## **Compliance Assessment Report**



IRIS Fabrics Limited
09/02/2025 (dd/mm/yyyy)

Assessment Start date: 14/01/2025 (dd/mm/yyyy)
Assessment End date: 15/01/2025 (dd/mm/yyyy)

Cycle: 10

Modality: ONSITE Report ID: 2746

Country: Bangladesh

Product type: Sewing or Final Product Assembly

Supplier Name: IRIS Fabrics Limited

Supplier Address: Zirani Bazar, Kashimpur, Gazipur

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

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# **Better Work Clusters and Compliance Points**

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

# **Factory Visit Information**

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

### **Key Strengths and Process Integrity**

Question	Answer
Was any part of the assessment conducted virtually?	No
What is the total number of employee interviews conducted?	41
Provide details about number of employees interviewed	Total number of workers interviewed: Total 41, male- 18, female- 23.
	Individual interviews: total 23, male- 11, female- 12.
	Group interviews (Fire Fighter, Safety Committee and Trade Union): 18 workers, male- 07, female- 11.
	Workers were selected by assessors from the Cutting, Sewing, Finishing, Dyeing, Knitting, Printing, Security, and Maintenance sections for interview.
	Interview locations: Production floors, canteen, and meeting room.
	Interview process: Interviews were conducted without the presence of management and using open-ended questions.
	Selection process: Randomly selected by the assessors based on the factory tour, payroll, time records, and personnel files covering most of the sections.
Did the Enterprise Advisor(s) conduct an offsite documentation review?	No
1. Cooperativeness of facility	Enterprise was cooperative.
2. Strengths of management practices	Nothing Significant.
3. Any other comments	None

#### **Child Labour**

Question	Answer
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How many workers under the age of 18 have worked at the facility during the assessment timeframe?	0
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#### Discrimination

Question	Answer
How many workers became disabled (for whatever reason)?	40

#### Freedom of Association and Collective Bargaining

Question	Answer
Does the facility have: i) an established union on-site, and/or ii) workers affiliated to higher-level unions (such as sectoral unions)?	Yes

Based on information gathered from the publicly accessible Department of Labor (DOL) website and also confirmed by management and worker interviews that there is a union in the factory named IRIS Fabrics Ltd. Sromic Union with Registration Number Dhaka- 5816, which received registration on 23 May 2022. EAs observed that factory management was not opposed to workers exercising their Freedom of Association (FoA) rights. Interviews with workers indicated that workers were aware of the union membership process and other union activities. Moreover, policies on FoA were communicated to the workers through the notice board and the union is a member of National Garments Sromic Federation.

NUMBER of established trade unions in the facility: (Ref 7626)	1

Based on information gathered from the publicly accessible Department of Labor (DOL) website and also confirmed by management and worker interviews that there is a union in the factory named IRIS Fabrics Ltd. Sromic Union with Registration Number Dhaka- 5816, which received registration on 23 May 2022.

## PERCENTAGE of workers that are trade union members: (Ref 7628)

Management and The Union Executive Committee members confirm that 20% of the total workforce are the member of the union.

Name of union with the largest membership: (Ref 18369)	IRIS Fabrics Ltd. Sromic Union
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IRIS Fabrics Ltd. Sromic Union with Registration Number Dhaka- 5816, which received registration on 23 May 2022. Enterprise Management and Union representatives are confirmed that 600 workers are belongs to the said union.

Name of the federation or confederation (or both) with which the largest union at the facility is affiliated, if applicable (please indicate whether it is a federation or a confederation in your response): (Ref 18369)	National Garments Sromic Federation
TOTAL number of union members in the union with the largest membership in the facility (Ref 18369)	600

Management and Union representatives are confirmed that 600 workers are belongs to the said union.

NUMBER of female union members in the union with the largest membership in the facility (Ref 18369)	350
TOTAL number of union officials in the union with the largest membership in the facility	11
Based on the information obtain from document review, management and worker interview a executive commit with 11 members was formed on 21 June 2024 with validity of 2 years.	
NUMBER of female union officials in the union with the largest membership in the facility	6
How many Collective Bargaining Agreements (CBAs) have there been in effect at the facility during the assessment timeframe? (Ref 8979)	1
There was only one collective bargaining agreement was signed on 05 October 2024 with 21 demand regarding working conditions and terms of employment .	
Parties to the CBA that covers the greatest number of workers in the workplace: (Ref 18460)	1. IRIS Fabric Ltd. Management, 2. IRIS Fabric Ltd. Sromik Union and 3. National Garments Worker Federation.
PERCENTAGE of workforce covered by the CBA that covers the greatest number of workers in the workplace: (Ref 18460)	100
Duration of the CBA that covers the greatest number of workers in the workplace (provide NUMBER value for duration in months): (Ref 18460)	12
Overview of the issues covered in the CBA that covers the greatest number of workers in the workplace: (Ref 18460)	There were 21 issue as below:  1. Attendance Bonus, 2. Wage Increase, 3. Tiffin Bill, 4. Night Bill, 5. Excess Working Hour, 6. Mobile Phone Facility, 7. Changing of old fan at floor, 8. Hot water at dining, 9. Increase number of attendance count machine, 10. Provident fund, 11. Attain all type of government holiday, 12. Welfare officer, 13. On time wages, 14. Attendance bonus, 15. Production Bonus, 16. Maternity leave, 17. Women supervisor, 18. Needle management, 19. Sharp tools management, 20. Skill development of workers and 21. Grievance management.
How many industrial actions/strikes have occurred? (Ref 7647)	0

