

Better Work Haiti: Garment Industry 10th Biannual Synthesis Report Under the HOPE II Legislation

Produced on 16 April 2015

Copyright © International Labour Organization (ILO) and International Finance Corporation (IFC) (2015)

First published (2015)

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

Libraries, institutions and other users registered with reproduction rights organizations may make copies in accordance with the licences issued to them for this purpose. Visit www.ifrro.org to find the reproduction rights organization in your country.

ILO Cataloguing in Publication Data

Better Work Haiti: garment industry 10th biannual synthesis report under the HOPE II legislation / International Labour Office; International Finance Corporation. - Geneva: ILO, 2015

1 v.

ISSN 2227-958X (web pdf)

International Labour Office; International Finance Corporation

clothing industry / textile industry / working conditions / workers rights / labour legislation / ILO Convention / international labour standards / comment / application / Haiti

08.09.3

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

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

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

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

Visit our website: www.ilo.org/publns

Acknowledgements

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

Core donors to Better Work are: Netherlands Ministry of Foreign Affairs Swiss State Secretariat for Economic Affairs Ministry of Foreign Affairs of Denmark The US Department of Labor

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

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

Table of Contents

List of Acronyms.....	6
Section I: Introduction and Methodology	7
1.1 Structure of the report	7
1.2. Context	8
1.3. The Better Work compliance assessment methodology.....	12
Section II: Findings	17
2.1. Compliance Assessment Findings (10 th round of assessments).....	17
2.2. Detailed Findings.....	19
1. Core labour standards	19
2. Working conditions	19
2.3. Compliance effort.....	28
Section III: Better Work Haiti Advisory Services and Training	31
3.1 Better Work Haiti Advisory Services.....	31
3.2 Better Work Haiti Training Services.....	31
3.3 Related activities	32
Section IV: Conclusions and Next Steps.....	33
4.1 Conclusion.....	33
4.2 Next Steps	34
Section V: Factories in Detail.....	35
5.1 List of factories.....	35
5.2. Findings from the factories.....	36
Factory Tables	38
Annex 1. HOPE II Legislation Reporting Requirements.....	141

List of Tables and Charts

In Focus 1: Social Security and Other Benefits	20
In Focus 2: Termination.....	21
In Focus 3: Chemicals and Hazardous Substances.....	22
In Focus 4: Emergency Preparedness	22
In Focus 5: Health Services and First Aid.....	23
In Focus 6: Welfare Facilities	24
In Focus 7: Worker Protection.....	25
In Focus 8: Working Environment	25
In Focus 9: Overtime	26
In Focus 10: Regular Hours.....	26
Chart 1: Non-compliance rate *	18
Chart 2: Compliance Effort	30
Table 1: Better Work compliance assessment framework	13
Table 2 : Piece rate workers' weighted average earnings across all factories assessed by Better Work	20
Table 3: Number of workers in factories registered to Better Work Haiti.....	35
Table 4: List of factories in the Haitian garment sector registered with Better Work as of February 2015	35

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 over 30,000 people. Most workers (66%) 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 conducted in 26 factories and advisory and training services provided to 28 factories in the period between September 2014 and February 2015. 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 tenth 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 which were assessed during the period September 2014 – February 2015. Twenty-four of these factories were included in the ninth synthesis report published in October 2014. One factory, Fox River Caribe Inc, had been assessed in previous cycles, was out of operations for two Better Work cycles (mid 2013 to mid 2014) and had now resumed operations and was therefore assessed again in this cycle. One factory, Val d'Or Haiti Apparel, has registered in late 2014 and was assessed for the first time in this cycle. Two more newly registered factories, Seed Apparel S.A. and The Little Haitian Factory S.A. have not yet been assessed by Better Work, and Gladiator Textiles LLC has temporarily suspended operations since late 2014 and hence no assessment could be conducted.

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.

The second section of the report outlines the compliance assessment findings from the tenth round of factory assessments, conducted between September 2014 and February 2015. 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 September-February 2015.

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.

The newly registered factory Val d'Or Apparel Haiti S.A. is included in the overall analysis of the sector over the past months. However, it has only been assessed once and hence, data from this factory has not been included in Sections 2.3 (Compliance Effort) and 5.2 (Findings from the factories/ Factories in detail) as a minimum of two assessments is required for inclusion in these sections.

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. Haiti exported 53,369,000 square meter equivalents (SMEs) of knit apparel, exceeding the previous quota of 52,000,000 SMEs for the first time. This resulted in the quota being increased to 200 million knit apparel SMEs for the 2015 calendar year. Haiti grew its value-added exports by 43% over 2013.
- The senatorial and regional elections, which were planned to be held in October 2014, were deferred. This resulted in a series of demonstrations and roadblocks. On 14 December 2014, the Prime Minister, Laurent Lamothe, resigned from his post. President Michel Martelly appointed an interim Prime Minister to replace Laurent Lamothe. "The United Nations and its international partners have welcomed the formation of a new Government in Haiti one week after the country's Parliament became 'dysfunctional' due to its failure to hold elections within its constitutional framework."¹ The new Haitian Prime Minister Paul handed over to the Provisional Electoral Council (CEP) a decree governing the organization of presidential, legislative and local elections which are all planned to be held in 2015.
- On 18 January 2015, the new minister of the Ministry of Labour and Social Affairs (MAST) Victor Benoit took over from Charles Jean-Jacques.
- In February 2015, after several months of consultations with the tripartite constituents, the ILO signed a Decent Work Country Programme (DWCP) for Haiti led by the ILO Sub-regional office in Costa Rica. The objective of the DWCP is to better articulate ILO interventions in Haiti and to provide better technical assistance to constituents.
- Over the course of 2014, Better Work Haiti elaborated its 2015-2017 strategy for the second phase of the program (first phase: 2009 – 2014) after consultations with the program's constituents. The new strategy, which is aligned with the strategy of the Better Work Global program, focuses on three axes: (i) strengthening of core service delivery in order to become a driver of change towards higher compliance with national labour law and international labour standards; (ii) increasingly using knowledge, experience, relationships and data to extend impact beyond the direct interventions at the factory level so that the industry becomes more stable in the long-term and contributes to a greater extent to the Haitian economy and society; (iii) strengthening the long-term viability of the programme through increased cost recovery, empowered national staff and strengthened partner institutions such as the Ministry of Labour, the employers' and workers' organizations.
- In December 2014, the annual Better Work Haiti buyers' and multistakeholder forum was held in Port-au-Prince and in the North East of Haiti. The forum allowed stakeholders of the industry to exchange on issues of common relevance. Several buyer representatives from international brands were present at the forum. During the multistakeholder forum, including representatives from the Government of Haiti, US Government, international brands, employers, unions, and other

¹ http://www.un.org/apps/news/story.asp?NewsID=49899#.VRxd_PyG-8A

social partners, discussions on the challenges of the industry in Haiti focused on productivity and the growth of the garment sector in Haiti. The second part of the forum consisted of a trip to the industrial parks in the North of Haiti (CODEVI and Caracol) to which Better Work Haiti buyers were invited. These two Northern locations represent about 30% of Haiti's garment industry with a total workforce of over 10,000 people. The joint visit allowed buyer representatives to evaluate the potential of Haiti's north as a sourcing destination and to gain a deeper understanding of the implications and the relevance of Haiti's North for the industry of the country.

- Three new factories registered to the Better Work Haiti program in late 2014/ early 2015 and one has already been assessed by Better Work in the most recent assessment cycle. In the context of mandatory participation, factories register and engage in the program as soon as production begins. All factories joining the Better Work Haiti program obtain access to a service package of assessment, advisory and training services.

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 several initial 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.

It is 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 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. To this end, a joint protocol is about to be concluded and signed by MAST authorities and the Labour Ombudsperson.

Industrial Relations in the Haitian garment industry

At the time of writing, 30 officially recognised factory level unions are present in the apparel factories. These union cells are affiliated to 8 centrals/confederations and are present in 19 out of

the 28 currently operating factories part of the Better Work Haiti program. Thus, approximately 68% of those participant apparel factories in the country now have a union presence.²

In 2014 the Haitian labour movement benefited from the support of Solidarity Center/AFL-CIO and the International Trade Union Confederation/ Trade Union Confederation of Americas (ITUC-TUCA). The Solidarity Center, AFL-CIO Haiti office conducted educational workshops for unions in the garment sector in Port-au-Prince, Ouanaminthe and Caracol, accompanied unions in meetings with employers, participated in the Social Dialogue Table, and participated in multiple activities organized by the ILO and Better Work Haiti. In 2015, because of significantly reduced funding, the Solidarity Center will no longer have a full-time Director in Haiti but will continue to maintain a local office in Port-au-Prince. ITUC-TUCA supported Haitian trade union organisations through a variety of capacity building measures in 2014. Their work has a broader focus than the garment industry only. Areas in which ITUC-TUCA provided support to Haitian labour unions in 2014 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 organising campaigns in different sectors and regions in the country.

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 three meetings on the minimum wage and production quotas, one meeting with the public health and accidents insurance OFATMA and a separate one with the public old age insurance institution ONA. The Labour Ombudsperson is actively involved in these exchanges of the social dialogue roundtable.

As of January 2015, Better Work Haiti has designated a full-time Industrial Relations Officer. This person will liaise with national partners to assist the sector in these efforts and to further strengthen social dialogue. The Better Work Haiti Industrial Relations Officer will work closely with the social dialogue table, the Labour Ombudsman and all the unions of the garment industry in Haiti. Recently, 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

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.

being noticed which speaks for evolving industrial relations with a clear intent by all parties involved to improve cooperation.

Better Work Haiti will support these efforts through participation in the 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.

The Office of the Labour Ombudsperson was opened in Building 48 in the Metropolitan Industrial Park (SONAPI). The office space is shared with CTMO-HOPE. The support team for the Labour Ombudsperson has elaborated working papers to clearly define the support the Ombudsperson's office offers to the garment sector in Haiti.

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. The Labour Ombudsperson is also providing support to the social dialogue roundtable and is actively involved in conflict situations that evolve at the factory level. In this context, she has been involved in different cases in six factories alone in the first three months of 2015. 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.

Labour law reform

Since 2011, the ILO has been providing technical assistance to reform the Haitian Labour Code. As a result, based on inputs from MAST and social partners, a first draft of the Labour Code was prepared. Following tripartite discussions, 11 out of 38 chapters from the draft Code were adopted in October 2013. In November 2014, a revised draft of the Labour Code was shared with the tripartite constituents, which integrates the outcomes of the October 2013 discussions and other comments by the Office. The draft Labour Code is currently examined by workers and employers. The tripartite consultation process will resume after the examination of the draft by each of the parties. The ILO's Decent Work Country Programme for Haiti, adopted in early 2015, establishes that the revision of the Labour Code should be finalised by the end of July 2015. The ILO is currently looking at ways and resources to support the social partners in their revision of the draft, in particular through external consultants.

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 Standards	1	Child labour	1. Child Labourers 2. Unconditional Worst Forms 3. Hazardous Work 4. Documentation and Protection of Young Workers
	2	Discrimination ³	5. Race and Origin 6. Religion and Political Opinion 7. Gender
	3	Forced Labour	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
Working Conditions	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
	6	Contracts and Human Resources	24. Employment Contracts 25. Termination 26. Dialogue, Discipline and Disputes 27. Contracting Procedures

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.

	7	Occupational Safety and Health	28. OSH Management Systems 29. Chemicals and Hazardous Substances 30. Worker Protection 31. Working Environment 32. Health Services and First Aid 33. Welfare Facilities 34. Worker Accommodation 35. Emergency Preparedness
	8	Working Time	36. Regular Hours 37. Overtime 38. Leave

Calculating non-compliance

In public synthesis reports, Better Work reports on aggregate non-compliance in the participating industry as shown in Chart 1. Non-compliance is reported for each subcategory (compliance point, or “CP”) of the eight 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.

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 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 more than 250 questions covering the abovementioned labour standards. Information is gathered through a variety of sources and techniques, including document review, observations on the shop floor, and interviews with managers, workers and union representatives. The information collected is compiled

and analyzed 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 ten assessments conducted over 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. An average of 40 workers representing different sections of the factories, as well as union representatives, is 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, in 2014, 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 organised 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 described in the following section, a revised service delivery model with a stronger focus on advisory services will be implemented in all Better Work country programs as of 2015 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 new service delivery model will put 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-centred approach to more in depth advisory and training services. Therefore, starting with the completion of this 10th round of assessments by Better Work Haiti and the publication of this tenth compliance synthesis report, the program will move to one assessment per factory per year and stronger focus on advisory services and management systems.

Implications 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

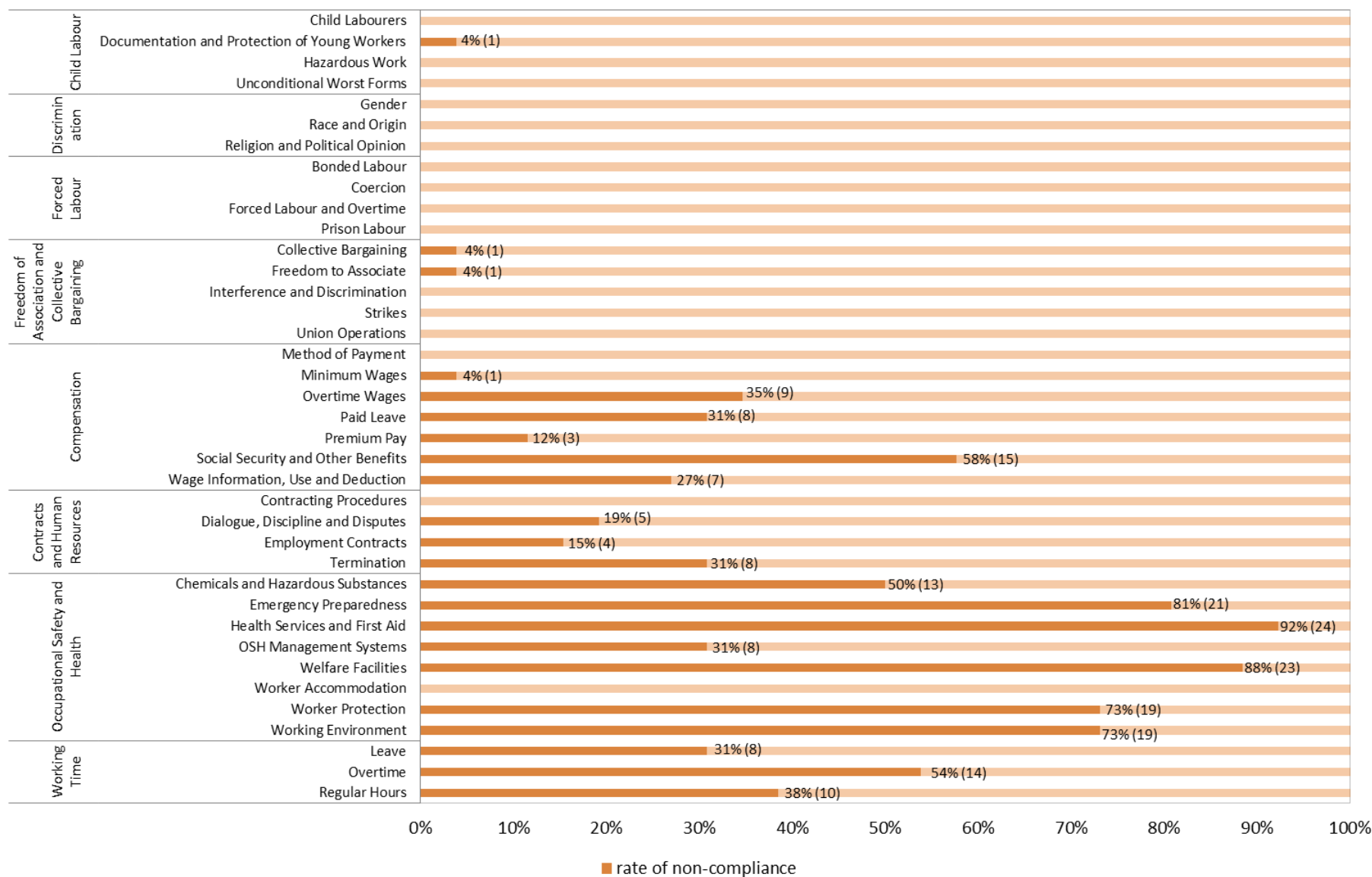
2.1. Compliance Assessment Findings (10th round of assessments)

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 February 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 is, however, one finding of non-compliance in the Child Labour cluster in this assessment cycle. In the case of one factory, two workers' files were found with no government issued ID (copy of national CIN card or birth certificate) which is usually used in the recruitment process. In addition, apprentice workers and those working as maids offsite did not have registered files with proper documentation to show their age. Factory management acknowledged this finding and stated that they would take action to comply with the law.

