Washing facilities and/or soap.	Provide soap and toilet paper.		30
							Providing drinking water.	Provide workers with enough free safe drinking water.		
							Workplace cleanliness.	Workplace needs to be clean and tidy.		
							Toilets.	Provide the amount of toilets required by the Haitian Labour Code.		
							Eating area.	Provide an adequate eating area that can accommodate 90% of the workforce.		
Worker Accommoda- tion	○	○	○	○	○	○				
Working Environment	●	○	●	◐	●	◐	Workplace temperature	Decrease temperature in the workplace.		18
							Workplace lighting	Provide adequate lighting.		
							Workplace noise levels.	Decrease noise levels in the workplace.		
									The workplace is adequately ventilated	

8	Worker Protection		●	◐	◐	◐	◐	●	Providing workers with personal protective clothing and equipment.	Provide workers with personal protective clothing and equipment.	30
									Training and encouragement of workers to use the personal protective equipment provided.	Train and encourage workers to use the personal protective equipment provided.	
									Accommodating standing workers.	Accommodate standing workers.	
									Chairs with backrests.	Provide all workers chairs with backrests.	
									Training of workers to use machines and equipment safely.	Train workers to use machines and equipment safely.	
									Installing guards on all dangerous moving parts of machines and equipment.	Install guards on all dangerous moving parts of machines and equipment.	
	Working Time	Leave	●	○	●	●	●	○			The employer provides time off for breastfeeding breaks.
		Overtime	●	●	◐	●	●	◐	Voluntary overtime.	Inform all workers that overtime is voluntary.	30
									Limits on overtime hours worked.	Avoid exceeding the 80 hours of overtime per trimester.	
											The factory requested authorization from the Department of Labour for work on Sundays.
		Regular Hours	●	●	●	○	●	○			The employer keeps working time records that reflect the hours actually worked.

Fairway Apparel S.A.

Location Port-au-Prince
No. of workers 459
Registration date 22 October 2010

Advisory Services and Training

7 September 2012	Social dialogue meeting
26 September 2012 & 31 January 2013	Management Intro Meeting with Management after the 5 th factory report has been submitted to discuss assessment findings and work on the action plan.
26-27 September 2012	Workplace Communication 1 and 2 Training was provided to 56 workers and 9 supervisors.
09 November 2012	OSH Awareness Training for 23 workers
22 November 2012	Social dialogue meeting
13 December 2012	Social dialogue meeting
24 January 2013	Social dialogue meeting

	Compliance cluster	Compliance point	Assessment					Details of non-compliance	Improvement priorities	Remediation Efforts	# Months
			1*	2*	3*	4*	5*				
1	Child Labour	Child Labourers	○	○	○	○	○				
		Documentation and Protection of Young Workers	○	○	○	○	○				
		Hazardous Work	○	○	○	○	○				
		Unconditional Worst Forms	○	○	○	○	○				
2	Discrimination	Gender	●	○	○	○	○				
		Other Grounds	○	○	○	○	○				
		Race and Origin	○	○	○	○	○				
		Religion and Political Opinion	○	○	○	○	○				
3	Forced Labour	Bonded Labour	○	○	○	○	○				
		Coercion	○	○	○	○	○				
		Forced Labour and Overtime	○	○	●	○	○				
		Prison Labour	○	○	○	○	○				
4	Freedom of Association and Collective Bargaining	Collective Bargaining	○	○	○	○	○				
		Interference and Discrimination	○	○	○	○	○				
		Strikes	○	○	○	○	○				
		Union Operations	○	○	○	○	○				
5	Compensation	Method of Payment	○	○	○	○	○				

	Minimum Wages	●	●	●	●	●	Piece rate level.	Increase the piece rate level such as workers could earn 300 Gourdes after 8 hours of work.	24
	Overtime Wages	○	○	○	○	○			
	Paid Leave	●	○	●	○	○			
	Premium Pay	○	○	○	○	○			
	Social Security and Other Benefits	●	○	●	◐	●	Forwarding of workers' contributions for social insurance funds to ONA.	Regularly forward workers' contribution to ONA.	12
6							Employer contribution to ONA.	Regularly forward employers' contribution to ONA.	
							Employer contribution to OFATMA for work-related accident insurance.	Forward 3% of workers salary to OFATMA.	
	Wage Information, Use and Deduction	●	○	○	○	○			
	Contracting Procedures	○	○	○	○	○			
	Discipline and Disputes	○	○	●	○	○			
7	Employment Contracts	●	○	●	●	○		The factory consulted workers on the daily break period.	
								The factory approved internal work rules by the Ministry of Labour as required by the Law.	
	Termination	●	○	●	●	●	Reductions in workforce size due to changes in operations.	Send a notice to Ministry of Labour before reducing the workforce size due to changes in operation.	12
	Chemicals and Hazardous Substances	●	●	○	○	●	Labelling of chemicals and hazardous substances.	Label all chemicals and hazardous substances in the workplace.	
	Emergency Preparedness	○	●	●	●	◐	Training workers to use the fire fighting equipment	Train the 10% of workforce recommended by Better Work in using the fire fighting equipment.	18
	Health Services and First Aid	●	●	◐	●	◐	Onsite medical facilities and staff.	Increase the amount of nurse according to the Haitian law.	24
							First aid training for workers.	Train at least 10% of the workforce in first aid.	
							Pre-assignment and/or annual medical checks for workers.	Provide medical checks for all workers.	

Working Time

OSH Management Systems	●	●	●	●	◐	Assessment of general occupational safety and health issues in the factory.	Conduct a monthly assessment of general occupational safety and health issues in the factory.	The factory has elaborated an OSH policy.	24
Welfare Facilities	●	●	●	●	◐	Toilets.	Provide the amount of toilets required by the Haitian Labour Code.	The factory forwards accidents reports to OFATMA on a monthly basis.	24
Worker Accommodation	○	○	○	○	○				
Working Environment	○	●	○	●	●	Workplace lighting.	Increase the lighting levels in the workplace.		6
Worker Protection	●	●	●	●	◐	Accommodating standing workers.	Provide standing workers with anti-fatigue mats or foot rests.		24
						Installing guards on all dangerous moving parts of machines and equipment.	Install all the required guards on the machines: eye guard, finger guard, pulley and belt guards.	The factory trained the workers on the use of personal protective equipment.	
								The factory has posted safety warnings in the workplace, for instance label the electrical panel.	
Leave	○	○	●	●	●	Time off for breastfeeding breaks.	Establish a breastfeeding policy.		12
Overtime	●	●	◐	●	○			The factory complied with the limit of overtime hours worked as required by the law.	
								The factory obtained an authorization from MAST to work on Sundays.	
Regular Hours	●	●	●	●	●	Daily break periods.	Consult workers on the daily break periods.		24

Fox River Caribe Inc.

LocationPort-au-Prince
No. of workers54
Registration date29 September 2009

Advisory Services and Training

3 October 2012 & 31 January 2013Management intro meeting with management after the 5th factory report has been submitted in order to discuss assessment findings and work on the action plan.
11 October 2012Factory visits to measure the remediation efforts accomplished.

	Compliance cluster	Compliance point	Assessment						Details of non-compliance	Improvement priorities	Remediation Efforts	# Months
			1*	2*	3*	4*	5*	6*				
1	Child Labour	Child Labourers	☐	☐	☐	☐	☐	☐				
		Documentation and Protection of Young Workers	☐	☐	☐	☐	☐	☐				
		Hazardous Work	☐	☐	☐	☐	☐	☐				
		Unconditional Worst Forms	☐	☐	☐	☐	☐	☐				
2	Discrimination	Gender	☐	☐	☐	☐	☐	☐				
		Other Grounds	☐	☐	☐	☐	☐	☐				
		Race and Origin	☐	☐	☐	☐	☐	☐				
		Religion and Political Opinion	☐	☐	☐	☐	☐	☐				
3	Forced Labour	Bonded Labour	☐	☐	☐	☐	☐	☐				
		Coercion	☐	☐	☐	☐	☐	☐				
		Forced Labour and Overtime	☐	☐	☐	☐	☐	☐				
		Prison Labour	☐	☐	☐	☐	☐	☐				
4	Freedom of Association and Collective Bargaining	Collective Bargaining	☐	☐	☐	☐	☐	☐				
		Interference and Discrimination	☐	☐	☐	☐	☐	☐				
		Strikes	☐	☐	☐	☐	☐	☐				
		Union Operations	☐	☐	☐	☐	☐	☐				
5	Compensation	Method of Payment	☐	☐	☐	☐	☐	☐				
		Minimum Wages	☒	☐	☒	☐	☐	☒	Piece rate level.	Increase the piece rate level such as workers could earn 300 Gourdes after 8 hours of work		

6	Contracts and Human Resources	Overtime Wages									
		Paid Leave									
		Premium Pay									
		Social Security and Other Benefits							Forwarding of workers' contributions for social insurance funds to ONA.	Regularly forward workers' contribution to ONA.	
									Employer contribution to ONA.	Regularly forward employers' contribution to ONA.	
									Employer contribution to OFATMA for work-related accident insurance.	Forward 3% of workers salary to OFATMA.	
		Wage Information, Use and Deduction									
		Contracting Procedures									
		Discipline and Disputes									
		Employment Contracts									
7	Occupational Safety and Health	Termination									
		Chemicals and Hazardous Substances									
		Emergency Preparedness								The factory provided training to workers on the use of fire fighting equipment.	
		Health Services and First Aid							Onsite medical facilities and staff.	Ensure having one permanent nurse at the factory according to Haitian law.	30
									First aid training for workers.	Provide first aid training to workers.	
									Pre-assignment and/or annual medical checks for workers.	Provide medical checks to workers.	
		OSH Management Systems							Assessment of general occupational safety and health issues in the factory.	Conduct a monthly assessment of general occupational safety and health issues in the factory.	
									Mechanisms to ensure cooperation between workers and management on OSH matters.	Ensure cooperation on OSH matters between workers and management.	
										The factory set up an OSH policy and OSH committee	
		Welfare Facilities									
		Worker Accommodation									
		Working Environment									

8	Working Time	Worker Protection	☒	☐	☒	☒	☐	☒	Installing guards on all dangerous moving parts of machines and equipment.	Equip sewing machines with all guards needed.	30
		Leave	☐	☐	☐	☒	☐	☒	Time off for breastfeeding breaks.	Provide breastfeeding breaks to workers who are entitled to it.	
		Overtime	☐	☒	☐	☐	☐	☐			
		Regular Hours	☒	☒	☒	☐	☐	☐		The factory keeps working time records that reflect the hours actually worked.	

Genesis S.A.

Location Port-au-Prince
No. of workers 1162
Registration date 28 October 2009

Advisory Services and Training

05 October 2012 Management Intro Meeting with managers after the 5th factory report has been submitted in order to discuss assessment findings and work on the action plan
29-31 January 2013. Negotiation Skills Training provided by ITC/ILO for Management Team.
February 27, 2013 Meeting with management qnd compliance manager to discuss about the action plan and to observe the improvements done. Making a factory tour to verify improvements done by the factory on the OSH

Assessment										
Compliance cluster	Compliance point	1*	2*	3*	4*	5*	Details of non-compliance	Improvement priorities	Remediation Efforts	# Months
1	Child Labour	Child Labourers	☐	☐	☐	☐	☐			
		Documentation and Protection of Young Workers	☐	☐	☐	☐	☐			
		Hazardous Work	☐	☐	☐	☐	☐			
		Unconditional Worst Forms	☐	☐	☐	☐	☐			
	Discrimination	Gender	☐	☐	☐	☐	☐			
		Other Grounds	☐	☐	☐	☐	☐			
		Race and Origin	☐	☐	☐	☐	☐			
		Religion and Political Opinion	☐	☐	☐	☐	☐			
	Forced Labour	Bonded Labour	☐	☐	☐	☐	☐			
		Coercion	☐	☐	☐	☐	☐			
		Forced Labour and Overtime	☐	☐	☐	☐	☐			
		Prison Labour	☐	☐	☐	☐	☐			
	Freedom of Association and Collective Bargaining	Collective Bargaining	☐	☐	☐	☐	☐			
		Interference and Discrimination	☐	☐	☐	☐	☐			
		Strikes	☐	☐	☐	☐	☐			
		Union Operations	☐	☐	☐	☐	☐			

5	Compensation	Method of Payment	☐	☐	☐	☐	☐			
		Minimum Wages	☒	☒	☒	☒	☒	Piece rate level.	The factory needs to set the piece rate such as workers can earn 300 Gourdes within 8 hours.	24
		Overtime Wages	☐	☐	☐	☐	☐			
		Paid Leave	☒	☐	☐	☐	☐			
		Premium Pay	☐	☐	☐	☐	☐			
	Social Security and Other Benefits	☒	☒	☒	☐	☐	Employer contribution to ONA.	Pay employer’s contributions to ONA for social insurance funds based on the total basic earnings.	The employer increased its payment from 3% to 6% of the basic minimum wage.	24
							Employer contribution to OFATMA for work-related accident insurance.	Pay employer contribution to OFATMA for work-related accident insurance.		
							Collecting workers' contributions to ONA for social insurance funds.	Collect workers’ contributions to ONA for social insurance funds based on the total basic earnings.	The employer collects from the workers 6% of basic minimum wage instead of 3%.	
	Wage Information, Use and Deduction	☐	☐	☐	☐	☐				
6	Contracts and Human Resources	Contracting Procedures	☐	☐	☐	☐	☐			
		Discipline and Disputes	☐	☐	☐	☐	☐			
		Employment Contracts	☒	☒	☐	☐	☐			
		Termination	☐	☐	☐	☐	☐			
7	Occupational Safety and Health	Chemicals and Hazardous Substances	☒	☐	☐	☒	☐	Labelling of chemicals and hazardous substances.	The factory labelled all chemical and hazardous substances are now correctly labelled.	6
								Chemical safety data sheets for all chemical and hazardous substances in the workplace.	MSDS is now available for the Muriatic Acid and is posted in the workplace	
								Training workers who work with chemicals and hazardous substances.	The factory is conducted continuously training on the use of the PPE. Workers who have been trained on the use of the PPE also sign an agreement stating that they were educated on the use of the PPE.	