#### **Contracts and Human Resources**

Question	Answer
Total number of workers: (Ref 18130)	2480

Number of male workers: (Ref 18131)	1458
Number of full-time workers:	2480
Number of male full-time workers:	1458
Number of permanent workers: (Ref 9046)	2239
Number of male permanent workers: (Ref 9048)	1353
Number of temporary workers: (Ref 9059, 9070)	0
Number of agency/contract workers:	0
Number of contract workers/ workers employed by third party who are not part of the production process:	0
Number of foreign migrant workers: (Ref 11540)	0
Number of domestic migrant workers:	2480
Number of male domestic migrant workers:	1458
Number of workers paid by unit:	0
Number of workers under probation: (Ref 9049)	241
Number of male workers under probation: (Ref 9051)	105
Number of casual workers: (Ref 9063)	0
Number of workers who are trainees, apprentices or interns: (Ref 9054)	0
Number of workers who are pregnant/breastfeeding:	40
Number of workers with disclosed disabilities: (Ref 18154)	40
Number of male workers with disclosed disabilities: (Ref 18279)	29
Number of workers who bring production work home or work on production at home exclusively:	0
Number of supervisors: (Ref 13355)	378
Number of foreign migrant supervisors: (Ref 7640)	0
Number of male supervisors: (Ref 11538)	297
Operating License/Registration #:	82/Gazipur (Trade License) 14239/ Gazipur (Factory License)
Are subcontractors utilized by the facility to complete all or part of the production process? (Ref 7650)	Yes

If yes, how many subcontractors?	10
Does the facility offer/ participate in any apprenticeship / trainee / internship programs? (Ref 9054)	No
Does the facility use fixed-term contracts?	No
How many members are in the bipartite committee?	0
How many female members are in the bipartite committee?	0
How many employer members are in the bipartite committee?	0
How many worker members are in the bipartite committee?	0

## Occupational Safety and Health

Question	Answer
Total number of buildings on-site:	10 or more
Number of production buildings on-site:	1
Number of warehouses on-site:	1
Are warehouses within or separate from production buildings?	Warehouses are separate buildings
Number of on-site dormitories:	0
Is there an on-site canteen/eating area? (Ref 18252)	Yes. Onsite canteen and eating area.
Are there on-site childcare facilities?	Yes
Describe any other types of buildings:	Utility Building (Boiler, Generator, ETP), Fire Control Room, Admin Building, Security Room etc.
Total Facility Area (m2) - only built premises:	38644
Facility is in a multi-floor building:	Yes
Number of all floors:	9
Floors have been added since original construction:	No
Building is shared with other facilities/enterprises:	Yes
Residential building has been converted into a facility:	No
Residences are located within any facility buildings:	No
Does the facility use laser or radiation producing equipment?	No

Does the facility perform any type of "hot work" (i.e. welding, soldering etc.)?	No
Number of work-related fatalities and injuries that resulted in at least three days of absence from work: (Ref 11606)	0
Number of work-related injuries that resulted in less than three days of absence from work: (Ref 11606)	7
Number of work-related dangerous occurrences in the last 12 months (e.g. collapse, partial collapse, explosions, electrical fire, etc.):	0
Number of commuting injuries (incl. fatalities) in the last 12 months: (Ref 11606)	0
Number of work-related diseases in the last 12 months: (Ref 11606)	0

## **Working Time**

Question	Answer
Normal Hours of Operation per day:	8
Number of Shifts and Hours of Operation for each (Normal Operations):	04 Shift (General Shift-08:00am to 05:00pm) Additional three Shifts (06:00am- 02:30pm, 02:00pm-10:30pm, 10:00pm-06:30am)
Number of Shifts and Hours of Operation for each (Peak Operations):	04 Shift (General Shift-08:00am to 05:00pm) Additional three Shifts (06:00am- 02:30pm, 02:00pm-10:30pm, 10:00pm-06:30am)
Peak Operation Months:	Round the year same.

# Management systems

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

#### **Human Resources Management**

hrm-1	Does the employer have a written HR policy?	es
hrm-1-1	Is the HR policy signed by top management?	es
hrm-1-2	Does the HR policy include the following? (SELECT all that apply with an "X")	
hrm-1-2-1	Applicability to all production and non-production workers, regardless of contractual status, including on-site subcontracted workers	×
hrm-1-2-2	Mandatory minimum age requirements	×
hrm-1-2-3	Appropriate work for young workers (if relevant)	×
hrm-1-2-4	Equal treatment and non-discrimination	×
hrm-1-2-5	Preventing violence and harassment, including gender-based violence and harassment	×
hrm-1-2-6	Prohibition on forced labour	×
hrm-1-2-7	Legal requirements in relation to termination	×
hrm-1-2-8	Freedom of association	×
hrm-1-2-9	Working hours	×
hrm-1-2-10	Compensation	×
hrm-1-2-11	None of the above	
hrm-2	Does the employer have written recruitment procedures?	es
hrm-2-1	Does the recruitment procedure describe the following? (SELECT all that apply with an "X")	
hrm-2-1-1	Hiring criteria that are applied equally to all job applicants	×
hrm-2-1-2	Methods for verifying the age of workers prior to hiring	×