B. DISCRIMINATION

In this assessment cycle, no factory was found to be in non-compliance in the Discrimination Cluster.

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 two instances of non-compliance in this reporting period under the Cluster for Freedom of Association and Collective Bargaining. Both Collective Bargaining and Freedom to Associate have non-compliance rates of 4% each. 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. In another factory, four workers who were union members were dismissed last year over a period of a couple weeks in August. Their files stated "lack of work" as the reason for their termination. Following the first of these terminations, the union requested a meeting with factory management. Two additional unionists were fired that day. The workers' files contained no disciplinary warnings. Several meetings between factory management, representatives from the concerned union and the Labour Ombudsperson took place. Although factory management had agreed to consider reinstating some of the dismissed workers, none of the four had been reinstated at the time of the assessment in November. These terminations have impaired the right of workers to form a union of their choosing in the factory.

2. Working conditions

E. COMPENSATION

In the compensation cluster, the highest numbers of non-compliances persist in the Social Security and Other Benefits Compliance Point which has a 58% non-compliance rate. The issues are detailed in the table below.

In Focus 1: Social Security and Other Benefits

<i>Question</i>	<i># factories out of compliance</i>
Does the employer collect the required contribution to OFATMA from all workers?	0
Does the employer collect the required social insurance contribution to ONA from all workers?	3
Does the employer forward workers contributions to OFATMA?	0
Does the employer forward workers contributions to ONA?	9
Does the employer pay 3% of workers' basic salary to OFATMA for maternity and health insurance?	0
Does the employer pay 3% of workers' basic salary to OFATMA for work-related accident insurance?	3
Does the employer pay the required employer contribution to ONA?	11
Does the employer pay workers their annual salary supplement or bonus?	6

The number of factories that are in non-compliance on ONA (pension funds) payments is highest in this compliance point with 40 percent of factories not forwarding employer and worker contributions to ONA according to the law. While factories do actually pay the contributions to ONA, the payments of the required ONA contributions are not made within the stipulated time frame. The Labour Law requires payments (6% of basic salaries from employees and 6% of basic salaries from employers) to be made before the 10th of each month. Of the three factories that are in non-compliance on the payments for work-related accident insurance, two factories have never paid OFATMA contributions stating that they are unwilling to contribute to OFATMA as they are not satisfied with the service provided. The other non-compliance relates again to late payments of the required contributions.

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 earning 225-249/250-299/300 and more Gourdes per day.

Table 2 : Piece rate workers' weighted average earnings across all factories assessed by Better Work⁵

Average % of workers earning between 225 and 249 in 8 regular hours	Average % of workers earning between 250 and 299 in 8 regular hours	Average % of workers earning 300 Gourdes or more in 8 regular hours
27%	32%	41%

⁵ Better Work collects the percentages of piece rate workers per factory who earn 225-249 Gourdes, 250-299 Gourdes or 300 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, meaning that if a worker earns 300 Gourdes per 8 hour day on nine out of ten days and then earns 250 Gourdes on the tenth day, the average earnings over the ten days would be recorded under the 250-299 Gourdes category. 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.

F. CONTRACTS, AND HUMAN RESOURCES

The highest non-compliance rating in this cluster is under the Termination Compliance Point (31%).

In Focus 2: Termination

<i>Question</i>	<i># factories out of compliance</i>
Do workers have an opportunity to defend themselves before they are terminated based on their conduct or performance?	3
Does the employer compensate workers for unused paid annual leave when they resign or are terminated?	2
Does the employer comply with legal requirements before reducing the size of the workforce due to changes in operations?	2
Does the employer notify the labour ministry when suspending operations due to lack of materials, force majeure, or accident resulting in an immediate work stoppage?	1
Does the employer only terminate workers for valid reasons?	7
Does the employer pay judicially ordered damages for wrongful termination?	0
Does the employer pay workers their annual salary supplement or bonus upon termination?	3
Does the employer provide workers proper notice of termination when required, or pay workers during the notice period?	0
Has the employer complied with any orders to reinstate or compensate workers who were found to be unjustly terminated?	0

In seven instances, Better Work found files of terminated workers who were terminated for reasons that were not valid. Of these, in six factories, some workers' files did not provide any reason at all for the termination. In all of these factories, it was only single cases/files that were identified as non-compliant with the legal requirements for termination and not a systematic failure to indicate the reasons for the termination. Three factories did not offer workers the opportunity to defend themselves before they were terminated. In one of the three cases, the factory confirmed that terminations were often made on the floor by floor managers. Interviewed workers in the two other factories stated that they had no chance to defend themselves upon termination. In one factory workers even stated that they were not allowed to even speak in the HR office.

In two factories the employer did not compensate workers for unused paid leave upon resignation or termination. In one case, a review of terminated workers' files showed that the factory does not compensate workers for unused paid annual leave according to the law in the case of workers being terminated within the first 3 months of hiring. The management of that factory stated that they were not aware of the exact way to make such payments and added that they will correct this practice. In the second case, EAs did not find any written proof of payment of salary severances. Therefore, it was not possible to determine if the factory compensates workers for unused paid annual leave correctly when they resign or are terminated. Factory management acknowledged the issue and stated that payment receipts would be attached to workers' files in the future.

Similar cases were identified for the payments of workers' annual salary supplement or bonus upon termination. Factories acknowledged the mistake in the calculations.

Two factories did not comply with legal requirements before reducing the size of the workforce as no advanced notice had been given to the Ministry of Social Affairs and Labour (MAST).

G. OCCUPATIONAL SAFETY AND HEALTH (OSH)

Occupational Safety and Health remains the Cluster with the highest percentages of non-compliance. The Compliance Point for Chemicals and Hazardous Substances has a 50% non-compliance rate and further details on the specific non-compliances are indicated in the table below.

In Focus 3: Chemicals and Hazardous Substances

<i>Question</i>	<i># factories out of compliance</i>
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?	8
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?	5
Has the employer taken action to assess, monitor, prevent and limit workers' exposure to chemicals and hazardous substances?	3

While there were improvements in compliance regarding chemical and hazardous materials, non-compliance rates remain high due to the same underlying root causes. Factories do not have a management system in place to ensure that containers are always labelled, Material Safety Data Sheets (MSDS) are continuously provided, and the inventories are always kept up to date. Furthermore, the continuous replenishment of these substances contributes to the high non-compliance rates in this area. Six factories were found in non-compliance on labelling and proper storing of chemicals and hazardous substances and eight did not have the required MSDS for them.

Eleven factories lacked sufficient well equipped eye wash stations, which is a major concern in the event of exposure to chemicals.

Five factories were found in non-compliance for not effectively training their workers who work with chemicals and hazardous materials. Training of workers who work with chemical and hazardous is not always formalised, or it is insufficiently provided, as workers neglect to follow instructions on the safe use of chemicals.

The Compliance Point on Emergency Preparedness remains high with a 81% non-compliance rate for this past assessment cycle. Details are indicated below.

In Focus 4: Emergency Preparedness

<i>Question</i>	<i># factories out of compliance</i>
Are emergency exits and escape routes clearly marked and posted in the workplace?	11
Are flammable materials safely stored?	2
Are possible sources of ignition appropriately safeguarded?	3
Are the emergency exits accessible, unobstructed and unlocked during working hours, including overtime?	1
Are there enough emergency exits?	2

Does the employer conduct periodic emergency drills?	2
Does the workplace have a fire detection and alarm system?	12
Does the workplace have adequate fire-fighting equipment?	10
Has the employer trained an appropriate number of workers to use the fire-fighting equipment?	1

Eleven factories had not clearly marked escape routes in the workplace and/ or had emergency exit signs missing or not functioning.

In two of the three factories in which possible sources of ignition were not properly safeguarded, mobile phones were charged with wires lying on fabrics. In the third case, a mechanic was found doing welding work in the stock area where inflammable material such as fabric and thread is being stored.

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

The highest level of non-compliance in the OSH Cluster is again found in the Compliance Point on Health Service and First Aid with a non-compliance rate of 92%.

In Focus 5: Health Services and First Aid

<i>Question</i>	<i># factories out of compliance</i>
Do workers have a medical check within the first three months of hiring and annual medical checks?	18
Do workers who have been exposed to work-related hazards receive free health checks?	5
Does the employer address safety and health risks to pregnant or nursing workers?	0
Does the workplace have required onsite medical facilities and staff?	21
Has the employer ensured there are a sufficient number of readily accessible first aid boxes/supplies in the workplace?	7
Has the employer provided first-aid training for workers?	2

As in the previous cycle, a total of 18 factories were non-compliant on conducting medical checks within the first three months of hiring and annual medical checks. According to the Haitian Labour Code, annual medical exams are the responsibility of the Haitian institution OFATMA. Yet, these services are still not sufficiently delivered. The Social Dialogue Roundtable initiated a meeting between employers, unions and OFATMA to discuss this critical issue. Follow-up of this discussion and further coordination will be ensured through the social dialogue roundtable. During the meeting, OFATMA committed to share with the employers the list of participating doctors affiliated with OFATMA and to find ways to make it easier for the factories to have the workers' medical checks being performed. An agent from OFATMA was assigned to the Social Dialogue Roundtable to be the focal point to ensure follow up of this engagement.

Twenty-one factories failed to provide the required number of medical facilities and staff. While this is required by the Haitian Labour Law, many factories actively chose to not hire the required number of medical staff, and contested that there was not sufficient work for them. Law requires one onsite

nurse for factories with between 50 and 200 workers, two nurses for factories with between 200 and 500 workers and one additional nurse for every additional 200 workers in the factory. Moreover, factories with fewer than 200 workers should provide weekly doctor's visits, and factories with more than 200 workers should have permanent on-site medical services. Better Work has observed improvements regarding the hiring of doctors, but the number of nurses on-site remains significantly below the requirements, resulting in non-compliance. Some factories also have made arrangements with nearby medical facilities which provide workers free access to medical services there.

Only two factories failed to train the recommended 10% of their workforce on first aid which is a significant improvement and a result of factories having learned the importance of complying with this requirement. However, seven factories were found to be in non-compliance regarding first aid boxes. In one factory, the boxes were empty, in two factories one box was missing each and in the remaining cases, all cases, the boxes were not readily accessible with keys not being available to open the box quickly.

Eighty eight percent or 23 factories were non-compliant under the Welfare Facilities Compliance Point as further specified in the table below.

In Focus 6: Welfare Facilities

<i>Question</i>	<i># factories out of compliance</i>
Does the employer provide workers enough free safe drinking water?	2
Does the workplace have adequate accessible toilets?	20
Does the workplace have adequate hand washing facilities and adequate soap?	9
Does the workplace have all required facilities?	0
Does the workplace have an adequate eating area?	10
Is the workplace clean and tidy?	4
Does the employer provide workers enough free safe drinking water?	2

Welfare Facilities has high non-compliance levels due to the number of toilets, inadequate hand washing facilities and soap, and factories' eating areas. Similar to the stringent requirements of the Haitian Labour law on the number of medical staff, the number of toilets that must be available in the workplace is seen as equally demanding. The law stipulates that there should be one toilet for every 25 men and one toilet for every 15 women. Better Work recommends that existing toilets are well maintained in order to compensate for insufficient numbers. During assessments, Better Work therefore verifies the functioning of the toilets and also observes if there are lines in front of the bathrooms, which is rarely the case.

Non-compliance for adequate washing facilities and adequate soap in nine factories all relates to insufficient soap being provided at all times. Adequate hand washing facilities were available in all factories.

While all factories provide drinking water to workers, in two factories water quality was found to be unsatisfactory.

Ten factories were found to be in non-compliance with regards to the eating area. Four factories are completely missing an eating area. The other six have an eating area, but it is not sufficient to accommodate all workers.

Four factories were not found to be sufficiently clean and tidy.

Under the Worker Protection Compliance Point, 19 factories were found in non-compliance during the last assessment which corresponds to 73% of all assessed factories.

In Focus 7: Worker Protection

<i>Question</i>	<i># factories out of compliance</i>
Are appropriate safety warnings posted in the workplace?	3
Are electrical wires, switches and plugs properly installed, grounded, and maintained?	4
Are materials, tools, switches, and controls within easy reach of workers?	0
Are proper guards installed and maintained on all dangerous moving parts of machines and equipment?	15
Are standing workers properly accommodated?	8
Are there sufficient measures in place to avoid heavy lifting by workers?	1
Are workers effectively trained and encouraged to use the personal protective equipment that is provided?	6
Are workers effectively trained to use machines and equipment safely?	6
Are workers punished if they remove themselves from work situations that they believe present an imminent and serious danger to life or health?	0
Do workers have chairs with backrests?	4
Does the employer provide workers with all necessary personal protective clothing and equipment?	7

Fifteen factories did not have the appropriate guards installed on all dangerous moving parts of machines and equipment. Since the guards can break and need regular verification and replacement, non-compliance rates tend to be high as many factories are lacking effective mechanisms to systematically monitor the situation and update machine guards when necessary. Only through a system which allows regular verification and update can this non-compliance be controlled in a sustainable manner. Better Work's adjusted service delivery model is aiming at strengthening management systems in factories.

Standing workers were not properly accommodated in eight factories. Haitian Labour Law requires that they be provided with chairs to sit on in regular intervals. Better Work also recommends that fatigue mats and/ or footrests are being provided to standing workers.

Six factories failed to effectively train workers on the use of personal protective equipment as well as on the safe use of machines and equipment. This is a recurring issue as workers are usually informed of the need to wear their PPE in certain work stations, yet there is not always a formalised training being provided to them to ensure that workers fully understand the necessity to wear their PPE and thus do not comply with the requirement. In seven factories, workers did not have access to all of the necessary protective equipment recommended for their respective jobs.

Four factories did not provide chairs with backrest to workers.

In Focus 8: Working Environment

<i>Question</i>	<i># factories out of compliance</i>
Are noise levels acceptable?	2

Is the temperature in the workplace acceptable?	11
Is the workplace adequately lit?	15
Is the workplace adequately ventilated?	1

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 levels were found to be too high in 11 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 15 factories were found to be non-compliant on light levels. The situation with regards to noise and light levels were found improved in comparison to the previous cycle. However, two factories continued to have noise levels exceeding the recommended maximum of 90 db and one factory was not adequately ventilated.

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 (54%).

In Focus 9: Overtime

<i>Question</i>	<i># factories out of compliance</i>
Does the employer comply with limits on overtime hours worked?	11
Does the employer obtain authorization from the Department of Labour before working on Sundays?	5
Does the employer obtain authorization from the Department of Labour before working overtime?	4
Is overtime work voluntary?	0

The legal limit by the Haitian Labour Code is a maximum of 80 hours of overtime per trimester. In eleven factories, some sections have performed overtime exceeding this legal limit which is a significant increase to only four factories which exceeded this limit in the past cycle. Five factories did not obtain authorisation from the Department of Labour before working Sundays and four factories failed to obtain this authorisation before working overtime.

In Focus 10: Regular Hours

<i>Question</i>	<i># factories out of compliance</i>
Do regular daily working hours exceed legal limits?	0
Do regular weekly working hours exceed 48 hours?	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

A significant deterioration in terms of compliance in the Working Time Cluster was identified in the Compliance Point on Regular Hours which shows an overall non-compliance-rate of 38%. Ten factories were found to be in non-compliance with working time records that reflect the hours actually worked. In several factories hours worked on Sundays are recorded separately and are not included in the main attendance records of the factories. In three of ten factories, the systems used to record working time were flawed. Two factories still maintained a manual record of workers' attendance, which was found to be erroneous. One of these factories expressed their intention to purchase a punching system. A third factory claimed that irregularities found in their attendance records were due to a problem with their system which they are working to resolve. One factory was found to be using separate attendance records for workers who had contracts versus those who did not.

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. It must be noted that, as the compliance effort is an aggregate indicator for all factories that have been assessed at least twice by Better Work Haiti, it is sensitive to simultaneous 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.

