

Better Work Haiti: Garment Industry 12th Biannual Synthesis Report Under the HOPE II Legislation

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List of Acronyms

ADIH	Association des Industries d'Haïti (Haitian Industry Association)
BMST	Bureau de la Médiatrice Spéciale du Travail
BW	Better Work ¹
BWH	Better Work Haïti
CAOSS	Conseil d'Administration des Organes de Sécurité Sociale (Board of Social Security Bodies)
CP	Compliance point
CSS	Conseil Supérieur des Salaires (Wages High Council)
CTMO-HOPE	Commission Tripartite de Mise en œuvre de la loi HOPE
EA	Enterprise Advisor
HELP	Haiti Economic Lift Program
HOPE	Haitian Hemispheric Opportunity Through Partnership Encouragement Act
ITUC	International Trade Union Confederation
MSDS	Material Safety Data Sheet
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 Industrial Organisations
SDT	Social Dialogue Table
TAICNAR	Technical Assistance Improvement and Compliance Needs Assessment and Remediation
USDOL	United States Department of Labor

¹ Better Work as a global program with country operations in several countries.

Section I: Introduction and Methodology

Better Work Haiti (BWH), 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 2015, total export revenues from the textile and garment industry accounted for approximately 90% of national export earnings and 10% of national GDP. The apparel industry is also among the largest employers within Haiti, creating jobs for approximately 40,000 people. Most workers (about 65-70%) are women who support a number of family members.

The program assists participating factories by conducting independent compliance assessments and providing advisory services and trainings. This report presents the results of assessments, advisory and training services provided to 25 factories in the period between March 2015 and February 2016.² 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 twelfth 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 25 factories. As outlined in the tenth public biannual synthesis report, Better Work (BW) transitioned to a revised service delivery model in spring 2015 with stronger focus on advisory services. Therefore, compliance information presented in this public report is based on assessment and advisory services at the factory level. In the period between September 2015 and February 2016, eleven out of the currently operating 25 exporting factories in Haiti, were assessed by Better Work and their updated compliance information is included in this report. For the remaining fourteen factories, information from their last assessment – conducted in the previous reporting cycle - is included to present aggregated industry level compliance data. A number of factories continue to be out of operations at the time of writing this report or have even closed down completely over the past months. In total, 25 out of formerly 32 factories are exporting from Haiti and continue to be assessed by Better Work Haiti. It also has to be noted that the closure of some factories has not resulted in an overall reduction in the number of employment in the garment industry in Haiti (see section 5.1 for further details).

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.

² Assessments are now being conducted on an annual basis for each participating factory. Therefore, assessment information is updated in every second compliance synthesis report for each individual factory.

The second section of the report outlines the compliance assessment findings from the most recent factory assessments in all factories. As explained above, the Better Work service delivery model underwent some changes in early 2015. Factories are now being assessed on an annual basis. Therefore, compliance information in these biannual public reports is drawn from the last assessment that has been conducted in each factory. For about half of the factories, this last assessment will have taken place in the past 6 months, for the other half, the most recent assessment has been conducted 6-12 months ago. The third section of the report describes Better Work Haiti advisory and training services in the period from September 2015 – February 2016 in all participating factories

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

1.2. Context

The HOPE II legislation and the TAICNAR project

In 2006, the United States Congress enacted the Haiti Hemispheric Opportunity through 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 and in 2015, the US Government extended the Haiti HELP/HOPE provisions until 2025.

In order to benefit from HOPE/HOPE II/HELP, Haiti was required to establish an independent 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 technical assistance program to (i) assess and promote compliance with core labour standards and national labour law in the factories that are eligible for tariff advantages under HOPE II and (ii) provide assistance to the Government of Haiti in order to strengthen its capacity in the process of inspection of facilities.

This was referred to in the legislation as the *Technical Assistance Improvement and Compliance Needs Assessment and Remediation* (TAICNAR) program. Finally, Haiti needed to develop a mechanism for

ensuring that all producers benefiting from the HOPE II trade preferences participated in the TAICNAR program.

The two components of the TAICNAR program aim at strengthening labour compliance of the industry in Haiti. The first of these elements 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. The second element of the TAICNAR program consists of technical assistance to strengthen the legal and administrative structures for improving compliance in the industry. The scope of these services is extensive, encompassing technical assistance from the ILO in reviewing national laws and regulations to bring them into conformity with international standards, raising awareness of workers' rights, and training labour inspectors, judicial officers and other government personnel.

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. Removal of benefits is based on determinations made by the government of the United States, based primarily on non-compliance identifications made by the U.S. Department of Labor (USDOL). While Better Work Haiti reports are consulted as USDOL carries out its mandate to implement HOPE II, Better Work Haiti non-compliance findings cannot, on their own, serve to impact preferential treatment under the HOPE Act.

Better Work Haiti, which is a partnership of the ILO and the IFC, is implementing the first component of the TAICNAR program while other ILO projects, in particular the ILO-MAST capacity building project work on the second component. The Better Work program is coordinating its work with the Labour Ombudsman and a tripartite Project Advisory Committee (PAC). This committee meets with Better Work on a regular basis to discuss the activities of the Better Work program. The members of the PAC represent the private sector, government and worker representatives and the Committee is chaired by the Labour Ombudsperson in line with the requirements of the HOPE law.

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.

- Apparel exports from Haiti to the US continue to grow, rather slow but steady with an average growth of approximately US\$ 50 million per annum over the past 3 years. The total export volume of apparel products from Haiti to the US in 2015 was US\$ 895 million with approximately half of these exports being shipped under the trade preferences granted under the HOPE II legislation.
- The employment figures now regularly published by ADIH for the garment sector passed the 40,000 margin in August 2015 and remained more or less at the same level until February 2016. It has to be noted, that ADIH includes management staff in these calculations. Based on Better Work's data collection over more than five years in Haiti's garment industry, one can say that management staff accounts to approximately 10-15% in the factories. Therefore, the number of workers lies at around 36,000 with 65-70% being women. Also, Better Work data shows a slight increase in employment figures for the North while the number of workers employed in the garment sector in the capital has slightly

decreased. In Port-au-Prince, several factories have ceased operations over the past months, while employment in the industry in the North is steadily increasing.

- On 25 October 2015, presidential elections were held in Haiti together with local elections and the second round of legislative elections. None of the presidential candidates received a majority in this first round of presidential elections. Therefore, a runoff was scheduled for 27 December 2015. However, the Provisional Electoral Council postponed the runoff elections shortly before the scheduled date. In January 2016 President Martelly then announced that elections would be held on 24 January, yet elections could not be held. The president left his office on 07 Feb 2016 as foreseen. An interim government was put in place and elections are now scheduled for April 24th, 2016.

