



**BetterWork**

# **16th Biannual Synthesis Report**

Under the HOPE II Legislation

Haiti

---

30 APRIL 2018



International  
Labour  
Organization



**International  
Finance  
Corporation**  
WORLD BANK GROUP

#### ILO CATALOGUING IN PUBLICATION DATA

Better Work Haiti

16th Synthesis Report under HOPE II Legislation

International Labour Office

synthesis report / labour law / hope legislation / haiti / garment

April 2018

Copyright © International Labour Organization (ILO) and International Finance Corporation (IFC)

April 2018

Publications of the ILO enjoy copyright under Protocol 2 of the Universal Copyright Convention. Nevertheless, short excerpts from them may be reproduced without authorization, on condition that the source is indicated. For rights of reproduction or translation, application should be made to the ILO, acting on behalf of both organizations: ILO Publications (Rights and Permissions), International Labour Office, CH-1211 Geneva 22, Switzerland, or by email: [pubdroit@ilo.org](mailto:pubdroit@ilo.org). The IFC and ILO welcome such applications.

Libraries, institutions and other users registered with reproduction rights organizations may make copies in accordance with the licences issued to them for this purpose. Visit [www.ifro.org](http://www.ifro.org) to find the reproduction rights organization in your country.

The designations employed in this, which are in conformity with United Nations practice, and the presentation of material therein do not imply the expression of any opinion whatsoever on the part of the IFC or ILO concerning the legal status of any country, area or territory or of its authorities, or concerning the delimitation of its frontiers.

The responsibility for opinions expressed in signed articles, studies and other contributions rests solely with their authors, and publication does not constitute an endorsement by the IFC or ILO of the opinions expressed in them.

Reference to names of firms and commercial products and processes does not imply their endorsement by the IFC or ILO, and any failure to mention a particular firm, commercial product or process is not a sign of disapproval.

ILO publications can be obtained through major booksellers or ILO local offices in many countries, or direct from ILO Publications, International Labour Office, CH-1211 Geneva 22, Switzerland. Catalogues or lists of new publications are available free of charge from the above address, or by email: [pubvente@ilo.org](mailto:pubvente@ilo.org)

Visit our website: [www.ilo.org/publns](http://www.ilo.org/publns)

Cover photo: ©ILO/IFC

Printed by ILO



Copyright © International Labour Organization (ILO) and International Finance Corporation (IFC) (2018)

First published (2018)

Publications of the ILO enjoy copyright under Protocol 2 of the Universal Copyright Convention. Nevertheless, short excerpts from them may be reproduced without authorization, on condition that the source is indicated. For rights of reproduction or translation, application should be made to the ILO, acting on behalf of both organizations: ILO Publications (Rights and Permissions), International Labour Office, CH-1211 Geneva 22, Switzerland, or by email: [pubdroit@ilo.org](mailto:pubdroit@ilo.org). The IFC and ILO welcome such applications.

Libraries, institutions and other users registered with reproduction rights organizations may make copies in accordance with the licenses issued to them for this purpose. Visit [www.ifrro.org](http://www.ifrro.org) to find the reproduction rights organization in your country.

---

#### ILO Cataloging in Publication Data

Better Work Haiti: apparel industry 16th biannual synthesis report under the HOPE II legislation / International Labour Office; International Finance Corporation. - Geneva: ILO, 2018

1 v.

ISSN 2227-958X (web pdf)

International Labour Office; International Finance Corporation

Clothing industry / textile industry / working conditions / workers' rights / labor legislation / ILO Convention / international labor standards / comment / application / Haiti

08.09.3

---

The designations employed in this, which are in conformity with United Nations practice, and the presentation of material therein do not imply the expression of any opinion whatsoever on the part of the IFC or ILO concerning the legal status of any country, area or territory or of its authorities, or concerning the delimitation of its frontiers.

The responsibility for opinions expressed in signed articles, studies and other contributions rests solely with their authors, and publication does not constitute an endorsement by the IFC or ILO of the opinions expressed in them.

Reference to names of firms and commercial products and processes does not imply their endorsement by the IFC or ILO, and any failure to mention a particular firm, commercial product or process is not a sign of disapproval.

ILO publications can be obtained through major booksellers or ILO local offices in many countries, or direct from ILO Publications, International Labour Office, CH-1211 Geneva 22, and Switzerland. Catalogues or lists of new publications are available free of charge from the above address, or by email: [pubvente@ilo.org](mailto:pubvente@ilo.org)

Visit our website: [www.betterwork.org](http://www.betterwork.org)



## Acknowledgements

Better Work Haiti is supported by the US Department of Labor.

Core donors to Better Work are: Netherlands Ministry of Foreign Affairs, Swiss State Secretariat for Economic Affairs (SECO), Danish International Development Agency (DANIDA), Australian Department of Foreign Affairs and Trade, German Federal Ministry for Economic Cooperation and Development, and the US Department of Labor.

Funding is also provided by Canada Department Foreign Affairs, The European Commission, DFID, German Federal Ministry for Economic Cooperation and Development, GIZ; Royal Government of Cambodia, Garment Manufacturers Association in Cambodia and private sector donors, including The Walt Disney Corporation, Inc., Levi Strauss Foundation, Gap Inc.

*This publication does not necessarily reflect the views or policies of the organizations or agencies listed above, nor does mention of trade names, commercial products, or organizations imply endorsement by them.*



## Table of Contents

<b>List of Tables and Charts</b> .....	<b>4</b>
<b>List of Acronyms</b> .....	<b>5</b>
<b>Section I: Introduction and Context</b> .....	<b>6</b>
1.1. Country Context and Industry Updates .....	7
1.2. TAICNAR Program Activities in the Reporting Period .....	9
<b>Section II: Highlights from the Reporting Period</b> .....	<b>10</b>
2.1. Compliance Situation in Haiti’s Exporting Garment Sector .....	12
2.2. Compliance Performance with regards to International Core Labor Standards .....	14
Child Labor .....	14
Discrimination .....	14
Forced Labor .....	14
Freedom Of Association And Collective Bargaining .....	14
2.3. Compliance Performance with regards to National Labor Standards .....	17
Compensation .....	17
Social Security And Other Benefits .....	18
Paid Leave .....	19
Overtime Wages .....	19
Contracts And Human Resources .....	20
Occupational Safety And Health .....	21
Working Time .....	23
2.4. Advisory and Training Services in the Reporting Period .....	24
Better Work Advisory Services .....	24
Better Work Trainings .....	26
<b>Section III: Conclusion and Next Steps</b> .....	<b>27</b>
<b>Annex 1. The TAICNAR Project and Reporting Requirements under the HOPE II Legislation</b> .....	<b>30</b>
<b>Annex 2. Better Work’s Service Delivery Model</b> .....	<b>32</b>
<b>Annex 3. The Better Work Compliance Assessment Methodology</b> .....	<b>35</b>
Better Work Compliance Assessment Framework .....	35
Calculating Non-Compliance & Public Reporting .....	42
Limitations in the Assessment Process .....	42
<b>Annex 4: Factories in Detail</b> .....	<b>45</b>
List of Factories .....	45
Findings from the Factories .....	46



---

## List of Tables and Charts

<b>Chart 1:</b> Non-compliance rates for 23 factories assessed between March 2017 and February 2018 over two Better Work cycles .....	13
<b>Table 1:</b> Factory's PICC Status .....	24
<b>Table 2:</b> Better Work compliance assessment framework .....	35
<b>Table 3:</b> List of factories in the Haitian apparel sector which have been assessed between October 2016 and September 2017.....	46



## List of Acronyms

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



---

## Section I: Introduction and Context

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

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

The two components of HOPE II’s TAICNAR program aim at strengthening labor compliance of the industry in Haiti. The first of these elements focuses on assessing compliance with core labor standards and national labor law, supporting remediation efforts, and publicly reporting on the progress of each factory on the Labor Ombudsman’s register. The second element of the TAICNAR program consists of technical assistance to strengthen the legal and administrative structures for improving compliance in the industry. The scope of these services is extensive, encompassing technical assistance from the ILO in reviewing national laws and regulations to bring them into conformity with international standards,

---

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





raising awareness of workers' rights, and training labor inspectors, judicial officers and other government personnel.

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

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

### **1.1. COUNTRY CONTEXT AND INDUSTRY UPDATES**

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

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

The apparel industry is also among the largest employers within Haiti, creating jobs for approximately 48,000 people according to data from January 2018 from the employers association ADIH. The workforce in this industry therefore saw a growth of roughly 20 percent since January 2017 when this figure still stagnated at 40,000 (since mid-2015). Most workers (about 65-70%) are women who support several family members. It has to be noted, that ADIH includes management staff in these calculations. Based on Better Work's data collection over more than six years in



Haiti's apparel industry, one can say that management staff accounts to approximately 10-15% in the factories. Therefore, the number of production workers lies at around 41,000-43,000. ADIH continues to update these figures based on statistics provided by its member companies several times a year. Currently, the biggest companies in the sector remain S&H Global (11,283 employees) and CODEVI (9,750 employees), both located in Haiti's North. The number of exporting factories remains between 20 and 30 enterprises. A few new investors have recently or are currently planning to start operations in the industry in Haiti. There continues to be a general trend in shift of production from the capital in Port-au-Prince to the North of the country. The combined workforce of the factories in the North represents now almost 45% of the total employment in the sector.

In September 2017, a new law related to the organizing and regulating work over a 24-hour period divided into three segments of eight hours was published in the *Moniteur* abrogating and revising a number of articles of the current law in place. The employers view this law as an important step to increase employment in the sector. Since the proposal for this new law was submitted to the Haitian parliament, the unions (SOTA-BO, CTSP and CNOHA) have denounced the fact that the consultation process was not tripartite. In correspondences sent to the Ministry of Labor before the strikes that took place in May and June 2017 the unions requested the Haitian government to hold on the publication of this specific law in order to focus on the labor law reform that started in 2012. One of the unions (CTSP) submitted a copy of this new law to the ILO Committee of Experts on the Application of Conventions and Recommendations (CEACR) for review. As this new Act has an effect on the application of all the Conventions ratified by Haiti on working time, namely Conventions Nos 1 and 30 (hours of work) and 14 and 106 (weekly rest), the Committee of Experts agreed with this request and sent its comments in February 2018. In the comments, the Committee of Experts noted that this new law eliminated the articles that limited regular daily working hours, the details related to possible exceptions to normal hours of work, and the articles that established a minimum weekly rest period of 24 consecutive hours to be granted preferably on Sunday and simultaneously to the whole staff of an establishment. Better Work Haiti will assess compliance with the new law in line with the ILO conventions on working time ratified by Haiti. Although the new law abrogated provisions of the Labour Code that limited daily working hours and required a weekly rest day, Better Work will assess compliance based on the relevant standards set forth in the ILO conventions. ILO Convention 14 on Weekly Rest in Industry requires a weekly day of rest, and ILO Convention 1 on Hours of Work in Industry limits daily working hours to 8 hours per day and 48 hours per week (with an allowance for up to 9 hours in a day if other day(s) in the week are shorter than 8 hours). Provisions in the new law that are consistent with the standards in the conventions ratified by Haiti will be assessed in line with the law.



## 1.2. TAICNAR PROGRAM ACTIVITIES IN THE REPORTING PERIOD

### ***TAICNAR Program Component 1: Compliance Assessments and Remediation Support***

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

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

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

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

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

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

Several key activities which implemented by the project team and its constituents are listed below:



- ◆ A taskforce of labor inspectors received substantial training covering all areas related to their duties; their job descriptions were revised and joint factory visits conducted with BWH team members;
- ◆ A specialization training was organized with the International Training Centre (ITC) of the ILO for the Haitian Labor Judges and Lawyers who are trainers at the School of Magistrate in Haiti (EMA);
- ◆ A MAST call center was initiated;
- ◆ An Information, Education and Communication Campaign (IEC Campaign) was prepared;
- ◆ Technical and financial assistance was provided to start the work on archiving key documents at MAST;
- ◆ Technical and financial assistance was provided on updating the MAST website;
- ◆ Logistics support was provided to the Labor Inspection Service by putting a vehicle at their disposition.

With the new phase of the Better Work Haiti program from 2018 – 2022, capacity building of all tripartite constituents – including Government partners – has become a key area of focus for the program. Hence, activities conducted and initiated under the ILO/MAST program will be continued and completed by BWH.

---

## Section II: Highlights from the Reporting Period

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



- ◆ In late 2017, the program finalized its new 5-year strategy for the Better Work Haiti program (2018 - 2022) with a stronger focus on capacity building of national constituents. Capacity building of worker representatives and union organizations, employers and the Government will be key for purposes of institutional sustainability of BWH efforts.
- ◆ A tripartite meeting of Haitian stakeholders was held in March 2018 in San Jose/ Costa Rica. The meeting which was initiated and organized by the ILO concluded in an agreement signed by all parties which reiterated their commitment to the Decent Work Country Program signed in 2015, the need for social dialogue including the institutionalization of such dialogue, the commitment to work on improving the work environment in the country including respect of international labor laws ratified by Haiti, improving social security coverage and service etc.
- ◆ In mid-2017, Better Work Haiti initiated a collaboration with the social security institutions ONA and OFATMA. Based on BWH's compliance information, most factories of the garment sector are not fully compliant with regards to all legal requirements concerning social security. While some factories still have not signed up to the newly available maternity and health insurance, most non-compliances on social security refer to incorrect and/or late payments of social security contributions. In return, the private sector and also workers' representatives are not satisfied with the level of services available for beneficiaries by ONA and OFATMA. BWH therefore started a dialogue with the parties concerned in order to increase social security coverage and level and quality of services of ONA and OFATMA for workers in the garment sector. An action plan with concrete milestones in the collaboration is being developed as part of BWH's new 5-year strategy.
- ◆ Given the strikes in 2017 and the recurrence of industrial disputes at individual factory and sectoral level, Better Work continues to work closely with the Office of the Labor Ombudsman and worker and employer representatives on improved mechanisms for social dialogue. At the factory level, this happens through the bipartite committees (PICCs) while at the sectoral level, BW is seeking to assist in the revitalization of the social dialogue table for the garment sector. In addition, strengthening other platforms for social dialogue is also part of BWH's efforts, such as the support of the Social Dialogue Table for social protection (cross-sectoral).



## 2.1. Compliance Situation in Haiti's Exporting Garment Sector

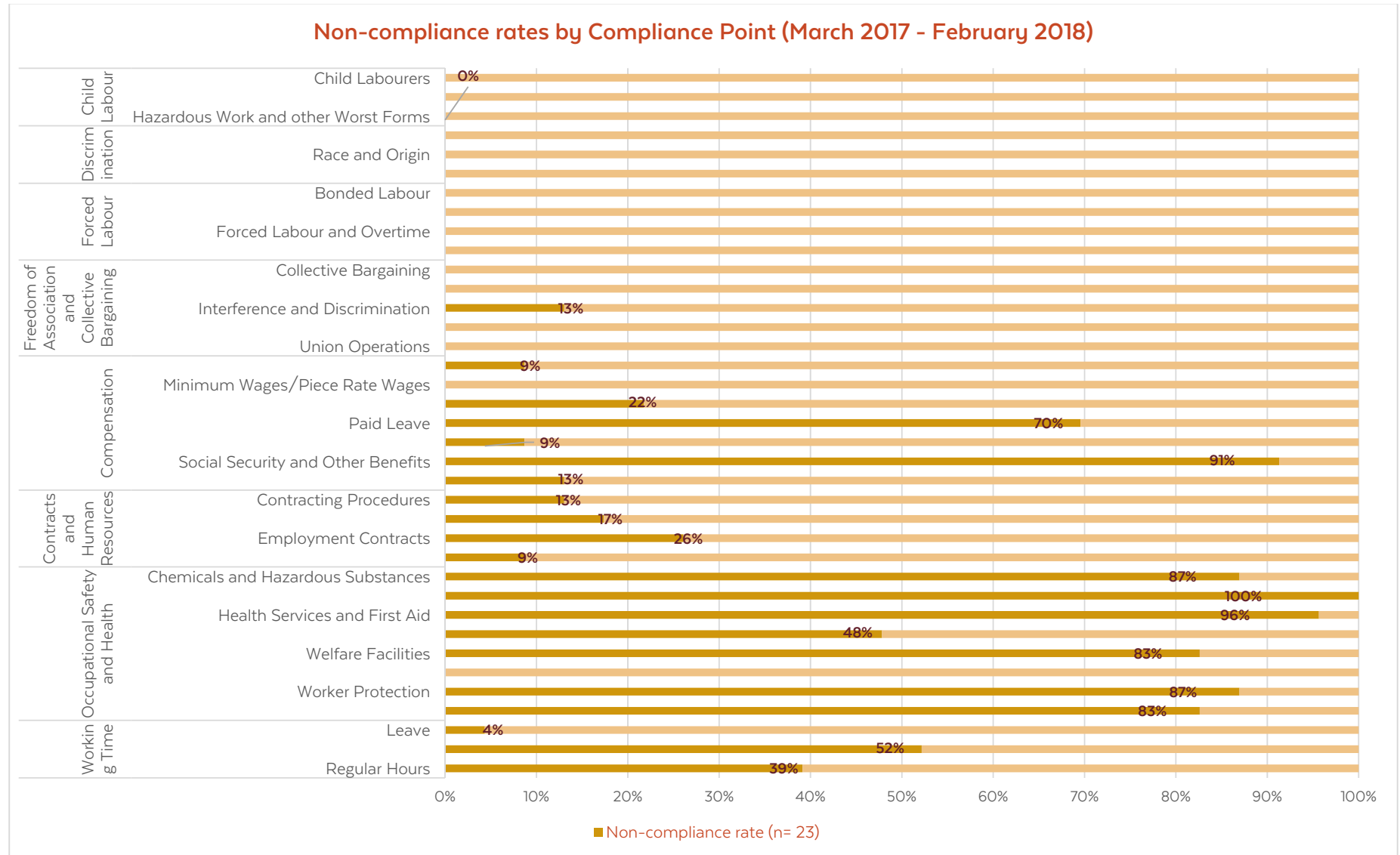
Better Work assesses participating factories once per year and works with each factory before and after this assessment to remediate non-compliance issues. While the assessment is a one-time activity once per year, advisory and training services delivered by the Better Work team focus on continuous learning and improvement. For more information on the Better Work service delivery model as well as the Better Work assessment methodology, please consult annex 2 and annex 3 respectively. The section presents the results of assessments, advisory and training services provided to all 27 participating factories in the period between March 2017 and February 2018. Assessment information is included for factories that have been assessed at least twice by Better Work.

Chart 1 presents non-compliance findings for the 23 assessed factories in Haiti who had a minimum of two Better Work compliance assessments, showing non-compliance rates in brackets. A factory is found non-compliant in a compliance point if it is found out of compliance on any one aspect of it. Please note that as these reports are issued biannually, yet assessments are being done on an annual basis, issues are reported in two consecutive reports. In the individual factory tables in Annex 4 of this report, progress on the remediation of non-compliance issues can be followed in further detail.

It has to be noted that many issues found during Better Work assessments are persisting non-compliance issues. The overall compliance rates for the sector are stagnating with minor variations over the cycles. Better Work is observing this issue, not only in Haiti but also in its other country programs. The focus on management systems during advisory and training continues to help in tackling this problem. However, additional measures may be necessary to address persistent non-compliance issues. Better Work's differentiation approach that will be implemented in 2018 may provide some incentives for factories to further improve their compliance. Moreover, Better Work's collaboration with national labor ministries is also crucial to address this general challenge.



Chart 1: Non-compliance rates for 23 factories assessed between March 2017 and February 2018 over two Better Work cycles





## 2.2. Compliance Performance with regards to International Core Labor Standards

During the last round of assessments between April 2017 and March 2018 in 23 factories, the following results with regards to core labor standards have been observed.

### CHILD LABOR

---

Child Labor is virtually non-existent in the apparel sector in Haiti. There were no non-compliance findings under the Child Labor cluster in the period under review.

### DISCRIMINATION

---

During the reporting period, no cases of non-compliance related to discrimination were identified. In the past, non-compliance points under this cluster were mainly cases of sexual harassment. Although no non-compliance cases were confirmed during the reporting period, BWH has collected evidence indicating that sexual harassment is a widespread practice in the industry in Haiti and elsewhere (see Limitations in the assessment process in annex 3). Awareness raising and prevention of sexual harassment has hence become part of BWH's advisory and training portfolio and is one main areas of focus in the new BWH strategy 2018 - 2022. Collaboration with other organizations are also planned in order to address this issue.

### FORCED LABOR

---

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

### FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

---

There are three cases of non-compliance under the Cluster for Freedom of Association and Collective Bargaining, all under the compliance point of Interference and Discrimination. Two cases were already reported in the October 2017 report. For remediation efforts on all of these cases, please consult individual factory tables in Annex 4 of this report.





In the most recent case of a factory cited in non-compliance under this compliance point, the case was made under the above mentioned compliance point under the question on termination or non-renewal of worker's employment contract due to union membership or activities.

Eight union leaders were terminated for having at least 4 days of unauthorized absence during May 2017. On May 17 the union submitted a copy of the letter announcing the sectorial strike set to take place on May 19, 2017. The notice provided to the employer was a copy of the sectorial strike notice provided by PLASIT-BO, CNOHA and GOSTRA-CTSP to ADIH and MAST, and indicated that the work stoppages would continue until workers' demands were met. Better Work considers that the strike was not subject to a limit in duration under Article 206 of the Labor Code since the notice was provided to employers and the ministry prior to the strike. Following the terminations, the Ombudsperson conducted two mediation sessions with the employer and the union federation upon the request of SOTA/BO, in which the employer was asked to reinstate the terminated union officers. The employer informed the Ombudsperson and the union that they would not reinstate the terminated union officers. Management subsequently has provided the 8 terminated union officers with their severance payment including payment for notice, however, seven out of eight of the union officers have not agreed to sign waivers giving up the possibility of bringing claims against the employer for wrongful termination in the future. Also, it was not possible to reliably verify the claim by management that all these workers had at least 4 days of unauthorized absence during May 2017. Information provided to Better Work Haiti during the factory visit and subsequently by email shows inconsistencies between the payroll records, punch card attendance records and manual attendance records kept by supervisors. In any case, the evidence demonstrates that the union officers were absent in order to participate in sectorial strikes, which does not justify their terminations for unauthorized absences.

In the case of this factory, Better Work recommends to reinstate the 8 terminated union officers with compensation for back pay.

As previously mentioned, the two other cases of non-compliance under this cluster fall under the same compliance point of interference and discrimination and the same sub-question on termination or non-renewal of worker's employment contract due to union membership or activities. In both cases, Better Work recommends to reinstate the terminated workers with compensation for back pay. Better Work also made the following industry wide recommendations after a series of strikes in 2017:

- ◆ The employers and Trade Union Representatives that are present on the Social Dialogue Table (ideally in consultation with employers and unions that are not titular members of the Social Dialogue Table) should consider



a review and amendment - as necessary - of the Terms of Reference of the Social Dialogue Table, to ensure that it is functionally representative of employer and worker interests in the export garment and textile industries and that it meets on a regular basis with clear outcomes.

- ◆ Review and revise as necessary provisions in the Labor Law Guide relating to strikes, so that they fully and accurately reflect Haitian Law and international labor standards.
- ◆ In the ongoing Labor Law reform process, the Government of Haiti and the social partners should work to ensure that there is adequate protection for factory level trade union officers in carrying out their representative functions, with adequate protection against acts of anti-union discrimination, including during recruitment, hiring, employment and termination.
- ◆ In collaboration with the ILO, the Government of Haiti, in partnership with the social partners in Haiti, may consider a review and amendment of the Terms of Reference of the Superior Council of Wages (Conseil Superior des Salaires, or CSS), including the selection process and mandate of representatives. The trade unions in the sector, with the support of ILO ACTRAV and the Global Unions, may consider establishment of a labor caucus for the preparation of, and follow-up to decisions of the CSS.
- ◆ Haitian Employers' and Workers' Organizations may wish to consider a review of the lessons learned from collective bargaining at the enterprise level in Haiti, and if appropriate, request support from the ILO on technical assistance on examining models of collective bargaining that may be most relevant to the garment and textile industry in Haiti, including with respect to representative voices of workers and employers in the process.
- ◆ Factories and trade unions that have negotiated and implemented FOA policies and protocols may consider engaging with workers and other relevant stakeholders, (with ILO support) to determine lessons learned and areas of improvement for better industrial relations.
- ◆ The ILO and MAST should focus on consolidation of the existing collaboration between the Better Work Haiti Program and the Labor Inspectorate Garment Sector Task Force, and develop recommendations for sharing lessons learned and strategies for ensuring maximum effectiveness, efficiency and independence of the inspectorate with other MAST departments.



- ◆ ADIH and Trade Union Federations should provide support to factories and enterprise level union representatives on developing the capacity of employers and unions to resolve rights and interest disputes in line with Haitian law and international labor standards, with the support of the Haitian Labor Ombudsperson and the ILO.

These recommendations were presented to Better Work Haiti's stakeholders and are integrated in the new workplan of the program for the next five years.

### **2.3. Compliance Performance with regards to National Labor Standards**

Better Work assesses compliances with eight clusters, four related to international core labor standards (see previous section) and four with regards to national labor legislation. Each cluster consists of several compliance points and each compliance point is made up of several questions (see Table 3 in the annex for further detail on the structure of the Better Work compliance assessment tool). In this section, selected compliance points will be analysed in further detail. Chart No. 1, which gives an overview of the compliance performance of the full set of factories in the sample, shows that nine compliance points have reached non-compliance rate above the 50% threshold. While several of these non-compliance points have been analysed in detail in past reports, some points with non-compliance rates below 50% will be included in further detail in this edition of the report.

#### **COMPENSATION**

---

In the Compensation cluster, the highest non-compliance rates persist in the compliance point of Social Security and Other Benefits (91%), as well as the compliance point on Paid Leave (70%). 22% of factories were found in non-compliance with regards to overtime wages. The issues for these points are detailed in the tables below. One important change under the legal requirements under the compensation cluster is that the two-tier minimum wage (minimum wage of reference and production wage) was eliminated during the last minimum wage increase in August 2017. Better Work therefore no longer reports the percentage of workers on an incentive scheme earning the production wage as indicated in past reports per individual factory. All assessed factories are in compliance with regards to the payment of the legally required minimum wage.



## SOCIAL SECURITY AND OTHER BENEFITS

Compliance Question	# of factories found NC	NC Rate by Question
Does the employer collect and forward workers contributions to OFATMA?	20	87%
Does the employer collect and forward workers' contributions to ONA?	18	78%
Does the employer pay 3% of workers' basic salary to OFATMA for maternity and health insurance?	20	87%
Does the employer pay 3% of workers' basic salary to OFATMA for work-related accident insurance?	8	35%
Does the employer pay the required employer contribution to ONA?	19	83%
Does the employer pay workers their annual salary supplement or bonus?	1	4%

There is a slight decrease in the level of non-compliance on Social Security and Other Benefits. OFATMA started to meet enterprises individually to discuss the best way to transition to the newly available maternity and health insurance services. So far, a total of 12 factories have registered and started paying their contribution to this insurance scheme. However, only nine of these employers calculate their contributions as 3% of the workers' basic salary. As explained in the previous report, this is due to the fact that in September 2016, the employer's association negotiated an agreement with OFATMA to reduce the contribution rate for the garment industry. However, after the letter of acceptance of this agreement published by OFATMA, no follow-up was made to make this agreement compliant with the legal requirements.

Better Work Haiti also continues to find that payments for work-related accident insurance are late or inaccurate for a number of factories (8). Seventeen factories have also been found non-compliant for payments of workers' and employers' contributions to ONA (pension funds). This level of non-compliance identified relates to late or inaccurate payments of these contributions.

No additional non-compliance in the payments of the annual salary supplement or bonus have been identified since the latest report as most of the factories adjusted their payroll to include the payment of maternity and sick leave in the annual bonus after Better Work Haiti announced that the assessment approach will be adjusted to reflect the requirements of article 148 of the Labor Code after clarification from MAST.



## PAID LEAVE

Compliance Question	# of factories found NC	NC Rate by Question
Does the employer pay workers correctly during breastfeeding breaks?	0	0%
Does the employer pay workers correctly during sick leave?	7	30%
Does the employer pay workers correctly for annual leave?	1	4%
Does the employer pay workers correctly for legally mandated holidays?	13	57%
Does the employer pay workers correctly for maternity leave?	5	22%
Does the employer pay workers correctly for weekly rest days?	12	52%

There is some progress in the compliance rate on the compliance point on Paid Leave, which dropped from 90% to 70%. At the question level, one can see that payments for workers on legally mandated holidays, during sick leave, weekly rest days and maternity leave were calculated on the minimum wage and not on the average wage as required by the law. 13 factories were found in non-compliance for incorrect payment of the legally mandated holidays. However, it is important to mention that this number will probably decrease in the future with the new law on working hours as the legal requirement to pay non-working legally mandated holidays was eliminated.

No factory was found in non-compliance for breastfeeding breaks and one factory's payment for annual leave was found to be incorrect.

## OVERTIME WAGES

Compliance Question	# of factories found NC	NC Rate by Question
Does the employer pay workers 100% above the normal wage for all overtime hours worked at night?	2	9%
Does the employer pay workers 100% above the normal wage for overtime hours worked on legally mandated holidays?	0	0%
Does the employer pay workers 100% above the normal wage for overtime hours worked on weekly rest days?	0	0%
Does the employer pay workers 50% above the normal wage for all ordinary overtime hours worked?	4	17%



The level of non-compliance in the area of overtime wages is related to the fact that some factories paid less than 100% above the normal wage for the overtime hours worked during daily or night hours. However, it is important to mention that the level of non-compliance for the inaccurate payment of overtime hours worked at night is expected to decrease due to the approval of the new law on working hours. In fact, under this new legislation, overtime hours worked at night will be paid 50% above the normal wage.

## CONTRACTS AND HUMAN RESOURCES

In the cluster on Contracts and Human Resources, 17% of factories were cited in non-compliance under the compliance point Dialogue, Discipline and Disputes - all for the same compliance question. 26% of factories were found in non-compliance for Employment Contracts. Further details are outlined in the tables below.

### DIALOGUE, DISCIPLINE AND DISPUTES

Compliance Question	# of factories found NC	NC Rate by Question
Did the employer resolve grievances and disputes in compliance with legal requirements?	0	0%
Do the disciplinary measures comply with legal requirements?	0	0%
Have any workers been bullied, harassed, or subjected to humiliating treatment?	4	17%

The non-compliance in the area of Dialogue, Discipline and Dispute is related to 4 cases of factories where workers reported verbal abuse from their supervisors or managers. In all cases, the issue was reported by at least 50% of interviewed workers, and management was not able to demonstrate evidence of effective implementation of the policies related to verbal abuse. In all cases, BWH Enterprise Advisors also witnessed cases of verbal abuse during the factory tour.

### EMPLOYMENT CONTRACTS

Compliance Question	# of factories found NC	NC Rate by Question
Do all persons who perform work for the factory, both on the premises and offsite, have a contract?	0	0%
Do the contracts comply with the labor code, collective agreement and internal work rules?	3	13%
Do the internal work rules comply with legal requirements?	2	9%



Do the written employment contracts specify the terms and conditions of employment?	2	9%
Do workers understand the terms and conditions of employment?	0	0%

Two factories were found in non-compliance because their internal work rules were not approved by MAST as required by law. This also caused non-compliance for the workers' contracts in these 2 factories where some working conditions such as working hours were not clearly specified. In 3 factories contracts did not comply with the labor code, collective agreements and internal work rules. For example one of these factories had apprenticeship contracts that were not established under the procedures defined by the Haitian labor code.

## OCCUPATIONAL SAFETY AND HEALTH

Among all of the eight clusters that Better Work is assessing, Occupational Safety and Health has always been the cluster with the highest non-compliance rates. It is also important to mention that each factory had at least one non-compliance issue related to the emergency preparedness compliance point, including critical issues such as emergency exits not easily accessible, unobstructed and unlocked during working hours, including overtime. Most of the cases of non-compliance were related to situations where escape routes were obstructed and not easily accessible in case of emergency. Capacity building at factory level is still needed in the area of OSH management systems. In fact, it was observed that in several factories detailed policies on topics such as accident investigation, emergency preparedness plans were not available. Also, when they are available they are not always communicated to the workforce

### EMERGENCY PREPAREDNESS

Compliance Question	# of factories found NC	NC Rate by Question
Are emergency exits and escape routes clearly marked and posted in the workplace?	10	43%
Are flammable materials safely stored?	2	9%
Are possible sources of ignition appropriately safeguarded?	7	30%
Are the emergency exits accessible, unobstructed and unlocked during working hours, including overtime?	10	43%
Are there enough emergency exits?	2	9%
Does the employer conduct periodic emergency drills?	6	26%
Does the workplace have a fire detection and alarm system?	9	39%



Does the workplace have adequate fire-fighting equipment?	16	70%
Has the employer trained an appropriate number of workers to use the fire-fighting equipment?	5	22%

Sixteen factories were cited in non-compliance for inadequate fire-fighting equipment. In the majority of cases, factories have sufficient fire-fighting equipment, but there are maintenance issues and therefore certain extinguishers are found with low pressure.