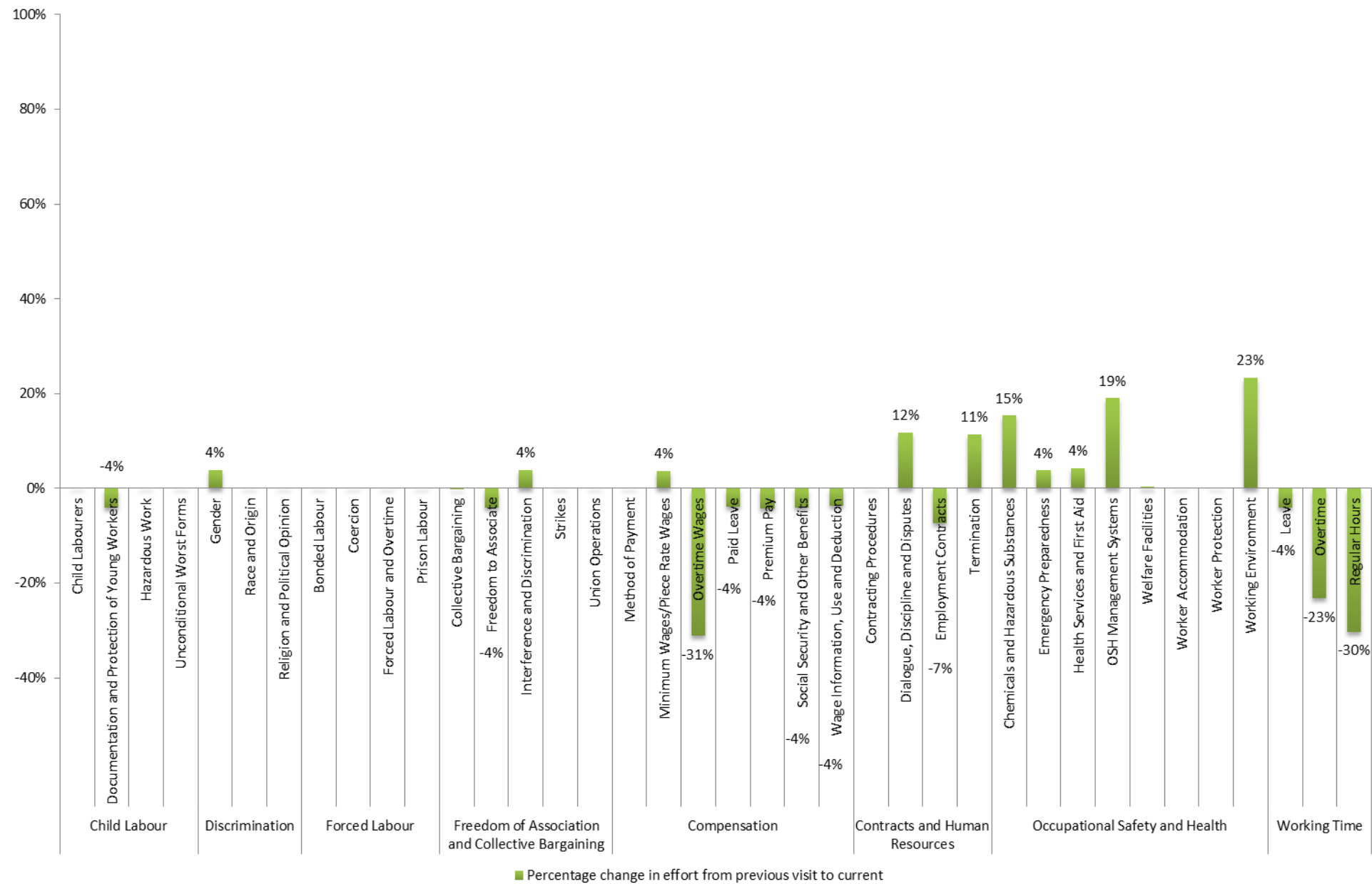
Among the 25 factories that have been assessed more than once, 12 factories reduced the number of violations, in eleven factories there were more violations in this period than in the previous one and 2 stayed the same.

The major findings regarding significant compliance changes are summarised in the bullet points below.

- **Overtime Wages:** The decrease in compliance with regards to overtime wages is due to an increase in the number of factories that failed to pay workers 100% above the normal wage for all overtime hours worked at night. In this context it has to be noted that factories in Haiti did not use to work at night but recently, some factories have moved to night work (after 6 pm). In all cases identified to be in non-compliance on overtime wages for work at night (5 factories in total), workers were paid 50% above the normal wage instead of the 100% required by the law.
- **Dialogue, Discipline and Disputes:** Under the compliance point of “Dialogue, Discipline and Disputes” compliance increased by 12% due to improvements on 2 compliance questions. First, fewer factories were found in non-compliance on disciplinary measures complying with legal requirements and second, bullying, harassment or subject to humiliating treatment has been identified as an issue in 2 versus 5 factories previously. This may be partly attributed to Better Work's Supervisory Skills Training which is offered to all factories in Haiti. So far, more than 400 supervisors of about half of all of Haiti's garment factories have participated in this 3 day long training. The training gives supervisors guidance on how to effectively fulfil their duties in the factories without using an authoritarian leadership style.
- **Chemicals and Hazardous Substances:** Occupational Safety and Health remains the cluster with the highest non-compliance in factories. Among these, the compliance point on Chemicals and Hazardous Substances has always had a high non-compliance rate, however in this past cycle, a compliance improvement by 15% can be noticed. As described in further detail in the section on trainings (3.2), Better Work in collaboration with the Interamerican Development Bank (IDB) has offered various trainings to factories on OSH topics over the past 3 years. In October 2014, a training on chemical management systems was offered to all factories and the results can be seen in increased compliance improvements which testifies of the importance of training measures to contribute to increased compliance levels.

- **OSH Management Systems:** A compliance improvement of 19% can be seen in the Occupational Safety and Health Management Systems Compliance Point. One improvement under this compliance point is that more factories regularly report their work-related accidents to OFATMA. Yet, more significantly, an increased number of factories have been conducting OSH self-assessments during the past months. Better Work continues to work with OSH committees inside the factories to fulfil their roles and part of this is to conduct these self-assessments as Occupational Safety and Health issues require daily attention inside the factory and only through effective systems in place can risks be eliminated in the long term.
- **Overtime:** A 23% decrease in compliance levels under the Overtime compliance point has been noted in this past assessment cycle. At the question level, a significant increase on non-compliance occurred due to eleven factories not complying with the limits on overtime hours worked. In Haiti, the law allows 80 hours of overtime for a trimester and requires prior authorisation from the Ministry of Social Affairs and Labour. In all of the eleven cases, it was individual workers or particular sections of the factory which were affected by the overtime hours worked beyond legal limits (often inspection or packing departments). It has to be noted that no factory was found in non-compliance on overtime not being voluntary.
- **Regular Hours:** Under the Compliance Point on Regular Hours, the question that provoked the 30% increase of non-compliance under this CP was “Does the employer keep working time records that reflect the hours actually worked?”. Ten factories were cited in non-compliance under this question and CP. As described in the focus table 10 in the section, in several factories hours worked on Sundays are recorded separately and are not included in the main attendance records of the factories. In three of ten factories, the systems used to record working time were flawed. Two factories still maintained a manual record of workers’ attendance, which was found to be erroneous. One of these factories expressed their intention to purchase a punching system. A third factory claimed that irregularities found in their attendance records were due to a problem with their system which they are working to resolve. One factory was found to be using separate attendance records for workers who had contracts versus those who did not.

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 September 2014 to February 2015 which was again mainly focused on the bipartite workers-management committees at the factory level (PICCs).

Better Work programs include compliance assessments, advisory and training services. In advisory services, Better Work EAs typically work with the factory to set up a bipartite worker-management committee known as a Performance Improvement Consultative Committee (PICC). The EA works with the PICC to create and implement improvement plans that address both non-compliance issues and management systems issues. While factories are responsible for identifying and implementing improvement plans, advisory services ensure a tailored approach that provides direction and capacity building.

In the past, there were some challenges setting up PICCs in Haiti. Due to these challenges, Better Work Haiti EAs have primarily provided advisory services with the management team of the factories through assistance in writing the improvement plans and monitoring of the remediation efforts. In order to ensure the involvement of worker representatives in these remediation efforts, Better Work Haiti has continued to assist the already established bipartite OSH committees in factories. However, in 2014, Better Work Haiti has been working with factories and unions to strengthen existing PICCs and establish new ones. At the time of writing this report, five factories have established PICCs, and in three factories the set-up of the committee has been initiated and will be completed by May 2015. In seven other factories, management has agreed to set-up this bipartite structure at the factory level and Better Work Haiti is working closely with factories in advisory services to set-up and facilitate the functioning of these committees. During advisory services, Better Work Haiti Enterprise Advisors discuss the purpose, composition and functioning of the PICC with factory management and – if applicable - existing union cells at the factory level during advisory services. A pre-PICC training is being held for interested candidates. Information flyers for all workers are being distributed prior to the election of worker representatives to inform workers about the process.

In March 2015, Better Work Haiti Enterprise Advisors have been trained on the new service delivery model which Better Work is implementing in all of its country programs as of early 2015. In Haiti, an industry-wide seminar will be held in late April/ early May to introduce the changes in Better Work's approach to the factories.

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 2014, Better Work Haiti's Training Officer has been largely focussing on the supervisory skills training. Over the course of past year, 441 supervisors from 12 factories have participated in the three day long training course which is funded by the Walt Disney Company. The training is designed to give supervisors and middle managers a deeper understanding of important leadership and supervision concepts. Participants are trained to avoid a passive or authoritarian style of leadership and to strike a fair balance between the interests of the company and the interests of staff. The training also covers the topic of sexual harassment.

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

As the highest non-compliance rates for the entire sector remain in the cluster *Occupational safety and health* (OSH), Better Work continues to provide support to factories on this topic. In cooperation with the Interamerican Development Bank (IDB), Better Work Haiti offered extensive training sessions to factory OSH committees since 2012. Effectively functioning OSH committees can assist factories in the systematic improvement of OSH-related non-compliance issues. After a Training of Trainers on OSH issues conducted by IDB for key factory personnel in June 2014, a training on chemical management systems was offered in October 2014.

In the context of the adjusted service delivery model which Better Work will implement in 2015, the Haiti program will also strengthen its training offer as the reduction in the number of assessments will free up human resources that will partially be allocated to trainings. Better Work Haiti has appointed an EA focal point for trainings in addition to the full time training officer in the team. This training focal point will help to coordinate and plan trainings and will assist the training officer in the liaising with factories. She will also be in charge of the shared learning seminars, which are one component of the new service delivery model. These 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. Moreover, Better Work is extending its training portfolio to include additional topics such as workers' rights and responsibilities, Human Resources and others.

3.3 Related activities

HERhealth (previously known as HERProject)

The majority of workers in the garment sector are women. In Haiti the current percentage is at 66% being women and therefore, a particular focus on topics of relevance for women is indispensable for Better Work activities. In this context and in partnership with Share Hope Foundation and the Levi Strauss Foundation, HERhealth was launched in Haiti in early 2014. This project focuses on women's health issues. A peer approach is being used to train female factory workers on health issues, such as hygiene, maternal health, nutrition, HIV/AIDS and others. The one-hour training modules are designed for a workplace setting and are intended to have widespread effects that go beyond the factory context and impact communities. All participants receive a pamphlet at the end of each training that summarizes the information. This allows them to review what they have learned and pass it on to their communities. The peer educators (PEs) are trained and equipped with additional information and training booklets that allow them to become credible disseminators of this valuable material to their communities. To maintain a peer educator model, PEs are chosen from among a broad range of workers and identified for their leadership qualities with their peers and not their

status within the factory hierarchy. Share Hope Foundation, which is implementing the HERProject activities in Haiti, has also begun to train factory clinic nurses on the modules, envisioning a time when the factories can/will internalize this type of teaching as part of their method of operation and allowing for sustainability beyond the initial Brand involvement. The project was initially launched in a first factory in the metropolitan industrial park SONAPI at Pacific Sports Haiti S.A. and in April, parallel project activities started in CODEVI in Ouanaminthe in the northern part of the country. Depending on the size of the factory, the entire project duration is between 18-24 months per factory to train female workers on 6 different modules. Share Hope Foundation is planning to continue the project beyond the initial two factories. Potential factories for delivery of the trainings are currently being assessed. Several have already contacted Share Hope Foundation.

OSH Event

On 25 October 2014, Better Work Haiti held its fourth annual OSH fair. More than 2,500 workers from 17 factories in Port-au-Prince were given the opportunity to get free medical checks. As in previous years, Better Work partnered with a number of institutions to provide these services during the event. Haitian Red Cross, OFTMA, Share Hope, CFPO, Starkey Foundation, *Faculté des Sciences Infirmières de Leogane* and Dr. Frantz Large offered workers free general, gynecological and visual consultations. The day was also accompanied by training and awareness raising sessions on various health topics such as training on Occupational Safety and Health. Although the day was a success in terms of number of workers who received free medical health checks, Better Work Haiti decided to not repeat the OSH event in this format next year as the ratio of resources invested and outcomes obtained are quite imbalanced. Instead, the program will explore options to collaborate with its OSH partners on a longer term basis in order for them to provide services to workers on a more sustainable basis. This includes discussions with the governmental social security institutions ONA and OFATMA about the scope of their services to factories and workers. Factories' compliance with payments for these governmental social security institutions increased substantially since the inception of the Better Work Haiti program and their services such as annual medical checks for workers are insufficiently implemented.

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 legislation has opened opportunities and brought about changes in the industry in Haiti. Old and new actors have to work together to find workable solutions to challenges. The commitment to set up a social dialogue roundtable for the sector has set a precedent for other industries in the country, and reflects a change of culture. The establishment of bipartite committees at the factory level will further strengthen this new approach.

This tenth Better Work Haiti synthesis report highlights both the current state of working conditions in the factories enrolled in the program as well as the improvements that they have made in the last months.

Occupational Safety and Health remains the cluster with the highest non-compliance rates although many of the non-compliance issues are rather easy to fix.

As stated before, 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 planned adjustments in the services that Better Work delivers to factories will provide opportunities for the program to work with factories on root causes that are underlying repeated non-compliance issues.

4.2 Next Steps

Better Work Haiti 2015 - Implementation of the Adjusted Service Delivery Model

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.

Reporting

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.

Section V: Factories in Detail

5.1 List of factories

As of February 2015, 29 factories were registered with Better Work Haiti. Three factories, Val D'Or Haiti Apparel S.A., The Little Haitian Factory S.A. and Seed Apparel S.A. joined the program in the reporting period. Val D'Or has already been assessed by Better Work while the other two factories have started to be enrolled in advisory services. Gladiator LLC is currently not producing. Hence, they were both not assessed in this past cycle of Better Work assessments.

Table 3: Number of workers in factories registered to Better Work Haiti⁶

	June 2010	Dec 2010	June 2011	Dec 2011	June 2012	Dec 2012	June 2013	Dec 2013	July 2014	Feb 2014
N° of workers in factories registered to Better Work Haiti	22,598	27,264	27,000	24,298	24,497	25,924	28,591	29,299	30,841	32,147
Of these, N° of women workers	14,796	16,978	15,783	15,523	15,380	16,688	17,887	18,899	20,284	21,291

Table 4: List of factories in the Haitian garment sector registered with Better Work as of February 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
4.	Fairway Apparel S.A.	Registered in 2010
5.	Fox River Caribe, INC	Registered in 2009
6.	Genesis S.A.	Registered in 2009
7.	Gladiator Textiles LLC	Registered in 2012 (currently out of operations)
8.	Global Manufacturers & Contractors S.A.	Registered in 2010
9.	H&H Textiles S.A.	Registered in 2014
10.	Horizon Manufacturing S.A.	Registered in 2010
11.	Indigo Mountain Haiti S.A.	Registered in 2012
12.	Industrial Revolution II S.A.	Registered in 2014
13.	Interamerican Wovens S.A.	Registered in 2009

⁶ This table contains the number of workers from 27 out of the 29 factories listed in Table 4 "List of factories in the Haitian garment sector registered with Better Work as of February 2015". Gladiator LLC is currently out of operations and Seed Apparel S.A. has not yet started operations. Also please note that the total number of workers only reflects the number of production workers but not all employees of the factory. Management staff for all factories adds up to an additional 3,477 employees for all of the 27 factories included in this calculation.