hrm-2-1-3	Methods for ensuring compliance with legal requirements for workers under age 18 (if relevant)	×
hrm-2-1-4	Methods for ensuring that workers retain all of their original ID documents	×
hrm-2-1-5	None of the above	
hrm-3	Does the employer have written disciplinary procedures?	Yes
hrm-3-1	Do the disciplinary procedures include the following? (SELECT all that apply with an "X")	
hrm-3-1-1	Clear specification of unacceptable behaviours or performance, such as violence and harassment, including gender-based violence and harassment	×
hrm-3-1-2	A step-by-step warning system	×
hrm-3-1-3	Right to representation during disciplinary processes	×
hrm-3-1-4	Time frames for warnings and payment	×
hrm-3-1-5	None of the above	
hrm-4	Does the employer have written termination procedures?	Yes
hrm-4-1	Do the termination procedures include the following? (SELECT all that apply with an "X")	
hrm-4-1-1	Opportunity for workers to defend themselves prior to termination	×
hrm-4-1-2	Legal notice periods	×
hrm-4-1-3	Termination payments	×
hrm-4-1-4	Provisions at least as favourable to workers as the law requires	×
hrm-4-1-5	None of the above	
hrm-5	Does the employer have written grievance handling procedures?	Yes
hrm-5-1	Do the grievance handling procedures ensure the following? (SELECT all that apply with an "X")	
hrm-5-1-1	Clear options for submitting grievances	×
hrm-5-1-2	Anonymity	×
hrm-5-1-3	Confidentiality as appropriate	×

hrm-5-1-4	Non-retaliation	×
hrm-5-1-5	Fair review and appeal process	×
hrm-5-1-6	Communication of changes made and/or resolution of grievance as appropriate	×
hrm-5-1-7	None of the above	
hrm-6	Does the employer have written dispute resolution procedures?	Yes
hrm-6-1	Do the dispute resolution procedures ensure the following? (SELECT all that apply with an "X	")
hrm-6-1-1	Clear options for submitting disputes	×
hrm-6-1-2	Anonymity	×
hrm-6-1-3	Confidentiality as appropriate	×
hrm-6-1-4	Non-retaliation	×
hrm-6-1-5	Fair review and appeal process	×
hrm-6-1-6	Communication of changes made and/or resolution of dispute as appropriate	×
hrm-6-1-7	None of the above	
hrm-7	Has the employer assigned responsibility in writing to HR staff for following factory HR policies and procedures?	Yes
hrm-8	Has the employer assigned accountability in writing to management for following factory policies and procedures relating to employment practices (i.e. contracts etc.)?	Yes
hrm-9	How does the employer communicate and implement HR policies and procedures? (SELECT all that apply with an "X")	
hrm-9-1	Recruitment postings accurately reflect HR policies and procedures, e.g., on wages and working hours	×
hrm-9-2	The employer provides workers with signed copies of their contracts that reflect HR policies and procedures	×
hrm-9-3	The employer provides induction training for workers and staff on HR policies and procedure	s ×
hrm-9-4	The employer informs trade union and other worker representatives and/or worker-management committees about HR policies and procedures	×
hrm-9-5	HR policies and internal regulations are posted / easily accessible in facility	×

hrm-9-6	The employer trains staff on how to carry out HR policies and procedures		×
hrm-9-7	None of the above		
hrm-10	Does the employer investigate performance under HR policies and procedures to identify weaknesses and make necessary adjustments?	No	

### **OSH Management**

oshm-1	Does the employer have a written OSH policy?	Yes	3
oshm-1-1	Does the OSH policy include a clear commitment to the following? (SELECT all that apply an "X")	with	
oshm-1-1-1	continued improvement aimed at elimination of work-related injury and illness		
oshm-1-1-2	compliance with legal requirements pertaining to OSH		×
oshm-1-1-3	establishing measurable objectives and improvement targets		
oshm-1-1-4	None of the above		
oshm-1-2	Is the OSH policy signed by top management?	Yes	3
oshm-1-3	Was the OSH policy developed in consultation with workers' representatives?	No	
oshm-2	Does the employer have written emergency preparedness procedures?	Yes	5
oshm-2-1	Do the emergency preparedness procedures describe methods for the following? (SELECT that apply with an "X")	CT all	
oshm-2-1-1	reporting fires and other emergencies		×
oshm-2-1-2	alerting all workers to evacuate		×
oshm-2-1-3	evacuating workers to designated assembly location		×
oshm-2-1-4	accounting for all workers after an evacuation		×
oshm-2-1-5	None of the above		

