

Better Work Haiti: Garment Industry

11th Biannual Synthesis Report Under the HOPE

II Legislation

Produced on 16 October 2015

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List of Acronyms

ADIH	Association des Industries d'Haïti (Haitian Industry Association)
CAOSS	Conseil d'Administration des Organismes de Sécurité Sociale (Board of Social Security Bodies)
CATH	Centrale Autonome des Travailleurs Haïtiens (Haitian Workers Central)
CFOH	Confédération des Forces Ouvrières Haïtiennes (Haitian Workforce Confederation)
CNOHA	Centrale Nationale des Ouvriers Haïtiens (Haitian Workers National Central)
CODEVI	Compagnie de Développement Industriel (Industrial Development Company)
CP	Compliance point
CSH	Coordination Syndicale Haïtienne
CSS	Conseil Supérieur des Salaires (Wages High Council)
CTH	Confédération des Travailleurs Haïtiens (Haitian Workers Confederation)
CTMO-HOPE	Commission Tripartite de Mise en œuvre de la loi HOPE (Tripartite HOPE Commission)
EA	Enterprise Advisor
HELP	Haiti Economic Lift Program
HOPE	Haitian Hemispheric Opportunity Through Partnership Encouragement
ITUC	International Trade Union Confederation
MSDS	Material Safety Data Sheet
MOISE	Mouvement des Organisations Indépendantes Intégrées aux Syndicats Engagés (Mouvement of Independent Organisations integrated to Committed Unions)
MAST	Ministère des Affaires Sociales et du Travail (Ministry of Labour and Social Affairs)
OFATMA	Office d'Assurance de Travail, de Maladie et de Maternité (Office for Work, Health and Maternity Insurance)
ONA	Office Nationale d'Assurance Vieillesse (National Office for Old-Age Insurance)
OSH	Occupational safety and health
PAC	Project Advisory Committee
PIC	Parc Industriel de Caracol
PICC	Performance Improvement Consultative Committee
PIM	Parc Industriel Métropolitain (also referred to as SONAPI)
PPE	Personal Protective Equipment
SC/AFL-CIO	Solidarity Center/American Federation of Labour - Congress of Industrials Organisations
TAICNAR	Technical Assistance Improvement and Compliance Needs Assessment and Remediation
USDOL	United States Department of Labor

Section I: Introduction and Methodology

Better Work Haiti, a partnership between the International Labour Organization (ILO) and the International Finance Corporation (IFC), was launched in June 2009. The program aims to improve the working conditions and competitiveness of the apparel industry by increasing respect of the Haitian labour code and of the ILO Declaration on Fundamental Principles and Rights at Work and strengthening economic performance at the enterprise level.

Better Work Haiti targets the apparel industry in Haiti, especially in the capital Port-au-Prince and in the north-east region of the country. In 2014, total export revenues from the textile and garment industry accounted for approximately 90% of national export earnings and 10% of national GDP. The apparel industry is also among the largest employers within Haiti, creating jobs for approximately 40,000 people. Most workers (about 65-70%) are women who support a number of family members.

The program assists participating factories by conducting independent compliance assessments and providing advisory services and trainings. This report presents the results of assessments, advisory and training services provided to 26 factories in the period between September 2014 and August 2015.¹ As part of its mandate to share information with all stakeholders in the program and encourage continuous improvement, Better Work Haiti produces twice yearly synthesis reports containing information on the performance of all participating factories in the period.

1.1 Structure of the report

This is the eleventh report to be produced by Better Work Haiti in the framework of the HOPE II legislation. This synthesis report provides an overview of the working conditions of 26 factories. As outlined in the tenth public biannual synthesis report, Better Work transitioned to a revised service delivery model in spring 2015 with stronger focus on advisory services. Therefore, compliance information presented in this public report is based on assessment and advisory services at the factory level. In the period between March and August 2015, fourteen out of the currently operating 26 exporting factories in Haiti, were assessed by Better Work and their updated compliance information is included in this report. For the remaining twelve factories, information from their last assessment is included to present aggregated industry level compliance data. Six factories have been out of operations over the past months: Genesis S.A., Gladiator Textiles LLC, Industrial Revolution II S.A., Johan Company, Seed Apparel S.A., The Little Haitian Factory S.A. Three factories have newly registered to the Better Work program in the reporting period: Life S.A., Goal Export S.A., Textiles Youm Kwang S.A.

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

¹ Assessments are now being conducted on an annual basis for each participating factory. Therefore, assessment information is updated in every second compliance synthesis report for each individual factory.

The second section of the report outlines the compliance assessment findings from the most recent factory assessments in all factories. As explained above, the Better Work service delivery model underwent some changes in early 2015. Factories are now being assessed on an annual basis. Therefore, compliance information in these biannual public reports is drawn from the last assessment that has been conducted in each factory. For about half of the factories, this last assessment will have taken place in the past 6 months, for the other half, the past assessment will be 6-12 months ago. This section also includes an analysis of compliance effort since the previous synthesis report. The third section of the report describes Better Work Haiti advisory and training services in the period from March - August 2015 in all participating factories.

The fourth section of the report outlines the priorities of the Better Work Haiti program in the upcoming months. Finally, the last section describes the efforts made by the factories to correct the compliance needs identified in the Better Work Haiti compliance assessments. Information provided for each of the participating factories includes: compliance needs for each compliance cluster and each compliance point; details of non-compliance; improvement priorities; efforts made by the factory to remedy the compliance needs as verified in the latest Better Work Haiti assessment visit; and with respect to non-compliance areas that have not been remediated, the amount of time that has elapsed since the non-compliance was first reported publicly. For factories that have not been assessed in the last 6 months but in the previous assessment cycle, additional information on their progress on previously identified non-compliance points is stated. Also, the date of the last assessment is mentioned for each individual factory.

1.2. Context

The HOPE II legislation and the TAICNAR project

In 2006, the United States Congress enacted the Haiti Hemispheric Opportunity for Partnership Encouragement Act of 2006 (HOPE), expanding preferences for Haitian apparel established under the Caribbean Basin Economic Recovery Act, thus enabling the Haitian garment 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 garment 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 until 2020, and significantly expanded the tariff preference level limits for knit and woven apparel.

In order to benefit from HOPE/HOPE II/HELP, Haiti was required to establish an independent Labour 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 program to assess and promote compliance with core labour standards and national labour law in the factories that are eligible for tariff advantages under HOPE II. This was referred to in the legislation as the *Technical Assistance Improvement and Compliance Needs Assessment and Remediation* (TAICNAR) 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.

There are two components to the TAICNAR program. The first of these consists of technical assistance to strengthen the legal and administrative structures for improving compliance in the industry. The scope of these services is extensive, encompassing technical assistance from the ILO in reviewing national laws and regulations to bring them into conformity with international standards, raising awareness of workers' rights, and training labour inspectors, judicial officers and other government personnel. The second element of the TAICNAR program focuses on assessing compliance with core labour standards and national labour law, supporting remediation efforts, and publicly reporting on the progress of each factory on the Labour Ombudsman's register.

To encourage compliance with core labour standards and national labour 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 labour standards and national labour law that is related and consistent with those standards.

Better Work Haiti, which is a partnership of the ILO and the IFC, is implementing the TAICNAR program. The program is coordinating its work with the Labour Ombudsman and the HOPE Commission, a presidential tripartite commission comprising three members of the Haitian government, three members of the Haitian private sector and three members of national workers' organizations. It is supervised by a President and guided by an Executive Director.

Recent Developments

This section of the report presents the changes and developments that have occurred during the last six months which have an impact on the Better Work Haiti program and broadly on the apparel sector in Haiti.

- In 2014, the total export volume of the garment industry to the United States was US\$ 854 million. Haitian apparel exports increased by approximately 6% over 2013. The figures for 2015 show a 12% increase over the comparable period in 2014. These figures are through July 2015 until when Haitian apparel exports to the United States have already passed US\$ 500 million.
- To the original quota levels of 70 million square meter equivalents (SMEs) established through HOPE and HOPE II, an additional trigger mechanism was added through HELP. If imports meet or exceed 52 million SMEs in one annual period (1st Oct - 30 Sept), quota levels for either or both the knit apparel and/ or woven apparel TPLs would automatically increase to 200 SMEs. In 2014, this trigger mechanism was activated for the first time in September and in July 2015, OTEXA announced again that imports from Haiti had exceeded the 52 million SME threshold (so the threshold was even reached much earlier in 2015 compared to 2014). The knit apparel TPL's quota level will therefore again increase to 200 million SMEs for the remainder of the 2014/ 2015 period.
- On 11th June 2015 the extension of the Trade Preferences Extension Act of 2015 (HOPE/HELP) has been adopted by the U.S. House of Representatives (397 votes for, 32 votes against) after being passed in the US Senate in May (97 votes to 1 vote against). The House approved the trade preferences bill which includes a 10-year renewal of the African Growth and Opportunity Act (AGOA), retroactive renewal and an update to the Generalized System of Preferences (GSP) program and an extension of the Haiti HELP/HOPE benefits until 2025.
- In May 2015, President Martelly announced an increase of the minimum wage in the garment industry with immediate effect. In line with the recommendations of the CSS (Conseil Supérieur des

Salaires), the minimum wage of reference was increased from 225 to 240 Gourdes, and the production wage was increased from 300 to 320 Gourdes per 8 hours of work. At the same time, the national Haitian currency (Haitian Gourde) saw devaluation over the past months and hit a record low to the US Dollar in July 2015.

- In September 2015, Ariel Henry was appointed new Minister for Social Affairs and Labour and he took this office over from Victor Benoit. In the installation ceremony, Prime Minister Evans Paul invited the new Minister of MAST to work towards the consolidation of employment and contribute to poverty reduction.
- Elections were held in Haiti on 9 August 2015, with a second round planned on 25 October. Two-thirds of the Senate and all members of the Chamber of Deputies (119 members) were up for election. Runoff elections are set for October 25, the same day as the first round for presidential voting. The Haitian Parliament was dissolved in January after scheduled legislative elections in 2011 and 2014 had been postponed. The Chamber of Deputies has been sitting empty and the Senate, with only 10 of its 30 members, has failed to field a quorum. President Michel Martelly has been ruling by executive order since January. He took office in May 2011 and is in the final year of a five-year term.
- In September 2015, the annual Better Work Haiti buyers' and multistakeholder forum was held in Port-au-Prince. For the first time, the multistakeholders' day was held in the form of an industry fair which brought together different stakeholders' of the industry to present the work they do, exchange information and contact details and allow for networking opportunities. 30 representatives from 14 international brands participated in the forum. On the second day of the forum, buyer representatives met with the Better Work Haiti team to discuss compliance findings of Haitian suppliers, challenges faced by the industry and work ahead in the light of the extension of the HOPE/HELP preferences for Haiti until 2025.
- In September 2015, Share Hope, the implementing partner of the HERHealth program in Haiti, launched a high school completion program. This program provides an opportunity for 40 garment factory workers in and around SONAPI who failed the final year of high school to prepare for and take the exam (Baccalaureat II). Share Hope wants to give these workers an opportunity to finish what they started and complete their studies. In a needs assessment conducted by Share Hope among factory workers, many expressed a desire to obtain their high school diploma. Share Hope's program is following the Haitian national curriculum, but the teaching approach also aims at creating a classroom environment where the students can express themselves, participate, raise questions and develop critical thinking. At present, this program is fully funded by Share Hope.

ILO-MAST Capacity Building Program

In 2014, the ILO launched a USDOL-funded project supporting the labour inspectorate of the Ministry of Labour and Social Affairs (MAST). A task force within the Ministry has been set up, and a series of different trainings for the Ministries' mediators, conciliators and labour inspectors have been provided since June 2014 in collaboration with the Labour Ombudsperson and Better Work Haiti, such as training of 18 Labour Inspectors task force members on practice of labour inspection and labour administration tools, Occupational Safety and Health, the Labour Law etc.

Since the inception of the MAST capacity building project, it has been planned that these trained labour inspectors will shadow Better Work Enterprises Advisers in conducting labour inspection visits in the apparel sector in 2015 as well as other activities by Better Work EAs, such as advisory or training services. This collaboration is aiming at giving an opportunity to MAST inspectors to capitalize on Better

Work's enterprise level knowledge and methodology in their core service delivery. The first round of joint visits has taken place in August 2015. Throughout the rest of the year, Better Work Enterprise Advisors and MAST Labour Inspectors will continue their joint factory visits. The MAST inspectorate task force members will further contribute to disseminate and transfer the acquired knowledge and competencies to their other colleagues.

Beyond the strengthening of the technical capacities of the labour administration, the project also focuses on aspects of human resources in the Ministry's inspectorate and to assist on issues such as labour inspectors' recruitment criteria, career planning, initial and continuing training programs etc. A thorough human resources review including the elaboration of a comprehensive job profile for labour inspectors has already been completed in 2014.

Beside these activities related to the labour inspection services, the project is also aiming at supporting MAST's conciliation services and the Office of the Labour Ombudsperson for the garment sector. Several trainings on conciliation and mediation methodology and ways to implement different technical and practical tools were conducted since the inception of the program in spring 2014. The project also works on promoting mechanisms of collaboration between the ministry's conciliation services and the Office of the Labour Ombudsperson in the garment industry.

Industrial Relations in the Haitian garment industry

At the time of writing, 44 officially recognized factory level unions are present in the apparel factories. These union cells are affiliated to 8 centrals/confederations and are present in 18 out of the 26 currently operating factories which are part of the Better Work Haiti program. Thus, approximately 70% of those exporting apparel factories in the country now have a union presence.²

The Haitian labour movement continues to benefit from the support of Solidarity Center/AFL-CIO and the International Trade Union Confederation/ Trade Union Confederation of Americas (ITUC-TUCA).

The office of Solidarity Center/ AFL-CIO in Port-au-Prince is open 7 days a week in order to facilitate access for Haitian unions. In the Center, visitors have access to computers, printers and internet for their work. In summer 2015, AFL-CIO organized two key trainings sessions with representatives of the union movement from Haiti's garment industry. On 07 August, a one day long training on communication skills has been provided to 30 union committee leaders and on 19 September, 40 union committee leaders participated in a training on conflict resolution. Besides that, Solidarity Center actively supports unions organizing campaigns in the Haitian garment industry and offers legal assistance to unions in factory dispute cases. Solidarity Center is also an advocate of the social dialogue roundtable for the garment industry and regularly participates in all of its meetings.

ITUC-TUCA supports Haitian trade union organizations through a variety of capacity building measures. Their work has a broader focus than the garment industry only. Areas in which ITUC-TUCA has provided support to Haitian labour unions in the past included social security/ social protection in support to the workers' representatives of CAOSS (Board of Social Security Bodies), gender equality, the labour law reform and national organizing campaigns in different sectors and regions in the country.

² Note that union presence in additional factories exists and has been previously reported but these additional factory-level unions have not yet attained official recognition and therefore are not included in the calculation.

Following the release of the first report of the CSS in November 2013, workers walked off the job in Port-au-Prince in early December 2013, calling for a higher increase in the minimum wage. The protests disrupted production and resulted in some violence. A number of workers from different factories were dismissed in connection with these events. Complaints from three factories for property damage by employers' side and by workers for wrongful dismissals were filed with the MAST and remain unresolved as of the writing of this report. In the case of one factory, MAST stated that it was not the competent authority to adjudicate the case and the matter was transferred to the High Labour Court for resolution. That case is still pending.

The Social Dialogue Roundtable was formally created by representatives of the employers and the unions, and the government as an observer and with support of Better Work Haiti in July 2012 as a space for exchange, consultation and negotiation to harmonize relations between employers and workers' organizations. Since early 2015, it is registered as an association and therefore a legal entity. Its executive secretariat consists of four members, two employer representatives and two union representatives. The social dialogue roundtable is serving as a forum for exchange and negotiation between employers and workers in order to strengthen the competitiveness of the Haitian garment sector in creating employment and contributing to the Haitian economy through the promotion of decent work. Since its establishment in mid-2014, the executive secretariat of the roundtable has called for regular meetings once a month. The Labour Ombudsperson is actively involved in these exchanges of the social dialogue roundtable. However, the table is in need of funding in order to more effectively fulfil its mandate.

As of January 2015, Better Work Haiti has designated a full-time Industrial Relations Officer. This person is liaising with national partners to assist the sector in these efforts and to further strengthen social dialogue. The Better Work Haiti Industrial Relations Officer is working closely with the social dialogue table, the Labour Ombudsman and all the unions of the garment industry in Haiti. Overall, the sector has seen an increase in communication between unions and employers, more meetings are being held, in some factories protocols are being signed on production quotas between management and union cells. In general, more information exchange between all stakeholder is being noticed which speaks for evolving industrial relations with a clear intent by all parties involved to improve cooperation.

Better Work Haiti is supporting these efforts through participation in sectoral activities, technical support where possible and direct assistance at the factory level through its advisory and training services delivered by the team of Enterprise Advisors and the IR Officer. Between March and August, the IR Officer held a number of meetings with union representatives on topics such as a policy on Freedom of Association, a joint training with MAST representatives on the Labour law, a general training with unions on compliance requirements for garment factories and Better Work's in factory work, including the revised service delivery model.

The Office of the Labour Ombudsman continues to play a key role in the prevention and remediation of factory level conflicts in the garment industry. In 2015, the Labour Ombudsman intervened and mediated in eight individual factory level dispute cases throughout Port-au-Prince. A number of cases have already been successfully remediated and all partners appreciate the Labour Ombudsperson as a significant support to more mature industrial relations in Haiti's garment sector.

In general, the Labour Ombudsperson cooperates with all stakeholders in the sector and is particularly involved in all efforts of coordination and mediation as well as training activities that are being held jointly with officials from the MAST. Equally, the Ombudsman's Office is trying to establish a more

formal relationship with the Ministry's (MAST) Conciliation Service. The Labour Ombudsperson is also providing support to the social dialogue roundtable.

1.3. The Better Work compliance assessment methodology

Better Work compliance assessment framework

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

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

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 1: Better Work compliance assessment framework

	Compliance clusters		Compliance Points	
Core Labour	1	Child labour	1.	Child Labourers
			2.	Unconditional Worst Forms
			3.	Hazardous Work
			4.	Documentation and Protection of Young Workers

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

Calculating non-compliance

In public synthesis reports, Better Work reports on 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 labour 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.

³ In Better Work country-specific questionnaires, a compliance point “Other Grounds” may be included under the Discrimination cluster. This category is intended to assess specific discrimination issues that are covered in national labour law, and are considered to be aligned with the objectives of the relevant ILO conventions (100 and 111), but which are not explicitly named in the conventions, e.g., age, HIV/AIDS status, disability, etc. The questionnaire for Haiti does not include the “Other Grounds” compliance point because the Haitian labour law does not identify grounds for discrimination beyond those cited in Conventions 100 and 111.

⁴ Since the 8th Better Work Haiti synthesis report, Better Work Haiti only reports non-compliance with the minimum wage of reference of 225 Gourdes (as of 1st May 2014). The reporting on the production wage of 300 Gourdes will be done with specific details on each factory’s percentages of workers’ average earnings in the factory tables in section V of the report.

The non-compliance rate does not sufficiently describe the specific issues that Enterprise Advisors (EAs) observe during assessments. In order to address this, tables presenting non-compliance findings in more detail are also presented in Section II (see “In Focus” tables). These tables allow the reader to fully appreciate specific challenges in compliance identified in factory assessments. In Focus tables report the number of factories found to be non-compliant with respect to each highlighted question.

Better Work and public reporting

The Better Work program supports fair and transparent public reporting. In all Better Work country programs, synthesis reports on the industry are prepared on the basis of the individual factory assessment reports and published twice a year. Evidence shows that public reporting of this kind helps encourage continuous improvement and reduces the probability of reversing compliance gains. Gathering and reporting these data over time enables factories to demonstrate their efforts to improve working conditions.

In July 2010, Better Work Haiti published an initial compliance synthesis report, which featured aggregated compliance information based on factory assessments conducted by the program between October and December 2009. In October 2010, Better Work published its first Biannual Report under the HOPE II legislation, the first report produced under the requirements of the legislation (see Annex 1). Subsequently, Better Work Haiti produced the second (April 2011), third (October 2011), fourth (April 2012), fifth (October 2012), sixth (April 2013), seventh (October 2013), eighth (April 2014), ninth (October 2014) and tenth (April 2015) Biannual Reports, as required by the HOPE II legislation.

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

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 abovementioned labour standards, and gathering general information about the factory.⁵ Information is gathered through a variety of sources and techniques, including document review, observations on the shop floor, and interviews with managers, workers and union representatives. 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 considered a common problem in the industry in general. Nevertheless, after eleven assessments conducted over

⁵ Better Work has recently published the list of questions from its Compliance Assessment Tool (CAT) including their legal references. It can be accessed here: http://betterwork.org/haiti/?page_id=1731

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

Among the issues covered in Better Work Haiti's compliance assessment tool, sexual harassment, similarly to other countries, is one of the most sensitive and most difficult 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. 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.

Assessing compliance with freedom of association at the enterprise level also presents challenges, in part because some labour unions are organized at the sectoral level rather than at the factory level where small union cells predominate.

Simple auditing of factory compliance has been widely acknowledged to be limited in rectifying compliance issues. Factories wishing to cheat the auditing system are able to do so without focusing on the long-term business benefits of improving their working conditions. In Haiti, factories have been assessed twice yearly, double the number of assessments that factories in other Better Work country programs receive. As a result, the Better Work Haiti program did not have sufficient time and resources to provide sufficiently effective advisory services between assessments. This led to areas of non-compliance being remediated in an unsustainable manner. Factories with well-established management systems can ensure that compliance improvements are sustainable in the long run. Therefore, Better Work recognizes the necessity to shift its focus and to provide more in depth advisory services to assist factories to address root causes of non-compliance issues and find long-term solutions. As of spring 2015, Better Work started the rollout of its revised service delivery model with a stronger focus on advisory services in all Better Work country programs including Haiti. Moreover, in Haiti, the establishment of Performance Improvement Consultative Committees (PICCs), which has only recently started to pick up, will gradually move advisory services to the next level as these bipartite committees will further promote the good practice of social dialogue at the factory level.

Better Work's Service Delivery Model

Since Better Work's establishment, compliance with labour laws and international standards has improved across all country programs. In its initial phases (phase I: 2007 - 2009 / phase 2: 2009 - 2012), the Better Work program has collected lessons learned from its various country operations. In order to carry the program into its third phase, Better Work underwent an independent evaluation, which made a series of key recommendations. One of the main suggestions was that Better Work should advance and

restructure its services to increase the onus of responsibility for change onto the factory personnel that Better Work staff engages with.

Subsequently and in line with this recommendation, the Better Work's service package of assessment, advisory and training services has been revised in close consultation with all of the program's constituents. Each Better Work country program has developed its own roll-out plan to incorporate the various components of this new approach which focuses on management systems and aims at increasing factory ownership through improved relations between management and workers.

The revised service delivery model is putting stronger emphasis on a systems-based approach that builds factory ownership over time, without losing the essential element of assessments, which is the program's objective measure of outcomes in improving working conditions. The revised service delivery model is meant to improve and allow Better Work services to work together more effectively. In Haiti, this can only be achieved through a shift of focus from a heavy assessment-centered approach to more in depth advisory and training services. Therefore, starting with the completion of the 10th round of assessments by Better Work Haiti and the publication of this tenth compliance synthesis report in April 2015, the program has transitioned to one assessment per factory per year and stronger focus on advisory services and management systems.

The adjusted service delivery model consists of the same core services that Better Work offered previously: assessments, advisory and training services. The sequence and format of all of these services are adjusted to deliver a more comprehensive package to all participating factories.

As of the 11th Better Work Haiti cycle, a factory cycle will no longer start with an assessment on which advisory services afterwards were built in the initial approach. Under the adjusted model, the cycle will now start 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.

Under the revised service delivery model, Better Work reporting has two elements – reports completed and verified by the 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. In the 11th month of the cycle, Better Work will then publish a progress report, detailing improvements on compliance issues, as well as in-factory dialogue and the use of effective management systems.

Better Work will also provide additional recommendations to further strengthen the improvement process.

Factory reporting is published approximately 5 months after the start of the cycle. This report will include progress to date on all self-diagnosed issues as well as those identified by Better Work during the assessment. This report will be available to authorized buyers and will indicate initial progress and

planned steps for the remainder of the year. 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.

Implications of the Revised Approach for Public Reporting under HOPE II

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 garment factories exporting under the HOPE II law on compliance with international core labour standards and national Haitian labour law, (ii) assists these factories on their remediation efforts and (iii) provides capacity building to the Government of Haiti on these aspects. The requirements of the HOPE II law with regards to biannual reports being published by the entity operating the TAICNAR program are quoted in annex 1 (HOPE II Legislation Reporting Requirements).

The change in Better Work's service delivery model described above will not derogate these requirements of the HOPE II legislation. Public biannual synthesis reports will continue to be published on the 16th of April and the 16th of October of each year. The findings from each factory's annual assessment will be reported in one of these two synthesis reports including the date of each factory's assessment. The report following 6 months later will contain information from advisory services, especially with regards to remediation efforts by the factory concerning the non-compliance issues identified in the past assessment. Therefore, information provided will actually exceed the HOPE II requirements of reporting on the preceding 6 months period as progress will be stated over an entire 12 months period. This longer cycle will give factories more opportunities to work with their assigned Better Work Enterprise Advisor to find long-term solutions for weak management systems, which are at the root cause of recurrent non-compliance issues.