- The Wages High Council (Conseil Supérieur des Salaires – CSS) has not yet officially submitted their third report with recommendations to the Government of Haiti about the minimum wage revision. The Council has been foreseen by law since 1983 but has only been established in August 2013. The first two reports of the CSS which have been submitted to the Government in the past have resulted in an increase in the minimum wage for the garment sector in Haiti as of 01 May 2014 and 01 May 2015 respectively. Not all members of the tripartite council have signed the current draft of the CSS report yet.

- Share Hope continues its program of workers' wellbeing initiatives in the sector in Haiti. The HERHealth program in Haiti which is training factory workers on important health topics is currently implemented in five factories and is funded by Share Hope (70%) and by buyers (30%). The buyers supporting the project are Li & Fung Foundation/ F&T Apparel (a division of Global Brands Group) and Levi Strauss Foundation. In September 2015, Share Hope also launched a high school completion program. This program provides an opportunity for 40 garment factory workers in and around SONAPI who failed the final year of high school to prepare for and take the exam (Baccalaureat II). Share Hope wants to give these workers an opportunity to finish what they started and complete their studies. Share Hope's program is following the national Haitian curriculum. At the time of writing this report, the High School completion program has passed the half-year mark with final exams coming up in June. HR managers are regularly updated about their workers' progress and are supportive of the workers' commitment to finishing High School while working. At present, this program is fully funded by Share Hope. A third program on factory clinic improvements has been launched in February 2016 in partnership with Better Work and with support from Levi Strauss Foundation. The project intends to help factories use the resources they already have (factory clinics, doctors and nurses) for the benefit of workers' health and well-being. The clinics are being assessed and systems are improved. Additionally, nurses undergo a continuing education program which will equip them to better assist workers in their factory on health-related topics. With Share Hope's worker well-being initiatives, they have joined the Sustainable Development Goals movement to work on the betterment of the livelihoods of people and the environment.

- The BMST/ CTMO-HOPE continues to provide support to the sector: Their office building inside the Metropolitan Industrial Park SONAPI (Building 48) is used by several stakeholders for various meetings and trainings. Share Hope's initiatives mentioned above are largely taking place inside this building as well as a number of BWH trainings for factories. BWH also holds meetings with union representatives in this facility. Moreover, CTMO-HOPE grants access to its facility to the Association of Lawyers.

- Better Work Enterprise Advisors and inspectors from the Ministry of Social Affairs and Labour (MAST) started to go on joint assessment visits to factories in Port-au-Prince and the Northern region in December 2015. These visits had been long prepared in the framework of a collaboration between the

ILO and the MAST as part of the HOPE legislation. Further information on this collaboration can be found in the next section.

TAICNAR Program Component 1: Compliance Assessments and Remediation Support

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

Better Work Haiti is implementing this component of the TAICNAR program. The details of Better Work’s assessment methodology are explained in chapter 1.3 of this report. Aggregated findings for the entire industry regarding compliance with national and international labour law are outlined in chapter II of the report. Chapter V then provides the details of compliance for every single factory that has been assessed.

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

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

The ILO is conducting different activities under this component.

In 2014, the ILO launched a USDOL-funded project supporting the Ministry of Social Affairs and Labour (MAST). The objective of the project is to strengthen the capacities of the Ministry in order to improve garment factories’ compliance with international and national labour laws. It is therefore another important component of the TAICNAR program required by USDOL in order for Haiti to benefit from HOPE preferences.

In the context of this ILO-MAST capacity building project, a task force of 18 inspectors and other Ministry officials has been set up within the Ministry, and a series of different trainings for the Ministries’ mediators, conciliators and labour inspectors have been provided since June 2014 in collaboration with the Labour Ombudsperson and Better Work Haiti, such as training on international core labour standards, deontology and methodology of labour inspection, practice of labour inspection and labour administration tools, Occupational Safety and Health, the Labour Law, negotiation skills, mediation etc.

Since the inception of the MAST capacity building project, it has been planned that these trained labour inspectors will shadow Better Work Enterprises Advisers in conducting labour inspection visits in the apparel sector in 2015 as well as other activities by Better Work EAs, such as advisory or training services. This collaboration is aiming at giving an opportunity to MAST inspectors to capitalize on Better Work’s enterprise level knowledge and methodology in their core service delivery. The first round of joint visits has taken place in August 2015 during Better Work advisory services. In December, the first joint visits during BW assessments were equally conducted. The MAST inspectorate task force members will further contribute to disseminate and transfer the acquired knowledge and competencies to their other colleagues.

In fall 2015 and prior to conducting joint assessment visits between Better Work teams and MAST inspectors, MAST and Better Work Haiti signed two important documents that further strengthen the collaboration between MAST and the ILO. A general Memorandum of Understanding (MoU) on the collaboration between the two institutions aims at harmonizing and coordinating their respective interventions in the Haitian garment industry in order to improve working conditions in the sector. The MoU particularly specifies the scope of the collaboration with regards to inspection visits in garment factories, particularly in light of the HOPE II trade preferences. The associated “Zero Tolerance Protocol” (ZTP) relates to Better Work’s confidentiality agreement with factories. In general, BW shares findings from factory assessments only with the factory itself and any buyers authorized by the factory. However, in the case of severe violations of workers’ rights as listed in this zero tolerance protocol, Better Work will inform the Ministry of Social Affairs and Labour about the issues identified.³

The ILO/ MAST project also assisted the Labour Inspectorate of MAST to develop a strategic inspection plan for the garment sector including target inspection visits. Up to date, 22 visits have been conducted out of which 14 were unannounced visits by the inspectors in factories and 8 were joint visits with Better Work teams. These visits covered the capital and also the North of Haiti with its two industrial sites in Ouanaminthe and Caracol. Logistical support for the work of the labour inspectors was equally provided to the Ministry through the ILO-MAST project. Computers, calculators, Labour Laws and the international labour standards ratified by Haiti have all been given to the MAST task force in order for them to do their work efficiently.

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 the first year of the program. The intention of this effort is to help increase motivation, reduce rotation of staff and to allow for vertical career progression within the labour inspectorate of MAST.

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.

In March 2016, the project launched a KAP (Knowledge, Attitude and Practices) study through a local implementation partner. The objective of the study is to measure the level of knowledge about labour standards of workers and employers in the sector in Haiti. The results of this study will help to put together a comprehensive information and education campaign to improve knowledge of workers and employers about the subject.

³ To access both documents, please consult the BWH website (http://betterwork.org/haiti/?page_id=1815).

Another activity under the ILO-MAST capacity building project is to assist the MAST in the modernization of a call centre which should serve as a key contact for workers and employers to bring issues to the attention to MAST. The call centre can direct any queries to the department concerned within the Ministry.