oshm-3-1	Does the factory's hazard/risk management and control procedure describe methods for the following? (SELECT all that apply with an "X")	
oshm-3-1-1	a systematic approach to identifying hazards	×
oshm-3-1-2	prioritising risks based on potential impact and likelihood (e.g., risk matrix)	×
oshm-3-1-3	a hierarchy of controls that is used to select effective controls	
oshm-3-1-4	a risk register that drives the implementation of controls (list of risks, steps that must be taken to address the of risks, dates and owners, etc.)	
oshm-3-1-5	None of the above	
oshm-4	Does the employer have written accident investigation procedures?	es
oshm-4-1	Does the factory's accident investigation procedure include the following? (SELECT all that apply with an "X")	
oshm-4-1-1	root cause analysis	×
oshm-4-1-2	a focus on sustainable solutions	×
oshm-4-1-3	a requirement for change in order to avoid re-occurrence	×
oshm-4-1-4	None of the above	
oshm-5	Has the employer defined accountability and/or responsibility for OSH issues in writing for OSH officer as well as top management he/she reports to?	es
oshm-6	Does the factory have an OSH officer with sufficient time, expertise and authority to perform responsibilities?	es
oshm-7	Is there an OSH committee or similar worker/management committee with a mandate to consider OSH issues in the workplace?	es
oshm-8	How does the employer communicate and implement OSH policies and procedures? (SELECT all that apply with an "X")	
oshm-8-1	the employer trains workers on OSH policies and procedures relevant to assigned tasks, including during induction	×
oshm-8-2	the employer trains OSH committee members on OSH policies and procedures	
oshm-8-3	the employer posts the names of the OSH committee members in the workplace	×
oshm-8-4	OSH policies and work instructions are posted and easily accessible in the factory	×

oshm-8-5	the employer informs visitors/ contractors/ service providers about OSH policies and procedures	
oshm-8-6	the employer posts evacuation plans in the workplace	×
oshm-8-7	None of the above	
oshm-9	Does the employer do any of the following to investigate, monitor and measure OSH issues to identify root causes and make necessary adjustments to prevent recurrence? (SELECT all that apply with an "X")	
oshm-9-1	investigate, monitor and measure OSH issues	
oshm-9-2	conduct regular OSH tests, surveys and inspections (e.g. testing quality of drinking water or air testing in footwear factories)	×
oshm-9-3	log violations of OSH procedures	
oshm-9-4	analyse violations of OSH procedures	
oshm-9-5	regularly review the effectiveness of OSH management systems, including performance on measurable objectives and targets	
oshm-9-6	change procedures/ practices where required based on accident investigations	
oshm-9-7	None of the above	

# **Overview of Non-Compliance**

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

### **Working Conditions**

#### Compensation

Wage Information, Use and Deduction

Payroll records (Ref 12385)

#### **Contracts and Human Resources**

Dialogue, Discipline and Disputes

Welfare Officer (Ref 18456)

#### Occupational Safety and Health

**Chemicals and Hazardous Substances** 

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

**Emergency Preparedness** 

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

Health Services and First Aid

Onsite medical facilities and staff (Ref 12458)

Information and education on HIV/AIDS (Ref 9162)

**OSH Management Systems** 

Safety Committee (Ref 18242)

#### **Worker Protection**

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

Installing guards on all dangerous machines and equipment (Ref 12413)

Ergonomic requirements (Ref 11542)

#### **Working Environment**

Workplace noise levels (Ref 18250)

**Environmental Clearance Certificate** 

#### **Working Time**

Leave

Time off for festival holidays (Ref 18287)

#### Overtime

Limits on weekly overtime hours worked (Ref 18280)

Limits on daily overtime hours worked (Ref 18280)

# **Detailed Non-Compliance Findings**

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

### **Working Conditions**

#### Compensation

Wage Information, Use and Deduction

Issue	Payroll records (Ref 12385)
Question	Does the facility maintain only one accurate payroll record?
Finding	Document review, management, and worker interviews indicated that the enterprise maintained more than one set of payrolls. 02 separate sets of records were identified, which indicate:
	- One set reflected monthly payment including overtime payment (regular wage sheet).
	- Another set reflected allowance for night work (more than 13 hours in a day).
	Documents checked: Payrolls for January, April and December 2024.
Legal Reference	Rule 111(1), Form 38, BLR

#### **Contracts and Human Resources**

Dialogue, Discipline and Disputes

Issue	Welfare Officer (Ref 18456)
Question	Bangladesh: Does the facility have legally required qualified welfare officer/s?
Finding	Document review and Interviews with management indicated the employer had two welfare officers. However, one out of two welfare officers did not receive training on labour law and industrial relations.
	With regard to the job responsibilities, interview with 1 out of 2 welfare officers indicated that the welfare officers did not:
	- Advise the employer about the implementation of the Labour Act.
	- Advise the employer regarding training and education for workers.
Legal Reference	Section 89(8), BLA; Rules 79, 185 BLR

#### Occupational Safety and Health

**Chemicals and Hazardous Substances** 

Issue	Storage of chemicals and hazardous substances [subject to public reporting] (Ref 12410)
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Question	Are chemicals and hazardous substances stored in line with legal requirements?
Finding	During floor tour, the assessors observed that secondary containments were not provided for the following chemicals:
	- Zingen A F C (use as anti foam agent at ETP) which was stored in the sub-chemical store beside ETP.
	- Acetone (used as spot removing agent) which was found at spot removing room 3rd floor of building number 01.
	- Moreover Thinner, Compressor Lubricant, Coolent Premix, Hydraulic Oil stored together without secondary containment on 3rd floor maintenance store of building 03.
Legal Reference	Guidelines for Assessment of Fire and Electrical Safety of Existing RMG Factory Buildings in Bangladesh, Section 2.8.1; Rule 21, Acid Rules (2004)