Section II: Findings

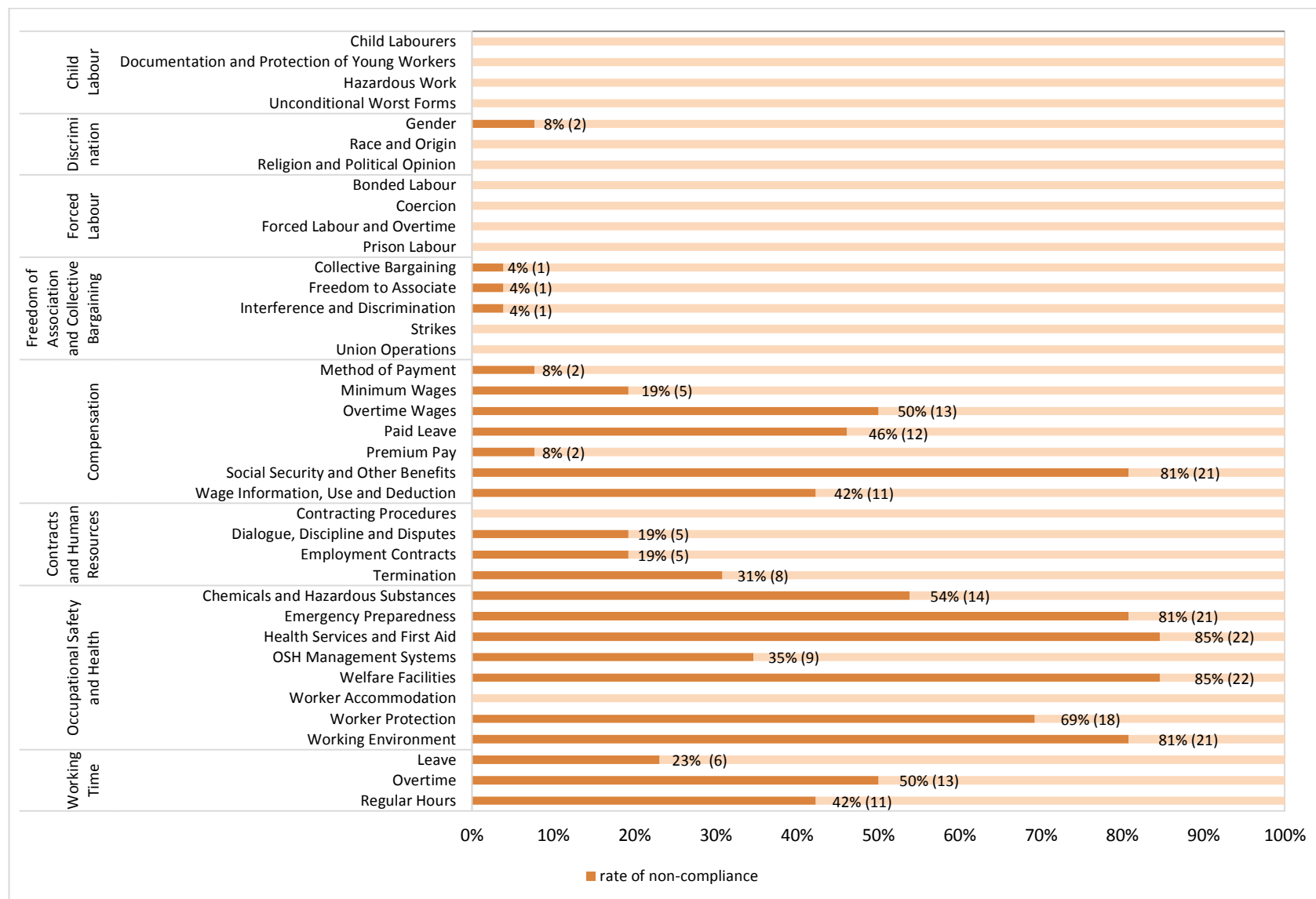
2.1. Compliance Assessment Findings (10th and 11th round of assessments)

Non-compliance rates

Chart 1 presents non-compliance findings for the 26 assessed factories in Haiti, showing non-compliance rates as well as the number of factories in non-compliance in brackets.

Key findings are provided in Section 2.2 below. In Focus Tables provide additional information for Compliance Points, at the question level, where a significant number of factories was out of compliance.

Chart 1: Non-compliance rate*



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

2.2. Detailed Findings

1. Core labour standards

During the last round of assessments, which took place between September 2014 and August 2015 in 26 factories, the following results have been observed.

A. CHILD LABOUR

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

B. DISCRIMINATION

Two factories were identified as non-compliant under Discrimination Cluster and both cases relate to gender. In one factory, a female worker was fired shortly after she had submitted a medical certificate stating her pregnancy (20th week). The worker had just been newly hired by the factory a month prior to that and the factory fired her without receiving prior authorization by the Ministry of Labour. Management stated that the termination was due to the fact that she was not able to perform the work she was assigned. Also, they stated that the woman had misled the factory regarding her ability to work, as she did not declare her pregnancy during the recruitment process. However, no proof of the woman's inability to perform her work was found in her file.

A second case of discrimination was identified in another factory where a case of sexual harassment was identified during an assessment. A new female worker with only one month of service reported to the HR department that one of the foreign supervisors had been harassing her sexually during her training period in the sewing line she was assigned to and in a sampling room she was moved to later on. The worker explained that she finally reported the case to HR after the supervisor entered the room and locked the door during break time, when all workers were going outside, and asked her to perform a sexual act on him. The worker also explained that she had not reported the case earlier because she was not aware of the policies in place to tackle such abuses.

After reporting the case to the HR Department, the managers in that plant conducted their own investigation. Interviewed HR and General Manager stated that they had not found any grounds to take further action against the accused supervisor, due to a lack of evidence. When questioned, the supervisor completely denied any misconduct during his work with that worker. Compliance managers reported during the interview with EAs that it was difficult to find the truth. Better Work found non-compliance based on lack of effective action to address the situation and weak enforcement of procedures in place in the Plant 4. The factory has an anti-sexual harassment policy in place and posters are displayed on communication boards throughout the Plant. However, interviews with workers revealed that workers were not fully aware of the factory's policy on sexual harassment.

Management acknowledged that despite sexual harassment being part of the induction training for all workers, more communication is necessary to reinforce this policy on both supervisors' and workers' side.

C. FORCED LABOUR

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

D. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

There are three instances of non-compliance in this reporting period under the Cluster for Freedom of Association and Collective Bargaining. Three non-compliance points have a non-compliance rate of 4% each: (i) Collective Bargaining, (ii) Freedom to Associate and (iii) Interference and Discrimination.

In one factory, as illustrated in previous public reports, the non-compliance finding is due to a failure to implement certain provisions of the CBA in force.

Both other non-compliance findings relate to the same situation at a factory where a sewing operator was terminated in August 2014. This worker who had started to work in the factory in May that same year, was a union member. Neither the worker nor the union had provided the factory any formal notification of the worker's union affiliation. The worker's file showed that this termination was related to lack of work. There were no disciplinary warnings in the worker's file. Management stated that this worker was among the workers selected for termination as he had less than three months in the factory. One day after his termination, the union sent a letter to the factory's management requesting a meeting in order to discuss the case of the terminated worker, stipulating in the letter that this worker was one of their representatives. Since then many discussions have been held with the factory in which they repeatedly agreed to reinstate this worker. Yet at the time of the assessment, the worker had not been reinstated. The factory was found in non-compliance for Freedom to Associate ("Can workers freely form and join the union of their choice?") as well as Interference and Discrimination ("Has the employer terminated workers or not renewed a worker's employment contract due to the worker's union membership or activities?") for this case.

2. Working conditions

E. COMPENSATION

In the compensation cluster, the highest numbers of non-compliances persist in the Compliance Point on Overtime Wages (50%) and the one on Social Security and Other Benefits (81%), as well as the Compliance Point on Wage Information Use and Deduction (42%). The issues are detailed in the tables below.

In Focus 1 : Overtime Wages

<i>Question</i>	<i># factories out of compliance</i>
Does the employer pay workers 100% above the normal wage for all overtime hours worked at night?	7
Does the employer pay workers 100% above the normal wage for overtime hours worked on legally mandated holidays?	2
Does the employer pay workers 100% above the normal wage for overtime hours worked on weekly rest days?	1

Does the employer pay workers 50% above the normal wage for all ordinary overtime hours worked?

6

The number of factories in non-compliance under the compliance point for overtime payments is highest for payments of overtime hours worked at night. Seven factories fail to pay workers an additional 50% for work conducted after 6 pm as required by the law. A similar situation was observed in two factories for payments of overtime hours worked on legally mandated holidays and in one factory for payment of overtime hours workers worked on the weekly rest day. It has to be noted that in some of these cases, cash payments to workers without appropriate recording of these payments in the payroll is a practice still common in these factories.

Six factories have been found non-compliant for payment of 50% above the normal wage for ordinary overtime hours worked. These cases mainly relate to security guards who have a fixed salary that does not reflect the overtime hours which are included in their regular working time schedule. In previous rounds of assessments, the security guards had not consistently been part of the assessments by Better Work but that this approach had been revised as of May 2015.

In Focus 2 : Social Security and Other Benefits

Question	# factories out of compliance
Does the employer collect and forward workers contributions to OFATMA?	11
Does the employer collect and forward workers' contributions to ONA?	12
Does the employer pay 3% of workers' basic salary to OFATMA for maternity and health insurance?	13
Does the employer pay 3% of workers' basic salary to OFATMA for work-related accident insurance?	4
Does the employer pay the required employer contribution to ONA?	12
Does the employer pay workers their annual salary supplement or bonus?	5

The number of factories in non-compliance for the payments to OFATMA represents the highest figure under this compliance point; 50% of assessed factories do not pay the contributions to OFATMA for the newly offered maternity and health insurance which is effective as of December 2014. Twelve factories have also been found non-compliant for payments of workers' and employers' contributions to ONA (pension funds). Among these, the majority of non-compliances identified relate to late payments of these contributions. The Haitian Labour Code requires that payments (six percent of the basic salary to be paid by employees and 6 percent of the basic salary to be paid by the employers) are being made within the first ten working days of each month for the previous month.

Among the four factories which are in non-compliance for the payments for work-related accident insurance, two factories have never paid their contributions OFATMA, explaining that they did not wish to contribute the OFATMA, because they are not satisfied with the services offered. The other non-compliances reported here relate again to delays in the payments of mandatory contributions.

In Focus 3: Wage Information, Use and Deduction

<i>Question</i>	<i># factories out of compliance</i>
Does the employer keep only one accurate payroll record?	11
Does the employer properly inform workers about wage payments and deductions?	0
Has the employer made any unauthorized deductions from wages?	1

In eleven cases, Better Work has identified incomplete payroll records. Factories concerned by this non-compliance finding keep payroll records which do not reflect all of the hours actually worked. Such cases have particularly been identified during overtime hours worked at night, on public holidays or the weekly rest days for which the employer pays an additional amount in cash to the workers without the adequate records in the payroll system.

Once factory has also been found non-compliant under this compliance point for non-authorised deductions from workers' wages which were disguised as disciplinary actions against the provisions of the law.

Minimum Wage

It has to be noted that during recent assessments five factories were identified as non-compliant regarding the minimum wage. In one case, a factory had not yet transitioned to the newly announced minimum wage of 240 Gourdes as of May 2015 (see page 9) at the time of the Better Work assessment. The other four cases relate to factories which had indeed transitioned to the new minimum wage but had not applied it systematically to all workers. In all four cases, security personnel had not yet received the increased amount of 240 Gourdes for eight hours of work.

As announced in the 8th biannual public synthesis report, the compliance point on the production wage (piece rate) has been removed from Better Work's compliance assessment tool in the Compensation cluster. However, Better Work continues to collect data from each factory on the percentages of piece rate workers' earnings. With the newly announced minimum wage as of May 2015 (240 Gourdes and 320 Gourdes for production for 8 hours of work), the categories Better Work reports on, have been adjusted. Previously, three categories have been presented (225-249/250-299/300 and more Gourdes per day) whereas now, Better Work will only refer to the percentage of workers reaching the defined production wage (until May 2015, 300 Gourdes; as of May 2015 320 Gourdes per eight hours of work) in this section.

Table 2 : Weighted percentage of piece rate workers earning 300 (320 as of May 2015) Gourdes per eight hours of work across all factories assessed by Better Work ⁶

Synthesis Report Publication	Weighted percentage of piece rate workers earning 300 (320 as of May 2015) Gourdes per eight hours of work across all factories assessed by Better Work
April 2014 (8th BW synthesis report)	29%
October 2014 (9th BW synthesis report)	37%
April 2015 (10th BW synthesis report)	41%
October 2015 (11th BW synthesis report)	38%

F. CONTRACTS, AND HUMAN RESOURCES

The highest non-compliance ratings in the cluster on Contracts and Human Resources is under the Termination Compliance Point (31%). 19% non-compliance ratings were identified for the Compliance Point Dialogue, Discipline and Disputes as well as Employment Contracts respectively.

In Focus 4: Dialogue, Discipline and Disputes

Question	# factories out of compliance
Did the employer resolve grievances and disputes in compliance with legal requirements?	0
Do the disciplinary measures comply with legal requirements?	3
Have any workers been bullied, harassed, or subjected to humiliating treatment?	3

Three factories have been found non-compliant for having applied disciplinary measures that are not in line with the labour law or internal rules approved by the Ministry of Social Affairs and Labour. In three different factories, workers reported having been the subject of humiliating treatment from their direct supervisor.

G. OCCUPATIONAL SAFETY AND HEALTH (OSH)

⁶ Better Work collects the percentages of piece rate workers per factory who earn 300/ 320 Gourdes or more during eight hours of work (excluding workers who have been recruited within the past 3 months, or those who have been using their equipment for 3 months or less). The calculations are based on average earnings. Please note that the percentages provided in this table are being calculated as weighted averages, taking into consideration the different factory sizes and their respective number of piece rate workers and figures are based on the last assessment conducted by Better Work at each facility.

Occupational Safety and Health remains the Cluster with the highest percentages of non-compliance. Four Compliance Point show a non-compliance rate of 80% or higher. Further details on the specific non-compliances are indicated in the tables below.

In Focus 5: Chemicals and Hazardous Substances

Question	# factories out of compliance
Are chemicals and hazardous substances properly labelled?	6
Are chemicals and hazardous substances properly stored?	6
Does the employer have chemical safety data sheets for all the hazardous chemicals used in the workplace?	10
Does the employer keep an inventory of chemicals and hazardous substances used in the workplace?	2
Does the employer provide adequate washing facilities and cleansing materials in the event of exposure to hazardous chemicals?	11
Has the employer effectively trained workers who work with chemicals and hazardous substances?	1
Has the employer taken action to assess, monitor, prevent and limit workers' exposure to chemicals and hazardous substances?	3

The absence of appropriate management systems continues to be the main reason why factories fail to ensure that chemical containers are permanently labelled, the safety data sheets (MSDS) available at any time and the inventories always kept up to date. Frequent changes of staff in charge of Occupational Safety and Health (OSH) at the factories as well as the continuous use and replenishment of these substances contribute to the high rates of non-compliance in this area. Six factories are in non-compliance for the labelling and the correct storage of chemicals and hazardous substances, and ten do not have the FDS mandatory for the latter. The Better Work assessors have also found that eleven factories did not have enough or not well equipped eye washing. Three factories have taken insufficient provisions to control the exposure of workers to chemical substances. These factories that use chemicals and hazardous substances do not have adequate ventilation in the workplace and workers exposed to these substances do not benefit from periodic medical examinations as required by the law. With respect to the effective training of workers who use chemicals and hazardous substances, only one factory is found in non-compliance, which represents a net decrease of the rate of non-compliance for this issue compared to previous assessments.

In Focus 6: Emergency Preparedness

Question	# factories out of compliance
Are emergency exits and escape routes clearly marked and posted in the workplace?	9
Are flammable materials safely stored?	3
Are possible sources of ignition appropriately safeguarded?	2
Are the emergency exits accessible, unobstructed and unlocked during working hours, including overtime?	8
Are there enough emergency exits?	2
Does the employer conduct periodic emergency drills?	5

Does the workplace have a fire detection and alarm system?	8
Does the workplace have adequate fire-fighting equipment?	11
Has the employer trained an appropriate number of workers to use the fire-fighting equipment?	4

Nine factories did not have evacuation plans accurately reflecting the emergency routes of the place of work and/or they lacked signs indicating emergency exits correctly, or these signs were not in good condition. In the three factories in which flammable substances were not properly stored, containers of solvents (Thinner) have been found in places which do not meet the standards of storage for chemicals. In two factories the assessors found that possible sources of ignition/ fire were not properly secured as mobile phones were charged with cables in close proximity to flammable materials such as fabrics.

Fire detection and alarm systems were found to be insufficient in eight factories and fire-fighting equipment was equally found in non-compliance in eleven factories. In most cases, the number of fire extinguishers was insufficient or low pressure was found on individual fire extinguishers.

In Focus 7: Health Services and First Aid

Question	# factories out of compliance
Do workers have a medical check within the first three months of hiring and annual medical checks?	14
Do workers who have been exposed to work-related hazards receive free health checks?	4
Does the employer address safety and health risks to pregnant or nursing workers?	1
Does the workplace have required onsite medical facilities and staff?	18
Has the employer ensured there are a sufficient number of readily accessible first aid boxes/supplies in the workplace?	6
Has the employer provided first-aid training for workers?	5

Eighteen factories in total are in non-compliance because they did not have the number of medical facilities and/ or medical personnel required by the law. Although a requirement of the legislation of the Haitian labour law, many factories chose to not hire the expected number of medical personnel, because the current demand for such services does not justify the hiring of additional staff. The Haitian legislation requires the presence of one nurse onsite in factories of 50 to 200 employees, two nurses for the factories of 200 to 500 employees, and an additional nurse for all 200 additional employees. In addition, factories with less than 200 workers must provide three weekly doctors' visits, and factories with more than 200 employees must have medical services on site at all times.

Fourteen factories were non-compliant and did not organizing annual medical checks or checks within the first three months of hiring. According to the Haitian Labor Code, annual medical examinations fall under the responsibility of the Haitian government institution OFATMA. However, these services are not sufficiently offered by OFATMA to cover existing needs. Since the launch of OFATMA's maternity and health insurance, OFATMA has shared a list with all doctors and medical service providers which are affiliated to their network. Yet, no concrete suggestion has yet been made as to how the regular medical checks of workers are to be covered. On 15 September, the Haitian Employers Association (ADIH) met

with OFATMA to share their concerns with regards to the introduction of the new health and maternity insurance by OFATMA.

First aid boxes were not readily accessible or were missing adequate content in six factories. With regards to workers trained on first aid, all factories do perform such trainings, yet in five cases the factories failed to train the 10% of the workforce as recommended by Better Work.

In Focus 8: Welfare Facilities

Question	# factories out of compliance
Does the employer provide workers enough free safe drinking water?	4
Does the workplace have adequate accessible toilets?	19
Does the workplace have adequate hand washing facilities and adequate soap?	6
Does the workplace have all required facilities?	0
Does the workplace have an adequate eating area?	10

Under Welfare Facilities, non-compliance rates remain relatively high due to reasons described in previous reports related to the number of toilets, missing soap and insufficient adequate eating areas in factories.

In nineteen cases, factories are found in non-compliance in relation to the quantity of toilets available in the workplace in relation to the requirements of the law. The Labour Law requires a toilet for every 25 men and a toilet for every 15 women. As this requirement is relatively high, Better Work also verifies the proper operation of the existing toilets, and whether or not there are any queues in front of the toilets, which is rarely the case.

All of the factories have appropriate hand washing facilities for their workers. However, six factories do not provide soap at all times. Although all factories provide free drinking water to their workers, four factories do not test the quality of the water on a regular basis. Among the ten factories that are in non-compliance for the eating area, four do not have such an eating area at all and the remaining six do have an eating area, yet it is not big enough to accommodate the entire workforce.

In Focus 9: Worker Protection

Question	# factories out of compliance
Are appropriate safety warnings posted in the workplace?	5
Are electrical wires, switches and plugs properly installed, grounded, and maintained?	7
Are proper guards installed and maintained on all dangerous moving parts of machines and equipment?	12
Are workers effectively trained and encouraged to properly use personal protective equipment and machines?	7
Are workers punished if they remove themselves from work situations that they believe present an imminent and serious danger to life or health?	1
Does the employer comply with ergonomic requirements?	8
Does the employer provide workers with all necessary personal protective clothing	11

and equipment?

The assessors found twelve factories in which not all the machines and equipment had all the appropriate guards installed on all dangerous moving parts. The guards often break and require regular verification and maintenance which is why non-compliance on this point tends to be high. Many factories do not have effective mechanisms to monitor this situation in a systematic way and to review the protections of machines on a regular basis. The factories also depict the lack of availability of certain parts among the suppliers, especially for very old machines. Under the revised Better Work service delivery model extensively described throughout this report, Better Work seeks to strengthen management systems in the factories in order to bring lasting solutions to this kind of non-compliance.

In eleven factories, the employer had not provided to workers all the necessary protective equipment recommended for their respective positions and seven factories have not effectively form the workers to the use of personal protective equipment as well as to the safe use of machines and equipment. The problem of training is often coupled with the lack of equipment as it is pointless to train workers if the protective equipment is not available. 8 Factories are non-compliant with respect to ergonomic requirements, including for the provision of chair to folders for all the workers and as well as the anti-fatigue mats and/or foot-rests for the workers standing up.

Five factories have not displayed the signs necessary security on the electrical boxes and seven factories have been found non-compliant because they do not provide a sufficient maintenance of their electrical installations. In effect, in these factories the evaluators observed, electrical wires exposed in the boxes or electrical equipment. A plant is in non-compliance for having blamed the workers who refused to work in a room where cleaning or ventilation was not sufficient to evacuate the odour released by the solvents used (Thinner).

In Focus 10: Working Environment

<i>Question</i>	<i># factories out of compliance</i>
Are noise levels acceptable?	1
Are the temperature and ventilation in the workplace acceptable?	16
Is the workplace adequately lit?	18
Is the workplace clean and tidy?	2

With regards to the Working Environment, Better Work measures noise, light and temperature levels at the factory in different sections and on different times of the day. Better Work standards are based on the ILO Code of Practice and ILO Caribbean Office OSH Program materials.

Temperature and ventilation levels were found to be too high in 16 factories. Better Work recommends a maximum of 30 degree Celsius. Light levels have different standards depending on the section in which the lux levels are measured. A total of 18 factories were found to be non-compliant on light levels.

Only one factory continued to have noise levels exceeding the recommended maximum of 90 Db.

Light, temperature and ventilation levels often relate to structural conditions of the factory buildings.

In the case of rental buildings, factory management is not willing to invest substantial amounts in structural changes most of the time.

H. WORKING TIME

The highest non-compliance finding in the Working Time Cluster is in the Overtime CP (50%).

In Focus 11: Overtime

<i>Question</i>	<i># factories out of compliance</i>
Does the employer comply with limits on overtime hours worked?	10
Does the employer obtain authorization from the Department of Labour before working on Sundays?	4
Does the employer obtain authorization from the Department of Labour before working overtime?	5
Is overtime work voluntary?	0
In ten 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. Five factories were found in non-compliance because they failed to obtain authorisation from the Ministry of Social Affairs and Labour (MAST) prior to working overtime and four factories failed to obtain that authorisation by the government prior to working on Sundays.	

In Focus 12: Regular Hours

<i>Question</i>	<i># factories out of compliance</i>
Do regular daily or weekly working hours exceed the legal limit?	0
Does the employer comply with the daily break period?	1
Does the employer give workers at least one day off per week?	0
Does the employer keep working time records that reflect the hours actually worked?	10

As in previous cycles, ten factories are found non-compliant for the question whether the employer keeps working time records that reflect the hours actually worked. In several factories, Better Work assessor found that working hours worked at night, on legal holidays or the weekly rest day are recorded separately or not included in the factory's main attendance records. These non-compliances testify of relatively weak registration systems for working hours at these factories which do not allow to capture the actual operating hours of their personnel. In fact, two factories still use a manual attendance record system. Among the other eight which use electronic systems, there is an insufficient coordination with the production department in order to ensure that working hours worked exceptionally on holidays or weekly rest days are adequately captured in the records.