Emergency Preparedness	●	◐	◑	◑	●	◐	Fire fighting equipment. Training workers to use the fire fighting equipment Marking or posting of emergency exits and/or escape routes in the workplace. Accessible, unobstructed, and/or unlocked emergency exits during working hours, including overtime.	Provide adequate fire-fighting equipment in the workplace. Train at least 10% of the work force in fire fighting.	The factory cleared all exit doors. The factory marked and posted the Escape routes in the workplace.	24
Health Services and First Aid	●	◐	◐	●	◐	◐	Onsite medical facilities and staff. First aid boxes/supplies in the workplace. First aid training for workers. Pre-assignment and/or annual medical checks for workers.	Hire more nurses and ensure doctors' visits on site. Train 10% of workforce in first aid. Provide medical checks to all workers.	The factory has trained 93 workers. The factory provided access and designated 2 persons to manage the first aid boxes. The factory has provided medical checks to 147 workers. And sent all the new hired workers to Bernard Mevs for the medical check within the first three months of hiring	24
OSH Management Systems	●	●	●	◐	○				The factory elaborated an OSH policy. The factory established an OSH committee and has conducted several OSH self-assessments	
Welfare Facilities	●	◐	●	◐	●		Toilets. Eating area.	Provide the amount of toilets required by the Haitian Labour Code. Provide an adequate eating area that can accommodate 90% of the workforce.		24
Worker Accommodation	○	○	○	○	○					
Working Environment	●	◐	◐	●	○	○				

8	Working Time	Worker Protection		Training and encouragement of workers to use the personal protective equipment provided.	Reinforce the training for workers to effectively use machines and equipment safely.	24
				Training of workers to use machines and equipment safely.	Train workers to use machines and equipment safely.	
				Installing guards on all dangerous moving parts of machines and equipment.	Install all the required guards on the machines: eye guard, finger guard, pulley and belt guards.	
				Installing, grounding, and/or maintaining electrical wires, switches, and/or plugs.	The factory maintained the electrical boxes in the compressor room.	
		Leave				
		Overtime		Limits on overtime hours worked.	Do not exceed the legal overtime limit	24
					The factory let workers leave the workplace during overtime hours.	
		Regular Hours				

Global Manufacturers & Contractors S.A

Location Port-au-Prince
No. of workers 1978
Registration date 19 September 2010

Advisory Services and Training

7 September 2012 Social Dialogue meeting
12 October 2012 Management Intro Meeting with Management after the 5th factory report has been submitted to discuss assessment findings and work on the action plan.
03-04 October 2012 Social Dialogue Training provided by ILO for Factory Owner
22 November 2012 Social Dialogue meeting
13 December 2012 Social Dialogue meeting
24 January 2013 Social Dialogue meeting
29-31 January 2013 Negotiation Skills Training provided by ITC/ILO
31 January 2013 Advisory visit on FOA.
1st February 2013 Advisory visit on FOA.
19 February 2013 Advisory visit on FOA.

	Compliance cluster	Compliance point	Assessment					Details of non-compliance	Improvement priorities	Remediation Efforts	# Months
			1*	2*	3*	4*	5*				
1	Child Labour	Child Labourers	☐	☐	☐	☐	☐				
		Documentation and Protection of Young Workers	☐	☐	☐	☐	☐				
		Hazardous Work	☐	☐	☐	☐	☐				
		Unconditional Worst Forms	☐	☐	☐	☐	☐				
2	Discrimination	Gender	☐	☐	☐	☐	☐				
		Other Grounds	☐	☐	☐	☐	☐				
		Race and Origin	☐	☐	☐	☐	☐				
		Religion and Political Opinion	☒	☐	☐	☐	☐				
3	Forced Labour	Bonded Labour	☐	☐	☐	☐	☐				
		Coercion	☐	☐	☐	☐	☐				
		Forced Labour and Overtime	☐	☐	☐	☐	☐				
		Prison Labour	☐	☐	☐	☐	☐				

4	Freedom of Association and Collective Bargaining	Collective Bar-gaining	☐	☐	☐	☐	☐			
		Interference and Discrimina-tion	☐	☐	☐	☐	☐			
		Strikes	☐	☐	☐	☐	☐			
		Union Opera-tions	☐	☐	☐	☐	☐			
5	Compensation	Method of Payment	☐	☐	☐	☐	☐			
		Minimum Wag-es	☒	☒	☒	☒	☒	Piece rate level.	Set quota for piece rate workers to earn at least 250 Gourdes in a regular 8 hour workday.	24
		Overtime Wag-es	☐	☐	☐	☐	☐			
		Paid Leave	☐	☐	☐	☐	☒	Payment for weekly rest days.	Pay correctly for weekly rest days.	
		Premium Pay	☐	☐	☐	☐	☐			
		Social Security and Other Benefits	☒	☒	☒	☐	☒	Forwarding of workers' contributions for social insurance funds to ONA.	Forward workers' contributions for social insurance funds to ONA.	24
								Employer contribution to ONA.	Pay employer's contribution to ONA.	
								Collecting workers' contributions to ONA for social insurance funds.	Collect workers' contributions to ONA for social insur- ance funds.	
6	Contracts and Human Re-sources	Wage Infor-mation, Use and Deduction	☒	☐	☐	☐	☐			
		Contracting Procedures	☐	☐	☐	☐	☐			
		Discipline and Disputes	☐	☐	☐	☐	☐			
		Employment Contracts	☒	☒	☐	☐	☐			
		Termination	☒	☐	☐	☐	☐			
7	Occupational Safety and Health	Chemicals and Hazardous Substances	☒	☒	☐	☒	☐	Washing facilities or cleansing materials in the event of chemical exposure.	Provide washing facilities or cleansing materials in the event of chemical exposure in chemical storage area. The factory posted MSDS in chemical storage area.	6

	Emergency Preparedness	●	●	◐	◐	◐	Fire detection and alarm system.	Fix the fire detection and alarm system.		24
							Training workers to use the fire fighting equipment	Train at least 10% of the work force in fire fighting.	The employer provided fire fighting training to 66 workers.	
							Marking or posting of emergency exits and/or escape routes in the workplace.	Mark escapes routes.		
							Periodic emergency drills.	Conduct an emergency drill every 6 months.		
	Health Services and First Aid	●	●	◐	◐	◐	Onsite medical facilities and staff.	Increase number of nurses and of weekly doctor visits.		24
							First aid boxes/supplies in the workplace.	Ensure that first aid boxes keys are available and easily accessible on the floor.	A sufficient number of first aid boxes are available on the floor.	
							First aid training for workers.	Train at least 10% of the work force in first aid.	The employer provided first-aid training to 66 workers.	
							Pre-assignment and/or annual medical checks for workers.	Provide medical checks annually for all workers and bi-annually for workers exposed to chemicals in stamping area.		
	OSH Management Systems	●	●	○	●	○			The factory started assessing general occupational safety and health issues on a monthly basis.	
									The factory records work-related accidents and diseases and submits the record to OFATMA.	
	Welfare Facilities	●	◐	●	●	●	Washing facilities and/or soap.	Provide soap to workers during all day.		24
							Toilets.	Provide the amount of toilets required by the Haitian Labour Code.		
	Worker Accommodation	○	○	○	○	○				
	Working Environment	●	◐	◐	◐	●	Workplace lighting.	Adequately lit the workplace.		24
	Worker Protection	●	◐	◐	◐	●	Providing workers with personal protective clothing and equipment.	Provide workers with personal protective clothing and equipment.		24
							Accommodating standing workers.	Provide anti-fatigue and/or footrest mat to standing workers.		
							Training of workers to use machines and equipment safely.	Reinforce training of workers on the safe use of the machines.		
							Installing guards on all dangerous moving parts of machines and equipment.	Install guards on machines as needed.		
8	Working Time	Leave	●	●	●	○	○			



Overtime		Limits on overtime hours worked.	Do not exceed the legal overtime limit.	The factory let the workers leave the workplace during over-time hours.	24
				The factory obtained authorization from the Department of Labour to work overtime.	
Regular Hours				The factory reached an agreement with workers on the daily break period.	

Horizon Manufacturing S.A.

Location Port-au-Prince
No. of workers 398
Registration date 25 August 2010

Advisory Services and Training	
03 October 2012 & 31 January 2013	Management intro meeting with management after the 5 th factory report has been submitted in order to discuss assessment findings and work on the action plan
03-04 October 2012	Social Dialogue Training provided by ILO for factory management
07 November 2012	Advisory service on the factory’s payroll
13 November 2012	Follow-up advisory visit on the factory’s payroll
19 February 2013	Follow-up visit on the progress of issues chosen as priority in the improvement plan

	Compliance cluster	Compliance point	Assessment					Details of non-compliance	Improvement Priorities	Remediation Efforts	# Months
			1*	2*	3*	4*	5*				
1	Child Labour	Child Labourers	☐	☐	☐	☐	☐				
		Documentation and Protection of Young Workers	☐	☐	☐	☐	☐				
		Hazardous Work	☐	☐	☐	☐	☐				
		Unconditional Worst Forms	☐	☐	☐	☐	☐				
2	Discrimination	Gender	☐	☐	☐	☐	☐				
		Other Grounds	☐	☐	☐	☐	☐				
		Race and Origin	☐	☐	☐	☐	☐				
		Religion and Political Opinion	☐	☐	☐	☐	☐				
3	Forced Labour	Bonded Labour	☐	☐	☐	☐	☐				
		Coercion	☐	☐	☐	☐	☐				
		Forced Labour and Overtime	☐	☐	☐	☐	☐				
		Prison Labour	☐	☐	☐	☐	☐				
4	Freedom of Association and Collective Bargaining	Collective Bargaining	☐	☐	☐	☐	☐				
		Interference and Discrimination	☐	☐	☐	☐	☐				
		Strikes	☐	☐	☐	☐	☐				
		Union Operations	☐	☐	☐	☐	☐				
5	Compensation	Method of Payment	☐	☐	☐	☐	☐				

6	Contracts and Human Resources	Minimum Wages	●	●	●	●	●	Piece rate level.	Set quota for piece rate workers to earn at least 300 Gourdes in a regular 8 hour work-day.	24
		Overtime Wages	○	○	○	○	○			
		Paid Leave	●	○	○	○	○			
		Premium Pay	○	○	○	○	○			
		Social Security and Other Benefits	●	○	○	○	○			
		Wage Information, Use and Deduction	●	○	○	○	○			
		Contracting Procedures	○	○	○	○	○			
		Discipline and Disputes	○	○	○	○	○			
		Employment Contracts	●	●	◐	○	○			
		Termination	○	○	○	○	○			
7	Occupational Safety and Health	Chemicals and Hazardous Substances	○	●	●	◐	○		The factory keeps the inventory of chemicals and hazardous substances used in the workplace. The factory properly labels all containers containing chemicals and hazardous substances.	
		Emergency Preparedness	○	●	○	●	○		The factory keeps all emergency exits accessible, unobstructed, and unlocked during working hours, including overtime and daily breaks.	
		Health Services and First Aid	●	◐	●	◐	●	Onsite medical facilities and staff. Pre-assignment and/or annual medical checks for workers.	Increase number of nurses and of weekly doctor visits. Provide medical checks annually for all workers and bi-annually for workers exposed to chemicals in stamping area.	24
		OSH Management Systems	●	○	◐	○	○			
		Welfare Facilities	●	◐	◐	○	○		The factory provided soap in the toilets during all day.	
		Worker Accomod.	○	○	○	○	○			
		Working Environment	○	●	○	●	○		The factory lowered temperature in the workplace. The factory increased light level in the workplace.	
		Worker Protection	○	●	◐	◐	○		The factory reinforced training of workers on the safe use of the machines.	
		Leave	○	●	○	○	○			
		Overtime	●	○	●	◐	○		The factory respects limit of overtime hours as required by the law.	
8	Working Time	Regular Hours	●	◐	●	○	○		The Ministry of Labour approved the internal work rules.	

Indigo Mountain Haiti S.A.