## **Emergency Preparedness**

Issue	Accessible, unobstructed, and/or unlocked emergency exits and escape routes during working hours, including overtime [subject to public reporting] (Ref 9174)
Question	Are all emergency exits accessible, unobstructed and unlocked during working hours (including overtime) and lead to a place of safety?
Finding	During floor tour, the assessors observed the following:
	- At least 01 aisle in the sewing section on the 3rd floor of building 01 was partially blocked by in- process goods and sitting arrangement of a tape joining machine operator in the aisles.
	- At least 03 aisles on the 5th floor of building 04 were partially blocked by cut panels and goods.
	- At least 02 aisles were partially blocked by fabrics in the dyeing section Building 04.
	- At least 02 exit ways on 3rd and 4th floor of building 03 were partially blocked by cartons.
	- cartons were kept in staircase at building 03.
Legal Reference	Sections 62(3, 6), 72, BLA; Rules 54, 59, BLR; Guidelines for Assessment of Fire and Electrical Safety of Existing RMG Factory Buildings in Bangladesh, Sections 2.9.2, 2.9.5

### **Health Services and First Aid**

Issue	Onsite medical facilities and staff (Ref 12458)
Question	Are arrangements in case of medical emergency, including on-site medical facilities/clinic(s) and staff in line with legal requirements?
Finding	Document review, interviews with the management and workers indicated that the enterprise had a medical center jointly use with sister concern IRIS Knitwear Ltd. for a total workforce of 4575 (2960+1615). Assessors observed that the medical center did not meet the following requirements:  - No medical staff available at C-shift (10.00pm to 6.30 am) workers where at least 300 workers work.

Legal Reference	Section 89, BLA; Rules 77, 78, BLR
logue	Information and education on HIV/AIDS (Ref 9162)
Issue	, , , , ,
Question	Does the facility comply with occupational safety and health-related legal requirements on HIV/AIDS?
Finding	Training records and management interviews indicated that the enterprise had trained approximately 50% of workers on HIV/AIDS related awareness. However, approximately 60% of the interviewed workers were unaware of information about HIV/AIDS-related risk reduction in their personal lives.
Legal Reference	National Policy on HIV/AIDS and STD Related Issues, Section 11

## **OSH Management Systems**

Issue	Safety Committee (Ref 18242)
Question	Is the OSH Committee formed and functioning in line with legal requirements?
Finding	Floor tour, document review, management and workers interviews indicated that the enterprise formed a safety committee on 14 November 2024.
	The number of total members: 10, Management: 05 (Female- 00, Male- 05), Workers: 05 (Female- 02, Male- 03).
	However, the safety committee did not meet the following requirements:
	a) Roles and Responsibility: Interview with the workers' representatives of the safety committee indicated that 20% of the interviewed members of the Safety Committee were unaware of their roles and responsibilities. Additionally, the safety committee did not:
	- Organise OSH trainings for workers.
	- Not involved in the general OSH assessment.
	However, the safety committee met the following legal requirements:
	a) Nomination: Workers' representatives of the safety committee were nominated by the worker's representatives of the Collective Bargaining Agent (CBA).
	b) Meeting: Meetings were held every 3 months. Meeting minutes were preserved after the meeting and posted on the notice board. Meeting agendas were usually set by both workers and management representatives. The last meeting was held on 11 December 2024.
	c) Communication: Interviewed workers indicated that they were aware about the activities of the safety committee.
	d) Training: An interview with the enterprise management indicated that the employer arranged training for the safety committee members and provided time off during working hours to perform their general functions.
Legal Reference	ILO Convention 155 and Recommendation 164; Section 90(a), BLA; Rules 81-85, Schedule IV, BLR

#### **Worker Protection**

Issue	Providing workers with personal protective clothing and equipment (Ref 9153)
Question	Does the facility provide workers with Personal Protective Equipment (PPE) in line with legal requirements?
Finding	Documents review, worker and management interviews indicated that the enterprise did not provide necessary personal protective equipment (PPE) to all workers. For example:
	- Appropriate dust mask was not provided to over-lock machine operators in the sewing section, operators in the knitting section, and workers in the cutting section. The mentioned workers were provided with fabric masks, which were inadequate to protect against dust.
	- Appropriate chemical rated masks and gloves were not provided to the operators in the printing section who handle hazardous substance and chemicals such as Emulsifier, Printing thickener, Titanium Dioxide. They were only provided with fabric masks which are inadequate to prevent noxious fumes.
	However, the enterprise provided the following personal protective equipment (PPE) to the workers
	- Metal gloves to workers in the cutting section.
	- Chemical masks, rubber gloves and goggles to workers in the spot cleaning section.
	- Chemical masks, waterproof aprons and boots to the workers in the colour room, chemical warehouse, and sub-chemical stores.
	- Chemical masks, waterproof aprons, and boots to the workers in the dyeing section.
	- Ear plugs to the workers in the knitting section and dust sucker operator. Ear muffs for generator and boiler operators.
Legal Reference	ILO Recommendation 97; Section 78(a) BLA; Rules 46, 67, BLR
Issue	Installing guards on all dangerous machines and equipment (Ref 12413)
Question	Are legally required guards properly installed and maintained on all machinery and equipment?
Finding	During the floor tour, the assessors observed that below safety measures were not adequately taken:
	- Approximately 60% of the needle guards of the single needle sewing machines were fixed at an inappropriate height, which cannot protect workers from needle pricks.
	- Approximately 40% of the eye guards in overlock machines were not functional (either scratched or misplaced).
Legal Reference	Sections 63, 67, 70(3), BLA; Rules 61, 62 (1-d), 64, BLR
Issue	Ergonomic requirements (Ref 11542)
Question	Are ergonomic measures in line with legal requirements?
Finding	Floor tour, management, and workers' interviews indicated that the enterprise did not comply with ergonomic requirements, as follows:
	- Standing workers in the Sewing section, printing section, cutting section, finishing section and dyeing section did not have any seating arrangement nearby to sit down at regular intervals.