2.3. Compliance effort

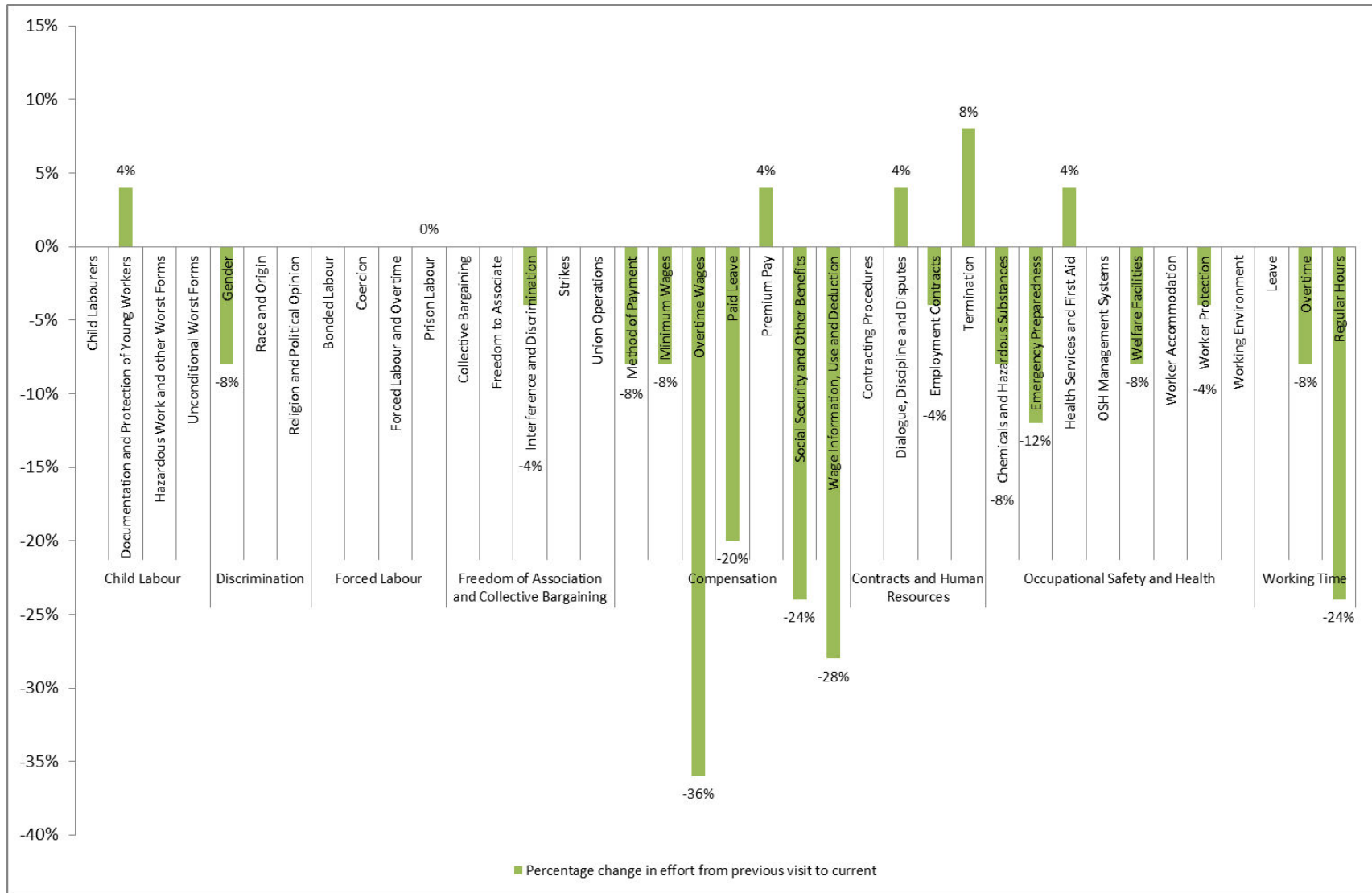
Compliance effort relates to the changes in non-compliance for each compliance point (CP) between the previous round of assessments and the present one. Compliance effort refers only to the factories that were registered with Better Work Haiti in both reporting periods and so the compliance data for 25 factories is included in this chart. Val d'Or Apparel has only been assessed once and therefore it is not included in this chart on compliance efforts.

It also must be noted that, as the compliance effort is an aggregate indicator for all factories that have been assessed at least twice by Better Work Haiti, it is sensitive to simultaneous improvements and declines in non-compliance. For example, if a factory moves from being non-compliant to compliant and another factory that had no non-compliance findings now is non-compliant in the same CP, the two would level each other out with no change in compliance effort. Under each compliance point, several questions can lead to a factory's non-compliance on this particular CP. It is also important to note that due to the small sample of factories (25), a change in compliance for one factory, leads to a 4% change, two factories leads to 8% etc.

The major findings regarding significant compliance changes are summarised in the bullet points below. For further details, please refer to the in focus tables in the previous section.

- Documentation and Protection of Young Workers: One additional factory put in place a reliable system to verify the age of workers prior to hiring.
- Method of Payment: In two factories, workers' full wages were not paid directly to them at the workplace on a working day.
- Overtime Wages: Four additional factories were found non-compliant and did not pay workers 50% above the normal wage for all ordinary overtime hours worked.
- Paid Leave: Six additional factories did not pay workers correctly during sick leave.
- Premium Pay: Three additional factories paid workers 50% above normal wage when workers worked regular hours on legally mandated holidays.
- Social Security and Other Benefits: Fourteen additional factories did not pay 3% of workers' basic salary to OFATMA for maternity and health insurance.
- Wage Information, Use and Deduction: Seven additional factories did not keep only one accurate payroll record.
- Chemicals and Hazardous Substances: Six additional factories did not have chemical safety datasheets for all the hazardous chemicals used in the workplace.
- Emergency Preparedness: Five additional factories were found to not be conducting periodic emergency drills
- Welfare Facilities: Three additional factories were found to be clean and tidy.
- Overtime: In three additional factories, employer did not comply with limits on overtime hours worked.
- Regular Hours: Five additional employers kept working time records that did not reflect the hours actually worked.

Chart 2: Compliance Effort



Section III: Better Work Haiti Advisory Services and Training

3.1 Better Work Haiti Advisory Services

This section highlights the advisory and training services undertaken by Better Work Haiti during the period of March to August 2015. With the rollout of the revised service delivery model by Better Work in all of its country programs, the importance of advisory services - among the three Better Work core services assessment, advisory and training services - has been emphasized even more. 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 adjustments in the services that Better Work delivers to factories provide opportunities for the program to work with factories on root causes that are underlying repeated non-compliance issues. Under the revised approach, factories undergo an initial period of advisory services in which a designated Enterprise Advisor supports the factory on a one-on-one coaching basis before the independent Better Work assessment is being carried out. In this initial advisory period, the Advisor assists the factory to set up the bipartite worker - management committee PICC (Performance Improvement Consultative Committee). Through interactive exercises, the worker-management committee identifies where the factory may need improvements in terms of labour compliance, management systems and training needs and sets targets. This work also extends to the Advisor reviewing the committees own effectiveness. The committee then initiates and realizes early improvements. The factory is responsible for the quality of these improvements. Through this process of self-diagnosis and early remediation, Better Work aims to increase ownership, accountability, dialogue and partnership. After the 100 day period concludes, Better Work conducts its independent assessment of the factory's compliance performance. The annual cycle then continues with advisory and training services. .

In Haiti, Better Work launched the rollout of the revised model in April 2015 through an industry seminar. Subsequently, the set-up of PICC in factories continued together with the introduction of the self-diagnosis process. At the time of writing of this report, 15 factories have set up a PICC in their factory as indicated in the table below which states the status of the PICC in each of the factories participating in the Better Work program.

	Name of factory	PICC Status
1.	Caribbean Island Apparel S.A.	Set up and functioning
2.	CODEVI	No PICC yet
3.	DKDR HAITI S.A.	Set up and functioning
4.	Fairway Apparel S.A.	Set up and functioning
5.	Fox River Caribe, INC	Set up and functioning
6.	Genesis S.A.	Currently out of operations
7.	Gladiator Textiles LLC	Currently out of operations
8.	Global Manufacturers & Contractors S.A.	No PICC yet

9.	Goal Export S.A.	Set up and functioning
10.	H&H Textiles S.A.	No PICC yet
11.	Horizon Manufacturing S.A.	Set up and functioning
12.	Indigo Mountain Haiti S.A.	No PICC yet
13.	Industrial Revolution II S.A.	Currently out of operations
14.	Interamerican Wovens S.A.	Set up and functioning
15.	Johan Company	Currently out of operations
16.	Life S.A.	No PICC yet
17.	Modas BU IL Haiti S.A.	Set up and functioning
18.	MGA Haiti S.A.	Set up and functioning
19.	Multiwear S.A.	Set up and functioning
20.	Isis Apparel S.A. (former One World Apparel)	Set up and functioning
21.	Pacific Sports Haiti S.A.	Set up and functioning
22.	Palm Apparel S.A.	Set up and functioning
23.	Premium Apparel S.A.	Newly set-up
24.	Quality Sewing MFG. S.A.	No PICC yet
25.	Sewing International S.A.	No PICC yet
26.	Seed Apparel S.A.	Currently out of operations
27.	The Little Haitian Factory S.A.	Set up and functioning
28.	S&H Global S.A.	Set up and functioning
29.	Textiles Youm Kwang S.A.	No PICC yet
30.	The Willbes Haitian II S.A.	No PICC yet
31.	The Willbes Haitian III S.A.	No PICC yet
32.	Val D'Or Apparel MFG Haiti S.A.	Set up and functioning

All of these fifteen factories have started to work on the self-diagnosis process. Five factories have submitted an initial report about their self-diagnosis which will be shared with buyers as well.

After Better Work's assessment, advisory services continue. The designated Enterprise Advisor continues to assist the bipartite committee to hold regular meetings, follow up on issues identified through self-diagnosis by the PICC as well as by Better Work's assessors and remediation of these issues.

3.2 Better Work Haiti Training Services

In addition to factory assessments and advisory work, the Better Work program has designed a range of trainings intended for workers, line supervisors and managers. In summer 2015, the Better Work Haiti training team conducted a survey among factories to identify training needs. One priority emerging from the survey clearly emphasized the need for more training for middle management in Haitian factories. A new training catalogue with all training modules available in Haiti was hence released and can be

accessed online.⁷ Newly launched trainings by the Better Work team include workers' rights & responsibilities, negotiation skills training and a new two day long training for Human Resource Managers.

In addition, GAP Inc. released funds to four of the eight Better Work country programs for various trainings on workplace cooperation. In Haiti, these funds are being used to finance the PICC trainings, negotiation skills trainings, grievance mechanism industry seminar (to be held in October) and in the future a training on Industrial Relations. Industry seminars are industry-wide seminars on particular topics which will be attended by management and/ or worker representatives. The objective of such trainings with participants from different factories is supposed to increase learning effects, as participants will be able to exchange and learn from each other on best practices.

Since the beginning of 2015, the Better Work Training Team trained 1235 participants in the various trainings offered to factories. 635 training participants were women, 630 men.

As of May 2015, Better Work has been using a training room inside the Metropolitan Industrial Park SONAPI in Building 48. CTMO-HOPE and the Office of the Labour Ombudsman who are using this space for their offices have signed an agreement with Better Work on the use of one of the rooms for training purposes. This facilitates some of the logistical challenges that Better Work was facing in the past concerning trainings offered to factories. The room in Building 48 is also used on weekends and allows for participants from different factories to come together on neutral grounds.

Section IV: Conclusions and Next Steps

4.1 Conclusion

Overall, Better Work observes an increased level of engagement of all actors in the sector to contribute to improvements of the competitiveness of the Haitian garment sector. The HOPE II/HELP legislation and its recently approved extension until 2025 has opened unique opportunities for Haiti's garment industry. International textile brands have shown an increasing interest in Haiti as a sourcing destination. Several brands have been on scoping missions to Haiti in the past months, others which are already sourcing in country, are looking into expanding their supplier base in Haiti. This perspective offers a great chance for the various stakeholders of the industry to work together on improvements needed to increase the competitiveness of Haiti's garment industry in comparison with others in the region and the world. Necessary improvements comprise changes in national legislation, infrastructural challenges as well as capacity building needs of workers and middle management in the factories. Also, the maturity of Haiti's industrial relations will be crucial in order to grow this industry to the benefit of the country's socio-economic development.

The engagement of the Ministry of Social Affairs and Labour and the Ministry of Commerce in activities related to the garment industry will send an important signal to the international community about the disposition of the government of Haiti to attract and keep foreign investment.

⁷ http://betterwork.org/haiti/?page_id=65

4.2 Next Steps

Better Work will continue to use its work at the factory and the sectoral level to promote the respect of international and national labour laws, social dialogue, ownership and accountability of its national partners. Through the collaboration with the Ministry of Social Affairs and Labour (MAST), the ILO will also continue to strengthen the capacities of the national government partners in terms of labour inspection and their conciliation and mediation services. The harmonious and fruitful collaboration with the Office of the Labour Ombudsman and the social dialogue table will further contribute to strengthen more mature industrial relations in the garment sector.

Promoting a positive culture of change lies at the heart of Better Work's adjusted service delivery model. Its successful launch in 2015 with the majority of factories in Haiti has shown the promising success of the revised approach in which factories are taking on ownership for the improvement process. Better Work will continue to partner with factories and buyers in this process and will provide support according to each factory's need.

Section V: Factories in Detail

5.1 List of factories

As of September 2015, 32 factories are registered with Better Work Haiti. However, six out of these factories have ceased operations (or not started yet) over the past months. These factories are Genesis S.A., Gladiator Textiles LLC, Industrial Revolution II S.A., Johan Company, Seed Apparel S.A., The Little Haitian Factory S.A.

The Haitian Employers' Association (Association des Industries d'Haiti - ADIH) has started to update the employment figures for the garment industry on a monthly basis. Better Work Haiti is collaborating with ADIH on updating and aligning these figures regularly. In ADIH's latest publication of the figures for August 2015, 40,904 employees were registered in all Haitian factories.⁸ Yet, it has to be noted that this figure includes the administrative staff of these factories as well. From previous years of data collection, BWH knows that the administrative staff for all factories accounts to approximately 10-15% of the total employee figure. Also, in Haiti, the percentage of female factory workers among the workforce lies between 65- 70%.

Table 3: List of factories in the Haitian garment sector registered with Better Work as of September 2015

	Name of factory	Status
1.	Caribbean Island Apparel S.A.	Registered in 2009
2.	CODEVI	Registered in 2009
3.	DKDR HAITI S.A.	Registered in 2009

⁸ « Le Bulletin d'informations de l'Association des Industries d'Haïti », Volume 2, Number 9, September 2015.

4.	Fairway Apparel S.A.	Registered in 2010
5.	Fox River Caribe, INC	Registered in 2009
6.	Genesis S.A.	Registered in 2009 (currently out of operations)
7.	Gladiator Textiles LLC	Registered in 2012 (currently out of operations)
8.	Global Manufacturers & Contractors S.A.	Registered in 2010
9.	Goal Export S.A.	Registered in 2015
10.	H&H Textiles S.A.	Registered in 2014
11.	Horizon Manufacturing S.A.	Registered in 2010
12.	Indigo Mountain Haiti S.A.	Registered in 2012
13.	Industrial Revolution II S.A.	Registered in 2014 (currently out of operations)
14.	Interamerican Wovens S.A.	Registered in 2009
15.	Johan Company	Registered in 2009 (currently out of operations)
16.	Life S.A.	Registered in 2015
17.	Modas BU IL Haiti S.A.	Registered in 2013
18.	MGA Haiti S.A	Registered in 2009
19.	Multiwear S.A.	Registered in 2009
20.	Isis Apparel S.A. (former One World Apparel)	Registered in 2009
21.	Pacific Sports Haiti S.A.	Registered in 2009
22.	Palm Apparel S.A.	Registered in 2009
23.	Premium Apparel S.A.	Registered in 2009
24.	Quality Sewing MFG. S.A.	Registered in 2009
25.	Sewing International S.A.	Registered in 2009
26.	Seed Apparel S.A.	Registered in 2015 (currently out of operations)
27.	S&H Global S.A.	Registered in 2014
28.	Textiles Youm Kwang S.A.	Registered in 2012
29.	The Willbes Haitian II S.A.	Registered in 2015
30.	The Willbes Haitian III S.A.	Registered in 2010
31.	The Little Haitian Factory S.A.	Registered in 2010 (currently out of operations)
32.	Val D'Or Apparel MFG Haiti S.A.	Registered in 2014

5.2. Findings from the factories

This section reports on efforts made by the factories to address their non-compliance findings as outlined in the previous HOPE II biannual reports (October 2010, April 2011, October 2011, April 2012, October 2012, April 2013, October 2013, April 2014, October 2014, April 2015). The factory tables presented in this section provide detailed information derived from each factory's assessments and advisory services.

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

- compliance needs by compliance cluster and by compliance point: black dots (●) represent non-compliance identified in the baseline assessment and non-compliance that has not yet been addressed by the factory in its improvement plan. Half-black dots (◐) represent areas where factories have made several improvements but are still in non-compliance since each compliance point is composed of several questions;
- details on the non-compliance identified by EAs: the information included in this column constitutes the issues where evidence of non-compliance was found in the last assessment conducted by Better Work at each particular factory (the date of the last assessment is equally stated 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.

Note: Better Work is not reporting on compliance with the production wage, but is indicating the percentage of piece rate workers being paid 300 or 320 (as of May 2015) Gourdes or more during ordinary hours of work in the chart below each individual factory table. These percentages can vary over the cycles as they depend on a number of factors, such as the geographical location which can cause challenges to find skilled workforce (e.g. in the newly developed industrial area in the North where no garment industry existed before), fluctuation of orders and production cycles.

Factory Tables

Caribbean Island Apparel S.A.

Location: Port-au-Prince
 Number of workers: 2220
 Date of registration: 9-Sep-09
 Date of last BW assessment: 13-Jan-15

- Factory was found non-compliant.
- ◐ Factory was progressing
- No-evidence of non-compliance.

Advisory and Training Services

Date	Activity
16-Jan-15	Meeting with management on non compliances related to compensation. Factory tour for the two new buildings.
19-Feb-15	Meeting with management on PICC operations and emergency preparedness issues.
29-Apr-15	Participation in an industry seminar on Better Work's revised service delivery model
19-May-15	Meeting with management on the Self Diagnosis tool and the Better Work adjusted model.
30-May-15	PICC Meeting.
13-Jul-15	Meeting with management regarding Self diagnosis tool, the BW portal and the public compliance assessment tool.
	Discussions about upcoming BW trainings and factory training needs.
	Follow up on issues discussed during past PICC meetings.
18-Sep-15	Meeting with compliance manager regarding PICC meeting and pending compliance issues at the factory.
22-Sep-15	PICC Meeting

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
Child Labour	Child Labourers	○	○	○	○	○	○	○	○	○	○				
	Documentation and Protection of Young Workers	○	○	○	○	○	○	○	○	○	○				
	Hazardous Work	○	○	○	○	○	○	○	○	○	○				
	Unconditional Worst Forms	○	○	○	○	○	○	○	○	○	○				
Discrimination	Gender	○	○	○	○	○	○	○	○	○	○				
	Race and Origin	○	○	○	○	○	○	○	○	○	○				
	Religion and Political Opinion	○	○	○	○	○	○	○	○	○	○				
Forced Labour	Bonded Labour	○	○	○	○	○	○	○	○	○	○				
	Coercion	●	○	○	○	○	○	○	○	○	○				
	Forced Labour and Overtime	○	○	○	○	○	○	○	○	○	○				
	Prison Labour	○	○	○	○	○	○	○	○	○	○				
Freedom of Association and Collective Bargaining	Collective Bargaining	○	○	○	○	○	○	○	○	○	○				
	Interference and Discrimination	○	○	○	○	○	○	○	○	○	○				
	Strikes	○	○	○	○	○	○	○	○	○	○				
	Union Operations	○	○	○	○	○	○	○	○	○	○				
	Method of Payment	○	○	○	○	○	○	○	○	○	○				
	Minimum Wage	○	○	○	○	○	○	○	○	○	○				
	Overtime Wages	●	○	○	○	○	○	○	○	○	○				

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
	Working Environment	●	○	●	◐	●	◐	◐	◐	●	◐	Workplace lighting.	Ensure that workplace lighting is at the minimum required level.	Workplace temperature is acceptable as it is maintained below 30 C. Installation of new lights in the sewing sections is in progress.	42
	Worker Protection	●	○	●	◐	●	●	◐	○	●	●	Installing guards on all dangerous moving parts of machines and equipment.	Install guards on dangerous moving parts of machines.	A system has been put in place with the mechanics to ensure that all machines have the proper guards	6
Working Time	Leave	○	○	●	○	○	○	○	○	○	○				
	Overtime	●	◐	○	○	●	○	○	○	●	○				
	Regular Hours	●	◐	◐	○	○	○	○	○	○	○				

Percentage of piece rate workers earning 300 (320 Gourdes as of May 2015) or more for eight hours of work (workers' average earnings):

Oct-13	Apr-14	Oct-14	Apr-15
47%	34%	60%	60%

Location:	Ouanaminthe
Number of workers:	7500
Date of registration:	24-Sep-09
Date of last BW assessment:	10-Feb-15

- Factory was found non-compliant
- ◐ Factory was progressing
- No-evidence of non-compliance

Date	Activity
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5-May-15	Meeting with the health and safety officer to discuss the remediation of the OSH issues in the factory. Factory tour with the health and safety officer.
5-May-15	PICC Training for workers. PICC Training for Managers.
6-May-15	Meeting with the compliance manager to review the improvement plan and introduce the new service delivery model of Better Work.
7-May-15	Participation in an industry seminar on Better Work's revised service delivery model
7-May-15	Workplace Communication Training.
8-May-15	Meeting with management and union representatives to discuss on the ongoing strike at FW1.
8-May-15	Maternity Protection Training
9-May-15	Supervisory skills training
11-May-15	Workplace Communication Training.
11-May-15	Financial Literacy Training.
30-Jun-15	Meeting with the compliance team to discuss the implementation of the improvement plan and of the bipartite committee.
30-Jun-15	Meeting with the union representatives to follow up on the last strike (May 2015).
30-Jul-15	Workplace Communication Training.
31-Jul-15	Workplace Communication Training.
13-Aug-15	Meeting with the compliance team to follow up on the self diagnosis process and termination of unionist in relation to strike, Implementation of the bipartite
13-Aug-15	Meeting with the union representatives to discuss the possibility of the implementation of a bipartite committee.

[illegible]

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
Freedom of Association and Collective Bargaining	Collective Bargaining	○	●	●	●	●	◐	●	●	●	●	Implementation of collective agreement.	Correctly apply the collective bargaining agreement.		48
	Interference and Discrimination	○	○	○	○	○	○	○	○	○	○				
	Strikes	○	○	○	○	○	○	○	○	○	○				
	Union Operations	○	○	○	○	○	○	○	○	○	○				
	Method of Payment	○	○	○	○	○	○	○	○	○	○				
	Minimum Wage	●	◐	◐	●	●	●	○	○	○	○				
Compensation												Payment for overtime worked at night.	Overtime hours completed at night must be paid 100% above the normal wage.		6
	Overtime Wages	●	○	●	●	○	○	○	○	●	◐	Payment for overtime hours worked weekly rest day.	Overtime hours worked on weekly rest day must be paid 100% above the normal wage.		
														Ordinary overtime is correctly paid.	
	Paid Leave	●	○	●	●	●	●	●	●	●	●	Payment for weekly rest days.	Pay weekly rest day to all workers entitled to it.		42
	Premium Pay	○	○	○	●	○	○	●	●	◐	○			Payment for regular working hours worked on holidays was done according to the law.	
												Employer contribution to OFATMA for work-related accident insurance.	Pay employer contribution to OFATMA for work-related accident insurance.		36
	Social Security and Other Benefits	○	●	○	●	●	●	●	●	●	◐			The employer paid employer contributions to ONA on time.	
														The employer forward workers' contributions for social insurance funds to ONA on time.	
	Wage Information, Use and Deduction	●	●	○	○	●	●	○	○	○	○				
	Contracting Procedures	○	○	○	○	○	○	○	○	○	○				
	Dialogue, Discipline and Disputes	○	○	○	○	○	○	●	●	○	○				
	Employment Contracts	○	●	○	○	○	○	○	○	○	○				

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
Contracts and Human Resources	Termination													Reasons for termination are clearly mentioned in workers' files and compliant with legal requirements.	
														Workers are given an opportunity to defend themselves before disciplinary measures are applied.	
														Ministry of Labor is notified when suspending operations due to lack of materials, force majeure, or accident resulting in an immediate work stoppage.	

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
Chemicals and Hazardous Substances												Washing facilities or cleansing materials in the event of chemical exposure.	Install eye wash stations in all areas where chemicals are stored or in use.		54
												Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Provide MSDS for all chemicals and hazardous substances used in the workplace.		
												Storage of chemicals and hazardous substances.	Ensure that storage of chemicals and hazardous substances is adequate.		
														The factory keeps an accurate inventory of all chemicals and hazardous substances used in the workplace.	
														All containers of chemicals and hazardous substances used in the workplace are labeled.	

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
Occupational Safety and Health	Emergency Preparedness											Firefighting equipment.	Install and maintain proper fire-fighting equipment and ensure they are readily accessible at all time	The factory conducts regular checks to ensure that the fiire fighting equipement is functioning and not obstructed.	36
												.		The factory posted and marked emergency exits and escape routes in the workplace.	
														The factory ensured that all escape routes and exits remain unobstructed and open, unlocked at all time during working hours.	
														The factory installed smoke detectors in all buildings.	
Occupational Safety and Health	Health Services and First Aid											Onsite medical facilities and staff.	Provide the number of nurses inside the workplace as per labour law.		54
												First aid boxes/supplies in the workplace.	Keep first aid boxes readily accessible.	The factory trained additional staff in first aid and assigned new person in charge of first aid boxes.	
												Pre-assignment and/or annual medical checks for workers.	Provide pre-assignment and annual medical checks for workers.	The employer provided pre-assignment and annual medical checks for about 30% of workers.	
	OSH Management Systems											Recording work-related accidents and diseases and/or submitting the record to OFATMA.	Submit all work-related accidents and diseases to OFATMA.		48

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
												Toilets.	Provide the amount of toilets required by the Haitian Labour Code.		54
	Welfare Facilities	●	◐	◐	◐	●	●	◐	●	◐	◐	Eating area.	Provide seats for all the workers during lunch time.		
														The factory provides washing facilities and soap.	
	Worker Accommodation	○	○	○	○	○	○	○	○	○	○			The temperature level in the workplace is acceptable.	
	Working Environment	○	○	●	◐	●	◐	●	●	●	○			The noise levels in the workplace is acceptable.	
														The light level in the workplace is acceptable	

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
Worker Protection		● ● ● ● ● ● ● ● ● ●										Providing workers with personal protective clothing and equipment.	Provide workers with personal protective clothing and equipment.		54
												Chairs with backrests.	Provide workers with chairs with backrest.	The factory repaired or replaced about 70% of the chairs without backrest.	
												Installing guards on all dangerous moving parts of machines and equipment.	Install and maintain proper guards on all dangerous moving parts of machines.		
												Accommodating standing workers.	Ensure that standing workers are properly accommodated.		
												Training of workers to use machines and equipment safely.	Train workers to use machines and equipment safely.		
Working Time	Leave	○ ○ ○ ○ ● ● ○ ● ○ ●										Time off for annual leave.	Provide time off for annual leave according to the law.		42
	Overtime	● ○ ● ● ● ● ● ● ● ●										Limits on overtime hours worked.	Comply with limits on overtime hours worked.		
												Authorization from the Department of Labour for overtime.	Obtain authorization from the Department of Labour for overtime.		
	Regular Hours	● ● ● ● ● ● ● ○ ○ ○													

Percentage of piece rate workers earning 300 (320 as of May 2015) Gourdes or more for eight hours of work (workers' average earnings as an unweighted average for all buildings):

Oct-13	Apr-14	Oct-14	Apr-15
51%	37%	44%	44%

DKDR Haiti S.A.