Another joint activity of the ILO-MAST project, the Better Work Haiti team and the Ministry is the elaboration of a comprehensive labour law guide. This practical guide has been elaborated between all parties over a 6 months period. Numerous meetings were held to develop the guide which is currently undergoing a validation process within the Ministry of Social Affairs and Labour. The objective is to publish the guide as a tool for employers, workers and any other interested party in the form of a handbook and a mobile app. The guide will be available in 5 languages (English, French, Kreyol, Spanish, Korean) later on in 2016.

Since 2011, the ILO is assisting the MAST in the process of a tripartite revision of the Labour Code. Different political conflicts have delayed the finalization of this reform process. However, the tripartite partners have engaged to complete the reform through a process of dialogue which takes into consideration the international labour standards ratified by the country and comments from the different departments of the ILO.

The labour law reform represents an important revision of the law currently in force in Haiti which dates back to 1961 with a revision from 1983. The tripartite actors are aiming for compliance of the code with the international norms ratified by Haiti including the eight core labour standards. The creation of modern legal framework for the country is of utmost importance.

Currently, all tripartite partners – government, employers, workers - are working on a unilateral revision of the labour code in order to then meet in a tripartite setting to allow for a consensus on the code. In this context, a tripartite commission under the leadership of the MAST has been formed on the labour law reform process. Each of the tripartite partners is represented in this commission and therefore the support of this process is a direct support on social dialogue in itself.

Industrial Relations in the Haitian garment industry

At the time of writing this report, 9 officially recognized trade union centrals/confederations are present in 18 out of the 25 currently operating factories which are part of the Better Work Haiti program. Thus, approximately 70% of those exporting apparel factories in the country now have a union presence.⁴

The Haitian labour movement continues to benefit from international support from Solidarity Center/AFL-CIO. The office of Solidarity Center/ AFL-CIO in Port-au-Prince is open 7 days a week in order to facilitate access for Haitian unions. In the Center, visitors have access to computers, printers and internet for their work as well as a meeting room that is frequently used, in particular on weekends. Between October 2015 and February 2016, Solidarity Center/AFL-CIO provided continuous support to 6 organizations in the continuous process of unionization. Additionally, training workshops were offered in

⁴ 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.

Ouanaminthe and Port-au-Prince. Topics covered were conflict identification and resolution, proliferation of trade unions, collective bargaining, ONA.

Besides that, Solidarity Center actively supports unions organizing campaigns in the Haitian garment industry and offers legal assistance to unions in factory dispute cases. Solidarity Center is also an advocate of the social dialogue table for the garment industry by supporting the representatives of workers in the social dialogue table and regularly participates in all of its meetings as an observer itself.

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 continues to be pending as no decision has been taken by the Authorities yet.

The Social Dialogue Table 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. In March 2014, a formal Memorandum of Understanding was signed between its members and observers and in summer 2014, the secretariat of the table was put in place. In 2015, the table then registered as an association and therefore became a legal entity. Its executive secretariat consists of four members, two employer representatives and two union representatives. It is actively supported by the Office of the Labour Ombudsman. The Social Dialogue Table is serving as a forum for exchange and negotiation between employers and workers in order to strengthen the competitiveness of the Haitian garment sector in creating employment and contributing to the Haitian economy through the promotion of decent work. Since its establishment in mid-2014, the executive secretariat of the roundtable has called for regular meetings once a month. In 2016, Better Work is supporting the table in the elaboration of a comprehensive project proposal with a concrete work plan for the table for the next 5 years. The project proposal is supposed to help secure some funding for the table in order to implement the planned activities and more effectively fulfil its mandate.

Since January 2015, Better Work Haiti has designated a full-time Industrial Relations Officer. This person is liaising with national partners to assist the sector in these efforts and to further strengthen social dialogue and promote greater compliance with freedom of association issues.

The Better Work Haiti Industrial Relations (IR) Officer is working closely with the Social Dialogue Table, the Labour Ombudsman, employers and all the unions of the garment industry in Haiti. Overall, the sector has seen an increase in communication between unions and employers, more meetings are being held, in some factories protocols are being signed on production quotas between management and union cells. In general, more information exchange between all stakeholder is being noticed which speaks for evolving industrial relations with a clear intent by all parties involved to improve cooperation.

Strengthening industrial relations is an integral part of BW's project agenda. BWH addresses this on two levels; (i) individual factory level interventions with advisory and training services as part of Better Work's core services to strengthen enterprise level social dialogue and sound industrial relations as well as (ii) sectoral interventions to strengthen social dialogue beyond individual factory level issues, e.g. through the Social Dialogue Table.

As part of this objective to strengthen industrial relations in the garment sector in Haiti, BW is planning different activities to increase the capacities of trade unions. These activities will build the capacity of the federations and the union cells to have a better understanding of industrial relations and the way in which rights to freedom of association and collective bargaining can operate in practice at the workplace level and to be able to identify good practices that they can use to prevent and resolve workplace disputes and come to common understandings and to understand appropriate channels through which to discuss and resolve issues at the workplace level and how to communicate these properly. Between October 2015 and March 2016, the IR Officer held a number of meetings and trainings with union representatives updating them on the evolution of the bipartite committees, the public biannual synthesis reports under the HOPE II legislation and other issues related to industrial relations. Better Work Haiti also launched an industry seminar on effective grievance mechanisms in which Performance Improvement Consultative Committee (PICC) members from different factories participated. Follow up of the learnings from this seminar at the factory level is provided through regular BW advisory services through the team of Enterprise Advisors. In January 2016, Better Work put together a comprehensive union capacity building plan for the entire year and presented the plan to the unions for input and comments. In this plan, Better Work has planned for a monthly meeting with the union leaders as well as a monthly meetings/ trainings with factory level union cells. Topics cover a wide range of topics such as labour law, collective bargaining, workers rights' and responsibilities, communication in the workplace etc. Activities will also cover unions operating in the North of the country.

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

In general, the Labour Ombudsperson cooperates with all stakeholders in the sector and is particularly involved in all efforts of coordination and mediation as well as training activities that are being held jointly with officials from the MAST. Equally, the Ombudsman's Office is trying to establish a more formal relationship with the Ministry's (MAST) Conciliation Service. The Labour Ombudsperson is also providing support to the Social Dialogue Table.

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 ⁵	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 ⁶ 18. Overtime Wages 19. Premium Pay 20. Method of Payment 21. Wage Information, Use and Deduction

⁵ 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.

⁶ Since the 8th Better Work Haiti synthesis report, Better Work Haiti only reports non-compliance with the minimum wage of reference of 240 Gourdes (as of 1st May 2015). The reporting on the production wage of 320 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.

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

Calculating non-compliance

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

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 containing aggregated information on the industry are prepared on the basis of the individual factory assessment reports and published twice a year. Better Work is planning to expand its reporting in the other Better Work countries to include individual factory-level compliance information, starting at the end of 2016. 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), tenth (April 2015) and eleventh (October 2015) Biannual Reports, as required by the HOPE II legislation.