	However, management arrange a sitting arrangement in the corner of the huge floor and labeled as for pregnant and standing workers, but workers know this only for pregnant women and they have no opportunity to use this.
Legal Reference	ILO Recommendation 102; Section 74 BLA; Rule 63, BLR; Ergonomic Checkpoints: Practical and easy-to-implement solutions for improving safety, health and working conditions. 2d ed. ILO 2010, Checkpoints 6, 9, 54, 58, 59

## **Working Environment**

Issue	Workplace noise levels (Ref 18250)
Question	Are worker exposures to noise in line with legal requirements?
Finding	During the factory tour, a high level of noise was found in the embroidery section, knitting section, generator room, boiler room, compressor room, WTP due to the regular use of generator, boiler, compressor. As per the factory-provided noise test report 31 march 2024, the mentioned area's noise level was 80 decibel to 106 decibel. Interviewed workers indicated that they become used to the persistent loud noises. However, management provide ear plug and ear muff to the workers.
Legal Reference	ILO Convention 148; Recommendation 97; Rule 68(xxvii), BLR
Issue	Environmental Clearance Certificate
Question	Are waste disposal/discharge permits available and up to date?
Finding	The environmental Clearance Certificate (ECC) bearing number 23-110377 was expired on 15 July 2024. However management applied for renewal on 10 July 2024.
	The environmental Clearance Certificate (ECC) for Captive Power Plant bearing number 24-116682 was expired on 1 January 2025. Management confirm that renewal under process.
Legal Reference	Bangladesh Environment Conservation Act, 1995 (Amended 2010); Environment Conservation Rules, 2023

## **Working Time**

#### Leave

Issue	Time off for festival holidays (Ref 18287)
Question	Which of the following types of leave is the facility failing to provide workers time off for, as legally required? (SELECT all that apply with a "X") - All public holidays
Finding	Document review and interviews with the workers and management indicated that the facility management did not provide workers legally required at least 11 festival holidays per year. For example, management selected 12 days as festival holidays for the 2025 calendar year, however 02 out of 12 days are the factory's weekly holidays (Weekend and Shaheed Dibash, International Mother Language Day).  Document checked: Festival holiday list for 2025.

#### Overtime

Leave	Lineita an according to the constitute to the constitute of (Def. 10000)
Issue	Limits on weekly overtime hours worked (Ref 18280)
Question	Which legal overtime limits are not being complied with? (SELECT all that apply with a "X') - Weekly limits on overtime hours worked
Finding	Document review and interviews with workers and management indicated that the employer did not comply with limits on overtime hours. The following overtime hours were noted to exceed with the legal limit (Government exempted limit of OT) of weekly 72 hours as mentioned in circular nunber: 40.00.0000.016.30.008.17.118 and 40.00.0000.016.30.112.17-77 issued by the Wage Board Branch, Ministry of Labor and Employment on 8 October 2023 and 01 July 2024 respectively.
	In December 2024:
	In the Cutting section: maximum 15 OT hours (total 63 hours) in a week.
	In the Sewing section: maximum 15 OT hours (total 63 hours) in a week.
	In the Finishing section: maximum 21.87 OT hours (total 69.87 hours) in a week.
	In the Knitting section: maximum 14 OT hours (total 62 hours) in a week.
	In the Dyeing section: maximum 00 OT hours (total 48 hours) in a week
	In the Printing section: maximum 36 OT hours (total 84 hours) in a week
	In the Embroidery section: maximum 15 OT hours (total 63 hours) in a week.
	In April 2024:
	In the Cutting section: maximum 34 OT hours (total 82 hours) in a week.
	In the Sewing section: maximum 31 OT hours (total 79 hours) in a week.
	In the Finishing section: maximum 21.87 OT hours (total 69.87 hours) in a week.
	In the Knitting section: maximum 23 OT hours (total 71 hours) in a week.
	In the Dyeing section: maximum 19 OT hours (total 67 hours) in a week
	In the Printing section: maximum 25 OT hours (total 73 hours) in a week
	In the Embroidery section: maximum 18 OT hours (total 66 hours) in a week.
	In January 2024:
	In the Cutting section: maximum 28 OT hours (total 76 hours) in a week.
	In the Sewing section: maximum 26 OT hours (total 74 hours) in a week.
	In the Finishing section: maximum 36 OT hours (total 84 hours) in a week.
	In the Knitting section: maximum 00 OT hours (total 48 hours) in a week.
	In the Dyeing section: maximum 00 OT hours (total 48 hours) in a week
	In the Printing section: maximum 36 OT hours (total 84 hours) in a week.
	In the Embroidery section: maximum 15 OT hours (total 63 hours) in a week.
	Document checked: Payroll and job cards for December, April and January 2024.