Location Port-au-Prince
No. of workers 179
Registration date 15 March 2012

Advisory Services and Training

26 September 2012 & 14 January 2013 Management intro meeting with management after the 5th factory report has been submitted in order to discuss assessment findings and work on the action plan.
27 September 2012 Follow-up meeting on the improvement plan.
11 January 2013 Advisory services on improvement plan
1st March 2013 Follow-up visit on improvement plan

Compliance cluster		Compliance point	Assessments Details of non-compliance		Improvement Priorities	Remediation Efforts	# of Months
			1*	2*			
1	Child Labour	Child Labourers	☐	☐			
		Documentation and Protection of Young Workers	☐	☐			
		Hazardous Work	☐	☐			
		Unconditional Worst Forms	☐	☐			
2	Discrimination	Gender	☐	☐			
		Other Grounds	☐	☐			
		Race and Origin	☐	☐			
		Religion and Political Opinion	☐	☐			
3	Forced Labour	Bonded Labour	☐	☐			
		Coercion	☐	☐			
		Forced Labour and Overtime	☐	☐			
		Prison Labour	☐	☐			
4	Freedom of Association and Collective Bargaining	Collective Bargaining	☐	☐			
		Interference and Discrimination	☐	☐			
		Strikes	☐	☐			
		Union Operations	☐	☐			
5	Compensation	Method of Payment	☒	☐		The factory pays wages on time.	
		Minimum Wages	☒	☒	Piece rate level.	Set the piece rate at a level where workers earn at least 300 Gourdes per day for ordinary hours of work.	6
		Overtime Wages	☒	☒	Payment for ordinary overtime.	Pay workers 50% above the normal wage for all Ordinary overtime hours worked.	6

		Paid Leave	●	●	Payment for weekly rest days.	Pay workers correctly for weekly rest days.	6	
					Payment for sick leave.	Pay workers correctly during sick leave.		
		Premium Pay	○	○				
		Social Security and Other Benefits	●	●	Forwarding of workers' contributions for social insurance funds to ONA.	Forward workers' contributions for social insurance funds to ONA.	6	
					Employer contribution to ONA.	Forward employer contributions to ONA.	The factory pays employer contributions to OFATMA for work-related accident insurance.	
		Wage Information, Use and Deduction	●	●	Payroll records.	Keep accurate payroll records.	6	
6	Contracts and Human Resources	Contracting Procedures	○	○				
		Discipline and Disputes	○	○				
		Employment Contracts	○	○				
		Termination	○	●	Reasons for termination.	Add reasons for termination in workers files.		
					Opportunity for workers to defend themselves before termination based on conduct or performance.	Give workers an opportunity to defend themselves before termination.		
					Notice of termination.	Provide workers a proper notice of termination when required and pay workers during the notice period.		
					Annual salary supplement or bonus upon termination.	Pay workers their annual salary supplement or bonus upon termination.		
					Judicially ordered damages for wrongful termination.	Pay judicially ordered damages for wrongful termination.		
7	Occupational Safety and Health	Chemicals and Hazardous Substances	●	○			The factory labelled all chemical and hazardous substances.	
		Emergency Preparedness	●	●	Fire fighting equipment.		The factory inspected all fire extinguishers have been inspected are functional	6
					Training workers to use the fire fighting equipment.	Train 10% of workers in fire fighting.		
					Accessible, unobstructed, and/or unlocked emergency exits during working hours, including overtime.		The factory kept all emergency exits accessible, unobstructed, and unlocked during working hours, including overtime and daily break.	

8		Health Services and First Aid	●	●	Onsite medical facilities and staff.	Provide required onsite medical facilities and staff.	The factory has a policy addressing potential safety and health risks to pregnant or nursing workers.	6
					First aid training for workers.	Train at least 10% of the workforce on first aid.		
					Pre-assignment and/or annual medical checks for workers.	Provide annual medical checks for workers.		
		OSH Management Systems	●	●	Assessment of general occupational safety and health issues in the factory.	Conduct a monthly assessment of general occupational safety and health issues in the factory.		6
					Recording work-related accidents and diseases and/or submitting the record to OFATMA.	Forward work-related accident reports to OFATMA.		
		Welfare Facilities	●	●	Washing facilities and/or soap.	Provide soap and missing washing facilities.		6
					Providing drinking water.	Provide workers with enough free safe drinking water.		
					Toilets.	Provide the amount of toilets required by the Haitian Labour Code.		
					Eating area.	Provide an adequate eating area that can accommodate 90% of the workforce.		
		Worker Accommodation	○	○				
	Working Environment		●	●	Workplace temperature.	Decrease temperature in the workplace.		6
					Workplace noise levels.	Decrease the noise levels in the workplace.		
					Workplace lighting.	Provide adequate lighting in the workplace.		
	Worker Protection		●	●	Providing workers with personal protective clothing and equipment.	Provide workers with all necessary personal protective clothing and equipment.	The factory provided fatigue mats for standing workers and seats to standing workers to allow them to sit down at regular intervals.	6
					Installing guards on all dangerous moving parts of machines and equipment.	Install all the missing guards on the machines.		
	Working Time						The factory provided support belts to workers who have to do heavy lifting.	
			●	●	Time off for breastfeeding breaks.	Provide breastfeeding breaks to workers entitled to them.	The factory obtained authorization from the Department of Labour for overtime.	6
			●	●	Voluntary overtime.	Let all workers know that overtime is voluntary.		6
	Regular Hours		○	●	Working time records.	Keep working time records that reflect the hours actually worked.		
					Daily break periods.	Reach an agreement with workers on the daily break period.		

Interamerican Wovens S.A.

Location Port-au-Prince
No. of workers 822
Registration date 28 October 2009

Advisory Services and Training

03-04 October 2012 Social Dialogue Training provided by ILO for Management.
28 February 2013 Management intro meeting with management after the 5th factory report has been submitted in order to discuss assessment findings and work on the action plan
22 November 2012 Social Dialogue meeting
14 December 2012 PICC election where 649 over 792 workers were participated
29-31 January 2013 Negotiation Skills Training provided by ITC/ILO

Compliance cluster		Compliance point	Assessment					Details of non-compliance	Improvement Priorities	Remediation Efforts	# of months
			1*	2*	3*	4*	5*				
1	Child Labour	Child Labourers	☐	☐	☐	☐	☐				
		Documentation and Protection of Young Workers	☐	☐	☐	☐	☐				
		Hazardous Work	☐	☐	☐	☐	☐				
		Unconditional Worst Forms	☐	☐	☐	☐	☐				
2	Discrimination	Gender	☒	☒	☐	☐	☐				
		Other Grounds	☐	☐	☐	☐	☐				
		Race and Origin	☐	☐	☐	☐	☐				
		Religion and Political Opinion	☒	☒	☐	☐	☐				
3	Forced Labour	Bonded Labour	☐	☐	☐	☐	☐				
		Coercion	☐	☐	☐	☐	☐				
		Forced Labour and Overtime	☐	☐	☐	☐	☐				
		Prison Labour	☐	☐	☐	☐	☐				
4	Freedom of Association and Collective	Collective Bargaining	☐	☐	☐	☐	☐				

	Bargaining	Interference and Discrimination	☐	☐	☐	☐	☐			
		Strikes	☐	☐	☐	☐	☐			
		Union Operations	☒	☐	☐	☐	☐			
5	Compensation	Method of Payment	☐	☐	☐	☐	☐			
		Minimum Wages	☐	☒	☒	☒	☒	Piece rate level.	Set the piece rate at a level where workers earn at least 300 Gourdes per day for ordinary hours of work.	18
		Overtime Wages	☐	☐	☐	☐	☐			
		Paid Leave	☐	☐	☐	☒	☐		The factory is now paying the sick leave according to the law. The factory has displayed a list of approved medical centres and hospitals that can provide medical certificates to workers and employees. This list is posted at the work-place.	
		Premium Pay	☐	☐	☐	☐	☐			
		Social Security and Other Benefits	☒	☒	☒	☐	☒	Forwarding of workers' contributions for social insurance funds to ONA.	Regularly forward workers' contribution to ONA.	
								Employer contribution to ONA.	Regularly forward employer contribution to ONA.	
								Collecting workers' contributions to ONA for social insurance funds.	Collect workers' contributions to ONA for social insurance funds.	
6	Contracts and Human Resources	Wage Information, Use and Deduction	☐	☒	☐	☐	☐			
		Contracting Procedures	☐	☐	☐	☐	☐			
		Discipline and Disputes	☐	☐	☐	☐	☒	Disciplinary measures.	Ensure that disciplinary measures comply with legal requirement.	
								Bullying, harassment or humiliating treatment of workers.	Ensure that workers are not being bullied, harassed or subjected to humiliating treatment.	
		Employment Contracts	☐	☒	☒	☐	☐		The factory revised its internal work rules to comply with legal requirements.	
		Termination	☒	☐	☐	☐	☒	Reductions in workforce size due to changes in operations.	Notify the Ministry of Labour when reducing the size of the workforce	

7	Occupational Safety and Health	Chemicals and Hazardous Substances	●	●	◐	◐	◐	Labelling of chemicals and hazardous substances.	Label all chemical and hazardous substances in the workplace.		24
									The factory has now posted chemical safety data sheets in the workplace		
									Adequate washing facilities or cleansing materials are being provided to workers in the event of chemical exposure.		
		Emergency Preparedness	○	●	◐	○	●	Fire detection and alarm system.	Install a fire detection system in the workplace.		
								Training workers to use the fire-fighting equipment.	Train at least 10% of the workforce in the use of fire-fighting equipment as recommended by Better Work.		
		Health Services and First Aid	●	●	●	◐	●	Health checks for workers who are exposed to work-related hazards.	Provide health check to workers exposed to work-related hazards.		24
								Onsite medical facilities and staff.	Increase onsite medical staff.		
								First aid boxes/supplies in the workplace.	Ensure that all first aid boxes are readily accessible in the workplace.		
								First aid training for workers.	Train at least 10% of the workforce in first aid as recommended by Better Work		
								Pre-assignment and/or annual medical checks for workers.	.Ensure that medical checks are provided to workers on pre-assignment and annually.		
		OSH Management Systems	●	○	●	○	○				
		Welfare Facilities	●	●	◐	◐	◐	Toilets.	Repair and increase the number of toilets for both genders.		24
								Eating area.	Increase the number of seats in the existing eating area and ensure that workers are well accommodated.	The factory has a cleaning system in place to ensure that the workplace is clean and tidy.	
		Worker Accommodation	○	○	○	○	○				
		Working Environment	○	○	●	●	○			The factory lowered the workplace temperature.	
										The factory increased the lighting in the workplace.	

8	Working Time	Worker Protection	●	◐	●	○	●	Training of workers to use machines and equipment safely. Installing guards on all dangerous moving parts of machines and equipment. Installing, grounding, and/or maintaining electrical wires, switches, and/or plugs.	Provide training to workers on the use of machine and equipment. Install guards on all dangerous moving parts of machines and equipment. Ensure that electrical wires, switches and plugs are properly installed, grounded and maintained.	
		Leave	○	○	●	●	○		The factory has now established a breastfeeding policy which is implemented.	
		Overtime	●	○	●	●	◐	Voluntary overtime.	Ensure that overtime hours are voluntary and workers are able to leave the workplace during overtime hours.	12
									The limit of overtime worked is in compliance with the legal requirements.	
									The factory has obtained the authorization of MAST to work overtime and on Sundays.	
		Regular Hours	●	○	●	○	○			

Island Apparel S.A.

Location Port-au-Prince
No. of workers 1595
Registration date 9 September 2009

Advisory Services and Training	
21 August 2012	PICC Meeting
25 September 2012 & 8 Feb 2013	Management Intro Meeting with Compliance Manager and Finance and Administration Manager after the 5 th factory report has been submitted to discuss assessment findings and work on the action plan.
27 September 2012	PICC Meeting
03-04 October 2012	Social Dialogue Training provided by ILO for Compliance Manager and HR Manager
22 October 2012	PICC Meeting
27 November 2012	PICC Meeting
13 December 2012	Social Dialogue meeting
24 January 2013	Social Dialogue meeting
29-31 January 2013	Negotiation Skills Training provided by ITC/ILO for HR Manager
26 February 2013	Maternity protection training for 35 workers

		Assessment						Details of non-compliance	Improvement Priorities	Remediation Efforts	# months
Compliance cluster	Compliance point	1*	2*	3*	4*	5*	6*				
1	Child Labour	Child Labourers	○	○	○	○	○				
		Documentation and Protection of Young Workers	○	○	○	○	○				
		Hazardous Work	○	○	○	○	○				
		Unconditional Worst Forms	○	○	○	○	○				
2	Discrimination	Gender	○	○	○	○	○				
		Other Grounds	○	○	○	○	○				
		Race and Origin	○	○	○	○	○				
		Religion and Political Opinion	○	○	○	○	○				
3	Forced Labour	Bonded Labour	○	○	○	○	○				
		Coercion	●	○	○	○	○				
		Forced Labour and Overtime	○	○	○	○	○				
		Prison Labour	○	○	○	○	○				
4	Freedom of Association and Collective Bargaining	Collective Bargaining	○	○	○	○	○				
		Interference and Discrimination	○	○	○	○	○				

5	Compensation	Strikes	☐	☐	☐	☐	☐	☐			
		Union Operations	☐	☐	☐	☐	☐	☐			
		Method of Payment	☐	☐	☐	☐	☐	☐			
		Minimum Wages	☒	☐	☒	☒	☒	☒	Piece rate level.	Set piece rate at a level such that workers earn at least 300 Gourdes per day for ordinary hours of work.	18
		Overtime Wages	☒	☐	☐	☐	☐	☐			
		Paid Leave	☒	☐	☐	☐	☐	☐			
		Premium Pay	☐	☐	☐	☐	☐	☐			
		Social Security and Other Benefits	☐	☒	☐	☐	☐	☐			
6	Contracts and Human Resources	Wage Information, Use and Deduction	☐	☐	☐	☐	☐	☐			
		Contracting Procedures	☐	☐	☐	☐	☐	☐			
		Discipline and Disputes	☒	☐	☐	☐	☐	☐			
		Employment Contracts	☒	☐	☐	☐	☐	☐			
7	Occupational Safety and Health	Termination	☒	☐	☐	☐	☐	☐			
		Chemicals and Hazardous Substances	☒	☐	☐	☐	☒	☐	Labelling of chemicals and hazardous substances.	Label of chemicals and hazardous substances. The factory keeps a detailed inventory of chemicals and hazardous substances used in the workplace.	6
		Emergency Preparedness	☒	☐	☐	☐	☐	☒	Marking or posting of emergency exits and/or escape routes in the workplace.	Post all emergency exits and/or escape routes in the workplace.	
		Health Services and First Aid	☒	☐	☐	☐	☒	☐	Onsite medical facilities and staff.	Increase the number of nurses. The factory provides medical checks to all new workers within 3 months of hiring.	30
		OSH Management Systems	☒	☐	☐	☐	☐	☐			
		Welfare Facilities	☒	☐	☐	☐	☐	☒	Toilets.	Increase the number of toilets according to the Haitian Labour Code requirements.	
		Worker Accommodation	☐	☐	☐	☐	☐	☐			
		Working Environment	☒	☐	☒	☐	☒	☐	Workplace temperature.	Decrease temperature levels in the workplace. The factory installed 15 new fans. However, management is looking into other more effective ways to reduce the temperature.	18
8	Working Time	Worker Protection	☒	☐	☒	☐	☒	☒	Accommodating standing workers.	Provide standing workers with fatigue mats and/or foot rest.	18
									Installing guards on all dangerous moving parts of machines and equipment.	Install guards on all dangerous moving parts of machines and equipment.	
		Leave	☐	☐	☒	☐	☐	☐			



Overtime		The factory implemented a new policy for a better monitoring of overtime hours. Line supervisors have to approve overtime with a stamp on the daily punch card.
Regular Hours		

Johan Company

Location Port-au-Prince
No. of workers 149
Registration date 23 September 2009

Advisory Services and Training

12 October 2012 Management Intro Meeting with Factory Owner after the factory report has been submitted to discuss assessment findings and work on the action plan.
16 November 2012 Follow-up visit on the improvements with Management Assistant.