The current report includes aggregated industry compliance data, as well as detailed factory-level

analysis of compliance needs, priorities for remediation identified by the factory and efforts made to address compliance needs.

Limitations in the assessment process

The factory-level assessments carried out by Better Work Haiti follow a thorough checklist of about 230 questions covering the abovementioned labour standards, and gathering general information about the factory.⁷ Information is gathered through a variety of sources and techniques, including document review, observations on the shop floor, and interviews with managers, workers and union representatives. The information collected is compiled and analysed to produce a detailed assessment report. Before the reports become official, factories are given seven calendar days to provide feedback.

Worker interviews conducted during the assessment process are held onsite, either in a private room within the factory building or outside the building (yard, eating area), and take place either in small groups or individually. Interviews are conducted in Kreyol, the primary language of the workers. Workers may be suspicious and feel uneasy about sharing information on their workplaces with people who are not well known to them and coaching of workers by factory management is considered a common problem in the industry in general. Nevertheless, after eleven assessments conducted over several years, Better Work Haiti Enterprise Advisors have become more experienced at collecting information and interviewing workers, which together with other activities led by Better Work Haiti have contributed in creating an environment where workers are more comfortable discussing working conditions. Interviews with workers cover many aspects of life at work and last approximately 20 minutes. On average, 40 workers representing different sections of the factories, as well as union representatives, are interviewed.

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

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

⁷ Better Work has recently published the list of questions from its Compliance Assessment Tool (CAT) including their legal references. It can be accessed here: http://betterwork.org/haiti/?page_id=1731

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

Better Work's Revised Service Delivery Model

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

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

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

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

As of the 11th Better Work Haiti cycle in spring 2015⁸, a factory cycle will no longer start with an assessment on which advisory services afterwards were built in the initial approach. Under the adjusted model, the cycle will now start with a period of approximately 100 days of advisory services in which the factory with its bipartite committee can conduct a self-diagnosis with support of its Better Work Enterprise Advisor and can work on immediate improvements where possible. The unannounced Better Work assessment is then conducted after the initial period of advisory and training services.

Following the assessment, the advisory process continues, focused on enabling the bipartite committee to address issues that are listed in the improvement plan. The improvement plan includes issues that the factory has self-diagnosed and those that were identified during the Better Work assessment.

Factories will be supported through tailored factory visits; issue specific seminars (on topics relevant to the country/industry) with peers from other factories; and training appropriate to the factory's specific needs.

Under the revised service delivery model, Better Work reporting has two elements – reports completed and verified by the program and those that are completed and released directly by factories.

The Better Work factory reports consist of the assessment report that is released roughly 30 days after the unannounced assessment visit. In the 11th month of the cycle, Better Work will then publish a progress report, detailing improvements on compliance issues, as well as in-factory dialogue and the use of effective management systems.

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

Factory reporting is published approximately 5 months after the start of the cycle. This report will include progress to date on all self-diagnosed issues as well as those identified by Better Work during the assessment. This report will be available to authorized buyers and will indicate initial progress and planned steps for the remainder of the year. The Better Work role for this first progress report will be limited to coaching factories on how to engage in effective self-reporting and how to ensure continued progress on closing areas of non-compliance.

Implications of the Revised Approach for Public Reporting under HOPE II

The HOPE II law requires that Haiti in cooperation with the ILO establishes a Technical Assistance Improvement and Compliance Needs Assessment and Remediation Program (TAICNAR) which (i) assesses Haitian garment factories exporting under the HOPE II law on compliance with international core labour standards and national Haitian labour law, (ii) assists these factories on their remediation efforts and (iii) provides capacity building to the Government of Haiti on these aspects. The requirements of the HOPE II law with regards to biannual reports being published by the entity operating the TAICNAR program are quoted in annex 1 (HOPE II Legislation Reporting Requirements).

The change in Better Work's service delivery model described above will not derogate these requirements of the HOPE II legislation. Public biannual synthesis reports will continue to be published on the 16th of April and the 16th of October of each year. The findings from each factory's annual assessment will be reported in one of these two synthesis reports including the date of each factory's assessment.

⁸ This relates to the number of rounds of assessments that BW Haiti has been conducting since the inception of the program. Every factory has received a varying number of assessments depending on when they joined the BWH program and whether they have been in operations in each cycle.

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

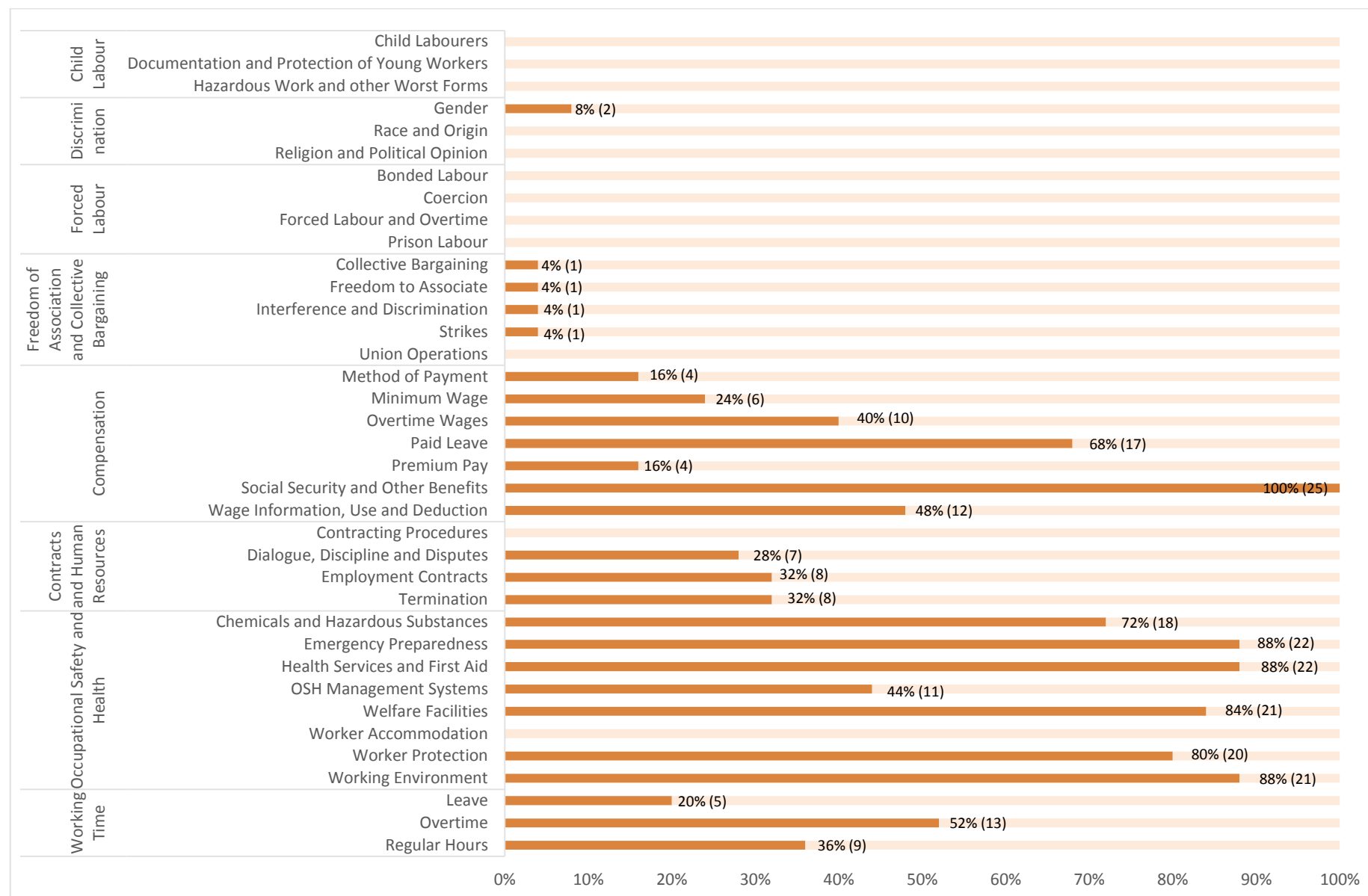
2.1. Compliance Assessment Findings (11th and 12th round of assessments)