Legal Reference	Sections 2(66), 100, 102, BLA; Rule 99(1), BLR
Issue	Limits on daily overtime hours worked (Ref 18280)
Question	Which legal overtime limits are not being complied with? (SELECT all that apply with a "X') - Daily limits on overtime hours worked
Finding	Document review and interviews with workers and management indicated that the employer did not comply with limits on overtime hours. The following overtime hours were noted to be more than the legal limit of daily 4 hours (08 regular hours, 04 OT hours) as mentioned in circular nos40.00.0000.016.30.008.17.118,40.00.0000.016.30.008.17.198 and 40.00.0000.016.30.012.17.77 issued by the Ministry of Labour and Employment on 17 May 2023, 08 October 2023 and 01 July 2024 respectively. Assessors noted the following working hours in the reviewed months in different sections.
	In December 2024:
	In the Cutting section: maximum 03 OT hours (total 11 hours) in a day.
	In the Sewing section: maximum 03 OT hours (total 11 hours) in a day.
	In the Finishing section: maximum 05 OT hours (total 13 hours) in a day.
	In the Knitting section: maximum 06 OT hours (total 14 hours) in a day.
	In the Dyeing section: maximum 00 OT hours (total 8 hours) in a day.
	In the Printing section: maximum 00 OT hours (total 8 hours) in a day.
	In the Embroidery section: maximum 03 OT hours (total 11 hours) in a day.
	In April 2024:
	In the Cutting section: maximum 06 OT hours (total 14 hours) in a day.
	In the Sewing section: maximum 06 OT hours (total 14 hours) in a day.
	In the Finishing section: maximum 06 OT hours (total 14 hours) in a day.
	In the Knitting section: maximum 04 OT hours (total 14 hours) in a day.
	In the Dyeing section: maximum 03 OT hours (total 11 hours) in a day.
	In the Printing section: maximum 06 OT hours (total 14 hours) in a day.
	In the Embroidery section: maximum 03 OT hours (total 11 hours) in a day.
	In January 2024:
	In the Cutting section: maximum 06 OT hours (total 14 hours) in a day.
	In the Sewing section: maximum 06 OT hours (total 14 hours) in a day.
	In the Finishing section: maximum 06 OT hours (total 14 hours) in a day.
	In the Knitting section: maximum 04 OT hours (total 12 hours) in a day.
	In the Dyeing section: maximum 00 OT hours (total 08 hours) in a day.
	In the Printing section: maximum 04 OT hours (total 12 hours) in a day.
	In the Embroidery section: maximum 03 OT hours (total 11 hours) in a day.
	Document checked: Payroll and job cards for December, April and January 2024.
Legal Reference	Sections 2(66), 100, 102, BLA; Rule 99(1), BLR

## **Additional Information**

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

#### Child Labour

#### **Child Labourers**

Question	Were any workers under the legal minimum working age when hired?
Finding	Based on observations, document reviews and interviews with workers and management indicated that the enterprise did not employ workers under the age of 14. Management stated that the hired workers were at least 18 years old.  Document checked: HR records for 20 workers.
Legal Reference	ILO Convention 138; Sections 2(Lxiii), 34(1), BLA

#### **Documentation and Protection of Young Workers**

Question	Does the facility verify minimum age requirements prior to hiring workers? (Ref 9003)
Legal Reference	ILO Convention 138; Recommendation 146; Section 36, BLA; Rule 34 and Form 15, BLR

If yes, please describe what legal documentation or other proof of age are reviewed to verify minimum age requirements and whether copies are maintained: It was observed through document review, interviews with workers, and management indicated that management required workers to provide the following original document to verify their age prior to hiring: a national identification card, birth registration certificate, school certificate, or certificate from a registered physician certifying the age of the person concerned. The in-house doctor examines workers' physical appearance, teeth for female workers, and facial hair for male workers to confirm their age and fitness for the job.

Document checked: Review Personal file of randomly selected 10 workers.

#### Freedom of Association and Collective Bargaining

#### Freedom to Associate

Question	Are workers free to form a trade union of their choosing? (Ref 18371)
Finding	Based on information gathered from the publicly accessible Department of Labor (DOL) website and also confirmed by management and worker interviews that there is a union in the factory named IRIS Fabrics Ltd. Sromic Union with Registration Number Dhaka- 5816, which received registration on 23 May 2022. EAs observed that factory management was not opposed to workers exercising their Freedom of Association (FoA) rights. Interviews with workers indicated that workers were aware of the union membership process and other union activities. Moreover, policies on FoA were communicated to the workers through the notice board.