Location: Port-au-Prince
Number of workers: 1529
Date of registration: 9-Oct-09
Date of last BW assessment: 7-Oct-14

- Factory was found non-compliant
- ◐ Factory was progressing
- No-evidence of non-compliance

Advisory and Training Services

Date	Activity
04-Feb-15	Advisory meeting with Plant Manager, Finance Manager and HR manager on legal and administratives procedures for reduction of workforce due to changes in operations.
03-Mar-15	Meeting with the management team to present the improvement plan, discuss about the needs of the HR department and workplace incident and investigation.
17-Apr-15	Meeting with management to discuss the status of operations at DKDR, follow-up on the improvement plan, PICC Finalization, introduction to new compliance manager
21 to 23 -Apr-15	Supervisory Skills Training.
25-Apr-15	PICC Training
28-Apr-15	PICC meeting
29-Apr-15	Participation in an industry seminar on Better Work's revised service delivery model
27-May-15	PICC meeting
01-Jun-15	Advisory meeting with the plant director to discuss capacity building needs for HR department, rehiring of terminated production manager, training plan for supervisors and PICC members
16 to 18 -Jun-15	Supervisory Skills Training.
23 to 25 -Jun-15	Supervisory Skills Training.
25-Jun-15	Advisory meeting with the new compliance manager in order to introduce him to the self diagnosis tool.
26-Jun-15	PICC Meeting
7 & 8 Juillet	Negotiation
15 to 17 -Jul-15	Supervisory Skills Training.
21 et 22 Juillet	Negotiation
30-Jul-15	Advisory visit to discuss the new piece rate system with the factory director, production manager, union representatives and the labor ombudsperson.
30-Jul-15	PICC Meeting
31-Aug-15	PICC Meeting
9-12 Sept. 15	Workers Rights & Responsibilities
17-Sep-15	PICC Meeting

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Child Labour	Child Labourers	○	○	○	○	○	○	○	○	○	○	○				
	Documentation and Protection of Young Workers	○	○	○	○	○	○	○	○	○	●	○			The factory ensures that all workers have the required identification documents.	

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
	Hazardous Work	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Unconditional Worst Forms	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Gender	☒	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐				
Discrimination	Race and Origin	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Religion and Political Opinion	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Bonded Labour	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
Forced Labour	Coercion	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Forced Labour and Overtime	☐	☐	☐	☒	☐	☒	☐	☐	☐	☐	☐				
	Prison Labour	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Collective Bargaining	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
Freedom of Association and Collective Bargaining	Interference and Discrimination	☐	☐	☐	☐	☐	☐	☐	☒	☒	☐	☐				
	Strikes	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Union Operations	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Method of Payment	☐	☐	☐	☐	☐	☒	☐	☐	☐	☐	☐	Wage payment directly to workers at the workplace on working days.	Ensure that wages are paid to workers on working days.	Payroll is done on working days.	
	Minimum Wages	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☒	Payment of minimum wage for full time workers.	Ensure that all security guards employed by the factory earn minimum wage for ordinary hours of work.		
	Overtime Wages	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☒	Payment for ordinary overtime. Payment for overtime worked at night.	Ensure that all security guards receive adequate payment for ordinary overtime. Ensure that all security guards receive adequate payment for overtime worked at night.		
	Paid Leave	☒	☐	☐	☐	☒	☐	☐	☒	☒	☐	☐	Payment for annual leave. Payment for sick leave. Payment for maternity leave.	Ensure that payment for annual leave is accurate. Ensure that payment for sick leave is accurate. Ensure that payment for maternity leave is accurate.	The factory hired a senior accountant in order to ensure that wages and other related payments are done correctly.	
	Premium Pay	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Compensation													Employer contribution to OFATMA for work related accident insurance.	Pay the employer contribution to OFATMA for work related accident insurance.	The factory made a partial payment to OFATMA for work related accident insurance.	
													Employer contribution to OFATMA for maternity and health insurance.	Register with OFATMA for maternity and health insurance.		
													Forwarding of workers' contributions to OFATMA.	Forward of workers' contributions to OFATMA after registration.		
	Social Security and Other Benefits	●	●	●	○	●	●	●	●	○	○	●	Employer contribution to ONA.	Pay employer contribution to ONA on time.	The factory paid 4 months of employer contribution to ONA.	36
													Collecting and forwarding of workers' contributions for social insurance funds to ONA.	Forward workers' contributions for social insurance funds to ONA on time.	The factory forwarded 4 months of workers contribution to ONA for social insurance funds.	
													Payment of annual salary supplement or bonus.	Pay the annual salary supplement or bonus.	The factory hired a senior accountant in order to ensure that wages and other related payments are done correctly.	
	Wage Information, Use and Deduction	●	○	○	○	○	●	○	●	○	●	○	Payroll records.	Keep one accurate payroll record.	The factory hired a senior accountant in order to ensure that wages and other related payments are properly recorded.	6
	Contracting Procedures	○	○	○	○	○	○	○	○	○	○	○				

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Contracts and Human Resources	Dialogue, Discipline and Disputes												Bullying, harassment or humiliating treatment of workers.	Ensure that workers are not bullied, harassed or humiliated.	The factory registered additional supervisors to the supervisory skills training organized by Better Work. Communication skills training will also be provided.	36
															Disciplinary measures comply with the legal requirements.	
	Employment Contracts														All persons performing work for the factory have a contract.	
													Notice of termination.	Provide appropriate notice of termination to workers.		
													Reduction in workforce size or suspensions due to change in operations.	Send adequate notice to MAST when reducing workforce or suspending workers due to changes in operations.		
	Termination														Reasons for termination comply with the legal requirements.	12
															Workers are offered opportunity to defend themselves before termination based on conduct or performance.	

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Chemicals and Hazardous Substances													Labelling of chemicals and hazardous substances.	Label all chemicals and hazardous substances.		
													Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Post chemical safety data sheets for all chemicals and hazardous substances used in the workplace.		
													Assessing, monitoring, preventing and/or limiting workers' exposure to hazardous substances.	Assess, monitor, prevent and/or limit workers' exposure to hazardous substances.		
Emergency Preparedness													Firefighting equipment.	Ensure that firefighting equipment is available and properly maintained at all time.		
													Training workers to use the firefighting equipment.	Train 10% of workforce to use the firefighting equipment.		
													Accessible, unobstructed, and/or unlocked emergency exits during working hours, including overtime.	Ensure that all emergency exits are kept accessible, unobstructed, and/or unlocked during working hours, including overtime.		
													Storage of flammable materials.	Ensure that all flammable materials are properly stored.		
													Safeguarding possible sources of ignition.	Safeguard all possible sources of ignition.		

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Occupational Safety and Health	Health Services and First Aid												Health checks for workers who are exposed to work-related hazards.	Provide onsite medical facilities and staff as required by law.	The factory hired a doctor who provide health checks to workers on a regular basis.	60
		●	●	●	●	●	●	●	●	●	●	●	Safety and health risks to pregnant or nursing workers.	Provide pre-assignment and/or annual medical checks for workers.		
													First aid boxes/supplies in the workplace.	Train 10% of the workforce on first aid as recommended by Better Work.		
													First-aid training for workers.			
	OSH Management Systems	●	●	●	●	○	○	○	○	○	○	○			The factory perform regular assessment of general occupational safety and health issues in the factory.	
													Providing drinking water.	Provide drinking water.		
Welfare Facilities													Toilets.	Increase the number of toilets and repair the ones that are malfunctioning.		60
		●	●	●	●	●	●	●	●	●	●	●	Eating area.	Provide an adequate eating area.		
	Worker Accommodation														The workplace is kept clean and tidy.	
															The factory provides adequate washing facilities and/or soap.	

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Working Environment													Workplace temperature.	Reduce the workplace temperature.		48
													Workplace lighting.	Increase the workplace lighting.		
													Providing workers with personal protective clothing and equipment.	Provide workers with personal protective clothing and equipment.		
													Training and encouragement of workers to use the personal protective equipment provided.	Train and encourage workers to use the personal protective equipment provided.		
													Ergonomic requirements	Accommodate standing workers properly.		
Worker Protection													Installing, grounding, and/or maintaining electrical wires, switches, and/or plugs.	Provide all workers with chairs with backrests.		60
													Installing guards on all dangerous moving parts of machines and equipment.	Ensure that all electrical wires, switches, and/or plugs are correctly installed, grounded, and/or maintained.		
													Punishment of workers who removed themselves from work situations they believed presented an imminent and serious danger to life or health.	Punishment of workers who removed themselves from work situations they believed presented an imminent and serious danger to life or health.		

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Working Time	Leave	●	○	●	●	●	○	○	○	●	●	○			The factory provides time off for breastfeeding breaks to all eligible workers. The factory provides time off for annual leave to all eligible workers.	
	Overtime	●	●	◐	●	●	◐	●	○	●	◐	○			The factory requested authorization from the Department of Labour for overtime. The factory requested authorization from the Department of Labour for work on Sundays.	
	Regular Hours	●	●	●	○	●	○	●	○	○	○	●	Working time records	Keep working time records that reflect the hours actually worked		

Percentage of piece rate workers earning 300 (320 Gourdes as of May 2015) or more for eight hours of work (workers' average earnings):

Oct-13	Apr-14	Oct-14	Apr-15	Oct-15
11%	9%	11%	39%	11%

Fairway Apparel S.A.

Location: Port-au-Prince
 Number of workers: 455
 Date of registration: 22-Oct-10
 Date of last BW assessment: 9-Jun-15

- Factory was found non-compliant.
- ◐ Factory was progressing
- No evidence of non-compliance.

Advisory and Training Services

Date	Activity
19-Feb-15	Meeting with compliance/HR officer and factory owner to discuss establishment of PICC, resolution of conflicts and follow up on improvements.
10-Mar-15	Discussion with Union representatives and workers about PICC and election of representatives.
22-Mar-15	Meeting with union leaders and general manager to discuss ongoing conflicts at the workplace.
9-Apr-15	Follow up on the process of registration of PICC members with Union leaders.
15-Apr-15	Continuing of registration process for the PICC
23-Apr-15	Training: PICC for worker's representatives.
28-Apr-15	Training: PICC for Management representatives. Discussion with factory owner on roles and responsibilities of the PICC representatives and it's mandate.
29-Apr-15	Participation in an industry seminar on Better Work's revised service delivery model
30-Apr-15	PICC meeting: Presentation of members and discussion about expectations from the PICC.
22-May-15	PICC Meeting: Discussion on the participation of the PICC on the self diagnosis process
12-Jul-15	Training: Negotiation skills
14-Jul-15	Meeting with HR/Compliance manager to discuss important findings on the last assessment, progress and PICC involvement on self diagnosis process.
21-Jul-15	Training: Negotiation skills

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
Child Labour	Child Labourers	○	○	○	○	○	○	○	○	○	○				
	Documentation and Protection of Young Workers	○	○	○	○	○	○	○	○	○	○				
	Hazardous Work	○	○	○	○	○	○	○	○	○	○				
	Unconditional Worst Forms	○	○	○	○	○	○	○	○	○	○				
Discrimination	Gender	●	○	○	○	○	○	○	○	○	○				
	Race and Origin	○	○	○	○	○	○	○	○	○	○				
	Religion and Political Opinion	○	○	○	○	○	○	○	○	○	○				
Forced Labour	Bonded Labour	○	○	○	○	○	○	○	○	○	○				
	Coercion	○	○	○	○	○	○	○	○	○	○				
	Forced Labour and Overtime	○	○	●	○	○	○	○	○	○	○				

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Months
		1	2	3	4	5	6	7	8	9	10			
Freedom of Association and Collective Bargaining	Prison Labour	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐			
	Collective Bargaining	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐			
	Interference and Discrimination	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐			
	Strikes	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐			
	Union Operations	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐			
	Method of Payment	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐			
	Minimum Wage	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐			
	Overtime Wages	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐			
	Paid Leave	☒	☐	☒	☐	☐	☐	☐	☒	☐	☐			
	Premium Pay	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐			
Compensation												Employer contribution to ONA.	Regularize back payment for employer's contribution and make ongoing monthly payment to ONA on time.	42
												Collecting and forwarding workers' contributions for social insurance funds to ONA.	Regularize back payment for worker's contribution and make ongoing monthly payment to ONA on time.	
	Social Security and Other Benefits	☒	☐	☒	☐	☒	☐	☒	☐	☒	☒	Employer contribution to OFATMA for maternity and health insurance.	Register all workers to OFATMA for maternity and health insurance and make necessary contribution.	
												Forwarding of workers' contributions to OFATMA.	Collect and forward workers contribution for maternity and health insurance to OFATMA	
	Wage Information, Use and Deduction	☒	☐	☐	☐	☐	☐	☐	☒	☐	☒	Payroll records.	Properly and accurately record all working time and wages in the main payroll reporting.	
Contracts and Human	Contracting Procedures	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐			
	Dialogue, Discipline and Disputes	☐	☐	☒	☐	☐	☐	☒	☒	☒	☐			The factory took action to eliminate bullying or verbal abuse in the factory.
	Employment Contracts	☒	☐	☒	☒	☐	☐	☐	☐	☐	☒	Employment contracts' compliance with the labour code, collective agreement and/or internal work rules.	The factory must revise the internal work rules to align with employment contracts and actual working schedule.	

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Months
		1	2	3	4	5	6	7	8	9	10			
Resources												Payment for unused paid annual leave upon resignation or termination.	Ensure all terminated workers are properly compensated for unused annual leave regardless of employment period.	
	Termination	●	○	●	●	●	○	○	○	○	●	Annual salary supplement or bonus upon termination.	Ensure all terminated workers are properly paid annual bonus regardless of employment period.	
	Chemicals and Hazardous Substances	●	●	○	○	●	○	○	○	○	○			
												Firefighting equipment. Marking or posting of emergency exits and/or escape routes in the workplace.	Ensure firefighting equipment remains unblocked and accessible at all time.	
	Emergency Preparedness	○	●	●	●	●	○	○	○	○	●	Accessible, unobstructed, and/or unlocked emergency exits during working hours, including overtime.	Keep an updated and visible evacuation plan in all floors.	
	Health Services and First Aid	●	●	○	●	○	○	○	○	●	○			
	OSH Management Systems	●	●	●	●	○	○	○	○	○	○			
												Toilets.	Provide the quantity of toilets required by the Haitian Labour code.	54
	Welfare Facilities	●	●	●	●	○	●	●	●	●	●	Eating area.	Improve the conditions of the eating area to properly accommodate the workers.	
	Worker Accommodation	○	○	○	○	○	○	○	○	○	○			

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Months
		1	2	3	4	5	6	7	8	9	10			
Occupational Safety and Health	Working Environment											Workplace lighting.	Increase the lighting levels in the workplace.	36
												Workplace temperature and/or ventilation.	Take appropriate measures to reduce the temperature in the workplace.	
		○ ● ○ ● ● ● ● ● ● ●										Workplace lighting.	Take appropriate measures to improve light levels in the workplace.	
												Workplace cleanliness	Ensure the workplace remains clean during working hours.	
	Worker Protection											Installing guards on all dangerous moving parts of machines and equipment.	Install guards on all dangerous moving parts of machines and equipment.	18
● ● ● ● ● ○ ● ● ● ●										Ergonomic requirements	Provide chairs with back rest to all workers.			
										Posting safety warnings in the workplace.	Ensure warning signs are posted on electric boxes and dangerous equipment throughout the factory.			
Working Time	Leave	○ ○ ● ● ● ○ ○ ○ ○ ○										Workers are adequately equipped for heavy lifting.		
	Overtime	● ● ● ○ ● ○ ○ ○ ○ ● ○										No workers were found to have exceeded limit of 80 hours of overtime per trimester for the reviewed period.		
	Regular Hours											Working time records.	Accurately record all working time in the main attendance for proper reporting.	
		● ● ● ● ● ○ ○ ○ ○ ●												

Percentage of piece rate workers earning 300 (320 Gourdes as of May 2015) or more for eight hours of work (workers' average earnings):

Oct-13	Apr-14	Oct-14	Apr-15	Oct-15
11%	0%	6.50%	40%	26%

Fox River

Location: Port-au-Prince
 Number of workers: 51
 Date of registration: 29-Sep-09
 Date of last BW assessment: 21-Oct-14

- Factory was found non-compliant
- ◐ Factory was progressing
- No-evidence of non-compliance

Advisory and Training Services

Date	Activity
04-Mar-15	Meeting with factory general manager to discuss the improvement plan and priorities. Factory tour with assistant manager to identify the improvements to be done on OSH.
29-Apr-15	Participation in an industry seminar on Better Work's revised service delivery model
30-Apr-15	Meeting with factory general manager to introduce the revised Better Work service delivery model and the factory's approach and action plan for the roll out to the new model.
15-May-15	Meeting with factory general and assistant manager to introduce the revised Better Work model. Discussion to establish a bi-partite committee at the factory and training.
20-May-15	PICC training for workers and management representatives.
19-Jun-15	Meeting with General Manager for the planning of the first PICC meeting.
02-Jul-15	PICC Meeting.
30-Jul-15	PICC Meeting.
03-Sep-15	PICC Meeting.

Compliance cluster	Compliance point	Assessment								Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8				
Child Labour	Child Labourers	○	○	○	○	○	○	○	○				
	Documentation and Protection of Young Workers	○	○	○	○	○	○	○	○				
	Hazardous Work	○	○	○	○	○	○	○	○				
	Unconditional Worst Forms	○	○	○	○	○	○	○	○				
Discrimination	Gender	○	○	○	○	○	○	○	○				
	Race and Origin	○	○	○	○	○	○	○	○				
	Religion and Political Opinion	○	○	○	○	○	○	○	○				
Forced Labour	Bonded Labour	○	○	○	○	○	○	○	○				
	Coercion	○	○	○	○	○	○	○	○				
	Forced Labour and Overtime	○	○	○	○	○	○	○	○				
	Prison Labour	○	○	○	○	○	○	○	○				
	Collective Bargaining	○	○	○	○	○	○	○	○				

Compliance cluster	Compliance point	Assessment								Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8				
Freedom of Association and Collective Bargaining	Interference and Discrimination	☐	☐	☐	☐	☐	☐	☐	☐				
	Strikes	☐	☐	☐	☐	☐	☐	☐	☐				
	Union Operations	☐	☐	☐	☐	☐	☐	☐	☐				
Compensation	Method of Payment	☐	☐	☐	☐	☐	☐	☐	☐				
	Minimum Wage	☐	☐	☐	☐	☐	☐	☐	☐				
	Overtime Wages	☐	☐	☐	☐	☐	☐	☐	☐				
	Paid Leave	☒	☐	☐	☒	☐	☐	☐	☐				
	Premium Pay	☐	☐	☐	☐	☐	☐	☐	☐				
	Social Security and Other Benefits	☒	☒	☐	☐	☐	☒	☐	☐				
	Wage Information, Use and Deduction	☒	☐	☐	☐	☐	☐	☐	☐				
Contracts and Human Resources	Contracting Procedures	☐	☐	☐	☐	☐	☐	☐	☐				
	Dialogue, Discipline and Disputes	☐	☐	☐	☐	☐	☐	☐	☐				
	Employment Contracts	☒	☒	☐	☐	☐	☐	☐	☐				
	Termination	☒	☐	☐	☒	☐	☐	☒	☐				
										Chemical safety data sheets for all chemicals and hazardous substances in the workplace	Provide chemical safety data sheets for all chemicals and hazardous substances used in the workplace.		6
	Chemicals and Hazardous Substances	☒	☐	☐	☐	☐	☐	☒	☐	Washing facilities or cleansing materials in the event of chemical exposure.	Provide eye washing stations near chemical storage places in the event of chemical exposure.		
	Emergency Preparedness	☒	☐	☒	☐	☐	☐	☒	☒	Marking or posting of emergency exits and/or escape routes in the workplace.	Ensure that exits are marked and posted in the workplace.	The factory has posted signs in the workplace to indicate exits.	6
	Health Services and First Aid	☒	☐	☐	☐	☐	☒	☒	☐	Onsite medical facilities and staff.	Ensure that the factory is compliant with the number of nurses and doctor visits required as per the law.		42

Compliance cluster	Compliance point	Assessment								Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8				
Occupational Safety and Health	OSH Management Systems	●	◐	◐	◐	○	◐	●	●	Written OSH policy.	The factory needs to have a written OSH policy that describes the responsibility of the management and workers on OSH issues.		12
										Assessment of general occupational safety and health issues in the factory	Regularly conduct an OSH assessment in the factory.		
	Welfare Facilities	●	◐	○	○	○	○	●	●	Washing facilities and/or soap.	The factory must ensure availability of soap at all time in the workplace during working hours.	The factory has taken actions to ensure that soap is available in the washing facilities at all time.	6
	Worker Accommodation	○	○	○	○	○	○	○	○				
	Working Environment	●	○	○	●	○	○	○	○				
	Worker Protection	●	◐	●	●	◐	●	●	◐	Providing workers with personal protective clothing and equipment.	Ensure availability of goggles in the mechanics' shop and provide all workers in the sewing section with dust masks.	The factory has performed maintenance to improve electrical equipment's and installations.	42
Working Time	Leave	○	○	◐	●	○	●	○	○				
	Overtime	○	●	○	○	○	○	○	○				
	Regular Hours	●	●	●	◐	◐	○	○	●	Working time records.	Keep adequate working time records.		

Percentage of piece rate workers earning 300 (320 Gourdes as of May 2015) or more for eight hours of work (workers' average earnings):

Apr-15
54%

Global Manufacturers & Contractors S.A.

Location: Port-au-Prince
Number of workers: 1852
Date of registration: 19-Sep-10
Date of last BW assessment: 28-Oct-14

- Factory was found non-compliant
- ◐ Factory was progressing
- No-evidence of non-compliance

Advisory and Training Services

Date	Activity
4 to 6-Mar-15	Supervisory skill training
5-Mar-15	Meeting with the compliance manager to discuss the improvement plan and review of new contract for workers.
29-May-15	Meeting with the new compliance manager to introduce the new better work services delivery model, the self diagnosis process and the establishment of a bipartite committee.
20-Apr-15	Meeting with mediator, MAST, Factory management on issues that led to a strike.
25-Jun-15	Meeting with the compliance staff and the OSH Committee in order to introduce the self diagnosis process.
11-Aug-15	Meeting with the general manager and the compliance manager to discuss : reduction of workforce due to lack of orders, implementation of the bipartite committee, self diagnosis report, follow up on the improvement plan, night Overtime and related payment issue.
10-Sep-15	OSH committee meeting.

Compliance cluster	Compliance point	Assessment									Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9				
Child Labour	Child Labourers	○	○	○	○	○	○	○	○	○				
	Documentation and Protection of Young Workers	○	○	○	○	○	○	○	○	○				
	Hazardous Work	○	○	○	○	○	○	○	○	○				
	Unconditional Worst Forms	○	○	○	○	○	○	○	○	○				
Discrimination	Gender	○	○	○	○	○	○	○	○	○				
	Race and Origin	○	○	○	○	○	○	○	○	○				
	Religion and Political Opinion	●	○	○	○	○	○	○	○	○				
Forced Labour	Bonded Labour	○	○	○	○	○	○	○	○	○				
	Coercion	○	○	○	○	○	○	○	○	○				
	Forced Labour and Overtime	○	○	○	○	○	○	○	○	○				
	Prison Labour	○	○	○	○	○	○	○	○	○				
Freedom of Association and Collective Bargaining	Collective Bargaining	○	○	○	○	○	○	○	○	○				
	Interference and Discrimination	○	○	○	○	○	○	○	○	○				
	Strikes	○	○	○	○	○	○	○	○	○				
	Union Operations	○	○	○	○	○	○	○	○	○				
	Method of Payment	○	○	○	○	○	○	○	○	○				
	Minimum Wage	○	○	○	○	○	○	○	○	●			The factory pays the minimum wage to all full time workers.	
	Overtime Wages	○	○	○	○	○	○	○	○	○	●	Payment for overtime worked at night. Pay overtime hours worked at night correctly.		