Non-compliance rates

Chart 1 presents non-compliance findings for the 25 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. Please note that as these reports are issued biannually, yet assessments are being done on an annual basis, issues are reported in two consecutive reports. In the individual factory tables, progress on the remediation of issues can be followed in further detail.

Chart 1: Non-compliance rate*



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

2.2. Detailed Findings

1. Core labour standards

During the last round of assessments, which took place between September 2014 and August 2015 in 25 factories, the following results have been observed.

A. CHILD LABOUR

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

B. DISCRIMINATION

As reported in the previous cycle, two factories were identified as non-compliant under Discrimination Cluster and both cases relate to gender. In one factory, a female worker was fired shortly after she had submitted a medical certificate stating her pregnancy (20th week). The worker had just been newly hired by the factory a month prior to that and the factory fired her without receiving prior authorization by the Ministry of Labour. Management stated that the termination was due to the fact that she was not able to perform the work she was assigned. Also, they stated that the woman had misled the factory regarding her ability to work, as she did not declare her pregnancy during the recruitment process. However, no proof of the woman's inability to perform her work was found in her file. The factory remediated this issue in the following period of advisory services as they compensated the concerned worker for the time that she was not working with the appropriate amount of back pay. In addition, the factory agreed to reinstate this worker.

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

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

For remediation efforts of both cases, please consult individual factory tables in section V of this report.

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 four instances of non-compliance in this reporting period under the Cluster for Freedom of Association and Collective Bargaining. Four non-compliance points have a non-compliance rate of 4% each: (i) Collective Bargaining, (ii) Freedom to Associate, (iii) Interference and Discrimination and (iv) Strikes. Three of these four cases have already been reported in the 11th public synthesis report under the HOPE II legislation. Further details on all four cases are explained below.

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.

The two non-compliance findings on Freedom of Association and Interference and Discrimination relate to the same situation at a factory where a sewing operator was terminated in August 2014. This worker who had started to work in the factory in May that same year, was a union member. Neither the worker nor the union had provided the factory any formal notification of the worker's union affiliation. The worker's file showed that this termination was related to lack of work. There were no disciplinary warnings in the worker's file. Management stated that this worker was among the workers selected for termination as he had less than three months in the factory. One day after his termination, the union sent a letter to the factory's management requesting a meeting in order to discuss the case of the terminated worker, stipulating in the letter that this worker was one of their representatives. Since then many discussions have been held with the factory in which they repeatedly agreed to reinstate this worker. Yet at the time of the assessment in July 2015, the worker had not been reinstated. The factory was found in non-compliance for Freedom to Associate ("Can workers freely form and join the union of their choice?") as well as Interference and Discrimination ("Has the employer terminated workers or not renewed a worker's employment contract due to the worker's union membership or activities?") for this case.

The fourth case of non-compliance under this cluster refers to a non-compliance finding of punishing workers for participating in a strike. In this case, 33 workers were terminated after having gone on strike to protest the termination of an executive committee member of a union. Management stated that the 33 workers were terminated because of a change in production style as the workers were not able to perform the new operations. Yet, 20 out of 33 files of those terminated workers indicated that they were in fact terminated for their participation in a strike with no valid reason. No official independent body has determined whether the reasons for the strike were valid. The 33 workers were paid in accordance with the law and according to the information collected at the time of the assessment visit, the union has not appealed the terminations. Based on the evidence above, Better Work found non-compliance for firing workers for their participation in a strike.

For remediation efforts of these cases, please consult individual factory tables in section V of this report.

2. Working conditions

E. COMPENSATION

In the compensation cluster, the highest numbers of non-compliances persist in the Compliance Point of Social Security and Other Benefits (100%), relatively high remains equally the non-

compliance rate under the Point on Paid Leave (68%). The compliance point on Wage Information, Use and Deduction has a non-compliance rate (48%) and the one on Overtime Wages has a rate of 40%. Under the Minimum Wage, 24% of assessed factories are in non-compliance. The issues are detailed in the tables below.

In Focus 1 : Minimum Wage

Question	# factories out of compliance
Does the employer pay at least 240 Gourdes as of May 1st, 2015 per day for ordinary hours of work to all full time workers?	6
Does the employer pay at least 240 Gourdes as of May 1st, 2015 per day for ordinary hours of work to temporary workers?	0
Does the employer pay at least 240 Gourdes per day for ordinary hours of work to temporary workers?	0
Does the employer pay at least 96 Gourdes as of May 1st 2015 per day for ordinary hours of work to apprentices?	0
Does the employer pay at least 96 Gourdes per day for ordinary hours of work to apprentices?	0

During the recent assessments, 6 factories were identified as non-compliant regarding the minimum wage. Three of these cases date back to the first 2 or 3 months after the increase of the minimum wage from 225 to 240 Gourdes which came into effect on 01 May 2015. These cases were already cited in the last synthesis report. In one case, a factory had not yet transitioned to the newly announced wage of 240 Gourdes at the time of the assessment. The other two cases had indeed transitioned to the new minimum wage but had not applied it systematically to all workers as security personnel had not yet received the increased amount of 240 Gourdes for eight hours of work. The following 3 assessments in which a non-compliance was identified several months after the minimum wage increase of May 2015, relate again to two cases concerning the security guards which did not yet receive the required 240 Gourdes. In fact, as no reliable attendance records were available for them, there was no evidence that the amount they received corresponds at least to the minimum wage for 8 hours of work. In those factories, lack of written payroll procedures seems to be the root cause of those non-compliance issues. In the last case, the factory had a practice where workers who do not punch out, will only receive payment for half day even if they have worked all day.