Legal Reference ILO Convention 87; Sections 176(a), 179, 183, 190, 193, BLA; Rules 167, 176, and Forms 5 61(A), BLR	5(A),
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### Compensation

### Minimum Wages/Piece Rate Wages

Question	If yes, please select all the categories of workers for which any workers in the category did not receive at least the legal minimum wage: (SELECT all that apply with a "X") - Permanent workers
Finding	Document review, interviews with workers and management indicated that the management paid regular permanent workers in accordance with the Minimum Wage Gazette 2023 considering the worker's designation and grade (for ordinary hours of work). Management paid regular permanent workers in accordance with the individually negotiated amount based on the appointment letter and not less than the minimum wage circular.
	Workers confirmed that they received the amounts shown in the payroll.
	Document checked: Payrolls for January, April and December 2024.
Legal Reference	Sections 148, 149, BLA; Rule 133(1), BLR; Minimum Wage Gazette for RMG Sector, 2023; Minimum Wage Gazette for Cotton Textile Sector. May 2018.

#### Paid Leave

Question	Which of the following types of leave is the facility failing to pay workers for, as legally required? (SELECT all that apply with a "X") - Maternity leave (Ref 18382)
Finding	Document reviews, management and workers interviews indicated that management provided 120 days of paid maternity leave to workers who had worked in the factory for not less than six months immediately preceding the day of delivery. Workers receive their average monthly earnings during the three months preceding the leave, including overtime pay and bonuses. Workers received these payments within 3 working days of providing proof of the pregnancy/birth as per the worker's preferred mode of payment.
	There were a total of 41 pregnant workers availed of maternity leave in the last 12 months. Interviewed workers confirmed that the employer pays workers' benefits correctly when women take maternity leave.
	Document checked: 05 maternity workers' personnel files, maternity leave register, and benefits calculation at random.
Legal Reference	Sections 45-49, BLA; Rules 38, 39, Forms 18, 18A, and 19, BLR

### **Contracts and Human Resources**

## Dialogue, Discipline and Disputes

Question	Are there any bipartite committee(s) in place at the facility? (Ref 18365)
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Finding	Document review, management and workers interview indicated that there is a union in the factory named IRIS Fabrics Sromik Union. (registration number Dhaka-5816) that was formed on 23 May 2022.  No PC is present, but none is legally required, because there is a union.
Legal Reference	ILO Convention 135; Sections 205-208, BLA; Rules 183-201, BLR
Are bipartite committee(s) established and functioning in line with legal requirements? (Ref 18365) Yes	

Question	Are facility practices failing to comply with any legal requirements not covered elsewhere regarding Workplace Cooperation, Grievances and Disputes?
Finding	The management declared general holidays on 6 and 7 January 2025, since workers were demanding to increase attendance bonus, increment etc. During these period, the factory management stopped all production process due to safety and security issue, hence the management declared general holidays.  Management also mentioned that they have terminated 134 workers.
Legal Reference	None

# **Employment Contracts**

Question	Do all persons who perform work for the facility, both on the premises and offsite, have a contract? (Ref 9062)
Finding	Document reviews and interviews with workers and management indicated that all workers who worked for the factory had a letter of appointment. Workers were hired on a probationary basis for 03 months at the start of their undetermined duration letter of appointment. All workers' employment contracts were written. Management provided all workers with a copy of their letter of appointment.  Document checked: HR records for 10 workers.
Legal Reference	Section 5, BLA; Rule 19, BLR

## Occupational Safety and Health

## **Emergency Preparedness**

Question	Does the facility conduct regular emergency drills for all workers and are they in line with legal requirements? (Ref 18256)
Finding	Document review, and interviews with the management and workers indicated that the enterprise management conducted emergency evacuation drills at least once every six months. The last three fire drills were conducted on 04 November 2024, 22 September 2024 (night), and 10 July 2024. Workers confirmed that they knew how to react in case of an emergency.
Legal Reference	Section 62(7, 8), BLA; Rule 55(14), BLR; Guidelines for Assessment of Fire and Electrical Safety of Existing RMG Factory Buildings in Bangladesh, Section 3.8

### **OSH Management Systems**

Question	Does the facility have an occupational safety and health (OSH) committee? (Ref 18242)	
Legal Reference	ILO Convention 155 and Recommendation 164; Section 90(a), BLA; Rules 81-85, Schedule IV, BLR	
How many union	representatives are in the OSH committee? 0	
How many worker members are in the OSH committee? 5		
How many female members are in the OSH committee? 2		
How many employer members are in the OSH committee? 5		
How many members are in the OSH committee? 10		

## **Working Time**

### Regular Hours

Question	Do regular working hours exceed legal requirements? (Ref 9001)
Finding	Document review and interviews with workers and management indicated that normal working hours did not exceed 8 hours per day. General Shift: 08:00 am to 05:00 pm for sewing, cutting, and finishing sections, 6 days per week (48 hours per week) from Saturday to Thursday. Friday is the weekend.
	Knitting, dyeing and security section operated in 3 shifts (shift A: 06:00 am-02:30 pm, shift B: 02:00 pm-10:30 pm, shift C: 10.00 pm- 06.30 am), 6 days per week (48 hours per week); weekend is on rotation basis.
	Document checked: Internal regulations, working hours posted in the workplace, and time records for the months of Payroll and job cards for December, April and January 2024.
Legal Reference	Sections 100, 102, BLA; Rule 99(1), BLR
Number of regular weekly hours worked at the facility: 48	
Number of regular daily hours worked at the facility: 8	

# **Better Work Clusters and Compliance Points**

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

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

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

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