14.	Johan Company	Registered in 2009
15.	Modas BU IL Haiti S.A.	Registered in 2013
16.	MGA Haiti S.A	Registered in 2009
17.	Multiwear S.A.	Registered in 2009
18.	One World Apparel S.A.	Registered in 2009
19.	Pacific Sports Haiti S.A.	Registered in 2009
20.	Palm Apparel S.A.	Registered in 2009
21.	Premium Apparel S.A.	Registered in 2009
22.	Quality Sewing MFG. S.A.	Registered in 2009
23.	Sewing International S.A.	Registered in 2009
24.	Seed Apparel S.A.	Registered in 2015 (not yet assessed; has not started operations yet)
25.	The Little Haitian Factory S.A.	Registered in 2014 (not yet assessed)
26.	S&H Global S.A.	Registered in 2012
27.	The Willbes Haitian II S.A.	Registered in 2010
28.	The Willbes Haitian III S.A.	Registered in 2010
29.	Val D'Or Apparel MFG Haiti S.A. ⁷	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). 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 comprised by several questions;
- details on the non-compliance identified by EAs: the information included in this column constitutes the issues where evidence of non-compliance was found in the last assessment conducted by Better Work at each particular factory;
- improvement priorities identified by the factory;
- efforts made by the factory to remedy the compliance needs as verified in the most recent assessment visit;

⁷ Data for this factory is not included in Section 5.2 of this report.

- 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 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:	1592
Date of registration:	9-Sep-09

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

Advisory and Training Services

Date	Activity
21-Aug-14	Management Intro Meeting
13-Oct-14	Meeting with management on progress made and IP follow up.
20-Oct-14	Training on chemicals management organized by IDB.
25-Oct-14	OSH training for 16 workers during the OSH event at SONAPI
16-Jan-15	Meeting with management on non-compliance points related to compensation and floor tour of the two new buildings
19 fev 2015	Meeting with management on PICC operations and emergency preparedness issues

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															
Compensation	Method of Payment															
	Minimum Wage															
	Overtime Wages															
	Paid Leave															
	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				
Contracts and Human Resources	Social Security and Other Benefits	☐	☒	☐	☐	☐	☐	☐	☐	☐	☐			Workers are paid the annual salary supplement according to the law.	
	Wage Information, Use and Deduction	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Contracting Procedures	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Dialogue, Discipline and Disputes	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Employment Contracts	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐				
Occupational Safety and Health	Termination	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Chemicals and Hazardous Substances	☒	☐	☐	☐	☒	☐	☒	☐	☐	☐				
	Emergency Preparedness	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	Number of emergency exits. Ensure there are at least 2 exits per building.			12
												Fire detection and alarm system. All buildings need to have a fire detection and alarm system.			
												Marking or posting of emergency exits and/or escape routes in the workplace. Emergency exits and escape routes need to be marked and posted.			
	Health Services and First Aid	☒	☐	☐	☐	☐	☐	☒	☒	☐	☐			There is sufficient onsite medical facilities and staff at the workplace.	
	OSH Management Systems	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐			Workers receive the required periodic medical checks.	
	Welfare Facilities	☒	☐	☐	☐	☐	☒	☒	☒	☒	☒	Toilets. Ensure that the number of toilets is compliant with the law.			24
	Worker Accommodation	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐			Workplace temperature is acceptable as it is maintained below 30 C.	42
	Working Environment	☒	☐	☒	☐	☐	☐	☐	☐	☐	☐	Workplace lighting. Ensure that workplace lighting is at the minimum required level.			
	Worker Protection	☒	☐	☒	☐	☒	☒	☐	☐	☒	☒	Installing guards on all dangerous moving parts of machines and equipment. Install guards on dangerous moving parts of machines.			6

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	Leave	☐	☐	☒	☐	☐	☐	☐	☐	☐	☐				
	Overtime	☒	☐	☐	☐	☒	☐	☐	☐	☒	☐			The company requested authorization prior to working overtime.	
	Regular Hours	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐				

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

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

CODEVI

Location: Ouanaminthe
Number of workers: 5721
Date of registration: 24-Sep-09

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

Advisory and Training Services

Date	Activity
23-Feb-15	Training on maternity protection.
24-Feb-15	Management intro meeting with the park administrator. Meeting with FW1 general manager to discuss the implementation of the PICC. Meeting with SOKOWA union president to discuss the implementation of the PICC. Meeting with SOFEZO union president to discuss the implementation of the PICC.
25-Feb-15	Meeting with the Compliance Manager to discuss the issues of the previous assessment report and the training needs.
26-Feb-15	Training for workers and managers on negotiations skills (Day 1). Meeting with management representatives for the PICC at FW1 to present the PICC. Meeting with the compliance assistant to discuss the OSH issues for the plant and the new daycare facility. Factory tour.
27-Feb-15	Training for workers and managers on negotiations skills (Day 2).
28-Feb-15	Supervisory Skills Training day 1
1-Mar-15	Supervisory Skill Training day 2

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	○	●	●	●	●	◐	●	●	●	●	Implementation of collective agreement.	Correctly apply the collective bargaining agreement.		48
	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				
Compensation	Overtime Wages	●	○	●	●	○	○	○	○	●	○	Payment for overtime worked at night. Payment for overtime hours worked weekly rest day.	Overtime hours completed at night must be paid 100% above the normal wage. Overtime hours worked on weekly rest day must be paid 100% above the normal wage.	Ordinary overtime is correctly paid.	6
	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.	
	Social Security and Other Benefits	○	●	○	●	●	●	●	●	●	○	Employer contribution to OFATMA for work-related accident insurance.	Forward employers' contribution to ONA on time.	The employer paid employer contributions to ONA on time. The employer forward workers' contributions for social insurance funds to ONA on time.	36
	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.	
												Washing facilities or cleansing materials in the event of chemical exposure. Chemical safety data sheets for all chemicals and hazardous substances in the workplace. Storage of chemicals and hazardous substances.	Install eye wash stations in all areas where chemicals are stored or in use. Provide MSDS for all chemicals and hazardous substances used in the workplace. Ensure that storage of chemicals and hazardous substances is adequate.		54
	Chemicals and Hazardous Substances	●	●	●	●	●	●	●	●	●	●			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		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.	
	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.		
												Pre-assignment and/or annual medical checks for workers.	Provide pre-assignment and annual medical checks for 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				
Welfare Facilities												Toilets.	Provide the amount of toilets required by the Haitian Labour Code.		54
												Eating area.	Provide seats for all the workers during lunch time.		
														The factory provided washing facilities and soap.	
	Worker Accommodation													The temperature level in the workplace is acceptable.	42
Working Environment														The noise levels in the workplace is acceptable.	
														The light level in the workplace is acceptable.	
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.		
												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.		
													The factory safely maintained and isolated all electrical wires and installations 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				
Working Time	Leave	○	○	○	○	●	●	○	●	○	●	Time off for annual leave.	Provide time off for annual leave according to the law.		
												Limits on overtime hours worked.	Comply with limits on overtime hours worked.		42
	Overtime	●	○	●	●	●	○	●	○	●	●	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 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: 1613
Date of registration: 9-Oct-09

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

Advisory and Training Services

Date	Activity
10-Sep-14	Meeting with the OSH Committee in order to present the internal OSH assessment checklist.
29-Sep-14	Follow up on the improvement and training plans. Factory tour with the HR Manager.
5-Dec-14	Advisory visit on industrial relations issues.
15-Jan-15	Management Intro 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	○	○	○	○	○	○	○	○	○	●	Age verification system	Ensure that the factory has a reliable age verification system.		
	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	○	○	○	○	○	○	○	○	○	○			All demoted union members were reinstated in their initial position.	
	Interference and Discrimination	○	○	○	○	○	○	○	○	●	○			The factory reinstated all eligible workers who were terminated for joining a union or engaging in union activity.	
	Strikes	○	○	○	○	○	○	○	○	○	○				
	Union Operations	●	○	○	○	○	○	○	○	○	○				
	Method of Payment	○	○	○	○	○	○	○	○	○	○				
	Minimum Wages	○	○	○	○	○	○	○	○	○	○				
	Overtime Wages	●	○	○	○	○	○	○	○	○	○				
	Paid Leave	●	○	○	○	○	○	○	○	○	○			The factory correctly pays weekly rest days to all eligible 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				
Compensation	Premium Pay	○	○	○	○	○	○	○	○	○	○	Employer contribution to OFATMA for work related accident insurance.	Pay the employer contribution to OFATMA for work related accident insurance.		
	Social Security and Other Benefits	●	●	●	○	●	●	●	●	●	●	Employer contribution to ONA. Forwarding of workers' contributions for social insurance funds to ONA.	Pay employer contribution to ONA. Forward workers' contributions for social insurance funds to ONA.		30
												Payment of annual salary supplement or bonus.	Pay the annual salary supplement or bonus.		
	Wage Information, Use and Deduction	●	○	○	○	○	○	●	○	○	●	Payroll records.	Keep one accurate payroll record.		
	Contracting Procedures	○	○	○	○	○	○	○	○	○	○	Disciplinary measures.	Ensure that disciplinary measures comply with the law.		
	Dialogue, Discipline and Disputes	○	○	○	○	●	●	●	●	●	●	Bullying, harassment or humiliating treatment of workers.	Ensure that workers are not bullied, harassed or humiliated.	The factory registered some supervisors to the supervisory skills training organized by Better Work. Also, the employer took severe disciplinary actions against managers involved in bullying, harassment or humiliating treatment of workers.	30
	Employment Contracts	○	●	●	○	○	○	○	○	○	●	Contracts for all persons performing work for the factory.	Provide contracts for all persons performing work for 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				
Contracts and Human Resources												Reasons for termination.	Provide valid reasons for termination.		
												Opportunity for workers to defend themselves before termination based on conduct or performance.	Offer opportunity for workers to defend themselves before termination based on conduct or performance.		
	Termination	●	○	○	●	●	●	○	○	●	○			Appropriate notice of termination was provided to workers.	6
														Adequate notice was sent to MAST when reducing workforce size due to changes in operations.	
														Adequate notice was sent to MAST when suspending workers due to lack of materials, force majeure, or accident resulting in an immediate work stoppage.	
	Chemicals and Hazardous Substances	●	●	○	○	●	●	○	○	○	○			The factory assesses, monitors, prevents and/or limits workers' exposure to hazardous substances.	
														The factory trained 10 percent of workers to use the firefighting equipment.	
	Emergency Preparedness	●	○	○	●	○	○	●	○	○	○			The employer ensures that all emergency exits are kept accessible, unobstructed, and/or unlocked during working hours, including overtime.	
														The employer installed appropriate fire detection and alarm system.	

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.	The employer provides health checks for workers who are exposed to work-related hazards.	48
	OSH Management Systems	●	●	●	●	○	○	○	○	●	●	Pre-assignment and/or annual medical checks for workers. Assessment of general occupational safety and health issues in the factory.	Provide pre-assignment and/or annual medical checks for workers. Perform regular assessment of general occupational safety and health issues in the factory.		12
	Welfare Facilities											Washing facilities and/or soap.	Provide adequate washing facilities and/or soap.		54
												Providing drinking water.	Provide drinking water.		
												Workplace cleanliness.	Ensure that the workplace is kept clean and tidy.		
												Toilets.	Increase the number of toilets and repair the ones that are malfunctioning.		
	Worker Accommodation											Eating area.	Provide an adequate eating area.		42
												Working Environment	Reduce the workplace temperature.		
	Working Environment	●	○	●	●	●	●	●	●	●	●	Workplace temperature.	Reduce the workplace temperature.	The workplace noise levels is acceptable.	42
												Workplace lighting.	Increase the workplace lighting.		

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
												Training and encouragement of workers to use the personal protective equipment provided.	Train and encourage workers to use the personal protective equipment provided.		
												Chairs with backrests.	Accommodate standing workers properly.		
		●	●	●	●	●	●	●	●	●	●	Installing, grounding, and/or maintaining electrical wires, switches, and/or plugs.	Provide all workers with chairs with backrests.		
Working Time												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.	Standing workers are properly accommodated.	6
												Time off for breastfeeding breaks.	Provide time off for breastfeeding breaks to all eligible workers.		
		●	●	●	●	●	●	●	●	●	●	Time off for annual leave.	Provide time off for annual leave to all eligible workers.		
Overtime												Authorization from the Department of Labour for overtime.	Request authorization from the Department of Labour for overtime.	The employer ensures that overtime is voluntary.	6
		●	●	●	●	●	●	●	●	●	●	Authorization from the Department of Labour for work on Sundays.	Request authorization from the Department of Labour for work on Sundays.		
Regular 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				

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

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

Fairway Apparel S.A.

Location:	Port-au-Prince
Number of workers:	420
Date of registration:	22-Oct-10

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

Advisory and Training Services

Date	Activity
12-Sep-14	Follow up visit with factory manager on the actions taken to remediate to non-compliance issues as planned. Discussion on the establishment of the PICC.
16-Sep-14	Industrial Relations intervention with workers and unions.
17-Sep-14	IR intervention to facilitate discussion between workers representatives and management to resume work after a strike.
15-Oct-14	Workers Training on HIV Aids.
5-Nov-14	Factory visit. Discussion with factory manager and HR manager on IR and dialogue.
29-Jan-15	Meeting with management to discuss the last assessment findings. Discussion on IR issues between management and unions.

[illegible]

Compliance cluster	Compliance point	Assessment									Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9				
Compensation											Employer contribution to ONA.	Regularize back payment for employer's contribution and make ongoing monthly payment to ONA on time.		36
	Social Security and Other Benefits	●	○	●	○	●	○	●	○	●	Forwarding of workers' contributions for social insurance funds to ONA.	Regularize back payment for worker's contribution and make ongoing monthly payment to ONA on time.		
	Wage Information, Use and Deduction	●	○	○	○	○	○	○	○	○			The factory has accurately reported working hours to ensure consistency between payroll and attendance records.	
Contracts and Human Resources	Contracting Procedures	○	○	○	○	○	○	○	○	○				
	Dialogue, Discipline and Disputes	○	○	●	○	○	○	●	●	●	Bullying, harassment or humiliating treatment of workers.	Ensure that no worker is subjected to bullying or humiliating treatment in the workplace.		12
	Employment Contracts	●	○	●	●	○	○	○	○	○				
	Termination	●	○	●	●	●	○	○	○	○				
Occupational Safety and Health	Chemicals and Hazardous Substances	●	●	○	○	●	○	○	○	○				
	Emergency Preparedness	○	●	●	●	○	○	○	○	○			Fire alarm and smoke detectors were installed in the cutting building.	
	Health Services and First Aid	●	●	○	●	○	○	○	○	○	Onsite medical facilities and staff.	The factory needs to hire one additional nurse to meet the labour law requirements with regards to the number of workers at the workplace.		48
	OSH Management Systems	●	●	●	●	○	○	○	○	○				
											Toilets.	Provide the quantity of toilets required by the Haitian Labour code.		48
Occupational Safety and Health	Welfare Facilities	●	●	●	●	○	●	●	●	●	Workplace cleanliness.	Ensure the workplace remains clean.		
											Eating area.	Improve the conditions of the eating area to properly accommodate the workers.		

Compliance cluster	Compliance point	Assessment									Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9				
	Worker Accommodation	○	○	○	○	○	○	○	○	○				
	Working Environment	○	●	○	●	●	●	●	●	●	Workplace lighting.	Increase the lighting levels in the workplace.		30
											Installing guards on all dangerous moving parts of machines and equipment.	Install guards on all dangerous moving parts of machines and equipment.		12
	Worker Protection	●	●	●	●	◐	○	●	●	●	Measures to avoid heavy lifting by workers.	Provide back support to workers subjected to heavy lifting.		
Working Time	Leave	○	○	●	●	●	○	○	○	○				
	Overtime	●	●	◐	●	○	○	○	○	●	Limits on overtime hours worked.	Comply with the limit of 80 hours of overtime within a three months period.		
	Regular Hours	●	●	●	●	●	○	○	○	○				

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

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

Fox River

Location:	Port-au-Prince
Number of workers:	31
Date of registration:	29-Sep-09

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

Advisory and Training Services

Date	Activity
------	----------

17-Jul-14	Meeting with management concerning the re-opening of the factory and improvement activities.
3-Dec-14	Management intro meeting, advisory on chemicals storage, and discussion on the factory's punching system.

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												
Freedom of Association and Collective Bargaining	Collective Bargaining												
	Interference and Discrimination												
	Strikes												
	Union Operations												
	Method of Payment												
	Minimum Wage												
	Overtime Wages												
	Paid Leave												
	Premium Pay												

Compliance cluster	Compliance point	Assessment								Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8				
Compensation	Social Security and Other Benefits	●	●	○	○	○	●	◐	○			The employer forwards workers' contribution for social insurance funds to ONA	
												The employer pays its contribution to ONA on time.	
	Wage Information, Use and Deduction	●	○	○	○	○	○	○	○				
Contracts and Human Resources	Contracting Procedures	○	○	○	○	○	○	○	○				
	Dialogue, Discipline and Disputes	○	○	○	○	○	○	○	○				
	Employment Contracts	●	●	◐	○	○	○	○	○				
	Termination	●	○	○	●	○	○	●	○			The factory complies with Haitian labour law when terminating workers.	
										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
										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.		
	Chemicals and Hazardous Substances	●	◐	○	○	○	○	●	◐			The factory keeps an inventory of all chemicals and hazardous substances used in the workplace.	
												All 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				
Occupational Safety and Health	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.		6
										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
	Health Services and First Aid	●	◐	◐	◐	◐	●	●	◐			The factory comply with le legal requirements regarding health checks for workers who have been exposed to work related hazards.	
												The factory has 10% of workers trained in first-aid procedures.	
												The factory comply with le legal requirements regarding pre-assignment and/or annual medical checks for workers.	