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

Table 2 : Weighted percentage of workers on an incentive system earning at least 300 (320 Gourdes as of 1st May 2015) per eight hours of work across all factories assessed by Better Work ⁹

Synthesis Report Publication	Weighted percentage of workers on an incentive system earning at least 300 (320 Gourdes as of 1st May 2015) per eight hours of work across all factories assessed by Better Work
April 2014 (8th BW synthesis report)	29%
October 2014 (9th BW synthesis report)	37%
April 2015 (10th BW synthesis report)	41%
October 2015 (11th BW synthesis report)	38%
April 2016 (12th BW synthesis report)	40%

In Focus 2 : Overtime Wages

Question	# factories out of compliance
Does the employer pay workers 100% above the normal wage for all overtime hours worked at night?	5
Does the employer pay workers 100% above the normal wage for overtime hours worked on legally mandated holidays?	1
Does the employer pay workers 100% above the normal wage for overtime hours worked on weekly rest days?	0
Does the employer pay workers 50% above the normal wage for all ordinary overtime hours worked?	7

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

Seven factories have been found non-compliant for failure to pay 50% above the normal wage for ordinary overtime hours worked. These cases mainly relate to security guards who have a fixed salary that does not reflect the overtime hours which are included in their regular working time schedule. In

⁹ Better Work collects the percentages of workers on an incentive system per factory who earn at least 300 (320 Gourdes as of 1^{er} Mai 2015) or more during eight hours of work (excluding workers who have been recruited within the past 3 months, or those who have been using their equipment for 3 months or less). The calculations are based on average earnings. Please note that the percentages provided in this table are being calculated as weighted averages, taking into consideration the different factory sizes and their respective number of workers on an incentive system and figures are based on the last assessment conducted by Better Work at each facility. In the figures presented in this 12th compliance synthesis report, the figures for two factories could not be included as their payroll records did not allow a proper calculation of the earnings of the workers who are paid based on an incentive system.

previous rounds of assessments, the security guards had not consistently been part of the assessments by Better Work but that this approach had been revised as of May 2015.

In Focus 3 : Paid Leave

Question	# factories out of compliance
Does the employer pay workers correctly during breastfeeding breaks?	0
Does the employer pay workers correctly during sick leave?	14
Does the employer pay workers correctly for annual leave?	5
Does the employer pay workers correctly for legally mandated holidays?	2
Does the employer pay workers correctly for maternity leave?	15
Does the employer pay workers correctly for weekly rest days?	5

During this last assessment cycle, a relatively high non-compliance rate on the compliance point Paid Leave was found. At the question level, it shows that payments for workers who are on sick leave or on maternity leave were not correctly done by 14 and 15 factories respectively. In most cases, the non-compliance is based on the fact that payments are calculated on the minimum wage and not on the average wage as required by the law. This sudden raise is due to the fact that Better Work Haiti revised its approach on the assessment of paid leave as of May 2015 in order to more accurately reflect the requirements of article 148 of the labour code after clarification from MAST.

Five factories also did not pay workers correctly for annual leave which also needs to be calculated based on the average daily rate. In 5 additional cases, payments to workers during weekly rest days was not done in compliance with the law by the factory.

Payments for legally mandated holidays were not done correctly in two factories.

In Focus 4 : Social Security and Other Benefits

Question	# factories out of compliance
Does the employer collect and forward workers contributions to OFATMA?	23
Does the employer collect and forward workers' contributions to ONA?	12
Does the employer pay 3% of workers' basic salary to OFATMA for maternity and health insurance?	25
Does the employer pay 3% of workers' basic salary to OFATMA for work-related accident insurance?	6
Does the employer pay the required employer contribution to ONA?	12
Does the employer pay workers their annual salary supplement or bonus?	5

The non-compliance rate on social security and other benefits is always quite high, yet has reached 100% in this reporting period. This is owed to the fact that all assessed factories have not subscribed to the newly available maternity and health insurance which the government entity OFATMA is offering since December 2014. Although this has always been a requirement of the law, Better Work did not put factories in non-compliance for this point as OFATMA could not offer this maternity and health insurance. With this service now being available, Better Work is assessing compliance against the law. Several factories have made other arrangements to give health insurance coverage to their workers, e.g. there are several factories that have made arrangements with private service providers which cannot easily be terminated. OFATMA is meeting enterprises individually to discuss the best

way to transition to the new government service. OFATMA also suggested a transition period for individual factory subscription to the new insurance until September 2016 with different approach for different factory situations. This suggestions is still under discussion as MAST has not validated the proposal yet.

In addition, a number of other issues remain a challenge under this compliance point. Twenty-three factories are in non-compliance for not collecting and forwarding OFATMA contributions on time.

Twelve factories have also been found non-compliant for payments of workers' and employers' contributions to ONA (pension funds). Among these, the majority of non-compliances identified relate to late payments of these contributions. The Haitian Labour Code requires that payments (six percent of the basic salary to be paid by employees and 6 percent of the basic salary to be paid by the employers) are being made within the first ten working days of each month for the previous month.

Six factories are in non-compliance for payment of 3% of workers' basic salary to OFATMA for the work-related accident insurance.

Payments of annual salary supplement or bonus has been identified as a non-compliance for five factories. This raise in the non-compliance rate is due to the fact that Better Work Haiti revised its approach on the assessment of the payment of annual salary supplement or bonus as of May 2015 in order to more accurately reflect the requirements of article 148 of the labour code after clarification from MAST.

In Focus 5: Wage Information, Use and Deduction

Question	# factories out of compliance
Does the employer keep only one accurate payroll record?	12
Does the employer properly inform workers about wage payments and deductions?	0
Has the employer made any unauthorized deductions from wages?	2

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

Two factories have also been found non-compliant under this compliance point for non-authorized deductions from workers' wages which were disguised as disciplinary actions against the provisions of the law.