As previously described, weak management systems continue to lead to relatively high-level of non-compliance in emergency preparedness, as is the case for all OSH issues, in general. Factories do not have functioning mechanisms in place to ensure remediation of previously identified non-compliance findings is done in a sustainable way. From the factories included in this sample, ten were found with obstructed emergency exits, mostly by boxes. No factory was found with locked or inaccessible exits.

Nine factories were found with a fire detection and alarm system that was not fully functional and ten factories had emergency exits or escape routes that were not clearly marked. In seven facilities, sources of ignition were found not properly safeguarded. Often, this relates to mobile phones of workers being charged with cables in close proximity to flammable materials such as fabrics.

Overall, Better Work can also state an improvement in terms of regular emergency drills being conducted in line with Better Work's recommendation of two drills per year. Yet, six factories still did not comply with this requirement. Also, training 10% of the workforce on fire-fighting equipment has improved, yet five of the assessed factories were still found to be in non-compliance.

### OSH MANAGEMENT SYSTEMS

Compliance Question	# of factories found NC	NC Rate by Question
Does the employer have legally required construction/building permits?	0	0%
Does the employer record work-related accidents and diseases and submit the record to OFATMA on a monthly basis?	3	13%
Has the employer developed mechanisms to ensure cooperation between workers and management on OSH matters?	2	9%
Has the employer performed an assessment of general occupational safety and health issues in the factory?	3	13%
Is there an adequate OSH Policy that is signed by top management?	5	22%





Non-compliance in the area of OSH management systems are due to cases of factories where the work-related accident records were not kept or not sent to OFATMA on a regular basis. Also, two factories did not have an active OSH committee at the time of the assessment visit. Three other factories did not have evidence of regular self-assessment of general occupational safety and health issues in the factory. Five additional cases of non-compliance were identified due to the absence of an adequate OSH policy signed by top management.

## WORKING TIME

### OVERTIME

Compliance Question	# of factories found NC	NC Rate by Question
Does the employer comply with limits on overtime hours worked?	9	39%
Does the employer obtain authorization from the Department of Labor before working on Sundays?	0	0%
Does the employer obtain authorization from the Department of Labor before working overtime?	8	35%
Is overtime work voluntary?	2	9%

In nine out of twenty-three factories, Better Work found sections of the factory working overtime beyond legal limits. In most cases, the sections affected by work beyond the legal limit of 80 hours per trimester are security staff and workers in shipping departments. Eight factories were found in non-compliance because they failed to obtain authorization from the Ministry of Social Affairs and Labor (MAST) prior to working overtime. Based on the interviews with workers and management in one factory, EAs were able to note that overtime was not voluntary in two factories. In one example, the internal rules of that factory indicate that workers are entitled to a 1 hour break period, which is included in the work schedule from 7:00 AM to 4:00 PM. However, in practice workers only receive a 30-minute break. In fact, the employee in charge of closing the eating area usually urges the workers to go back to work after 30 minutes of daily break. Workers are obliged to go back to work earlier and they are unaware that they ought to consider the remaining 30 minutes of their break as overtime. This was verified by the EAs while observing the lunch breaks during the assessment and through management and worker interviews. For remediation efforts, please consult individual factory tables in Annex 4.



## REGULAR HOURS

Compliance Question	# of factories found NC	NC Rate by Question
Do regular daily or weekly working hours exceed the legal limit?	2	9%
Does the employer comply with the daily break period?	3	13%
Does the employer give workers at least one day off per week?	0	0%
Does the employer keep working time records that reflect the hours actually worked?	4	17%
Does the employer obtain authorization from the Department of Labor before working at night?	2	9%

The highest rate of non-compliance in the area of regular working hours was due to 4 factories for which the assessors found inaccuracies in the working time records. For example, these factories had unreliable attendance systems and did not properly record changes in the attendance records. Also, two factories were found in non-compliance for exceeding the legal weekly hours limit and two others for not requesting the authorization from the Department of Labor before working at night. Also, three employers did not comply with the daily break period because they give less than the 1.5 hours required by law without MAST approval in the internal work rules and worker's approval in employment contracts.

## 2.4. Advisory and Training Services in the Reporting Period

### BETTER WORK ADVISORY SERVICES

During the reporting period, Better Work Haiti continued its efforts to establish social dialogue mechanisms at factory level through, bipartite committees (PICC). However, these committees need to be supported to become more independent and being able to meet without Better Work presence. The PICC sustainability training program developed by Better Work Global is currently being reviewed and adapted to meet the needs of the Haitian garment factories. Below is an overview of each factory in the Better Work Haiti program and the status of its bipartite committee.

Table 1: Factory's PICC Status

	Name of factory	PICC Status
1	Caribbean Island Apparel S.A.	Set up and functioning
2	Cleveland Manufacturing S.A.(former GMC)	No active PICC



3	CODEVI	Set up and functioning
4	Everest	Newly founded PICC
5	Fairway Apparel S.A.	Set up and functioning
6	Go Haiti S.A.	Setup in progress
7	Goal Export S.A.	Factory closed
8	H4H	Newly founded PICC
9	H&H Textiles S.A.	Newly founded PICC
10	Haiti Premier Apparel S.A.	Set up and functioning
11	Hansae	Set up and functioning
12	Horizon Manufacturing S.A.	Set up and functioning
13	Interamerican Wovens APH S.A.	Set up and functioning
14	Interamerican Wovens S.A.	Setup in progress
15	Life S.A.	Newly founded PICC
16	MAS Akansyel	Set up and functioning
17	MGA Haiti S.A.	Set up and functioning
18	Modas BU IL Haiti S.A.	Set up and functioning
19	Pacific Sports Haiti S.A.	Set up and functioning
20	Palm Apparel S.A.	Set up and functioning
21	Premium Apparel S.A.	Set up and functioning
22	Quality Sewing MFG. S.A.	Set up and functioning
23	S&H Global S.A.	Set up and functioning
24	Sewing International S.A.	Set up and functioning
25	The Willbes Haitian II S.A.	Set up and functioning
26	The Willbes Haitian III S.A.	Newly founded PICC
27	The Willbes Haitian II B S.A.	No active PICC
28	The Willbes Haitian Print Shop S.A.	No active PICC
29	Val D'Or Apparel MFG Haiti S.A.	Set up and functioning



Better Work Haiti continues to advocate for union leaders participation in the bipartite committees to ensure that the program helps to build the capacity and role of union leaders at the workplace.

Although more PICCs are active, the participation of key decision makers from factory management side remains a challenge in some factories and might impact the success of the committees in the future. Enterprise advisors are discussing this issue on a one by one basis with each factory's senior management in order to find a solution, Better Work management also gets involved when needed. In addition to in factory visits conducted during the reporting period, industry seminars were offered as clustered advisory visits to participants from factories as well as MAST and union representatives on the following subjects:

- ◆ Grievance Chemicals management
- ◆ Industrial Relations
- ◆ Better Work compliance assessment framework

The topic of chemicals management was selected in order to address the persistent high non-compliance rate in the industry for chemicals and hazardous substances and any related issues.

The industry seminar on industrial relations was offered as part of the sectorial remediation plan related to the dismissals/disciplinary actions related to the strikes in the sector in May-July 2017. The newest industry seminar on BW's compliance assessment framework was developed to meet the needs of new factories or new staff in any of the participating factories to better understand Better Work's assessment methodology and prepare themselves accordingly.

## **BETTER WORK TRAININGS**

The latest addition to Better Work Haiti training program is the new module on Human Resources Management. This training had great success so far and was delivered to factories both in Port-au-Prince and in the northern area of Haiti. It is also important to note that participants from non-garment factories registered and paid for the training. Also, MAST officials attended this training and were a real added value in terms of sharing of experience. In addition, training was provided for Spanish speaking middle management with the support of the Better Work team in Nicaragua and an external consultant. Better Work also offered the new Management skills training in Spanish in the north for middle managers from the Dominican Republic. Moreover, two training sessions were provided for stakeholders with an external training firm, one training was on business writing skills and a second one was a Training of Trainers. Participants gave excellent feedback after these sessions.



In an overview, the trainings offered by Better Work Haiti during the reporting period include:

- ◆ Human Resources Management
- ◆ Managing People
- ◆ Communication Skills
- ◆ Workers' Rights and Responsibilities
- ◆ Occupational Safety and Health
- ◆ PICC training
- ◆ Emergency Preparedness & Accident Investigation
- ◆ Business Writing Skills
- ◆ Training of Trainers (ToT)
- ◆ Supervisory Skills

Between October 2017 and April 2018, the Better Work Training Team trained a total of 596 participants – management and workers – on the above mentioned training topics, including 163 women. In addition, to the funding received from USDOL, Better Work Haiti received funds from the Walt Disney Company to implement training on supervisory skills and leadership skills (Managing People). Revenues were also generated from non-garment factories' participation in training. Although the amount collected was small as BWH did not specifically target participants from other industries, it is a confirmation that Better Work Haiti can benefit from exploring opportunities of revenues with other industries.

---

## Section III: Conclusion and Next Steps

This 16th synthesis report is the most comprehensive current picture of the compliance performance of exporting garment factories in Haiti. It includes data of 23 factories that were assessed from April 2017 to March 2018 and additional information about the environment in which these factories operate. The Better Work program in Haiti has been monitoring the industry since 2009 and is able to



observe progress overtime and challenges that persist. Some general conclusions that can be drawn to date are summarized below:

- ◆ The general state of the exporting factories registered with Better Work Haiti has followed similar patterns over the past five years. While in the first years of BW in Haiti, factory's compliance levels dropped, this development reached a plateau in recent years. The main challenge is the lack of strong and well established management systems that allow factories to sustainably remediate non-compliance issues.
- ◆ It would be desirable for international buyers sourcing from Haiti to support the remediation process of non-compliance issues in their supplier base. While several buyers are collaborating with Better Work, a number of brands/ retailers conduct their own audits or contract other third party auditors which leads to duplication. This also leads to parallel corrective action plans for the factories which uses resources that could otherwise be spent on actual remediation and improvements. BWH offers more than just social compliance audits once a year, it supports factories in the remediation process through tailored advisory and training services. Hence, a streamlined approach instead of duplication by the different buyers sourcing from the same factory would be a big support for factories in focusing on making actual improvements.
- ◆ The differences between national and international laws around freedom of association and collective bargaining continue to be a source of conflict. These conversations are national level issues being discussed at the broader political level between the ILO and relevant social partners.
- ◆ The relationships between unions and factory management remain tense in many cases. The movement of workers' organizations in the garment sector in Haiti consists of many cells and federations which often do not speak with one voice. Capacity building is needed not only at the level of the union leaders but also for the workforce in general on legal requirements and their rights and responsibilities. Conflicts are often not resolved at the negotiation table and lead to intense labor conflicts, causing production time to be lost. More effective mechanisms are needed for management and worker representatives to regularly consult each other and establish effective mechanisms for fruitful social dialogue.

Better Work took these challenges into consideration when designing its new five year strategy. The focus of the work will shift to address sectoral issues through closer collaboration with national partners. While individual factory level services will continue as per the standard Better Work service model (see annex 2), a stronger



---

focus will be put on addressing issues that appear in this report are also systemic in nature, relating to national level policies, capacity needs of national partners to govern the labor market themselves or to relationships and pressures in the value chain.



---

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

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

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

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

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





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

[...] (D) BIENNIAL REPORT. —The 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. Better Work's Service Delivery Model

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

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

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

Following the assessment, the advisory process continues, focused on enabling the bipartite committee to address issues that are listed in the improvement plan. The improvement plan includes issues that the factory has self-diagnosed and those that were identified during the Better Work assessment. Factories will be supported through tailored factory visits; issue specific seminars (on topics relevant to the country/industry) with peers from other factories; and training appropriate to the factory's specific needs. Better Work reporting has two elements - reports completed and verified by the Better Work program and those that are completed and released directly by factories. The Better Work factory reports consist of the assessment report that is released roughly 30 days after the unannounced assessment visit. Then later on in the cycle, in the 11th month of the cycle, Better Work then publishes a progress report, detailing improvements on compliance issues, as well as in-factory dialogue, continuous learning and the use of effective management systems. Better Work also provides additional recommendations in this report to further strengthen the improvement process. Factories report through

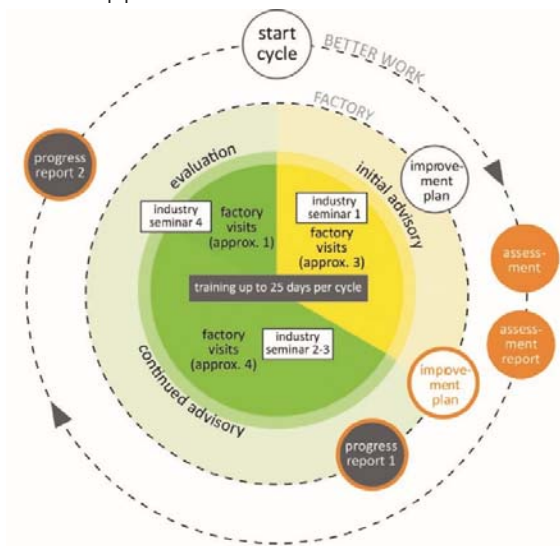


the Better Work portal. This portal is the platform that is also used by Better Work to share factory data with authorized international brands that subscribed to a specific factory in either of the Better Work country programs. The enhanced portal with the revised self-reporting function also offers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

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

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

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



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



---

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



---

## Annex 3. The Better Work Compliance Assessment Methodology

### BETTER WORK COMPLIANCE ASSESSMENT FRAMEWORK

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

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

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



Table 2: Better Work compliance assessment framework

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

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



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



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





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



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



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



## CALCULATING NON-COMPLIANCE & PUBLIC REPORTING

In public synthesis reports, Better Work reports on aggregated non-compliance in the participating industry as shown in Chart 1. Non-compliance is reported for each subcategory (compliance point, or “CP”) of the eight labor standards clusters. A factory is reported as non-compliant in a subcategory if it is found to be out of compliance on any issue addressed within the subcategory. With respect to the figures presented in synthesis reports, for example, a non-compliance rate of 100% means that all participating factories were found to have at least one violation in that area.

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

## LIMITATIONS IN THE ASSESSMENT PROCESS

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

Worker interviews conducted during the assessment process are held onsite, either in a private room within the factory building or outside the building (yard, eating area), and take place either in small groups or individually. Interviews are conducted in Creole, the primary language of the workers. Workers may be suspicious and feel uneasy about sharing information on their workplaces with people who are not well known to them and coaching of workers by factory management is a possible issue in the industry in general. Nevertheless, after fourteen assessment cycles conducted over more than seven years, Better Work Haiti Enterprise Advisors have

---

<sup>3</sup> Better Work Haiti Compliance Assessment Tool (CAT) including their legal references can be accessed here: [http://betterwork.org/haiti/?page\\_id=1731](http://betterwork.org/haiti/?page_id=1731)



become more experienced at collecting information and interviewing workers, which together with other activities led by Better Work Haiti have contributed in creating an environment where workers are more comfortable discussing working conditions. Interviews with workers cover many aspects of life at work and last approximately 20 minutes. On average, 40 workers representing different sections of the factories, as well as union representatives, are interviewed.

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

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

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

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



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

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



## Annex 4: Factories in Detail

### List of Factories

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

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

	Name of factory
1	Caribbean Island Apparel S.A.
2	Cleveland
3	CODEVI
4	Fairway Apparel S.A.
5	Go Haiti S.A.
6	H4H (has only been assessed once)
7	Hansae
8	Haiti Premier Apparel S.A.
9	H&H Textiles S.A.
10	Horizon Manufacturing S.A.
11	Interamerican Wovens S.A.
12	Interamerican Wovens - APH S.A.
13	Life S.A.
14	Mas Akansyel (has only been assessed once)
15	Modas BU IL Haiti S.A.
16	MGA Haiti S.A.
17	Pacific Sports Haiti S.A.
18	Palm Apparel S.A.



19	Premium Apparel S.A.
20	Quality Sewing MFG. S.A.
21	Sewing International S.A.
22	S&H Global S.A.
23	The Willbes Haitian II S.A.
24	The Willbes Haitian III S.A.
25	Val D'Or Apparel MFG Haiti S.A.

## Findings from the Factories

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

Better Work measures compliance with international core labor standards and national labor laws in a set of 8 clusters during its unannounced annual assessment visits. Under each cluster, several compliance points are assessed and each compliance point consists of individual issues that are verified during each Better Work compliance assessment. The list of compliance clusters, compliance points and issues can be found in the reference table in annex 3. The issues under each compliance point again usually break down into several questions. The full list of all questions of the compliance assessment tool (CAT) used by Better Work Haiti can be accessed online<sup>4</sup>. When a compliance point is not listed, it means that the factory has been in compliance on this point in both of its last two assessments by Better Work. The reference point is always the full list of compliance points and issues listed in annex 3. A factory needs to have been assessed at least two times before its information will be published in a factory table in this report. The columns in the tables correspond to specific reporting requirements of the HOPE legislation and provide additional information as follows:

<sup>4</sup> [http://betterwork.org/haiti/?page\\_id=1731](http://betterwork.org/haiti/?page_id=1731)





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

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

**BETTER WORK HAITI - 16TH SYNTHESIS REPORT**



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

Advisory and Training Services

31/01/2018 OSH committee meeting to conduct the OSH self-diagnosis. Factory tour. Review of the latest assessment report with the HR & Compliance manager to determine remediation actions.  
 05/04/2018 PICC meeting. Review of the improvement Plan. Review of documentation related to the compensation and break for pregnant women. Factory tour.

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDIATION EFFORTS	MONTHS
<b>Assessment January 2018</b>						
Jan-18	Occupational Safety and Health	Worker Protection	Missing machine guards.	Install all missing machine guards and ensure that they are properly maintained.		34
Jan-18	Occupational Safety and Health	Worker Protection	Electrical installations not properly maintained.	Ensure that electrical installations are properly maintained.		3
Jan-18	Occupational Safety and Health	Working Environment	Workplace temperature exceeded recommended limits.	Reduce workplace temperature.		66
Jan-18	Occupational Safety and Health	OSH Management Systems	OSH policy has not been developed in consultation with workers and their representatives and does not refer to compliance with labor law requirements pertaining to OSH.	Review OSH policy with workers representatives and include compliance with labor law requirements pertaining to OSH.		3
Jan-18	Occupational Safety and Health	Chemicals and Hazardous Substances	No updated inventory is available for some chemicals and hazardous substances used in the workplace.	Maintain an updated inventory for all chemicals and hazardous substances used in the workplace.	Management keep an updated inventory management system of chemicals and hazardous substances	3
Jan-18	Occupational Safety and Health	Working Environment	Insufficient light levels in the workplace.	Improve the lighting level in the workplace.		3
Jan-18	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets.	Increase the number of toilets and maintain the existing ones.		58
Jan-18	Occupational Safety and Health	Health Services and First Aid	The factory does not provide workers health checks within the first three months of hiring.	Provide workers health checks within the first three months of hiring.	OFATMA has started medical checks at the factory.	3

Jan-18	Occupational Safety and Health	Health Services and First Aid	The factory does not provide workers with annual health checks.	Provide workers with annual health checks.	OFATMA has started medical checks at the factory.	3
Jan-18	Occupational Safety and Health	Health Services and First Aid	The factory does not properly address safety and health risks to pregnant workers.	Address safety and health risks to pregnant workers by providing required breaks.	Breaks are now being offered to pregnant workers. Supervisors signed to respect this rule.	3
Jan-18	Occupational Safety and Health	Health Services and First Aid	Insufficient medical staff.	Hire additional medical staff.		16
Jan-18	Occupational Safety and Health	Health Services and First Aid	Less than 10 percent of the workforce trained in first aid.	Train at least 10 percent of the workforce in first aid.		3
Jan-18	Occupational Safety and Health	Emergency Preparedness	The current evacuation plans in one building has not been updated to indicate the actual escape routes according to the recently reorganized floor layout.	Update all evacuation plan to reflect the current layout of the workplace.		3
Jan-18	Occupational Safety and Health	Emergency Preparedness	Flammable materials such as fabrics were stored close to the lighting lamps in a small warehouse.	Ensure that flammable materials are stored safely.		3
Jan-18	Occupational Safety and Health	Chemicals and Hazardous Substances	Unidentified bottles of chemicals and hazardous substances were found in the workplace.	Label all containers of chemicals and hazardous substances.		3
Jan-18	Occupational Safety and Health	Chemicals and Hazardous Substances	Missing MSDS in areas where chemicals and hazardous substances are used or stored.	Display MSDS for all chemicals and hazardous substances.	MSDS have been posted in the workplace.	3
Jan-18	Occupational Safety and Health	Chemicals and Hazardous Substances	No eye wash station available for chemicals stored in the spare parts department.	Install eye wash station in the spare parts department.		3
<b>Assessment December 2016</b>						
Dec-16	Compensation	Paid Leave	Payments for legally mandated holidays are inaccurate for piece rate workers.	Ensure that the compensation for legally mandated holidays are accurate.	Factory compensated legally mandated holidays on the basis of average earnings.	22
Dec-16	Compensation	Paid Leave	Payments for sick leave are inaccurate for piece rate workers.	Ensure that sick leave payments are accurate.	Factory compensated legally mandated holidays on the basis of average earnings.	22
Dec-16	Compensation	Paid Leave	Payments for maternity leave are inaccurate for piece rate workers.	Ensure that maternity leave payments are accurate.	Factory compensated legally mandated holidays on the basis of average earnings.	22

Dec-16	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	The factory has not registered with OFATMA for maternity and health insurance services.	The factory should register with OFATMA for maternity and health insurance services.	The factory has started to collect the workers' files to initiate the registration process with OFATMA.	22
Dec-16	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	The factory has not registered with OFATMA for maternity and health insurance services.	The factory should register with OFATMA for maternity and health insurance services.	The factory has registered with OFATMA and is in the process of collecting and forwarding payments for insurance services.	22
Dec-16	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	The factory has an insufficient number of onsite medical staff.	Hire more onsite medical staff in order to comply with the Haitian Labour Code.	The factory had 9 nurses. One nurse has already been hired and the factory is in process to hire 2 more.	10
Dec-16	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	The factory does not have an adequate number of toilets for the workers.	Provide an adequate number of toilets in proportion to the total workforce as stipulated by the Haitian Labour code.		52
Dec-16	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	No pulley guards were installed on the factory's old Union Special sewing machines and the single needle machines.	Install and maintain proper guards on all the dangerous moving parts of machines and equipment.	The factory has ordered new machines and is in the process of installing pulley guards on the single needle machines.	28
Dec-16	<b>Occupational Safety and Health</b>	<b>Working Environment</b>	Temperatures of over 30 C have been recorded in some of the sections within the workplace.	Ensure that temperature and ventilation levels at the workplace are maintained properly.	Additional fans have been added throughout the workplace and during an advisory session, the temperature levels were also verified to be within the recommended limits (around 27-28 C).	60

**BETTER WORK HAITI - 16TH SYNTHESIS REPORT**



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

Advisory and Training Services

14-Mar-18 Review of Improvement plan and the progress report. Discussions on the training plan. Factory tour.

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDATION EFFORTS	MONTHS
<b>Assessment April 2018</b>						
Jan-18	Working Time	Paid Leave	Payments for non-working holidays are based on the minimum wage instead of average earnings.	Ensure non-working holidays' payments are based on average earnings.		14
Jan-18	Working Time	Paid Leave	Payments for weekly rest days are based on the minimum wage instead of average earnings.	Ensure Weekly rest days' payments are based on average earnings.		14
Jan-18	Compensation	Social Security and Other Benefits	Employer contribution to ONA is less than 6 percent of workers' base salaries.	Forward employer contribution to ONA based on base salary.		14
Jan-18	Compensation	Social Security and Other Benefits	Collecting and forwarding workers' contributions for social insurance funds to ONA.	Collect and forward workers' contribution to ONA based on base salary.		14
Jan-18	Compensation	Social Security and Other Benefits	The last payment for OFATMA work-related accident insurance was done for the previous fiscal year.	Register with OFATMA work related accident for the fiscal year.		14
Jan-18	Compensation	Social Security and Other Benefits	The factory has not yet registered with OFATMA for maternity and health insurance.	Register with OFATMA for maternity and health insurance services.		14
Jan-18	Compensation	Social Security and Other Benefits	Collecting and forwarding of workers' contributions to OFATMA for maternity and health insurance.	Register with OFATMA. Collect and forward workers' contributions to OFATMA for maternity and health insurance services.		14
Jan-18	Compensation	Wage Information, Use and Deduction	Time records of hours worked on Sundays are not entered in the payroll and are paid separately.	Ensure that hours worked on Sundays are registered in the payroll.		2

Jan-18	<b>Contract and Human Resources</b>	<b>Employment Contracts</b>	The contracts issued in 2017 did not specify the employee's position as required by law.	Include the required contents into the contracts.		2
Jan-18	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	Chemicals and hazardous substances such as K7M used in the spot cleaning area are not properly labeled.	Label all chemicals.		14
Jan-18	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	Chemicals were not stored properly in the chemical room.	Have a designated area to store chemicals, and ensure that the storage area is properly ventilated.		14
Jan-18	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	No MSDSs were posted in the chemical room near the printing building where chemicals are stored.	Prepare and post MSDS where chemicals are used.		14
Jan-18	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	Management did not isolate the use of chemicals and did not install exhaust ventilation.	Ensure that workers are protected from the use of chemicals.		2
Jan-18	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	There were no eye wash stations in the chemical room, the mechanic room of building AGC as well as in the generator room where chemicals are stored.	Install eye wash station where chemicals are stored.		14
Jan-18	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	Management did not provide gloves and goggles for workers in the spot cleaning area using VLR remover.	Ensure that all PPE are available in the workplace.		14
Jan-18	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	Standing workers in the packing area near the cutting room were not provided with foot rests or shock absorbing mats.	Provide standing mats to the standing workers.		14
Jan-18	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	About 30 percent of all sewing machines in AGC and Medicon buildings were missing finger guards and pulley guards.	Install missing finger guards and pulley guards on the sewing machines.		14
Jan-18	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	Assessors observed 2 uncovered electrical boxes with exposed wires in the cafeteria.	Ensure that electrical panels are properly maintained.		2
Jan-18	<b>Occupational Safety and Health</b>	<b>Working Environment</b>	Workplace temperature exceeds BW recommended limit of 30 C.	Ensure that the temperature does not exceed the recommended limit.		14

Jan-18	Occupational Safety and Health	Working Environment	Workplace lighting insufficient.	Improve the Lux level in the workplace.	14
Jan-18	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets	Increase the number of toilets.	14
Jan-18	Occupational Safety and Health	Welfare Facilities	Soap was not available in the AGC building and workers complained about that.	Ensure that soap are available at all times.	2
Jan-18	Occupational Safety and Health	Health Services and First Aid	The factory did not show evidence of annual medical checks for workers.	Provide annual medical checks for workers.	14
Jan-18	Occupational Safety and Health	Health Services and First Aid	The factory did not provide health checks to workers who have been exposed to work-related hazards.	Provide health checks to workers who have been exposed to work-related hazards.	14
Jan-18	Occupational Safety and Health	Health Services and First Aid	The factory does not provide workers health checks within the first three months of hiring.	Provide workers health checks within the first three months of hiring.	14
Jan-18	Occupational Safety and Health	Health Services and First Aid	Insufficient medical staff	Increase the number of medical staff in the workplace.	14
Jan-18	Occupational Safety and Health	Health Services and First Aid	Workers trained in first aid represent less than 10 percent of the workforce	Provide training to at least 10 percent of the workforce in First-aid.	14
Jan-18	Occupational Safety and Health	Emergency Preparedness	Access to 1 alarm system was obstructed by boxes in the cutting building. Furthermore, the alarm system in the printing building is not working.	Ensure that the workplace has a functioning alarm system.	2
Jan-18	Occupational Safety and Health	Emergency Preparedness	Fire extinguishers not easily accessible.	Ensure that access to fire extinguishers remain unobstructed in the workplace.	14
Jan-18	Occupational Safety and Health	Emergency Preparedness	Workers trained in firefighting equipment represent less than 10 percent of the workforce.	Train at least 10 percent of the workforce in firefighting equipment.	14
Jan-18	Occupational Safety and Health	Emergency Preparedness	The current evacuation plans in the cutting and fabric warehouse buildings have not been updated to indicate the actual escape routes according to the recently reorganized floor layout.	Update the current evacuation plan.	2
Jan-18	Occupational Safety and Health	Emergency Preparedness	Emergency drills were not conducted every 6 months.	Conduct 2 emergency drill per year as recommended by BW.	2

Jan-18	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	Sources of ignition not properly safeguarded.	Ensure that sources of ignition are safeguarded		2
Jan-18	<b>Working Time</b>	<b>Leave</b>	Breastfeeding break is not systematically granted.	Provide Breastfeeding break to all eligible workers.		2
Jan-18	<b>Occupational Safety and Health</b>	<b>OSH Management Systems</b>	The OSH policy does not refer to compliance with labor law requirements pertaining to OSH.	Develop an OSH policy.		2
<b>Assessment January 2017</b>						
Jan-17	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	The calculation of the ONA deductions are based on a 5-day work week instead of the base salary.	Ensure that ONA payments are based on the base salary.		
Jan-17	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	The ONA payments are not made on time.	Ensure that the ONA payments are accurate and submitted on time.		
Jan-17	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	The factory is not registered with OFATMA for work-related accidents for the 2016-2017 fiscal year.	Register with OFATMA for work-related accidents.	Employees are registered and payment is effective.	
Jan-17	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	The factory is not registered with OFATMA for maternity and health insurance services (workers' contributions).	Register with OFATMA for maternity and health insurance services.		
Jan-17	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	The factory has not yet registered with OFATMA for maternity and health insurance services (employer's contributions).	Register with OFATMA for maternity and health insurance services.		
Jan-17	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	Unlabeled chemical containers were found in the workplace	Ensure that all containers are identified and safely stored. Establish a procedure for proper chemical management	The containers were labeled during the assessment visit.	
Jan-17	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	No MSDS' were posted for chemicals used in the ink mixing area.	Provide MSDS' for all the hazardous chemicals used in the workplace.		
Jan-17	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	Documented evidence of actions taken by management to control and oversee workers' exposure to chemicals and hazardous substances were unavailable.	Keep records of action taken to control and oversee workers' exposure to chemicals and hazardous substances.		
Jan-17	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	Proof of chemical safety training conducted for workers were unavailable during the assessment.	Keep records of chemical safety training sessions conducted for workers.		



Jan-17	Occupational Safety and Health	Chemicals and Hazardous Substances	No eye washing facilities were provided for workers exposed to hazardous chemicals in the printing section.	Provide adequate washing facilities and cleansing materials in the event of exposure to hazardous chemicals.	The factory installed additional eye wash stations in areas where workers are exposed to chemicals.	
Jan-17	Occupational Safety and Health	Worker Protection	No protective equipment were provided to workers in the generator room where there is a high level of noise and in the spot cleaning area on the sewing floor.	Provide workers with all the necessary personal protective clothing and equipment.		
Jan-17	Occupational Safety and Health	Worker Protection	PPE training records were unavailable.	Keep record of PPE training sessions conducted for workers.	The factory provided training to workers while giving the PPE. Workers signed that they received the training and the PPE.	
Jan-17	Occupational Safety and Health	Worker Protection	Shock absorbing mats were not provided for several standing workers in the inspection area.	Provide shock absorbing mats for standing workers.		
Jan-17	Occupational Safety and Health	Worker Protection	More than 30 percent of all machines were missing pulley guards. All the single needle machines were missing finger guards.	Install guards on all dangerous moving parts of machines and equipment.	Monthly inventory is performed since then and guards are installed progressively.	
Jan-17	Occupational Safety and Health	Worker Protection	The electrical distribution boxes were not well maintained as 3 boxes were left uncovered and 2 boxes were obstructed. In the printing area, welding work was being conducted with exposed wires.	Ensure that all electrical wires, switches and plugs are properly installed, grounded and maintained.	All electrical wires, switches and plugs are properly installed, grounded and maintained.	
Jan-17	Occupational Safety and Health	Working Environment	Temperatures throughout the factory exceed the BW recommended maximum limit of 30 C.	Keep the workplace temperature under 30 C.	The factory has ordered a measuring tool to monitor the temperature level and take decisions accordingly.	
Jan-17	Occupational Safety and Health	Working Environment	Several sections at the workplace were inadequately lit.	Lighting levels should be increased.	The factory has ordered a measuring tool to monitor the light level and take decisions accordingly.	
Jan-17	Occupational Safety and Health	Welfare Facilities	The factory has 17 functioning toilets for women and 15 toilets for men. With its current workforce, the factory should have 19 functioning toilets for men and 66 functioning toilets for women.	Comply with the labor code recommendations regarding the total number of toilets.		
Jan-17	Occupational Safety and Health	Health Services and First Aid	No systematic medical checks were arranged for newly hired workers within the first three months of employment.	Provide medical checks to workers within the first three months of hiring.		