	Compliance cluster	Compliance point	Assessment						Details of non-compliance	Improvement Priorities	Remediation Efforts	# Months
			1*	2*	3*	4*	5*	6*				
1	Child Labour	Child Labourers	☐	☐	☐	☐	☐	☒	Age verification system.	Implement an appropriate age verification system at hiring.		
		Documentation and Protection of Young Workers	☐	☒	☐	☐	☐	☐				
		Hazardous Work	☐	☐	☐	☐	☐	☐				
		Unconditional Worst Forms	☐	☐	☐	☐	☐	☐				
2	Discrimination	Gender	☐	☐	☐	☒	☐	☐				
		Other Grounds	☐	☐	☐	☐	☐	☐				
		Race and Origin	☐	☐	☐	☐	☐	☐				
		Religion and Political Opinion	☐	☐	☐	☐	☐	☐				
3	Forced Labour	Bonded Labour	☐	☐	☐	☐	☐	☐				
		Coercion	☐	☐	☐	☐	☐	☐				
		Forced Labour and Overtime	☐	☐	☐	☐	☐	☐				
		Prison Labour	☐	☐	☐	☐	☐	☐				
4	Freedom of Association and Collective Bargaining	Collective Bargaining	☐	☐	☐	☐	☐	☐				
		Interference and Discrimination	☐	☐	☐	☐	☐	☐				
		Strikes	☐	☐	☐	☐	☐	☐				
		Union Operations	☐	☐	☐	☐	☐	☐				
5	Compensation	Method of Payment	☐	☐	☐	☐	☐	☐				
		Minimum Wages	☒	☐	☒	☒	☒	☒				
									Piece rate level.	Set piece rate at a level such that workers earn at least 300 Gourdes per day for ordinary hours of work.		18

Contracts and Human Resources

Overtime Wages	●	○	○	○	○	○			
Paid Leave	●	○	○	●	○	○			
Premium Pay	○	○	○	○	○	○			
Social Security and Other Benefits	●	●	●	●	◐	●	Forwarding of workers' contributions for social insurance funds to ONA.	Forward workers' contributions for social insurance funds to ONA on a monthly basis.	30
							Employer contribution to ONA.	Pay employer contribution to ONA for all workers a monthly basis.	
							Employer contribution to OFATMA for work-related accident insurance.	Pay employer contribution to OFATMA for work-related accident insurance.	
							Collecting workers' contributions to ONA for social insurance funds.	Collect workers' contributions to ONA for social insurance funds from all workers.	
Wage Information, Use and Deduction	●	◐	○	○	○	○			
Contracting Procedures	○	○	○	○	○	○			
Discipline and Disputes	●	○	○	●	○	○			
Employment Contracts	●	●	●	●	●	●	Internal work rules.	Elaborate internal work rules.	30
Termination	○	●	○	●	◐	○		The factory has not reduced workforce size due to changes in operations during the last 6 months.	
								The factory has not terminated workers during the last 6 months.	

7	Occupational Safety and Health	Chemicals and Hazardous Substances	●	●	●	●	●	●	Inventory of chemicals and hazardous substances used in the workplace.	Keep an inventory of chemicals and hazardous substances used in the workplace.	30
									Labelling of chemicals and hazardous substances.	Label chemicals and hazardous substances.	
									Storage of chemicals and hazardous substances.	Store chemicals and hazardous substances correctly.	
									Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Display chemical safety data sheets for all chemicals and hazardous substances in the workplace.	
									Assessing, monitoring, preventing and/or limiting workers' exposure to hazardous substances.	Assess, monitor, prevent and/or limit workers' exposure to hazardous substances.	
									Training workers who work with chemicals and hazardous substances.	Train appropriate number of workers.	
									Washing facilities or cleansing materials in the event of chemical exposure.	Provide washing facilities or cleansing materials in the event of chemical exposure.	
		Emergency Preparedness	●	●	●	●	◐	●	Fire detection and alarm system.	Install fire detection and alarm system.	30
									Fire fighting equipment.	Maintain fire fighting equipment.	
									Training workers to use the fire fighting equipment	Train 10 per cent of workers to use the fire fighting equipment	
									Marking and/or posting of emergency exits and/or escape routes in the workplace.	Mark and/or post all emergency exits and/or escape routes in the workplace.	
									Accessible, unobstructed, and/or unlocked emergency exits during working hours, including overtime.	Keep all emergency exits accessible, unobstructed, and/or unlocked during working hours, including overtime.	
									Periodic emergency drills.	Conduct periodic emergency drills.	

Health Services and First Aid	●	●	◐	●	●	●	Health checks for workers who are exposed to work-related hazards. Safety and health risks to pregnant or nursing workers. Onsite medical facilities and staff. First aid boxes/supplies in the workplace. First aid training for workers. Pre-assignment and/or annual medical checks for workers.	Provide health checks for workers who are exposed to work-related hazards. Take action to reduce safety and health risks to pregnant or nursing workers. Install medical facilities and hire medical staff according to the Haitian labour code. Renew the content of the first aid boxes/supplies in the workplace. Train 10 per cent of workers in first aid. Pre-assignment and/or annual medical checks for workers.	30
OSH Management Systems	●	●	◐	●	●	●	Assessment of general occupational safety and health issues in the factory. Mechanisms to ensure cooperation between workers and management on OSH matters. Recording work-related accidents and diseases and/or submitting the record to OFATMA.	Conduct an assessment of general occupational safety and health issues in the factory. Keep the OSH committee active. Record work-related accidents and diseases and/or submitting the record to OFATMA.	30
Welfare Facilities	●	●	◐	●	●	●	Washing facilities and/or soap. Providing drinking water. Toilets. Eating area.	Provide adequate washing facilities and/or soap. Provide workers with enough free safe drinking water. Increase the number of toilets according to the Haitian Labour Code requirements Provide an eating area for workers.	30
Worker Accommodation	○	○	○	○	○	○			
Working Environment	○	●	○	○	○	○			

8	Working Time	Worker Protection	●	●	◐	●	●	●	Providing workers with personal protective clothing and equipment.	Provide workers with personal protective clothing and equipment.	30
									Training and encouragement of workers to use the personal protective equipment provided.	Train and encourage workers to use the personal protective equipment provided.	
									Accommodating standing workers.	Accommodate standing workers.	
									Training of workers to use machines and equipment safely.	Train workers to use machines and equipment safely.	
									Installing guards on all dangerous moving parts of machines and equipment.	Install guards on all dangerous moving parts of machines and equipment.	
									Posting safety warnings in the workplace.	Post safety warnings in the workplace.	
		Leave	○	○	●	●	●	●	Time off for breastfeeding breaks.	Provide time off for breastfeeding breaks to eligible workers.	18
		Overtime	●	●	○	●	○	○			
		Regular Hours	●	●	●	●	○	○			

Lucotex Manufacturing Co.

Location Port-au-Prince
No. of workers 73
Registration date 19 October 2010

Advisory Services and Training

03 October 2012 & 1st March 2013 Management intro meeting with management after the 5th factory report has been submitted in order to discuss assessment findings and work on the action plan.
11 october 2012 Meeting with management on the action plan submitted by the factory.
7 November 2012 Meeting with management on the action plan submitted by the factory.

	Compliance cluster	Compliance point	Assessment					Details of non-compliance	Improvement Priorities	Remediation Efforts	# months
			1*	2*	3*	4*	5*				
1	Child Labour	Child Labourers	☐	☐	☐	☐	☐				
		Documentation and Protection of Young Workers	☐	☐	☐	☐	☐				
		Hazardous Work	☐	☐	☐	☐	☐				
		Unconditional Worst Forms	☐	☐	☐	☐	☐				
2	Discrimination	Gender	☐	☐	☐	☐	☒	Pregnancy tests or use of contraceptives as a condition of employment.	Do not require pregnancy tests or the use of contraceptives as a condition of employment.		
		Other Grounds	☐	☐	☐	☐	☐				
		Race and Origin	☐	☐	☐	☐	☐				
		Religion and Political Opinion	☐	☐	☐	☐	☐				
3	Forced Labour	Bonded Labour	☐	☐	☐	☐	☐				
		Coercion	☐	☐	☐	☐	☐				
		Forced Labour and Overtime	☐	☐	☐	☐	☐				
		Prison Labour	☐	☐	☐	☐	☐				
4	Freedom of Association and Collective Bargaining	Collective Bargaining	☐	☐	☐	☐	☐				
		Interference and Discrimination	☐	☐	☐	☐	☐				
		Strikes	☐	☐	☐	☐	☐				
		Union Operations	☐	☐	☐	☐	☐				
5	Compensation	Method of Payment	☐	☐	☐	☐	☐				

Minimum Wages	☐	☒	☒	☒	☒	Piece rate level.	Set the piece rate at a level where workers earn at least 300 Gourde/day for a regular hour workday.	18	
Overtime Wages	☐	☐	☐	☐	☐				
Paid Leave	☐	☐	☐	☐	☒	Payment for weekly rest days.	Pay correctly for weekly rest day.		
Premium Pay	☐	☐	☐	☐	☐				
Social Security and Other Benefits	☒	☒	☐	☐	☒	Forwarding of workers' contributions for social insurance funds to ONA.	Regularly forward workers' contribution to ONA.		
						Employer contribution to ONA.	Regularly forward employers' contribution to ONA.		
						Employer contribution to OFATMA for work-related accident insurance.	Forward 3% of workers salary to OFATMA.		
Wage Information, Use and Deduction	☐	☐	☐	☐	☐				
Contracting Procedures	☐	☐	☐	☐	☐				
Discipline and Disputes	☐	☐	☐	☐	☐				
Employment Contracts	☒	☐	☐	☒	☒	Internal work rules.	Get approval of internal work rules by the Ministry of Labour.	6	
Termination	☒	☐	☐	☐	☐				
Chemicals and Hazardous Substances	☐	☐	☒	☐	☐				
Emergency Preparedness	☒	☒	☒	☐	☒	Fire detection and alarm system.	Install fire alarm system.	24	
						Training workers to use the fire fighting equipment.	Train 10% of workers on the use of fire fighting equipment.		
						Marking or posting of emergency exits and/or escape routes in the workplace.	Define escape routes, post evacuation plan and clearly mark escape route.		
						Periodic emergency drills.	Conduct emergency drills twice a year.		
Health Services and First Aid	☒	☒	☒	☐	☐	Onsite medical facilities and staff.	Have a doctor's visit per week.	The factory has now a nurse on site for the workers.	24
						First aid training for workers.	First aid training for workers.		
						Pre-assignment and/or annual medical checks for workers.	Provide annual medical checks for workers.	The factory provided first aid boxes/supplies in the workplace.	

OSH Management Systems	●	●	●	●	◐	Written OSH policy.	Write an OSH policy.	24
						Assessment of general occupational safety and health issues in the factory.	Conduct a monthly assessment of general occupational safety and health issues in the factory.	
						Mechanisms to ensure cooperation between workers and management on OSH matters.	Ensure cooperation on OSH matters between workers and management.	
							The factory forwards accidents reports to OFATMA.	
Welfare Facilities	●	◐	◐	◐	●	Washing facilities and/or soap.	Provide soap for workers.	24
						Eating area.	Provide an eating area in the workplace.	
Worker Accommodation	○	○	○	○	○			
Working Environment	●	◐	●	●	●	Workplace lighting.	Improve lighting in the workplace.	24
Worker Protection	●	●	◐	◐	◐	Providing workers with personal protective clothing and equipment.	Provide all workers with personal protective clothing and equipment.	24
						Training and encouragement of workers to use the personal protective equipment provided.	Train and encourage the workers to use PPE.	
						Accommodating standing workers.	Provide fatigue mats to workers.	
						Training of workers to use machines and equipment safely.	Train of workers to use machines and equipment safely.	
						Installing guards on all dangerous moving parts of machines and equipment.	Install guards on machines that need them. Post safety warning in the workplace.	
						Installing, grounding, and/or maintaining electrical wires, switches, and/or plugs	Fix all electrical hazards.	
Working Time	Leave	○	○	●	●	Time off for breastfeeding breaks.	Provide breastfeeding breaks to workers entitled to it.	12
	Overtime	●	○	○	○			
	Regular Hours	●	◐	●	◐	Working time records.	Put a system in place that ensures working time records reflect the hours actually worked.	24

Magic Sewing Manufacturing S.A.

Location Port-au-Prince
No. of workers 394
Registration date 1 October 2009

Advisory Services and Training

05 October 2012 & 27 February 2013 Management intro meeting with management after the 5th factory report has been submitted in order to discuss assessment findings and work on the action plan.
29-31 January 2013. Negotiation Skills Training provided by ITC/ILO.