Compliance cluster	Compliance point	Assessment								Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8				
										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
	OSH Management Systems	●	◐	◐	◐	○	◐	●	◐	Assessment of general occupational safety and health issues in the factory	Regularly conduct an OSH assessment in the factory.	The factory develop mechanisms to ensure cooperation between workers and management on OSH matters.	
										Washing facilities and/or soap	The factory must ensure availability of soap at all time in the workplace during working hours.		6
	Welfare Facilities	●	◐	○	○	○	○	○	●			The number of toilets is compliant with the law.	
												The factory has an adequate eating area.	
	Worker Accommodation	○	○	○	○	○	○	○	○				
	Working Environment	●	○	○	●	○	○	○	○				

Compliance cluster	Compliance point	Assessment								Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8				
	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.	Install proper guards on all dangerous moving parts of machines and equipment. Ensure all electrical wires, switches, and/or plugs are well maintained.	42
Working Time	Leave	○	○	◐	●	○	●	○	○				
	Overtime	○	●	○	○	○	○	○	○				
	Regular Hours	●	●	●	◐	◐	○	○	●	Working time records.	Keep adequate working time records.		

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

Apr-15
54%

Genesis S.A.

Location:	Port-au-Prince
Number of workers:	835
Date of registration:	28-Oct-09

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

Advisory and Training Services

Date	Activity
29-Sep-14	Management Intro meeting.
15-Sep-14	Meeting with Management regarding training to be conducted at sister company.
10-Oct-14	Meeting with Management to evaluate progress made based on improvement plan.
15-Jan-15	Meeting with management on new issues found in latest report.
5-Feb-15	Meeting with Compliance manager on issues found in last assessment.
19-Feb-15	Advisory service with management.

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													
	Overtime Wages							Payment for overtime worked at night.	Pay correctly for overtime worked at night.					
	Paid Leave			Payment for annual leave.	Pay correctly for annual leave.									

Compliance cluster	Compliance point	Assessment									Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9				
Compensation	Premium Pay	○	○	○	○	○	○	○	○	○	Employer contribution to ONA. Pay employer contribution to ONA as required by law.	Pay employer contribution to ONA as required by law.		
	Social Security and Other Benefits	●	●	●	◐	◐	◐	○	○	●				
	Wage Information, Use and Deduction	○	○	○	○	○	●	○	○	○				
Contracts and Human Resources	Contracting Procedures	○	○	○	○	○	○	○	○	○				
	Dialogue, Discipline and Disputes	○	○	○	○	○	○	○	○	○				
	Employment Contracts	●	●	○	○	○	○	○	○	○				
	Termination	○	○	○	○	○	●	○	○	○				
Occupational Safety and Health	Chemicals and Hazardous Substances	●	◐	○	●	◐	◐	○	●	○	Firefighting equipment. Marking or posting of emergency exits and/or escape routes in the workplace. Onsite medical facilities and staff. Toilets.	Ensure that there are adequate fire fighting equipment . Ensure that exits are marked and posted in the workplace. Ensure that the factory is compliant with the number of nurses and doctor visits required. Ensure that the number of toilets is compliant with the law.	The factory put a system in place to ensure that all containers of chemical products are properly labeled.	6
	Emergency Preparedness	●	◐	●	●	◐	◐	○	●	●				
	Health Services and First Aid	●	●	●	◐	◐	◐	○	◐	◐				
	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	7	8	9				
											Workplace lighting.	Improve lighting in the workplace.		18
	Working Environment	●	○	●	○	○	●	●	●	●			Noise levels are compliant with the limit of 90 dB. The temperature in the workplace is acceptable.	
	Worker Protection	●	●	●	●	●	●	○	○	○				
	Leave	○	○	○	○	○	○	○	○	○				
Working Time	Overtime	●	●	●	●	●	●	○	○	○	Limits of overtime hours worked.	Ensure that the factory is compliant with the limit of overtime hours allowed by law.		
	Regular Hours	●	●	○	○	○	●	○	○	○				

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

Oct-13	Apr-14	Oct-14	Apr-15
7%	7%	20%	47%

Global Manufacturers & Contractors S.A.

Location: Port-au-Prince
 Number of workers: 1921
 Date of registration: 19-Sep-10

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

Advisory and Training Services

Date	Activity
16-Sep-14	Training of OSH Committee
10-Oct-14	Follow up on the improvement plan. Factory tour with the Compliance Manager.
12, 13 & 14-Nov-14	Supervisory skills training
29-Jan-15	Management Intro 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.	
	Paid Leave	○	○	○	○	●	○	●	○	●		Payment for annual leave.	Pay correctly for annual leave.	
	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				
Compensation											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.		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.		
											Fire detection and alarm system.	Install adequate fire detection and alarm system.		

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.	Ensure that the number of onsite medical staff in the workplace is in line with the requirements of the law.		48
		●	●	◐	◐	◐	●	◐	◐	●	First aid boxes/supplies in the workplace.	Ensure that there accessible first aid boxes in the workplace.		
											Pre-assignment and/or annual medical checks for workers.	Provide re-assignment and/or annual medical checks for workers.		
	OSH Management Systems	●	●	○	●	○	●	◐	●	○			The employer conduct a self assessment of OSH issues in the workplace.	
	Welfare Facilities										Toilets.	Ensure that there are sufficient toilets in the workplace.		48
		●	◐	●	●	●	◐	◐	●	◐			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.	The employer trained and/or encouraged workers to use the personal protective equipment provided.	48
											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.		
	Leave	●	●	●	○	○	●	●	●	○			The employer provide time off to eligible workers for breastfeeding breaks.	
Working Time	Overtime	●	●	●	●	●	●	●	●	●	Limits on overtime hours worked.	Limit overtime hours to less than 80 in 13 weeks.		48
											Authorisation from the Department of Labour for overtime.	Request authorization from MAST before working overtime.		
	Regular Hours	●	●	○	●	○	○	○	○	○				

Percentage of piece rate workers earning 300 Gourdes 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: 868
Date of registration: 20-Jan-14

- ☒ Factory was found non-compliant.
- ☐ Factory was progressing
- ☐ Factory was compliant.

Advisory and Training Services

Date	Activity
11-Aug-14	Management intro-meeting with general manager and compliance team. Introduction of the improvement plan. PICC presentation. Factory tour.
3-Oct-14	Meeting with compliance and HR manager to follow up on the improvement plan.
6-Oct-14	Observation of mediation meeting between ombudsman, factory manager and union federation representative concerning the reinstatement of one union member.
16-Oct-14	Meeting with compliance and HR manager to follow up on the improvement plan and review the termination process.
29-Jan-15	Meeting with compliance and HR manager to discuss the last assessment findings and improvement plan.

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	☐	☐			
	Prison Labour	☐	☐			
Freedom of Association and Collective Bargaining	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	☐	☐			

Compliance cluster	Compliance point	Assessment	Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1 2				
Contracts and Human Resources	Contracting Procedures	☐ ☐				
	Dialogue, Discipline and Disputes	☒ ☐			Disciplinary measures have been applied in accordance to internal work rules and workers performance and conduct. The factory has adressed the issue of verbal abuse towards workers.	
	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 temination.		
	Chemicals and Hazardous Substances	☐ ☒	Storage of chemicals and hazardous substances.	Properly store all chemicals and hazardous substances to avoid contamination and spills.		
Occupational Safety and Health	Emergency Preparedness	☐ ☒	Storage of flammable materials	Properly store all flammable materials.		
			Onsite medical facilities and staff.	Hire three additional nurses to meet law requirements with regards to the number of workers at the workplace.		6
	Health Services and First Aid	☒ ☐			The factory has arranged pre-assignment medical checks for new workers.	
	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

Compliance cluster	Compliance point	Assessment	Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1 2				
Occupational Safety and Health			Washing facilities and/or soap.	Provide soap at the factory at all time during working hours.		6
	Welfare Facilities	● ●			The factory has installed additional toilets to meet law requirements. The factory has installed additional seats to accommodate more workers in the eating areas.	
	Worker Accommodation	○ ○			The factory has taken measures to lower the temperature levels.	
	Working Environment	○ ○			The factory has provided hearing protection for workers in areas of excessive noise levels.	
	Worker Protection	○ ○				
	Leave	○ ●	Time off for breastfeeding breaks.	Provide paid breastfeeding breaks to nursing workers who are eligible to this benefit.		
	Overtime	○ ○				
Working Time	Regular Hours	○ ●	Working time records.	Ensure time records reflect actual working hours.		

Percentage of piece rate workers earning 300 Gourdes 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: 401
Date of registration: 25-Aug-10

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

Advisory and Training Services

Date	Activity
25-Sep-14	PICC Meeting
28-Sep-14	Supervisory skills training
20-Oct-14	Participation in a training on chemical management provided by Better Work in cooperation with IDB
30-Oct-14	PICC Meeting
27-Nov-14	PICC Meeting
3-Dec-14	Management intro Meeting
11-Feb-15	Introduction of new Advisor and follow up on advisory on improvement of lux level.

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	○	○	○	○	○	○	○	●	○			The factory's supervisors underwent a training on sexual harassment and on supervisory skills and signed a policy against sexual harassment.	
	Race and Origin	○	○	○	○	○	○	○	○	○				
	Religion and Political Opinion	○	○	○	○	○	○	○	○	○				
	Bonded Labour	○	○	○	○	○	○	○	○	○				
Forced 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				
Compensation	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	☐	☐	☐	☐	☐	☐	☐	☒	☐			The factory provides advanced notice to MAST before reducing the size of the workforce.	
Occupational Safety and Health	Chemicals and Hazardous Substances	☐	☒	☒	☐	☐	☒	☐	☒	☐			The factory implemented a system for daily inspection and quick replacement of used eye wash bottles.	
	Emergency Preparedness	☐	☒	☐	☒	☐	☒	☐	☐	☐			The factory posted all MSDS in areas where chemicals are being use.	
	Health Services and First Aid	☒	☐	☒	☐	☒	☒	☐	☒	☐			The factory signed a new contract with the doctor to provide 3 visits per week as required by the law.	
	OSH Management Systems	☒	☐	☐	☐	☐	☐	☐	☐	☐			The factory reduced the access time to first aid boxes in case of emergency by removing the locks.	

Compliance cluster	Compliance point	Assessment									Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9				
Working Time	Welfare Facilities	●	◐	◐	○	○	●	○	●	○			The factory set up a stock of soap in the toilet cabinets for quick replacement.	
	Worker Accommodation	○	○	○	○	○	○	○	○	○	Workplace lighting	Increase lighting in the workplace.		18
	Working Environment	○	●	○	●	○	●	●	◐	◐			The noise level has been decreased. The factory installed new windows on the side of the building to increase the air flow.	
	Worker Protection	○	●	◐	◐	○	●	○	○	○				
	Leave	○	●	○	○	○	○	○	●	○			The factory implemented a new policy on breastfeeding break for workers entitled to it.	
	Overtime	●	○	●	◐	○	○	○	●	○			The factory requested MAST approval for overtime work.	
	Regular Hours	●	◐	●	○	○	○	○	○	○				

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

Oct-13	Apr-14	Oct-14	Apr-15
41%	37%	65%	65%

Indigo Mountain Haiti S.A.

Location: Port-au-Prince
Number of workers: 227
Date of registration: 15-Mar-12

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

Advisory and Training Services

Date	Activity
03-Sep-14	Meeting with management on progress made on the improvement plan.
10-Sep-14	Meeting with management to assess progress made on OSH.
29-Sep-14	Meeting with management to discuss training plan.
30-Jan-15	Meeting with HR manager to discuss the findings from last assessment and improvement plan.

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	○	○	○	○	○	○				
	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	●	○	○	○	○	○				
	Minimum Wage	○	○	○	○	○	○				
	Overtime Wages	●	●	○	○	○	○				

Compliance cluster	Compliance point	Assessment						Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6				
Compensation	Paid Leave	●	●	○	○	○	●	Payment for weekly rest days.	Provide payment for rest day to all eligible workers.		
								Payment for annual leave.	Provide adequate payment for annual leave.		
	Premium Pay	○	○	○	○	○	○				
								Employer contribution to ONA.	Forward employer's contribution to ONA on time.		
	Social Security and Other Benefits	●	◐	●	○	○	●	Payment of annual salary supplement or bonus.	Provide adequate payment for annual salary supplement or bonus.		
								Forwarding of workers' contributions for social insurance funds to ONA.	Forward worker's contribution to ONA on time.		
Contracts and Human Resources	Wage Information, Use and Deduction	●	●	○	○	○	○				
	Contracting Procedures	○	○	○	○	○	○				
	Dialogue, Discipline and Disputes	○	○	●	●	○	○				
	Employment Contracts	○	○	○	○	○	●	Internal work rules.	Submit internal work rules to MAST for approval.		
								Reasons for termination.	Specify reasons for termination in workers' files.		
	Termination	○	●	○	●	○	●	Annual salary supplement or bonus upon termination.	Provide adequate payment for annual salary supplement or bonus to terminated workers.		

Compliance cluster	Compliance point	Assessment						Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6				
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.		18
								Labeling of chemicals and hazardous substances.	Label all secondary containers of chemicals.		
								Assessing, monitoring, preventing and/or limiting workers' exposure to hazardous substances.	Assess and monitor workers exposure to hazardous substances.		
								Training workers who work with chemicals and hazardous substances.	Train workers who work with chemicals and hazardous substances.		
								Washing facilities or cleansing materials in the event of chemical exposure.	Install eye wash stations in the workplace.		
								Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Display MSDS for all chemicals used in the workplace.		
Emergency Preparedness										All chemicals used in the workplace are properly stored.	
								Firefighting equipment.	Ensure that all fire-fighting equipment are regularly inspected and well maintained.		12
										All emergency exits are kept accessible, unobstructed, and/or unlocked during working hours, including overtime.	
										The factory conducted	

Compliance cluster	Compliance point	Assessment						Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6				
Occupational Safety and Health	Health Services and First Aid							Onsite medical facilities and staff.	Ensure that the factory has a sufficient number of onsite medical staff.		30
		●	◐	●	◐	●	●	Pre-assignment and/or annual medical checks for workers.	Ensure that workers receive the appropriate medical checks.		
								Health checks for workers who are exposed to work-related hazards.	Provide medicals checks twice a year for workers in chemicals.		
	OSH Management Systems							Written OSH policy.	Elaborate a written OSH policy and post it in the workplace.		30
		●	●	◐	●	●	◐	Assessment of general occupational safety and health issues in the factory.	Conduct self assessment on OSH on a regular basis at the factory.	The factory records and submit monthly work-related accidents reports to OFATMA.	
	Welfare Facilities							Washing facilities and/or soap.	Ensure that soap is available for the workers.		30
		●	●	●	●	●	●	Providing drinking water.	Provide clean and safe drinking water.		
								Toilets.	Ensure that sufficient toilets are available in the workplace.		
	Worker Accommodation							Eating area.	Provide an adequate eating area for workers.		
		○	○	○	○	○	○				
	Working Environment	●	●	○	●	◐	●	Workplace temperature.	Ensure that temperature in the workplace is acceptable.		12
								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				
	Worker Protection	●	●	●	●	●	●	Providing workers with personal protective clothing and equipment. Training and encouragement of workers to use the personal protective equipment provided. Accommodating standing workers. Posting safety warnings in the workplace. Training of workers to use machines and equipment safely.	Provide workers with the appropriate PPE. Train and encourage workers to use their PPEs. Ensure that all standing workers are properly accommodated. Post safety warnings in generators and fuel tank area. Train workers to use machines and equipment safely.		30
Working Time	Leave	●	●	○	○	○	○				
	Overtime	●	●	○	○	○	○				
	Regular Hours	○	●	○	○	○	○				

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

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

Industrial Revolution II Haiti S.A.

Location: Port-au-Prince
Number of workers: 173
Date of registration: 14-Jan-14

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

Advisory and Training Services

19-Aug-14 Management Intro meeting.
 28-Aug-14 Meeting with management on OSH non compliances.
 29-Aug-14 Meeting with Management on progress made and impact study follow up.
 29-Sep-14 Meeting with Management to discuss the training plan.
 27-Jan-15 Meeting with management to folow up with the improvement plan.
 19-Feb-15 Meeting with Management on compensation issues.