Compliance cluster	Compliance point	Assessment									Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9				
Compensation	Paid Leave	☐	☐	☐	☐	☒	☐	☒	☐	☒	Payment for annual leave.	Pay correctly for annual leave.		
	Premium Pay	☐	☐	☐	☐	☐	☐	☐	☐	☐				
											Payment of annual salary supplement or bonus.	Pay of annual salary supplement or bonus.		6
	Social Security and Other Benefits	☒	☒	☒	☐	☒	☒	☐	☒	☐			The employer pays its contribution to ONA on time.	
													The employer forward workers' contributions for social insurance funds to ONA on time.	
Contracts and Human Resources	Wage Information, Use and Deduction	☒	☐	☐	☐	☐	☐	☐	☐	☒	Payroll records.	Keep one accurate payroll records.		
	Contracting Procedures	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Dialogue, Discipline and Disputes	☐	☐	☐	☐	☐	☒	☐	☐	☐				
	Employment Contracts	☒	☒	☐	☐	☐	☐	☐	☐	☐				
	Termination	☒	☐	☐	☐	☐	☐	☐	☐	☐				
	Chemicals and Hazardous Substances	☒	☒	☐	☒	☐	☒	☐	☐	☐			All secondary containers of chemicals are labeled.	
											Accessible, unobstructed, and/or unlocked emergency exits during working hours, including overtime.	Ensure that exits are accessible and unlocked at all times.	Emergency exits are accessible, unobstructed, and/or unlocked during working hours, including overtime.	48
											Firefighting equipment.	Ensure that the workplace has adequate firefighting equipment.		
	Emergency Preparedness	☒	☒	☐	☐	☐	☐	☐	☐	☒	Marking or posting of emergency exits and/or escape routes in the workplace.	Ensure that emergency exits and escape route are marked and posted in the workplace.	Emergency routes were repainted in June 2015.	
											Fire detection and alarm system.	Install adequate fire detection and alarm system.	Fire detection and alarm system was purchased and installation is in progress.	

Compliance cluster	Compliance point	Assessment									Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9				
Occupational Safety and Health											Onsite medical facilities and staff.	Ensure that the number of onsite medical staff in the workplace is in line with the requirements of the law.	15 additional first aid boxes were installed.	48
	Health Services and First Aid	●	●	◐	◐	◐	●	◐	◐	●	First aid boxes/supplies in the workplace.	Ensure that there accessible first aid boxes in the workplace.	Annual medical check were completed for all workers in stamping area. Other departments are in progress.	
											Pre-assignment and/or annual medical checks for workers.	Provide pre-assignment and/or annual medical checks for workers.		
	OSH Management Systems	●	●	○	●	○	●	◐	●	○			The employer conduct a self assessment of OSH issues in the workplace.	
											Toilets.	Ensure that there are sufficient toilets in the workplace.		48
	Welfare Facilities	●	◐	●	●	●	◐	◐	●	◐			The workplace is kept clean and tidy.	
	Worker Accommodation	○	○	○	○	○	○	○	○	○				
											Workplace temperature.	Ensure that workplace temperature is acceptable.		48
	Working Environment	●	◐	◐	◐	●	●	●	◐	●	Workplace lighting.	Ensure that there is adequate lighting in the workplace.		

Compliance cluster	Compliance point	Assessment									Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9				
	Worker Protection										Providing workers with personal protective clothing and equipment.	Provide PPE to workers.		6
											Accommodating standing workers.	Provide standing mats or footrest to all standing workers.		
											Training of workers to use machines and equipment safely.	Train workers to use machines safely.		
											Installing guards on all dangerous moving parts of machines and equipment.	Install guards on all dangerous moving parts of machines.	The employer trained and/or encouraged workers to use the personal protective equipment provided.	
Working Time	Leave												The employer provides time off to eligible workers for breastfeeding breaks.	
											Limits on overtime hours worked.	Limit overtime hours to less than 80 in 13 weeks.		48
	Overtime										Authorisation from the Department of Labour for overtime.	Request authorization from MAST before working overtime.		
	Regular Hours													

Percentage of piece rate workers earning 300 (320 Gourdes as of May 2015) or more for eight hours of work (workers' average earnings):

Oct-13	Apr-14	Oct-14	Apr-15
9%	2%	0%	0%

H & H Textiles

Location: Port-au-Prince
Number of workers: 1986
Date of registration: 20-Jan-14
Date of last BW assessment: 11-Nov-14

- Factory was found non-compliant.
- ◐ Factory was progressing
- Factory was compliant.

Advisory and Training Services

Date	Activity
26-Feb-15	Follow up with compliance, HR and general manager on HR related issues, training plan and OSH recommendations.
14-Apr-15	Meeting with management and union representatives to discuss emergency preparedness issues and termination and disciplinary measures procedures.
29-Apr-15	Participation in an industry seminar on Better Work's revised service delivery model
13-May-15	Introduction of Self Diagnosis process to management.
24-Jun-15	Meeting with Compliance team and HR manager to discuss the creation of an OSH committee and PICC at the factory. Factory tour with HR and compliance officer.
23-Jul-15	Meeting with General manager, HR managers and two unions representatives to discuss compensation for production targets. Union reached an agreement with the management on new quotas remuneration brackets.
12-Aug-15	Meeting with Compliance manager and HR managers. Planning of PICC training and review of self diagnosis process.
3-Sep-15	PICC training for workers representatives

Compliance cluster	Compliance point	Assessment		Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2				
Child Labour	Child Labourers	○	○				
	Documentation and Protection of	○	○				
	Young Workers	○	○				
	Hazardous Work	○	○				
	Unconditional Worst Forms	○	○				
Discrimination	Gender	○	○				
	Race and Origin	○	○				
	Religion and Political Opinion	○	○				
Forced Labour	Bonded Labour	○	○				
	Coercion	○	○				
	Forced Labour and Overtime	○	○				

Compliance cluster	Compliance point	Assessment		Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2				
Freedom of Association and Collective Bargaining	Prison Labour	☐	☐				
	Collective Bargaining	☐	☐				
	Interference and Discrimination	☐	☐				
	Strikes	☐	☐				
	Union Operations	☐	☐				
Compensation	Method of Payment	☐	☐				
	Minimum Wage	☐	☐				
	Overtime Wages	☐	☐				
	Paid Leave	☐	☐				
	Premium Pay	☐	☐				
	Social Security and Other Benefits	☐	☐				
Contracts and Human Resources	Wage Information, Use and Deduction	☐	☐				
	Contracting Procedures	☐	☐				
	Dialogue, Discipline and Disputes	☒	☐				
	Employment Contracts	☐	☐				
				Reasons for termination.	Specify reason for termination in terminated workers' files.		6
				Opportunity for workers to defend themselves before termination based on conduct or performance.	All workers must be offered the opportunity to defend themselves before termination based on conduct or performance.		
				Reductions in workforce size due to changes in operations.	Send prior notification to MAST before reduction of workforce due to changes in operations.		
	Termination	☒	☒	Payment for unused paid annual leave upon resignation or termination.	Pay remaining annual leave allowances to all eligible workers upon resignation or termination.		
				Suspension of workers due to lack of materials, force majeure, or accident resulting in an immediate work stoppage.	A notification must be sent to MAST concerning suspension of workers in instances resulting in an immediate work stoppage.		
				Annual salary supplement or bonus upon termination.	Pay salary supplement or bonus to all eligible workers upon resignation or termination.		
Chemicals and Hazardous Substances		☐	☒	Storage of chemicals and hazardous substances.	Properly store all chemicals and hazardous substances to avoid contamination and spills.	All chemicals have been moved to the appropriate storage area.	
	Emergency Preparedness	☐	☒	Storage of flammable materials	Properly store all flammable materials.	All flammable materials have been properly stored.	

Compliance cluster	Compliance point	Assessment 1 2	Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
Occupational Safety and Health	Health Services and First Aid	● ●	Onsite medical facilities and staff.	Hire three additional nurses to meet law requirements with regards to the number of workers at the workplace.		6
	OSH Management Systems	● ●	Assessment of general occupational safety and health issues in the factory.	Perform an assessment of general occupational safety and health issues at the workplace.		6
	Welfare Facilities	● ●	Washing facilities and/or soap.	Provide soap at the factory at all time during working hours.	The factory is providing soap in washing facilities at all time.	6
	Worker Accommodation	○ ○				
	Working Environment	○ ○				
Working Time	Worker Protection	○ ○				
	Leave	○ ●	Time off for breastfeeding breaks.	Provide paid breastfeeding breaks to nursing workers who are eligible to this benefit.		
	Overtime	○ ○				
	Regular Hours	○ ●	Working time records.	Ensure time records reflect actual working hours.		

Percentage of piece rate workers earning 300 (320 Gourdes as of May 2015) or more for eight hours of work (workers' average earnings):

Oct-14	Apr-15
0%	0%

Horizon Manufacturing S.A.

Location: Port-au-Prince
Number of workers: 396
Date of registration: 25-Aug-10
Date of last BW assessment: 9-Jun-15

- Factory was found non-compliant
- ◐ Factory was progressing
- No-evidence of non-compliance

Advisory and Training Services

Date	Activity
26-Mar-15	PICC meeting
21-Apr-15	Advisory on lightning requirements, Factory tour and Introduction to Better Work revised service delivery model.
29-Apr-15	Participation in an industry seminar on Better Work's revised service delivery model
30-Apr-15	PICC meeting
28-May-15	PICC meeting
25-Jun-15	PICC meeting
30-Jul-15	PICC meeting - Intro meeting
06-Aug-15	Advisory of self-diagnosis and the use of the self-diagnostic tool.
27-Aug-15	PICC meeting
09-Sep-15	Workers rights and responsibilities training.
10-Sep-15	Workers rights and responsibilities training.
24-Sep-15	PICC Meeting

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
Child Labour	Child Labourers	○	○	○	○	○	○	○	○	○	○				
	Documentation and Protection of Young Workers	○	○	○	○	○	○	○	○	○	○				
	Hazardous Work	○	○	○	○	○	○	○	○	○	○				
	Unconditional Worst Forms	○	○	○	○	○	○	○	○	○	○				
Discrimination	Gender	○	○	○	○	○	○	○	●	○	○				
	Race and Origin	○	○	○	○	○	○	○	○	○	○				
	Religion and Political Opinion	○	○	○	○	○	○	○	○	○	○				
Forced Labour	Bonded Labour	○	○	○	○	○	○	○	○	○	○				
	Coercion	○	○	○	○	○	○	○	○	○	○				
	Forced Labour and Overtime	○	○	○	○	○	○	○	○	○	○				
	Prison Labour	○	○	○	○	○	○	○	○	○	○				
Freedom of Association and Collective Bargaining	Collective Bargaining	○	○	○	○	○	○	○	○	○	○				
	Interference and Discrimination	○	○	○	○	○	○	○	○	○	○				
	Strikes	○	○	○	○	○	○	○	○	○	○				

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
Compensation	Union Operations	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Method of Payment	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Minimum Wage	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Overtime Wages	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Paid Leave	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Premium Pay	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Social Security and Other Benefits	☒	☐	☐	☐	☐	☐	☐	☐	☐	☒	Employer contribution to OFATMA for maternity and health insurance.	Enroll to OFATM maternity and Health Insurance, collect and forward workers' contribution to OFATMA		
Contracts and Human Resources	Wage Information, Use and Deduction	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Contracting Procedures	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Dialogue, Discipline and Disputes	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Employment Contracts	☒	☒	☒	☐	☐	☐	☐	☐	☐	☐				
	Termination	☐	☐	☐	☐	☐	☐	☐	☐	☒	☐				
Occupational Safety and Health	Chemicals and Hazardous Substances	☐	☒	☒	☒	☐	☒	☐	☒	☐	☐				
	Emergency Preparedness	☐	☒	☐	☒	☐	☒	☒	☐	☐	☐				
	Health Services and First Aid	☒	☒	☒	☒	☒	☒	☒	☒	☐	☐				
	OSH Management Systems	☒	☐	☒	☐	☐	☐	☐	☐	☐	☐				
	Welfare Facilities	☒	☒	☒	☐	☐	☒	☐	☒	☐	☐				
	Worker Accommodation	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
												Workplace temperature	Reduce the workplace temperature		24
	Working Environment	☐	☒	☐	☒	☐	☒	☒	☒	☒	☒	Workplace lighting.	Increase the workplace lighting.	The factory installed transparent plastic fiberglass roofing sheets in order to increase the lighting.	
Working Time	Worker Protection	☐	☒	☒	☐	☒	☐	☐	☐	☐	☐				
	Leave	☐	☒	☐	☐	☐	☐	☐	☐	☒	☐				
	Overtime	☒	☐	☒	☒	☐	☐	☐	☐	☒	☐				
	Regular Hours	☒	☒	☒	☐	☐	☐	☐	☐	☐	☐				

Percentage of piece rate workers earning 300 (320 Gourdes as of May 2015) or more for eight hours of work (workers' average earnings):

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
	Apr-14	Oct-15			Apr-15			Oct-15							
	37%	65%			65%			45%							

Indigo Mountain Haiti S.A.

Location: Port-au-Prince
 Number of workers: 247
 Date of registration: 15-Mar-12
 Date of last BW assessment 4-Aug-15

- Factory was found non-compliant.
- ◐ Factory was progressing
- Factory was compliant.

Advisory and Training Services

Date	Activity
24-Feb-15	Meeting with Factory owner to discuss new remediation approach. Discussion with HR manager on setting up new OSH committee and OSH training needs.
10-Mar-15	Meeting with HR manager to discuss the training plan for OSH committee and supervisors.
10-Apr-15	Meeting with Factory owner to discuss the establishment of the PICC and introduction to the adjusted model of BWH services.
21-Apr-15	Training: Occupational safety and health awareness for OSH committee
19-Jun-15	Meeting with HR manager to discuss new internal Policies to be approved and implemented. Also discussed the establishment of a PICC and follow up on OSH committee's activities.
23-Jul-15	Meeting with new HR/compliance manager to discuss the improvement process.
11-Aug-15	Meeting with HR manager and new general manager to discuss the initial findings from the last assessment report.

Compliance cluster	Compliance point	Assessment							Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7				
Child Labour	Child Labourers	○	○	○	○	○	○	○				
	Documentation and Protection of Young Workers	○	○	○	○	○	○	○				
	Hazardous Work	○	○	○	○	○	○	○				
	Unconditional Worst Forms	○	○	○	○	○	○	○				
	Gender	○	○	○	○	○	○	○				
Discrimination	Race and Origin	○	○	○	○	○	○	○				
	Religion and Political Opinion	○	○	○	○	○	○	○				
	Bonded Labour	○	○	○	○	○	○	○				
Forced Labour	Coercion	○	○	○	○	○	○	○				
	Forced Labour and Overtime	○	○	○	○	○	○	○				
	Prison Labour	○	○	○	○	○	○	○				
	Collective Bargaining	○	○	○	○	○	○	○				
Freedom of Association and Collective Bargaining	Interference and Discrimination	○	○	○	○	○	○	○				
	Strikes	○	○	○	○	○	○	○				
	Union Operations					○	○	○				
	Method of Payment	●	○	○	○	○	○	○				

Compliance cluster	Compliance point	Assessment							Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7				
	Minimum Wage	☐	☐	☐	☐	☐	☐	☒	Payment of minimum wage for full time workers.	Ensure minimum wage payment for all workers who completed at least 8 hours of work		
	Overtime Wages	☒	☒	☐	☐	☐	☐	☒	Payment for ordinary overtime.	Ensure that all workers who work overtime are paid at least 50% above normal wage for overtime hours worked.		
									Payment for weekly rest days.	Provide payment for weekly rest day to workers who complete 6 consecutive days of work or 48 hours.		6
	Paid Leave	☒	☒	☐	☐	☐	☒	☒	Payment for annual leave.	Payment for annual leave must be based on average salary earned for the year.		
									Payment for sick leave.	Payment for sick leave must be paid based on average salary earned.		
									Payment for maternity leave.	Payment for maternity leave must be paid based on average salary earned.		
	Premium Pay	☐	☐	☐	☐	☐	☐	☒	Payment for regular hours worked at night.	Workers who work at night must be paid 50% above normal wage for those hours.		

Compliance cluster	Compliance point	Assessment							Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7				
Compensation									Employer contribution to ONA.	Forward employer's contribution to ONA on time.		6
									Collecting and forwarding workers' contributions for social insurance funds to ONA.	Forward worker's contribution to ONA on time.		
									Employer contribution to OFATMA for work-related accident insurance.	Submit payment to OFATMA for work related accident insurance.		
	Social Security and Other Benefits	●	◐	●	○	○	●	●	Employer contribution to OFATMA for maternity and health insurance.	Register all workers to OFATMA for maternity and health insurance and make necessary contribution.		
									Forwarding of workers' contributions to OFATMA.	Collect and forward workers contribution for maternity and health insurance to OFATMA		
									Payment of annual salary supplement or bonus.	Provide adequate payment for annual salary supplement or bonus.		
									Payroll records.	All payment must be recorded appropriately and accurately in the main payroll reporting system.		
	Wage Information, Use and Deduction	●	●	○	○	○	○	●				
Contracting Procedures		○	○	○	○	○	○	○				
									Disciplinary measures.	The factory must submit the internal work rules which include disciplinary measures to MAST for approval.		
	Dialogue, Discipline and Disputes	○	○	●	●	○	○	●	Bullying, harassment or humiliating treatment of workers.	The factory must take actions to eradicate any type of verbal abuse in the workplace.		
Employment Contracts		○	○	○	○	○	●	●	Internal work rules.	Submit internal work rules to MAST for approval.		6

Compliance cluster	Compliance point	Assessment							Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7				
Contracts and Human Resources	Termination								Notice of termination.	Provide adequate payment for compensation of notice based on average salary.		6
									Payment for unused paid annual leave upon resignation or termination.	The factory must provide proper payment based on average salary for unused annual leave upon termination.		
									Annual salary supplement or bonus upon termination.	The factory must provide proper payment based on average salary for annual bonus upon termination.		
									Reductions in workforce size or suspensions due to changes in operations	The factory must send advance notification to MAST when reducing workforce due to changes in operations.		
										The factory has revised the HR procedures to ensure proper documentation of terminations.		

Compliance cluster	Compliance point	Assessment							Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7				
Chemicals and Hazardous Substances									Inventory of chemicals and hazardous substances used in the workplace.	Keep an inventory of chemicals and hazardous substances used in the workplace.		24
									Washing facilities or cleansing materials in the event of chemical exposure.	Install eye wash stations in the workplace where chemicals are stored or in use.		
											The factory has taken actions to ensure that all chemical containers were properly labelled.	
Emergency Preparedness											The factory has taken appropriate actions to assess and monitor workers exposure to hazardous substances.	18
									Firefighting equipment.	Ensure that all fire-fighting equipment are regularly inspected and well maintained.		
									Training workers to use the firefighting equipment.	The factory must train at least 10% of the workforce to use firefighting equipment.		
									Accessible, unobstructed, and/or unlocked emergency exits during working hours, including overtime.	All emergency exits must be kept accessible, unobstructed, and unlocked during working hours, including overtime.		

Compliance cluster	Compliance point	Assessment							Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7				
Occupational Safety and Health	Health Services and First Aid								Medical checks for workers upon hiring.	Ensure that the factory has a sufficient number of onsite medical staff.		36
		●	◐	●	◐	●	●	◐	Onsite medical facilities and staff.	Ensure that workers receive the appropriate medical checks.		
									First-aid training for workers. Annual medical checks for workers.		Workers using chemicals received free medical checks.	
	OSH Management Systems								Written OSH policy.	Elaborate a written OSH policy.		36
									Assessment of general occupational safety and health issues in the factory.	Conduct self assessment on OSH on a regular basis at the factory.		
		●	●	◐	●	●	◐	●	Mechanisms to ensure cooperation between workers and management on OSH matters.	The factory must ensure that the existing OHS committee is active in the workplace.		
	Welfare Facilities								Washing facilities and/or soap.	Ensure that soap is available for the workers.		36
									Providing drinking water.	Provide clean and safe drinking water.		
		●	●	●	●	●	●	●	Toilets.	Ensure that sufficient toilets are available in the workplace.		
									Eating area.	Provide an adequate eating area for workers.		
	Worker Accommodation	○	○	○	○	○	○	○	Workplace temperature.	Ensure that temperature in the workplace is acceptable.		18
	Working Environment	●	●	○	●	◐	●	●	Workplace lighting.	Ensure that the workplace is adequately lit.		

Compliance cluster	Compliance point	Assessment							Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7				
Worker Protection									Ergonomic requirements.	Provide chairs with back rest for all workers.		36
									Installing, grounding, and/or maintaining electrical wires, switches, and/or plugs.	Install guards on all dangerous moving parts of machines and equipment.		
									Posting safety warnings in the workplace.	Post safety warnings in generators and fuel tank area.		
											The factory has provided workers with the appropriate PPE. The factory has trained workers to use their PPEs. The factory has provided training for workers to use machines and equipment safely. The factory has provided fatigue mats to accommodate standing	
Working Time	Leave											
	Overtime								Authorization from the Department of Labour for overtime.	The factory must request prior authorization from MAST before working overtime hours.		
									Working time records.	Record all working time in the attendance system to ensure time records reflect actual working time.		
	Regular Hours											

Percentage of piece rate workers earning 300 (320 Gourdes as of May 2015) or more for eight hours of work (workers' average earnings):

Oct-13	Apr-14	Oct-14	Apr-15	Oct-15
0%	0%	18%	39%	0%

Interamerican Wovens S.A.

Location: Port-au-Prince
 Number of workers: 776
 Date of registration: 28-Oct-09
 Date of last BW assessment: 30-Jun-15

- Factory was found non-compliant
- ◐ Factory was progressing
- No evidence of non-compliance

Advisory and Training Services

Date	Activity
4-Mar-15	Meeting with workers interested in being part of the PICC in order to discuss the next steps of the process.
5-Mar-15	Meeting with candidates of the PICC in order to distribute the campaign materials.
	Meeting with management to discuss the next steps in the PICC process and upcoming elections.
9-Mar-15	PICC elections
10-Mar-15	Factory visit to announce the elected PICC workers representatives. Meeting with Management to prepare the initial PICC training.
9-Apr-15	Meeting with the HR manager and Compliance manager to discuss the next steps in the PICC implementation and to decide on training dates for management and workers PICC representatives to be held in April 2015.
25-Apr-15	PICC training
29-Apr-15	Participation in an industry seminar on Better Work's revised service delivery model
29-May-15	PICC meeting.
26-Jun-15	PICC meeting.
31-Jul-15	PICC meeting.
28-Aug-15	PICC meeting.
2-Sep-15	Meeting with compliance officer regarding self diagnosis tool and OSH management systems.
9-Sep-15	Workers Rights and Responsibilities Training.
10-Sep-15	Workers Rights and Responsibilities Training.
11-Sep-15	Workers Rights and Responsibilities Training.

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
Child Labour	Child Labourers	○	○	○	○	○	○	○	○	○	○				
	Documentation and Protectino of Young Workers	○	○	○	○	○	○	○	○	○	○				
	Hazardous Work	○	○	○	○	○	○	○	○	○	○				
	Unconditional Worst Forms	○	○	○	○	○	○	○	○	○	○				
Discrimination	Gender	●	●	○	○	○	○	○	○	○	○				
	Race and Origin	○	○	○	○	○	○	○	○	○	○				
	Religion and Political Opinion	●	●	○	○	○	○	○	○	○	○				
Forced Labour	Bonded Labour	○	○	○	○	○	○	○	○	○	○				
	Coercion	○	○	○	○	○	○	○	○	○	○				
	Forced Labour and Overtime	○	○	○	○	○	○	○	○	○	○				

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
Freedom of Association and Collective Bargaining	Prison Labour	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Collective Bargaining	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Interference and Discrimination	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Strikes	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Union Operations	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐				
Compensation	Method of Payment	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Minimum Wage	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Overtime Wages	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Paid Leave	☐	☐	☐	☒	☐	☐	☒	☐	☐	☐				
	Premium Pay	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
												Employer contribution to ONA.	Pay employer contribution to ONA on time.		18
												Collecting and forwarding of workers' contributions for social insurance funds to ONA.	Collect and forward of workers' contributions for social insurance funds to ONA on time.		
	Social Security and Other Benefits	☒	☒	☒	☐	☒	☐	☒	☒	☒	☒	Employer contribution to OFATMA for maternity and health insurance.	The employer needs to finalize it affiliation with the OFATMA health and maternity insurance		
												Forwarding of workers' contributions to OFATMA	The employer needs to finalize it affiliation with the OFATMA health and maternity insurance		
	Wage Information, Use and Deduction	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐				
	Contracting Procedures	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
Contracts and Human Resources	Dialogue, Discipline and Disputes	☐	☐	☐	☐	☒	☐	☒	☐	☐	☐				
	Employment Contracts	☐	☒	☒	☒	☐	☐	☐	☐	☐	☐				
	Termination	☒	☐	☐	☐	☒	☒	☐	☐	☐	☐				

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
Chemicals and Hazardous Substances												Washing facilities or cleansing materials in the event of chemical exposure.	Provide adequate washing facilities or cleansing materials in the event of chemical exposure.		12
												Labeling of chemicals and hazardous substances.	Ensure that all chemicals and hazardous substances are labeled		
												Chemical safety data sheets for all chemicals and hazardous substances in the workplace	Ensure that MSDS's are available for all chemicals and hazardous substances used in the workplace		
												Storage of chemicals and hazardous substances.	Ensure that all chemical and hazardous substances are properly stored		
												Assessing, monitoring, preventing and/or limiting workers' exposure to hazardous substances.	The factory must assess, monitor, prevent, and limit worker's exposure to hazardous substances.	Workers who work with chemicals and hazardous substances were trained.	
Emergency Preparedness												Fire detection and alarm system.	Install adequate fire detection and alarm system in the warehouse.	All exits and escape routes are marked and posted	12
												Firefighting equipment.	Install adequate firefighting equipment in the warehouse.		
												Accessible, unobstructed, and/or unlocked emergency exits during working hours, including overtime.	Ensure that all exits are accessible, unobstructed and unlocked during all working hours		
												Periodic emergency drills.	Conduct periodic emergency drills		

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
Occupational Safety and Health	Health Services and First Aid											Onsite medical facilities and staff.	Provide onsite medical facilities and staff as required by law.		54
												First aid boxes/supplies in the workplace.	Install first aid boxes/supplies in the warehouse.		
												Pre-assignment and/or annual medical checks for workers.	Provide pre-assignment and/or annual medical checks for workers.		
	OSH Management Systems											Health checks for workers who are exposed to work-related hazards.	Provide health checks for workers who are exposed to work-related hazards.		
												Assessment of general occupational safety and health issues in the factory.	Conduct an assessment of general occupational safety and health issues in the factory.		
												Toilets.	Increase the number of toilets as required by the law.		54
												Eating area.	Provide an adequate eating area.		
	Worker Accommodation														
	Working Environment											Workplace temperature.	Reduce workplace temperature.		24
														The light levels are appropriate in the different sections.	