	Compliance cluster	Compliance point	Assessment						Details of non-compliance	Improvement Priorities	Remediation Efforts	# Months
			1*	2*	3*	4*	5*	6*				
1	Child Labour	Child Labourers	☐	☐	☐	☐	☐	☐				
		Documentation and Protection of Young Workers	☐	☐	☐	☐	☐	☐				
		Hazardous Work	☐	☐	☐	☐	☐	☐				
		Unconditional Worst Forms	☐	☐	☐	☐	☐	☐				
2	Discrimination	Gender	☒	☒	☐	☐	☐	☐				
		Other Grounds	☐	☐	☐	☐	☐	☐				
		Race and Origin	☐	☐	☐	☐	☐	☐				
		Religion and Political Opinion	☒	☒	☐	☐	☐	☐				
3	Forced Labour	Bonded Labour	☐	☐	☐	☐	☐	☐				
		Coercion	☐	☐	☐	☐	☐	☐				
		Forced Labour and Overtime	☐	☐	☐	☒	☐	☐				
		Prison Labour	☐	☐	☐	☐	☐	☐				
4	Freedom of Association and Collective Bargaining	Collective Bargaining	☐	☐	☐	☐	☐	☐				
		Interference and Discrimination	☐	☐	☐	☐	☐	☐				
		Strikes	☐	☐	☐	☐	☐	☐				
		Union Operations	☐	☐	☐	☐	☐	☐				
5	Compensation	Method of Payment	☐	☐	☐	☐	☐	☐				
		Minimum Wages	☒	☐	☒	☒	☒	☒	Piece rate level.	Set the piece rate at a level where workers earn at least 300 Gourde/day for a regular hour workday.		30

6	Contracts and Human Resources	Overtime Wages	●	○	○	○	○	●	Payment for ordinary overtime.	Ensure that overtime hours worked are paid 50% above the normal wage to all workers.	
		Paid Leave	●	○	○	○	○	○			
		Premium Pay	○	○	○	○	○	○			
		Social Security and Other Benefits	○	●	○	○	○	○			
		Wage Information, Use and Deduction	●	◐	○	●	●	●	Deductions from workers' wages.	Ensure that no unauthorized deductions from workers' wages are made and properly document in the payroll any deductions made.	12
									Payroll records.	Remediate the inconsistencies in the payroll.	
		Contracting Procedures	○	○	○	○	○	○			
		Discipline and Disputes	○	○	○	○	○	●	Disciplinary measures.	Ensure that disciplinary measures comply with legal requirements.	
		Employment Contracts	○	●	◐	◐	○	◐	Employment contract's compliance with the labour code, collective agreement and/or internal work rules.	Ensure that contracts comply with the Haitian Labour code.	
									Internal work rules.	Ensure that internal work rules comply with the Haitian Labour code.	
7	Occupational Safety and Health	Termination	○	●	◐	○	◐	○		The factory reached an agreement with workers on the daily break period.	
										The factory is now provided payment for annual leave upon termination of worker	
										The factory is now provided annual salary supplement or bonus upon termination	
		Chemicals and Hazardous Substances	●	◐	◐	◐	◐	●	Labelling of chemicals and hazardous substances.	Label all chemicals and hazardous substances in the workplace.	30
									Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Keep and post MSDS for all chemicals and hazardous substances in the workplace.	
									Training workers who work with chemicals and hazardous substances.	Train workers who work with chemicals and hazardous substances.	
									Washing facilities or cleansing materials in the event of chemical exposure.	Provide washing facilities or cleansing materials in all areas where chemical or hazardous substances are used.	

Emergency Preparedness	●●●●●●	Fire-fighting equipment.	Ensure that all fire-fighting equipment is inspected and functional and access to fire-fighting equipment is not obstructed.	30
		Training workers to use the fire-fighting equipment.	Train at least 10% of the workforce in the use of the fire-fighting equipment.	
		Marking or posting of emergency exits and/or escape routes in the workplace.	Update the evacuation plan.	
			The factory is now conducting emergency twice a year. Escape routes are clearly marked.	
Health Services and First Aid	●●●●●●	Health checks for workers who are exposed to work-related hazards.	Provide health check to workers exposed to work-related hazards.	30
		Onsite medical facilities and staff.	Increase onsite medical staff.	
		First-aid training for workers.	Train at least 10% of the workforce in first aid as recommended by Better Work.	
		Pre-assignment and/or annual medical checks for workers.	Ensure that medical checks are provided to workers on pre-assignment and annually.	
OSH Management Systems	●●●●○●	Assessment of general occupational safety and health issues in the factory.	Conduct an assessment of general occupational safety and health.	
		Mechanisms to ensure cooperation between workers and management on OSH matters.	Ensure cooperation between workers and management on OSH matters.	
Welfare Facilities	●●●●●●	Washing facilities and/or soap.	Ensure that soap is always available in the workplace.	30
		Toilets.	Provide the amount of toilets required by the Haitian Labour Code.	
		Eating area.	Provide an adequate eating area that can accommodate 90% of the workforce	
Worker Accommodation	○○○○○○○			
Working Environment	○○○○●○		The factory has lowered the temperature in the workplace.	
			The factory has increased the lighting level in the workplace.	

8	Working Time	Worker Protection		Providing workers with personal protective clothing and equipment. Training of workers to use machines and equipment safely. Installing guards on all dangerous moving parts of machines and equipment.	Provide adequate PPE for workers in the spot cleaning area. Train workers on the use of machines and equipment. Install guards on all dangerous moving parts of machines and equipment.	The factory is now providing equipment to workers for heavy lifting in the workplace	30
		Leave				The factory has now the policy in place for breastfeeding breaks and all the workers entitled to it are aware of that.	
		Overtime		Voluntary overtime.	Ensure that overtime is voluntary	The factory has obtained MAST authorization to work overtime and on Sundays. The factory has reduced the overtime hours worked to comply with legal requirements.	30
		Regular Hours		Working time records.	Put in place an accurate attendance system to record all the working hours.	The factory has set up a punching system that allows workers right now to punch by themselves. The factory has consulted the workers on the daily break period	30

Modas Gloria Apparel S.A.

Location Port-au-Prince
No. of workers 885
Registration date 8 October 2009

Advisory Services and Training:

09 October 2012 Management intro meeting with management after the 5th factory report has been submitted in order to discuss assessment findings and work on the action plan.
11 December 2012 Meeting with management on industrial relation issue.
11Decosmber 2012: Management Intro Meeting with management after the factory report has been submitted in order to discuss assessment findings
29-31 January 2013 Negotiation Skills Training provided by ITC/ILO.
26 February 2013: Meeting with management in order to discuss assessment findings and more specifically the FOA issues

	Compliance cluster	Compliance point	Assessment						Details of non-compliance	Improvement Priorities	Remediation Efforts	# Months
			1*	2*	3*	4*	5*	6*				
1	Child Labour	Child Labourers	☐	☐	☐	☐	☐	☐				
		Documentation and Protection of Young Workers	☐	☐	☐	☐	☐	☐				
		Hazardous Work	☐	☐	☐	☐	☐	☐				
		Unconditional Worst Forms	☐	☐	☐	☐	☐	☐				
2	Discrimination	Gender	☐	☐	☐	☐	☐	☐				
		Other Grounds	☐	☐	☐	☐	☐	☐				
		Race and Origin	☐	☐	☐	☐	☐	☐				
		Religion and Political Opinion	☐	☐	☐	☐	☐	☐				
3	Forced Labour	Bonded Labour	☐	☐	☐	☐	☐	☐				
		Coercion	☐	☐	☐	☐	☐	☐				
		Forced Labour and Overtime	☐	☐	☐	☐	☐	☐				
		Prison Labour	☐	☐	☐	☐	☐	☐				
4	Freedom of Association and Collective Bargaining	Collective Bargaining	☐	☐	☐	☐	☐	☐				
		Interference and Discrimination	☐	☐	☐	☐	☐	●	Attempt(s) to interfere with, manipulate or control the union(s).	Ensure not to interfere, manipulate or control the union (s).		
		Strikes	☐	☐	☐	☐	☐	☐				
		Union Operations	●	☐	☐	☐	☐	☐				
5	Compensation	Method of Payment	☐	☐	☐	☐	☐	☐				

Minimum Wages	●	○	●	●	●	●	Piece rate level.	Set the piece rate at a level where workers earn at least 300 Gourde/day for a regular hour workday.	18
Overtime Wages	○	○	○	●	○	○			
Paid Leave	●	◐	○	○	○	○			
Premium Pay	○	○	○	○	○	○			
Social Security and Other Benefits	●	◐	○	●	○	●	Forwarding of workers’ contributions for social insurance funds to ONA.	Regularly forward workers’ contributions for social insurance funds to ONA.	
							Employer contribution to ONA.	Regularly forward employer’s contributions for social insurance funds to ONA.	
Wage Information, Use and Deduction	●	○	○	○	○	○			
Contracting Proc.	○	○	○	○	○	○			
Discipline and Disputes	●	○	○	○	○	○			
Employment Contracts	●	●	●	○	●	○			The factory has MAST approval for the internal work rules
Termination	●	○	○	○	○	●	Reasons for termination.	Ensure that workers are terminated for valid reasons and include the reason of termination in the workers files.	
Chemicals and Hazardous Substances	●	◐	●	◐	●	●	Labelling of chemicals and hazardous substances.	Label all chemicals and hazardous substances used in the workplace.	30
							Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Keep and post MSDS in the workplace.	
							Training workers who work with chemicals and hazardous substances.	Train workers who work with chemicals and hazardous substances	
							Washing facilities or cleansing materials in the event of chemical exposure.	Ensure that washing facilities or cleansing materials are available in the event of chemical exposure.	
Emergency Preparedness	●	◐	●	◐	●	◐	Training workers to use the fire-fighting equipment.	Train at least 10% of the workforce in the use the fire-fighting equipment.	30
							Accessible, unobstructed, and/or unlocked emergency exits during working hours, including overtime.	Ensure that all marked exits are unlocked during working hours and overtime.	
							Periodic emergency drills.	Conduct periodic emergency drills twice a year.	
									The factory has marked and posted exits and escape routes in the workplace.

	Health Services and First Aid	●	◐	●	●	●	●	Health checks for workers who are exposed to work-related hazards.	Provide health check to workers exposed to work-related hazards.	30
								Safety and health risks to pregnant or nursing workers.	Address health and safety risks for pregnant or nursing workers.	
								Onsite medical facilities and staff.	Increase onsite medical staff.	
								First-aid training for workers.	Train at least 10% of the workforce in first aid as recommended by Better Work.	
								Pre-assignment and/or annual medical checks for workers.	Provide annual medical checks for workers.	
	OSH Management Systems	●	◐	○	●	○	●	Assessment of general occupational safety and health issues in the factory.	Conduct assessment of general occupational safety and health issues at the factory.	
								Recording work-related accidents and diseases and/or submitting the record to OFATMA.	Record work-related accidents and diseases and submit the record to OFATMA	
	Welfare Facilities	●	◐	◐	◐	●	◐	Toilets.	Provide the amount of toilets required by the Haitian Labour Code.	30
									The factory has an adequate eating area.	
									The factory is now providing adequate washing facilities and/or soap	
	Worker Accommod.	○	○	○	○	○	○			
8	Working Environ-ment	○	○	●	◐	●	◐	Workplace noise levels.	Reduce the noise level in the workplace.	18
									The factory has reduced the temperature level in the workplace.	
	Worker Protection	●	◐	◐	◐	◐	●	Providing workers with personal protective clothing and equipment.	Provide adequate PPE for workers in the spot cleaning area.	30
								Training of workers to use machines and equipment safely.	Train workers on the use of machines and equipment.	
								Accommodating standing workers.	Provide fatigue mats or foot rest to standing workers.	
								Installing guards on all dangerous moving parts of machines and equipment.	Install guards on all dangerous moving parts of machines and equipment.	
								Installing, grounding, and/or maintaining electrical wires, switches, and/or plugs.	Ensure that electrical wires, switches and plugs are properly installed, grounded and maintained.	
	Working Time	○	○	●	○	●	○			The factory implements breastfeeding policy.
		●	●	○	●	○	●	Authorization from the Department of Labour for overtime.	Obtain authorization from the Ministry of Labour before working overtime hours and Sundays.	
		●	◐	○	●	○	○			

Multiwear S.A.

Location Port-au-Prince
No. of workers 2010
Registration date 5 October 2009

Advisory Services and Training

7 September 2012. Social Dialogue meeting
21 September 2012 Management Intro Meeting with Social Compliance Director and Cost Control Director after the factory report has been submitted to discuss assessment findings and work on the action plan.
22 November 2012 Social Dialogue meeting
28 September 2012 1st Factory cluster meeting with union cell.
03-04 October 2012 Social Dialogue Training provided by ILO for Social Compliance Director.
10 October 2012 1st Factory cluster meeting with union cell.
11 December 2012 Follow-up meeting on progress of issues chosen as priority in the improvement plan.
19 December 2012 Advisory on OSH assessment techniques.
24 January 2013 Social Dialogue meeting
29-31 January 2013 Negotiation Skills Training provided by ITC/ILO for Social Compliance Director and Social Compliance Assistant.