Compliance cluster	Compliance point	Assessment		Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2				
Child Labour	Child Labourers	○	○				
	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 1 2	Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
Compensation	Minimum Wage	☐ ☐				
	Overtime Wages	☐ ☐				
	Paid Leave	☐ ☒	Payment for legally mandated holidays. Payment for weekly rest days.	Pay legally mandated holidays as required by the law. Pay weekly rest days as required by the law.		
	Premium Pay	☐ ☐				
			Employer Contribution to ONA.	Pay employer Contribution to ONA on time.		6
	Social Security and Other Benefits	☒ ☐	Forwarding of workers' contribution for social insurance funds to ONA.	Forward workers' contribution for social insurance funds to ONA on time.	The employer paid its contribution to OFATMA for work related accidents insurance.	
Contracts and Human Resources	Wage Information, Use and	☐ ☐				
	Contracting Procedures	☐ ☐				
	Dialogue, Discipline and Disputes	☐ ☐				
	Employment Contracts	☒ ☐			The factory elaborated internal work rules as required by law.	
	Termination	☐ ☐				

Compliance cluster	Compliance point	Assessment 1 2	Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
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.		
			Assessing, monitoring, preventing and/or limiting workers' exposure to hazardous substances.	Assess, monitor, prevent and/or limit workers' exposure to hazardous substances.		
			Training workers who work with chemicals and hazardous substances.	Train workers who work with 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.		
			Storage of chemicals and hazardous substances.	Ensure that all chemicals and hazardous substances are properly stored.		
			Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Ensure that MSDS's are available for the chemicals used in the workplace.		

Compliance cluster	Compliance point	Assessment 1 2	Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
Occupational Safety and Health	Emergency Preparedness	● ●	Storage of flammable materials.	Ensure that all flammable materials are correctly stored.		6
			Fire detection and alarm system.	Install adequate fire detection and alarm system in the warehouse.		
			Firefighting equipment.	Install adequate firefighting equipment in the warehouse.		
					The factory posted evacuation plan in the workplace.	
	Health Services and First Aid	● ●	First aid boxes/supplies in the workplace.	Ensure that adequate first aid boxes/supplies are available in the workplace.		
					The factory has the required medical facilities and staff.	
	OSH Management Systems	● ●	Assessment of general occupational safety and health issues in the factory.	Conduct periodic self-assessments of general occupational safety and health issues in the factory.		6
			Mechanisms to ensure cooperation between workers and management on OSH matters.	Have a system in place to ensure cooperation between workers and management on OSH matters.		
	Welfare Facilities	○ ●	Washing facilities and/or soap.	Provide washing facilities and/or soap.		
	Worker Accommodation	○ ○				

Compliance cluster	Compliance point	Assessment 1 2	Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
	Working Environment	● ●	Workplace temperature.	Reduce workplace temperature.		6
			Workplace lighting.	Increase light level in the workplace.		
	Worker Protection	● ○	Providing workers with personal protective clothing and equipment.	Provide workers with personal protective clothing and equipment.		6
			Training and encouragement of workers to use the personal protective clothing and equipment provided.	Train and encourage workers to use the personal protective clothing and equipment provided.		
			Training and encouragement of workers to use machines and equipment safely.	Train and encourage workers to use machines and equipment safely.	Standing workers are properly ccomodated. Workers are provided with chairs with backrests. Required safety warnings are posted in the workplace.	
Working Time	Leave	○ ○				
	Overtime	○ ○				
	Regular Hours	○ ○				

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

Oct-14	Apr-15
26%	22%

Compliance cluster	Compliance point	Assessment	Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1 2				

Interamerican Wovens S.A.

Location: Port-au-Prince
Number of workers: 714
Date of registration: 28-Oct-09

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

Advisory and Training Services

Date	Activity
2-Oct-14	Follow up visit on improvement plan
19-Jan-15	Management Intro Meeting
30-Jan-15	PICC info session to workers from 6 modules
5-Feb-15	Meeting with Compliance Manager on OSH management systems
11-Feb-15	Meeting with the OSH committee

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 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	○	○	○	○	○	○	○	○	○				
	Prison Labour	○	○	○	○	○	○	○	○	○				
Freedom of Association and Collective Bargaining	Collective Bargaining	○	○	○	○	○	○	○	○	○				
	Interference and Discrimination	○	○	○	○	○	○	○	○	○				
	Strikes	○	○	○	○	○	○	○	○	○				
	Union Operations	●	○	○	○	○	○	○	○	○				
	Method of Payment	○	○	○	○	○	○	○	○	○				
	Minimum Wage	○	○	○	○	○	○	○	○	○				
	Overtime Wages	○	○	○	○	○	○	○	○	○				
	Paid Leave	○	○	○	●	○	○	○	●	○				
	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				
Compensation											Employer contribution to ONA.	Pay employer contribution to ONA on time.		12
	Social Security and Other Benefits	●	●	●	○	●	○	●	●	●	Collecting workers' contributions to ONA for social insurance funds.	Collect workers' contributions to ONA for social insurance funds.		
											Forwarding of workers' contributions for social insurance funds to ONA.	Forward of workers' contributions for social insurance funds to ONA on time.		
	Wage Information, Use and Deduction	○	●	○	○	○	○	○	○	○				
	Contracting Procedures	○	○	○	○	○	○	○	○	○				
Contracts and Human Resources	Dialogue, Discipline and Disputes	○	○	○	○	●	○	●	○	○				
	Employment Contracts	○	●	●	●	○	○	○	○	○				
	Termination	●	○	○	○	●	○	○	○	○				
Chemicals and Hazardous Substances											Training of workers who work with chemicals and hazardous substances.	Train workers who work with chemicals and hazardous substances.		6
											Washing facilities or cleansing materials in the event of chemical exposure.	Provide adequate washing facilities or cleansing materials in the event of chemical exposure.		
	Chemicals and Hazardous Substances	●	●	●	○	●	○	○	○	●	Labeling of chemicals and hazardous substances	Ensure that all substances are labeled		
											Chemical safety data sheets for all chemicals and hazardous substances in the workplace	Ensure that MSDS's are available for the chemicals used 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				
Occupational Safety and Health	Emergency Preparedness		●	●	○	●	●	○	●	●	Marking or posting of emergency exits and/or escape routes in the workplace.	Ensure that exits and escape routes are marked and posted		6
											Fire detection and alarm system.	Install adequate fire detection and alarm system in the warehouse.		
											Firefighting equipment.	Install adequate firefighting equipment in the warehouse.		
													All possible sources of ignition are properly safeguarded	
	Health Services and First Aid										Onsite medical facilities and staff.	Provide onsite medical facilities and staff as required by law.		48
											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.		
											Health checks for workers who are exposed to work-related hazards.	Provide health checks for workers who are exposed to work-related hazards.		
	OSH Management Systems	●	○	●	○	○	●	○	●	○			The factory has implemented an effective OSH Management system.	
	Welfare Facilities										Toilets.	Increase the number of toilets as required by the law.	The factory took measures to ensure that soap is always available during working hours.	48
											Eating area.	Provide an adequate eating area.		

Compliance cluster	Compliance point	Assessment									Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9				
	Worker Accommodation	○	○	○	○	○	○	○	○	○	Workplace temperature.	Reduce workplace temperature.		18
	Working Environment	○	○	●	●	○	●	◐	●	◐	Workplace lighting	Increase light level in the workplace.	The ventilation was improved in the workplace.	
	Worker Protection	●	◐	●	○	●	◐	●	◐	◐	Accommodating standing workers.	Standing workers need to be accommodated.	Workers are trained to use machines safely.	24
											Posting safety warnings in the workplace.	Appropriate safety warnings need to be posted in the workplace.	Guards were installed on all dangerous moving parts of machines and equipment.	
Working Time	Leave	○	○	●	●	○	○	○	●	○			Workers are now given time off for their breastfeeding break.	
	Overtime	●	○	●	●	◐	●	◐	○	○				
											Working time records.	Ensure that working time records reflect actual working hours.		
	Regular Hours	●	○	●	○	○	○	○	○	●				

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

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

Johan Company

Location: Port-au-Prince
Number of workers: 165
Date of registration: 23-Sep-09

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

Advisory and Training Services

Date	Activity
16-Sep-14	Management Intro meeting.
22-Sep-14	Advisory visit on fire safety.
12-Feb-15	Introduction of new Better Work Enterprise Advisor and Management intro 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	○	○	○	○	○	○	○	○	●	○			The factory pays minimum wage to all full time workers.	
	Overtime Wages	○	○	○	○	○	○	○	○	○	○				
	Paid 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				
Compensation	Premium Pay	☐	☐	☐	☐	☐	☐	☐	☐	☒	☐			The factory pays workers for regular hours worked on holidays.	
												Employer contribution to ONA.	Forward employer's contribution to ONA.		48
												Employer contribution to OFATMA for work-related accident insurance.	Pay work-related accident insurance to OFATMA.		
	Social Security and Other Benefits	☐	☒	☒	☒	☒	☒	☒	☒	☒	☒	Forwarding of workers' contributions for social insurance funds to ONA.	Forward workers' contribution for social insurance funds to ONA.		
														The employer collects required ONA contribution from workers.	
	Wage Information, Use and Deduction	☒	☒	☐	☐	☐	☐	☐	☒	☐	☒	Payroll records.	Keep one accurate payroll showing all the hours worked.		6
Contracts and Human Resources	Contracting Procedures	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Dialogue, Discipline and Disputes	☒	☐	☐	☒	☐	☐	☒	☐	☐	☐				
	Employment Contracts	☒	☒	☒	☒	☒	☒	☒	☒	☒	☒	Internal work rules.	Elaborate internal work rules for the factory and request MAST approval.		54
	Termination	☐	☒	☐	☒	☒	☐	☐	☐	☒	☐			The factory includes valid reasons for termination in workers' files.	
	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				
														The factory received training with the national fire department on firefighting.	54
	Emergency Preparedness	●	●	●	●	●	●	●	●	●	●	Number of emergency exits	The factory needs to have a minimum of 2 emergency exits.		
												Fire detection and alarm system.	Install a fire detection and a alarm system.		
												Marking or posting of emergency exits and/ or escape routes in the workplace.	Post evacuation plan and mark the escape routes in the workplace.		
												Periodic emergency drills.	Perform periodic emergency drills		
												Pre-assignment and/ or annual medical checks for workers.	Provide pre-assignment and/or annual medical check for workers.		54
	Health Services and First Aid	●	●	●	●	●	●	●	●	●	●	On site medical facilities and staff.	Provide the required onsite medical facilities and staff according to the law.		
														The factory is no longer using chemicals.	

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	OSH Management Systems	●	●	◐	●	●	●	●	●	●	●	Assessment of general occupational safety and health issues in the factory.	Conduct periodic self-assessments of general occupational safety and health issues in the factory.		54
												Mechanisms to ensure cooperation between workers and management on OSH matters.	Have a system in place to ensure cooperation between workers and management on OSH matters.		
												Recording work-related accidents and diseases and/or submitting the record to OFATMA.	Record all work-related accidents and diseases and submit the reports to OFATMA.		
												Written OSH policy.	Elaborate a written OSH policy.		
	Welfare Facilities											Washing facilities and/or soap.	Provide washing facilities and/or soap.		54
		●	●	◐	●	●	●	●	●	◐	●	Toilets.	Provide the amount of toilets required by the Haitian Labour Code.		
												Eating area.	Provide an adequate eating area.		
	Worker Accommodation	○	○	○	○	○	○	○	○	○	○				
	Working Environment	○	●	○	○	○	○	○	●	●	◐	Workplace lighting.	Adequately light the workplace.	The temperature in the workplace is acceptable.	12

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											Installing guards on all dangerous moving parts of machines and equipment.	Install guards on all dangerous moving parts of machines and equipment.		54
		●	●	◐	●	●	●	●	◐	◐	●	Posting safety warnings in the workplace.	Post safety warnings in the workplace.		
												Accomodate standing workers.	Ensure that standing workers are properly accomodated.		
Working Time	Leave	○	○	●	●	●	●	●	●	●	●	Time off for breastfeeding breaks.	Provide time off for breastfeeding breaks to all eligible workers.		42
	Overtime	●	●	○	●	○	○	○	●	○	○				
	Regular Hours	●	●	●	●	○	○	○	●	●	●	Working time records	Set up a reliable attendance recording system.		12

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

Oct-13	Apr-14	Oct-14	Apr-14
0%	91%	2%	22%

Modas Bu II S.A.

Location: Port-au-Prince
Number of workers: 1163
Date of registration: 14-Aug-13

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

Advisory and Training Services

Date	Activity
29-Aug-14	PICC information session
3-Sep-14	PICC elections
10-Oct-14	Meeting with management on FOA issue
13-Oct-14	PICC training for Management
14-Nov-14	First preparatory meeting with management on upcoming PICC meetings
11-Dec-14	Second preparatory meeting with management on upcoming PICC meetings
17-Dec-14	PICC meeting
22-Jan-15	Meeting with Management on pending FOA issue
27-Jan-15	Management Intro meeting
30-Jan-15	PICC meeting

Compliance cluster	Compliance point	Details of non-compliance			Improvement Priorities	Remediation Efforts	Months
		1	2	3			
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	○	○	○			
	Freedom to Associate	○	○	●	Freedom to form a union	Allow workers to freely form a union.	
	Union Operations	○	○	○			
	Method of Payment	○	○	○			
	Minimum Wage	○	○	○			

Compliance cluster	Compliance point	Details of non-compliance			Improvement Priorities	Remediation Efforts	Months
		1	2	3			
Compensation	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	☐	☐	☐			
				Reductions in workforce size due to changes in operations.	Inform MAST before workforce reductions.		12
	Termination	☒	☐	☒	Opportunity for workers to defend themselves before termination based on conduct or performance.	Give 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.		12
		☒	☐	☒	Training of workers who work with chemicals and hazardous substances.	Train workers who work with chemicals and hazardous substances.	

Compliance cluster	Compliance point	Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1 2 3			
Occupational Safety and Health	Emergency Preparedness	Fire detection and alarm system.	Ensure that there are functioning fire detection and alarm systems.		12
		Marking or posting of emergency exits and/or escape routes in the workplace.	Ensure that escape routes and exits are clearly marked and posted.		
		● ● ●		Workers are now trained to use firefighting equipment	
	Health Services and First Aid			The factory performed an emergency drill every 6 months	
				The workplace has adequate firefighting equipment	
		Onsite medical facilities and staff.	Ensure that there is a sufficient number of onsite medical staff.		12
Occupational Safety and Health	Health Services and First Aid	Pre-assignment and/or annual medical checks for workers.	Conduct the required medical checks for workers.		
		First-aid training for workers.	Train at least 10% of workforce in first aid.		
		Health checks for workers who are exposed to work related hazards.	Provide health check to workers exposed to work related hazards		
	OSH Management Systems			The factory conducts assessment of general occupational safety and health issues in the factory.	

Compliance cluster	Compliance point	Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1 2 3			
		Toilets.	Ensure that the number of toilets complies with the requirements of the law.		12
	Welfare Facilities	● ● ● Washing facilities and soap	Ensure that there is adequate soap in the workplace.		
	Worker Accommodation	○ ○		The temperature in the workplace is acceptable.	
	Working Environment	● ● ○		The workplace is adequately ventilated.	
		Training and encouragement of workers to use the personal protective equipment provided.	Train and encourage workers to use the personal protective equipment provided.		12
	Worker Protection	● ● ● Training of workers to use machines and equipment safely.	Train workers to use machines and equipment safely.		
		Installing guards on all dangerous moving parts of machines and equipment.	Install guards on all dangerous moving parts of machines and equipment.	Standing workers are properly accommodated.	
	Leave	○ ● ● Time off for breastfeeding breaks.	Provide time off for breastfeeding breaks to all eligible workers.		6
Working Time	Overtime	● ○ ● Authorization from the Department of Labour for overtime.	Request authorization from the Department of Labour before working overtime.		
	Regular Hours	○ ● ○		The factory keeps adequate working time records.	

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

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

MGA Haiti S.A.

Location: Port-au-Prince

Number of workers: 850

Date of registration: 8-Oct-09

● Factory was found non-compliant

● Factory was progressing

☐ No-evidence of non-compliance

Advisory and Training Services

Date	Activity
------	----------

2-Sep-14	Management intro meeting
----------	--------------------------

29-Sep-14 Follow up visit on improvement plan.