F. CONTRACTS, AND HUMAN RESOURCES

In Focus 6: Termination

Question	# factories out of compliance
Does the employer compensate workers for unused paid annual leave when they resign or are terminated?	3
Does the employer comply with legal requirements before suspending workers or reducing the size of the workforce due to changes in operations, lack of materials, force majeure, or accident resulting in an immediate work stoppage?	3

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?	6
Does the employer terminate workers for reasons that are invalid under national law?	0
Has the employer complied with any orders to reinstate or compensate workers who were found to be unjustly terminated?	0

Under the compliance cluster for Contracts and Human Resources, the compliance point for Termination had the highest non-compliance rate with eight factories (32%) being in non-compliance in one or several of the questions under this compliance point. These non-compliances were mostly related to the payment of final entitlements upon termination. For instance, six factories are in non-compliance for the payment of notice period because this payment was made on the minimum wage of reference and not on average daily earnings as required by the law. Frequent changes in management team seems to have caused this issue in three out of them. Three factories are in non-compliance for the payment of unused paid annual leave when workers resign or are terminated. In the first factory, assessors found that workers with less than 3 months in the factory are not compensated for unused annual leave, while this payment was not totally accurate in the two others. Those 3 factories were also found in non-compliance for payment of the annual salary supplement or bonus upon termination for the same reasons. Three factories did not comply with legal requirements before suspending workers or reducing the size of the workforce due to changes in operations, lack of materials, force majeure, or accident resulting in an immediate work stoppage. Two factories did not consult with the union and one of them did not notify the Ministry of Labor before reducing the size of the workforce.

G. OCCUPATIONAL SAFETY AND HEALTH (OSH)

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

In Focus 7: Chemicals and Hazardous Substances

Question	# factories out of compliance
Are chemicals and hazardous substances properly labelled?	15
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?	14
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?	14
Has the employer effectively trained workers who work with chemicals and hazardous substances?	4
Has the employer taken action to assess, monitor, prevent and limit workers' exposure to chemicals and hazardous substances?	5

The absence of appropriate management systems continues to be the main reason why factories fail to ensure that chemical containers are permanently labelled, the safety data sheets (MSDS) available at any time and the inventories always kept up to date. Frequent changes of staff in charge of Occu-

pational Safety and Health (OSH) at the factories as well as the continuous use and replenishment of these substances contribute to the high rates of non-compliance in this area. Fifteen factories are in non-compliance for the labelling of chemicals and hazardous substances and six for the incorrect storage of such products. Fourteen factories do not have the necessary chemical safety data sheet available for these substances and equally fourteen factories don't have enough or not well equipped eye washing. Five factories have taken insufficient provisions to control the exposure of workers to chemical substances. These factories that use chemicals and hazardous substances do not have adequate ventilation in the workplace and workers exposed to these substances do not benefit from periodic medical examinations as required by the law. With respect to the effective training of workers who use chemicals and hazardous substances, four factories were found in non-compliance.

In Focus 8: Emergency Preparedness

Question	# factories out of compliance
Are emergency exits and escape routes clearly marked and posted in the workplace?	8
Are flammable materials safely stored?	2
Are possible sources of ignition appropriately safeguarded?	4
Are the emergency exits accessible, unobstructed and unlocked during working hours, including overtime?	12
Are there enough emergency exits?	0
Does the employer conduct periodic emergency drills?	8
Does the workplace have a fire detection and alarm system?	4
Does the workplace have adequate fire-fighting equipment?	11
Has the employer trained an appropriate number of workers to use the fire-fighting equipment?	7

Eight factories did not have evacuation plans accurately reflecting the emergency routes of the place of work and/or they did not do regular emergency drills. Better Work recommends two emergency drills per year.

In two factories, EAs found flammable materials that were not safely stored and in four factories, possible sources of ignition were not sufficiently safeguarded with mobile phones of workers being charged with cables in close proximity to flammable materials such as fabrics.

In twelve factories, Better Work found that the emergency exits were obstructed, often by boxes.

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

Seven factories did not train the recommended 10% of the workforce on the use of fire-fighting equipment.

In Focus 9: Health Services and First Aid

Question	# factories out of compliance
Do workers have a medical check within the first three months of hiring?	11
Do workers have an annual medical checks?	0

Do workers have annual medical checks?	14
Do workers who have been exposed to work-related hazards receive free health checks?	8
Does the employer address safety and health risks to pregnant or nursing workers?	1
Does the workplace have required onsite medical facilities and staff?	17
Has the employer ensured there are a sufficient number of readily accessible first aid boxes/supplies in the workplace?	5
Has the employer provided first-aid training for workers?	7

Seventeen factories in total are in non-compliance because they did not have the number of medical facilities and/ or medical personnel required by the law. Although a requirement of the legislation of the Haitian labour law, many factories chose to not hire the expected number of medical personnel, because the current demand for such services does not justify the hiring of additional staff. The Haitian legislation requires the presence of one nurse onsite in factories of 50 to 200 employees, two nurses for the factories of 200 to 500 employees, and an additional nurse for all 200 additional employees. In addition, factories with less than 200 workers must provide three weekly doctors' visits, and factories with more than 200 employees must have medical services on site at all times. The newly launched factory clinic program by Share Hope and Better Work is supposed to assist factories improve their clinics and to better use the resources they have.

Fourteen factories were non-compliant and did not organizing annual medical checks for workers and eleven factories did not organize those checks within the first three months of hiring. According to the Haitian Labor Code, annual medical examinations fall under the responsibility of the Haitian government institution OFATMA. However, these services are not sufficiently offered by OFATMA to cover existing needs. Since the launch of OFATMA's maternity and health insurance, OFATMA has shared a list with all doctors and medical service providers which are affiliated to their network. Yet, no concrete suggestion has yet been made as to how the regular medical checks of workers are to be covered. Since September 2015, the Haitian Employers Association (ADIH) started to meet with OFATMA to share their concerns with regards to the introduction of the new health and maternity insurance by OFATMA and the discussions between the institutions continue until today.

In eight factories, workers who are exposed to hazards did not receive medical attention required by the law and one factory did not address safety and health risks to pregnant or nursing workers.

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

In Focus 10: Welfare Facilities

Question	# factories out of compliance
Does the employer provide workers enough free safe drinking water?	4
Does the workplace have adequate accessible toilets?	20
Does the workplace have adequate hand washing facilities and adequate soap?	5
Does the workplace have all required facilities?	0
Does the workplace have an adequate eating area?	14

Under Welfare Facilities, non-compliance rates remain relatively high due to reasons described in

previous reports related to the number of toilets, missing soap and insufficient adequate eating areas in factories.

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

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

In Focus 11: Worker Protection

Question	# factories out of compliance
Are appropriate safety warnings posted in the workplace?	7
Are electrical wires, switches and plugs properly installed, grounded, and maintained?	6
Are proper guards installed and maintained on all dangerous moving parts of machines and equipment?	10
Are workers effectively trained and encouraged to properly use personal protective equipment and machines?	8
Are workers punished if they remove themselves from work situations that they believe present an imminent and serious danger to life or health?	1
Does the employer comply with ergonomic requirements?	8
Does the employer provide workers with all necessary personal protective clothing and equipment?	13

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

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

Seven factories have not displayed the signs necessary security on the electrical boxes and six factories have been found non-compliant because they do not provide a sufficient maintenance of their electrical installations. In effect, in these factories the evaluators observed, electrical wires exposed in the boxes or electrical equipment.