Jan-17	Occupational Safety and Health	Health Services and First Aid	No systematic medical checks were arranged for workers who have been exposed to work-related hazards.	Provide systematic medical checks to workers exposed to work-related hazards.		
Jan-17	Occupational Safety and Health	Health Services and First Aid	No systematic annual medical checks were arranged for workers.	Provide systematic annual medical checks for all workers.		
Jan-17	Occupational Safety and Health	Health Services and First Aid	The factory has 2 full time nurses and 1 doctor's visit per week.	To comply with the Haitian labour code, a factory of this size must have a permanent on site medical service, with at least 7 nurses and 3 doctor's visits per week.	The factory is building a new infirmary and one onsite doctor will perform general medical checks for 2 or 3 days a week.	
Jan-17	Occupational Safety and Health	Health Services and First Aid	Only 33 workers were trained in first-aid.	To comply with the Haitian Labour Code, a factory of this size must have at least 144 workers trained in first-aid.		
Jan-17	Occupational Safety and Health	Emergency Preparedness	The alarm system is not working in the printing area and the fabric warehouse. The obstructed smoke detector in cutting area was corrected during the assessment.	Ensure the workplace has adequately functioning fire detection and alarm systems.		
Jan-17	Occupational Safety and Health	Emergency Preparedness	6 fire extinguishers were inspected in 2014 and did not have any maintenance logs attached. Another fire extinguisher had inadequate pressure. The 6 fire extinguishers from 2014 were removed during the assessment.	Maintain adequately functioning fire-fighting equipment.	Non functional fire extinguishers were removed and repaired.	
Jan-17	Occupational Safety and Health	Emergency Preparedness	Only 63 workers were trained in fire fighting.	A factory of this size must have at least 144 workers trained in fire-fighting.	Twice a year a group of employees are trained. Past months, the National Fire Brigade has trained 25-30 employees. At the end of the year, another group will be trained.	
Jan-17	Occupational Safety and Health	Emergency Preparedness	No evacuation maps were posted in the printing area and the fabric warehouse. The evacuation map posted in the inspection and pressing areas need to be updated.	Post accurate evacuation maps around the workplace.	Engineering department has submitted a draft of the evacuation plan for approval.	
Jan-17	Occupational Safety and Health	Emergency Preparedness	2 out of the 3 exits on the printing floor were obstructed and the exit lights were not working. Another exit on the cutting floor was obstructed by a car.	Ensure that the emergency exits are accessible, unobstructed and unlocked during working hours, including overtime.	Emergency exits are accessible.	

Jan-17	<b>Working Time</b>	<b>Regular Hours</b>	Authorization from the Department of Labour before working at night	Request the authorization to work at night from MAST.	Situation is regularized. The factory requests for authorization to work at night if they scheduled so and they do not perform the overtime without the authorization.	
Jan-17	<b>Working Time</b>	<b>Overtime</b>	Workers had worked more than 80 hours of overtime during the May to July 2016 trimester.	Comply with the Haitian labor code on overtime work.	The factory limits the number of overtime hours.	
Jan-17	<b>Working Time</b>	<b>Overtime</b>	An authorization to work overtime during November 2016 to January 2017 was not obtained from the Department of Labour.	Obtain prior authorization from MAST for overtime work.	The factory requested the required authorization.	

**BETTER WORK HAITI - 16TH SYNTHESIS REPORT**



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

**Advisory and Training Services**

28-Oct-17 Emergency Preparedness & Accident Investigation Training  
 8-Nov-17 Improvement plan review with compliance team. Validation of remediation of issues with compliance team (HR and compensation).  
 9-Nov-17 Validation of issues remediation with compliance team (OSH Tour). PICC Meeting to Welcome Brand M members and update Self diagnosis.  
 8 & 9- Nov-17 Human Resources management training  
 20-Feb-18 Review of improvements with compliance team. Union meeting SOFEZO and SOKOWA/  
 Union meeting UTRACO and SYNTRAC.  
 21-Feb-18 Factory Tour for new facilities (CIH, Everbright). PICC Meetings with Brand M & FW1 to update the improvement plan.  
 14-Mar-18 Supervisory Skills Training (SST)  
 19-Mar-18 Negotiation Skills Training

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDATION EFFORTS	MONTHS
<b>Assessment April 2018</b>						
Jan-18	Compensation	Overtime Wages	Several workers categorized as apprentices were subjected to overtime hours but receive only the apprentice salary, which is 40% of the minimum wage with no compensation for the overtime hours worked.	Ensure that apprentices are properly paid for all hours worked.		18
Jan-18	Compensation	Method of Payment	Wage deduction should not exceed 1/6 of workers monthly earnings.	Ensure that salary deductions do not exceed 1/6 of workers earnings.		3
Jan-18	Compensation	Paid Leave	Permanent workers were not compensated for Sunday after 6 consecutive days or 48 hours worked.	Ensure that workers are compensated in line with the legal requirements.		78
Jan-18	Compensation	Paid Leave	Annual leave payment is incorrect.	Ensure that annual leave calculations include all the workers' earnings.		18

Jan-18	<b>Compensation</b>	<b>Paid Leave</b>	Sick leave payment is incorrect.	Ensure that sick leave payments are based on average workers' earnings.	78
Jan-18	<b>Compensation</b>	<b>Paid Leave</b>	Maternity leave payment is incorrect.	Ensure that maternity leave payments are based on average workers' earnings	78
Jan-18	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	Employer contribution to ONA was not paid on time.	Ensure that ONA payments are accurate and on time for all buildings	18
Jan-18	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	Workers' contribution to ONA was not paid on time.	Ensure that ONA payments are accurate and on time for all buildings	18
Jan-18	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	OFATMA payment for work-related accident insurance was not made for the fiscal year 2017-2018.	Pay the work related accident insurance for the fiscal year 2017-2018	78
Jan-18	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	The factory has not registered with OFATMA for maternity and health insurance.	Register with OFATMA for maternity and health insurance	30
Jan-18	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	The factory has not registered with OFATMA for maternity and health insurance.	Register with OFATMA for maternity and health insurance	30
Jan-18	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	The payment amount for the annual bonus is incorrect.	Ensure that the annual bonus calculation is based on total workers earnings	18
Jan-18	<b>Contract and Human Resources</b>	<b>Employment Contracts</b>	Apprentices were found to have contracts that are not approved by MAST as required by law.	Ensure that the apprenticeship program is approved by MAST	18
Jan-18	<b>Contract and Human Resources</b>	<b>Employment Contracts</b>	The internal work rules are not yet approved by the Ministry of Social Affairs and Labour.	Follow up with MAST for the approval of internal work rules.	18
Jan-18	<b>Occupational Safety and Health</b>	<b>OSH Management Systems</b>	Assessment of general occupational safety and health issues was not completed in all facilities.	Conduct a general occupational safety and health assessment for all buildings.	3
Jan-18	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	No inventory of chemical substances used in the workplace were provided for three facilities.	Keep an accurate and updated inventory for all chemicals used in the workplace.	18

Jan-18	Occupational Safety and Health	Chemicals and Hazardous Substances	Some chemicals containers did not have any kind of labeling or the labeling was in a foreign language.	Ensure that all chemicals are properly labeled. Train workers and managers on proper chemical handling.	90
Jan-18	Occupational Safety and Health	Chemicals and Hazardous Substances	Chemical storage area has not been properly built in one of the factories.	Ensure that all chemicals are properly stored. Train workers and managers on proper chemical handling.	90
Jan-18	Occupational Safety and Health	Chemicals and Hazardous Substances	During the assessment it was observed that no MSDS were available for several chemicals substances used in the workplace.	Ensure that all required MSDS are available in local language for all chemicals used in the workplace. Train workers and managers on proper chemical handling.	90
Jan-18	Occupational Safety and Health	Chemicals and Hazardous Substances	During the assessment it was observed that no eyewash stations were installed in 6 locations where chemicals are used.	Install proper eye wash stations in all areas where chemicals are used in the workplace.	90
Jan-18	Occupational Safety and Health	Worker Protection	During the assessment it was observed that PPE were not provided to all workers exposed to hazards.	Ensure that workers are provided with all required PPEs. Provide PPE training as required.	90
Jan-18	Occupational Safety and Health	Worker Protection	Workers' chairs were found in poor conditions in four facilities.	Provide workers with chairs with backrest.	90
Jan-18	Occupational Safety and Health	Worker Protection	Machine safety guards were missing.	Ensure that all machines and equipment are equipped with the required safety guards.	90
Jan-18	Occupational Safety and Health	Worker Protection	Exposed electrical wires and open electrical boxes with exposed wires in three facilities.	Ensure that all electrical installation are properly maintained.	3
Jan-18	Occupational Safety and Health	Worker Protection	Electrical installation not properly marked.	Ensure that all electrical installation are properly maintained and identified.	3
Jan-18	Occupational Safety and Health	Working Environment	Temperature levels exceeded 30 C.	Keep the workplace temperature below 30 C.	30
Jan-18	Occupational Safety and Health	Working Environment	Noise levels exceeded 90 Db.	Keep the workplace noise level below 90 Db.	3

Jan-18	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets.	Increase the number of toilets.		90
Jan-18	Occupational Safety and Health	Welfare Facilities	Missing soap in toilets.	Ensure that soap is always available during working hours.		90
Jan-18	Occupational Safety and Health	Welfare Facilities	Insufficient seating in eating area.	Build additional eating area for workers.		90
Jan-18	Occupational Safety and Health	Health Services and First Aid	No medical checks for workers exposed to work-related hazards were provided for workers in 3 facilities.	Provide free medical health checks for workers at BKL, Top Choice and Superior within the first three months of hiring.		90
Jan-18	Occupational Safety and Health	Health Services and First Aid	No medical checks at hiring were provided for workers in 3 facilities.	Provide free annual checks for all workers exposed to work-related hazards twice a year in all factories.		90
Jan-18	Occupational Safety and Health	Health Services and First Aid	No evidence of annual medical checks for all workers was presented.	Provide free annual checks for all workers once a year in all factories.		90
Jan-18	Occupational Safety and Health	Health Services and First Aid	Insufficient medical staff.	Increase the number of nurses.		90
Jan-18	Occupational Safety and Health	Health Services and First Aid	First aid boxes not properly equipped in some locations.	Ensure that first aid boxes are available and properly supplied in all factories.		90
Jan-18	Occupational Safety and Health	Health Services and First Aid	Insufficient number of workers trained in first aid.	Train at least 10 percent of workforce in first aid.		90
Jan-18	Occupational Safety and Health	Emergency Preparedness	No fire detectors have been installed in 3 areas and no smoke detector were installed in three others.	Install adequate fire extinguishers and smoke detectors as required in all buildings.		18
Jan-18	Occupational Safety and Health	Emergency Preparedness	Fire extinguishers not properly maintained.	Keep all fire extinguishers properly maintained.		18
Jan-18	Occupational Safety and Health	Emergency Preparedness	Insufficient number of workers trained in fire fighting.	Train 10 percent of the workforce to use the fire-fighting equipment.		90
Jan-18	Occupational Safety and Health	Emergency Preparedness	Escape routes not properly marked in two buildings.	Mark the escape routes in all buildings.		90

Jan-18	Occupational Safety and Health	Emergency Preparedness	Emergency routes and/or exits obstructed or not clearly marked in five out of seven buildings.	Keep the aisles clear in all buildings.		90
Jan-18	Occupational Safety and Health	Emergency Preparedness	Emergency drills not conducted every 6 months in all buildings.	Conduct emergency drills for all buildings.		90
Jan-18	Occupational Safety and Health	Emergency Preparedness	Cell phones were being charged inappropriately throughout the workplace near highly flammable substances.	Keep all possible sources of ignition safeguarded. Provide workers with cell phone charging station.		18
Jan-18	Working Time	Regular Hours	Not all hours worked on Saturday are reflected in the attendance records.	Ensure that all working hours are properly recorded and compensated.		18
Jan-18	Working Time	Overtime	Workers in the packing, shipping and loading session were found to have completed up to 215 hours overtime per trimester.	Reduce the number of overtime hours.		78
<b>Assessment April 2016</b>						
Oct-16	Discrimination	Gender	One case of sexual harassment has been found in the workplace.	Provide training to raise workers awareness on ways to prevent and address sexual harassment at the workplace. Train supervisors and managers on the company regulations regarding sexual harassment. Update the policy on sexual harassment to include mandatory training for workers and managers and strengthen reporting options and investigation processes.	The factory has included information on their sexual harassment policy in the induction training for all new workers. Training has also been provided to old workers.	
Oct-16	Freedom of Association and Collective Bargaining	Collective Bargaining	The CBA is not fully implemented.	Review the CBA with the union and implement all the provisions agreed upon accordingly.	A new CBA is being negotiated.	
Oct-16	Compensation	Overtime Wages	Extra hours of work performed on Saturday and Sunday are not adequately paid.	Ensure that work on weekly rest days are conducted with prior authorization from MAST and compensated properly.		



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

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

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

Oct-16	Occupational Safety and Health	Worker Protection	Not all workers in the following sections were provided with PPE : spot cleaning section, stamping, and production.	Provide adequate PPE to all worker, as required and train them on the importance of using PPE. Assign a person in charge of monitoring the availability of PPEs.	Additional PPEs were provided in the MD and AM2 buildings. Training on chemical handling was provided. Maintenance coordinators have been tasked with monitoring the availability of PPEs.	
Oct-16	Occupational Safety and Health	Worker Protection	Several workers were seated on chairs without back rests. Also several standing workers in one building were not provided with standing mats. Several pregnant workers in another building were performing tasks that required them to stand for extended periods and were not provided with chairs when requested.	Replace the chairs without back rests.	Management has purchased new chairs to replace the ones without back rests. New chairs are provided to workers as needed.	
Oct-16	Occupational Safety and Health	Worker Protection	During the factory tour, EAs noticed that several machines were missing finger guards and pulley guards.	Define staff in charge of maintaining machine guards for each factory. Ensure that all machines have proper guards.	Machine guards were replaced and the maintenance coordinators have been assigned to monitor this requirement.	
Oct-16	Occupational Safety and Health	Worker Protection	No warning signs were posted on several electrical boxes.	Ensure that Top Choice and Superior assigns a management staff to be in charge of monitoring compliance issues.		
Oct-16	Occupational Safety and Health	Working Environment	Workplace temperature exceed 30 C.	Improve the temperature levels in the noted areas.	The factory installed a cooling system in AM2 and Mazava. They also added more fans and heat extractors in FW1 and MD. They plan to add cooling systems in FW1 in October 2017 and in MD, in December 2017.	
Oct-16	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets.	Build additional toilets.		
Oct-16	Occupational Safety and Health	Welfare Facilities	Lack of soap in the restrooms.	Assign a person in charge of monitoring the availability of soap in all toilets.		
Oct-16	Occupational Safety and Health	Welfare Facilities	The number of seats available at the existing eating area is inadequate to accommodate the total number of workers currently employed by the factory.	Provide an eating area that can adequately accommodate all workers.		

Oct-16	Occupational Safety and Health	Health Services and First Aid	No systematic medical checks were arranged for newly hired workers within the first three months of employment.	Conduct regular medical checks for newly hired workers.	The factory conducts regular medical checks for newly hired workers on an ongoing basis.	
Oct-16	Occupational Safety and Health	Premium Pay	No adequate compensation is provided for work performed on both Saturday and Sunday.	Properly compensate workers for hours worked at night.		
Oct-16	Occupational Safety and Health	Health Services and First Aid	No systematic annual medical checks were arranged for workers.	Provide systematic annual medical checks for all workers.		
Oct-16	Occupational Safety and Health	Health Services and First Aid	No systematic bi-annual medical checks were arranged for workers who are exposed to work related hazards.	Provide systematic bi-annual medical checks were arranged for workers who are exposed to work related hazards.		
Oct-16	Occupational Safety and Health	Health Services and First Aid	Several pregnant workers complained that they were not provided with seats when requested.	Ensure that all pregnant women are provided with proper seats.	Additional chairs were provided for pregnant women.	
Oct-16	Occupational Safety and Health	Health Services and First Aid	Insufficient number of medical staff	Hire additional medical staff.		
Oct-16	Occupational Safety and Health	Health Services and First Aid	First aid boxes not easily accessible in 3 buildings.	Ensure that adequate first aid boxes are available in each building.		
Oct-16	Occupational Safety and Health	Emergency Preparedness	Two factories did not have an alarm system installed and the alarm system from another building was not operational.	Install proper fire detection and alarm system in all buildings.	The factory recruited one additional compliance officer to improve monitoring of the new plants.	
Oct-16	Occupational Safety and Health	Emergency Preparedness	Several undercharged or blocked fire extinguishers found in the workplace.	Increase the number of fire extinguishers inspection in all building. Keep a stock of additional fire extinguishers to be used in case of emergency.	The factory recruited one additional compliance officer to improve monitoring of the new plants.	
Oct-16	Occupational Safety and Health	Emergency Preparedness	The evacuation plans do not reflect the actual layout of the workplace for 2 building. No evacuation were posted in the workplace for 1 building.	Update all evacuation plan as required.		
Oct-16	Occupational Safety and Health	Emergency Preparedness	No records of fire drills were available for 3 buildings.	Conduct biannual emergency drills for each building.	The factory conducted emergency drills in all the buildings.	

Oct-16	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	Cell phones were being charged inappropriately throughout the workplace and near highly flammable substances.	Provided workers with a designated charging stations.	Management provided workers with charging stations in order to address this issue.	
Oct-16	<b>Working Time</b>	<b>Regular Hours</b>	Workers from several buildings complained that they usually worked beyond regular hours but receive a fixed salary from management regardless of the actual hours worked.	Review compensation system for all eligible workers to ensure that they are properly paid for overtime hours.		
Oct-16	<b>Working Time</b>	<b>Regular Hours</b>	Several categories of workers were not punching in and out of the factory to record their working time. Several of these workers explained that they are subjected to long working hours but are not	Review attendance recording system for all eligible workers to ensure that all overtime hours are properly recorded for them.		
Oct-16	<b>Working Time</b>	<b>Overtime</b>	No authorization to work at night was provided to EAs during the assessment.	Request authorization to work at night from MAST.	New regulation on working hours eliminated that requirement.	
Oct-16	<b>Working Time</b>	<b>Overtime</b>	Several workers in the packing, shipping and loading session at 2 plants were found to have completed more than 80 hours overtime per trimester.	Respect legal limits for overtime.	New regulation on working hours eliminated that requirement.	
Oct-16	<b>Working Time</b>	<b>Overtime</b>	No authorization to work on Sundays was provided to EAs during the assessment.	Request authorization to work on Sundays from MAST.	New regulation on working hours eliminated that requirement.	
Oct-16	<b>Working Time</b>	<b>Overtime</b>	No authorization to work overtime was provided to EAs during the assessment.	Request authorization to work overtime from MAST.	New regulation on working hours eliminated that requirement.	

**BETTER WORK HAITI - 16TH SYNTHESIS REPORT**



**Factory:** Fairway Apparel S.A.  
**Location:** Port-au-Prince  
**Number of workers:** 452  
**Date of BW registration :** Mar-16  
**Date of last two Better Work assessments:** Aug-17 Jun-16

**Advisory and Training Services**

15-Nov-17 Training on chemicals management.  
 24-Nov-17 Industrial Relations Training  
 08-Dec-17 Human Resources Management Training  
 02-Feb-18 Discussion on the improvement plan and strike protocol with the HR compliance officer. Factory tour to conduct Hazard hunt.  
 Discussion-PICC functioning-HR compliance officer  
 15-Mar-18 Follow up on the recommendations made in the strike dismissal report/social dialogue. Review of the improvement Plan.

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDIATION EFFORTS	MONTHS
<b>Assessment August 2017</b>						
Aug-17	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	The evacuation routes in the fabric warehouse were obstructed by boxes of finished goods and other materials.	Ensure the evacuation routes in the fabric warehouse remain unobstructed during working hours, including overtime.		24
Aug-17	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	Employer contribution to ONA. The last ONA payment was made for the month of May 2017 and the contribution is based on the minimum wage instead of the base salary.	Ensure that ONA payments are based on the basic salary instead of worker's minimum wages. Also, ONA payments must be made within 10 working days of the following month.		71
Aug-17	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	Collecting and forwarding workers' contributions for social insurance funds to ONA.	Ensure that ONA payments are based on the basic salary instead of workers' minimum wages.		71
Aug-17	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	Employer contribution to OFATMA for work-related accident insurance.	Ensure that the employer contribution to OFATMA for work-related accident insurance is 3 percent of workers' basic salary.		8
Aug-17	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	Employer contribution to OFATMA for maternity and health insurance.	Register with OFATMA for maternity and health insurance services.		8

Aug-17	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	Workers' contributions to OFATMA for maternity and health insurance.	Collect and forward of worker's contributions to OFATMA for maternity and health insurance.		8
Aug-17	<b>Contract and Human Resources</b>	<b>Contracting Procedures</b>	Excessive overtime for non production workers.	Ensure that non production workers do not exceed the legal limits for overtime hours.		8
Aug-17	<b>Occupational Safety and Health</b>	<b>OSH Management Systems</b>	Assessment of general occupational safety and health issues in the factory.	Set up an OSH committee and conduct a monthly assessment of general occupational health and safety in the factory.		8
Aug-17	<b>Occupational Safety and Health</b>	<b>OSH Management Systems</b>	Mechanisms to ensure cooperation between workers and management on OSH matters.	Ensure that the factory has an active OSH committee that meets at least once a month.		8
Aug-17	<b>Occupational Safety and Health</b>	<b>OSH Management Systems</b>	Written OSH policy signed by top management.	Update OSH policy in consultation with workers' representatives. Ensure that the policy is signed by top management.		8
Aug-17	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	Inventory of chemicals and hazardous substances used in the workplace does not include the amount of chemicals in storage.	Update the list of chemicals used and include the products in storage in the inventory of chemicals and hazardous substances.		8
Aug-17	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	Assessing, monitoring, preventing and/or limiting workers' exposure to hazardous substances.	Measure worker's exposure to hazardous substances.		8
Aug-17	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	Washing facilities or cleansing materials are not available in the event of chemical exposure.	Provide adequate washing facilities and cleansing materials in the event of exposure to hazardous chemicals.		8
Aug-17	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	Personal protective clothing and equipment not available for workers in the spot cleaning.	Replace damaged PPE and provide adequate equipment to workers using hazardous chemicals.		47
Aug-17	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	Workers are not using personal protective equipment installed on machines.	Train and encourage workers to properly use personal protective equipment and machines.		47
Aug-17	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	Missing guards on some dangerous parts of machines and equipment.	Install proper guards and maintain all dangerous parts of machines and equipment.		8
Aug-17	<b>Occupational Safety and Health</b>	<b>Working Environment</b>	Workplace temperature exceed BW recommended limit of 30 C.	Improve the temperature levels throughout the workplace.		65



Aug-17	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	The last drinking water test provided by the factory indicated that the water contained harmful germs.	Provide workers enough free safe drinking water.	The most recent water test completed revealed no harmful germs in the water.	8
Aug-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	No medical check for workers within the first three months of hiring.	Ensure medical checks are performed on all workers within the first three months of hiring.	The factory implemented a system to ensure that medical checks are provided for all new workers.	8
Aug-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	lack of Health checks for workers who are exposed to work-related hazards.	Provide bi-annual medical checks to workers who have been exposed to work related hazard		8
Aug-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	Annual medical checks for workers.	Ensure annual medical checks are provided to all workers.	The factory implemented a system to ensure that medical checks are provided for all new workers.	8
Aug-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	Access to one first aid box was completely obstructed by fabric cartons.	Ensure first aid boxes are accessible and remain unobstructed.	First aid boxes are unobstructed.	8
<b>Assessment June 2016</b>						
Jun-16	<b>Compensation</b>	<b>Overtime Wages</b>	Security guards' overtime payment is inaccurate.	Adjust the security guards' salary according to their working hours.	The factory adjusted the security guards' salary according to their working hours.	
Jun-16	<b>Compensation</b>	<b>Overtime Wages</b>	Security guards were not paid correctly for regular overtime hours.	Ensure that the security guards are paid properly.	The factory changed the security guards employment contracts.	
Jun-16	<b>Compensation</b>	<b>Overtime Wages</b>	Security guards were incorrectly paid for overtime hours worked at night as they received a fixed salary.	Ensure that the security guards' pay is compliant with the law.	Security cameras have been installed and the guards no longer work at night.	
Jun-16	<b>Compensation</b>	<b>Overtime Wages</b>	Security guards were not paid for overtime hours worked during legally mandated holidays as they received fixed salaries.	Ensure that the security guards' payments are compliant with legal requirements.	The security guards' payments are compliant with legal requirements.	
Jun-16	<b>Compensation</b>	<b>Overtime Wages</b>	Security guards were not paid for overtime hours worked during weekly rest days as they received fixed salaries.	Ensure that the security guards' payments are compliant with legal requirements.	The security guards' payments are compliant with legal requirements.	
Jun-16	<b>Compensation</b>	<b>Premium Pay</b>	Security guards were incorrectly paid for regular hours worked at night as there was no 50 percent increase for such payments	Ensure that the security guards' payments are compliant with legal requirements.	The security guards' payments are compliant with legal requirements.	
Jun-16	<b>Compensation</b>	<b>Premium Pay</b>	Security guards were incorrectly paid for regular hours worked during weekly rest days.	Ensure that the security guards' payments are compliant with legal requirements.	The security guards' payments are compliant with legal requirements.	

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

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

**BETTER WORK HAITI - 16TH SYNTHESIS REPORT**



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

Advisory and Training Services

20-Feb-18 Discussion on the training plan. Preparation of the election for the PICC.  
 16-Feb-18 Review the last assessment findings and the improvement plan. Assistance on the preparation of the Progress Report 1. Factory tour

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDIATION EFFORTS	MONTHS
<b>Assessment April 2017</b>						
Oct-17	Occupational Safety and Health	Working Environment	Workplace temperature exceed 30 C in the following areas: Packing section, Quality section, Sewing section, pressing section	Improve the temperature levels in the noted areas.		16
Oct-17	Occupational Safety and Health	Working Environment	Insufficient light levels.	Ensure the lighting is adequate and adapted to worker's needs.		5
Oct-17	Occupational Safety and Health	Welfare Facilities	The factory has 6 functional toilets for 77 men and 10 functional toilets for 187 Women.	Ensure that the factory has 12 functioning toilets for women.		16
Oct-17	Occupational Safety and Health	Health Services and First Aid	The factory has 1 nurse and 5 doctor's visits per week.	Ensure that the factory has a permanent onsite medical staff, with at least 2 nurses and 3 doctor's visits per week.		16
Oct-17	Occupational Safety and Health	Health Services and First Aid	First-aid training for workers.	Provide first-aid training for at least 10 percent of the total workforce.		5
Oct-17	Occupational Safety and Health	Emergency Preparedness	Training workers to use the firefighting equipment.	Provide training to at least 10 percent of the total workforce in the use of fire-fighting equipment.		5
Oct-17	Occupational Safety and Health	Emergency Preparedness	Periodic emergency drill	Ensure that workers participate to an emergency drill every six months.		5
Oct-17	Occupational Safety and Health	Emergency Preparedness	Direct wire connection to electrical outlets in the storage room next to the gas tank.	Ensure that possible sources of ignition appropriately safeguarded.		5

Oct-17	Compensation	Method of Payment	Wages payment not regularly paid on time.	Ensure regular and timely payment of wages every 15 days.		5
Oct-17	Compensation	Social Security and Other Benefits	Employer contribution to ONA is based on minimum wage.	Ensure that ONA payment is based on the basic salary instead of worker's minimum wages. Then, made the monthly payment within the first 10 working days of the following month.	Change has been done in the system and it will be effective in the next payroll.	5
Oct-17	Compensation	Social Security and Other Benefits	Workers' contributions to ONA is base on the minimum wage.	Ensure that ONA payment is based on the basic salary instead of worker's minimum wages.	Change has been done in the system and it will be effective in the next payroll.	5
Oct-17	Occupational Safety and Health	Worker Protection	Workers are not using the eye guards on their sewing machines.	Provide training to all workers and encourage them to use PPE, machines and equipment safely.	Training have been provided to the operators.	5
Oct-17	Occupational Safety and Health	Worker Protection	Single needle machines missing finger guards. Also the grinder in the mechanical room is missing a safety cover.	Install guards on all dangerous parts of machines and equipment.	Safety cover has been placed on the grinder.	5
<b>Assessment November 2016</b>						
Nov-16	Compensation	Social Security and Other Benefits	The factory did not register with OFATMA for maternity and health insurance (employer's contribution).	Register for the mandatory health and maternity insurance services from OFATMA.		
Nov-16	Occupational Safety and Health	Working Environment	The temperatures at the sewing and quality sections exceeded the BW recommended limit of 30 C.	Ensure that workplace temperatures are compliant in all sections.		
Nov-16	Occupational Safety and Health	Welfare Facilities	The factory has 9 toilets for men and 11 toilets for women. With its current workforce, the factory should have 15 for women.	Provide enough toilets in proportion to the number of workers in the factory, as required by the law. Keep existing toilets clean and properly maintained	The factory is planning to add mobile toilets to comply with this requirement.	
Nov-16	Occupational Safety and Health	Health Services and First Aid	The factory has only 1 on site nurse and 1 doctor.	To comply with the Haitian labor code, the factory should hire an additional nurse as a part of their on site medical team.		

Nov-16	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	The factory did not register with OFATMA for maternity and health insurance (workers' contribution).	Register for the mandatory health and maternity insurance services from OFATMA.		
--------	---------------------	---	--	---	--	--

**BETTER WORK HAITI - 16TH SYNTHESIS REPORT**



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

**Advisory and Training Activities**

06-Oct-17 Meeting with Management to review improvement plan. Factory tour to review OSH issue. Preparation of the PICC election. Bipartite meeting with unions and management  
 25-Nov-17 PICC training  
 13-Apr-18 Meeting with management to update improvement plan with remediation efforts. Factory tour to verify OSH remediation efforts. PICC meeting to establish a workplan in order to improve workplace communication and address non compliance issues.