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
	Worker Protection	●	◐	●	◐	●	◐	◐	◐	◐	◐	Providing workers with personal protective clothing and equipment. Training and encouragement of workers to use PPE, machines and/or equipment safely. 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.	Provide workers with the necessary PPE where needed. Train and encourage the workers to use PPE and machines safely. Install guards on all dangerous moving parts of machines and equipment. Ensure that electrical wires and switches are installed, grounded and maintained properly. Appropriate safety warnings need to be posted in the workplace.	Standing workers are appropriately accommodated.	30
Working Time	Leave	◐	◐	●	●	◐	◐	◐	◐	●	◐				
	Overtime	●	◐	●	●	◐	●	◐	◐	◐	◐				
	Regular Hours	●	◐	●	◐	◐	◐	◐	◐	◐	●			Working time records are accurate.	

Percentage of piece rate workers earning 300 (320 Gourdes as of May 2015) or more for eight hours of work (workers' average earnings):

Oct-13	Apr-14	Oct-14	Apr-15	Oct-15
12%	9%	26%	12%	14%

Modas Bu II S.A.

Location: Port-au-Prince
Number of workers: 1234
Date of registration: 14-Aug-13
Date of last BW assessment: 2-Jun-15

- Factory was found non-compliant
- ◐ Factory was progressing
- No-evidence of non-compliance

Advisory and Training Services

Date	Activity
04-Mar-15	Meeting with the management in order to discuss the development of the PICC and also to give them tools and resources to render the process more efficient and transparent.
10-Apr-15	Meeting with the Compliance and HR managers to discuss the management's involvement in the PICC process. Factory tour.
17-Apr-15	Meeting with the management of MBI with USDOL regarding follow up on a previous FOA non-compliance point.
28-Apr-15	PICC meeting
30-May-15	PICC meeting
18-Aug-15	Management intro meeting and discussion on the needed improvements.
17-Sep-15	Meeting with management of MBI along with representatives of USDOL and buyer representatives to discuss the pending international labor standards issues at MBI, the remediation plan and timelines.

Compliance cluster	Compliance point	Details of non-compliance				Improvement Priorities	Remediation Efforts	Months
		1	2	3	4			
Child Labour	Child Labourers	○	○	○	○			
	Documentation and Protection of Young Workers	○	○	○	○			
	Hazardous Work	○	○	○	○			
	Unconditional Worst Forms	○	○	○	○			
	Gender	○	○	○	●	Terminating workers or forcing them to resign if they are pregnant, on maternity leave or nursing.	Factory must ensure that pregnant woman are not unjustly terminated	The factory agreed to rehire terminated pregnant woman.
Discrimination	Race and Origin	○	○	○	○			
	Religion and Political Opinion	○	○	○	○			
Forced Labour	Bonded Labour	○	○	○	○			
	Coercion	○	○	○	○			
	Forced Labour and Overtime	○	○	○	○			

Compliance cluster	Compliance point	Details of non-compliance				Improvement Priorities	Remediation Efforts	Months
		1	2	3	4			
Freedom of Association and Collective Bargaining	Prison Labour	☐	☐	☐	☐			
	Collective Bargaining	☐	☐	☐	☐			
	Interference and Discrimination	☐	☐	☐	☒	Termination or non-renewal of worker's employment contract due to union membership or activities.	Reinstate workers terminated due to union membership or activities.	The factory agreed to rehire one terminated union representative.
	Strikes	☐	☐	☐	☐			
	Freedom to Associate	☐	☐	☒	☒	Freedom to form a union.	Allow workers to freely form a union.	6
	Union Operations	☐	☐	☐	☐			
	Method of Payment	☐	☐	☐	☐			
Compensation	Minimum Wage	☐	☐	☐	☒	Payment of minimum wage for full time workers.	Factory must comply with the minimum wage increase.	The factory paid backpay for the new minimum wages to all full time workers.
	Overtime Wages	☐	☐	☐	☒	Payment for ordinary overtime.	Factory must pay workers correctly for ordinary overtime.	
	Paid Leave	☒	☐	☐	☐			
	Premium Pay	☐	☐	☐	☐			
						Employer contribution to OFATMA for work-related accident insurance.	Employer must forward contribution to OFATMA regularly and in a timely manner.	
	Social Security and Other Benefits	☒	☐	☐	☒	Employer contribution to OFATMA for maternity and health insurance.	Employer must forward contribution to OFATMA regularly and in a timely manner.	
						Forwarding of workers' contributions to OFATMA.	Employer must forward contribution to OFATMA regularly and in a timely manner.	

Compliance cluster	Compliance point	Details of non-compliance				Improvement Priorities	Remediation Efforts	Months
		1	2	3	4			
Contracts and Human Resources	Wage Information, Use and Deduction	☐	☐	☐	☒	Payroll records.	Factory must ensure that there is one accurate payroll in the work place	
	Contracting Procedures	☐	☐	☐	☐			
	Dialogue, Discipline and Disputes	☐	☐	☐	☐			
	Employment Contracts	☐	☐	☐	☐			
							The factory informed MAST before any workforce reductions.	
	Termination	☒	☐	☒	☐		The factory implemented a new HR procedure which will provide workers the opportunity to defend themselves prior to termination	
Chemicals and Hazardous Substances						Washing facilities or cleansing materials in the event of chemical exposure.	Have eye wash bottles near places in the workplace where chemicals are being used.	18
		☒	☐	☒	☐		The factory ensure that there are more frequent and regular trainings for workers who work with chemicals.	

Compliance cluster	Compliance point	1	2	3	4	Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
Occupational Safety and Health	Emergency Preparedness					Fire detection and alarm system.	Ensure that there are functioning fire detection and alarm systems.		18
						Periodic emergency drills.	Factory must conduct period emergency drills.		
						Safe guarding possible sources of ignition.	All possible sources of ignition must be safe guarded.		
								Escape routes are marked and posted.	
	Health Services and First Aid					Onsite medical facilities and staff.	Ensure that there is a sufficient number of onsite medical staff.		18
								The factory implemented the required medical checks for workers.	
								At least 10% of the workforce are trained in first aid.	
Occupational Safety and Health	OSH Management Systems							Health checks are provided to workers exposed to work related hazards and chemicals.	
						Assessment of general occupational safety and health issues in the factory.	The factory must conduct an assessment of general occupational safety and health issues in the factory.		

Compliance cluster	Compliance point	1	2	3	4	Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
						Toilets.	Ensure that the number of toilets complies with the requirements of the law.		18
	Welfare Facilities	●	●	●	◐	Providing drinking water.	Test the water quality on a regular basis.	The factory ensured that there is adequate soap in the workplace	
	Worker Accommodation	○	○		○	Workplace temperature and/or ventilation.	The factory must ensure that the emperature in the workplace is acceptable		
	Working Environment	●	◐	○	●	Workplace lighting.	The factory needs to ensure that there is the appropriate lux level in all sections		

Compliance cluster	Compliance point	1	2	3	4	Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
	Worker Protection	●	●	◐	◐	Training and encouragement of workers to use the personal protective equipment provided. Providing workers with personal protective clothing and equipment. Posting safety warnings in the workplace.	Train and encourage workers to use the personal protective equipment provided. Appropriate PPE must be provided to workers as no cost where needed. Appropriate safety warnings must be posted in the workplace where needed.	Workers are trained to use machines safely. Guards have been installed on dangerous moving parts of machines.	18
	Leave	○	●	●	○			Time off for breastfeeding breaks is now provided.	
Working Time	Overtime	●	○	●	○			The factory has requested authorization to MAST prior to working overtime.	
	Regular Hours	○	●	○	○				

Percentage of piece rate workers earning 300 (320 Gourdes as of May 2015) or more for eight hours of work (workers' average earnings):

Apr-14	Oct-14	Apr-15	Oct-15
1%	21%	20%	59%

MGA Haiti S.A.

Location: Port-au-Prince
Number of workers: 960
Date of registration: 8-Oct-09
Date of last BW assessment: 21-Jul-15

- Factory was found non-compliant
- ◐ Factory was progressing
- No-evidence of non-compliance

Advisory and Training Services

Date	Activity
8-Apr-15	Advisory on the content and elaboration of a new compliant Freedom of Association policy. Discussion on the formation and implementation of the PICC. Advisory on
16-Apr-15	Work session on the new FOA policy for the factory. Discussion on PICC election and training plan. Follow up on fired workers reported by the Unions to USDOL and Better
29-Apr-15	Participation in an industry seminar on Better Work's revised service delivery model
13-May-15	Advisory on PICC set up and Freedom of Association
14-May-15	Advisory on discrimination and disciplinary measures
21-May-15	PICC formation - Meeting with the Unions in the factory
5-Jun-15	Meeting with Unions on PICC formation and freedom of association policy
15-Jun-15	PICC training
16-Jun-15 to 18-Jun-15	Supervisory skills training
23-Jun-15 to 25-Jun-15	Supervisory skills training
23-Jun-15	Meeting with Unions on freedom of association policy
7-July-15 to 8-July-15	Negotiation skill training
9-Jul-15	Advisory on payroll records, temporary suspension and Freedom of association.
21-July-15 to 22-July-15	Negotiation skill training
6-Aug-15	Advisory on temporary suspension. Discussion with Union representatives on their PICC members.
11-Aug-15	PICC training

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Child Labour	Child Labourers	○	○	○	○	○	○	○	○	○	○	○				
	Documentation and Protection of Young	○	○	○	○	○	○	○	○	○	○	○				
	Hazardous Work	○	○	○	○	○	○	○	○	○	○	○				
	Unconditional Worst Forms	○	○	○	○	○	○	○	○	○	○	○				
Discrimination	Gender	○	○	○	○	○	○	○	○	○	○	○				
	Other Grounds	○	○	○	○	○	○	○	○	○	○	○				
	Race and Origin	○	○	○	○	○	○	○	○	○	○	○				
	Religion and Political Opinion	○	○	○	○	○	○	○	○	○	○	○				
Forced Labour	Bonded Labour	○	○	○	○	○	○	○	○	○	○	○				
	Coercion	○	○	○	○	○	○	○	○	○	○	○				
	Forced Labour and Overtime	○	○	○	○	○	○	○	○	○	○	○				
	Prison Labour	○	○	○	○	○	○	○	○	○	○	○				
Freedom of Association and	Collective Bargaining	○	○	○	○	○	○	○	○	○	○	○				
	Interference and Discrimination	○	○	○	○	○	●	◐	○	○	○	○				

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Collective Bargaining	Strikes	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Union Operations	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Method of Payment	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☒	Wage payment directly to workers at the workplace on working days	Ensure that all workers are paid directly at the workplace and during working days.		
	Minimum Wage	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☒	Payment of minimum wage for full time workers	Ensure that all full time workers are paid at least minimum wage		
	Overtime Wages	☐	☐	☐	☒	☐	☐	☐	☐	☐	☐	☒	Payment for ordinary overtime.	Ensure that workers are paid 50% above normal overtime.		
Compensation															Workers are paid correctly for annual leave.	6
	Paid Leave	☒	☒	☐	☐	☐	☐	☐	☐	☐	☐	☒	Payment of sick leave.	Ensure that payment for sick leave is based on average earning of the workers and not on minimum wage.		
													Payment of maternity leave.	Ensure that payment for maternity leave is based on average earning of the workers and not on minimum wage.		
	Premium Pay	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
	Social Security and Other Benefits	●	◐	○	●	○	●	○	●	○	○	●	Employer contribution to ONA.	Forward employer's contribution to ONA		
													Collecting and forwarding workers' contributions for social insurance funds to ONA.	Collect and forward workers' contributions for social insurance funds to ONA		
													Employer contribution to OFATMA for maternity and health insurance.	Forward employer's contribution to OFATMA for maternity and health insurance.		
													Forwarding of workers' contributions to OFATMA.	Forward workers' contributions to OFATMA.		
	Wage Information, Use and Deduction	●	○	○	○	○	○	○	○	○	○	●	Payroll records.	Ensure that the factory keeps one accurate payroll records.		
Contracts and Human Resources	Contracting Procedures	○	○	○	○	○	○	○	○	○	○	○				
	Dialogue, Discipline and Disputes	●	○	○	○	○	○	●	○	●	○	○				
	Employment Contracts	●	●	●	○	●	○	○	○	○	○	○				
	Termination	●	○	○	○	○	●	●	○	○	○	●	Reduction in workforce size or suspension due to change in operations.	Ensure that Unions in the factory are consulted in case of temporary or permanent suspension due to lack of work. Ensure that MAST is notify of all suspension of workers.		

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Occupational Safety and Health	Chemicals and Hazardous Substances	●	◐	●	◐	●	●	◐	○	●	◐	●	Labelling of chemicals and hazardous substances.	Properly label all chemicals and hazardous substances used in the workplace.		12
													Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Ensure that chemical safety data sheets are available in all locations where chemicals and hazardous substances are in use or stored in the workplace.		
													Washing facilities or cleansing materials in the event of chemical exposure.	Provide accessible cleansing materials in all areas where chemicals are being used or stored for use in the event of accidental exposure.		
	Emergency Preparedness	●	◐	●	◐	●	◐	◐	●	◐	◐	◐	Accessible, unobstructed, and/or unlocked emergency exits during working hours, including overtime.	Ensure that all exits and escape routes remain unblocked during working time.	The factory ensured that all fire-fighting equipment's are available and functioning.	60
Occupational Safety and Health	Health Services and First Aid	●	◐	●	●	●	●	◐	◐	◐	●	◐	Onsite medical facilities and staff.	Comply with the number of medical staff required by the law.		60
													Pre-assignment and/or annual medical checks for workers.	Provide pre-assignment and/or annual medical checks for workers.		
													First aid boxes/supplies in the workplace.	Ensure that first aid boxes are adequately equipped according the inventory list posted on them.	The factory provides health checks twice a year for workers who are exposed to work-related hazards.	
	OSH Management Systems	●	◐	○	●	○	●	○	●	○	○	○				

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Welfare Facilities													Providing drinking water	Ensure that drinking water is available at all time for workers during working hours.		60
		●	●	●	●	●	●	●	●	●	●	●	Toilets.	Provide the number of toilets required by the Haitian Labour code.		
													Eating area.	Provide an eating area to accommodate the workers.		
Worker Accommodation		○	○	○	○	○	○	○	○	○	○	○				
Working Environment													Workplace temperature.	Reduce the temperature in the workplace.		48
		○	○	●	●	●	●	●	●	●	●	●	Workplace lighting.	Increase the lighting in the workplace.		
Worker Protection													Providing workers with personal protective clothing and equipment.	Provide all workers using chemicals and mechanic shop with the appropriate protection equipment.		60
		●	●	●	●	●	●	●	●	●	●	●	Installing, grounding, and/or maintaining electrical wires, switches, and/or plugs.	The factory ensure that all electrical installations are safely maintained to prevent electrical shocks.		
															The factory provides chairs with backrest to all workers.	
															The factory ensures that all machines and equipment have appropriate guards installed.	
Leave		○	○	●	○	●	○	○	○	○	○	○				

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Working Time	Overtime	●	●	○	●	○	●	○	○	○	●	◐	Limits on overtime hours worked	Comply with the limit of overtime hours worked set by the law		6
	Regular Hours	●	◐	○	●	○	○	●	○	○	○	○				

The factory now requests authorization from MAST when there is a need for overtime hours.

The factory now requests authorization from MAST when there is a need to work on Sundays

Percentage of piece rate workers earning 300 (320 Gourdes as of May 2015) or more for eight hours of work (workers’ average earnings):

Apr-14	Oct-14	Apr-15	Oct-15
89%	85%	85%	95%

Multiwear S.A.

Location: Port-au-Prince
 Number of workers: 2211
 Date of registration: 5-Oct-09
 Date of last BW assessment: 3-Dec-14

- Factory was found non-compliant.
- ◐ Factory was progressing
- Factory was compliant.

Advisory and Training Services

Date	Activity
24-Feb-15	Meeting with factory owner to discuss issues on industrial relations in the workplace.
10-Apr-15	PICC Meeting: discussion points, Toilet paper and soap. OFATMA subscription. Incentive bonus. Training
15-Apr-15	Meeting with top management to discuss the introduction of BWH revised service model and the role of PICC.
29-Apr-15	Participation in an industry seminar on Better Work's revised service delivery model
5-May-15	Follow up visit and factory tour to review progress on the improvement plan, agenda of next PICC meeting and training needs.
21-May-15	PICC Meeting: presentation of the BWH service model to the PICC.
19-Jun-15	Discussion with Compliance Manager to plan training needs for the Unions.
19-Jun-15	Training: Occupational safety and health awareness For PICC
12-Jul-15	Training: Negotiation skills
23-Jul-15	PICC Meeting: Discussed the preparation of Self Diagnosis report.
11-Aug-15	Meeting with compliance manager and OHS officer to assist with completion of self diagnosis process.
1-Sep-15	Meeting with top management to discuss IR relations and factory restructuration plan.
10-11 and 14-Sep-15	Training: Workers Rights and Responsibilities.
13-Sep-15	Training: Supervisory Skills Training.
19-Sep-15	PICC Meeting: Discussed OSH non-compliances
22-Sep-15	PICC Meeting: Discussion about self diagnosis findings and other issues in the workplace.

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
Child Labor	Child Labourers	○	○	○	○	○	○	○	○	○	○				
	Documentation and Protection of Young Workers	○	○	●	○	○	○	○	○	○	○				
	Hazardous Work	○	○	○	○	○	○	○	○	○	○				
	Unconditional Worst Forms	○	○	○	○	○	○	○	○	○	○				
Discrimination	Gender	○	○	○	○	○	○	○	○	○	○				
	Race and Origin	○	○	○	○	○	○	○	○	○	○				
	Religion and Political Opinion	○	○	○	○	○	○	○	○	○	○				
Forced Labour	Bonded Labour	○	○	○	○	○	○	○	○	○	○				
	Coercion	●	○	○	○	○	○	○	○	○	○				
	Forced Labour and Overtime	○	○	○	○	○	○	○	○	○	○				

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
Occupational Safety and Health	Emergency Preparedness											Fire detection and alarm system.	Install adequate fire detection and alarm system in warehouses of building 37 and 47.	The fire detection system has been revised in all buildings to ensure compliance.	6
		●	◐	◐	●	●	●	◐	○	●	◐	Marking or posting of emergency exits and/or escape routes in the workplace.	Mark or post emergency exits and/or escape routes in the workplace.	The factory has marked escape routes and update evacuation plan were necessary.	
	Health Services and First Aid											Onsite medical facilities and staff.	The factory must have one additional nurse to meet labor law requirements with regards to the number of medical staff.		54
		●	◐	◐	●	●	◐	◐	◐	●	●	Pre-assignment and/or annual medical checks for workers.	Ensure that all workers receive a medical check at least once a year.		
	OSH Management Systems	●	◐	○	●	○	○	○	○	○	○				
	Welfare Facilities											Washing facilities and/or soap.	Ensure enough soap and paper is available at all times in all restrooms at the factory.	The factory has ensured that enough soap is available during work hours.	54
												Toilets.	Provide the number of toilets required by the Haitian Labor code.		
		●	◐	●	●	●	◐	◐	◐	●	●	Eating area.	Provide an eating area to accommodate the workers.		
												Workplace cleanliness.	Keep the workplace clean and tidy.	The factory has appointed additional janitors to improve cleanliness in the workplace.	
	Worker Accommodation	○	○	○	○	○	○	○	○	○	○				
	Working Environment											Workplace temperature.	Reduce the temperature in the workplace.	The factory has installed additional fans to reduce the temperatures in the workplace.	30
		●	●	●	○	●	●	●	◐	●	●	Workplace lighting.	Adequately light the workplace.		

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
Working Time	Worker Protection	●	●	●	●	●	●	●	●	●	●	Accommodating standing workers. Installing guards on all dangerous moving parts of machines and equipment.	Ensure that all standing workers are properly accommodated. The factory must install guards on all dangerous moving parts of machines and equipment.	The factory has provided additional fatigue mats to accommodate all standing workers.	54
	Leave	○	○	●	●	●	○	●	●	○	○	Limits on overtime hours worked.	Ensure that overtime hours do not exceed the limit of 80 hours for a three months period.	The factory is monitoring the overtime hours completed to prevent workers from exceeding the limit.	
	Overtime	●	●	●	○	○	○	○	○	○	○				
	Regular Hours	●	●	●	○	○	○	○	○	○	○				

Percentage of piece rate workers earning 300 (320 Gourdes as of May 2015) or more for eight hours of work (workers' average earnings):

Oct-13	Apr-14	Oct-14	Apr-15
9%	78%	54%	74%

One World Apparel S.A.

Location: Port-au-Prince
 Number of workers: 1448
 Date of registration: 27-Oct-09
 Date of last BW assessment: 14-Jan-15

- Factory was found non-compliant
- ◐ Factory was progressing
- No evidence of non-compliance

Advisory and Training Services

Activity	Date
21-Apr-15	Supervisory skills training
22-Apr-15	Supervisory skills training
23-Apr-15	Introduction to BW adjusted model - Review of Improvement plan
23-Apr-15	Supervisory skills training
29-Apr-15	Participation in an industry seminar on Better Work's revised service delivery model
7-May-15	Meeting with workers and union representatives concerning the set up of the PICC.
20-May-15	Workers PICC election. Advisory on Payment of overtime worked at night.
23-May-15	PICC Training
5-Jun-15	PICC Meeting
26-Jun-15	PICC Meeting
28-Aug-15	PICC Meeting
25-Sep-15	PICC Meeting

Compliance cluster	Compliance point	Assessment									Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9				
Child Labour	Child Labourers	○	○	○	○	○	○	○	○	○				
	Documentation and Protection of Young Workers	○	○	○	○	○	○	○	○	○				
	Hazardous Work	○	○	○	○	○	○	○	○	○				
	Unconditional Worst Forms	○	○	○	○	○	○	○	○	○				
Discrimination	Gender	○	○	○	○	○	○	○	○	○				
	Race and Origin	○	○	○	○	○	○	○	○	○				
	Religion and Political Opinion	○	○	○	○	○	○	○	○	○				
Forced Labour	Bonded Labour	○	○	○	○	○	○	○	○	○				
	Coercion	○	○	○	○	○	○	○	○	○				
	Forced Labour and Overtime	○	○	○	○	○	○	○	○	○				
	Prison Labour	○	○	○	○	○	○	○	○	○				
Freedom of Association and Collective Bargaining	Collective Bargaining	○	○	○	○	○	○	○	○	○				
	Interference and Discrimination	○	○	●	○	○	○	○	○	○				
	Strikes	○	○	○	○	○	○	○	○	○				
	Union Operations	○	○	●	○	○	○	○	○	○				
	Method of Payment	○	○	○	○	○	○	○	○	○				
	Minimum Wage	○	○	○	○	○	○	○	○	○				

Compliance cluster	Compliance point	Assessment									Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9				
Compensation	Overtime Wages	○	○	○	○	○	○	○	○	●	Payment for overtime worked at night.	Pay 100% above normal wage for all overtime hours worked at night.	The payroll system was adapted to consider overtime worked after 6 PM and to pay them 100% over normal wage.	
	Paid Leave	●	◐	○	○	●	●	○	●	○			The factory provides adequate payment for weekly rest days.	
	Premium Pay	○	○	○	○	○	○	○	○	○				
	Social Security and Other Benefits	●	◐	●	◐	●	●	◐	●	●	Employer contribution to ONA.	Pay employer contribution to ONA.		48
											Forwarding of workers' contributions for social insurance funds to ONA.	Forward of workers' contributions for social insurance funds to ONA.		
Contracts and Human Resources	Wage Information, Use and Deduction	●	○	○	○	○	○	○	○	○				
	Contracting Procedures	○	○	○	○	○	○	○	○	○				
	Dialogue, Discipline and Disputes	○	○	○	○	○	○	○	●	○			The factory ensures that disciplinary measures comply with the law.	
	Employment Contracts	○	●	●	●	○	○	○	○	○				
	Termination	○	○	●	○	○	○	○	○	○				
	Chemicals and Hazardous Substances	●	◐	●	◐	○	○	●	◐	○			The factory provides training for workers who work with chemicals and hazardous substances.	
													The factory ensures that the workplace is equipped with adequate firefighting equipment.	18
	Emergency Preparedness	●	◐	●	◐	○	◐	◐	●	◐	Marking or posting of emergency exits and/or escape routes in the workplace.	Mark or post emergency exits and/or escape routes in the workplace.		
											Periodic emergency drills.	Perform periodic emergency drills	The factory has started to perform emergency drills	

Compliance cluster	Compliance point	Assessment									Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9				
Occupational Safety and Health	Health Services and First Aid	●	●	●	◐	◐	◐	◐	●	●	Onsite medical facilities and staff. Pre-assignment and/or annual medical checks for workers.	Provide onsite medical facilities and staff as required by law. Provide pre-assignment and/or annual medical checks for workers.		48
	OSH Management Systems	●	◐	○	○	○	○	○	○	○				
	Welfare Facilities	●	◐	●	●	◐	●	●	●	●	Toilets.	Increase the number of toilets as required by law.		48
	Worker Accommodation	○	○	○	○	○	○	○	○	○				
											Workplace temperature	Reduce the workplace temperature		18
	Working Environment	●	○	○	●	○	●	◐	◐	◐	Workplace lighting.	Increase the workplace lighting.		
													The factory reduced the workplace noise levels.	