Compliance cluster	Compliance point	1*	Assessment			4*	5*	6*	Details of non-compliance	Improvement Priorities	Remediation Efforts	# Months
			2*	3*								
1	Child Labour	Child Labourers	○	○	○	○	○	○				
		Documentation and Protection of Young Workers	○	○	○	●	○	○				
		Hazardous Work	○	○	○	○	○	○				
		Unconditional Worst Forms	○	○	○	○	○	○				
2	Discrimination	Gender	○	○	○	○	○	○				
		Other Grounds	○	○	○	○	○	○				
		Race and Origin	○	○	○	○	○	○				
		Religion and Political Opinion	○	○	○	○	○	○				
3	Forced Labour	Bonded Labour	○	○	○	○	○	○				
		Coercion	●	○	○	○	○	○				
		Forced Labour and Overtime	○	○	○	○						
		Prison Labour	○	○	○	○	○	○				
4	Freedom of Association and Collective	Collective Bargaining	○	○	○	○	○	○				

5	Bargaining	Interference and Discrimination	☐	☐	☐	☐	☒	☐		Union members are allowed to meet without management's interference.	
										The factory developed better relationship with union's representatives. The unjustified differences of wages between union representatives and other workers have been eliminated.	
		Strikes	☐	☐	☐	☐	☐	☐			
	Compensation	Union Operations	☒	☐	☐	☐	☐	☐			
		Method of Payment	☐	☐	☐	☐	☐	☐			
		Minimum Wages	☒	☐	☐	☒	☒	☒	Piece rate level.	Set piece rate at a level such that workers earn at least 300 Gourdes per day for ordinary hours of work.	12
		Overtime Wages	☒	☐	☐	☐	☐	☐			
		Paid Leave	☒	☐	☐	☐	☐	☐			
		Premium Pay	☐	☐	☐	☐	☐	☐			
		Social Security and Other Benefits	☒	☒	☒	☒	☒	☐	Forwarding of workers' contributions for social insurance funds to ONA.	Forward workers' contributions for social insurance funds to ONA on a monthly basis.	30
									Employer contribution to ONA.	Pay employer contribution to ONA on a monthly basis.	
	6	Wage Information, Use and Deduction	☐	☐	☐	☐	☐	☒	Payroll records.	Keep accurate payroll records.	
		Contracting Procedures	☐	☐	☐	☐	☐	☐			
		Discipline and Disputes	☐	☐	☐	☒	☐	☐			
		Employment Contracts	☒	☐	☐	☒	☐	☐			
		Termination	☐	☐	☐	☒	☒	☐		The factory has not reduced workforce size due to changes in operations during the last 6 months.	

7	Occupational Safety and Health	Chemicals and Hazardous Substances	●	◐	◐	●	●	◐	Inventory of chemicals and hazardous substances used in the workplace.	Keep an inventory of chemicals and hazardous substances used in the workplace.		30
									Labelling of chemicals and hazardous substances.	Label of chemicals and hazardous substances.		
									Washing facilities or cleansing materials in the event of chemical exposure.	Provide washing facilities or cleansing materials in the event of chemical exposure.	MSDS where installed in building 37 in the area where the ink mixture is prepared.	
		Emergency Preparedness	●	◐	◐	●	●	●	Fire fighting equipment.	Maintain fire fighting equipment.		30
									Training workers to use the fire fighting equipment.	Train 10 per cent workers to use the fire fighting equipment		
									Marking or posting of emergency exits and/or escape routes in the workplace.	Mark or post all emergency exits and/or escape routes in the workplace.		
									Accessible, unobstructed, and/or unlocked emergency exits during working hours, including overtime.	Ensure that all emergency exits are accessible, unobstructed, and/or unlocked during working hours, including overtime.		
		Health Services and First Aid	●	◐	◐	●	●	◐	Health checks for workers who are exposed to work-related hazards.	Provide health checks for workers who are exposed to work-related hazards.	The factory hired a doctor who will be responsible for providing health checks for workers who are exposed to work related hazards but he just started working on the day of the assessment.	30
									Onsite medical facilities and staff.	Install onsite medical facilities and hire additional medical staff as required by the Haitian labour code.	The factory hired a doctor and a new medical facility is being installed in building 38.	
									First-aid training for workers.	Provide first-aid training for workers.		
									Pre-assignment and/or annual medical checks for workers.	Provide pre-assignment and/or annual medical checks for workers.	The factory hired a doctor who will be responsible for providing pre-assignment and/or annual medical checks for workers.	
		OSH Management Systems	●	◐	○	●	○	○				

8		Welfare Facilities	●	◐	●	●	●	◐	Washing facilities and/or soap.	Provide adequate washing facilities and/or soap.	30
									Toilets.	Increase the number of toilets according to the Haitian Labour Code requirements	
									Eating area.	Eating area.	
										The water has been tested and the filters of the water filtration system replaced.	
		Worker Accommodation	○	○	○	○	○	○			
		Working Environment	●	●	●	○	●	●	Workplace temperature.	Decrease temperature levels in the workplace.	6
									Workplace lighting.	Increase light levels in the workplace.	
		Worker Protection	●	◐	●	●	●	●	Providing workers with personal protective clothing and equipment.	Provide all eligible workers with personal protective clothing and equipment.	30
									Accommodating standing workers.	Provide fatigue mats and/or footrest to all standing workers.	
									Installing guards on all dangerous moving parts of machines and equipment.	Install guards on all dangerous moving parts of machines and equipment.	
									Installing, grounding, and/or maintaining electrical wires, switches, and/or plugs.	Ensure that all electrical wires, switches, and/or plugs are properly maintained.	
	Working Time	Leave	○	○	●	●	●	○			The factory has a breastfeeding policy. Breastfeeding break is offered to all eligible nursing mothers.
		Overtime	●	◐	◐	●	○	○			
		Regular Hours	●	◐	●	●	○	○			

One World Apparel S.A.

Location Port-au-Prince
No. of workers 1358
Registration date 27 October 2009

Advisory Services and Training

6 & 7 September 2012	Workplace Communication 1 & 2 for 16 supervisors and 20 workers.
7 September 2012	Social Dialogue meeting
22 September 2012	Social Dialogue meeting
22 September 2012	Advisory Service on Freedom of Association.
03 October 2012	Management intro meeting with management after the 5 th factory report has been submitted in order to discuss assessment findings and work on the action plan.
03-04 October 2012	Social Dialogue Training provided by ILO.
11 October 2012	Follow-up visit on improvements.
07 November 2012	Follow-up visit on improvements.
24 January 2013	Social Dialogue meeting
29-31 January 2012	Negotiation Skills Training provided by ITC/ILO for HR Manager

Compliance cluster	Compliance point	Assessment					Details of non-compliance	Improvement Priorities	Remediation Efforts	#
		1*	2*	3*	4*	5*				Months
1	Child Labour	Child Labourers	☐	☐	☐	☐	☐			
		Documentation and Protection of Young Workers	☐	☐	☐	☐	☐			
		Hazardous Work	☐	☐	☐	☐	☐			
		Unconditional Worst Forms	☐	☐	☐	☐	☐			
2	Discrimination	Gender	☐	☐	☐	☐	☐			
		Other Grounds	☐	☐	☐	☐	☐			
		Race and Origin	☐	☐	☐	☐	☐			
		Religion and Political Opinion	☐	☐	☐	☐	☐			
3	Forced Labour	Bonded Labour	☐	☐	☐	☐	☐			
		Coercion	☐	☐	☐	☐	☐			
		Forced Labour and Overtime	☐	☐	☐	☐	☐			
		Prison Labour	☐	☐	☐	☐	☐			
4	Freedom of Association and Collective	Collective Bargaining	☐	☐	☐	☐	☐			

5	Bargaining	Interference and Discrimination	☐	☐	☒	☐	☐	Management stated that Union representatives will be traited as per convention 98 and 87.	
		Strikes	☐	☐	☐	☐	☐	Management stated that the Union representatives at the workplace need to set up an appointment with the HR department & present proper identification at the time of the meeting.	
		Union Operations	☐	☐	☒	☐	☐		
5	Compensation	Method of Payment	☐	☐	☐	☐	☐		
		Minimum Wages	☒	☐	☒	☒	☒	Piece rate level.	Set the piece rate at a level where workers earn at least 300 Gourdes per day for ordinary hours of work
		Overtime Wages	☐	☐	☐	☐	☐		
		Paid Leave	☒	☐	☐	☐	☒	Payment for weekly rest days.	Pay correctly for weekly rest day.
		Premium Pay	☐	☐	☐	☐	☐		
		Social Security and Other Benefits	☒	☐	☒	☐	☒	Forwarding of workers' contributions for social insurance funds to ONA.	Regularly forward workers' contribution to ONA before the 10 th of each month.
								Employer contribution to ONA.	Regularly forward employers' contribution to ONA before the 10 th of each month.
6	Contracts and Human Resources	Wage Information, Use and Deduction	☒	☐	☐	☐	☐		
		Contracting Procedures	☐	☐	☐	☐	☐		
		Discipline and Disputes	☐	☐	☐	☐	☐		
		Employment Contracts	☐	☒	☒	☒	☐		The factory updated the internal work rules in order to comply with legal requirements on the daily break for workers.
		Termination	☐	☐	☒	☐	☐		
7	Occupational Safety and Health	Chemicals and Hazardous Substances	☒	☐	☒	☐	☐		The factory labelled all chemicals and hazardous substances.
		Emergency Preparedness	☒	☐	☒	☐	☐		The factory updated the evacuation plan.

8	Working Time	Health Services and First Aid	●●●◐◐	Health checks for workers who are exposed to work-related hazards.	Provide medical checks annually for all workers and bi-annually for workers exposed to chemicals.	24
				Onsite medical facilities and staff.	Increase the number of nurses and of weekly doctor visits.	
				Pre-assignment and/or annual medical checks for workers.	Provide pre-assignment and/or annual medical checks for workers.	
						The factory provided first-aid training to 10% of the workers.
						The factory provided a sufficient number of first aid boxes and the access time to these was reduced.
		OSH Management Systems	●◐○○○			
		Welfare Facilities	●◐●●◐	Toilets.	Provide the amount of toilets required by the Haitian Labour Code.	24
						The factory increased the capacity of the eating area.
		Worker Accommodation	○○○○○			
		Working Environment	●○○●○			The factory reduced the temperature in the workplace.
8	Working Time					The factory increased the light level in the workplace.
		Worker Protection	●◐●●◐	Installing guards on all dangerous moving parts of machines and equipment.	Install missing guards on machines.	24
						The factory reinforced training of workers on the use of PPE
						The factory provided anti-fatigue mats and/or footrest to standing workers.
						The factory reinforced training of workers on the safe use of the machines.
						The factory ensured that a sufficient number of safety warnings are posted in the workplace.
		Leave	○○○○○			
		Overtime	●●○●○			The factory obtained an authorization from the Department of Labour for overtime hour's work.
		Regular Hours	●◐●○○			

Pacific Sports S.A.

Location Port-au-Prince
No. of workers 1504
Registration date 11 November 2009

Advisory Services and Training

13 September 2012 Management Intro Meeting with Factory Owner and Plant Manager after the factory report has been submitted to discuss assessment findings and work on the action plan.
14 September 2012 Meeting with management on the assessment report and remediation actions.
26 September 2012 PICC meeting
08 November 2012 PICC meeting
06 December 2012 PICC meeting
29-31 January 2013 Negotiation Skills Training provided by ITC/ILO for Accountant.

Compliance cluster	Compliance point	Assessment						Details of non-compliance	Improvement Priorities	Remediation Efforts	# Months
		1*	2 *	3*	4*	5*	6*				
1	Child Labour	Child Labourers	☐	☐	☐	☐	☐	☐			
		Documentation and Protection of Young Workers	☐	☐	☐	☐	☐	☐			
		Hazardous Work	☐	☐	☐	☐	☐	☐			
		Unconditional Worst Forms	☐	☐	☐	☐	☐	☐			
2	Discrimination	Gender	☒	☐	☐	☐	☐	☐			
		Other Grounds	☐	☐	☐	☐	☐	☐			
		Race and Origin	☐	☐	☐	☐	☐	☐			
		Religion and Political Opinion	☐	☐	☐	☐	☐	☐			
3	Forced Labour	Bonded Labour	☐	☐	☐	☐	☐	☐			
		Coercion	☐	☐	☐	☐	☐	☐			
		Forced Labour and Overtime	☐	☐	☐	☐	☐	☐			
		Prison Labour	☐	☐	☐	☐	☐	☐			
4	Freedom of Association and Collective Bargaining	Collective Bargaining	☐	☐	☐	☐	☐	☐			
		Interference and Discrimination	☐	☐	☐	☐	☐	☐			
		Strikes	☐	☐	☐	☒	☐	☐			
		Union Operations	☒	☐	☐	☐	☐	☐			

5	Compensation	Method of Payment	☐	☐	☐	☐	☐	☐			
		Minimum Wages	☒	☐	☒	☒	☒	☒	Piece rate level.	Set the piece rate at a level where workers earn at least 300 Gourde/day for a regular hour workdays.	18
		Overtime Wages	☒	☐	☐	☐	☐	☐			
		Paid Leave	☒	☐	☐	☐	☐	☐			
		Premium Pay	☐	☐	☐	☐	☐	☐			
		Social Security and Other Benefits	☐	☒	☐	☒	☐	☐			
		Wage Information, Use and Deduction	☐	☐	☒	☐	☐	☐			
6	Contracts and Human Resources	Contracting Procedures	☐	☐	☐	☐	☐	☐			
		Discipline and Disputes	☐	☐	☐	☐	☐	☒	Disciplinary measures.	Keep appropriate records for disciplinary measures.	
		Employment Contracts	☐	☒	☒	☐	☐	☐			
		Termination	☒	☐	☐	☒	☐	☒	Reductions in workforce size due to changes in operations.	Inform MAST when reducing workforce size due to changes in operations.	
7	Occupational Safety and Health	Chemicals and Hazardous Substances	☒	☐	☐	☒	☐	☒	Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Post chemical safety data sheets for all chemicals and hazardous substances in the workplace.	
									Washing facilities or cleansing materials in the event of chemical exposure.	Provide washing facilities or cleansing materials in the event of chemical exposure.	
		Emergency Preparedness	☐	☒	☐	☒	☒	☐		Building 25 is only dedicated to storage and no workers are allowed to stay in this building.	
										Building 25 is only dedicated to storage and no workers are allowed to stay in this building.	
		Health Services and First Aid	☒	☒	☒	☐	☒	☒	Health checks for workers who are exposed to work-related hazards.	Provide health checks for workers who are exposed to work-related hazards.	30
									Onsite medical facilities and staff.	Increase the number of medical staff according to the requirements of the Haitian Labour Code.	
									First-aid training for workers.	Train 10 per cent of workforce in first-aid.	
									Pre-assignment and/or annual medical checks for workers.	Provide pre-assignment and/or annual medical checks for workers.	
		OSH Management Systems	☐	☒	☐	☐	☐	☐			

8	Working Time	Welfare Facilities	●	●	◐	◐	●	◐	Providing drinking water.	Providing drinking water.	30
									Toilets.	Increase the number of toilets according to the Haitian Labour Code requirements	
										The factory ensured that all the toilets were clean and in good condition. However, they need to increase the number.	
										The factory ensures that soap is available all day.	
		Worker Accommodation	○	○	○	○	○	○			
		Working Environment	○	○	●	●	●	◐	Workplace temperature.	Decrease temperature levels in the workplace.	18
									Workplace lighting.	Increase light levels in the workplace.	
										The factory repaired the lamps. However, the light level is still under better work requirements.	
		Worker Protection	●	◐	○	●	●	●	Providing workers with personal protective clothing and equipment.	Providing workers with personal protective clothing and equipment.	12
									Accommodating standing workers.	Provide fatigue mats and/or foot rest to standing workers.	
									Installing guards on all dangerous moving parts of machines and equipment.	Install guards on all dangerous moving parts of machines and equipment.	
	Working Time	Leave	○	○	●	●	○	○			
		Overtime	●	●	◐	○	○	○			
		Regular Hours	●	◐	◐	●	○	○			

Palm Apparel S.A.