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDATION EFFORTS	MONTHS
<b>Assessment November 2017</b>						
Nov-17	<b>Freedom of Association and Collective Bargaining</b>	<b>Interference and Discrimination</b>	The factory terminated 8 union leaders for absence during a sectorial strike.	Reinstate terminated union leaders.	The factory has an agreement with the union for the full payment of the notice period to terminated union leaders.	5
Nov-17	<b>Contract and Human Resources</b>	<b>Dialogue, Discipline and Disputes</b>	Incidents of verbal abuse from supervisors reported by workers and observed during the assessment visit.	Train supervisors and managers on the anti-harassment and abuse policy.	The factory trained the supervisors on the anti-harassment and abuse policy. Managers training is scheduled for the end of the month.	5
Nov-17	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	Unlabeled chemicals in use on the floor.	Elaborate a chemicals management policy. Assign staff in charge of monitoring compliance with labeling requirements. Conduct regular checks.  The factory hired two additional compliance officer. The compliance team conducts daily checks on the floors.	The factory hired two additional compliance officers. The compliance team conducts daily checks on the floors.	30
Nov-17	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	Inadequate storage of chemicals and hazardous substances.	Elaborate a chemicals management policy. Assign staff in charge of monitoring the chemicals storage.	The factory hired two additional compliance officer. The compliance team conducts daily checks on the floors.	5

Nov-17	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	Chemical safety data sheets were missing for some chemicals and hazardous substances in the workplace.	Elaborate a chemicals management policy. Assign staff in charge of monitoring compliance with MSDS requirements. Post the missing MSDS. Conduct regular checks.	The factory hired two additional compliance officers. The compliance team conducts daily checks on the floors.	16
Nov-17	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	No washing facilities or cleansing materials in the event of chemical exposure in some areas where chemicals are used.	Elaborate a chemicals management policy. Assign staff in charge of monitoring compliance with labeling requirements. Install the missing eye wash stations. Conduct regular checks.	The factory hired two additional compliance officer. The compliance team conducts daily checks on the floors.	36
Nov-17	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	30 percent of the single needle machines in one building did not have finger guards.	Improve the machine maintenance procedures. Assign staff in charge of monitoring availability of machine guards. Install the missing machine guards. Conduct regular checks.	Missing machine guards were installed. The factory hired two additional compliance officers. The compliance team conducts daily checks on the floors to monitor the availability of machine guards.	5
Nov-17	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	7 electrical boxes in the workplace did not have any safety warning signs.	Ensure that all electrical installations are properly marked.	The factory marked all electrical installations. The factory hired two additional compliance officers. The compliance team conducts daily checks on the floors to monitor the availability of warning signs.	5
Nov-17	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	Insufficient number of toilets.	Increase the number of toilets. Maintain the existing ones.	The factory has a maintenance plan for the existing toilets.	36
Nov-17	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	During the factory tour, EAs observed that no soap was provided in the factory toilets.	Ensure that soap is available in toilets during working hours.	The factory provided soap. The compliance team conducts daily checks on the floors to monitor the availability of soap during working hours.	36



Nov-17	Occupational Safety and Health	Welfare Facilities	Insufficient eating area.	Increase the number of seats in the eating areas.	The factory is building additional benches for the eating area.	24
Nov-17	Occupational Safety and Health	Health Services and First Aid	The factory did not provide health checks to workers who have been exposed to work-related hazards.	Provide health checks to workers who have been exposed to work-related hazards.	The factory provided the first health checks to workers who have been exposed to work-related hazards.	5
Nov-17	Occupational Safety and Health	Health Services and First Aid	The factory did not provide annual medical checks for workers.	Provide annual health checks to all workers.	The factory hired two additional doctors to provide annual health checks to all workers.	5
Nov-17	Occupational Safety and Health	Health Services and First Aid	Insufficient medical staff.	Hire additional medical staff as required by law.	The factory hired two additional doctors to provide annual health checks to all workers.	36
Nov-17	Occupational Safety and Health	Health Services and First Aid	First aid boxes not properly maintained.	Ensure that first aid boxes are properly supplied and easily accessible during working hours.	The nurses refilled all first aid boxes as required. The compliance officers monitor the availability of first aid supplies on a daily basis.	5
Nov-17	Occupational Safety and Health	Emergency Preparedness	Fire alarm systems in one building was not operational.	Install fire alarm in module 4.	The factory installed a fire alarm in module 4.	5
Nov-17	Occupational Safety and Health	Emergency Preparedness	Firefighting equipment not properly maintained.	Ensure that all fire extinguishers are properly maintained and easily accessible.		30
Nov-17	Occupational Safety and Health	Emergency Preparedness	inadequate marking or posting of emergency exits and/or escape routes in the workplace.	Ensure that evacuation plans are updated, available and displayed in all buildings.	Evacuation plans was updated and displayed in module 4.	5
Nov-17	Occupational Safety and Health	Emergency Preparedness	One building only had one emergency exit for the entire building.	Add another exit door for Module 4	The factory added another exit for module 4	5
Nov-17	Occupational Safety and Health	Emergency Preparedness	Some emergency exits were not easily accessible, unobstructed, and/or unlocked during working hours, including overtime.	Ensure that all exits are easily accessible during working hours.		5

Nov-17	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	Fire drills were not conducted every 6 months in all buildings.	Conduct fire drill in all buildings every 6 months.		5
Nov-17	<b>Working Time</b>	<b>Regular Hours</b>	Working time records reliability was not confirmed.	Ensure that reasons for manual input of hours are properly recorded.		5
<b>Assessment December 2016</b>						
Dec-16	<b>Freedom of Association and Collective Bargaining</b>	<b>Collective Bargaining</b>	The CBA is not fully implemented.	Communicate the CBA to all management staff. Ensure that lunch is provided after 5 hours of work on Sundays.	The current CBA expired. The factory is renegotiating the CBA.	
Dec-16	<b>Compensation</b>	<b>Paid Leave</b>	Nursing women were not properly compensated for the breastfeeding break.	Review the breastfeeding policy. Ensure that all eligible women take advantage of the one hour breastfeeding break as required by law.	All women entitled to the benefit have actually benefited from the policy. A change in the rules now allows them to take 1 hour of paid breastfeeding time.	
Dec-16	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	Inaccurate and late ONA payment.	Review ONA payment procedures to ensure that the payments are accurate.	The ONA payment was revised to ensure that the amount paid by the employer is equivalent to the amount collected from workers.	
Dec-16	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	Late submittal of workers contribution to ONA.	Review ONA payment procedures to ensure that the payments are accurate.	ONA payments are done on time, the total amount collected from workers matched the total amount paid by the employers. The total amount is transferred to ONA.	
Dec-16	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	The employer did not pay for work-related accident insurance for the 2016-2017 fiscal year.	Review the OFATMA payment procedures to ensure that the payments are done on time.	OFATMA accident insurance has been paid for the year 2016/2017.	
Dec-16	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	The employer is not affiliated with OFATMA for maternity and health insurance services (workers' contributions).	Register with OFATMA for maternity and health insurance services.	The factory is registered with OFATMA as of September 2017 and the invoice fully paid. The factory communicated the information to workers.	

Dec-16	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	The employer does not collect and forward workers contribution OFATMA maternity and health insurance (workers' contribution).	Register with OFATMA for maternity and health insurance services and collect and forward workers contribution OFATMA maternity and health insurance.	The factory is registered with OFATMA as of September 2017 and the invoice fully paid. The factory communicated the information to workers.	
Dec-16	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	Two gallons of unlabeled chemicals were observed in the mechanic shop at Module 1.	Review the chemicals handling procedures. Communicate new procedures to all staff using chemicals and monitor its implementation.	All chemicals containers used in spot cleaning areas have been properly identified. All personnel handling chemicals have been instructed to only use properly identified and assigned containers for the use of chemicals. Daily checks are conducted to ensure that all procedures are in place and	
Dec-16	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	No MSDS available for all chemicals used in the workplace.	Review the chemicals handling procedures. Communicate new procedures to all staff using chemicals and regularly monitor the availability of MSDS.	The MSDS were translated in creole to facilitate better understanding of the products in use and improve workers' behavior in handling chemicals. The original English version has also been posted.	
Dec-16	<b>Occupational Safety and Health</b>	<b>Working Environment</b>	The temperature level in the Building 3 sewing section exceeded the BW recommended limit of 30 C.	Reduce the temperature in the sewing area.		
Dec-16	<b>Occupational Safety and Health</b>	<b>Working Environment</b>	The noise levels throughout Building 3 exceeded the BW recommended maximum of 90 dB.	Reduce the level of noise in the workplace.		
Dec-16	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	Insufficient number of toilets.	Repair or replace the existing toilets.	New personnel has been hired to repair and maintain all toilets in the facility. The equipment is continuously maintained to improve usability and availability.	

Dec-16	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	No soap was provided in the workers' toilets.	Monitor the availability of soap on a regular basis.	Additional soap dispensers have been installed. Daily checks are conducted to ensure that dispensers are filled with soap at regular interval throughout the day.	
Dec-16	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	The number of seats in the eating area is inadequate.	Expand the eating area to accommodate all workers.	A new cafeteria is under construction. The new facility is expected to provide seating capacity to accommodate all workers.	
Dec-16	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	The factory only has 2 nurses and 3 doctor's visits each week.	To comply with the Haitian Labor Code, a factory of this size must have a permanent on site medical service, with at least 13 nurses and 3 doctor's visits per week.	The factory participated in the factory clinic improvement program. The factory won the "Best Improvement award" for successful completion of their improvement plan.	
Dec-16	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	Fire extinguishers were blocked by cardboard boxes in the fabric warehouse of Module 1 and mezzanine area 2.	Communicate the compliance requirements for fire extinguishers to all the staff working in the mezzanine area.	The monitoring of fire fighting equipment has been reinforced. The OSH committee is taking a more active role in helping keep all necessary equipment free of obstacle. Daily checks are conducted to ensure that the procedures are enforced.	
Dec-16	<b>Working Time</b>	<b>Overtime</b>	The employer does not have an authorization from the Ministry of Labor for working on Sundays.	Obtain an authorization from the Ministry of Labor for working on Sundays.	A correspondence has been sent to the MAST to request authorization for Sunday Work. However a new regulation eliminated this requirement.	
Dec-16	<b>Working Time</b>	<b>Overtime</b>	The employer does not have an authorization from the Ministry of Labor for working overtime.	Request an authorization from the Ministry of Labor for overtime work.	A correspondence has been sent to the MAST to request authorization for overtime work. However a new regulation eliminated this requirement.	

**BETTER WORK HAITI - 16TH SYNTHESIS REPORT**



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

Advisory and Training Services

19-Oct-17 PICC meeting on internal issues such as ongoing temporary suspension due to lack of work.  
 8 & 9-Dec-2017 Human resources management training

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDIATION EFFORTS	MONTHS
<b>Assessment April 2017</b>						
Oct-17	Compensation	Paid Leave	Legally mandated holidays is based on the minimum wage of reference.	Ensure the payments for legally mandate holidays are paid correctly.		16
Oct-17	Compensation	Paid Leave	The payment for weekly rest days is based on the minimum wage of reference.	Pay weekly rest day accurately		16
Oct-17	Occupational Safety and Health	Social Security and Other Benefits	ONA contributions made were less than 6 percent of the workers' base salaries	Pay ONA' deductions accurately and on time		16
Oct-17	Occupational Safety and Health	Social Security and Other Benefits	ONA contributions made were less than 6 percent of the workers' base salaries.	Pay ONA' deductions accurately and on time		16
Oct-17	Occupational Safety and Health	Social Security and Other Benefits	The amount paid to OFATMA for work-related accident insurance is less than 3 percent of the workers' base salary.	Register with OFATMA for maternity and health insurance		16
Oct-17	Occupational Safety and Health	Social Security and Other Benefits	The factory has not yet registered with OFATMA for maternity and health insurance.	Register with OFATMA for maternity and health insurance		16
Oct-17	Occupational Safety and Health	Social Security and Other Benefits	The factory has not yet registered with OFATMA for maternity and health insurance.	Register with OFATMA for maternity and health insurance		16

Oct-17	Occupational Safety and Health	OSH Management Systems	The OSH policy does not include establishing measurable objectives and improvement targets and is not developed through consultation with workers and their representatives	Ensure to have an adequate written OSH policy	5
Oct-17	Occupational Safety and Health	Chemicals and Hazardous Substances	In the spot cleaning area, the chemicals and hazardous substances labeling does not comply with legal requirements. For example, some containers only show the name of the product and some labels are in a foreign language.	Label all the chemicals and hazardous substances in local language.	16
Oct-17	Occupational Safety and Health	Chemicals and Hazardous Substances	MSDS were missing for several chemicals in the spot cleaning area and in the chemical warehouse..For many chemicals, MSDS' were only available in English instead of the workers' native language.	Provide MSDS' for all chemical substances used in the workplace in local language.	16
Oct-17	Occupational Safety and Health	Worker Protection	The factory has not provided goggles and impervious aprons for the chemical warehouse workers and the face masks provided were in poor condition.	Ensure to give appropriate protective equipment to workers.	5
Oct-17	Occupational Safety and Health	Worker Protection	Workers in the embroidery area were not using the provided earplugs to protect themselves from the high level of noise in the section.	Provide earplugs to workers in the embroidery area	5
Oct-17	Occupational Safety and Health	Worker Protection	Shock absorbing mats were not provided to most workers in the inspection areas of the different modules	Provide absorbing mats or foot rest to standing workers	16
Oct-17	Occupational Safety and Health	Worker Protection	70% of the sewing machines did not have belt and eye guards and another machine located in the cutting area did not have a pulley guard	Ensure that all machines have their appropriate guards	16
Oct-17	Occupational Safety and Health	Working Environment	Temperature levels as follows exceeded 30 C	Ensure that temperature is under 30 C	16

Oct-17	Occupational Safety and Health	Working Environment	Insufficient light levels	Ensure the workplace is adequately lit		16
Oct-17	Occupational Safety and Health	Welfare Facilities	Insufficient toilets	Comply with legal requirements regarding the number of the toilets		16
Oct-17	Occupational Safety and Health	Health Services and First Aid	No regular health checks provided to workers exposed to work-related hazards.	Arrange at least two medical checks for workers exposed to work-related hazards		16
Oct-17	Occupational Safety and Health	Health Services and First Aid	Annual medical checks have not been conducted for all eligible workers according to national law.	Arrange an annual medical check for every worker.		16
Oct-17	Occupational Safety and Health	Health Services and First Aid	Insufficient medical staff.	Comply the legal requirements regarding medical staff		16
Oct-17	Occupational Safety and Health	Health Services and First Aid	Less than 10% of the workforce have been trained in first-aid.	Train 10% of the workforce in first aid		16
Oct-17	Occupational Safety and Health	Emergency Preparedness	No fire detection system in the back warehouse	Ensure the workplace has adequate firefighting equipment. Install fire detection system in the back warehouse		16
Oct-17	Occupational Safety and Health	Emergency Preparedness	The power outlet in the spot cleaning was not safeguarded.	Safeguard any source of ignition. Cover the power outlets		5
Oct-17	Working Time	Overtime	No valid authorization from the Department of Labour before working overtime.	Ensure to obtain a valid authorization from the Department of Labour before working overtime		16
<b>Assessment April 2016</b>						
Nov-16	Compensation	Paid Leave	Sick leave payments are based on the minimum wage	Calculate sick leave based on average earnings.	The factory paid sick leave based on average earnings as stipulated by the law.	
Nov-16	Compensation	Paid Leave	The maternity leave payments are based on the minimum wage	Calculate maternity leaves based on average earnings.	Maternity is calculated on average earnings as stipulated by the law.	
Nov-16	Compensation	Social Security and Other Benefits	ONA contributions are less than 6 percent of workers' base salaries. Late payment of ONA.	Ensure that ONA payments are on time and accurate.		
Nov-16	Compensation	Social Security and Other Benefits	ONA contributions are less than 6 percent of workers' base salaries	Ensure that ONA payments are on time and accurate.		

Nov-16	Compensation	Social Security and Other Benefits	The amount paid by the employer to OFATMA is less than 3 percent of the workers' base salary.	Ensure that the payment to OFATMA for work-related accident insurance is accurate.		
Nov-16	Compensation	Social Security and Other Benefits	The factory has not yet registered with OFATMA for maternity and health insurance.	Register the factory for OFATMA's maternity and health insurance services.		
Nov-16	Compensation	Social Security and Other Benefits	The factory has not yet registered with OFATMA for maternity and health insurance.	Register the factory for OFATMA's maternity and health insurance services.		
Nov-16	Contract and Human Resources	Employment Contracts	The factory's internal work rules have not been approved by the Ministry of Labor (MAST). Management showed a copy of the request letter sent to MAST, yet approval is pending	Ensure that the factory's internal work rules are approved by the Ministry of Labor (MAST).	The factory's internal work rules document has been approved by the Ministry of Labor (MAST).	
Nov-16	Contract and Human Resources	Dialogue, Discipline and Disputes	Workers who do not complete 40-50 percent of daily production targets by midday are laid off for the rest of the day as a disciplinary measure.	Ensure that the factory's internal work rules are approved by the Ministry of Labor (MAST).	The factory's internal work rules are approved by MAST.	
Nov-16	Occupational Safety and Health	Chemicals and Hazardous Substances	Unlabeled containers of chemicals	Ensure that chemicals are properly labeled and stored.	The factory labeled all container in the boiler room, in the mechanic shop and in the spot cleaning	
Nov-16	Occupational Safety and Health	Chemicals and Hazardous Substances	Missing MSDS'	Provide chemical safety data sheets for all the hazardous chemicals used in the workplace.	The management has posted safety data sheets in the spot cleaning area.	
Nov-16	Occupational Safety and Health	Chemicals and Hazardous Substances	No proof of chemical handling safety training was provided during the assessment.	Keep records of chemical handling safety training sessions.		
Nov-16	Occupational Safety and Health	Worker Protection	Several standing workers in the inspection areas were not provided with anti-fatigue mats or foot rests.	Comply with ergonomic requirements at the workplace.	The management provided anti-fatigue mats to standing workers who needed it.	
Nov-16	Occupational Safety and Health	Worker Protection	More than 50 percent of all machines were missing pulley guards.	Install proper safety guards on the machines. Conduct regular maintenance.	The management did an inventory of missing guards. The order has been done and they are waiting for the delivery to install the missing parts	
Nov-16	Occupational Safety and Health	Working Environment	The temperature exceeded the BW recommended limit of 30 C.	Ensure that the workplace temperature does not exceed 30 C.		
Nov-16	Occupational Safety and Health	Working Environment	The noise level exceeded the BW recommended limit of 90 dB.	Ensure that noise levels are maintained within the recommended limit.	Recent checks done on a regular basis revealed that the pressing section is under 90 dB.	



Nov-16	<b>Occupational Safety and Health</b>	<b>Working Environment</b>	Several sections around the workplace were inadequately lit.	Adequately light the workplace.		
Nov-16	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	Insufficient toilets	Provide an adequate number of toilets according to the size of the workforce.	The factory has 11 toilets for men.	
Nov-16	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	No systematic medical checks were arranged for newly hired workers within the first three months of employment.	Ensure that newly hired workers received a medical check within the first three months of employment.	The factory recently hired a doctor who comes three times a week and provide health checks to workers.	
Nov-16	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	No systematic medical checks were arranged for workers who have been exposed to work-related hazards.	Ensure that workers who have been exposed to work-related hazards receive regular medical checks.	The factory recently hired a doctor who come three times a week and provide health checks to workers.	
Nov-16	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	No systematic annual medical checks were arranged for workers.	Conduct annual medical checks for all workers.	The factory recently hired a doctor who come three times a week and provide health checks to workers.	
Nov-16	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	The factory has 2 full time nurses and 1 doctor's visit per week.	To comply with the Haitian labour code, a factory of this size must have a permanent on site medical service, with at least 7 nurses and 3 doctor's visits per week.	The factory has modified his contract with the doctor. The doctor's comes three days a week.	
Nov-16	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	Only 38 workers were trained in first-aid.	To comply with the Haitian labour code, a factory of this size must have at least 144 workers trained in first-aid.		
Nov-16	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	No smoke detectors were installed in the fabric warehouse on floor 2.	Install smoke detectors where needed.		
Nov-16	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	2 fire extinguishers were found with low pressure. Several unidentified fire extinguishers	Provide an adequate number of functional and identifiable fire-fighting equipment.	All the extinguishers are functional and have been mounted on the walls with identification signs. During the last advisory visit, EAs also noted that the equipment was being checked on a monthly basis.	
Nov-16	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	Only 38 workers were trained in fire-fighting procedures.	To comply with the Haitian Labor Code, a factory of this size must have at least 144 workers trained in fire safety.	The factory trained 24 workers in fire safety on January 2017.	

Nov-16	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	Cellular phones were being charged with exposed wires in the mechanic shop and the stock trim warehouse.	Install a proper phone charging station.		
Nov-16	<b>Working Time</b>	<b>Overtime</b>	No authorization from the Department of Labour before working on Sundays.	Obtain a valid authorization from the Department of Labour before working on Sundays.		
Nov-16	<b>Working Time</b>	<b>Overtime</b>	No authorization from the Department of Labour before working overtime.	Obtain a valid authorization from the Department of Labour before working overtime.		

**BETTER WORK HAITI - 16TH SYNTHESIS REPORT**



**Factory:** Horizon Manufacturing S.A.  
**Location:** Port-au-Prince  
**Number of workers:** 671  
**Date of BW registration:** Aug-10  
**Date of last two Better Work assessments:** Jun-17 Apr-16

Advisory and Training Services

29-Sep-17 Discussion on the composition of the PICC committee. Discussion on the election process, tools and calendar.  
 23-Feb-18 Discussion with management on the improvement plan updates. Discussion with PICC committee members on the compensation and OSH concerns

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDATION EFFORTS	MONTHS
<b>Assessment June 2017</b>						
Jun-17	Compensation	Overtime Wages	Inaccurate payment for night shift work.	Pay for night shift work according to the Labor Code.	A security company has been hired to only cover the night shift.	23
Jun-17	Compensation	Paid Leave	Inaccurate payment for non-working holidays.	Pay for non-working holidays according to the Labor Code.	The factory is accurately paying for non-working holidays based on the workers' average earnings.	11
Jun-17	Compensation	Paid Leave	Inaccurate payments for weekly rest days.	Pay for weekly rest days according to the Labor Code.	Since June 2017, the factory is accurately paying for weekly rest days based on the workers' average earnings.	11
Jun-17	Compensation	Social Security and Other Benefits	Late and inaccurately calculated ONA payments.	Comply with the law regarding ONA contributions.	The factory now calculates ONA contributions based on the basic salary as stipulated by the law.	11
Jun-17	Compensation	Social Security and Other Benefits	Late and inaccurately calculated ONA payments. The workers' contribution is higher than what is legally required.	Comply with the law regarding ONA contributions.	The factory now calculates ONA contributions based on the basic salary as stipulated by the law.	11

Jun-17	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	OFATMA contributions are inaccurate and no contributions are paid on behalf of the workers in Building 32.	Register the workers of Building 32 for OFATMA's maternity and health insurance services.	All the workers of Building 32 have been registered for OFATMA's maternity and health insurance. The factory has also started to pay monthly contributions to OFATMA for this service. However, the deductions are still based on the workers' total earnings instead of their base salary.	11
Jun-17	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	OFATMA contributions are inaccurate and no contributions are collected and forwarded on behalf of the workers in Building 32.	Collect and forward contributions from the workers' of Building 32 for OFATMA's maternity and health insurance services. Ensure that these monthly deductions from the workers' salaries are accurate.	The workers from Building 32 have been registered for OFATMA's maternity and health insurance services. However, the deductions are still based on the workers' total earnings instead of their base salary.	11
Jun-17	<b>Contract and Human Resources</b>	<b>Termination</b>	No notifications sent to MAST before initiating temporary suspensions.	Notify the Ministry of Labor prior to initiating temporary suspensions.	Management attended the labor law training provided by Better Work and reviewed the procedures related to communication and coordination between the Human Resources and the Production departments regarding workforce capacity adjustments.	23
Jun-17	<b>Occupational Safety and Health</b>	<b>OSH Management Systems</b>	Records for work-related accidents are not sent to OFATMA on a monthly basis.	Send monthly work-related accidents and diseases records to OFATMA.	The factory is sending work-related accidents and diseases reports on a monthly basis.	11
Jun-17	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	No updated inventory of chemicals and hazardous substances maintained in the workplace.	Keep an inventory of chemicals and hazardous substances used in the workplace.	The factory keeps an inventory of all chemicals.	11
Jun-17	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	During the factory tour, EAs observed 2 unlabeled chemical containers in the chemical room of Building 32.	Label all chemical containers used in the workplace.	The factory labeled all the chemical containers in the chemical room.	11
Jun-17	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	No MSDS' were found for thinner and blow out in the spot cleaning and chemical storage areas of Buildings 32.	Post MSDS' for all chemicals used and stored in the workplace.	During the assessment, the factory took immediate corrective action and posted the corresponding MSDS' in the noted areas.	11

Jun-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Documented evidence of chemical safety training for workers were unavailable.	Document and record safety training provided to workers.	The factory has started to document training conducted for workers and shared the last training records with the BW advisor.	11
Jun-17	Occupational Safety and Health	Chemicals and Hazardous Substances	No eye washing facilities were available for workers in the spot cleaning area of Building 32. Eye washing solution was missing in the chemical room of Building 31.	Provide eye washing facilities where needed.	The factory installed one eye washing station in Building 32. They have also ordered another washing station for the chemical room in Building 31.	23
Jun-17	Occupational Safety and Health	Worker Protection	Inappropriate masks were provided to workers using chemicals in the spot cleaning area of Building 32.	Provide appropriate personal protective equipment to workers who are using chemicals.	The factory provided appropriate masks for workers in the spot cleaning area.	11
Jun-17	Occupational Safety and Health	Worker Protection	Shock absorbing mats were not provided to several standing workers in the packing and inspection sections of Building 32.	Provide shock absorbing mats or foot rests to standing workers in the noted sections of Building 32.	The factory provided shock absorbing mats to all standing workers	11
Jun-17	Occupational Safety and Health	Worker Protection	More than 30 percent of all machines in Building 32 were missing pulley guards. Also, 15 percent of the single needle machines were missing finger guards.	Install all the necessary safety guards on the machines.	Pulley guards have been installed on all machines in both buildings. Eye guards have been installed on 95% of the concerned machines. The issue with the missing finger guards is still pending.	11
Jun-17	Occupational Safety and Health	Worker Protection	Several electrical wires were dusty or uncovered. Also, access to 1 electrical box was obstructed by piles of cartons near the mechanic shop in Building 32.	Safeguard all potential sources of ignition. Properly maintain all types of the electrical equipment.	The factory cleared access to all electrical boxes in the factory.	11
Jun-17	Occupational Safety and Health	Working Environment	The temperature was over 30 C in the sewing, packing, quality and pressing sections.	Ensure that workplace temperatures are maintained under the Better Work recommended limit of 30 C.		11
Jun-17	Occupational Safety and Health	Working Environment	Inadequate lighting noted in the packing, cutting, sewing, quality and pressing sections.	Ensure that light levels are adequate in the noted sections.		11
Jun-17	Occupational Safety and Health	Working Environment	The compressor room in Building 32 is not clean and tidy.	Ensure that the compressor room is clean and tidy at all times.	The factory has assigned a person in charge of regularly monitoring the cleanliness of the compressor room.	11

Jun-17	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	The factory does not have the required number of toilets for workers.	Provide the required number of toilets for workers according to the Haitian Labor Code.	The factory now provides an adequate number of functioning toilets for workers in accordance with the law.	11
Jun-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	No medical checks arranged for newly hired workers within the first three months of employment.	Arrange medical checks for newly hired workers within the first three months of employment.	The factory has assigned the onsite doctor to conduct health checks for newly hired workers within their first three months of employment.	11
Jun-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	No periodic medical checks were arranged for workers who have been exposed to work-related hazards.	Arrange, at least, two medical checks for workers who have been exposed to work-related hazards.	The factory has assigned the onsite doctor to conduct health checks for workers who have been exposed to work-related hazards.	11
Jun-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	Only 35 percent of the workers received annual medical checks.	Arrange at least one annual health check per year for all workers.	The factory has scheduled to complete annual health checks for the remaining workers through OFATMA by the end of this year.	11
Jun-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	Insufficient number of onsite medical staff.	Have a permanent onsite medical service, with at least 3 nurses and 3 doctor's visits per week.	The factory signed a new contract with a doctor who will be available onsite for 6 days a week; the doctor's weekly hours will be equally divided between the two factory units.	11
Jun-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	Insufficient number of worker trained in first-aid.	Train a sufficient number of workers on first aid.	The factory provided first aid training to 40 additional workers this year. Along with the workers who have been previously trained, the factory is now in compliance with this requirement.	11
Jun-17	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	3 obstructed and one overcharged fire extinguishers.	Ensure that access to fire extinguishers remain unobstructed. Regularly check that the fire fighting equipment are always functional.	Daily internal checks are performed to ensure that the fire fighting equipment are easily accessible and functional at all times.	11
Jun-17	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	Only one fire drill conducted per year.	Perform at least 2 fire drills per year as per Better Work's recommendation.	The factory conducted two drills in 2017, one was in February and another in August 2017.	11

Jun-17	<b>Working Time</b>	<b>Regular Hours</b>	Pregnant women are not aware of their right to take two additional breaks of half hour each.	Develop a policy and inform pregnant workers about their right to take two additional breaks per day.	The factory had an awareness meeting with all the pregnant women employed at the factory. Informational notices have also been posted throughout the floor.	11
<b>Assessment April 2016</b>						
Apr-16	<b>Compensation</b>	<b>Overtime Wages</b>	Compensation for overtime hours worked at night was incorrectly calculated for two security guards.	Ensure that the security guards' compensation is compliant with the law.	The payments for all the security guards were adjusted accordingly.	
Apr-16	<b>Compensation</b>	<b>Premium Pay</b>	Inadequate payment for working hours performed at night.	Ensure that the security guards' compensation is compliant with the law.	The payments for all the security guards were adjusted accordingly.	10
Apr-16	<b>Compensation</b>	<b>Premium Pay</b>	The compensation for regular hours worked on weekly rest days was incorrectly calculated for two security guards.	Ensure that the security guards' compensation is compliant with the law.	The payments for all the security guards were adjusted accordingly.	
Apr-16	<b>Compensation</b>	<b>Paid Leave</b>	Calculations for the annual leave in inaccurate for some workers.	Include maternity leave payments as a part of total earnings and therefore to calculate the annual leave.	Maternity leave payments are included in the calculation of annual leave.	
Apr-16	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	The annual salary supplement or bonus was incorrectly paid to some workers.	Include maternity leave payments as a part of total earnings and therefore to calculate the annual salary bonuses.	Maternity leave payment is included as a part of total earnings and is used to calculate bonus payments.	
Apr-16	<b>Compensation</b>	<b>Termination</b>	The factory failed to notify MAST for all temporary suspension of work.	Send prior notice to MAST regarding all work stoppages.	A system was put in place to send prior notice to MAST regarding all work stoppages.	
Apr-16	<b>Contract and Human Resources</b>	<b>Chemicals and Hazardous Substances</b>	Expired eye wash solution bottle found in the chemical storage area	Ensure that the eye wash station is adequate for use.	A new washing station was installed in the spot cleaning area.	
Apr-16	<b>Occupational Safety and Health</b>	<b>Working Environment</b>	The noise level is over the recommended limit in the pressing section.	Ensure that the noise levels do not surpass 90 dB in the pressing area.	The motor responsible for the noise was removed from the section.	

Apr-16	<b>Occupational Safety and Health</b>	<b>Working Environment</b>	The lux level is under the recommended limit in some sections.	Ensure that the light levels are compliant with the suggested requirements for each section.	Management has added skylight sheets in one of the sections and intends to add more in other areas to address this issue.	
Apr-16	<b>Working Time</b>	<b>Overtime</b>	Excessive overtime for the security staff and workers from the maintenance department.	Limit overtime hours to a maximum of 80 hours within a 3 month period.	The management has limited the number of overtime hours for all the workers at the factory.	