Compliance cluster	Compliance point	Assessment									Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9				
	Worker Protection	●	●	●	●	●	●	●	●	●	Installing guards on all dangerous moving parts of machines and equipment. Installing, grounding, and/or maintaining electrical wires, switches, and/or plugs. Training and encouragement of workers to use the personal protective equipment provided. Training to workers to use machines and equipment safely.	Install guards on all dangerous moving parts of machines and equipment. Ensure that all electrical wires, switches, and/or plugs are correctly installed, grounded, and/or maintained. Provide training to workers to use the personal protective equipment provided. Provide training for workers to use machines and equipment safely.	Training is provided to workers to ensure that personal protective equipment's are used properly. Training is provided to ensure that workers use machines and equipment safely. The factory provides fatigue mats or tables with footrest to standing workers. The factory provides all workers with personal protective clothing and equipment.	48
Working Time	Leave	○	○	○	○	○	○	○	○	○				
	Overtime	●	●	○	●	○	●	○	○	●	Limits on overtime hours worked	Comply with the limit of overtime hours worked set by the law	The factory has decrease the amount of overtime hours worked.	
	Regular Hours	●	●	○	○	○	○	○	○	○				

Percentage of piece rate workers earning 300 (320 Gourdes as of May 2015) or more for eight hours of work (workers' average earnings):

Oct-13	Apr-14	Oct-14	Apr-15
3%	72%	25%	25%

Pacific Sports S.A.

Location: Port-au-Prince
Number of workers: 1826
Date of registration: 11-Nov-09
Date of last BW assessment: 9-Jul-15

- Factory was found non-compliant
- ◐ Factory was progressing
- No-evidence of non-compliance

Advisory and Training Services

Date	Activity
06-Apr-15	Meeting with the Compliance team at their request regarding payment procedures at Pacific and possible corrective measures.
08-Apr-15	Meeting with the seniro management to present the Better work adjusted model and explain the need to implement the PICC.
21 to 23-Apr-15	Supervisory skills training.
29-Apr-15	Participation in an industry seminar on Better Work's revised service delivery model
21-May-15	Meeting with management to follow up on PICC establishment.
22-May-15	Management intro meeting on issues identified on last Better Work report and possible resolutions.
23-May-15	PICC Training.
15-Jun-15	Meeting with compliance manager regarding blockage for the establishment of the PICC.
25-Jun-15	Meeting with the compliance officer to discuss the mechanisms for the selection of workers'representatives for the PICC.
24-Jul-15	Meeting with Compliance Manager regarding upcoming PICC Meeting, training agenda for the year and compensation non compliance identified in the latest Better Work assessment report.
21-Aug-15	Management intro meeting on issues identified in the latest Better Work assessment report and possible resolutions.
28-Aug-15	PICC meeting with discussion on the compensation issues, OFATMA registration and excessive overtime.
18-Sep-15	Meeting with the HR manager to review and evaluate the current grievance mechanism system in the factory.

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Child Labour	Child Labourers	○	○	○	○	○	○	○	○	○	○	○				
	Documentation and Protection of	○	○	○	○	○	○	○	○	○	○	○				
	Young Workers	○	○	○	○	○	○	○	○	○	○	○				
	Hazardous Work	○	○	○	○	○	○	○	○	○	○	○				
	Unconditional Worst Forms	○	○	○	○	○	○	○	○	○	○	○				
Discrimination	Gender	●	○	○	○	○	○	○	○	○	○	○				
	Race and Origin	○	○	○	○	○	○	○	○	○	○	○				
	Religion and Political Opinion	○	○	○	○	○	○	○	○	○	○	○				
Forced Labour	Bonded Labour	○	○	○	○	○	○	○	○	○	○	○				
	Coercion	○	○	○	○	○	○	○	○	○	○	○				
	Forced Labour and Overtime	○	○	○	○	○	○	○	○	○	○	○				
	Prison Labour	○	○	○	○	○	○	○	○	○	○	○				
Freedom of Association and Collective Bargaining	Collective Bargaining	○	○	○	○	○	○	○	○	○	○	○				
	Interference and Discrimination	○	○	○	○	○	○	○	○	○	○	○				
	Strikes	○	○	○	●	○	○	○	○	○	○	○				

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Compensation	Union Operations	●	○	○	○	○	○	○	○	○	○	○				
	Method of Payment	○	○	○	○	○	○	○	○	○	○	○				
	Minimum Wage	○	○	○	○	○	○	○	○	○	○	○				
	Overtime Wages	●	○	○	○	○	○	○	○	○	●	◐	Payment for ordinary overtime.	Pay ordinary overtime correctly.	Payment for overtime hours worked on holidays is compliant with the law.	6
	Paid Leave	●	○	○	○	○	○	○	○	○	○	○				
	Premium Pay	○	○	○	○	○	○	○	○	○	●	○			Payment of regular hours worked on holidays is done correctly.	
													Employer contribution to ONA.	Pay employer contribution to ONA on time.		
													Collecting and forwarding workers' contributions for social insurance funds to ONA.	Collect and forwardg workers' contributions for social insurance funds to ONA on time.		
	Social Security and Other Benefits	○	●	○	●	○	○	○	○	○	●	○	Employer contribution to OFATMA for maternity and health insurance.	Register with OFATMA for maternity and health insurance and pay required employer contribution.		
													Forwarding of workers' contributions to OFATMA.	Register with OFATMA for maternity and health insurance and forward required workers contribution.		
Contracts and Human Resources	Wage Information, Use and Deduction	○	○	●	○	○	○	○	○	○	○	●	Payroll records	Keep one accurate payroll record.		
	Contracting Procedures	○	○	○	○	○	○	○	○	○	○	○				
	Dialogue, Discipline and Disputes	○	○	○	○	○	●	○	○	●	○	○				
	Employment Contracts	○	●	●	◐	○	○	○	○	○	○	○				
	Termination	●	○	○	●	○	●	○	●	○	●	○				

Compliance cluster	Compliance point	Assessment	Details of non-compliance	Improvement Priorities	Remediation Efforts	Months	
		1234567891011					
Occupational Safety and Health	Chemicals and Hazardous Substances		Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Display MSDS for all the chemicals used in the workplace.	Additional eye wash stations were added to the factory. The storage of the chemicals is adequate.	6	
			Labelling of chemicals and hazardous substances.	All chemicals used in the workplace need to be labelled.			
	Emergency Preparedness		Firefighting equipment.	Ensure that the factory has adequate firefighting equipment.	Factory has an adequate fire detection and alarm system. All emergency exits and escape routes are marked and posted. All sources of ignition are safeguarded.	18	
	Health Services and First Aid		Onsite medical facilities and staff.	Provide the required number of medical staff as per the law.		12	
	OSH Management Systems		Toilets.	Ensure that the number of toilets is compliant with the labor code.		60	
	Welfare Facilities				The workplace is clean and tidy.		
	Worker Accommodation						

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
	Working Environment												Workplace temperature.	Reduce workplace temperature.		48
													Workplace lighting.	Improve workplace lighting.		
	Worker Protection															
	Leave															
Working Time	Overtime												Limits on overtime hours worked.	Comply with the legal limits on overtime.		12
	Regular Hours															

Percentage of piece rate workers earning 300 (320 Gourdes as of May 2015) or more for eight hours of work (workers' average earnings):

Oct-13	Apr-14	Oct-14	Apr-15	Oct-15
5%	90%	52%	60%	84%

Palm Apparel S.A.

Location: Port-au-Prince
Number of workers: 1562
Date of registration: 17-Nov-09
Date of last BW assessment: 5-Aug-15

- Factory was found non-compliant
- ◐ Factory was progressing
- No-evidence of non-compliance

Advisory and Training

Date	Activity
06-Mar-15	Meeting with Compliance and HR Managers to discuss the implementation of the PICC.
24-Apr-15	Meeting with the HR manager on efforts made regarding the improvement plan.
29-Apr-15	Participation in an industry seminar on Better Work's revised service delivery model
13-May-15	PICC establishment preparation with management.
20-May-15	Meeting with management on the self diagnosis tool and the Better Work adjusted model.
	PICC establishment preparation / Workers awareness (Thor)
22-May-15	PICC establishment preparation/ Workers awareness (Diquini)
22-Jun-15	Factory tour
	Review of payroll documents.
	Meeting with the management to follow up on the establishment of the PICC and plan the relevant trainings.
25-Jun-15	Meeting with workers regarding upcoming trainings.
29-Jun-16	PICC Training.
04-Sep-15	PICC Meeting.

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Child Labour	Child Labourers	○	○	○	○	○	○	○	○	○	○	○				
	Documentation and Protection of Young Workers	○	○	○	○	○	○	○	○	○	○	○				
	Hazardous Work	○	○	○	○	○	○	○	○	○	○	○				
	Unconditional Worst Forms	○	○	○	○	○	○	○	○	○	○	○				
Discrimination	Gender	○	○	○	●	○	○	○	○	○	○	○				
	Race and Origin	○	○	○	○	○	○	○	○	○	○	○				
	Religion and Political Opinion	○	○	○	○	○	○	○	○	○	○	○				
Forced Labour	Bonded Labour	○	○	○	○	○	○	○	○	○	○	○				
	Coercion	○	○	○	○	○	○	○	○	○	○	○				
	Forced Labour and Overtime	○	○	○	○	○	○	○	○	○	○	○				
	Prison Labour	○	○	○	○	○	○	○	○	○	○	○				
Freedom of Association and Collective Bargaining	Collective Bargaining	○	○	○	○	○	○	○	○	○	○	○				
	Interference and Discrimination	○	○	○	○	○	○	○	○	○	○	○				
	Strikes	○	○	○	○	○	○	○	○	○	○	○				

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Compensation	Union Operations	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Method of Payment	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Minimum Wage	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Overtime Wages	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☒	Payment for overtime hours worked on holidays.	Payment of overtime worked on holidays must comply with the law.		
	Paid Leave	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☒	Payment for sick leave. Payment for maternity leave.	Payment for sick leave must comply with the law. Payment for maternity leave must comply with the law.		
	Premium Pay	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
															Employer contribution was sent to ONA on time.	6
															Workers contribution to ONA were sent on time.	
	Social Security and Other Benefits	☒	☒	☒	☒	☐	☒	☐	☐	☐	☒	☒	Employer contribution to OFATMA for maternity and health insurance. Forwarding of workers' contributions to OFATMA.	Employer must finalize its affiliation to OFATMA health and maternity insurance. Employer must finalize its affiliation to OFATMA health and maternity insurance.		
	Wage Information, Use and Deduction	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
Contracts and Human Resources	Contracting Procedures	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Dialogue, Discipline and Disputes	☐	☐	☐	☒	☒	☐	☐	☐	☐	☐	☐				
	Employment Contracts	☒	☒	☒	☒	☐	☐	☐	☐	☒	☐	☐				
	Termination	☐	☒	☐	☐	☐	☐	☐	☐	☒	☐	☐				
	Chemicals and Hazardous Substances	☒	☒	☒	☒	☒	☒	☒	☒	☒	☐	☐				

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Occupational Safety and Health	Emergency Preparedness	●	◐	◐	●	◐	○	●	◐	◐	○	○				
													Onsite medical facilities and staff.	Provide required onsite medical facilities and staff.		60
	Health Services and First Aid	●	●	◐	●	◐	◐	◐	◐	◐	◐	◐	Pre-assignment and/or annual medical checks for workers.	Provide pre-assignment medical checks for all newly hired workers.	The factory has a contract with a doctor who is in charge of providing medical checks for all newly hired workers.	
	OSH Management Systems	●	◐	◐	●	◐	○	○	○	○	●	○				
													Toilets.	Provide the number of toilets required by the Haitian Labor code.		60
	Welfare Facilities	●	●	◐	●	●	●	◐	●	●	●	●	Eating area.	Improve the existing eating areas to accommodate more workers.		
	Worker Accommodation	○	○	○	○	○	○	○	○	○	○	○				
															Noise levels are compliant with the recommended limits.	24
	Working Environment	●	○	○	●	●	○	●	◐	●	◐	◐	Workplace temperature and/or ventilation	The temperature in the workplace needs to be reduced to be compliant		
													Workplace lighting.	Adjust the light level in the workplace.		
	Worker Protection	●	◐	◐	●	◐	◐	●	◐	◐	○	●	Providing workers with personal protective clothing and equipment.	Provide workers with PPE when necessary.		

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Working Time	Leave	☐	☐	☒	☒	☒	☐	☐	☒	☐	☐	☐				
	Overtime	☒	☒	☐	☒	☒	☐	☐	☐	☐	☒	☐			The factory requested authorization from MAST to work overtime.	
	Regular Hours	☒	☒	☒	☒	☒	☒	☐	☐	☐	☒	☐			The factory requested authorization from MAST to work on Sundays.	
															The working time records are accurate.	

Percentage of piece rate workers earning 300 (320 Gourdes as of May 2015) or more for eight hours of work (workers’ average earnings):

Oct-13	Apr-14	Oct-14	Apr-15	Oct-15
49%	68%	31%	62%	91%

Premium Apparel S.A.

Location: Port-au-Prince
 Number of workers: 2016
 Date of registration: 28-Oct-09
 Date of last BW assessment: 13-Oct-14

- Factory was found non-compliant
- ◐ Factory was progressing
- No evidence of non-compliance

Advisory and Training Services

Date	Activity
07-Apr-15	Advisory on noise level and Freedom of Association policy.
29-Apr-15	Participation in an industry seminar on Better Work's revised service delivery model
20-May-15	Advisory on payment of overtime worked at night, limits on over time hours worked and working time records.
07-Jul-15	Negotiation skills training
08-Jul-15	Negotiation skills training
21-Jul-15	Negotiation skills training
21-Jul-15	Advisory on payment of production salary. Set up and demonstration of the use of the self diagnostic tool.
22-Jul-15	Negotiation skills training.
07-Aug-15	Advisory on self-diagnosis and discussion with union representatives on the formation of the PICC.
27-Aug-15	PICC Training.
04-Sep-15	Meeting with the unions on the set up of the PICC and advisory on the use of the self diagnosis tool.
11-Sep-15	Second meeting with the unions on the formation of the PICC.

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
Child Labour	Child Labourers	○	○	○	○	○	○	○	○	○	○				
	Documentation and Protection of Young Workers	○	○	○	○	○	○	○	○	○	○				
	Hazardous Work	○	○	○	○	○	○	○	○	○	○				
	Unconditional Worst Forms	○	○	○	○	○	○	○	○	○	○				
Discrimination	Gender	●	○	○	○	○	○	○	◐	○	○				
	Race and Origin	○	○	○	○	○	○	○	○	○	○				
	Religion and Political Opinion	●	○	○	○	○	○	○	○	○	○				
Forced Labour	Bonded Labour	○	○	○	○	○	○	○	○	○	○				
	Coercion	○	○	○	○	○	○	○	○	○	○				
	Forced Labour and Overtime	○	○	○	○	○	○	○	○	○	○				
	Prison Labour	○	○	○	○	○	○	○	○	○	○				
Freedom of Association and Collective Bargaining	Collective Bargaining	○	○	○	○	○	○	○	○	○	○				
	Interference and Discrimination	○	○	○	○	○	○	○	○	○	○				
	Strikes	○	○	○	○	○	○	○	○	○	○				
	Union Operations	○	○	○	○	○	○	○	○	○	○				
	Method of Payment	○	○	○	○	○	○	○	○	○	○				

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months		
		1	2	3	4	5	6	7	8	9	10						
Compensation	Minimum Wage																
	Overtime Wages													Payment for overtime worked at night.	Pay overtime worked at night as required by law.	Payroll system was adapted to take overtime hours after 6 PM into consideration.	
	Paid Leave																
	Premium Pay																
	Social Security and Other Benefits															The factory collects workers' contribution to ONA for social insurance funds.	
	Wage Information, Use and Deduction													Payroll records.	Keep one complete and accurate payroll records for all workers		
Contracts and Human Resources	Contracting Procedures																
	Dialogue, Discipline and Disputes													Disciplinary measures.	Implement disciplinary measures that are compliant with the factory internal work rules.		
	Employment Contracts																
	Termination																
Occupational Safety and Health	Chemicals and Hazardous Substances																
	Emergency Preparedness																
													Onsite medical facilities and staff.	Provide onsite medical facilities and staff as required by the law.		54	
	Health Services and First Aid													Pre-assignment and/or annual medical checks for workers.	Provide pre-assignment and/or annual medical checks for workers.	OFATMA has started to provide medical checks to workers. The factory is also using Bernard Mevs Hospital for the medical checks.	
												First-aid training for workers.	Train 10 percent of the workforce in first-aid.				

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months	
		1	2	3	4	5	6	7	8	9	10					
	OSH Management Systems														The factory records and submits work related accidents and diseases to OFATMA on a monthly basis.	
	Welfare Facilities												Toilets.	Increase the number of toilets as required by law.		54
	Worker Accommodation															
	Working Environment															The factory reduced workplace noise levels.
	Worker Protection															
Working Time	Leave												Time off for breastfeeding breaks.	Provide time off for breastfeeding breaks to all eligible workers.	The factory has created a form to ensure that all nursing women are aware of their entitlement for the breastfeeding break.	6
	Overtime												Limits on overtime hours worked	Comply with limits on overtime hours worked set by the law.		
	Regular Hours												Working time records.	Keep complete and accurate time records for all workers.		

Percentage of piece rate workers earning 300 (320 Gourdes as of May 2015) or more for eight hours of work (workers' average earnings):

Oct-13	Apr-14	Oct-14	Apr-15
25%	17%	37%	37%

Quality Sewing Manufacturing S.A.

Location: Port-au-Prince
 Number of workers: 417
 Date of registration: 1-Oct-09
 Date of last BW assessment: 23-Jun-15

- Factory was found non-compliant
- ◐ Factory was progressing
- No evidence of non-compliance

Advisory and Training Services

16-Apr-15 Introduction to BW new service delivery model and advisory on payment of overtime and disciplinary measures
 21-Apr-15 PICC training
 29-Apr-15 Participation in an industry seminar on Better Work's revised service delivery model
 21-May-15 Meeting about the set up of the PICC with the Union in the factory and advisory on Internal work rules.
 15-Jun-15 PICC training
 26-Jun-15 Advisory on Internal work rules and temporary workers contracts. Advisory on the use of chemical in the workplace.
 21-Jul-15 Advisory on payment of weekly rest day. Advisory on the set up and use of the self diagnosis tool
 23-Sep-15 Meeting with management to present the self diagnosis process introduce OSH management systems and Follow up on the improvement plan.

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Child Labour	Child Labourers	○	○	○	○	○	○	○	○	○	○	○				
	Documentation and Protection of Young Workers	○	○	○	○	○	○	○	○	○	○	○				
	Hazardous Work	○	○	○	○	○	○	○	○	○	○	○				
	Unconditional Worst Forms	○	○	○	○	○	○	○	○	○	○	○				
Discrimination	Gender	●	●	○	○	○	○	○	●	○	○	○				
	Race and Origin	○	○	○	○	○	○	○	○	○	○	○				
	Religion and Political Opinion	●	●	○	○	○	○	○	●	○	○	○				
Forced Labour	Bonded Labour	○	○	○	○	○	○	○	○	○	○	○				
	Coercion	○	○	○	○	○	○	○	○	○	○	○				
	Forced Labour and Overtime	○	○	○	●	○	○	○	○	○	○	○				
	Prison Labour	○	○	○	○	○	○	○	○	○	○	○				
Freedom of Association and Collective Bargaining	Collective Bargaining	○	○	○	○	○	○	○	○	○	○	○				
	Interference and Discrimination	○	○	○	○	○	○	○	○	○	○	○				
	Strikes	○	○	○	○	○	○	○	○	○	○	○				
	Union Operations	○	○	○	○	○	○	○	○	○	○	○				
	Method of Payment	○	○	○	○	○	○	○	○	○	○	○				

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Compensation	Minimum Wage												Payment of minimum wage for full time workers.	Pay at least minimum wage to all full time workers.	The factory pays at least minimum wage to temporary workers.	6
															The factory pays at least minimum wage to apprentices.	
	Overtime Wages												Payment for ordinary overtime.	Pay all workers 50% above normal wage for ordinary overtime worked.		6
	Paid Leave												Payment for weekly rest days.	Pay workers correctly for weekly rest days.		
	Premium Pay															
	Social Security and Other Benefits												Employer contribution to OFATMA for maternity and health insurance.	Enroll to OFATMA maternity and Health Insurance, collect and forward workers' contribution to OFATMA		
	Wage Information, Use and Deduction												Payroll records.	Keep one accurate payroll record.		42
													Deductions from workers' wages.	Make only authorized and legal deductions from worker's wages.		
	Contracting Procedures															
	Dialogue, Discipline and Disputes														The factory is ensuring that disciplinary measures comply with legal requirements.	

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Contracts and Human Resources	Employment Contracts														The factory specifies terms and conditions of employment in all employees' contracts.	6
															The factory provides contracts for all workers including temporary workers and apprentices.	
														Employment contract's compliance with the labor code, collective agreement and/or internal work rules	Ensure that apprentices' contracts are approved by MAST and that they are align with the internal work rules of the factory in terms of payment.	The factory has developed internal work rules which are approved by MAST.
	Termination														The factory is terminating workers for valid reason and reasons for termination are included in all terminated workers files.	
Chemicals and Hazardous Substances													Labelling of chemicals and hazardous substances.	Label all chemicals and hazardous substances.		54
													Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Display chemical safety data sheets for all chemicals and hazardous substances in the workplace.		
														Washing facilities or cleaning materials in the event of chemical exposure.	Provide washing facilities or cleaning materials in the event of chemical exposure	

Compliance cluster	Compliance point	Assessment	Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1 2 3 4 5 6 7 8 9 10 11				
Occupational Safety and Health	Emergency Preparedness		Fire detection and alarm system.	Install adequate fire detection and alarm system.		60
			Marking or posting of emergency exits and/or escape routes in the workplace.	Mark or post all emergency exits and/or escape routes in the workplace.		
			Fire fighting equipment	Ensure that all firefighting equipment's are maintained properly.		
			Training workers to use the firefighting equipment.	Provide firefighting training to at least 10% of workers.		
			Periodic Emergency drills	Ensure that the factory realizes periodic emergency drills.		
	Health Services and First Aid		Onsite medical facilities and staff.	Provide onsite medical facilities and staff as required by the law.		60
			Health checks for workers who are exposed to work-related hazards.	Provide health checks for workers who are exposed to work-related hazards.		
			First aid training for workers.	Provide first aid training to at least 10% of the workers.		
					The factory provided pre-assignment and/or annual medical checks to workers.	

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
													Assessment of general occupational safety and health issues in the factory.	Conduct an assessment of general occupational safety and health issues in the factory on a regular basis.		30
	OSH Management Systems	●	●	●	●	○	●	●	●	●	●	●	Mechanisms to ensure cooperation between workers and management on OSH matters.	Ensure that the factory has a functioning OSH committee.		
	Welfare Facilities	●	●	●	●	●	●	●	●	●	●	●	Toilets.	Increase the number of toilets as required by law.		60
	Worker Accommodation	○	○	○	○	○	○	○	○	○	○	○				
	Working Environment	○	○	○	○	●	○	●	●	●	●	●	Workplace lighting.	Improve lighting in the workplace.		24
													Installing, grounding, and/or maintaining electrical wires, switches, and/or plugs.	Install, ground, and/or maintain electrical wires, switches, and/or plugs.		60
	Worker Protection	●	●	●	●	●	●	●	●	●	●	●	Installing guards on all dangerous moving parts of machines and equipment.	Install guards on all dangerous moving parts of machines and equipment.		
													Providing workers with personal protective clothing and equipment.	Provide workers with personal protective clothing and equipment.		
	Leave	○	○	●	●	○	○	○	○	○	○	○			The factory provides breast feeding break to all eligible workers.	
	Overtime	●	●	●	●	○	●	○	●	○	●	●	Limits on overtime hours worked	Comply with the limit of overtime hours worked set by the law.		60
Working Time													Authorization from the Department of Labor for overtime.	Request authorization from the Department of Labor to work overtime.		

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
	Regular Hours												The factory complies with the legal requirements on the daily break period.			6

S & H Global S.A.

Location: Port-au-Prince
 Number of workers: 6506
 Date of registration: 19-Jun-12
 Date of last BW assessment: 1-Dec-14

- Factory was found non-compliant.
- ◐ Factory was progressing
- No-evidence of non-compliance.

Advisory and Training Services

Date	Activity
7-May-15	Participation in an industry seminar on Better Work's revised service delivery model
30-May-15	Workplace Communication training.
31-May-15	Supervisory Skills Training.
01-Jun-15	HIV AIDS training.
02-Jun-15	PICC Training. Factory tour and shadow by the compliance team
03-Jun-15	Meeting with the HR managers on compensation procedures. PICC meeting
30-Jun-15	Training session with Compliance team on CAT (OSH only). Training session with HR Team on CAT (HR and contracts only). PICC meeting
	Discussion on paid leave and termination issues.
03-Jul-15	Supervisory Skills Training.
13-Aug-15	Introduction to the self diagnosis tool with compliance team. Discussion with unions.