Location	Port-au-Prince
No. of workers	1488
Registration date	17 November 2009

Advisory Services and Training

28 & 29 August 12:	Workplace communication 1 and 2 for 18 supervisors and 72 workers.
09 October 2012 & 4 th March 2013	Management intro meeting with management after the 5 th factory report has been submitted in order to discuss assessment findings and work on the action plan.
21 13 November 2012	Advisory visit on payroll records.

	Compliance cluster	Compliance point	Assessment						Details of non-compliance	Improvement Priorities	Remediation Efforts	# Months
			1*	2*	3*	4*	5*	6*				
1	Child Labour	Child Labourers	○	○	○	○	○	○				
		Documentation and Protection of Young Workers	○	○	○	○	○	○				
		Hazardous Work	○	○	○	○	○	○				
		Unconditional Worst Forms	○	○	○	○	○	○				
2	Discrimination	Gender	○	○	○	●	○	○			Training material on sexual harassment, discrimination and communication has been implemented by management	
		Other Grounds	○	○	○	○	○	○				
		Race and Origin	○	○	○	○	○	○				
		Religion and Political Opinion	○	○	○	○	○	○				
3	Forced Labour	Bonded Labour	○	○	○	○	○	○				
		Coercion	○	○	○	○	○	○				
		Forced Labour and Overtime	○	○	○	○	○	○				
		Prison Labour	○	○	○	○	○	○				
4	Freedom of Association and Collective Bargaining	Collective Bargaining	○	○	○	○	○	○				
		Interference and Discrimination	○	○	○	○	○	○				
		Strikes	○	○	○	○	○	○				
		Union Operations	○	○	○	○	○	○				
5	Compensation	Method of Payment	○	○	○	○	○	○				

6		Minimum Wages	●	○	●	●	●	●	Piece rate level.	Increase the piece rate level such as piece rate workers could earn 300 Gourdes.	18
		Overtime Wages	○	○	○	○	○	○			
		Paid Leave	○	○	○	○	○	○			
		Premium Pay	○	○	○	○	○	○			
		Social Security and Other Benefits	●	◐	◐	●	○	●	Forwarding of workers' contributions for social insurance funds to ONA.	Collects and pays the required amount for ONA on a monthly basis.	
								Employer contribution to ONA.	Pays the required amount for work related accidents to OFATMA.		
		Wage Information, Use and Deduction	●	○	○	○	○	○			
	Contracts and Human Resources	Contracting Procedures	○	○	○	○	○	○			
		Discipline and Disputes	○	○	○	●	●	○		The factory is treating all workers with respect.	
		Employment Contracts	●	●	◐	●	○	○			
Termination		○	●	○	○	○	○				
7	Occupational Safety and Health	Chemicals and Hazardous Substances	●	◐	◐	●	◐	◐	Storage of chemicals and hazardous substances.	Provide storage area of chemicals and hazardous substances.	30
								Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Display chemical safety data sheets for all chemicals and hazardous substances in the workplace.	The factory labelled all chemicals and hazardous substances.	
										The factory provided washing facilities or cleansing materials in the event of chemical exposure.	
		Emergency Preparedness	●	◐	◐	●	◐	○		The factory installed fire detection and alarm system.	
										The factory trained workers on the use the fire-fighting equipment.	
									The factory conducted periodic emergency drills.		

	Health Services and First Aid	●	●	◐	●	◐	◐	Onsite medical facilities and staff.	Provide appropriate onsite medical facilities and staff.	30
								First-aid training for workers.	Train workers in first-aid training.	
								Pre-assignment and/or annual medical checks for workers.	Provide pre-assignment and annual medical checks for workers.	
									The factory provided health checks for workers who are exposed to work-related hazards.	
	OSH Management Systems	●	◐	◐	●	◐	○			
									The factory developed a written OSH policy.	
									Periodic OSH assessment reports have been seen and will be implement in the 2 new buildings.	
	Welfare Facilities									30
		●	●	◐	●	●	●	Washing facilities and/or soap.	Provide washing facilities and/or soap	
								Workplace cleanliness.	Kept the workplace clean and tidy.	
								Toilets.	Increase the number of toilets.	
	Worker Accommodation									
		○	○	○	○	○	○			
	Working Environment	●	○	○	●	●	○			
									The factory lowered the temperature level.	
	Worker Protection									30
		●	◐	◐	●	◐	◐	Installing guards on all dangerous moving parts of machines and equipment.	Install guards on all dangerous moving parts of machines and equipment	
									The factory reduced the noise levels.	
									The factory provided fatigue mat or foot rest are to all workers	
8	Working Time									
		○	○	●	●	●	○			
									The factory provided time off for breastfeeding breaks	
		●	●	○	●	●	○			
	Regular Hours									30
		●	●	●	●	●	●	Working time records.	Use a reliable time attendance system.	
									The factory complied with the limits of overtime hours worked.	
									The factory got an authorization from the Department of Labour for overtime.	
									The factory got and authorization from the Department of Labour for work on Sundays.	

Premium Apparel S.A.

Location	Port-au-Prince
No. of workers	1114
Registration date	28 October 2009

Advisory Services and Training

7 September 2012	Social Dialogue meeting
24 September 2012	Management intro meeting.
26 September 2012	Cluster meeting with management on IR issues.
29-31 January	Negotiation Skills Training provided by ITC/ILO.

	Compliance cluster	Compliance point	Assessment						Details of non-compliance	Improvement Priorities	Remediation Efforts	# Months
			1*	2*	3*	4*	5*	6*				
1	Child Labour	Child Labourers	○	○	○	○	○	○				
		Documentation and Protection of Young Workers	○	○	○	○	○	○				
		Hazardous Work	○	○	○	○	○	○				
		Unconditional Worst Forms	○	○	○	○	○	○				
2	Discrimination	Gender	●	○	○	○	○	○				
		Other Grounds	○	○	○	○	○	○				
		Race and Origin	○	○	○	○	○	○				
		Religion and Political Opinion	●	○	○	○	○					
3	Forced Labour	Bonded Labour	○	○	○	○	○	○				
		Coercion	○	○	○	○	○	○				
		Forced Labour and Overtime	○	○	○	○	○	○				
		Prison Labour	○	○	○	○	○	○				
4	Freedom of Association and Collective Bargaining	Collective Bargaining	○	○	○	○	○	○				
		Interference and Discrimination	○	○	○	○	○	○				
		Strikes	○	○	○	○	○	○				
		Union Operations	○	○	○	○	○	○				

5	Compensation	Method of Payment	☐	☐	☐	☐	☐	☐			
		Minimum Wages	☒	☒	☒	☒	☒	☒	Piece rate level.	The factory needs to set the piece rate at a level such as the workers could earn 300 Gourdes within 8 hours of work.	30
		Overtime Wages	☒	☐	☐	☐	☐	☐			
		Paid Leave	☒	☐	☐	☐	☐	☐			
		Premium Pay	☐	☐	☐	☐	☐	☐			
		Social Security and Other Benefits	☒	☒	☐	☒	☒	☐	Forwarding workers' contribution for social insurance funds to ONA.	Regularly forward workers contribution for social insurance funds to ONA.	30
									Employer contribution to ONA.	Regularly forward employer' contribution for social insurance funds to ONA.	
										The factory is now collecting the required social insurance funds from the workers.	
		Wage Information, Use and Deduction	☐	☒	☐	☐	☐	☐			
6	Contracts and Human Resources	Contracting Procedures	☐	☐	☐	☐	☐	☐			
		Discipline and Disputes	☐	☐	☐	☐	☐	☐			
		Employment Contracts	☐	☒	☒	☒	☐	☐		The factory has consulted the workers on the daily break period to comply with their internal work rules.	
		Termination	☒	☐	☒	☐	☐	☐			
7	Occupational Safety and Health	Chemicals and Hazardous Substances	☒	☐	☒	☐	☐	☐			
		Emergency Preparedness	☒	☐	☒	☐	☐	☐		The factory has trained 10% of the workforce on the use of the fire-fighting equipment	
		Health Services and First Aid	☒	☒	☐	☒	☒	☐	Health checks for workers who are exposed to work-related hazards.	Provide medical checks upon hiring. Conduct checks annually for ordinary workers and bi-annually for workers exposed to chemicals	30
									Onsite medical facilities and staff.	Increase onsite medical staff.	
									Pre-assignment and/or annual medical checks for workers.	Provide annual medical checks for workers.	
										The factory has made the first-aid boxes readily accessible.	
										The factory has trained 10% of the workforce in first-aid.	

8	Working Time	OSH Management Systems					
		Welfare Facilities		Washing facilities and/or soap.	Provide soap to workers on a consistent basis.		30
				Providing drinking water.	Provide workers with enough free safe drinking water.		
				Toilets.	Provide the amount of toilets required by the Haitian Labour Code.	The factory repaired the broken toilets but they still need to increase the number.	
						Workers are now allowed to bring their cups.	
		Worker Accommodation					
		Working Environment		Workplace lighting.	Increase the lighting level in the workplace.		30
		Worker Protection		Installing guards on all dangerous moving parts of machines and equipment.	Installed guards on all dangerous moving parts of machines and equipment.		30
		Leave		Time off for breastfeeding breaks.	Provide breastfeeding breaks to all workers entitled to it.		18
		Overtime				The factory has reduced the overtime hours worked.	
						The factory has obtained MAST authorization to work overtime.	
						The factory has obtained MAST authorization to work on Sundays.	
		Regular Hours				The factory has consulted the workers on the daily break period.	

Sewing International S.A.

Location Port-au-Prince
No. of workers 1702
Registration date 25 September 2009

Advisory Services and Training

7 September 2012 Social Dialogue meeting
03-04 October 2012 Social Dialogue Training provided by ILO.
05 October 2012 Management intro meeting with management after the 5th factory report has been submitted in order to discuss assessment findings and work on the action plan.
29-31 January 2013 Negotiation Skills Training provided by ITC/ILO.

Compliance cluster	Compliance point	Assessment						Details of non-compliance	Improvement Priorities	Remediation Efforts	#Months
		1*	2 *	3*	4*	5*	6*				
1	Child Labour	Child Labourers	☐	☐	☐	☐	☐	☐			
		Documentation and Protection of Young Workers	☐	☐	☐	☐	☐	☐			
		Hazardous Work	☐	☐	☐	☐	☐	☐			
		Unconditional Worst Forms	☐	☐	☐	☐	☐	☐			
2	Discrimination	Gender	☐	☐	☐	☐	☐	☐			
		Other Grounds	☐	☐	☐	☐	☐	☐			
		Race and Origin	☐	☐	☐	☐	☐	☐			
		Religion and Political Opinion	☐	☐	☐	☐	☐	☐			
3	Forced Labour	Bonded Labour	☐	☐	☐	☐	☐	☐			
		Coercion	☐	☐	☐	☐	☐	☐			
		Forced Labour and Overtime	☐	☐	☐	☐	☐	☐			
		Prison Labour	☐	☐	☐	☐	☐	☐			
4	Freedom of Association and Collective	Collective Bargaining	☐	☐	☐	☐	☐	☐			

	Bargaining	Interference and Discrimination	●	○	○	○	○	○			
		Strikes	○	○	●	●	●	● ⁵	Punishing workers for participating in a strike.	Don't punish workers for participating in a strike.	18
		Union Operations	○	○	○	○	○	○			
5	Compensation	Method of Payment	○	○	○	○	○	○			
		Minimum Wages	●	○	●	●	●	●	Piece rate level.	Set the piece rate at a level where workers earn at least 300 Gourde/day for a regular hour workday.	18
		Overtime Wages	○	○	○	○	○	○			
		Paid Leave	●	◐	○	○	○	○			
		Premium Pay	○	○	○	○	○	○			
		Social Security and Other Benefits	●	◐	○	●	○	●	Forwarding workers' contribution for social insurance funds to ONA.	Regularly forward workers contribution for social insurance funds to ONA.	
									Employer contribution to ONA.	Regularly forward employer' contribution for social insurance funds to ONA.	
6	Contracts and Human Resources	Wage Information, Use and Deduction	●	●	○	●	○	○			
		Contracting Procedures	○	○	○	○	○	○			
		Discipline and Disputes	○	○	○	○	○	●	Bullying, harassment or humiliating treatment of workers.	Ensure that workers are not bullied, harassed or subjected to humiliating treatment	
		Employment Contracts	●	◐	◐	●	●	○		The factory has revised its internal work rules to comply with the Haitian Labour Law.	
		Termination	○	○	○	●	○	○		Internal work rules comply with the legal requirements.	
										The factory put system in place and warning signed by workers has been found in workers files	

⁵ NB : the factory dismissed approx. 140 workers following an illegal strike that took place in May 2011. No action has been taken so far by the employer to reinstate the terminated workers.