**BETTER WORK HAITI - 16TH SYNTHESIS REPORT**



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

**Advisory and Training Services**

27-Sep-17                      Advisory visit to discuss latest assessment findings. A calendar was prepared for the PICC's implementation.  
 17-Nov-17                      Discussion with management on advisory services in general. PICC awareness day (awareness among workers about the committee) to find the volunteers  
 14-Mar-18                      Discussion on advisory priorities and improvement plan. PICC election of worker representatives

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDATION EFFORTS	MONTHS
<b>Assessment August 2017</b>						
Aug-17	Compensation	Overtime Wages	Attendance records do not reflect the actual hours worked for workers in the sewing line.	Ensure that attendance records reflects exactly the working time for all workers.		11
Aug-17	Compensation	Wage Information, Use and Deduction	Inaccurate Payroll records. Time records were inconsistent with the payrolls for overtime hours.	Record overtime hour worked, and keep only one accurate payroll.	The factory technician has finalized the system changes to reflect the accurate overtime which be reflected on the May payroll payment.	11
Aug-17	Compensation	Paid Leave	Payments for sick leaves are based on the minimum wage instead of average earnings.	Ensure that payments for sick leave are based on workers' average earnings.	Sick leave are based on the workers average earnings.	11
Aug-17	Compensation	Paid Leave	Payments for maternity leaves are based on the minimum wage instead of average earnings.	Ensure that payments for maternity leaves are based on workers average earnings.	Maternity leave are based on the workers average earnings.	11
Aug-17	Compensation	Social Security and Other Benefits	Employer contributions to ONA are based on a fixed salary for all workers.	Ensure that ONA payments are based on the base salary instead of a fixed salary for all workers.	The factory decided to continue to apply their existing calculation principle for ONA payments.	44
Aug-17	Compensation	Social Security and Other Benefits	Collecting and forwarding worker's contributions for social insurance funds to ONA.	Ensure that ONA payments are based on the basic salary for all workers.	The factory decided to continue to apply their existing calculation principle for ONA payments.	44

Aug-17	Compensation	Social Security and Other Benefits	Employer contribution to OFATMA for work-related accident insurance.	Ensure that employers' contributions to OFATMA for work-related accident insurance is based on workers' basic salary.		44
Aug-17	Compensation	Social Security and Other Benefits	Workers' contributions to OFATMA for maternity and health insurance.	Collect and forward workers' contributions to OFATMA for maternity and health insurance.	The factory is in the process of registering workers to OFATMA for maternity and health insurance.	44
Aug-17	Compensation	Social Security and Other Benefits	Employer contribution to OFATMA for maternity and health insurance.	Pay the employer contribution to OFATMA for maternity and health insurance services.	The factory is in the process of registering workers to OFATMA for maternity and health insurance.	44
Aug-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Inventory of chemicals and hazardous substances used in the workplace is not up to date.	Keep an inventory of chemicals and hazardous substances used in the workplace.	The factory keeps an inventory of chemicals used in the workplace.	7
Aug-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Unlabeled containers	Ensure that all containers are labeled	The factory bought new containers and labeled them before giving them to workers.	26
Aug-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Chemicals and hazardous substances not properly stored.	Store chemicals and hazardous substances in the designated chemical warehouse.	All chemicals have been rearranged and labeled and stored in the chemical room.	7
Aug-17	Occupational Safety and Health	Chemicals and Hazardous Substances	MSDS Not available for all chemicals.	Ensure that the MSDS for all hazardous chemicals used in the workplace are available. Translate the MSDS in local language as needed.	MSDS are available for all chemicals used in the workplace.	26
Aug-17	Occupational Safety and Health	Chemicals and Hazardous Substances	No actions taken to limit workers exposure to hazardous substances.	Measure workers' exposure to hazardous substances.	The nurses and doctors on site trained workers exposed on the use of chemicals and hazardous substances.	26
Aug-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Washing facilities or cleansing materials are not available in the event of chemical exposure.	Provide adequate washing facilities and cleansing materials in the event of exposure to hazardous chemicals.	Eye wash station installed in adequate location near spot cleaning area.	26

Aug-17	Occupational Safety and Health	Worker Protection	No training on the safe use of boilers were provided to the assessors at the time of assessment.	Train and encourage workers to use PPE, machines and equipment safely.	The factory scheduled a training for the maintenance team with an expert on Boiler Safety and procedures. Moreover, the factory has purchased additional PPE to be available in the boiler and generator room in addition to the regular equipment available.	7
Aug-17	Occupational Safety and Health	Worker Protection	Guards are not installed on all dangerous parts of machines and equipment.	Install proper guards and maintain them on all dangerous parts of machines and equipment.	The factory completed the installation of the pulley guards on 70 percent of the sewing machines. Equipment for the remaining ones has been purchased and installation completed soon.	56
Aug-17	Occupational Safety and Health	Worker Protection	Lack of electrical maintenance	Ensure that electrical wires, cables, switches, plugs and equipment are properly maintained.	The electrical box in the boiler room of Building 29 was covered.	29
Aug-17	Occupational Safety and Health	Worker Protection	1 electrical box in the boiler room of Building 29 was missing a hazard warning sign.	Identify electrical hazards and post safety warnings in the workplace.	The warning sign was posted on the electrical box in the boiler room.	7
Aug-17	Occupational Safety and Health	Working Environment	Workplace temperature exceeds BW recommended limit of 30 C.	Improve the temperature levels throughout the workplace.	The factory bought fans to replace those that were damaged.	26
Aug-17	Occupational Safety and Health	Working Environment	Workplace lighting does not reach Better work recommended limits in sewing and packing sections.	Increase the light level in the indicated areas.	The factory replaces defective bulbs on a weekly basis to avoid those types of issues.	7
Aug-17	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets.	Ensure that the factory has 13 functioning toilets for men and 43 functioning toilets for women.	The factory has repeatedly asked SONAPI for this since they are renting the buildings from SONAPI. No waiting lines are seen in front of toilets.	80
Aug-17	Occupational Safety and Health	Welfare Facilities	The capacity of the eating area is not sufficient to accommodate all the workers.	Ensure that the eating area can accommodate all workers.	The factory arranged a covered area in front of each of their buildings with tables as an eating area.	80

Aug-17	Occupational Safety and Health	Health Services and First Aid	Insufficient medical staff.	Hire additional medical staff, at least 7 nurses and 3 doctor's visit per week.	The factory counts 3 nurses, 1 permanent doctor and another doctor who comes one day per week but is available on a needs basis on all days.	26
Aug-17	Occupational Safety and Health	Health Services and First Aid	Access to 1 first aid box in Building 10 was obstructed by boxes at the time of assessment.	Ensure first aid box are accessible and remain unobstructed.	First aid boxes in building 10 are accessible.	26
Aug-17	Occupational Safety and Health	Emergency Preparedness	No smoke detectors were observed in the trim warehouse of Building 30.	Install fire detection and alarm system.	Smoke detector was installed in the warehouse of Building 30.	7
Aug-17	Occupational Safety and Health	Emergency Preparedness	Obstructed and missing fire fighting equipment.	Replace missing fire extinguishers and ensure they are not obstructed. Identify a person in charge of the daily verification.	The factory called its supplier for the maintenance of the extinguishers to fix and replace the missing ones.	26
Aug-17	Occupational Safety and Health	Emergency Preparedness	Operating procedures not available for boilers.	Ensure that the procedure is available and train operators on the safe use of boilers.	Operating Procedures for the boilers are available and workers have been trained on their safe use.	7
Aug-17	Working Time	Regular Hours	Attendance records not accurate.	Ensure that the attendance records reflects the exact working time.	The factory reviewed the punching system to take in account workers who punch after 4 pm.	11
Aug-17	Working Time	Overtime	Excessive overtime.	Ensure that workers do not exceed the legal limit of overtime hours.		29
Aug-17	Freedom of Association and Collective Bargaining	Interference and Discrimination	Termination or non-renewal of workers employment contract due to union membership or activities. 32 workers including 11 union leaders were dismissed for participating in union activities.	Reinstate the 11 terminated union officers. Implement a freedom of association policy signed by top management. Train all relevant staff on freedom of association.	The factory is not intending to reinstate the workers.	7
<b>Assessment October 2016</b>						
Oct-16	Compensation	Social Security and Other Benefits	Employer contribution to OFATMA for maternity and health insurance.	Register with OFATMA for health and maternity insurance and pay employer contribution to OFATMA for maternity and health insurance.	The process of subscribing to OFATMA maternity and Health insurance is on going. The management is collecting workers' files.	

Oct-16	Occupational Safety and Health	Welfare Facilities	The factory does not have an appropriate eating area.	Provide eating area for all workers.	The factory arranged a covered area in front of each of their buildings with tables as an eating area.	
Oct-16	Compensation	Overtime Wages	Overtime hours are not reported in the payroll records for all workers.	Ensure that payroll records are accurate and reflect all the actual working hours. Compensate workers for overtime work.	The factory compensated workers for overtime accurately.	
Oct-16	Compensation	Overtime Wages	Night hours are not paid at 100% above the normal wage.	Ensure that the payroll records are accurate and reflect the real working time. Pay workers correctly for night hours after 6:00 PM.	Night shift are paid as requested by law.	
Oct-16	Compensation	Wage Information, Use and Deduction	Time records inconsistent with the payroll.	Ensure that payroll records are accurate and reflect all the actual working hours. Compensate workers for overtime work.	Factory compensated the workers accurately for overtime.	
Oct-16	Compensation	Paid Leave	Payment for sick leave is based on the minimum wage instead of the workers' average earnings.	Ensure that the payment for sick leaves is based on the workers' average earnings as stipulated by the labor code.	Payment for sick leave is based on the workers' average earnings.	
Oct-16	Compensation	Paid Leave	Payment for maternity leaves is based on the minimum wage instead of the workers' average earnings.	Ensure that the payment for maternity leave is based on the workers' average earnings as stipulated by the labor code.	Payment for maternity leave is based on the workers' average earnings.	
Oct-16	Compensation	Social Security and Other Benefits	Inaccurate and late payment for employer's contribution to ONA.	Ensure that the workers' contributions are accurately calculated and forwarded to ONA on time.	The factory decided to continue to apply their existing calculation principle for ONA payments.	
Oct-16	Compensation	Social Security and Other Benefits	Inaccurate and late submission of workers' contribution to ONA.	Ensure that the workers' contributions are accurately calculated and forwarded to ONA on time.	The factory decided to continue to apply their existing calculation principle for ONA payments.	
Oct-16	Compensation	Social Security and Other Benefits	Inaccurate payment of employer's contribution for work related accident insurance.	Ensure that the employer's contributions for work related-accident insurance are accurately calculated and sent to OFATMA		

Oct-16	Compensation	Social Security and Other Benefits	The factory is not registered with OFATMA for maternity and health insurance.	Complete the registration process with OFATMA to ensure maternity and health insurance services for all workers.	The process of subscribing to OFATMA maternity and Health insurance is on going. The management is collecting workers' files.	
Oct-16	Occupational Safety and Health	Chemicals and Hazardous Substances	Unidentified chemical containers observed in the workplace.	Ensure that all chemical containers are identified and stored safely.	All chemical containers have been identified and stored safely.	
Oct-16	Occupational Safety and Health	Chemicals and Hazardous Substances	MSDS not available for all chemicals used in the workplace.	Ensure that MSDS are available within the chemical room.	MSDS have been made available within the chemical room.	
Oct-16	Occupational Safety and Health	Chemicals and Hazardous Substances	No actions taken to assess, monitor, prevent and limit workers' exposure to chemicals and hazardous substances.	Maintain records for OSH self-assessments. Limit access of workers to chemicals in the workplace. Train and assign staff to record workers' exposure to hazardous chemicals and substances.	Management identified departments throughout the plant where workers may be vulnerable to excessive exposure to chemicals. The onsite doctor has been assigned to train workers and record workers' exposure to hazardous chemicals and substances. New fans have been installed and more will be added to improve ventilation.	
Oct-16	Occupational Safety and Health	Chemicals and Hazardous Substances	Several workers in the washing room and spot cleaning area were not using the PPE provided.	Provide safety training to workers using chemicals and hazardous substances and maintain adequate training records.	The factory provides PPE to all workers as needed and are implementing measures to ensure proper use of PPEs. Workers are also being trained on the regular use of PPE. The factory has also purchased extra PPE to be available in the boiler and generator room in addition to the regular equipment available.	
Oct-16	Occupational Safety and Health	Chemicals and Hazardous Substances	Washing facilities and cleansing materials are not available in all areas where chemicals are used or stored.	Provide washing facilities and cleansing materials near all areas where chemicals or hazardous materials are used or stored.	Eye wash stations have been installed in the suggested areas.	

Oct-16	Occupational Safety and Health	Worker Protection	The quantity of personal protective equipment available in the mechanic shop was not sufficient for all the workers in this section.	Provide personal protective equipment to all workers, as needed. Conduct awareness training to reinforce safe working practices.	Additional PPE have been provided in the mechanic shop. The factory provides PPE to all workers as needed and are implementing measures to ensure proper use of PPEs. Workers are also being trained on the use of PPE.	
Oct-16	Occupational Safety and Health	Worker Protection	Several workers were not using the protective devices attached to their machines or the PPE provided to them.	Provide training to ensure that workers are aware of safe working practices and follow them accordingly. Maintain records of all training sessions.	Management regularly makes safety announcements through the factory's notification system to remind workers about safety procedures. Several training sessions has been organized.	
Oct-16	Occupational Safety and Health	Worker Protection	Several sewing machines did not have eye, pulley or belt guards nor finger guards.	Ensure that the system to monitor the availability of machine guards is operational and effective. Liaise with the head mechanic to ensure that the guards are replaced on time.	Meetings have been organized with the mechanics and production managers to strengthen the monitoring system. Additional training will also be provided to workers.	
Oct-16	Occupational Safety and Health	Worker Protection	Exposed wires were observed in the compressor room in Building 30.	Establish an effective OSH management system. Ensure electrical wires, switches and plugs are properly installed, grounded, and maintained.	This exposed wires in the compressor room have been fixed.	
Oct-16	Occupational Safety and Health	Working Environment	Workplace temperatures exceeded the BW recommended limit of 30C.	Maintain a maximum temperature of 30C for all sections.	New fans have been installed and non-functioning exhaust fans have been repaired. The factory also purchased additional fans to have them available for backup when repairs are needed.	
Oct-16	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets for women.	Comply with the Haitian labor code regarding the total number of toilets.	The factory has repeatedly asked SONAPI for this since they are renting the buildings from SONAPI. No waiting lines are seen in front of toilets.	

Oct-16	Occupational Safety and Health	Health Services and First Aid	No annual medical checks provided to workers within the first three months of hiring.	Ensure that medical checks are provided to workers within the first three months of hiring.	Since February 2017, the factory has employed an additional permanent doctor and a nurse. The newly hired doctor will be in charge of this requirement.	
Oct-16	Occupational Safety and Health	Health Services and First Aid	Workers who are exposed to work-related hazards have not received periodic free health checks.	Ensure that workers who are exposed to work-related hazards receive free periodic health checks.	Since February 2017, the factory has employed an additional permanent doctor and a nurse. The newly hired doctor is in charge of this requirement.	
Oct-16	Occupational Safety and Health	Health Services and First Aid	No annual medical checks were provided to workers.	Provide free annual medical checks for workers. Follow-up with OFATMA to ensure that they either provide this service or refer the factory to another organization that can provide free medical checks.	Since February 2017, the factory has employed an additional permanent doctor and a nurse. The newly hired doctor is in charge of this requirement.	
Oct-16	Occupational Safety and Health	Health Services and First Aid	Insufficient medical staff.	Comply with the Haitian labor code regarding the employment of on site medical staff.	The factory has increased the number of medical staff.	
Oct-16	Occupational Safety and Health	Emergency Preparedness	Several fire extinguishers were missing, obstructed or without identification signs.	Replace dysfunctional alarms. Test and inspect alarm systems on monthly basis.	The fire alarm system was replaced. A smoke alarm system has been ordered installed.	
Oct-16	Occupational Safety and Health	Emergency Preparedness	No regular fire drills.	Conduct a minimum of two emergency drills per year.	Minimum of two emergency drills per year done.	
Oct-16	Working Time	Regular Hours	Attendance records do not always reflect the actual hours for workers on an incentive scheme in the sewing department.	Ensure that the attendance records reflect the exact working time	The factory technician has finalized the system changes to reflect the accurate overtime which be reflected on the May payroll payment.	
Oct-16	Working Time	Overtime	The factory does not have prior authorization from the Department of Labor for working at night.	Obtain a valid authorization from the Department of Labor before working at night.	Valid authorization obtained.	
Oct-16	Working Time	Overtime	Workers in some sections worked beyond 80 hours of overtime during a 3-month period.	Comply with the Labor Code by limiting overtime to 80 hours during a 3-month period.	Human resource officers received a training on labor law. Management will ensure that law is applied accordingly.	



Oct-16	Working Time	Overtime	The factory does not have prior authorization from the Department of Labor for working on Sundays.	Obtain valid authorization from the Department of Labor before working on Sundays.	Valid authorization obtained.	
Oct-16	Working Time	Overtime	The factory does not have prior authorization from the Department of Labor for working overtime.	Obtain valid authorization from the Department of Labor before working overtime.	Valid authorization obtained.	

**BETTER WORK HAITI - 16TH SYNTHESIS REPORT**



**Factory:** Interamerican Woven S.A. APH  
**Location:** Port-Au-Prince  
**Number of workers:** 590  
**Date of BW registration:** Jan-16  
**Date of last two Better Work assessments:** Jul-17 Apr-16

**Advisory and Training Services**

10-Oct-17 PICC meeting to discuss Industrial Relations issues.  
 14-Nov-17 Worker's interview and collects of information on the use of ATM in the factory. Meeting with HR manager to review the improvement plan. Factory tour with the compliance officer to review remediation efforts.  
 15-Nov-17 Chemicals management Industry Seminar  
 8-Dec-17 Human resources management training  
 9-Dec-17 Human resources management training  
 26-Jan-18 PICC meeting to review progress during the cycle and set new goals. Separate meetings with Human Resources Manager and Compliance Officer. Factory tour.  
 28-Feb-18 Review the Improvement plan and chemicals safety action plan. PICC meeting. Definition of the matrix of key OSH responsibilities

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDATION EFFORTS	MONTHS
<b>Assessment June 2017</b>						
Jul-17	<b>Compensation</b>	<b>Paid Leave</b>	Inaccurate payment for legally mandated holidays.	Adjust payroll system to ensure that payment for legally mandated holidays comply with legal requirements.		10
Jul-17	<b>Compensation</b>	<b>Paid Leave</b>	Inaccurate payment for weekly rest days.	Adjust payroll system to ensure that payment for weekly rest days comply with legal requirements.		10
Jul-17	<b>Compensation</b>	<b>Paid Leave</b>	Inaccurate payment for sick leave.	Adjust payroll system to ensure that payment for sick leave is accurate.	Management has made changes in the payroll. Payments for sick leave are based on workers' average earnings.	10
Jul-17	<b>Compensation</b>	<b>Paid Leave</b>	Inaccurate payment for maternity leave.	Adjust payroll system to ensure that payments for maternity leave are accurate.	Payments for maternity leave are based on workers' average earning.	10
Jul-17	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	Inaccurate calculation of employer contributions to ONA.	Ensure that ONA payments are based on the base salary instead of worker's average earnings.		10
Jul-17	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	Inaccurate calculation of workers' contributions to ONA.	Ensure that ONA payments are based on the base salary instead of worker's average earnings.		10

Jul-17	Compensation	Social Security and Other Benefits	Employer contributions to OFATMA for work-related accident insurance are based on the minimum wage.	Ensure that contributions to OFATMA for work-related accident insurance are based on the base salary		10
Jul-17	Compensation	Social Security and Other Benefits	Inaccurate calculation of employer contribution to OFATMA for maternity and health insurance.	Collect and forward 3 percent of worker's base salary.		10
Jul-17	Compensation	Social Security and Other Benefits	Inaccurate calculation of worker's contribution to OFATMA for maternity and health insurance.	Ensure that 3 percent of worker's base salary are collected and forwarded to OFATMA for maternity and health insurance.		10
Jul-17	Occupational Safety and Health	Worker Protection	Missing machine guards.	Maintain an inventory of guards installed on machines. Ensure that proper guards are installed on all machines.	All the required safety guards have been installed and the mechanical department is responsible of maintaining a weekly inventory.	10
Jul-17	Occupational Safety and Health	Emergency Preparedness	The factory's basement, which served as a fabric warehouse did not have fire detection and alarm systems.	Install fire detection and alarm systems in the basement.	A fire detection system has been installed.	10
Jul-17	Occupational Safety and Health	Emergency Preparedness	The factory's basement, which served as a fabric warehouse did not have any fire-fighting equipment.	Provide fire fighting equipment in the basement.	Fire fighting equipment have been provided in the basement.	10
Jul-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Inadequate personal protective equipment.	Provide additional training to workers in the spot cleaning area on the use of PPE.	Training on PPE has been conducted and workers are regularly using the protective masks.	10
Assessment June 2017						
May-16	Compensation	Social Security and Other Benefits	Employer contribution to ONA	Ensure that ONA payments are based on the base salary instead of worker's average earnings.		
May-17	Compensation	Social Security and Other Benefits	Collecting and forwarding workers' contributions for social insurance funds to ONA	Ensure that ONA payments are based on the base salary instead of worker's average earnings.		
May-17	Contracts and Human Resources	Employment Contracts	Internal work rules	Review the factory's internal work rules to ensure they comply with the legal requirements.	The internal work rules were modified and now comply with legal requirements.	
May-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Ensure that all the required MSDS are available.	All the required MSDS are available.	

May-17	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	Washing facilities or cleansing materials in the event of chemical exposure	Install adequate washing facilities.	Washing facilities or cleansing materials in the event of chemical exposure are available.	
May-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	Onsite medical facilities and staff.	Hire additional medical staff.	The factory now has a sufficient number of onsite medical facilities and staff.	

**BETTER WORK HAITI - 16TH SYNTHESIS REPORT**



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

**Advisory and Training Services**

12-Nov-17 PICC training  
 18-Jan-18 Meeting with the compliance team to introduce them to the BW portal and update the improvement plan. PICC meetings to discuss the committee workplan.  
 2-Mar-18 Discussion management systems requirements with the compliance team. PICC meeting to discuss OSH issues.

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDATION EFFORTS	MONTHS
<b>Assessment April 2018</b>						
Oct-17	Compensation	Social Security and Other Benefits	Late ONA payment. Holiday pay is not included in ONA deductions.	Comply with the law on ONA payments.	All payments are included in the calculation of ONA except overtime.	18
Oct-17	Compensation	Social Security and Other Benefits	Late ONA payment. Holiday pay is not included in ONA deductions.	Pay the ONA payment accordingly.	All payments are included in the calculation of ONA except overtime.	18
Oct-17	Compensation	Social Security and Other Benefits	No registration to OFATMA for maternity and health insurance	Register to OFATMA for maternity and health insurance		18
Oct-17	Compensation	Social Security and Other Benefits	No registration to OFATMA for maternity and health insurance	Register for OFATMA for maternity and health insurance		18
Oct-17	Occupational Safety and Health	OSH Management Systems	The existing policy has not been signed by top management.	Have the OSH policy signed by top management.	The OSH policy is signed by top management.	6
Oct-17	Occupational Safety and Health	Chemicals and Hazardous Substances	The inventory of chemicals and hazardous substances used in the workplace is not regularly updated	Keep an updated inventory of chemicals and hazardous substances used in the workplace.	The factory keeps an inventory of chemical substances used in the workplace	18
Oct-17	Occupational Safety and Health	Worker Protection	Several standing workers were not provided with foot rests or shock absorbing mats.	Provide foot rests or shock absorbing mats to standing workers.	The factory equipped all inspection tables with footrests. All standing workers have been trained about their usage.	18

Oct-17	Occupational Safety and Health	Working Environment	Temperature exceeds the recommended 30C.	Ensure that the temperature level, inside the workplace is under 30C.		18
Oct-17	Occupational Safety and Health	Health Services and First Aid	The factory does not provide workers with proper health checks within the first three months of hiring.	Ensure that workers receive proper health checks within the first three months of hiring		18
Oct-17	Occupational Safety and Health	Health Services and First Aid	The factory does not provide workers with proper annual health checks.	Ensure that all workers received an annual medical check. Document properly all the evidences of annual checks provided.		6
Oct-17	Occupational Safety and Health	Health Services and First Aid	Insufficient medical staff	Ensure to have a permanent onsite medical service with at least, 1 nurse and 2 doctor's visits per week.	The factory plans to have 1 doctor's visit per week. Negotiations are in progress.	18
Oct-17	Occupational Safety and Health	Health Services and First Aid	No systematic medical checks for exposed to work related hazards.	Ensure to systematic medical checks for workers exposed to work related hazards.	The factory has a contract with a private medical service provider and regularly sends workers for medical checks.	6
Oct-17	Occupational Safety and Health	Emergency Preparedness	The current evacuation plan in the fabric warehouse has not been updated to indicate the actual escape routes.	Update the evacuation plan in the fabric warehouse		6
Nov-16	Compensation	Social Security and Other Benefits	Late ONA payments and incorrect calculation	Ensure the timely payment of the employer's contribution to ONA.	The employer contributes 6 % of workers' base salaries to ONA on a monthly basis.	
<b>Assessment April 2018</b>						
Nov-16	Compensation	Social Security and Other Benefits	Late ONA payment and incorrect calculation	Ensure that ONA's payment is on time meaning that payment of the current month should be paid within the first 10 working days of the following month.	The employer contributes 6 % of workers' base salaries to ONA on a monthly basis.	

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

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



Nov-16	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	The factory does not conduct medical checks for newly hired workers within the first three months of employment.	Ensure to perform medical checks for newly hired workers within the first three months of employment.	All the workers that have more than two months have received their medical checks. The factory keeps a log to record the workers who received their yearly medical checks.	
--------	---------------------------------------	--------------------------------------	--	---	--	--

**BETTER WORK HAITI - 16TH SYNTHESIS REPORT**



**Factory:** Modas Bu II S.A.  
**Location:** Port-au-Prince  
**Number of workers:** 850  
**Date of BW registration:** 14-Aug-13  
**Date of last two Better Work assessments:** May-16 Apr-17

**Advisory and Training Services**

6-Oct-17 Meeting with management to review progress made on various OSH issues and the issue of verbal abuse. Meeting with union and workers on the verbal abuse issue. Factory tour.  
 31-Oct-17 PICC Meeting to discuss the water quality issue and the integration of the union members into the committee.  
 14-Nov-17 Labor Law Training  
 1-Feb-18 Meeting with HR Manager to revise pending improvement issue related to OFATMA. Factory tour with HR and Compliance manager. PICC Meeting to revise the progress made during the cycle and self diagnose potential new issues.  
 21-Feb-18 Meeting with MBI management and OFATMA representatives to discuss the implementation of the maternity and health insurance and related compliance requirements.  
 15-Mar-18 Meeting with the compliance team to review the results of factory self-assessment. Factory tour with compliance manager and OSH committee members.

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDATION EFFORTS	MONTHS
<b>Assessment April 2017</b>						
Apr-17	Compensation	Paid Leave	Payment for weekly rest days.	Ensure that the weekly rest day payment is correct.	The factory revised its payroll procedure and the weekly rest days payment is now based on the average salary.	12
Apr-17	Compensation	Paid Leave	Payment for legally mandated holidays.	Revise payroll procedures to ensure compliance with legal requirements	The factory revised its payment procedures to ensure compliance with legal requirements.	12
Apr-17	Compensation	Social Security and Other Benefits	Collecting and forwarding workers' contributions for social insurance funds to	Revise payroll procedures to ensure compliance with legal requirements	The factory revised its payroll procedures to ensure compliance with legal requirements. ONA payment is now done based on base salary.	12
Apr-17	Compensation	Social Security and Other Benefits	Employer contribution to ONA.	Revise payroll procedures to ensure compliance with legal requirements	The factory revised its payroll procedures to ensure compliance with legal requirements. ONA payment is now done based on base salary.	12

Apr-17	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	Employer contribution to OFATMA for maternity and health insurance. Collecting and forwarding of workers' contributions to OFATMA.	Registered with OFATMA for the maternity and health insurance.	Management completed the registration process to OFATMA.	12
Apr-17	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	Collecting and forwarding of workers' contributions to OFATMA.	Registered with OFATMA for the maternity and health insurance.	Management completed the registration process to OFATMA.	12
Apr-17	<b>Contract and Human Resources</b>	<b>Dialogue, Discipline and Disputes</b>	Bullying, harassment or humiliating treatment of workers.	Provide training to both Haitian and foreign supervisors on the verbal abuse policy	The factory conducted training for both Haitian and foreign supervisors on the verbal abuse policy. Training was also provided to workers.	20
Apr-17	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	Labeling of chemicals and hazardous substances.	Conduct awareness training for all workers handling chemicals. A system should be put in place to avoid recurrence.	The factory labeled all the chemicals containers and provided training to all workers using chemicals.	48
Apr-17	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Ensure that all required chemical safety data sheets for all chemicals and hazardous substances are available in the workplace.	Chemical safety data sheets for all chemicals and hazardous substances are available in the workplace.	48
Apr-17	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	Assessing, monitoring, preventing and/or limiting workers' exposure to hazardous substances.	Assess, monitor, prevent and/or limit workers' exposure to hazardous substances.	The factory regularly assesses and monitors workers' exposure to hazardous substances.	12
Apr-17	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	Washing facilities or cleansing materials in the event of chemical exposure were not available in all areas where workers use chemicals.	Provide adequate washing facilities or cleansing materials in the event of chemical exposure.	Washing facilities or cleansing materials in the event of chemical exposure are available.	48
Apr-17	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	Training workers to use the firefighting equipment	The factory should train additional workers in fire fighting.	The factory trained additional workers in fire fighting. Based on the current number of workers, the factory is in compliance with the requirements.	12
Apr-17	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	Some firefighting equipment were not properly maintained.	Ensure that all firefighting equipment are properly maintained and inspected.	The compliance officer regularly verifies the firefighting equipment.	12

Apr-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	Annual medical checks for workers.	Increase doctor's visit frequency to 3 visits a week and have doctors perform medical checks.	The factory hired a doctor who conducts the medical checks on a regular basis.	48
Apr-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	No medical checks are provided to workers within the first three months of hiring.	Increase doctor's visit frequency to 3 visits a week and have doctors perform medical checks.	The factory hired a doctor who conducts the medical checks on a regular basis.	12
Apr-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	The factory does not provide free health checks to workers who have been exposed to work related hazards.	Increase doctor's visit frequency to 3 visits a week and have doctors perform medical checks.	The factory hired a doctor who conducts the medical checks on a regular basis.	48
Apr-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	The factory has only 2 nurses. To comply with the Haitian Labor Code, the factory should have a permanent onsite medical service, with at least 5 nurses and 3 doctors' visits each week.	Hire 2 additional nurses and increase doctor's visit frequency to 3 times a week.	The factory hired a doctor who visits the factory 3 times per week.	48
Apr-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	The employer did not ensure that there were a sufficient number of readily accessible first aid boxes/supplies in the workplace.	Ensure that all the first aid boxes/supplies in the workplace are readily accessible .	All the first aid boxes/supplies in the workplace are readily accessible .	12
Apr-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	Insufficient first-aid training for workers.	Provide first-aid training for 10% of workers.		12
Apr-17	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	Insufficient number of toilets.	Increase the number of toilets.		12
Apr-17	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	Insufficient capacity of eating area.	Increase the capacity of the eating area.		12
Apr-17	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	Workers using chemicals are not provided with personal protective clothing and equipment.	Worker using chemicals should be provided with personal protective clothing and equipment.	All workers using chemicals are provided with personal protective clothing and equipment.	48
Apr-17	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	Shock absorbing mats are missing for standing workers.	Provide all standing workers with shock absorbing mats	All standing workers are provided with shock absorbing mats	12
Apr-17	<b>Occupational Safety and Health</b>	<b>Working Environment</b>	Workplace temperature and/or ventilation is no adequate.	Ensure that workplace temperature and/or ventilation comply with recommended limits.		48

Apr-17	<b>Working Time</b>	<b>Overtime</b>	Limits on overtime hours worked.	Monitor and limit the number of overtime hours performed.	The factory is monitoring the number of overtime hours performed to ensure that workers do not exceed 80 hours per trimester.	24
Apr-17	<b>Working Time</b>	<b>Regular Hours</b>	Daily break periods.	Review the internal policies regarding break for pregnant women	The factory reviewed the internal policies regarding break for pregnant women. Also all pregnant women were informed of this new policy.	12
<b>Assessment May 2016</b>						
May-16	<b>Freedom of Association and Collective Bargaining</b>	<b>Freedom to Associate</b>	Termination of union representatives.	Reinstate the worker(s). Awareness on freedom of association (FOA) to be done for foreign supervisors and managers. Inform workers about the freedom of association policy.	The factory developed an FOA policy that was communicated to workers. Also, industrial relations training was provided to both Haitian and foreign supervisors.	21
May-16	<b>Freedom of Association and Collective Bargaining</b>	<b>Interference and Discrimination</b>	Freedom to form and join a union.	Awareness on freedom of association to be done for foreign supervisors and managers. Inform workers about the freedom of association policy.	The factory developed an FOA policy that was communicated to workers. Also industrial relations training was provided to both Haitian and foreign supervisors.	21
May-16	<b>Compensation</b>	<b>Wage Information, Use and Deduction</b>	Time records were inconsistent with the payroll.	Keep accurate payroll records.	The attendance system was reviewed with the service provider.	
May-16	<b>Compensation</b>	<b>Paid Leave</b>	The factory pays sick leave to workers. However, the payment for sick leave is based on the minimum wage and not on the workers' average earnings.	Ensure that the payment of sick leave is accurate.	Management implemented a new procedure to calculate average earnings based on the last 3 payrolls and ensure that sick leave payment is accurate.	
May-16	<b>Compensation</b>	<b>Paid Leave</b>	The payment for maternity leave for piece rate workers is based on the minimum wage and not on the workers' average earnings.	Ensure that the payment of maternity leave is accurate.	Management implemented a new procedure to calculate average earnings based on the last 3 payrolls and ensure that maternity leave payment is accurate.	