14-Nov-14	Follow up visit on improvement plan.
-----------	--------------------------------------

30-Jan-15	Management intro meeting
-----------	--------------------------

[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				
Occupational Safety and Health												Onsite medical facilities and staff.	Comply with the number of medical staff 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.		
												Health checks for workers who are exposed to work-related hazards.	Provide health checks twice a year for workers who are exposed to work-related hazards.		
	OSH Management Systems	●	◐	◐	●	◐	●	◐	◐	◐	◐				
												Toilets.	Provide the number of toilets required by the Haitian Labour code.		54
	Welfare Facilities	●	◐	◐	◐	●	◐	◐	◐	●	◐	Eating area.	Provide an eating area to accommodate the workers.	The factory ensures that enough soap and paper is available in toilets during working hours.	
	Worker Accommodation	◐	◐	◐	◐	◐	◐	◐	◐	◐	◐				
												Workplace temperature.	Reduce the temperature in the workplace.		42
	Working Environment	◐	◐	●	◐	●	◐	◐	◐	◐	◐			The factory improved the light levels.	

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. Chairs with backrests. Installing guards on all dangerous moving parts of machines and equipment	Provide all workers using chemicals and mechanic shop with the appropriate protection equipment. Ensure that all chairs are equipped with back rests. Ensure that all machines and equipment have appropriate guards installed.	The factory equips all standing workstations with fatigue mats or tables with foot rest. The factory ensure that all electrical installations are safely maintained to prevent electrical shocks.	54
		Leave										Limits on overtime hours worked.	Comply with the limit of overtime hours worked set by the law.		
		Overtime										Authorization from the Department of Labour for overtime. Authorization from the Department of Labour for work on Sundays.	Request authorization to work overtime from MAST. Request authorization to work on Sundays from MAST.		
	Regular Hours														

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

Oct-13	Apr-14	Oct-14	Apr-15
40%	89%	85%	85%

Multiwear S.A.

Location: Port-au-Prince
Number of workers: 1523
Date of registration: 05-Oct-09

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

Advisory and Training Services

Date	Activity
11-Sep-14	PICC induction for workers' candidates
07-Oct-14	PICC elections
10-Oct-14	Supervisory Skills Training
16-Oct-14	PICC elections
02-Nov-14	Supervisory Skills Training
05-Nov-14	Meeting with compliance officer to follow up on improvement plan.
26-Nov-14	PICC Training for worker representatives
27-Nov-14	PICC Training for worker representatives
01-Dec-14	PICC Training for management representatives
30-Jan-15	Meeting with compliance officer to plan the upcoming 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	●	◐	○	○	○	○	○	○	○	○	Payment for overtime hours worked on holidays.	Payment for all overtime hours must be calculated as prescribed by law with an increment of 100%.		
	Paid Leave	●	◐	○	○	○	○	●	○	●	○			Annual leave payments has been included in bonus and annual leave calculations. Payment for maternity leave is processed upon termination.	
	Premium Pay	○	○	○	○	○	○	○	○	○	●	Payment for regular hours worked on holidays.	Payment for all overtime hours must be calculated as prescribed by law with an increment of 50%.		
	Social Security and Other Benefits	●	●	●	●	●	◐	○	●	◐	●	Employer contribution to ONA. Forwarding of workers' contributions for social insurance funds to ONA.	Pay employer's contribution to ONA on time. Forward worker's contribution to ONA on time.		12
	Wage Information, Use and Deduction	○	○	○	○	○	●	○	○	○	○				
	Contracting Procedures	○	○	○	○	○	○	○	○	○	○				
	Dialogue, Discipline and Disputes	○	○	○	●	○	○	○	●	○	○				
Contracts and Human Resources	Employment Contracts	●	◐	◐	●	○	○	○	○	○	○				
	Termination	○	○	○	●	●	○	○	○	●	●			All termination have been processed such as the reason is clearly stated in workers' files and done in proportion to workers' behavior and 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				
Occupational Safety and Health	Chemicals and Hazardous Substances	●	●	●	●	●	●	●	●	●	●	Washing facilities or cleansing materials in the event of chemical exposure. Storage of chemicals and hazardous substances. Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Provide cleaning materials for workers using hazardous substances in case of contamination. All chemicals must be stored in a properly ventilated area with secondary containment to prevent spills. Ensure MSDSs are available and posted for all chemicals in use in the workplace.	All chemicals and hazardous substances used in the workplace have been properly labeled.	6
	Emergency Preparedness	●	●	●	●	●	●	●	●	●	●	Fire detection and alarm system. Marking or posting of emergency exits and/or escape routes in the workplace.	Install adequate fire detection and alarm system in warehouses of building 37 and 47. Mark or post emergency exits and/or escape routes in the workplace.	The factory ensures that all escape routes and emergency exits remain unobstructed at all times and lead to safe exits.	6
	Health Services and First Aid	●	●	●	●	●	●	●	●	●	●	Onsite medical facilities and staff. Pre-assignment and/or annual medical checks for workers.	The factory must have one additional nurse to meet labor law requirements with regards to the number of medical staff. Ensure that all workers receive a medical check at least once a year.		54
	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				
Health	Welfare Facilities											Washing facilities and/or soap.	Ensure enough soap and paper is available at all times in all restrooms at the factory.		54
												Toilets.	Provide the number of toilets required by the Haitian Labour code.		
												Eating area.	Provide an eating area to accommodate the workers.		
												Workplace cleanliness.	Keep the workplace clean and tidy.		
Worker Accommodation												Workplace temperature.	Reduce the temperature in the workplace.		30
Working Environment												Workplace lighting.	Adequately light the workplace.		
													The factory opened additional windows vents to allow more air to flow into the workplace.		
Worker Protection												Accommodating standing workers.	Ensure that all standing workers are properly accommodated.		54
												Installing guards on all dangerous moving parts of machines and equipment.	The factory must install guards on all dangerous moving parts of machines and equipment.	Workers in mechanic shop were provided with protective goggles.	
													The factory provided chairs with back rest to all 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				
Working Time	Leave	☐	☐	☒	☒	☒	☐	☐	☐	☐	☐				
	Overtime	☒	☐	☐	☒	☐	☐	☐	☐	☐	☒	Limits on overtime hours worked.	Ensure that overtime hours do not exceed the limit of 80 hours for a three months period.		
	Regular Hours	☒	☐	☒	☒	☐	☐	☐	☐	☐	☐				

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

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

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	●	◐	○	○	●	●	○	●	○			The factory provides adequate payment for weekly rest days.	
	Premium Pay	○	○	○	○	○	○	○	○	○	Employer contribution to ONA.	Pay employer contribution to ONA.		48
	Social Security and Other Benefits	●	◐	●	◐	●	●	◐	●	●	Forwarding of workers' contributions for social insurance funds to ONA.	Forward of workers' contributions for social insurance funds to ONA.		
	Wage Information, Use and Deduction	●	○	○	○	○	○	○	○	○				
	Contracting Procedures	○	○	○	○	○	○	○	○	○				
Contracts and Human Resources	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.	
Emergency Preparedness													The factory ensures that the workplace is equipped with adequate firefighting equipment.	18
		●	◐	●	●	○	◐	◐	●	◐	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		
											Onsite medical facilities and staff.	Provide onsite medical facilities and staff as required by law.		48
	Health Services and First Aid	●	●	●	◐	◐	◐	◐	●	●	Pre-assignment and/or annual medical checks for workers.	Provide pre-assignment and/or annual medical checks for workers.		
	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				
Occupational Safety and Health	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.	
											Installing guards on all dangerous moving parts of machines and equipment.	Install guards on all dangerous moving parts of machines and equipment.		48
											Installing, grounding, and/or maintaining electrical wires, switches, and/or plugs.	Ensure that all electrical wires, switches, and/or plugs are correctly installed, grounded, and/or maintained.		
											Training and encouragement of workers to use the personal protective equipment provided.	Provide training to workers to use the personal protective equipment provided.		
	Worker Protection	●	◐	●	●	◐	●	◐	●	◐	Training to workers to use machines and equipment safely.	Provide training for workers to 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.	
	Leave	○	○	○	○	○	○	○	○	○				

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

Percentage of piece rate workers earning 300 Gourdes 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: 1568
Date of registration: 11-Nov-09

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

Advisory and Training Services

Date	Activity
10-Sep-14	Management Intro Meeting.
31-Oct-14	Improvement verification with Compliance officer.
14-Nov-14	Meeting with management regarding the PICC operations.
11-Dec-14	PICC discussions with Management.
12-Dec-14	PICC meeting.
19-Jan-15	Meeting with Compliance manager on progress made.
5-Feb-15	Advisory on non-compliance points related to compensation with Compliance officers.
19-Feb-15	Follow-up meeting with the compliance managers on compensation issues.

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	○	○	○	○	○	○	○	○	○	○				

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	●	◐	◐	●	○	●	●	◐	○	●	Washing facilities or cleansing materials in the event of chemical exposure.	Ensure that there are adequate washing facilities or cleansing materials in the workplace.		
												Storage of chemicals and hazardous substances.	Ensure that chemicals and hazardous substances are stored adequately.		
												Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Display MSDS for all the chemicals used in the workplace.		
	Emergency Preparedness	○	●	◐	●	●	○	○	●	◐	●	Fire detection and alarm system.	Ensure that factory has an adequate fire detection and alarm system		12
												Firefighting equipment.	Ensure that the factory has adequate firefighting equipment.		
												Marking or posting of emergency exits and/or escape routes in the workplace.	Mark all emergency exits and/or escape routes in the workplace.		
												Safeguarding possible sources of ignition	Safeguard all possible sources of ignition.		
	Health Services and First Aid	●	●	●	◐	●	●	◐	○	●	●	Onsite medical facilities and staff.	Provide the required number of medical staff as per the law.		6
	OSH Management Systems	○	●	◐	○	○	○	○	○	○	○	Toilets.	Ensure that the number of toilets is compliant with the labor code.		54
	Welfare Facilities	●	●	◐	◐	●	◐	●	●	◐	●	Workplace cleanliness.	Keep the workplace 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				
												Workplace temperature.	Reduce workplace temperature.		42
	Working Environment	○	○	●	●	●	◐	◐	●	●	◐	Workplace lighting.	Improve workplace lighting.		
														Noise levels are limited to below 90 db	
	Worker Protection	●	◐	○	●	●	●	◐	●	○	●	Accommodating standing workers.	Accommodate all standing workers properly.		
Working Time	Leave	○	○	●	●	○	○	○	○	○	○				
	Overtime	●	●	◐	○	○	○	○	○	○	●	Limits on overtime hours worked.	Comply with the legal limits on overtime.		6
	Regular Hours	●	◐	◐	●	○	○	○	○	○	○				

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

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

Palm Apparel S.A.

Location: Port-au-Prince
Number of workers: 1468
Date of registration: 17-Nov-09

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

Advisory and Training

Date	Activity
3-Oct-14	Follow up meeting with Management on progress made
20-Oct-15	Training on chemicals management organized by IDB.
4-Feb-15	Meeting with HR manager on existing grievance process and PICC implementation.

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	○	○	○	○	○	○	○	○	○	○				
	Gender	○	○	○	●	○	○	○	○	○	○				
Discrimination	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	○	○	○	○	○	○	○	○	○	○				
	Paid Leave	○	○	○	○	○	○	○	○	○	○				
	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				
Compensation	Social Security and Other Benefits	●	◐	◐	●	○	●	○	○	○	●	Employer contribution to ONA. Forwarding of workers' contributions for social insurance funds to ONA.	Pay employer's contribution to ONA. Pay workers contribution to ONA.		
	Wage Information, Use and Deduction	●	○	○	○	○	○	○	○	○	○				
Contracts and Human Resources	Contracting Procedures	○	○	○	○	○	○	○	○	○	○				
	Dialogue, Discipline and Disputes	○	○	○	●	●	○	○	○	○	○				
	Employment Contracts	●	●	◐	●	○	○	○	●	○	○				
	Termination	○	●	○	○	○	○	○	○	◐	○			Reasons given to workers for termination were valid.	
	Chemicals and Hazardous Substances	●	◐	◐	●	◐	◐	◐	●	◐	○			The containers of chemical substances were labeled	
	Emergency Preparedness	●	◐	◐	●	◐	○	●	◐	◐	○			At least 10% of the workforce was trained in fire-fighting equipments	
												Onsite medical facilities and staff.	Provide required onsite medical facilities and staff.		54
	Health Services and First Aid	●	●	◐	●	◐	◐	◐	◐	◐	●	Pre-assignment and/or annual medical checks for workers.	Provide pre-assignment and/or annual medical checks for all workers.		
														At least 10% of workforce was trained in first-aid training.	
	OSH Management Systems	●	◐	◐	●	◐	○	○	○	●	○			The factory conducted an assessment of general occupational safety and health issues.	

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	Welfare Facilities	●	●	◐	●	●	●	◐	●	●	●	Toilets.	Provide the number of toilets required by the Haitian Labour code.		54
												Eating area.	Improve the existing eating areas to accommodate more workers.		
	Worker Accommodation	○	○	○	○	○	○	○	○	○	○				
	Working Environment	●	○	○	●	●	○	●	◐	●	◐	Workplace noise levels.	Reduce the noise levels in the factory.		
												Workplace lighting.	Adjust the lighting in the workplace.		
	Worker Protection	●	◐	◐	●	◐	◐	●	◐	●	○			Workers in spot cleaning section now have the appropriate PPE	
														Workers are trained and encouraged to use their PPE's	
														Standing workers are accommodated.	
														All wires were maintained in a safe state to prevent risk of electrical shock.	
	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				
Working Time	Overtime	●	●	○	●	●	○	○	○	○	●	Authorization from the Department of Labour for overtime. Authorization from the Department of Labour for work on Sundays.	The factory must request an authorization to work overtime from the Department of Labour The factory must request an authorization to work on Sunday from the Department of Labour		
	Regular Hours	●	●	●	●	●	●	○	○	○	●	Working time records.	Working time records must reflect actual working hours		

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

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

Premium Apparel S.A.

Location: Port-au-Prince
Number of workers: 1105
Date of registration: 28-Oct-09

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

Advisory and Training Services

Date	Activity
3-Sep-14	Supervisory skills training
10-Sep-14	Supervisory skills training
17-Sep-14	Supervisory skills training
19-Sep-14	OSH Committee meeting
1-Oct-14	Supervisory skills training
3-Oct-14	Advisory visit on improvement plan and implementation of PICC
7-Oct-14	Supervisory skills training
10-Oct-14	Chemicals management for the textile and garment industry in Haiti
14-Oct-14	Supervisory skills training
16-Oct-14	PICC Training
25-Oct-14	OSH awareness training
6-Nov-14	Supervisory skills training
12-Nov-14	Supervisory skills training
21-Nov-14	Follow up visit on PICC implementation
28-Jan-15	Management Intro Meeting and discussions about PICC preparation progress and training needs.

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	○	○	○	○	○	○	○	○	○	○				
	Gender	●	○	○	○	○	○	◐	○	○	○				
Discrimination	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					
Collective Bargaining	Strikes															
	Union Operations															
Compensation	Method of Payment															
	Minimum Wage															
	Overtime Wages												Payment for overtime worked at night.	Pay overtime worked at night as required by law.		
	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															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															
	Health Services and First Aid												Onsite medical facilities and staff.	Provide onsite medical facilities and staff as required by the law.	54	
														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 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.	6
	Overtime	●	●	○	○	○	○	○	○	○	○	○	Limits on overtime hours worked	Comply with limits on overtime hours worked set by the law.	
		●	●	●	●	○	○	○	○	○	○	○	Working time records.	Keep complete and accurate time records for all workers.	
	Regular Hours														

Percentage of piece rate workers earning 300 Gourdes 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: 368
Date of registration: 1-Oct-09

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

Advisory and Training Services

15-Sep-14 PICC preparation meeting and follow up on improvement plan.
 19-Sep-14 Factory tour to verify the implementation of remediation related to OSH non-compliance issues.
 22-Sep-14 Meeting with union representatives for the PICC.
 7-Oct-14 Meeting with the factory owner on non-compliance issues identified during the assessment.
 25-Oct-14 OSH Committee Meeting.
 15-Dec-14 Factory tour and follow up meeting with management on the improvement plan.
 17-Dec-14 Meeting with management, union and OSH committee members to present PICC.
 28-Jan-15 Meeting with plant manager to discuss the non-compliances issues from the last assessment and training needs.

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	●	○	○	○	○	●	●	○	○	●	Payment for ordinary overtime	Pay all workers 50% above normal wage for ordinary overtime worked.		