7	Occupational Safety and Health	Chemicals and Hazardous Substances	● ● ◐ ● ◐ ◐	Labelling of chemicals and hazardous substances. Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Label all chemical and hazardous substances used in the workplace. Provide and post MSDS for all chemicals and hazardous substances used in the workplace. The factory has trained workers who work with chemicals and hazardous substances. The factory has provided washing facilities or cleansing materials in the event of chemical exposure. The factory kept inventory of chemicals used in the workplace.	30
		Emergency Preparedness	● ● ◐ ● ◐ ◐	Marking or posting of emergency exits and/or escape routes in the workplace. Accessible, unobstructed, and/or unlocked emergency exits during working hours, including overtime. Periodic emergency drills.	Post emergency exit lights in the right place. Ensure that all exits are unlocked and accessible during working hours, including overtime. The factory has trained 10% of the workforce on the use of the fire-fighting equipment Emergency drill was conducted in April 2011 and May 2012	30
		Health Services and First Aid	● ● ● ● ● ●	Health checks for workers who are exposed to work-related hazards. Onsite medical facilities and staff. First-aid boxes/supplies in the workplace. Pre-assignment and/or annual medical checks for workers.	Provide health check to workers who are exposed to work-related hazards. Increase onsite medical staff. Ensure that all first aid boxes are readily accessible. Ensure that medical checks are provided to workers on pre-assignment and annually.	30
		OSH Management Systems	● ◐ ○ ● ○ ○		The factory sent record of work related accidents to OFATMA	
		Welfare Facilities	● ● ● ◐ ● ◐	Toilets.	Provide the amount of toilets required by the Haitian Labour Code. The factory has provided an adequate eating area	30
		Worker Accommodation	○ ○ ○ ○ ○ ○			
		Working Environment	○ ○ ○ ● ○ ○			

8	Working Time	Worker Protection	●	◐	◐	●	◐	◐	Installing guards on all dangerous moving parts of machines and equipment.	Ensure that guards are installed on all the dangerous moving parts of machines and equipment	The factory has trained workers to use machines and equipment safely.	30
											The factory maintained all electrical wires.	
		Leave	○	○	●	●	●	○			The factory established and implements a breastfeeding break policy.	
		Overtime	●	●	●	●	●	●	Limits on overtime hours worked.	Comply with the limits on overtime hours worked.		30
	Regular Hours								Authorization from the Department of Labour for overtime.	Obtain authorization from the Department of Labour to work overtime.		
									Authorization from the Department of Labour for work on Sundays.	Obtain authorization from the Department of Labour to work on Sundays.		
											The factory has reduced the regular working hours to comply with legal requirements	
											The factory has installed and is using a reliable time attendance system	
											The factory has consulted the workers on the daily break period	

The Willbes Haitian II S.A.

Location Port-au-Prince
No. of workers 885
Registration date 27 August 2010

Advisory Services and Training

11 & 12 September 2012 Workplace Communication 1&2 for 31 workers and 18 supervisors.
21 September 2012 Management intro Meeting management after the 5th factory report has been submitted in order to discuss assessment findings and work on the action plan.
03-04 October 2012 Social Dialogue Training provided by ILO.
19 October 2012 Advisory visit to measure the remediation efforts accomplished.
15 November 2012 Follow-up advisory visit on remediation efforts.
13 December 2012 Social Dialogue meeting
24 January 2013 Social Dialogue meeting

Compliance cluster		Compliance point		Assessments					Details of non-compliance		Improvement Priorities		Remediation Efforts		# Months
				1*	2*	3*	4*	5*							
1	Child Labour	Child Labourers		☐	☐	☐	☐	☐							
		Documentation and Protection of Young Workers		☐	☐	☐	☐	☐							
		Hazardous Work		☐	☐	☐	☐	☐							
		Unconditional Worst Forms		☐	☐	☐	☐	☐							
2	Discrimination	Gender		☐	☐	☐	☐	☐							
		Other Grounds		☐	☐	☐	☐	☐							
		Race and Origin		☐	☐	☐	☐	☐							
		Religion and Political Opinion		☐	☐	☐	☐	☐							
3	Forced Labour	Bonded Labour		☐	☐	☐	☐	☐							
		Coercion		☒	☐	☐	☐	☐							
		Forced Labour and Overtime		☐	☐	☐	☐	☐							
		Prison Labour		☐	☐	☐	☐	☐							
4	Freedom of Association and Collective Bargaining	Collective Bargaining		☐	☐	☐	☐	☐							
		Interference and Discrimination		☐	☐	☐	☐	☐							
		Strikes		☐	☐	☐	☐	☐							

5	Compensation	Union Operations	☐	☐	☐	☐	☐			
		Method of Payment	☐	☐	☐	☐	☐			
		Minimum Wages	☐	☐	☐	☒	☒	Piece rate level.	Set piece rate at a level such that workers earn at least 300 Gourdes per day for ordinary hours of work.	6
		Overtime Wages	☐	☐	☐	☐	☐			
		Paid Leave	☒	☐	☐	☐	☐			
		Premium Pay	☐	☐	☐	☐	☐			
		Social Security and Other Benefits	☒	☐	☒	☐	☐			
		Wage Information, Use and Deduction	☐	☐	☐	☐	☐			
6	Contracts and Human Resources	Contracting Procedures	☐	☐	☐	☐	☐			
		Discipline and Disputes	☐	☐	☐	☒	☐		Management had a meeting with the General supervisor in Building 41 to discuss the application of the policy on verbal abuse.	
		Employment Contracts	☒	☒	☒	☐	☐			
		Termination	☒	☒	☐	☐	☐		A new form has been prepared and is being used for terminated/ resigned workers. It provides reason for termination and is added to the employee's file. HR staff had a workshop with the factory advisor that included discussions on the proper termination process.	
7	Occupational Safety and Health	Chemicals and Hazardous Substances	☒	☐	☒	☐	☒	Labelling of chemicals and hazardous substances. Storage of chemicals and hazardous substances. Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Label all chemicals and hazardous substances used in the workplace. Store all chemicals and hazardous substances correctly. Post chemical safety data sheets for all chemicals and hazardous substances in the workplace.	24
		Emergency Preparedness	☒	☐	☒	☐	☐	Fire fighting equipment.	Maintain fire fighting equipment.	24
									10 per cent of workers received fire fighting training. Appropriate records are kept on file.	

8	Working Time	Health Services and First Aid	●	●	◐	◐	◐	Onsite medical facilities and staff.	Hire additional medical staff according to the Haitian labour code.	24
								First aid boxes/supplies in the workplace.	Ensure that the first aid boxes/supplies in the work-place are readily accessible.	
								Pre-assignment and/or annual medical checks for workers.	Provide pre-assignment and/or annual medical checks for workers.	OFATMA had started to carry out medical checks on the workers in the factory and 135 workers had already been checked. 10 per cent of workers received first aid training. Appropriate records are kept on file. The factory provided all pregnant women with chairs with backrest.
		OSH Management Systems	●	◐	●	○	○			
		Welfare Facilities	●	●	●	●	●	Toilets.	Increase the number of toilets and maintain the actual ones	24
								Eating area.	Provide an appropriate eating area.	
		Worker Accommodation	○	○	○	○	○			
		Working Environment	○	○	●	●	○			The factory has acceptable temperature levels in the workplace. The factory has acceptable noise levels in the work-place. The factory has acceptable light levels in sewing, quality and packing area.
		Worker Protection	●	◐	●	◐	◐	Training and encouragement of workers to use the personal protective equipment provided.	Train and encourage workers to use the personal protective equipment provided.	24
								Chairs with backrests.	Provide chairs with backrests to all workers.	The factory ordered chairs with backrest for all workers. The chairs were being assembled at the time of the assessment visit.
8	Working Time							Training of workers to use machines and equipment safely.	Train workers to use machines and equipment safely.	
								Installing guards on all dangerous moving parts of machines and equipment.	Install guards on all dangerous moving parts of machines and equipment.	The factory ordered protective devices for sewing machines and the installation is in progress.
		Leave	○	○	●	○	●	Time off for breastfeeding breaks.	Provide time off for breastfeeding breaks to all eligible workers.	
		Overtime	●	○	○	○	○			
		Regular Hours	●	◐	●	○	○			

The Willbes Haitian III S.A.

Location Port-au-Prince
No. of workers 524
Registration date 27 August 2010

Advisory Services and Training

21 September 2012 Management Intro Meeting.
03-04 October 2012 Social Dialogue Training provided by ILO.
19 October 2012 Advisory visit to measure the remediation efforts accomplished.
15 November 2012 Follow-up advisory visit on remediation efforts.
13 December 2012 Social Dialogue meeting
24 January 2013 Social Dialogue meeting

Compliance cluster		Compliance point	Assessment					Details of non-compliance	Improvement Priorities	Remediation Efforts	# months
			1*	2*	3*	4*	5*				
1	Child Labour	Child Labourers	☐	☐	☐	☐	☐				
		Documentation and Protection of Young Workers	☐	☐	☐	☐	☐				
		Hazardous Work	☐	☐	☐	☐	☐				
		Unconditional Worst Forms	☐	☐	☐	☐	☐				
2	Discrimination	Gender	☐	☐	☒	☐	☐				
		Other Grounds	☐	☐	☐	☐	☐				
		Race and Origin	☐	☐	☐	☐	☐				
		Religion and Political Opinion	☐	☐	☐	☐	☐				
3	Forced Labour	Bonded Labour	☐	☐	☐	☐	☐				
		Coercion	☐	☐	☐	☐	☐				
		Forced Labour and Overtime	☐	☐	☒	☐	☐				
		Prison Labour	☐	☐	☐	☐	☐				
4	Freedom of Association and Collective Bargaining	Collective Bargaining	☐	☐	☐	☐	☐				
		Interference and Discrimination	☐	☐	☐	☐	☐				
		Strikes	☐	☐	☐	☐	☐				
		Union Operations	☐	☐	☐	☐	☐				

5	Compensation	Method of Payment	☐	☐	☐	☐	☐			
		Minimum Wages	☒	☒	☒	☒	☒	Piece rate level.	Set piece rate at a level such that workers earn at least 300 Gourdes per day for ordinary hours of work.	24
		Overtime Wages	☐	☐	☐	☐	☐			
		Paid Leave	☐	☐	☐	☐	☐			
		Premium Pay	☐	☐	☐	☐	☐			
		Social Security and Other Benefits	☒	☐	☒	☐	☐			
		Wage Information, Use and Deduction	☐	☐	☐	☐	☐			
6	Contracts and Human Resources	Contracting Procedures	☐	☐	☐	☐	☐			
		Discipline and Disputes	☐	☐	☐	☐	☐			
		Employment Contracts	☒	☐	☒	☐	☐			
		Termination	☒	☐	☒	☐	☐			
7	Occupational Safety and Health	Chemicals and Hazardous Substances	☒	☐	☒	☐	☐	Chemical safety data sheets for all chemicals and hazardous substances in the workplace. Washing facilities or cleansing materials in the event of chemical exposure.	Display chemical safety data sheets for all chemicals and hazardous substances in the workplace. The eye wash bottle in the spot cleaning area was replaced by a functional one. The factory also purchased additional sterile solution bottles in case replacement is needed.	24
		Emergency Preparedness	☒	☐	☒	☐	☐		10 per cent of workers received training in the use of the fire fighting equipment. Appropriate records are kept on file.	
		Health Services and First Aid	☒	☐	☒	☐	☐	Onsite medical facilities and staff. Pre-assignment and/or annual medical checks for workers.	Hire additional medical staff according to the Haitian labour code. Provide pre-assignment and/or annual medical checks for all workers.	24
		OSH Management Systems	☒	☐	☒	☐	☐			
		Welfare Facilities	☒	☒	☐	☐	☒	Toilets.	Increase the number of toilets and maintain the actual ones.	24
		Worker Accommodation	☐	☐	☐	☐	☐			
		Working Environment	☐	☐	☐	☒	☐		The factory has acceptable temperature levels in sewing, quality and packing area.	

8	Working Time	Worker Protection	☒	☐	☒	☐	☐	Accommodating standing workers.	Accommodate standing workers.	24
								Installing guards on all dangerous moving parts of machines and equipment.	Install guards on all dangerous moving parts of machines and equipment.	The factory ordered about 80% of the missing eye guards for sewing machines and the mechanic supervisor started with their installation.
		Leave	☐	☐	☒	☒	☐			The factory installed chairs with backrest for all workers
		Overtime	☒	☐	☒	☒	☐			A new poster was displayed in the factory in order to explain the company's breastfeeding policy. The last assessment visit showed that the policy is now implemented.
		Regular Hours	☒	☐	☒	☐	☐			A new poster was displayed in the factory in order to explain the company's overtime policy. Time system machine is kept on all day long.

Annex 1. HOPE II Legislation Reporting Requirements

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

[...] (D) BIENNIAL REPORT. —The biennial 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 biennial 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. Process for handling complaints to the Labour Ombudsperson