May-16	<b>Contract and Human Resources</b>	<b>Employment Contracts</b>	The factory's working hours in the internal work rules are different than the reality. Management did not send a letter to MAST to announce the actual change in the internal rules.	Update internal work rules with the actual working hours and inform MAST.	Talks have been initiated with the company lawyer in order to make the changes.	
May-16	<b>Contract and Human Resources</b>	<b>Dialogue, Discipline and Disputes</b>	Workers explained that supervisors sometimes yell at them and utter insults when they are not satisfied with something workers do.	Awareness and training to be done for foreign supervisors and managers.	Management conducted training for Haitian and foreign supervisors on this topic.	
May-16	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	EAs observed several unlabeled containers of chemicals such as thinner.	Awareness to be done for all workers and production officers regarding chemical handling discussions and assign clear responsibility for this issue.	The factory labeled all the chemicals containers and provided training to all workers using chemicals.	36
May-16	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	The factory had MSDS for all but one chemical product found in the mechanic shop without MSDS.	Post MSDS where needed.	MSDS have been posted in the relevant areas. Training was provided for workers on the use of chemicals.	36
May-16	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	No washing materials were installed inside or near the mechanics shop where chemicals were also found.	Add eye wash bottles where needed.	Eye washing bottles were provided in the relevant areas.	36
May-16	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	No earplugs were found in the generator room.	Provide new earplugs in generator area.	New earplugs have been provided in the generator area.	36
May-16	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	No evidence of training for workers on PPE use provided.	Train workers on the effective use of PPE.		36
May-16	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	Electrical wires are not properly installed.	Electrical maintenance needs to be improved.	Electrical maintenance was improved throughout the factories.	
May-16	<b>Occupational Safety and Health</b>	<b>Working Environment</b>	The temperature is over the recommended level of 30C in building 53.	Ensure workplace temperature is compliant in all sections.		36
May-16	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	EAs did not find any soap in the workplace at the time of the assessment.	Ensure that soap is readily available in the workplace.		36

May-16	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	The water quality test provided by the factory mentioned that the water was not good.	Implement new procedure for water test.	A new procedure has been implemented to address this issue. Water tanks are cleaned every 2 weeks and frequent maintenance is being conducted for the filtration system.	
May-16	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	No medical checks are provided to workers within the first three months of hiring.	Increase doctor's visit frequency to 3 visits a week and have doctors perform medical checks.	Management has increased the number of weekly doctor's visits, as advised. However, the doctor has not started to perform medical checks yet.	
May-16	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	The factory does not provide free health checks to workers who have been exposed to work related hazards.	Increase doctor's visit frequency to 3 visits a week and have doctors perform medical checks.	Management has increased the number of weekly doctor's visits, as advised. However, the doctor has not started to perform medical checks yet.	36
May-16	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	The factory has only 2 nurses. To comply with the Haitian Labor Code, the factory should have a permanent onsite medical service, with at least 5 nurses and 3 doctors' visits each week.	Hire 2 additional nurses and increase doctor's visit frequency to 3 times a week.		36
May-16	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	During the factory tour, EAs found one exit locked in building 53.	Ensure that all exits remain unlocked during working hours.	All exits are unlocked during working time.	36
May-16	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	No regular fire drills were conducted in building 52.	Conduct at least 2 fire drills per year.	The factory performed the required fire drills and has a schedule for the upcoming one.	36
May-16	<b>Working Time</b>	<b>Regular Hours</b>	Working time records do not reflect the actual hours worked.	Keep accurate and detailed working time records.	From January 2017, the factory changed its regular work hours to 7am to 4pm including a one hour lunch break for all workers. The attendance system was also adjusted to reflect this change.	

May-16	<b>Working Time</b>	<b>Overtime</b>	12 out of 40 verified attendance records showed that those workers had worked beyond 80 hours of overtime during a 3-month period.	Monitor and limit number of overtime hours performed to the legal limits of 80 hours per trimester.		
--------	---------------------	-----------------	--	---	--	--



**BETTER WORK HAITI - 16TH SYNTHESIS REPORT**



**Factory:** MGA Haiti S.A  
**Location:** Port-au-Prince  
**Number of workers:** 960  
**Date of BW registration:** Oct-09  
**Date of last two Better Work assessments:** Jun-17 Jun-16

**Advisory and Training Activities**

17-Nov-17 Meeting with the compliance team to review pending points in the improvement plan. Factory tour with compliance officer and a union representative. Interview with boiler  
 25-Jan-18 Discussion on the functioning of the PICC. Factory tour to conduct hazard hunt.  
 08-Mar-18 Discussion on OSH findings and remediation process with the new compliance officer. Joint Factory tour. Verification of remediation from previous visit. Meeting on the PICC elections with union representatives ( SOTA-BO & CFOH) and compliance officer.

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDATION EFFORTS	MONTHS
<b>Assessment June 2017</b>						
Jun-17	Compensation	Premium Pay	Inaccurate compensation for weekly rest days.	Compensate for weekly rest days according to the law.	The company now calculates compensation for weekly rest day based on average earnings.	10
Jun-17	Compensation	Paid Leave	Inaccurate payment for legally mandated holidays.	Adjust payroll system to ensure that the payments for legally mandated holidays are accurate.	The company now calculates compensation for legally mandated holidays based on average earnings.	10
Jun-17	Compensation	Social Security and Other Benefits	The factory has not registered with OFATMA for maternity and health insurance services.	Register and forward employer's contribution to OFATMA for maternity and health insurance services.		10
Jun-17	Compensation	Social Security and Other Benefits	The factory has not registered with OFATMA for maternity and health insurance services.	Register and forward workers' contribution to OFATMA for maternity and health insurance services.		10
Jun-17	Compensation	Social Security and Other Benefits	Inaccurate calculation of employer's contributions to ONA.	Ensure that ONA payments are based on the basic salary instead of worker's minimum wages.	The calculation method has been adjusted to comply with this requirement.	35
Jun-17	Compensation	Social Security and Other Benefits	Inaccurate calculation of worker's contributions for social insurance funds to ONA.	Ensure that ONA payment is based on the basic salary instead of workers' minimum wages.	The calculation method has been adjusted to comply with this requirement.	35

Jun-17	<b>Contract and Human Resources</b>	<b>Employment Contracts</b>	Inadequate employment contracts.	Review the employment contract template to ensure compliance with legal requirements and include key employment terms and conditions such as hours of work, the nature of the work to be performed, the amount of pay and benefits.	The employment contract has been revised with the suggested terms and specifications.	10
Jun-17	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	Unlabeled chemicals.	Label all containers, conduct training for workers on the safe handling of chemical substances and assign someone to regularly monitor this issue.	Training has been conducted for workers in the spot cleaning area.	10
Jun-17	<b>Occupational Safety and Health</b>	<b>OSH Management Systems</b>	Inactive OSH committee.	Ensure that the factory has an active OSH committee, which meets at least once a month.	All committee members have been trained. Also, the factory has hired a new compliance office and resumed monthly occupational safety and health assessments.	10
Jun-17	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	Missing fire extinguishers.	Increase the frequency of inspections of fire extinguishers in all buildings. Replace missing fire extinguishers. Keep a stock of additional fire extinguishers for use in case of an emergency.	The missing fire extinguishers have been replaced and an inspection sheet is available.	83
Jun-17	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	Obstructed evacuation aisles with fabric bundles.	Ensure that the aisles between the sewing lines remain unobstructed during working hours, including overtime.	The maintenance department has already begun to trace the floor of the factory so that more space can be found for the evacuation lines	10
Jun-17	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	Inadequate PPE for workers using thinner in the spot cleaning area.	Provide appropriate PPE and conduct training for all workers using chemicals.	Training was conducted for workers in the spot cleaning area and the mechanic shop. PPE has also been provided.	10
Jun-17	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	Inadequate electrical maintenance.	Ensure that all electrical wires and equipment are properly installed and maintained.	The factory had started to install electrical cord covers.	10
Jun-17	<b>Occupational Safety and Health</b>	<b>Working Environment</b>	Excessive workplace temperature.	Improve the temperature levels in the sewing and pressing sections.	Temperature in building 17 was observed to be at 28C during factory tour by factory thermometer	83

Jun-17	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	Insufficient number of toilets	Fix non-functioning toilets and add more toilets to comply with the legal requirements.	The industrial park from which the factory rents its buildings has already begun the construction of additional toilets.	95
Jun-17	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	Capacity of the eating area is insufficient to accommodate all the workers	Increase the capacity of the eating area.	The factory has built another cafeteria.	95
Jun-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	No health checks conducted for workers exposed to work-related hazards.	Provide at least two medical checks per year to workers who have been exposed to work-related hazards.	The factory has contracted Para Clinical Examinations to conduct regular health checks for all workers. The administration will continue the process every 6 months to avoid that this issue repeats again.	10
Jun-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	Annual medical checks not conducted for all workers.	Ensure that annual medical checks are provided for all workers.		10
Jun-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	Insufficient onsite medical facilities and staff.	Hire additional medical staff to include at least 4 nurses and 3 doctor's visits per week.		95
<b>Assessment June 2016</b>						
Jun-16	<b>Compensation</b>	<b>Minimum Wages/Piece Rate Wages</b>	Minimum wage	Pay at least the legal minimum wage to all security guards.	Adjustment has been made in the last payroll.	
Jun-16	<b>Compensation</b>	<b>Overtime Wages</b>	Overtime wages	Pay security guards at least correctly for all ordinary overtime hours worked.	Adjustment has been made in the last payroll.	
Jun-16	<b>Compensation</b>	<b>Wage Information, Use and Deduction</b>	Inaccurate payroll	Have an accurate and detailed payroll system.	The time punching system has been fixed.	
Jun-16	<b>Compensation</b>	<b>Paid Leave</b>	Payment for sick leave.	Pay sick leave based on the workers' average earnings.	Several meetings were held with the HR Department and accountants to apply the changed sick leave payments.	
Jun-16	<b>Compensation</b>	<b>Paid Leave</b>	Payment for maternity leave .	Pay maternity leave based on the worker's average earnings.	The payroll system has been updated accordingly.	
Jun-16	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	Employer contribution to ONA.	Employer must forward their contributions to ONA.	Meeting was held with the HR and accountant staff and adjustments are expected to follow.	

Jun-16	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	Collecting and forwarding workers' contribution to ONA.	Employer must collect and forward workers' contributions to ONA.	Meeting was held with the HR and accountant staff and adjustments are expected to follow.	
Jun-16	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	Lack of electrical maintenance.	Improve electrical maintenance.	Electrical maintenance was improved and all boxes have been covered.	
Jun-16	<b>Occupational Safety and Health</b>	<b>Working Environment</b>	Workplace Temperature	Ensure workplace temperature is compliant.	Protective sheets have been added under the metal roof, additional fans have been installed and non-functioning exhaust fans have been fixed.	
Jun-16	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	Insufficient number of toilets	Fix non-functioning toilets and add more toilets in order to be compliant with the legal requirements.	All non-functioning toilets have been fixed. The management has requested SONAPI to add more toilets.	
Jun-16	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	Washing facilities and soap.	Regularly monitor availability of soap in restrooms and provide soap when needed.	Soap has been provided in the restrooms.	
Jun-16	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	Capacity of the eating area insufficient to accommodate all the workers	Increase the capacity of the eating area.	The factory provided additional seats and tables to accommodate more workers.	
Jun-16	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	Insufficient onsite medical staff	Have at least 4 nurses and at least 3 doctor's visits per week.	The factory signed a contract with DASH to provide two doctor's visits per week.	
Jun-16	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	Several missing fire extinguishers were observed in the plant.	Add fire extinguishers where needed. Maintain all extinguishers on a regular basis.	Adequate fire extinguishers have been provided.	
Jun-16	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	Fire drills	Conduct at least 2 fire drills per year.	A fire drill was conducted in August 2016 and another one in January 2017.	
Jun-16	<b>Working Time</b>	<b>Overtime</b>	Authorization from MAST to work overtime.	Obtain authorization to work overtime from MAST.	A request to work overtime was sent to MAST in September 2016.	
Jun-16	<b>Working Time</b>	<b>Regular Hours</b>	The working hours mentioned in the attendance records do not reflect the hours actually worked.	Keep accurate working time records.	Attendance records accurately reflect the hours worked.	

**BETTER WORK HAITI - 16TH SYNTHESIS REPORT**



**Factory:** PACIFIC SPORTS HAITI S.A.  
**Location:** Port-au-Prince  
**Number of workers:** 1868  
**Date of BW registration:** Nov-09  
**Date of last two Better Work assessments:** Jul-17 Jun-16

Advisory and Training Services

19-Oct-17 Advisory visit on the fundamental criteria of a grievance mechanism and how to develop a grievance mechanism policy.  
 25-Jan-18 Meeting with the PICC committee. Review of improvement plan. Factory tour  
 22-Feb-18 Discuss the training plan. Review the improvement plan. PICC meeting. Factory tour

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDIATION EFFORTS	MONTHS
<b>Assessment July 2017</b>						
Jul-17	Compensation	Paid Leave	Inaccurate payments for legally mandated holidays.	Adjust the payroll system to ensure that the payments for legally mandated holidays are based on worker's average earnings.	The factory has made adjustments to their payroll system for holiday payments.	8
Jul-17	Compensation	Social Security and Other Benefits	The factory has not registered with OFATMA for maternity and health insurance.	Register with OFATMA for maternity and health insurance services.	Registration with OFATMA for maternity and health insurance services is in process.	8
Jul-17	Compensation	Social Security and Other Benefits	The factory has not registered with OFATMA for maternity and health insurance.	Register with OFATMA for maternity and health insurance services. Collect and forward workers' contributions to OFATMA.	Registration with OFATMA is in process for maternity and health insurance services.	8
Jul-17	Occupational Safety and Health	Emergency Preparedness	Obstructed access to fire fighting equipment.	Assign someone to inspect fire extinguishers on a regular basis. Do a root cause analysis to find out why access to several fire extinguishers are obstructed. Provide training to workers on the use of fire fighting equipment.	The factory has reorganized the workplace and also assigned 2 persons to inspect fire extinguishers at the workplace.	41
Jul-17	Occupational Safety and Health	Emergency Preparedness	80 percent of the evacuation aisles in the fabric warehouse of Building 25 are blocked by trolleys.	Ensure that the aisles remain unobstructed.	The factory recently rented another building to store fabrics and other materials.	8
Jul-17	Occupational Safety and Health	Emergency Preparedness	Inadequate maintenance of electrical equipment	Identify an appropriate place to store cardboard boxes. Ensure that access to electrical cabinets remain unobstructed and free from flammable sources		8

Jul-17	Occupational Safety and Health	Health Services and First Aid	Insufficient number of annual medical checks for workers	Ensure that annual medical checks are provided to all workers	85% of the workers have received their annual medical checks	8
Jul-17	Occupational Safety and Health	Health Services and First Aid	Insufficient onsite medical staff	Hire additional medical staff to include at least 8 nurses and 3 doctor's visits per week.	The management is in the process of recruiting 2 additional nurses.	35
Jul-17	Occupational Safety and Health	Working Environment	Workplace temperatures exceeded the recommended limit of 30 C	Improve the temperature levels in the workplace.		58
Jul-17	Occupational Safety and Health	Working Environment	Noise level in the sewing section of Building 8 exceeded 90 dB.	Identify the source of excessive noise and explore possibilities to address this hazard. If noise levels can not be reduced at source, provide adequate PPE to workers in the noted area.		8
<b>Assessment June 2016</b>						
Jun-16	Compensation	Wage Information, Use and Deduction	Inaccurate Payroll	Ensure consistency in between all time and payment-related records.	Adjustments were made during the last payroll to ensure that records match.	
Jun-16	Compensation	Social Security and Other Benefits	Employer contribution to ONA	Ensure on time and accurate payments to ONA.	Review of the payroll for the month of April revealed the employer's contribution to ONA is based on the basic salary.	
Jun-16	Compensation	Social Security and Other Benefits	Collecting and forward workers' contribution to ONA	Ensure on time and accurate payments to ONA.	Several meetings were held to inform the workforce about the payroll adjustments. Workers' contribution will be based on the basic salary. Review of the payroll for the month of April revealed the employer's contribution to ONA is based on the basic salary.	
Jun-16	Occupational Safety and Health	Chemicals and Hazardous Substances	Chemicals hazardous substances not properly labeled	Identify all secondary chemical containers in the workplace.	All containers have been identified.	
Jun-16	Occupational Safety and Health	Working Environment	Insufficient light levels in the workplace.	Ensure that lighting levels are adequate.	New lighting installations were made in Buildings 7 and 27.	
Jun-16	Compensation	Paid Leave	Payment for sick leaves is based on the minimum wage instead of the workers' average daily earnings.	Adjust payroll system to ensure that sick leave payment is accurate	Change already made in the payroll payment. Sick leaves are now based on the workers' average daily earnings.	

Jun-16	<b>Compensation</b>	<b>Paid Leave</b>	Payment for maternity leaves is based on the minimum wage instead of the workers' average daily earnings	Adjust payroll system to ensure that maternity leave payment is accurate	The payroll system is updated and payments for maternity leave are based on workers' average earnings	
Jun-16	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	No inventory of chemicals available	Maintain an inventory of chemicals and hazardous substances used in the workplace	A system was put in place to ensure that the inventory is readily available in the workplace	
Jun-16	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	One eye wash station is not working.	Ensure that all eye wash stations are functional.	The eye wash station was fixed and is working correctly	
Jun-16	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	Electrical maintenance	Ensure that all electrical boxes are properly safe guarded, at all times.	Electrical maintenance was improved and the necessary correction was made during the assessment	
Jun-16	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	Lack of electrical maintenance	Post warning signs on all electrical boxes, and do the verification through internal audits on a regular basis.	Warning signs were posted as advised.	
Jun-16	<b>Occupational Safety and Health</b>	<b>Working Environment</b>	Temperatures exceed BW's recommended limit of 30 C.	Ensure that the workplace temperature does not exceed 30 C.	Management is currently testing a cooling system using a sprinkler and metal sheets to address this issue.	
Jun-16	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	Insufficient number of toilets	Ensure that number of toilets is compliant with the legal requirements	16 additional toilets were added we have sufficient toilets for men and women this is completed	
Jun-16	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	Insufficient onsite medical staff	To comply with the Haitian Labor Code, the factory should have at least 8 nurses	The management is currently recruiting 2 additional nurses	
Jun-16	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	Fire extinguishers obstructed and missing the identification tag.	Ensure that all fire extinguishers are unobstructed and are provided with proper tags	This issue was corrected during the assessment. All fire extinguishers have the necessary tags and are freely accessible	
Jun-16	<b>Working Time</b>	<b>Overtime</b>	No proof of authorization from the Ministry of Labor to work overtime.	Obtain an authorization from MAST before performing overtime work	Management has requested an authorization for overtime work from MAST	

**BETTER WORK HAITI - 16TH SYNTHESIS REPORT**



**Factory:** Palm Apparel S.A.  
**Location:** Port-au-Prince  
**Number of workers:** 1592  
**Date of BW registration:** Nov-09  
**Date of last two Better Work:** Jul-16                      Aug-17

Advisory and Training Activities

29-Sep-17                      Advisory visit and meeting with the Compliance Manager on payment for legally mandated holidays, and ONA and OFATMA for maternity and health insurance.  
 30-Sep-17                      PICC training  
 15-Nov-17                      Industry Seminar on chemical management  
 24-Nov-17                      IR Training  
 27-Oct-17                      Advisory visit  
 2-Feb-18                      PICC meeting to review the role and responsibilities of the committee members and complete the self-diagnosis.  
 21-Mar-18                      Overview of key functionalities of the supplier portal with the compliance team. Review the improvement plan. PICC meeting. Factory tour

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDIATION EFFORTS	MONTHS
<b>Assessment August 2017</b>						
Aug-17	Compensation	Premium Pay	Inaccurate payment for regular hours worked on legally mandated holidays.	Adjust payroll system to ensure that the payment for regular hours worked on legally mandated holidays is based on workers' average earning.	The payment for legally mandated holidays is now based on average earnings.	13
Aug-17	Compensation	Paid Leave	Inaccurate payment for legally mandated holidays.	Ensure that the payment for legally mandated holidays is based on workers' average earnings.	The payment for legally mandated holidays is now based on average earnings.	13
Aug-17	Compensation	Social Security and Other Benefits	Inaccurate calculation of employer's contributions to ONA.	Revise payroll procedure to ensure that ONA payments are based on the basic salary instead of the workers' minimum wage.		84
Aug-17	Compensation	Social Security and Other Benefits	Inaccurate calculation of workers' contributions for social insurance to ONA.	Ensure that ONA payments are based on the basic salary instead of workers' average earnings.		84



Aug-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Inadequate labeling of chemicals and hazardous substances in the mechanic room.	Label all chemical containers, provide training on the safe handling of chemical substances and also monitor the labeling of containers.		13
Aug-17	Occupational Safety and Health	OSH Management Systems	Workplace temperatures in the packing, sewing and inspection sections of Buildings 2, 3 and 4 exceeded the recommended limits of 30 C	Maintain temperature levels below 30 C in the noted areas.		13
Aug-17	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets.	Ensure that the factory has at least 21 functioning toilets for men and 65 functioning toilets for women.		13
Aug-17	Occupational Safety and Health	Welfare Facilities	The eating area at Thor can only accommodate a small percentage of the workforce.	Ensure that the eating area can accommodate all workers.		13
Aug-17	Occupational Safety and Health	Health Services and First Aid	Insufficient medical staff.	Hire additional medical staff to include at least 7 nurses and 3 doctor's visit per week.		13
Aug-17	Occupational Safety and Health	Emergency Preparedness	Several escape routes were obstructed by boxes of finished goods on floors 2 and 5.	Ensure that the evacuation aisles remain unobstructed during working hours, including overtime.		78
Aug-17	Working Time	Overtime	No authorization has been obtained from the Department of Labour for overtime work.	Obtain authorization from MAST before working overtime.	New regulation eliminated this requirement.	18
Aug-17	Compensation	Social Security and Other Benefits	The factory does not forward the required employer's contribution to OFATMA for maternity and health insurance.	Collect and forward 3 percent of the workers' basic salary to OFATMA for maternity and health insurance.	The factory pays 2 percent of worker's average earnings to OFATMA for maternity and health insurance.	13
Aug-17	Compensation	Social Security and Other Benefits	The factory does not collect and forward the required workers contributions to OFATMA for maternity and health insurance.	Ensure that 3 percent of workers' basic salary is collected and forwarded to OFATMA for maternity and health insurance.	The factory collects and forwards 2 percent of worker's average earnings to OFATMA for maternity and health insurance. All workers are registered.	13

Jul-16	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	One exit door was locked and another exit led to another room instead of an outdoor space.	Ensure that each building has at least 2 exits that are unlocked at all times.	A security guard was stationed near the previously locked gate, so that it can be kept unlocked now at all times.	
Jul-16	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	Electrical maintenance is not adequate.	Limit electrical hazards at the workplace.	This issue was corrected during the assessment.	
Jul-16	<b>Working Time</b>	<b>Overtime</b>	Time records showed that workers worked up to 84 hours of overtime in a trimester.	Limit overtime work to a maximum of 80 for a 3 month period.	Management said that they have stopped working on Sundays in order to reduce the amount of overtime.	
Jul-16	<b>Working Time</b>	<b>Overtime</b>	No authorization to work on Sundays obtained from the Department of Labor.	Obtain prior authorizations from MAST for work on sundays.	Authorization has been requested from MAST.	
Jul-16	<b>Working Time</b>	<b>Overtime</b>	No authorization for overtime work obtained from the Department of Labor.	Obtain prior authorizations from MAST for overtime.	Authorization has been requested from MAST.	
Jul-16	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	Employer contribution to ONA.	ONA payments should be accurately calculated.		
Jul-16	<b>Contract and Human Resources</b>	<b>Dialogue, Discipline and Disputes</b>	Disciplinary measures not compliant with the law.	Ensure that termination is made in line with legal requirements.	The dismissed workers have been reinstated.	
Jul-16	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	Inadequate PPE were provided to workers	Provide adequate PPE to the workers in the spot cleaning area.	Management provided PPE as needed.	
Jul-16	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	No soap was available in the toilets at the time of the visit.	Increase the supply of soap in the toilets and ensure regular verification.	Management increased the supply of soap and are trying to control wasteful habits.	
Jul-16	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	Drinking water	Maintain an adequate supply of drinking water for all workers.	The management increased the supply of water.	

**BETTER WORK HAITI - 16TH SYNTHESIS REPORT**



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

**Advisory and Training Services**

20-Oct-17 PICC Meeting on Grievance mechanism in relation to the self-diagnostic process.  
 15-Nov-17 Chemicals management training  
 16-Nov-17 Meeting with plant manager, operations manager and HR Manager to review the last assessment report and discuss of the remediation actions and deadlines.  
 30-Nov-17 Industrial Relations Training  
 01-Feb-18 Overview of key functionalities of the supplier portal with the new HR manager. Improvement plan exercices with PICC members. Coaching on the preparation of the progres report with HR manager.  
 20-Mar-18 PICC meeting. Review the report on dismissal with management. Review of improvement plan. Factory tour. Meeting with union president.

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDATION EFFORTS	MONTHS
<b>Assessment August 2017</b>						
Aug-17	Compensation	Social Security and Other Benefits	Late and inaccurate payment of employer contributions for ONA.	Submit ONA payments on time and calculate this amount based on average earnings instead of the minimum wage.		19
Aug-17	Compensation	Social Security and Other Benefits	Late and inaccurate payment of workers contributions for ONA.	Ensure that workers' contribution are collected and forwarded to ONA on time and calculate this amount based on base salary instead of the minimum wage.		19
Aug-17	Compensation	Social Security and Other Benefits	No evidence of reigistartion for work related accident insurance available.	Ensure employer contribution to OFATMA for work-related accident insurance is 3 percent of workers' base salary.		19
Aug-17	Compensation	Social Security and Other Benefits	Payment of employer's contribution for the OFATMA for the maternity and health insurance is innaccurate.	Forward 3 percent of workers' base salary to OFATMA for maternity and health insurance.		19
Aug-17	Compensation	Social Security and Other Benefits	Payment of workers' contribution for the OFATMA for the maternity and health insurance is innaccurate.	Collect and forward 3 percent of workers' base salary to OFATMA for maternity and health insurance.		19

Aug-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Inadequate storage of chemicals and hazardous substances.	Define a storage place for each chemical. Ensure that the chemicals are properly labelled. Ensure the written instructions on MSDS are available in the storage place.	The chemical concerned, Blow out, has been removed from the supervisor's room.	
Aug-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Missing chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Have someone in charge for collecting MSDS when new chemicals are used. Posting the MSDS in appropriate places. Conduct regular checks about the MSDS.		
Aug-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Missing washing facilities or cleansing materials in the event of chemical exposure.	Provide adequate washing facilities and cleansing materials in the event of exposure to hazardous chemicals.	The missing water bottles have been replaced.	19
Aug-17	Occupational Safety and Health	Worker Protection	Workers using chemicals without appropriate mask.	Provide all necessary personal protective clothing and equipment. Conduct training for all workers. Prevent and monitor workers exposition to chemicals.		
Aug-17	Occupational Safety and Health	Working Environment	The temperature level exceed BW recommended limit of 30 C.	Improve the temperature levels in the noted areas.		23
Aug-17	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets.	Comply with the required number of toilets as per the law.		10
Aug-17	Occupational Safety and Health	Health Services and First Aid	Medical checks are not systematically provided for workers upon hiring.	Ensure medical checks are provided to new workers within the first first three months of hiring.	The factory has established a plan to provide systematic health checks to new workers within the first first three months of hiring.	77
Aug-17	Occupational Safety and Health	Health Services and First Aid	Annual medical checks not systematically provided for workers.	Ensure annual medical checks are provided to all workers.	The factory has established a plan to provide annual medical checks to all workers.	77
Aug-17	Occupational Safety and Health	Health Services and First Aid	insufficient medical staff.	Hire additional medical staff, at least 8 nurses and 3 doctor's visit per week.		77

Aug-17	Occupational Safety and Health	Emergency Preparedness	Firefighting equipment not properly maintained.	Ensure that the workplace has adequate fire-fighting equipment. Assign someone to monitor firefighting equipments. Keep an inspection record.		10
Aug-17	Occupational Safety and Health	Emergency Preparedness	Escape routes blocked by boxes of finished goods and other materials.	Conduct a root cause analysis. Have someone in charge of verifying and ensuring that the aisles in the sewing lines remain unobstructed during working hours, including overtime.		29
Aug-17	Occupational Safety and Health	Emergency Preparedness	Electrical box obstructed by flammable materials such as fabric cartons in the workplace.	Ensure that flammable materials are safely stored.	Checklist has been updated to ensure that electrical boxes remain unobstructed.	19
Aug-17	Working Time	Regular Hours	Regular daily and/or weekly working hours exceed the legal limit.	Ensure regular daily and weekly working hours do not exceed the legal limit.		10
Aug-17	Working Time	Regular Hours	No authorization from the Department of Labour before working at night.	Obtain authorization from the Department of Labour before working at night.		10
Aug-17	Working Time	Overtime	The factory exceeded the legal limits on overtime hours worked in the packing section.	Respect the legal overtime limit.		10
Aug-17	Working Time	Overtime	No authorization for performing overtime was provided by management during the time of the assessment.	Request authorization of MAST to perform overtime work.		10
Aug-17	Working Time	Overtime	Management was unable to share any form of consent from the workers to perform overtime.	Ensure that overtime work is voluntary.		10
<b>Assessment October 2016</b>						
Oct-16	Compensation	Paid Leave	Workers are not compensated for their breastfeeding breaks.	Ensure that all nursing women benefit from the breastfeeding break as required by the law.	There is a new policy in place so that a report of nursing woman is issued to the department of accounting to ensure that all nursing women benefit from the breastfeeding break as required by the law.	

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

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

**BETTER WORK HAITI - 16TH SYNTHESIS REPORT**



**Factory:** Quality Sewing Manufacturing S.A  
**Location:** Port-au-Prince  
**Number of workers:** 456  
**Date of registration:** Oct-09  
**Date of last two Better Work** Apr-16 Jul-17

Advisory and Training Activities

29-Sep-17 PICC discussion on good practices for following up after the meetings  
 27-Oct-17 PICC meeting on communication inside the workplace. Diagnosis of challenges. Definition of new strategies.  
 17-Nov-17 PICC meeting to introduce new members, review of the achievements of the year and setting of new goals for 2018.  
 24-Nov-17 Industrial Relations Training  
 16-Jan-18 Assist with the preparation of the first progress report. Review of the improvement Plan. PICC Meeting to update the self diagnosis.  
 8-Mar-18 Review of the improvement Plan with the general manager. PICC Meeting to review the OSH issues.