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	●	○	○	○	○	○	○	○	●	○				
	Premium Pay	○	○	○	○	○	○	○	○	○	○				
												Payment of minimum wage for temporary workers.	Pay at least minimum wage to all temporary workers.		
	Minimum Wages/Piece Rate Wages	○	○	○	○	○	○	○	○	○	●	Payment of minimum wage for apprentices.	Pay at least 90 Gourdes per day to all apprentices for ordinary hours of work.		
	Social Security and Other Benefits	○	●	○	○	○	○	○	●	○	○			The factory paid its contribution to OFATMA for work-related accidents insurance.	
Contracts and Human Resources												Payroll records.	Keep one accurate payroll record.		36
	Wage Information, Use and Deduction	●	○	○	○	○	○	○	○	○	○	Deductions from workers' wages.	Make only authorized and legal deductions from worker's wages.		
	Contracting Procedures	○	○	○	○	○	○	○	○	○	○				
	Dialogue, Discipline and Disputes	○	○	○	○	○	○	○	○	○	○	Disciplinary measures.	Ensure that disciplinary measures comply with legal requirements.		12
												Specifying terms and conditions of employment in employment contracts.	Specify terms and conditions of employment in all employees' contracts.		
	Employment Contracts	○	○	○	○	○	○	○	○	○	○	Contracts for all persons performing work for the factory.	Provide contracts for all workers including temporary workers and apprentices.		
												Internal work rules	Develop internal work rules and send them to MAST for approval.		
	Termination	○	○	○	○	○	○	○	○	○	○	Reasons for termination	Terminate workers for valid reason and include reasons for termination in all terminated workers files as required by the law		

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.	Label all chemicals and hazardous substances.	48										
			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.											
	Emergency Preparedness		Fire detection and alarm system.	Install adequate fire detection and alarm system.	54										
			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.											
	Health Services and First Aid		Onsite medical facilities and staff.	Provide onsite medical facilities and staff as required by the law.	54										
			Pre-assignment and/or annual medical checks for workers.	Provide pre-assignment and/or annual medical checks for workers.											
			Health checks for workers who are exposed to work-related hazards.	Provide health checks for workers who are exposed to work-related hazards.											
	OSH Management Systems		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..	54										
			Toilets.	Increase the number of toilets as required by law.	54										
		Worker Accommodation													
	Working Environment		Workplace lighting.	Improve lighting in the workplace.	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				
Working Time	Worker Protection	●	●	●	●	●	●	●	●	●	●	Installing, grounding, and/or maintaining electrical wires, switches, and/or plugs. Installing guards on all dangerous moving parts of machines and equipment.	Install, ground, and/or maintain electrical wires, switches, and/or plugs. Install guards on all dangerous moving parts of machines and equipment.	The factory provides workers with personal protective clothing and equipment. Safety warnings are posted in the workplace.	54
	Leave	○	○	●	●	○	○	○	○	○	●	Time off for breastfeeding breaks	Provide 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.		54
	Daily break periods	●	●	●	●	●	●	●	●	○	●	Daily break periods	Comply with the legal requirements on the daily break period.		
	Regular Hours											Working time records	Keep accurate working time records for all hours worked.		

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

Oct-13	Apr-14	Oct-14	Apr-15
18%	39%	36%	36%

S & H Global S.A.

Location: Port-au-Prince
Number of workers: 4050
Date of registration: 19-Jun-12

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

Advisory and Training Services

Date	Activity
5,6 Dec 2014	OSH Training.
14-Dec-14	Supervisory skills training.
21-Feb-15	Supervisory skills training.
22-Feb-15	Supervisory skills training.
24-Feb-15	Meeting with Management and 3 Union Cells regarding PICC implementation. Negotiation skills training.
25-Feb-15	Management Intro meeting and factory tour.
26-Feb-15	Advisory on Chemical Management systems and Emergency preparedness issues. Negotiation skills training.

Compliance cluster	Compliance point	Assessment					Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5				
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				
Compensation	Paid Leave	☐	☐	☒	☐	☐				
	Premium Pay	☐	☐	☒	☐	☐				
	Social Security and Other Benefits	☒	☐	☐	☐	☐				
	Wage Information, Use and Deduction	☐	☐	☐	☒	☐			The factory keeps one accurate payroll record.	
	Contracting Procedures	☐	☐	☐	☐	☐				
Contracts and Human Resources	Dialogue, Discipline and Disputes	☒	☐	☐	☒	☐			The factory trained their supervisors through a supervisory skills training provided by BWH.	
	Employment Contracts	☐	☐	☐	☐	☐				
	Termination	☒	☐	☐	☐	☐				
							Washing facilities or cleansing materials in the event of chemical exposure.	Set up an eye wash station in the warehouse where chemicals are stored.		6
							Labeling of chemicals and hazardous substances.	All chemicals and hazardous substances used in the workplace need to be labeled.		
	Chemicals and Hazardous Substances	☒	☐	☐	☒	☐	Assessing, monitoring, preventing and/or limiting workers' exposure to hazardous substances.	Workers' exposure to hazardous substances needs to be assessed, monitored, prevented and limited.		
							Storage of chemicals and hazardous substances.	All chemical products need to be stored properly.		
									There are MSDS for all chemicals and hazardous substances used in the workplace	

Compliance cluster	Compliance point	Assessment					Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5				
Occupational Safety and Health	Emergency Preparedness						Safeguarding possible sources of ignition.	Ensure that all sources of ignition are safely guarded.		12
							Fire detection and alarm system.	Install a fire detection and alarm system in the warehouse.		
									There are at least 2 emergency exits in the warehouse	
	Health Services and First Aid								There are sufficient fire fighting equipments in the workplace	
									Emergency exits and escape routes are marked and posted	
							Onsite medical facilities and staff.	Provide onsite medical facilities and staff according to Labour code.		24
	OSH Management Systems						First aid boxes/supplies in the workplace.	Ensure that there is a sufficient number of readily accessible first aid boxes in the workplace.		
							Pre-assignment and/or annual medical checks for workers.	Provided free pre-assignment and annual health checks for workers.		
	Welfare Facilities								Workers who use chemicals are provided with biannual health checks	
	Worker Accommodation								The factory performs an assessment of general occupational safety and health issues.	
									Soap is provided regularly	

Compliance cluster	Compliance point	Assessment					Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5				
	Working Environment	☐	☐	☒	☒	☒	Workplace noise levels.	Ensure that noise levels are acceptable.	The temperature in the workplace is acceptable.	12
	Worker Protection	☐	☐	☒	☒	☐			Appropriate safety warnings are posted in the workplace.	
	Leave	☐	☐	☒	☐	☐				
	Overtime	☒	☐	☐	☐	☐				
Working Time	Regular Hours	☐	☐	☐	☐	☐				

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

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

Sewing International S.A.

Location: Port-au-Prince
Number of workers: 1789
Date of registration: 25-Sep-09

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

Advisory and Training Services

Date	Activity
2-Sep-14	Advisory and OSH committee meeting
20-Oct-14	Participation in training on chemical management for the textile and garment industry in Haiti provided by Better Work and IDB
25-Oct-14	Training on OSH awareness
17-Dec-14	Follow-up meeting on the implementation of the PICC.
23-Jan-15	Meeting with HR Manager and Compliance Manager to discuss about the improvement plan and training needs.

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	○	○	○	○	○	○	○	○	○	○				
Compensation	Method of Payment	○	○	○	○	○	○	○	○	○	○				
	Minimum Wage	○	○	○	○	○	○	○	○	○	○				
	Overtime Wages	○	○	○	○	○	○	○	○	○	○				
	Paid Leave	●	◐	○	○	○	○	○	○	○	○				
	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				
Contracts and Human Resources	Social Security and Other Benefits	●	◐	○	●	○	●	◐	○	○	○				
	Wage Information, Use and Deduction	●	●	○	●	○	○	◐	●	●	○			The factory keeps accurate payroll records	
	Contracting Procedures	○	○	○	○	○	○	○	○	○	○				
	Dialogue, Discipline and Disputes	○	○	○	○	○	●	○	○	○	○				
	Employment Contracts	●	◐	◐	●	●	○	○	○	○	○				
	Termination	○	○	○	●	○	○	○	○	○	○	●	Reasons for termination	Include reasons for termination in all terminated workers' files.	
Occupational Safety and	Chemicals and Hazardous Substances	●	●	◐	●	◐	◐	◐	○	●	○			The factory provides adequate washing facilities and cleansing materials in the event of chemical exposure.	
												Fire detection and alarm system.	Install adequate fire detection and alarm system.		54
	Emergency Preparedness	●	●	◐	●	◐	◐	◐	◐	◐	◐			The factory conducts emergency drills at least every 6 months.	
														The factory stores all flammable materials correctly.	
														The factory ensures that all possible sources of ignition are properly safeguarded.	
												Onsite medical facilities and staff.	Provide onsite medical facilities and staff as required by law.		54
Occupational Safety and	Health Services and First Aid	●	●	●	●	●	●	◐	◐	◐	●	Pre-assignment and/or annual medical checks for workers.	Provide pre-assignment and/or annual medical checks for workers.		
	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				
Health														The factory ensures that the workplace is kept clean and tidy	54
	Welfare Facilities	●	●	●	●	●	●	●	●	●	●	Toilets.	Increase the number of toilets as required by law.		
	Worker Accommodation	○	○	○	○	○	○	○	○	○	○	Workplace temperature.	Reduce workplace temperature.		18
	Working Environment	○	○	○	●	○	○	●	●	●	●			Noise levels in the workplace were reduced	
	Worker Protection	●	●	●	●	●	●	●	●	●	●	Chairs with backrests.	Provide chairs with backrests for all workers.		54
												Installing guards on all dangerous moving parts of machines and equipment.	Install guards on all dangerous moving parts of machines and equipment.		
												Training and encouragement of workers to use the personal protective equipment provided	Train and encourage workers to use personal protective equipment provided	The factory provided training to workers to use machines and equipment safely	
Working Time	Leave	○	○	●	●	●	○	○	○	○	○				
	Overtime	●	●	●	●	●	●	○	●	○	○				
	Regular Hours	●	●	●	●	●	○	●	●	○	○				

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

Oct-13	Apr-14	Oct-14	Apr-15
40%	54%	45%	45%

The Willbes Haitian II S.A.

Location:	Port-au-Prince
Number of workers:	1121
Date of registration:	27-Aug-10

100 Factory was found non-compliant.
50 Factory was progressing
1 Factory was compliant.

Advisory and Training Services

Date	Activity
22-Sep-14	Advisory visit on the improvement progress of the factory.
20-Oct-14	Participation in training on chemical management provided by Better Work and IDB.
24-Oct-14	Supervisory Skills Training.
25-Oct-14	Occupational safety and health awareness training.
19-Jan-15	Management Intro meeting. Discussion on the improvement plan.

[illegible]

Compensation			Employer contribution to ONA.	Pay employer contribution to ONA as required by the law.	
			Payment of annual salary supplement or bonus.	Ensure that payment of annual salary supplement or bonus is accurate.	
	Social Security and Other Benefits	● ○ ● ○ ○ ○ ○ ○ ●	Collecting workers' contributions to ONA for social insurance funds.	Collect workers' contributions to ONA for social insurance funds as required by the law.	
	Wage Information, Use and Deduction	○ ○ ○ ○ ○ ○ ○ ○ ●	Payroll records.	Payroll records.	
Contracts and Human Resources	Contracting Procedures	○ ○ ○ ○ ○ ○ ○ ○ ○			
	Dialogue, Discipline and Disputes	○ ○ ○ ● ○ ○ ○ ○ ○			
	Employment Contracts	● ● ● ○ ○ ○ ○ ○ ○			
	Termination	● ● ● ○ ○ ○ ○ ● ○		Termination process has been reviewed to ensure reasons follow the legal requirements.	
Chemicals and Hazardous Substances			Labelling of chemicals and hazardous substances.	Label all chemicals and hazardous substances used in the workplace.	6
			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.	
			Training workers who work with chemicals and hazardous substances.	Train workers who work with chemicals and hazardous substances.	
				The factory has collected and posted MSDSs for all chemicals in use in the workplace.	
Emergency Preparedness			Firefighting equipment.	Install adequate fire fighting equipment in the warehouse.	48
				Management has relocated the congested packing area to prevent obstruction of escape routes.	
				Emergency exits signs have been installed and floor marked to indicated escape routes.	

Occupational Safety and Health	Health Services and First Aid		Pre-assignment and/or annual medical checks for workers.	Provide pre-assignment and/or annual medical checks for workers.	48	The factory has hired additional medical staff to comply with law requirements.
	OSH Management Systems		Toilets.	Provide the number of toilets required by the Haitian Labour code.	48	
	Welfare Facilities		Eating area.	Provide an adequate eating area to accommodate the workers.		
	Worker Accommodation		Workplace temperature.	Reduce the temperature in the workplace.	6	
Working Environment			Workplace ventilation.	Provide adequate ventilation in the workplace.		The factory has improved the lighting conditions to match recommended levels.
	Working Environment					
			Installing guards on all dangerous moving parts of machines and equipment.	Install guards on all dangerous moving parts of machines and equipment.	48	
	Worker Protection		Providing workers with personal protective clothing and equipment.	Provide workers in spot cleaning sections with appropriate masks to protect against chemical vapors.		
Working Time	Leave		Time off for breastfeeding breaks.	Provide paid breastfeeding breaks to workers who are entitled to the benefit.		
	Overtime		Limits on overtime hours worked.	Comply with limits of 80 hours of overtime within a three months period.		
			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 Gourdes or more for eight hours of work (workers' average earnings):

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

The Willbes Haitian III S.A.

Location: Port-au-Prince
Number of workers: 643
Date of registration: 27-Aug-10

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

Advisory and Training Services

Date	Activity
22-Sep-14	Advisory visit on the improvement progress of the factory.
14-Oct-14	Supervisory Skills Training
19-Jan-15	Management Intro meeting. Discussion on the improvement plan. Induction on PICC

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	○	○	○	○	○	○	○	○	○				
	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	○	○	○	○	○	○	○	○	○				
Compensation	Minimum Wage	○	○	○	○	○	○	○	○	○				
	Overtime Wages	○	○	○	○	○	○	○	○	○				
	Paid Leave	○	○	○	○	○	○	○	○	○				
	Premium Pay	○	○	○	○	○	○	○	○	○				
	Social Security and Other Benefits	●	○	●	○	○	●	○	○	○				

Compliance cluster	Compliance point	Assessment									Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9				
Contracts and Human Resources	Wage Information, Use and Deduction	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Contracting Procedures	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Dialogue, Discipline and Disputes	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Employment Contracts	☒	☐	☒	☐	☐	☐	☐	☐	☐	Disciplinary measures.	Disciplinary measures must comply to internal work rules and legal requirements.		12
	Termination	☒	☐	☒	☐	☐	☐	☒	☐	☐			Termination process has been reviewed to comply with factory's internal policies. All unused annual leave allowances have been paid to workers upon resignation or termination.	
	Chemicals and Hazardous Substances	☒	☐	☒	☐	☐	☐	☐	☐	☐			All chemicals and hazardous substances used in the workplace were found labeled.	
											Fire detection and alarm system.	Install adequate fire detection and alarm system in building 35.		18
	Emergency Preparedness	☒	☐	☒	☐	☐	☐	☐	☐	☒	Safeguarding possible sources of ignition	Take measures to reduce fire hazards resulting from fabrics and paper stored near electrical installations.		

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		Pre-assignment and/or annual medical checks for workers.	Ensure that all workers receive a medical check at least once a year and within the first three months of employment.	All workers who are exposed to work-related hazards have been offered free health checks.	48
	OSH Management Systems		Toilets.	Provide the number of toilets required by the Haitian Labor code.		48
	Welfare Facilities		Washing facilities and/or soap.	Ensure soap and paper is available at the workplace at all time during working hours.	The factory accommodated an eating area to accommodate the workers.	
	Worker Accommodation					
	Working Environment				The factory improved the lighting system to reach recommended 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	●	○	●	○	○	○	○	●	○	Accommodating standing workers. Installing guards on all dangerous moving parts of machines and equipment.	Standing workers must be provided with fatigue mats or have tables equipped with foot rest. The factory must install guards on all dangerous moving parts of machines and equipment.	The factory provided all workers doing hazardous work in the factory with the appropriate protective equipment. The factory trained workers to use machines and equipment safely.	48
	Leave	○	○	●	●	○	●	●	○	○				
Working Time	Overtime	●	○	●	●	○	●	○	●	○			The factory has requested the authorization to do overtime work and it has been granted.	
	Regular Hours	●	○	●	○	○	○	○	○	○				

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

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

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. [...]