Compliance cluster	Compliance point	Assessment						Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6				
Child Labour	Child Labourers	○	○	○	○	○	○				
	Documentation and Protection of Young Workers	○	○	○	○	○	○				
	Hazardous Work	○	○	○	○	○	○				
	Unconditional Worst Forms	○	○	○	○	○	○				
Discrimination								Sexual harassment.	Ensure that the necessary steps are taken in order to eliminate sexual harassment of workers in the workplace.		
		○	○	○	○	○	●				
	Gender										
	Race and Origin	○	○	○	○	○	○				
	Religion and Political Opinion	○	○	○	○	○	○				
Forced Labour	Bonded Labour	○	○	○	○	○	○				
	Coercion	○	○	○	○	○	○				
	Forced Labour and Overtime	○	○	○	○	○	○				
	Prison Labour	○	○	○	○	○	○				
Freedom of Association and Collective Bargaining	Collective Bargaining	○	○	○	○	○	○				
	Interference and Discrimination	○	○	○	○	○	○				
	Strikes	○	○	○	○	○	○				
	Union Operations	○	○	○	○	○	○				
	Method of Payment	○	○	○	○	○	○				

Compliance cluster	Compliance point	Assessment						Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6				
Compensation	Minimum Wage	☐	☐	☐	☐	☐	☐				
	Overtime Wages	☐	☐	☐	☐	☐	☐	Payment for sick leave.	Ensure that payment for sick leave is compliant with the law.		
	Paid Leave	☐	☐	☒	☐	☐	☒	Payment for maternity leave.	Ensure that payment for maternity leave is compliant with the law.		
	Premium Pay	☐	☐	☒	☐	☐	☐	Employer contribution to OFATMA for maternity and health insurance.	Ensure that the factory is affiliated with the health and maternity insurance from OFATMA.		
	Social Security and Other Benefits	☒	☐	☐	☐	☐	☒	Forwarding of workers' contributions to OFATMA.	Ensure that the factory is affiliated with the health and maternity insurance from OFATMA.		
	Wage Information, Use and Deduction	☐	☐	☐	☒	☐	☐				
	Contracting Procedures	☐	☐	☐	☐	☐	☐	Bullying, harassment or humiliating treatment of workers.	Ensure that workers are not subject to bullying, harassment or humiliating treatments.		
	Dialogue, Discipline and Disputes	☒	☐	☐	☒	☐	☒				
	Employment Contracts	☐	☐	☐	☐	☐	☒	Notice of termination.	Provide or pay the proper notice of termination to workers.		
	Termination	☒	☐	☐	☐	☐	☒	Payment for unused paid annual leave upon resignation or termination.	Ensure that workers are paid correctly for any unused annual leave upon termination or resignation.		
Contracts and Human Resources								Annual salary supplement or bonus upon termination.	Ensure that annual salary supplement or bonus is paid correctly upon termination.		

Compliance cluster	Compliance point	Assessment						Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6				
Occupational Safety and Health	Chemicals and Hazardous Substances	●	○	○	●	◐	◐	Washing facilities or cleansing materials in the event of chemical exposure.	Set up an eye wash station in the warehouse where chemicals are stored.	A system has been implemented to ensure the labelling of all chemicals.	12
										The exposure of workers to hazardous substances has been limited and prevented.	
										all chemicals have been stored properly.	
	Emergency Preparedness	○	○	●	◐	◐	○			All sources of ignition are safeguarded.	0
										The proper fire detection and alarm systems have been installed.	
	Health Services and First Aid	●	◐	●	◐	◐	◐	Pre-assignment and/or annual medical checks for workers.	Provided free pre-assignment and annual health checks for workers.	The factory is compliant with its current medical staff and facilities.	30
								Health checks for workers who are exposed to work-related hazards.	Provide health check to workers who are exposed to work related hazards.	There are sufficient and accessible first aid boxes in the workplace.	
OSH Management Systems	●	○	○	●	○	○					
Welfare Facilities	○	●	◐	●	○	○					
Worker Accommodation	○	○	○	○	○	○					

Compliance cluster	Compliance point	Assessment						Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6				
	Working Environment	☐	☐	☒	☒	☒	☐	Workplace noise levels.	Ensure that noise levels are acceptable.		18
								Workplace temperature and/or ventilation.	Ensure that workplace temperature is acceptable.		
	Worker Protection	☐	☐	☒	☒	☐	☐				
	Leave	☐	☐	☒	☐	☐	☐				
Working Time								Limits on overtime hours worked.	Limit overtime work to 80 hours in 3 months.		
	Overtime	☒	☐	☐	☐	☐	☐	Authorization from the Department of Labour for overtime.	Request authorization from MAST for overtime work.		
	Regular Hours	☐	☐	☐	☐	☐	☐				

Percentage of piece rate workers earning 300 (320 Gourdes as of May 2015) or more for eight hours of work (workers' average earnings):

Oct-13	Apr-14	Oct-14		Apr-15	Oct-15
5%	0%	7%		10%	13%

Sewing International S.A.

Location: Port-au-Prince
 Number of workers: 1905
 Date of registration: 25-Sep-09
 Date of last BW assessment: 16-Jun-15

- Factory was found non-compliant
- ◐ Factory was progressing
- No evidence of non-compliance

Advisory and Training Services

Date	Activity
3-Mar-15	Discussion on training needs and training plan for the factory. Factory tour with compliance manager.
21-Apr-15	Supervisory skills training
22-Apr-15	Supervisory skills training
23-Apr-15	Supervisory skills training
29-Apr-15	Participation in an industry seminar on Better Work's revised service delivery model
7-May-15	Meeting with the unions in the factory and Management about the set up of the PICC.
15-Jul-15	Supervisory skills training
16-Jul-15	Supervisory skills training
17-Jul-15	Supervisory skills training
21-Jul-15	Negotiation skills training
22-Jul-15	Negotiation skills training
12-Aug-15	Management intro meeting. Advisory on PPE for people using chemicals in the factory. Advisory on the set up and use of the self-diagnosis tool.
23-Sep-15	Meeting with management to present the self diagnosis process introduce OSH management systems and Follow up on the improvement plan.

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Child Labour	Child Labourers	○	○	○	○	○	○	○	○	○	○	○				
	Documentation and Protection of Young Workers	○	○	○	○	○	○	○	○	○	○	○				
	Hazardous Work	○	○	○	○	○	○	○	○	○	○	○				
	Unconditional Worst Forms	○	○	○	○	○	○	○	○	○	○	○				
Discrimination	Gender	○	○	○	○	○	○	○	○	○	○	○				
	Race and Origin	○	○	○	○	○	○	○	○	○	○	○				
	Religion and Political Opinion	○	○	○	○	○	○	○	○	○	○	○				
Forced Labour	Bonded Labour	○	○	○	○	○	○	○	○	○	○	○				
	Coercion	○	○	○	○	○	○	○	○	○	○	○				
	Forced Labour and Overtime	○	○	○	○	○	○	○	○	○	○	○				
	Prison Labour	○	○	○	○	○	○	○	○	○	○	○				
Freedom of Association and Collective Bargaining	Collective Bargaining	○	○	○	○	○	○	○	○	○	○	○				
	Interference and Discrimination	●	○	○	○	○	○	○	○	○	○	○				
	Strikes	○	○	●	●	●	●	○	○	○	○	○				
	Union Operations	○	○	○	○	○	○	○	○	○	○	○				
	Method of Payment	○	○	○	○	○	○	○	○	○	○	○				
	Minimum Wage	○	○	○	○	○	○	○	○	○	○	○				

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Compensation	Overtime Wages	○	○	○	○	○	○	○	○	○	○	○				
	Paid Leave	●	◐	○	○	○	○	○	○	○	○	○				
	Premium Pay	○	○	○	○	○	○	○	○	○	○	○				
													Employer contribution to ONA.	Forward employer's contribution to ONA.		
													Collecting and forwarding workers' contributions for social insurance funds to ONA.	Collect and forward workers' contribution for social insurance funds to ONA.		
Compensation	Social Security and Other Benefits	●	◐	○	●	○	●	◐	○	○	○	●	Employer contribution to OFATMA for maternity and health insurance.	Enroll to OFATMA maternity and Health Insurance and forward employer's contribution to OFATMA.		
													Forwarding of workers' contributions to OFATMA.	Collect and forward workers' contribution to OFATMA.		
Contracts and Human Resources	Wage Information, Use and Deduction	●	●	○	●	○	○	◐	●	●	○	○				
	Contracting Procedures	○	○	○	○	○	○	○	○	○	○	○				
	Dialogue, Discipline and Disputes	○	○	○	○	○	●	○	○	○	○	○				
	Employment Contracts	●	◐	◐	●	●	○	○	○	○	○	○				
	Termination	○	○	○	●	○	○	○	○	○	○	○			The factory includes reasons for termination in all terminated workers' files.	
	Chemicals and Hazardous Substances	●	●	○	●	○	◐	◐	○	○	○	○				
	Emergency Preparedness	●	●	◐	●	◐	◐	◐	◐	◐	◐	◐	Accessible, unobstructed, and/or unlocked emergency exits during working hours, including overtime.	Ensure that all escape routes are clear during working hours.		

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Occupational Safety and Health	Health Services and First Aid	●	●	●	●	●	●	●	●	●	●	●	Onsite medical facilities and staff.	Provide onsite medical facilities and staff as required by law.		60
													Pre-assignment and/or annual medical checks for workers.	Provide pre-assignment and/or annual medical checks for workers.		
	OSH Management Systems	●	●	○	●	○	○	○	○	○	○	○				
	Welfare Facilities	●	●	●	●	●	●	●	●	●	●	●	Toilets.	Increase the number of toilets as required by law.		60
	Worker Accommodation	○	○	○	○	○	○	○	○	○	○	○				
	Working Environment	○	○	○	●	○	○	●	●	●	●	●	Workplace temperature.	Reduce workplace temperature.		24
													Workplace lighting.	Increase workplace lighting.		
	Worker Protection	●	●	●	●	●	●	●	●	●	●	●	Providing workers with personal protective clothing and equipment.	Ensure that all relevant workers have adequate personal protective clothing and equipment.		60
													Chairs with backrests.	Provide chairs with backrests for all workers.		
													Installing guards on all dangerous moving parts of machines and equipment.	Install guards on all dangerous moving parts of machines and equipment.		
															The factory trained and encouraged workers to use personal protective equipment provided.	
Working Time	Leave	○	○	●	●	●	○	○	○	○	○	○				
	Overtime	●	●	●	●	●	○	●	○	○	○	○				
	Regular Hours	●	●	●	●	○	●	●	○	○	○	○				

Percentage of piece rate workers earning 300 (320 Gourdes as of May 2015) or more for eight hours of work (workers' average earnings):

Apr-14	Oct-14	Apr-15	Oct-15
54%	45%	45%	60%

Val d'Or Apparel Mfg S.A.

Location: Port-au-Prince
Number of workers: 1178
Date of registration: 24-Sep-14
Date of last BW assessment: 27-Jan-15

- Factory was found non-compliant
- ◐ Factory was progressing
- No-evidence of non-compliance

Advisory and Training Services

Date	Activity
4-Mar-15	Management intro meeting. Advisory on Payment of annual leave and payment of ONA Advisory on payroll records.
9-Apr-15	Advisory on BW new Service delivery model. Advisory on emergency preparedness. Factory tour.
22-Apr-15	Information session on PICC set up and functions for the workers. PICC members candidates registration.
29-Apr-15	Participation in an industry seminar on Better Work's revised service delivery model
14-May-15	PICC election for workers
23-May-15	PICC Training
23-Jun-15 to 25-Jun-15	Supervisory skills training
3-Jul-15	PICC Training
23-Jul-15	PICC meeting
20-Aug-15	PICC meeting
2-Sep-15	Advisory on accuracy of payroll records -Advisory on implementation of a cantine base on salary deduction.
17-Sep-15	Restructuration of the PICC - Advisory on grievance mechanisms.

Compliance cluster	Compliance point	Assessment	Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1				
Child Labour	Child Labourers	○				
	Documentation and Protection of Young	○				
	Hazardous Work	○				
	Unconditional Worst Forms	○				
Discrimination	Gender	○				
	Race and Origin	○				
	Religion and Political Opinion	○				
Forced Labour	Bonded Labour	○				
	Coercion	○				
	Forced Labour and Overtime	○				
	Prison Labour	○				
	Collective Bargaining	○				

Compliance cluster	Compliance point	Assessment	Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1				
Freedom of Association and Collective Bargaining	Interference and Discrimination	☐				
	Strikes	☐				
	Union Operations	☐				
	Method of Payment	☐				
	Minimum Wage	☐				
	Overtime Wages	☐				
			Payment for annual leave	Ensure that all payments made to workers are included in the calculation of the annual leave payment.	All payments made to workers are now recorded in the payroll.	
	Paid Leave	☒				
Compensation	Premium Pay	☐				
			Payment of annual salary supplement or Bonus	Ensure that all payment made to workers are included in the calculation of the annual salary supplement or bonus.	All payments made to workers are now recorded in the payroll.	
	Social Security and Other Benefits	☒				
	Wage Information, Use and Deduction	☒	Payroll records	Keep one accurate payroll records	All payments made to workers are now recorded in the payroll.	
	Contracting Procedures	☐				
	Dialogue, Discipline and Disputes	☐				
	Employment Contracts	☐				

Compliance cluster	Compliance point	Assessment	Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
1						
Contracts and Human Resources	Termination	●	Reasons for termination.	Ensure that the factory is terminating workers for valid reasons and that reasons for termination are included in all terminated workers files.	The factory is now including reason for termination in all terminated workers' files.	
			Payment for unused paid annual leave upon resignation or termination.	Include payment for unused annual leave in the calculation of the severance pay for all terminated or resigned workers.	Payment for unused paid annual leave is included in severance pay.	
			Annual salary supplement or bonus upon termination.	Includes payment for accumulated salary supplement or bonus in severance pay for all terminated or resigned workers' files.	Payment for portion of annual salary supplement or bonus is included in severance pay.	
Chemicals and Hazardous Substances		○				
Emergency Preparedness		●	Training workers to use the firefighting equipment.	Train at least 10% of the workers in firefighting.		
			Firefighting equipment	Ensure that all fire-fighting equipments are available and functioning.		

Compliance cluster	Compliance point	Assessment	Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1				
Occupational Safety and Health	Health Services and First Aid	●	Onsite medical facilities and staff.	Comply with the number of medical staff required by the law.		
			Pre-assignment and/or annual medical checks for workers.	Provide pre-assignment and/or annual medical checks for workers.		
			First aid training for workers.	Train at least 10% of the workers in first aid.		
	OSH Management Systems	○				
	Welfare Facilities	○				
	Worker Accommodation	○				
Working Time	Working Environment	●	Workplace lighting	Increase the lighting in the workplace.		
	Worker Protection	○				
	Leave	○				
	Overtime	○				
	Regular Hours	○				

Percentage of piece rate workers earning 300 (320 Gourdes as of May 2015) or more for eight hours of work (workers' average earnings):

Apr-15
0%

The Willbes Haitian II S.A.

Location: Port-au-Prince
Number of workers: 1250
Date of registration: 27-Aug-10
Date of last BW assessment: 14-Jul-15

- Factory was found non-compliant.
- ◐ Factory was progressing
- Factory was compliant.

Advisory and Training Services

Date	Activity
27-Feb-15	Advisory visit on the improvement progress of the factory.
5-Mar-15	Meeting with compliance manager to discuss the establishment of a PICC.
21-Apr-15	Supervisory Skills Training.
22-Apr-15	Follow up visit with management to review progress on improvements.
29-Apr-15	Participation in an industry seminar on Better Work's revised service delivery model
20-May-15	Introduction of BWH revised service model and initialization of self diagnosis process.
22-Jun-15	Meeting with compliance team to finalize the establishment of the PICC.
30-Jul-15	Information session with HR and accounting staff on compensation issues.
10-Aug-15	Meeting with compliance team to clarify payment terms for holiday pay.

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
Child Labour	Child Labourers	○	○	○	○	○	○	○	○	○	○				
	Documentation and Protection of Young Workers	○	○	○	○	○	○	○	○	○	○				
	Hazardous Work	○	○	○	○	○	○	○	○	○	○				
	Unconditional Worst Forms	○	○	○	○	○	○	○	○	○	○				
Discrimination	Gender	○	○	○	○	○	○	○	○	○	○				
	Race and Origin	○	○	○	○	○	○	○	○	○	○				
	Religion and Political Opinion	○	○	○	○	○	○	○	○	○	○				
Forced Labour	Bonded Labour	○	○	○	○	○	○	○	○	○	○				
	Coercion	●	○	○	○	○	○	○	○	○	○				
	Forced Labour and Overtime	○	○	○	○	○	○	○	○	○	○				
	Prison Labour	○	○	○	○	○	○	○	○	○	○				
Freedom of Association and Collective Bargaining	Collective Bargaining	○	○	○	○	○	○	○	○	○	○				
	Interference and Discrimination	○	○	○	○	○	○	○	○	○	○				
	Strikes	○	○	○	○	○	○	○	○	○	○				
	Union Operations	○	○	○	○	○	○	○	○	○	○				
	Method of Payment	○	○	○	○	○	○	○	○	○	○				
	Minimum Wage	○	○	○	○	○	○	○	○	○	○				
	Overtime Wages	○	○	○	○	○	○	○	○	○	●		The factory has adjusted the payment system to accurately compensate overtime hours.		

Compensation	Paid Leave		Payment for annual leave.	All wages earned must be included in the calculation for the annual leave payment.	6
			Payment for sick leave.	Payment for sick leave must be paid based on average salary earned.	
			Payment for maternity leave.	Payment for maternity leave must be paid based on average salary earned.	
	Premium Pay		Payment for regular working hours worked on weekly rest days	Pay correctly for regular hours worked on weekly rest days	6
				No workers have been found to be paid incorrectly for holiday work.	
	Social Security and Other Benefits		Employer contribution to OFATMA for maternity and health insurance.	Register all workers to OFATMA for maternity and health insurance and make necessary contribution.	6
			Forwarding of workers' contributions to OFATMA.	Collect and forward workers contribution for maternity and health insurance to OFATMA	
			Payment of annual salary supplement or bonus.	Ensure that payment of annual salary supplement or bonus is accurate.	
				Payment of employers' contribution to ONA has been made on time.	
				Payment of workers' contribution to ONA has been made on time.	
Wage Information, Use and Deduction		Payroll records.	All wages and compensation must be recorded in the main payroll record.	6	
Contracting Procedures					
Dialogue, Discipline and Disputes					
Contracts and Human Resources	Employment Contracts		Internal work rules.	The factory must revise the Internal work rules to ensure all articles comply with law requirements.	
			Notice of termination.	The factory must ensure that calculation for compensation for notice included all wages for the qualified period.	
Termination					

				Labelling of chemicals and hazardous substances.	Label all chemicals and hazardous substances used in the workplace.	12
Chemicals and Hazardous Substances				Washing facilities or cleansing materials in the event of chemical exposure.	Install eye wash stations in all areas where chemicals are stored or in use.	
				Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	The factory must collect and post MSDSs for all chemicals in use in the workplace	
				Workers have been trained to handle chemicals and hazardous substances		
				Firefighting equipment.	Install and maintain adequate and accessible fire fighting equipment in the workplace.	54
Emergency Preparedness				Accessible, unobstructed, and/or unlocked emergency exits during working hours, including overtime.	Ensure all exits and aisles remain unlocked at all time during working hours.	
				Safeguarding possible sources of ignition	Ensure all electrical equipment's are safely isolated and well maintained.	
Occupational Safety and Health	Health Services and First Aid			Health checks for workers who are exposed to work-related hazards.	Workers who have been exposed to work related hazards must be submitted to bi-annual medical checks.	
				Onsite medical facilities and staff.	The factory must hire additional medical staff to comply with requirements.	
				First aid boxes/supplies in the workplace.	The factory must ensure there is at least two fully equipped first-aid boxes per floor.	
				Annual medical checks for workers.	Ensure all workers are subjected to at least one medical check yearly.	
				OSH Management Systems		

Welfare Facilities		Toilets.	Provide the number of toilets required by the Haitian Labour code.	54
		Eating area.	Provide an adequate eating area to accommodate the workers.	
Worker Accommodation		Workplace temperature.	Take measures to reduce the temperature in the workplace.	12
Working Environment		Workplace lighting.	Provide adequate ventilation in the workplace.	
		Workplace ventilation.	The factory has improved the ventilation on the floors.	
Worker Protection		Providing workers with personal protective clothing and equipment.	Provide workers in spot cleaning sections with appropriate masks to protect against chemical vapors.	54
			The factory has installed guards on all dangerous moving parts of machines and equipment.	
Working Time		Time off for breastfeeding breaks.	Provide paid breastfeeding breaks to workers who are entitled to the benefit.	6
			No workers were found to exceed the limits of 80 hours per trimester for the reviewed period.	
		Working time records.	Record all working time in the attendance system to ensure time records reflect actual working time.	6
		Regular Hours		

Percentage of piece rate workers earning 300 (320 Gourdes as of May 2015) or more for eight hours of work (workers' average earnings):

Oct-13	Apr-14	Oct-14	Apr-15	Oct-15
27%	14%	36%	58%	59%

The Willbes Haitian III S.A.

Location:	Port-au-Prince
Number of workers:	653
Date of registration:	27-Aug-10
Date of last BW assessment:	4-Aug-15

- Factory was found non-compliant.
- ◐ Factory was progressing
- Factory was compliant.

Advisory and Training Services

Date	Activity
27-Feb-15	Information session about the STAR portal. Factory tour to assess progress on OSH issues.
5-Mar-15	Meeting with compliance manager to discuss the establishment of a PICC.
22-Apr-15	Follow up visit on the improvement process. Induction on STAR portal use and account activation.
23-Apr-15	Supervisory Skills Training.
29-Apr-15	Participation in an industry seminar on Better Work's revised service delivery model
20-May-15	Introduction of BWH revised service model and initialization of self diagnosis process.
30-Jul-15	Information session with HR and accounting staff on compensation issues.
10-Aug-15	Meeting with compliance team to clarify payment terms for holiday pay.

[illegible]

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
Compensation	Paid Leave											Payment for annual leave.	All wages earned must be included in the calculation for the annual leave payment.		
											●	Payment for sick leave.	Payment for sick leave must be paid based on average salary earned.		
												Payment for maternity leave.	Payment for maternity leave must be paid based on average salary earned.		
	Premium Pay														
	Social Security and Other Benefits											Employer contribution to OFATMA for maternity and health insurance.	Register all workers to OFATMA for maternity and health insurance and make necessary contribution.		
		●		●			●				●	Forwarding of workers' contributions to OFATMA.	Collect and forward workers' contribution for maternity and health insurance to OFATMA		
												Payment of annual salary supplement or bonus.	Ensure that payment of annual salary supplement or bonus is accurate.		
	Wage Information, Use and Deduction														
Contracts and Human Resources	Contracting Procedures														
	Dialogue, Discipline and Disputes											Disciplinary measures.	Disciplinary measures must comply with internal work rules and legal requirements.		
											●				
	Employment Contracts											Internal work rules.	The factory must revise the Internal work rules to ensure compliance with legal requirements.		
		●	◐	●							●				
	Termination	●		●				●	◐	◐	◐	Notice of termination.	Provide adequate notice of termination or related compensatory payment.		18

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
Occupational Safety and Health	Chemicals and Hazardous Substances	●	◐	●	◐	◐	◐	◐	◐	○	●	Labelling of chemicals and hazardous substances.	Properly label containers of chemicals and hazardous substances in use.		
												Storage of chemicals and hazardous substances.	Install a proper storage for chemicals and hazardous substances.		
												Washing facilities or cleansing materials in the event of chemical exposure.	Install eye wash stations in all areas where chemicals are stored or in use.		
												Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Collect and post MSDSs for all chemicals in use in the workplace		
												Accessible, unobstructed, and/or unlocked emergency exits during working hours, including overtime.	Ensure all exits and aisles remain unlocked at all time during working hours.	24	
	Emergency Preparedness	●	◐	●	◐	○	◐	◐	◐	●	◐			Adequate fire detection and alarm system were installed in the workplace.	
														Corrective measures were taken to ensure flammable materials are kept away from possible sources of ignition.	
												Annual medical checks for workers.	Ensure all workers are subjected to at least one medical check yearly.	54	
	Health Services and First Aid	●	◐	●	◐	◐	◐	●	◐	◐	◐			Newly hired workers are subjected to medical checks within first three months of assignment.	
	OSH Management Systems	●	○	●	○	○	○	○	○	○	○				

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
	Welfare Facilities											Toilets.	Provide the number of toilets required by the Haitian Labor code.		54
												Eating area.	Provide an adequate eating area to accommodate the workers.		
		●	●	◐	◐	●	●	●	◐	◐	◐			The factory took corrective measures to ensure soap is available in washing facilities.	
	Worker Accommodation	◐	◐	◐	◐	◐	◐	◐	◐	◐	◐				
	Working Environment	◐	◐	◐	●	●	●	●	●	◐	●	Workplace temperature.	Take measures to reduce the temperature in the workplace.		
	Worker Protection	●	◐	●	◐	◐	◐	◐	●	◐	◐			The factory properly accommodated all standing workers.	
														The factory has installed guards on all dangerous moving parts of machines and equipment.	
Working Time	Leave	◐	◐	●	●	◐	●	●	◐	◐	●	Time off for breastfeeding breaks.	Provide paid breastfeeding breaks to workers who are entitled to the benefit.		
	Overtime	●	◐	●	●	◐	●	◐	●	◐	◐				
	Regular Hours	●	◐	●	◐	◐	◐	◐	◐	◐	●	Daily break periods.	Ensure all workers are allowed to fully benefit of at least one hour break.		

Percentage of piece rate workers earning 300 Gourdes (320 as of May 2015) or more for eight hours of work (workers' average earnings):

Oct-13	Apr-14	Oct-14	Apr-15	Oct-15
27%	30%	28%	43%	25%

Annex 1. HOPE II Legislation Reporting Requirements

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

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

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