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDATION EFFORTS	MONTHS
<b>Assessment July 2017</b>						
Jul-17	<b>Freedom of Association and Collective Bargaining</b>	<b>Interference and Discrimination</b>	Attempt to interfere, manipulate or control the union.	Respect the right of workers to freely associate with or form a trade union.	The factory participated in a training on Industrial Relation with Better Work	9
Jul-17	<b>Freedom of Association and Collective Bargaining</b>	<b>Interference and Discrimination</b>	Termination or non renewal of worker's employment contract due to union membership or activities.	Respect the right of workers to freely associate with or form a trade union. Plan regular meetings with union members.	The factory participated in a training on Industrial Relation with Better Work	9
Jul-17	<b>Compensation</b>	<b>Wage Information, Use and Deduction</b>	Inaccurate compensation for regular working hours.	Ensure that the payroll records are accurate and reflect the exact working hours.	The factory is in the process of buying a new punching machine to ensure attendance is properly recorded.	9
Jul-17	<b>Compensation</b>	<b>Paid Leave</b>	Inaccurate payments for non-working holidays.	Pay for non-working holidays according to the Labor Code.		81
Jul-17	<b>Compensation</b>	<b>Paid Leave</b>	Inaccurate payments for weekly rest days.	Pay for weekly rest days according to the Labor Code.		81
Jul-17	<b>Compensation</b>	<b>Paid Leave</b>	Inaccurate payments for sick leaves.	Pay for sick leaves according to the Labor Code.	Sick leave is paid base on the average earnings.	81
Jul-17	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	Wrong calculation of ONA's contributions.	Calculate ONA contributions according to the Labor Code.		9
Jul-17	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	Wrong calculation of ONA's contributions.	Calculate ONA contributions according to the Labor Code.		9



Jul-17	Compensation	Social Security and Other Benefits	Inaccurate calculation of payments to OFATMA for work-related accident insurance.	Pay OFATMA for work-related accident insurance according to the Labor Code.		9
Jul-17	Compensation	Social Security and Other Benefits	Inaccurate calculation of payments to OFATMA for maternity and health insurance.	Pay OFATMA for maternity and health insurance according to the Labor Code.		9
Jul-17	Compensation	Social Security and Other Benefits	Inaccurate calculation of payments to OFATMA for maternity and health insurance.	Pay OFATMA for maternity and health insurance according to the Labor Code.		9
Jul-17	Contract and Human Resources	Employment Contracts	Inadequate enforcement of apprentice contracts.	Comply with the Labor Code and the factory's internal rules regarding apprentice contracts.	The factory is in the process of changing the template for apprentice contracts to comply with legal requirements.	9
Jul-17	Occupational Safety and Health	OSH Management Systems	No evidence of management conducting assessments of general occupational safety and health issues in the workplace.	Regularly assess OSH issues at the workplace. Create an OSH assessment template. Conduct regular assessments and maintain records.	The bipartite committee is in charge of performing OSH assessments on a weekly basis and to report the issues to management	81
Jul-17	Occupational Safety and Health	Chemicals and Hazardous Substances	No inventory of chemicals.	Keep an updated inventory for all chemicals used in the workplace.	The factory had an awareness session with his maintenance staff regarding this issue. An inventory of other chemicals bought and used is available	81
Jul-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Unidentified chemical containers.	Label all chemical containers used in the workplace.	Management trained the mechanic to label all containers and chemical such as thinner is now forbidden in the factory.	81
Jul-17	Occupational Safety and Health	Chemicals and Hazardous Substances	No MSDS' were posted for thinner in the Mechanical Workshop.	Post MSDS' where workers are using chemicals and hazardous substances.	The factory is no longer using thinner. MSDS is posted for all chemicals used in the mechanical shop.	81
Jul-17	Occupational Safety and Health	Worker Protection	No training provided to workers to properly use personal protective equipment and machines.	Train workers on the use of personal protective equipment.		81
Jul-17	Occupational Safety and Health	Worker Protection	More than 30 percent of all machines in the main building were missing pulley and eye guards.	All sewing machines should be properly equipped with the necessary safety guards.	The factory bought the required finger guards and is in the process of installing them. A purchase order has also been sent to replace the missing eye guards.	81

Jul-17	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	Electrical distribution boards were not well maintained.	Conduct regular maintenance of electrical equipment.	Electrical distribution boards have been securely mounted on walls.	9
Jul-17	<b>Occupational Safety and Health</b>	<b>Working Environment</b>	Excessive temperatures noted around the workplace.	Take appropriate measures to keep the workplace temperature under 30 C.	The factory replaced the defective fans and added four more fans in the production floor.	81
Jul-17	<b>Occupational Safety and Health</b>	<b>Working Environment</b>	Insufficient lighting in the workplace.	Ensure adequate lighting for the sewing, packing, and trimming sections.	The factory replaced the defective lights.	20
Jul-17	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	Insufficient number of toilets for workers.	Comply with the Labor Code regarding the number of toilets.		81
Jul-17	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	Drinking water provided for workers did not pass the safety test.	Provide safe drinking water to workers. Immediately follow up on this issue and conduct another test to verify the water quality.	The factory has started to perform monthly tests to monitor the drinking water quality. A new sample was sent to the testing laboratory, which indicated that the water was safe for drinking.	9
Jul-17	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	The factory has an eating area that can only accommodate 25 percent of its workforce.	Provide an eating area that can accommodate all the workers	The factory has expanded the eating area and is in the process of buying benches to rearrange the space to accommodate more workers.	81
Jul-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	No medical checks conducted for newly hired workers within the first three months of employment.	Arrange medical checks for newly hired workers within the first three months of employment.		55
Jul-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	Annual medical checks were not provided to all workers in the last 12 months.	Arrange annual medical checks for all workers.		53
Jul-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	Insufficient medical staff.	Comply with the Labor Code regarding the total number of onsite medical staff.		81
Jul-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	Assessors found 1 empty first aid box.	Ensure that the first aid boxes are properly maintained and equipped. Provide a sufficient number of first aid boxes throughout the plant.	The factory bought products for the floor's first aid box.	53
Jul-17	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	No fire alarm system was observed in the second building.	Install a fire alarm system in the second building.		23

Jul-17	Occupational Safety and Health	Emergency Preparedness	Unmarked and missing fire extinguishers.	Provide missing fire extinguishers and mark all extinguishers.	All fire extinguishers have been marked and missing ones added.	23
Jul-17	Occupational Safety and Health	Emergency Preparedness	No evacuation plans were posted in the second building	Post an evacuation plan in the second building.		41
Jul-17	Occupational Safety and Health	Emergency Preparedness	Last fire drill was conducted in July 2015.	Conduct two fire drills a year.	A drill was conducted in August 2017.	65
Jul-17	Working Time	Regular Hours	Inaccurate attendance records.	Ensure that attendance records are accurate and reflect the exact working time.	The factory is in the process of buying a new punching machine to ensure attendance is properly recorded.	9
Jul-17	Working Time	Overtime	Excessive overtime.	Ensure that overtime hours do not exceed the legal limit of 80 hours per trimester.		65
Jul-17	Working Time	Overtime	No prior authorization obtained from the Department of Labor for working overtime.	Obtain prior authorization from the Department of Labor for overtime work.		71
<b>Assessment April 2016</b>						
Apr-16	Compensation	Wage Information, Use and Deduction	Time records were inconsistent with the payroll.	Keep accurate time and payroll records.		70
Apr-16	Compensation	Paid Leave	Workers are incorrectly paid for weekly rest days.	Correctly pay for weekly rest days.		70
Apr-16	Compensation	Paid Leave	The payment for sick leaves is inaccurate.	Correctly pay for sick leaves.		70
Apr-16	Compensation	Paid Leave	The payment for maternity leaves is inaccurate.	Correctly pay for maternity leaves.		70
Apr-16	Contract and Human Resources	Termination	During a review of terminated files, EAs observed several files without any notice of termination or prior warnings.	Ensure that each dismissed worker's file includes a notice of termination.	Management ensured proper documentation of termination	70
Apr-16	Occupational Safety and Health	OSH Management Systems	Management does not record work-related accidents and does not submit any records to OFATMA on a monthly basis.	Record work-related accidents and send these records to OFATMA on a monthly basis.	Management records work-related accidents to OFATMA	70
Apr-16	Occupational Safety and Health	Chemicals and Hazardous Substances	Lack of updated chemical inventory list.	Ensure that the chemical inventory list is up to date.	Factory keeps a chemical inventory list	70
Apr-16	Occupational Safety and Health	Chemicals and Hazardous Substances	Several containers of chemical substances were missing labels.	Ensure that all containers of chemicals and hazardous substances are properly labeled.	Instructions were provided to the maintenance team to label all the chemical substances used in the workplace	70

Apr-16	Occupational Safety and Health	Chemicals and Hazardous Substances	With the exception of the main spot cleaning station, all the other spot cleaning areas did not have any MSDS.	Provide MSDS in all the other spot cleaning areas where hexane is also used.	Factory provided MSDS in the mechanic shop where hazardous substances are used	70
Apr-16	Occupational Safety and Health	Chemicals and Hazardous Substances	No eye wash stations and cleansing materials near the spot cleaning areas nor the chemical storage area.	Provide eye wash stations and cleansing materials near the spot cleaning and the chemical storage areas.		16
Apr-16	Occupational Safety and Health	Worker Protection	Lack of adequate PPEs in some sections.	Provide all workers with the required PPE.		70
Apr-16	Occupational Safety and Health	Worker Protection	No adequate seats were available for workers in the washing area.	Ensure that the factory is compliant with ergonomic requirements.	Seats with back rest are provided to workers in the washing area	70
Apr-16	Occupational Safety and Health	Worker Protection	Machines of all types were missing belt and pulley guards. Bartack machines were missing eye guards.	Install appropriate safety guards on all the machines.		10
Apr-16	Occupational Safety and Health	Working Environment	The workplace was inadequately lit.	Ensure that the light levels are compliant in all the sections.		6
Apr-16	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets.	Provide required number of toilets for women.		
Apr-16	Occupational Safety and Health	Welfare Facilities	The factory has an eating area that only accommodates 20 percent of its workforce at once.	Increase the capacity of the eating area.		
Apr-16	Occupational Safety and Health	Health Services and First Aid	Insufficient number of medical staff.	Employ at least 2 nurses and provide 3 doctor's visits per week.		
Apr-16	Occupational Safety and Health	Health Services and First Aid	EAs noticed one empty first aid box and another that was poorly equipped.	Provide sufficiently equipped first aid boxes around the workplace.		42
Apr-16	Occupational Safety and Health	Health Services and First Aid	No medical checks have been provided.	Provide free annual medical checks to all workers.		42
Apr-16	Occupational Safety and Health	Emergency Preparedness	Lack of adequate fire fighting equipment.	Ensure that all the fire extinguishers are properly identified and functional.	Fire extinguishers are checked on a monthly basis by an external supplier	6
Apr-16	Occupational Safety and Health	Emergency Preparedness	No evacuation plans were posted in the workplace.	Install an evacuation plan in both the main and cutting buildings.		30
Apr-16	Occupational Safety and Health	Emergency Preparedness	One exit and some aisles were obstructed due to loading activities.	Ensure that aisles and exits remain unobstructed at all times.		30
Apr-16	Occupational Safety and Health	Emergency Preparedness	No regular fire drills.	Conduct at least two emergency drills per year.		54

Apr-16	<b>Working Time</b>	<b>Regular Hours</b>	Attendance records are not accurate.	Ensure that the attendance records are accurate.		54
Apr-16	<b>Working Time</b>	<b>Overtime</b>	Excessive overtime in some sections.	Maintain overtime hours within the limit set by law (not more than 80 hours per trimester).		54
Apr-16	<b>Working Time</b>	<b>Overtime</b>	No current authorization for overtime work.	Obtain prior authorization from the Department of Labour for overtime work.	The factory requests authorization from the Department of Labour prior to working overtime.	60
Apr-16	<b>Working Time</b>	<b>Leave</b>	Breastfeeding break is not offered to all eligible workers.	Inform workers about the breastfeeding break policy.	Pregnant women signed the breastfeeding policy	60

**BETTER WORK HAITI - 16TH SYNTHESIS REPORT**



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

**Advisory and Training Activities**

29-Sep-17 Discussion with MAST, the Compliance and HR managers on the labor training.  
 06-Nov-17 Verification of remediated non-compliance issues regarding HR and compensation issues). Discussion about the new law on working hours. Factory tour with OSH team.  
 30-Jan-18 Better Work service model introduction to the new compliance manager. Factory tour to validate the remediation of OSH compliance issues. Bipartite meeting to validate the remediation of HR and compensation compliance issues  
 26-Feb-18 Root cause analysis with OSH committee. Discussion on the priorities for the new cycle with HR and compliance manager. Self-diagnosis of existing grievance mechanisms and the communication issues with the PICC committee.  
 11-Apr-18 Discussion on compensation and social security benefits with the compliance and HR managers. Review of improvement plan. Factory tour.  
 12-Apr-18 OSH training with OSH committee. PICC meeting

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDATION EFFORTS	MONTHS
<b>Assessment July 2017</b>						
Jul-17	<b>Compensation</b>	<b>Paid Leave</b>	Incorrect basis used (minimum wage) to calculate legally mandated holiday payments for workers entitled to incentives.	Employees who receive incentives for piece rate work should be paid based on average earnings for legally mandated holidays.	Payment of holidays has been adjusted accordingly.	15
Jul-17	<b>Compensation</b>	<b>Paid Leave</b>	Incorrect basis used (minimum wage) to calculate weekly days payments for workers entitled to incentives.	Employees who receive incentives for piece rate work should be paid for weekly rest days based on average earnings.	Payment of weekly rest day has been adjusted accordingly	15
Jul-17	<b>Compensation</b>	<b>Paid Leave</b>	Incorrect basis (minimum wage) used to calculate sick for workers entitled to incentives.	Employees who receive incentives for piece rate work should be paid for sick leaves based on average earnings.	Payment of sick leave has been adjusted accordingly	15
Jul-17	<b>Compensation</b>	<b>Paid Leave</b>	Incorrect basis used to calculate maternity leave payments for workers entitled to incentives.	Employees who receive incentives for piece rate work should be compensated for maternity leaves based on average earnings.	Payment of maternity leave has been adjusted accordingly	15

Jul-17	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	Incorrect basis used to calculate the employer's contributions to ONA.	For workers entitled to incentive payments, the employer's contribution to ONA should be based on these workers' base salaries	Employer's contributions to ONA has been adjusted accordingly	15
Jul-17	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	Employer contributions to OFATMA.	Register for the maternity and health insurance service with OFATMA.	Company had meetings with OFATMA representatives in order to make sure that OFATMA services will be available to all workers.	3
Jul-17	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	Workers contributions to OFATMA.	Register for the maternity and health insurance service with OFATMA.	Company had meetings with OFATMA representatives in order to make sure that OFATMA services will be available to all workers.	3
Jul-17	<b>Contract and Human Resources</b>	<b>Employment Contracts</b>	Employment contracts' compliance with the labour code.	Company needs to review the employment status of all temporary workers and issue adequate contracts.	The company recategorized all temporary workers as regular workers. All the relevant workers have also signed new contracts and are now receiving the legally stipulated benefits for regular workers.	3
Jul-17	<b>Contract and Human Resources</b>	<b>Contracting Procedures</b>	Non-compliance with legal requirements for non-production workers (security guards)	Ensure overtime hours are within legal limits.		3
Jul-17	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	Unidentified and unlabeled chemical containers.	Properly maintain and store chemical products. Assign a person in charge of monitoring the chemical labeling process.	The factory marked various storage tanks for oil, gas and water. The mechanics and the factory Compliance officers are in charge of regularly monitoring the labeling process.	27
Jul-17	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	No MSDS' posted for chemicals in the spare mechanical parts warehouse in Module 1.	List the chemicals used and stored in the noted area and post the required MSDS. This process should be monitored regularly.	All MSDS' have been posted. The Compliance Team is conducting regular weekly audits to ensure that MSDS' are always available.	3
Jul-17	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	Non-functional eye wash station. No eye wash station in the mechanical spare parts warehouse.	Eye wash stations should be maintained properly.	Eye wash station was installed.	3
Jul-17	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	Workers in the pressing section were not using the protective ear plugs provided by the factory.	Training needed on regular PPE usage for both workers and supervisors.	PPE are provided to workers. Several trainings, warning letters and disciplinary actions, were implemented.	27

Jul-17	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	Several single needle machines were missing finger guards.	Install finger guards as required. Conduct regular inspections of safety guards on all machines.	This issue has been immediately addressed by installing finger guards as required.	3
Jul-17	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	No exit signs posted in warehouse 2.	Ensure that exit signs are posted above all exit doors.	Exit signs are posted above all exit doors.	3
Jul-17	<b>Occupational Safety and Health</b>	<b>Working Environment</b>	Workplace temperatures.	Ensure that the workplace temperature does not exceed a maximum of 30 C.	The factory has installed cooling systems in all the modules. Several non-functioning exhaust fans were repaired to ensure compliance with this point. Thermometers have been installed in each department to better monitor the temperature. Non-functioning parts of the cooling system are being repaired.	3
Jul-17	<b>Occupational Safety and Health</b>	<b>Working Environment</b>	Noise levels exceeded the recommended limit.	Ensure that the noise level does not exceed a maximum of 90 dB. Provide PPE training for both workers and supervisors. Ensure that PPE regulations are strictly applied in the noisy areas.	The employer monitors the noise levels and posted warning signs in the pressing area to encourage workers to use ear plugs. Noise warnings have also been posted in the factory's administration office to warn employees to reduce noise levels at the workplace.	27
Jul-17	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	Comply with the legal requirement for the number of toilets for men and women.	Provide more restrooms for men.	Based on the gender distribution in each unit, some of the women's restrooms were reallocated for men.	15
Jul-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	Insufficient number of nurses.	Hire more nurses.	The factory hired additional nurses.	3
Jul-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	Inadequate number of first aid boxes; some of the existing boxes are inaccessible.	First aid boxes should be easily accessible and provided throughout the workplace.	Additional first aid boxes have been installed in the main storage area.	3
Jul-17	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	Obstructed access to a fire alarm switch. No smoke detectors in the warehouse.	Ensure that all fire alarm switches are easily accessible. Install smoke detectors in the warehouse.	Smoke detectors have been installed in warehouses 1 and 2;	3
Jul-17	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	Unreliable fire extinguisher maintenance services.	Ensure that all fire extinguishers are adequately maintained.	All the fire extinguishers have been placed in their designated locations.	18



Jul-17	Occupational Safety and Health	Emergency Preparedness	An evacuation map was missing in washing section 1.	Provide evacuation maps throughout the factory.	Evacuation maps have been posted in all the different sections throughout the factory.	3
Jul-17	Occupational Safety and Health	OSH Management systems	Work-related accidents records were not submitted to OFATMA.	Submit accidents records to OFATMA on a monthly basis.	The factory submitted all accidents records to OFATMA. The compliance department is now in charge of ensuring that this is done on a monthly basis.	3
Jul-17	Working Time	Regular Hours	Multiple work schedules inconsistent with collective working agreements and the law.	Approval from MAST is needed for any changes related to working hours.	Company obtained an approval letter from MAST. All workers are informed of the new working hours.	3
Jul-17	Working Time	Overtime	Overtime limits	Ensure that overtime work does not exceed legal limits.		3
Jul-17	Working Time	Overtime	Unauthorized overtime work.	Obtain MAST's approval prior to performing overtime work.		3
<b>Assessment July 2016</b>						
Jul-16	Compensation	Paid Leave	Incorrect calculation of sick leave payments for piece rate workers.	Comply with Article 148 regarding the payment of sick leaves.	Payments have been adjusted accordingly.	
Jul-16	Compensation	Paid Leave	Incorrect calculation of maternity leave payments for piece rate workers	Adjust maternity leave payments.	Payments have been adjusted accordingly.	
Jul-16	Occupational Safety and Health	Worker Protection	Workers in the incinerator chambers were not provided with appropriate anti-heat and fire protective clothing.	Provide PPE to all workers and train them on the importance of their use.	Weekly training sessions on the use of PPE have been organized for supervisors. New procedures on PPE use have been implemented. Appropriate PPEs are now provided to all the workers who work in the incinerator chambers. Warning posters have also been put up.	
Jul-16	Occupational Safety and Health	Working Environment	Temperatures above recommended limites recorded in several sections throughout the workplace.	Limit workplace temperatures to a maximum of 30 C.		

Jul-16		<b>Working Environment</b>	Excessive noise levels.	Limit noise levels to a maximum of 90 dB.	The Compliance Team has requested the purchase of a noise level meter to regularly monitor noise levels around the workplace and address any related issues. They have posted safety warning signs around the pressing area to raise the workers' awareness on the use of ear plugs. The team has also advised the administration to reduce the music volume at the workplace.	
Jul-16	<b>Compensation</b>	<b>Paid Leave</b>	Incorrect calculation of legally mandated holiday payments.	Provide accurate payment for legally mandated holiday.		
Jul-16	<b>Compensation</b>	<b>Paid Leave</b>	Incorrect basis used (minimum wage) to calculate compensation for weekly rest days.	Provide accurate payment for weekly rest days.		
Jul-16	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	Incorrect calculation of ONA payments for workers receiving incentives.	Ensure ONA payment comply with the legal requirements.	The factory now correctly calculates all ONA payments.	
Jul-16	<b>Compensation</b>	<b>Chemicals and Hazardous Substances</b>	Unlabeled containers in Modules 1 and 2.	Implement new measures to ensure that the production supervisors and workers are aware of such compliance requirements. Monitor chemical use in the workplace. Assign a person in charge of chemical maintenance.	The factory implemented new measures to ensure that managers and supervisors follow the appropriate regulation on chemical usage. To monitor chemical usage, each building now has a person in charge of monitoring chemical use and storage. At the time of distribution, the responsible personnel must ensure that all containers are properly labeled. labeled with the factory	
Jul-16	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	EA observed an unidentified electrical box and exposed wiring in Module 1.	Post hazard signs on all electrical boxes and safeguard exposed wiring.	Electrical maintenance has been improved and all electrical boxes have the necessary warning signs.	
Jul-16	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	Insufficient number of toilets .	Repair the non-functioning toilets.	The park management of SONAPI has addressed this issue in buildings 3 and 4. More restrooms have been added and the factory is now in compliance with legal requirements.	

Jul-16	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	Unavailability of soap in the restrooms.	Ensure that soap is always available in all restrooms.	Soap has been made available in all the restrooms.	
Jul-16	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	Obstructed evacuation aisles in the stock room of Module 2.	Ensure that evacuation aisles remain unblocked at all times.	All aisles have been cleared.	
Jul-16	<b>Working Time</b>	<b>Overtime</b>	Limits for overtime work.	Ensure that overtime work does not exceed legal limits.	According to MAST and as per an authorization letter provided, the situation has been regularized as per legal requirements.	

**BETTER WORK HAITI - 16TH SYNTHESIS REPORT**



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

Apr-16

Advisory and Training activities

10-Dec-17 Advisory visit on a freedom of association policy. Verification of medical checks for workers. PICC meeting on the development of an action plan to keep aisles unobstructed.  
 26-Jan-18 Discussion on the PICC functioning with members of the bipartite committee. Factory tour to conduct a hazard hunt. Review of the improvement plan.  
 14-Mar-18 Review of the improvement plan and remediation efforts. Factory tour. Discussion about a recent industrial dispute.

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDATION EFFORTS	MONTHS
<b>Assessment May 2017</b>						
May-17	Compensation	Paid Leave	Payment for maternity leaves is based on the minimum wage instead of the worker's average daily earnings.	Adjust payroll system to ensure that maternity leave payment is accurate.	The changes have been made in the payroll system, payment for maternity leave is based on workers' average earnings as of June 2017.	72
May-17	Compensation	Paid Leave	Payment for sick leaves is based on the minimum wage instead of the workers' average daily earnings.	Adjust payroll system to ensure that sick leave payment is based on workers' average daily earnings.	The changes have been made in the payroll system, payment for maternity leave is based on workers' average earnings as of June 2017.	12
May-17	Compensation	Social Security and Other Benefits	The employer's contribution to ONA is based on the minimum wage.	Ensure on time and accurate payments to ONA. The employer should pay 6 percent of the workers' basic salary to ONA.	Efforts to remediate this finding are still in process. Management is in consultation with workers to present some sustainable solutions to ensure on time and accurate payments.	18
May-17	Compensation	Social Security and Other Benefits	The worker's contribution to ONA is based on the minimum wage.	Ensure on time and accurate payments to ONA. Workers should contribute 6 percent of their basic salary to ONA.	Efforts to remediate this finding are still in process. Management is in consultation with workers to present some sustainable solutions to ensure on time and accurate payments.	18

May-17	Compensation	Social Security and Other Benefits	Employer contribution to OFATMA for maternity and health insurance.	Collect and forward 3 per cent of worker's average earnings.	Efforts to remediate this finding are still in process. Management is in consultation with workers to present some sustainable solutions to ensure on time and accurate payments.	5
May-17	Compensation	Social Security and Other Benefits	Collect and forward worker's contribution to OFATMA for maternity and health insurance.	Ensure that 3 per cent of worker's average earnings collected and forwarded to OFATMA for maternity and health insurance.	Efforts to remediate this finding are still in process. Management is in consultation with workers to present some sustainable solutions to ensure on time and accurate payments.	5
May-17	Working Time	Overtime	Workers from packing, extra and utility worked up to 137 hours of overtime per trimester.	Monitor overtime hours worked in order to comply with the 80 hours allowed per trimester.		72
May-17	Working Time	Overtime	No authorization has yet been obtained from the Ministry of Labor to perform overtime.	Request authorization to work overtime from MAST	The factory received authorization to perform 1 hour of overtime per day until May 2018.	5
May-17	Occupational Safety and Health	Health Services and First Aid	The factory only has 2 nurses and 3 doctor's visits per week.	Factory should have at least 9 nurses.		72
May-17	Occupational Safety and Health	Health Services and First Aid	Medical Check for workers upon hiring.	Ensure that workers receive medical checks within their first three months of hiring.	All newly hired workers during the August 1st to October 18 2018 period have gone through medical evaluation by the onsite doctor.	5
May-17	Occupational Safety and Health	Health Services and First Aid	Annual medical checks for workers.	Ensure annual medical checks is provided to all workers.		72
May-17	Occupational Safety and Health	Health Services and First Aid	Health checks for workers who are exposed to work related hazards.	Provide medical checks at least twice a year to workers who have been exposed to work related hazard.	Workers exposed to work related hazard have received a medical check by the on site doctor.	5

May-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Labeling of chemicals and hazardous substances in spot cleaning area.	Label all containers and display posters on the labeling of chemicals substances. Provide training and identify a person in charge of monitoring.	All containers have been labeled, training have been done for the spot cleaning employees and factory has designated a person monitoring that all containers are labeled.	5
May-17	Occupational Safety and Health	Emergency Preparedness	Fire fighting equipment not installed in the trim warehouse on floor 8.	Install smoke detectors in the trim warehouse Identify areas that need additional smoke detectors, and designate a person in charge of the monthly audit.	Factory is in the process of obtaining pricing from several vendors and complete installations by May 2018.	5
May-17	Occupational Safety and Health	Emergency Preparedness	Emergency exit obstructed with fabric.	Create an action plan to ensure all the exits remain unblocked based on the root causes identified.	All emergency exits were observed to be opened and unobstructed during recent advisory visits.	5
May-17	Occupational Safety and Health	Working Environment	Workplace temperatures in the sewing, quality and pressing sections exceeded BW recommendation of 30 C.	Workplace temperatures should be maintained below 30 C.		48
May-17	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets.	Ensure that number of toilets is compliant with the legal requirements.		36
May-17	Occupational Safety and Health	Welfare Facilities	Hand washing facilities and adequate soap.	Ensure that soap is available at all times in the toilets.	Soap has been made available in all toilets.	5
May-17	Occupational Safety and Health	Welfare Facilities	Eating area is insufficient for the total number of workers in the factory.	Increase the capacity of the eating area to appropriate levels.		72
<b>Assessment April 2016</b>						
Apr-16	Compensation	Overtime Wages	Overtime hours worked on weekly rest days are not paid accurately.	Correctly pay for overtime worked on weekly rest days.	Management said that they stopped working on sundays in order to reduce the amount of overtime work.	
Apr-16	Compensation	Paid Leave	Payment for sick leave is inaccurate.	Payment for sick leaves should be based on worker's average earnings. Make the necessary adjustment in the payroll system for compliance.		

Apr-16	Compensation	Paid Leave	Payment for maternity leave is inaccurate.	Payment for maternity leaves should be based on worker's average earnings. Make the necessary adjustment in the payroll system for compliance.		
Apr-16	Compensation	Social Security and Other Benefits	The factory is late for ONA payments.	Ensure that the monthly ONA payments are made on time.		
Apr-16	Compensation	Social Security and Other Benefits	Collect and forward workers contribution to ONA	Ensure that the monthly ONA payments are made on time.		
Apr-16	Compensation	Social Security and Other Benefits	The factory's registration to OFATMA insurance is not completed.	Ensure that the OFATMA payments are made on time.	Payment for the 2015-2016 fiscal year have been made.	
Apr-16	Occupational Safety and Health	Worker Protection	Several workers were not using PPE.	Provide workers with appropriate PPE and train them on its use.	A vacuum system has been installed in the spot cleaning section.	
Apr-16	Occupational Safety and Health	Worker Protection	Several machines missing eye guards and belt guards.	Install safety guards on all the machines.	Safety guards were installed on all the machines.	
Apr-16	Occupational Safety and Health	Working Environment	The temperatures exceeded the BW recommended limit of 30 C.	Ensure that the workplace temperature levels are maintained within the recommended limit.	More fans have been installed to address this issue.	
Apr-16	Occupational Safety and Health	Working Environment	The workplace was inadequately lit.	Improve the level of lighting in the quality and packing sections.	The lights have been adjusted.	
Apr-16	Occupational Safety and Health	Welfare Facilities	The factory has insufficient number of toilets according to the law.	Provide 31 functioning toilets for men and 70 toilets for women in order to be compliant with the law.	The factory added 3 more toilets for men.	
Apr-16	Occupational Safety and Health	Welfare Facilities	The current eating area can only accommodate about one fourth of the workforce.	Increase the capacity of the eating area to accommodate all workers.		
Apr-16	Occupational Safety and Health	Health Services and First Aid	The factory only has two nurses and three doctor's visits a week.	Ensure that the factory has a permanent on site medical service with at least 9 nurses and a full-time operational clinic.		

Apr-16	Occupational Safety and Health	Health Services and First Aid	Insufficient number of workers received the annual medical checks.	Provide annual health checks for all workers.	The factory is working on a procedure that requires newly hired workers to systematically receive medical checks at the factory.	
Apr-16	Working Time	Overtime	Workers in several departments worked up to 90 hours of overtime during the reviewed trimester.	Reduce overtime hours as per the limit set by law for a trimester.	Management explained that they stopped working on Sundays to reduce overtime hours.	



**BETTER WORK HAITI - 16TH SYNTHESIS REPORT**



**Factory:** The Willbes Haitian II S.A.  
**Location:** Port-au-Prince  
**Number of workers:** 1446  
**Date of registration:** Aug-10  
**Date of last two Better Work assessments:** May-17 Jun-16

**Advisory and Training Services**

31-Oct-17 Meeting with management on Improvement plan update. Meeting with the OSH committee. Factory tour and self diagnosis.  
 08-Dec-17 HR management system training  
 28-Jan-18 Training on Heavy Load Lifting  
 20-Feb-18 Advisory visit on new union introductory meeting, progress report 2, Training needs of the OSH committee members  
 16-Mar-18 Discussion on management and trade union dialogue; priorities for next cycle; PICC election of workers' representatives  
 06-Apr-18 Industry seminar on BW Compliance Assessment Tool

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDIATION EFFORTS	MONTHS
<b>Assessment May 2017</b>						
May-17	Compensation	Paid Leave	Payments for non-working holidays are based on the minimum wage instead of average earnings.	Ensure that payments of non-working holidays as required by law	The payroll system has been changed, so that the non-working holidays are paid based on the average earnings.	11
May-17	Compensation	Paid Leave	Payments for weekly rest days are based on the minimum wage instead of average earnings.	Ensure that payments for weekly rest days are based on average earnings.	The payroll system has been changed so that the weekly rest days are paid based on the average earnings.	11
May-17	Compensation	Paid Leave	The payments for sick leaves are based on the minimum wage instead of average earnings.	Ensure that payments for sick leave are based on average earnings.	Payment system has been reviewed and all the necessary adjustments have been made. Sick leaves are paid based on average earnings.	22
May-17	Compensation	Social Security and Other Benefits	The factory calculates ONA contributions based on the minimum wage instead of the base salary.	Ensure that ONA contributions are based on the base salary.	The contribution to ONA for all Willbes factories is paid based on the workers' base salary.	11
May-17	Compensation	Social Security and Other Benefits	Workers' contributions to ONA are calculated based on the minimum wage instead of the base salary.	Ensure that ONA contributions are based on the base salary.	ONA contributions are based on the base salary. Facility properly collects and forwards workers' contributions to ONA.	11
May-17	Compensation	Social Security and Other Benefits	The factory does not pay the employer contribution to OFATMA for maternity and health insurance.	Register with OFATMA for maternity and health insurance.	The employer initiated the registration process with OFATMA by paying the company's contribution as of July 2017.	11

May-17	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	The factory does not collect and forward the workers' contribution to OFATMA for maternity and health insurance.	Register with OFATMA for maternity and health insurance.	The employer initiated the registration process with OFATMA by paying the company's contribution as of July 2017.	11
May-17	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	No updated inventory of chemicals and hazardous substances used in the workplace.	Keep an updated inventory of chemicals and hazardous substances used in the workplace.	The inventory logbook is now been maintained as recommended.	11
May-17	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	Unlabeled chemicals containers.	Label all containers of chemicals in Creole. Train mechanics on Occupational Safety and Health concerns.	Facility ensured to have all chemical containers properly labeled and identified in the local language.	11
May-17	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	Chemicals are not properly stored.	Ensure that chemicals are properly stored.	Facility ensured to have all chemical substances properly stored. Workers will be trained according to storage methods by Better Work.	11
May-17	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	No MSDS' were posted for chemicals stored in the chemical room.	Post MSDS' were chemicals are used. Ensure that they are clearly labeled.	All chemical substances were provided with the MSDS.	11
May-17	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	Documented evidence of actions taken by management to control and oversee workers' exposure to chemicals and hazardous substances were unavailable during the assessment.	Keep records of awareness training provided to workers. Post awareness messages in appropriate places throughout the workplace.		11
May-17	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	There was no eye wash station in the spot cleaning area of building 45.	Provide eye washing facilities where needed, especially in the spot cleaning areas.	Management installed an eye wash station in the spot cleaning room.	34
May-17	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	Workers using thinner were not wearing any protective masks.	Provide adequate masks to workers that are using chemicals. Provide safety training to exposed workers on the usage of protective equipment.	This practice was stopped immediately. All work related to chemical substances have been allocated to the spot cleaning area where workers are provided with the necessary PPE to perform their duties safely.	61
May-17	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	Several workers were not using the safety guards installed on their machines.	Ensure that all machines have their necessary guards. Train workers and supervisors on OSH matters.	All the machines have their necessary guards.	76
May-17	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	Several sewing machines are missing finger guards.	Ensure that all machines have their necessary guards	All single needle machines were provided with needle guards	76

May-17	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	Uncovered electrical boxes with exposed wires and cables and other electrical equipment improperly installed and stored in the packing and pressing sections of building 43.	Ensure proper maintenance of electrical equipment. Keep a log of weekly inspections.	All electrical boxes have been covered; this was previously lacking as a result of welding work in building 43 for the installation of the air cooling system.	76
May-17	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	Insufficient number of toilets	Comply with the law regarding the number of functioning toilets.	22 additional toilets have been added. The factory does not have plans to further increase the number of toilets. Building additional toilets would be hard due to the lack of space.	76
May-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	No systematic medical checks were arranged for workers exposed to work-related hazards.	Arrange a minimum of two medical checks per year for workers exposed to work-related hazards.	The factory has started conducting mandatory medical checks for all workers and are scheduled to finish the process in 4 months. Additional checks are being requested through OFATMA. Also, the factory changed the doctor's contract to full-time.	76
May-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	The factory does not offer systematic annual medical checks for all workers.	Arrange a minimum of one medical check per year for all workers.	The factory has started conducting mandatory medical checks for all workers and are scheduled to finish the process in 4 months. Additional checks are being requested through OFATMA. Also, the factory changed the doctor's contract to full-time.	76
May-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	Insufficient number of medical staff.	Have an appropriate number of medical staff according to the Haitian Labor Code.	Facility has an additional clinic on site. Management is making arrangements to increase the number of medical staff.	76
May-17	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	Several obstructed fire alarm switches were observed. Missing smoke detectors in several buildings.	Provide adequate fire fighting equipment. Install smoke detectors in buildings 41, 44 and 46.	The employer took immediate actions to address these findings. Fire alarms are properly maintained and accessible and electrical switches are properly covered.	11
May-17	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	Missing fire extinguishers in several buildings.	Regularly monitor fire extinguishers. Maintain an OSH checklist and perform regular internal OSH assessments.	Fire extinguishers were installed in the designated areas and properly maintained.	76
May-17	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	The evacuation plans posted at the workplace need to be updated according to the newly renovated floor layout. Several emergency exits have not yet been equipped with emergency exit lights. Also, the evacuation aisle markings on the floor need to be revised.	Update the evacuation plans. Equip exits with emergency exit lights. Mark the evacuation aisles according to the new floor layout.	The evacuation plan has been updated according to the new layout of the floor. New emergency exit lights have been purchased.	11

May-17	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	Buildings 42 and 43 are interconnected, each building has a main exit and a shared secondary exit. This second exit was locked at the time of the assessment.	Keep the exits accessible during working hours. Two accessible exits should be available on each floor.	The employer has ensured accessible and adequate emergency exits. The construction work has been completed and is no longer obstructing the exit ways.	11
<b>Assessment June 2016</b>						
Jun-16	<b>Compensation</b>	<b>Paid Leave</b>	The calculation of annual leave is not accurate for workers who were entitled to maternity leave during the year.	Ensure payment for annual leave is accurate.	Maternity leave payments is now based on the average of all earnings from the last three months of work.	
Jun-16	<b>Compensation</b>	<b>Paid Leave</b>	The piece rate workers who go on breastfeeding break are paid the minimum wage instead of the average earnings.	Ensure payments for maternity leave are based on average earnings.	Nursing workers now receive compensation based on the average of all earnings from the last three months of work for breastfeeding breaks.	
Jun-16	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	The calculation used for the annual salary supplement is not correct for workers who were entitled to maternity leave payment during the year.	Ensure annual salary supplement payments are accurate.	Maternity leave payment is now considered as a part of total earnings when calculating annual salary supplements or bonuses.	
Jun-16	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	EAs observed several unlabeled containers in the chemical room which contained a thinner-like chemical product.	Ensure all containers of chemicals and hazardous substances are properly labeled.		
Jun-16	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	Missing MSDS in the material room in building 42, the boiler room and also in the cutting area.	Provide MSDS for all chemicals and hazardous substances in use in the workplace.	Management stated that thinner is not used in the boiler room or the cutting area and will ensure that all chemical products are properly stored and provided with MSDS. However, during the advisory visit in February, EA observed unlabeled thinner bottles in the material room and two bottles of Blow Out in the cutting section.	
Jun-16	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	There is no eye wash station in the ink preparation room. Also, the one in the chemical room is not working and no eye wash station was available in the material room and in the boiler room.	Add eye wash stations where needed.	The ink preparation room was provided with an eye wash station and the one in the chemical room has been repaired.	
Jun-16	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	No earplugs were found in the generator room and heat protective aprons were not available for workers in the boiler room.	Provide workers appropriate personal protective equipment.	Earplugs were provided to workers in the generator room.	
Jun-16	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	During the factory tour, several machines were observed missing eye guards and finger guards.	Install appropriate guards on all machines.	An inventory of missing needle guards is being maintained in order to regularly purchase and install them when needed.	

Jun-16	Occupational Safety and Health	Worker Protection	During the factory tour, EAs observed one main electrical box open on the floor in building 43.	Ensure all electrical boxes are properly protected and isolated.	All the electrical boxes were properly covered.	
Jun-16	Occupational Safety and Health	Working Environment	Temperatures in the workplace exceed the recommended level of 30 C.	Ensure that temperature level are below 30 C.	A cooling system has been installed.	
Jun-16	Occupational Safety and Health	Welfare Facilities	The factory is compliant with the law with regards to men's toilets but needs 33 additional toilets for women.	Increase the number of toilets for women.	Management stated that they do not have any plans to increase the number of toilets as they consider this to be a responsibility of the industrial park administration. Building additional toilets has also been noted as a challenge due to the lack of space.	
Jun-16	Occupational Safety and Health	Welfare Facilities	Although the factory has a designated eating area onsite, it cannot accommodate all workers.	Increase the capacity of the current eating area.	Two new eating areas are now available for the workers.	
Jun-16	Occupational Safety and Health	Health Services and First Aid	Workers do not receive any medical checks within the first three months of hiring.	All newly hired workers must be submitted to a medical check within the first 3 months of employment.	The factory has a doctor who will provide health checks to newly recruited workers.	
Jun-16	Occupational Safety and Health	Health Services and First Aid	The factory does not provide health checks to all workers who have been exposed to work related hazards.	Provide health checks at no cost for workers who are exposed to work-related hazards.	Workers who are exposed to work-related hazards have already received one medical check during the advisory period.	
Jun-16	Occupational Safety and Health	Health Services and First Aid	Workers said that they do not receive annual medical checks.	Provide annual medical checks for all workers.	The factory has a doctor who will provide health checks to workers on a regular basis.	
Jun-16	Occupational Safety and Health	Health Services and First Aid	The factory has 2 nurses and a doctors who visit the factory 6 days per week . To comply with the Haitian Labor Code, a factory of this size must have a permanent onsite medical service with at least 6 nurses and 5 doctors' visits per week.	Ensure that the factory has an onsite medical service with at least 6 nurses and 5 doctors' visits per week.		
Jun-16	Occupational Safety and Health	Emergency Preparedness	Obstructed fire extinguisher.	Ensure all fire extinguishers remain unobstructed at all times during working hours.	All fire extinguishers are easily accessible and unobstructed. Members of the compliance team are doing daily OSH tours to ensure that extinguishers are unobstructed.	

**BETTER WORK HAITI - 16TH SYNTHESIS REPORT**



**Factory:** The WILLBES Haitian III S.A  
**Location:** Port-au-Prince  
**Number of workers:** 711  
**Date of registration:** Aug-10  
**Date of last two Better Wo** Jun-17 Jun-16

**Advisory and Training Services**

31-Oct-17 Meeting with management on Improvement plan update. Meeting with the OSH committee. Factory tour and self diagnosis.  
 17-Nov-17 PICC meeting on the inclusion of one representative of the new trade union into the committee. Discussion also on the overall industrial relations and social dialogue in the factory.  
 08-Dec-17 Human resources management training  
 28-Jan-18 Training on Heavy Load Lifting  
 02-Feb-18 Discussion on industrial relations and social dialogue between management and trade union leaders.  
 06-Apr-18 Industry seminar on BW Compliance Assessment Tool

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDIATION EFFORTS	MONTHS
<b>Assessment June 2017</b>						
Jun-17	Compensation	Overtime Wages	The internal rules indicate that workers are entitled to a 1 hour break period, which is included in the work schedule from 7:00 AM to 4:00 PM. However, in practice workers only receive a 30-minute break and are unaware that they ought to consider the remaining 30 minutes of their break as overtime.	Provide break time as indicated in the internal work rules in line with the law	Factory posted notices around the factory to let workers know that they are entitled to an hour long lunch break.	20
Jun-17	Compensation	Overtime Wages	Overtime hours worked at night were not compensated at 100 percent above the normal wage.	Accurately compensate workers for night shift work.	Facility made the necessary adjustments on the payroll to properly compensate for overtime hours during night shift.	8
Jun-17	Compensation	Paid Leave	Payments for non-working holidays are based on the minimum wage instead of average earnings.	Accurately compensate for legally mandated holiday based on average earnings.	The payroll system has been changed so that non-worked holidays are paid based on the average earnings.	8
Jun-17	Compensation	Paid Leave	Payments for weekly rest days are based on the minimum wage instead of average earnings.	Accurately compensate for weekly rest days based on average earnings.	The payroll system has been changed so that weekly rest days are paid based on the average earnings.	8

Jun-17	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	Employer contribution to ONA is calculated based on the minimum wage instead of the base salary.	Pay ONA contributions for all workers that have been working at the factory for more than three months. ONA contributions should be calculated based on the workers' base salaries.	The required employer contribution to ONA for the workers in the printing building has already been paid. The amount is now being calculated using the base salary.	20
Jun-17	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	Workers' contributions to ONA is calculated based on the minimum wage instead of the base salary.	Collect and forward workers' contributions to ONA and accurately calculate the contributions based on the base salary.	The contributions to ONA are accurate. Contributions are being collected from all workers.	20
Jun-17	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	The factory is not registered with OFATMA for maternity and health insurance.	Register with OFATMA for maternity and health insurance.	The employer has initiated the registration process with OFATMA, by paying the company's contribution for the month of July 2017.	10
Jun-17	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	The factory is not registered with OFATMA for maternity and health insurance.	Register with OFATMA for maternity and health insurance. Collect and forward workers' contributions to OFATMA.	OFATMA officials have started meeting with workers to explain the scope of the Health Insurance scheme to our employees.	10
Jun-17	<b>Contracts and Human Resources</b>	<b>Termination</b>	Workers were dismissed without documentation of valid reason.	Properly document workers' employment history and any other relevant information in their personnel files.	The HR Manager has been re-trained to perform his duties properly. Periodic reviews are being conducted to make sure this does not happen in the future.	10
Jun-17	<b>Contracts and Human Resources</b>	<b>Reductions in workforce size or suspensions due to changes in operations</b>	The factory did not notify MAST prior to the temporary suspension of work.	Send a notification to MAST to justify the temporary suspension of work.	The print shop Manager has been trained on this issue. Going forward, the Labor Office will be notified prior to any temporary suspensions to reduce the workforce.	10
Jun-17	<b>Contracts and Human Resources</b>	<b>Dialogue, Discipline and Disputes</b>	Workers and union members complained about supervisors who frequently used vulgar language against the workers.	Add supervisory skill training for supervisors.	Supervisors from all Willbes Haiti factories participated in the supervisory skills training by Better Work in August 2017.	10

Jun-17	Occupational Safety and Health	OSH Management Systems	The employer do not submit the records to OFATMA on a monthly basis.	Submit work-related accidents and diseases records to OFATMA on a monthly basis.	The monthly reports of the work-related accidents are being sent to OFATMA on a monthly basis.	10
Jun-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Unlabeled hazardous and chemical substances.	Identify all dangerous substances. Post warning signs near the gas tanks. Properly safeguard any sources of ignition.	Warning signs have been posted in the noted areas. Identification labels on the tanks will be placed shortly.	10
Jun-17	Occupational Safety and Health	Chemicals and Hazardous Substances	MSDS missing for hazardous and chemical substances used in the workplace.	Ensure that MSDS' are available in the storage warehouse in the printing building.		20
Jun-17	Occupational Safety and Health	Worker Protection	All of the single needle machines were missing finger guards.	Ensure that machines have their necessary safety guards. Train the maintenance team on Occupational Safety and Health issues.	All single needle machines were provided with finger guards. Sewing machine operators will be trained on the mandatory use of safety guards to comply with the internal rules.	20
Jun-17	Occupational Safety and Health	Worker Protection	Obstructed electrical panel.	Keep electrical equipment away from flammable materials. Conduct weekly inspection tours to address OSH issues.	Employees working in that area were warned and re-trained to keep the electric panels free from flammable materials.	10
Jun-17	Occupational Safety and Health	Working Environment	Temperatures above the recommended 30 C were noted in Buildings 34 and 35.	Maintain a maximum temperature of 30 C in all sections.		21
Jun-17	Occupational Safety and Health	Working Environment	Insufficient lighting was noted in the packing and pressing sections.	Ensure a minimum of 500 lux in the packing and pressing sections.		10
Jun-17	Occupational Safety and Health	Welfare Facilities	The factory has 19 functioning toilets for women and 9 toilets for men. With its current workforce, the factory should have 5 functioning toilets for men and 45 functioning toilets for women.	Comply with the Haitian Law on the required number of toilets for men and women.		75



Jun-17	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	No soap is provided in the toilets for the workers to wash their hands.	Ensure that soap is available in the restrooms for the workers.	This issue was corrected during the factory assessment when janitorial staff and supervisors ensured to have hand soap available in the toilets.	10
Jun-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	Management provided a list of medical checks conducted in 2014 and worker interviews further revealed that no medical checks were arranged for newly hired workers within the first three months of employment.	Arrange medical checks for workers within their first three months of employment.	Mandatory medical checks have been started already and all workers will be covered within 4 months. Additional checks are being requested through OFATMA. Also, the factory changed the doctor's contract to full-time.	75
Jun-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	No periodic medical checks were arranged for workers who have been exposed to work-related hazards.	Arrange at least two medical checks a year for workers who have been exposed to work-related hazards	Mandatory medical checks have been started already and all workers will be covered within 4 months. Also, the factory changed the doctor's contract to full-time.	75
Jun-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	Annual medical checks were not provided to workers.	Arrange at least one medical check a year for all the workers.	Mandatory medical checks have been started already and all workers will be covered within 4 months. Also, the factory changed the doctor's contract to full-time.	75
Jun-17	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	Insufficient number of medical staff.	Comply with the Haitian law regarding the onsite medical staff.	Facility has a new clinic on site.	75
Jun-17	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	The emergency escape routes in Building 35 have not been marked according to the newly arranged floor layout.	Mark emergency escape routes according to the new layout of the building. Ensure that the evacuation map is adapted to the new layout.	The emergency escape routes in Building 35 have been marked according to the newly arranged floor layout.	10

Jun-17	Working Time	Regular Hours	The daily break is not provided according to the internal work rules. Also, the pregnant women employed at the factory are unaware of their right to take two additional breaks of half hour each.	Provide one hour break to workers. Ensure that pregnant women are aware of their additional breaks. Post messages of their additional breaks throughout the factory and in the clinic room.	Factory reviewed the daily break time. The working hours are displayed in prominent areas around the factory. Training was provided to HR staff and all pregnant women employed at the factory are aware of their rights.	10
Jun-17	Working Time	Regular Hours	Prior authorization was not obtained from the Department of Labor before working at night.	Obtain an authorization from the Department of Labor before performing overtime work.		10
Jun-17	Working Time	Overtime	Overtime legal limits were exceed.	Ensure to not exceed the legal limits of overtime.		10
Jun-17	Working Time	Overtime	Overtime work is performed during daily break.	Provide a one hour break to workers according to the internal rules.	Factory reviewed the daily break time. The working hours are displayed in prominent areas around the factory. Training was provided to HR	10
<b>Assessment June 2016</b>						
Jun-16	Compensation	Minimum Wages/Piece Rate Wages	The adjustment for the minimum wage was not applied consistently for the month of May 2016.	Apply the adjustment of the minimum wage.	The payment was recalculated and the missing amount has been paid to all workers.	
Jun-16	Compensation	Overtime Wages	The adjustment to the minimum wage was not applied to overtime hours worked in May 2016.	Apply the adjustment of the minimum wage to overtime hours.	The payment was recalculated and the missing amount has been paid to all workers.	
Jun-16	Compensation	Paid Leave	Some workers were only paid the rest day if they completed 48 hours of work during the week regardless of how many days in the week they come to work.	Pay accurately for weekly rest days.	The calculation error in the system has been amended.	
Jun-16	Compensation	Social Security and Other Benefits	Employer contribution to ONA is inaccurate.	Employer must adjust the amount of their contributions to ONA based on the average earnings of the workers.	The contribution to ONA for all Willbes factories is paid based on the workers' base salary.	

Jun-16	<b>Compensation</b>	<b>Social Security and Other Benefits</b>	The amount collected and forwarded for workers' contributions for social insurance funds to ONA is inaccurate.	Employer must collect and forward workers' contributions to ONA based on the average earnings of the workers.	ONA contributions are based on the base salary. Facility properly collects and forwards workers' contributions to ONA.	
Jun-16	<b>Occupational Safety and Health</b>	<b>Chemicals and Hazardous Substances</b>	No MSDS for the glue spray used in the cutting section.	Provide MSDS for all chemicals and hazardous substances in use in the workplace.	MSDS are available for all chemical substances used in the workplace.	
Jun-16	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	One worker in the cutting section was seen using a chemical spray without the proper personal protective equipment.	Provide workers personal protective clothing and equipment.	All workers are provided with the necessary PPE.	
Jun-16	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	Several workers were observed standing without fatigue mats.	Ensure that the factory is compliant with ergonomic requirements.	All standing workers are provided with ergonomic mats.	
Jun-16	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	During the factory tour, several machines were seen without the appropriate safety guards.	Install appropriate guards on the machines.	An inventory of missing guards is being done in order to regularly purchase and install them when needed.	
Jun-16	<b>Occupational Safety and Health</b>	<b>Working Environment</b>	Temperatures in the workplace exceed the recommended level of 30 C.	Ensure that temperature level is compliant in all sections.	Air cooling systems have been installed.	
Jun-16	<b>Occupational Safety and Health</b>	<b>Working Environment</b>	Noise level is too high.	Ensure that noise level is compliant in all sections.	Last check showed that the noise levels in all section was under 90 db.	
Jun-16	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	Insufficient number of toilets.	Increase number of toilets.		
Jun-16	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	The factory has an eating area. However, it can only accommodate about 20 percent of the workforce.	Increase capacity of the current eating area.	An eating area with a capacity for 700 workers has been established and is ready for use and a second eating area, designed for 350 workers, is under construction.	
Jun-16	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	Medical checks are not systematically provided within the first three months of hiring.	Provide medical check to all new workers.	The factory has a doctor that performs systematic checks for newly recruited workers.	

Jun-16	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	Annual medical checks are not systematically provided.	Provide annual medical checks to all workers.	Health checks are performed annually for all workers.	
Jun-16	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	Insufficient medical staff.	Ensure that the factory has at least 3 nurses.		
Jun-16	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	Inadequate first aid boxes.	Provide sufficient adequate first aid boxes.	The employer provide a sufficient number of readily accessible first aid boxes.	

**BETTER WORK HAITI - 16TH SYNTHESIS REPORT**



**Factory:** Val d'Or Apparel Mfg. S.A  
**Location:** Port-au-Prince  
**Number of workers:** 1260  
**Date of BW registration:** Sep-14  
**Date of last two Better Work assessments:** Nov-16  
 Sep-17

**Advisory and Training Activities**

20-Oct-17 Discussion on the last assessment findings and progress report to be prepared by the factory with a detailed action plan.  
 15-Nov-17 PICC meeting with the PICC members and trade unions on various subjects such as annual leave, daily break and changes that occurred in some workers employment contracts.  
 18-Jan-18 Introduction meeting with PICC to discuss the importance of communicating the PICC role and action with other workers and relevant stakeholders.  
 15-Feb-18 Meeting on time and productivity study findings with productivity consultants, management, PICC members and union leaders.  
 16-Feb-18 Meeting on time and productivity study findings with productivity consultants, management, mechanics and plant engineers.  
 7-Mar-18 Discussion on training needs of PICC members. Factory tour to verify OSH remediations with PICC OSH focal points. Discussion with union members and management regarding disciplinary measures.

ASSESSMENT	COMPLIANCE CLUSTER	COMPLIANCE POINT	DETAILS OF NON COMPLIANCE	IMPROVEMENT PRIORITIES	REMEDIATION EFFORTS	MONTHS
<b>Assessment September 2017</b>						
Sep-17	Compensation	Overtime Wages	Some workers were not paid 50 percent premium for overtime hours worked.	Comply with the law regarding the overtime payment		6
Sep-17	Compensation	Premium Pay	Workers were not paid 50 percent above the normal wage for regular hours worked on legally mandated holidays.	Comply with the law regarding the overtime payment		6
Sep-17	Compensation	Paid Leave	Payments for non-working holidays are based on the minimum wage instead of average earnings.	Comply with the law regarding the payment for non-working holidays		6
Sep-17	Compensation	Paid Leave	Payments for weekly rest days are based on the minimum wage instead of average earnings.	Comply with the law regarding the payment for weekly rest day		6
Sep-17	Compensation	Social Security and Other Benefits	The factory calculates ONA contributions based on the minimum wage instead of the base salary.	Comply with the law regarding ONA's contributions		6
Sep-17	Compensation	Social Security and Other Benefits	ONA deductions are based on the payroll of the last 2 weeks of each month instead of the full month as required by law.	Comply with the law regarding ONA's deductions		6
Sep-17	Compensation	Social Security and Other Benefits	The factory has not registered with OFATMA for maternity and health insurance and does not pay workers' contributions.	Register with OFATMA for maternity and health insurance.		29
Sep-17	Compensation	Social Security and Other Benefits	The factory has not registered with OFATMA for maternity and health insurance and does not collect and forward workers' contribution.	Register with OFATMA for maternity and Health Insurance.		29

Sep-17	Contract and Human Resources	Employment Contracts	The daily break duration listed in the contracts is not in line with the internal work rules.	Align contracts with internal work rules		6
Sep-17	Contract and Human Resources	Contracting Procedures	Foreign worker's contracts do not specify the period of employment and the hours of work and these workers are not covered by work-related accident insurance.	Specify the type of employment in the foreign workers' contracts. Ensure that all workers are covered by OFATMA for work related accidents.		6
Sep-17	Contract and Human Resources	Dialogue, Discipline and Disputes	Workers reported incidents of verbal abuse by supervisors and managers.	Plan training for supervisors and managers on supervisory skills.		17
Sep-17	Occupational Safety and Health	Chemicals and Hazardous Substances	The factory does not maintain an updated inventory of chemicals and hazardous substances.	Maintain a detailed inventory of the chemicals used in the workplace.		6
Sep-17	Occupational Safety and Health	Chemicals and Hazardous Substances	Chemicals and hazardous substances are not properly labeled.	Label all containers used in the workplace in local language		6
Sep-17	Occupational Safety and Health	Chemicals and Hazardous Substances	The chemical warehouse did not have all the required MSDS.	Provide MSDS for all chemicals or hazardous substances used in the workplace		6
Sep-17	Occupational Safety and Health	Chemicals and Hazardous Substances	The factory did not show evidence of training for workers who use chemicals and hazardous substances.	Provide training to workers who use chemicals and hazardous substances		6
Sep-17	Occupational Safety and Health	Worker Protection	Management has not provided proper masks and goggles to workers in the boiler area	Provide proper personal protective equipment to workers. Provide goggles to workers in the boiler area		17
Sep-17	Occupational Safety and Health	Worker Protection	Workers in the sewing area were not using the installed safety eye guards.	Provide training on the use of sewing machine guards.		6
Sep-17	Occupational Safety and Health	Worker Protection	Pregnant women were observed in chairs without backrests.	Provide adequate chairs to workers.		6
Sep-17	Occupational Safety and Health	Working Environment	Workplace temperature exceed 30 C.	Fix the exhaust system in the cutting area and explore means of reducing temperature.		6
Sep-17	Occupational Safety and Health	Welfare Facilities	Insufficient number of toilets.	Comply with legal requirements regarding the number of toilets.		17
Sep-17	Occupational Safety and Health	Health Services and First Aid	The factory did not show evidence of medical checks conducted for workers within the first three months of hiring.	Coordinate with OFATMA or internal doctor to perform adequate medical checks within 90 days of hiring.		6
Sep-17	Occupational Safety and Health	Health Services and First Aid	The factory did not provide health checks to workers who have been exposed to work-related hazards.	Coordinate with OFATMA or internal doctor to perform the relevant medical checks		6
Sep-17	Occupational Safety and Health	Health Services and First Aid	The factory did not show evidence of annual medical checks for workers.	Coordinate with OFATMA or internal doctor to perform the relevant medical checks		6

Sep-17	Occupational Safety and Health	Health Services and First Aid	Insufficient medical staff.	Increase the number of nurses and doctors to comply with national law		17
Sep-17	Occupational Safety and Health	Emergency Preparedness	Missing and obstructed fire extinguishers.	Replace fire extinguisher in module 28 and train workers on keeping the fire fighting equipment unobstructed.		17
Sep-17	Occupational Safety and Health	Emergency Preparedness	Aisles obstructed by fabric rolls and boxes in the workplace.	Train workers on keeping the aisles unobstructed.		17
Sep-17	Occupational Safety and Health	Emergency Preparedness	Obstructed and closed emergency exits found in the workplace.	Keep emergency exits unobstructed and accessible at all times.	Management left doors opened half way with security guards in attendance in order to open fully in the event of an evacuation.	6
Sep-17	Occupational Safety and Health	Emergency Preparedness	No operating procedures available for the boiler.	Make operating manual available to operators and keep an operating log for the boiler		6
Sep-17	Working Time	Overtime	A review of attendance records revealed that the factory exceeds the legal overtime limit for workers in the production, cleaning and cut control areas.	Take adequate measures to stay within 80 hours of overtime per trimester.		6
Sep-17	Working Time	Overtime	No valid authorization to work overtime.	Obtain overtime authorization from MAST for overtime.		6
<b>Assessment November 2016</b>						
Nov-16	Discrimination	Gender	Sexual harassment	Maintain a strict policy against sexual harassment at the workplace and systematically train newly hired workers, supervisors and managers on this topic. Strengthen and encourage the use of grievance reporting mechanisms and address any cases at an early stage.	Factory management conducted their own internal investigation and then implemented the following actions : 1) Training for supervisors and managers on sexual harassment prevention 2) Distribution of Valdor's policy against sexual harassment to supervisors 3) Posting the creole version of the policy on the bulletin board 4) Disciplinary measures taken against the supervisory staff involved in the reported cases.	
Nov-16	Compensation	Paid Leave	The payment for sick leaves is not accurate for all workers.	Accurately compensate workers for sick leaves in accordance with legal requirements.	Sick leave is now correctly compensated regarding to the Haitian Labor Code.	
Nov-16	Compensation	Paid Leave	The payment for maternity leaves is not accurate for all workers.	Accurately compensate workers for sick leaves in accordance with legal requirements.	The sick leave is correctly paid now. It is based on average earnings.	
Nov-16	Compensation	Social Security and Other Benefits	The factory has not registered with the health and maternity insurance provider of OFATMA.	Ensure that the factory is affiliated to the health and maternity insurance by OFATMA.	The factory invited OFATMA to promote the program with the workers before they start with registration.	
Nov-16	Compensation	Social Security and Other Benefits	The factory does not collect and forward worker's contribution for the health and maternity insurance of OFATMA.	Ensure that the factory is affiliated to the health and maternity insurance by OFATMA.	The factory invited OFATMA to promote the program with the workers before they start with registration.	

Nov-16	<b>Contract and Human Resources</b>	<b>Dialogue, Discipline and Disputes</b>	Verbal abuse cases were found at the factory.	Reinforce the grievance mechanism system. Provide training on supervisory skills. Post messages encouraging mutual respect throughout the workplace.	The factory has launched a series of training sessions for supervisors and management. Awareness raising posters are displayed on the bulletin board to encourage workers to use the suggestion boxes or to report any abuses from supervisors and managers directly to the HR.	
Nov-16	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	The maintenance staff were not using dust masks and gloves, which were provided by management.	Train workers on the usage of PPE.	The factory planned to perform Continuous training for the maintenance crew and production operators along the year. They have already held regulars reminder sessions.	
Nov-16	<b>Occupational Safety and Health</b>	<b>Worker Protection</b>	Exposed electrical wire found in the workplace.	Establish and maintain an effective electrical installation management system.	Electrical wires are properly maintained by the factory electrician.	
Nov-16	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	Insufficient number of toilets.	Provide an adequate number of accessible toilets for all workers in accordance with the Haitian labor code.	Management agreed to contact the owner of the industrial park to study the feasibility of adding new toilets. In the meantime, they will try to reallocate some of the men's toilets for the women.	
Nov-16	<b>Occupational Safety and Health</b>	<b>Welfare Facilities</b>	During the factory tour, EAs observed that there was no soap in the workers' toilets.	Establish and maintain an effective OSH management system.	Management regularly supplied soap to all the toilets. Also, management aims to train the personnel working in the toilets to monitor this issue regularly.	
Nov-16	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	Insufficient number of medical staff.	Comply with the Haitian Labor Code regarding the provision of onsite medical services.	The factory has signed a new contract with the medical services provider DASH which include a 5 day Doctor visits as of June 1st, and one nurse. The factory has hired three additional nurses. The factory is in compliance with the articles 478 & 479 of the Haitian Labor Code.	
Nov-16	<b>Occupational Safety and Health</b>	<b>Health Services and First Aid</b>	First aid boxes not well supplied.	Ensure that all first-aid boxes are adequately equipped and can be easily accessible in a timely manner.	The OSH team is being re-trained on these requirements as some of the previously trained members have resigned. All the listed products are in the first aid boxes. During the last advisory the box were opened within the 2 minutes right after the request.	
Nov-16	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	Obstructed and misplaced fire extinguishers found in the workplace.	Adequately maintain all firefighting equipment so that they are easily accessible in case of emergencies.	All fire extinguisher area were cleaned up and the firefighting equipment's were easily accessible.	



Nov-16	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	Several exit doors could not be fully opened and two other exit doors were found locked.	Ensure that the emergency exits are unlocked and unobstructed during working hours. To reduce the impact of the wind on work processes, management will also install plastic curtains on the door ways.	Management has installed plastic curtains on all exits doors to let those emergency exits unlocked and to reduce the impact of the wind.	
Nov-16	<b>Occupational Safety and Health</b>	<b>Emergency Preparedness</b>	Cell phones were being charged inappropriately throughout the workplace.	Provide a designated phone charging station and post "No phone charging" signs in all other areas throughout the workplace.	A cell phone charging station was installed.	

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

#### **CORE DONORS TO BETTER WORK**

Netherlands Ministry of Foreign Affairs

Swiss State Secretariat for Economics Affairs

Ministry of Foreign Affairs of Denmark

The Government of Australia

Represented by the Department of Foreign Affairs and Trade (DFAT)

The US Department of Labor

Funding is also provided by DFID, Government of France, Government of Canada, Irish Aid, GMAC, Royal Government of Cambodia and private sector donors, including The Walt Disney Company, Levi Strauss Foundation, Gap Inc. and FUNG (1937) Management Ltd





International  
Labour  
Organization



**IFC**  
**International  
Finance  
Corporation**  
WORLD BANK GROUP