In Focus 12: Working Environment

Question	# factories out of compliance
Are noise levels acceptable?	1
Are the temperature and ventilation in the workplace acceptable?	20
Is the workplace adequately lit?	18
Is the workplace clean and tidy?	4

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

Temperature and ventilation levels were found to be too high in twenty 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 eighteen factories were found to be non-compliant on light levels which can have an impact on productivity.

Four factories were found to not be clean and tidy and only one factory continued to have noise levels exceeding the recommended maximum of 90 Db.

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

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

H. WORKING TIME

In Focus 13: Overtime

Question	# factories out of compliance
Does the employer comply with limits on overtime hours worked?	9
Does the employer obtain authorization from the Department of Labour before working on Sundays?	2
Does the employer obtain authorization from the Department of Labour before working overtime?	9
Is overtime work voluntary?	1

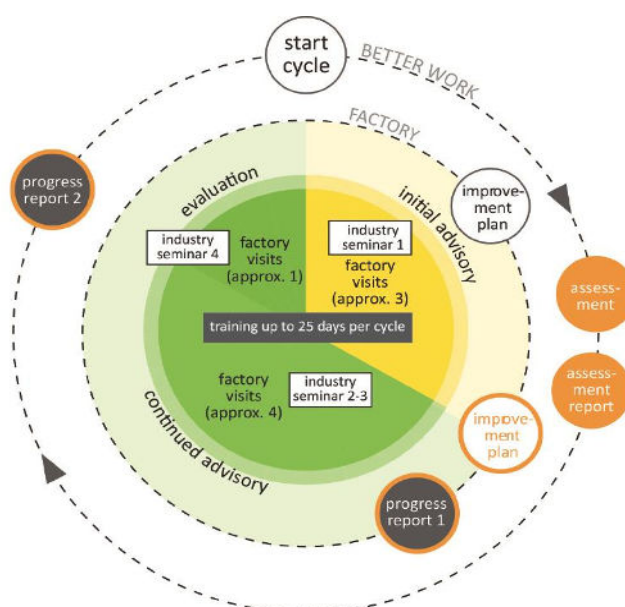
In nine factories, Better Work found sections of the factory working overtime beyond legal limits. In most cases, the sections affected by work beyond the legal limit of 80 hours per trimester are security staff and workers in shipping departments. Equally nine factories were found in non-compliance because they failed to obtain authorisation from the Ministry of Social Affairs and Labour (MAST) prior to working overtime and two factories failed to obtain that authorisation by the government prior to working on Sundays. Based on the interviews with workers and management in one factory, EAs were able to note that overtime was not voluntary at the factory. According to the workers, they could leave work after the eight hours of work but they would be punished the following day for not staying after eight hours. The management explained that the punishment is for not informing the factory that they could not stay and perform overtime work.

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 2015 to February 2016. With the rollout of the revised service delivery model by Better Work in all of its country programs, the importance of advisory services - among the three Better Work core services assessment, advisory and training services - has been emphasized even more. Better Work acknowledges the fact that auditing alone cannot contribute to sustainable remediation of non-compliances. Assessments provide a snap shot of the compliance issues, yet they do not add significant value to improvements of factories' compliance performance. Therefore, the adjustments in the services that Better Work delivers to factories provide opportunities for the program to work with factories on root causes that are underlying repeated non-compliance issues. Under the revised approach, factories undergo an initial period of advisory services in which a designated Enterprise Advisor supports the factory on a one-on-one coaching basis before the independent Better Work assessment is being carried out. In this initial advisory period, the Advisor assists the factory to set up the bipartite worker - management committee PICC (Performance Improvement Consultative Committee). Through interactive exercises, the worker-management committee identifies where the factory may need improvements in terms of labour compliance, management systems and training needs and sets targets. This work also extends to the Advisor reviewing the committee's own effectiveness. The committee then initiates and realizes early improvements. The factory is responsible for the quality of these improvements. Through this process of self-diagnosis and early remediation, Better Work aims to increase ownership, accountability, dialogue and partnership. After the 100 day period concludes, Better Work conducts its independent assessment of the factory's compliance performance. After Better Work's assessment, advisory and training services continue. The designated Enterprise Advisor continues to assist the bipartite committee to hold regular meetings, follow up on issues identified through self-diagnosis by the PICC as well as by Better Work's assessors and remediation of these issues.

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



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

In Haiti, Better Work launched the rollout of the revised model in April 2015 through an industry seminar. Subsequently, the set-up of PICC in factories continued together with the introduction of the self-diagnosis process. At the time of writing of this report, 15 factories have set up a PICC in their factory as indicated in the table below which states the status of the PICC in each of the factories participating in the Better Work program. Three PICCs are actually inactive and the assigned BW Enterprise Advisor is working with the factory to get these committees active again. In two additional factories, the set-up of the PICCs is currently in progress.

	Name of factory	PICC Status
1.	Caribbean Island Apparel S.A.	Set up and functioning
2.	CODEVI	No PICC yet, but set-up in progress
3.	Fairway Apparel S.A.	Set up but inactive
4.	Fox River Caribe, INC	Set up but inactive
5.	Global Manufacturers & Contractors S.A.	No PICC yet
6.	Goal Export S.A.	Set up and functioning
7.	H&H Textiles S.A.	No PICC yet
8.	Horizon Manufacturing S.A.	Set up and functioning
9.	Indigo Mountain Haiti S.A.	No PICC yet
10.	Interamerican Wovens S.A.	Set up and functioning
11.	Life S.A.	No PICC yet
12.	Modas BU IL Haiti S.A.	Set up but inactive
13.	MGA Haiti S.A	Set up and functioning
14.	Multiwear S.A.	Set up and functioning
15.	Isis Apparel S.A. (former One World Apparel)	Set up and functioning
16.	Pacific Sports Haiti S.A.	Set up and functioning
17.	Palm Apparel S.A.	Set up and functioning
18.	Premium Apparel S.A.	Set up and functioning
19.	Quality Sewing MFG. S.A.	No PICC yet, but set-up in progress
20.	Sewing International S.A.	No PICC yet
21.	S&H Global S.A.	Set up and functioning
22.	Textiles Youm Kwang S.A.	No PICC yet
23.	The Willbes Haitian II S.A.	No PICC yet
24.	The Willbes Haitian III S.A.	No PICC yet
25.	Val D'Or Apparel MFG Haiti S.A.	Set up and functioning

All of these factories have been trained on the use of the self-diagnosis process. However, only approximately half of the factories have submitted an initial report about their self-diagnosis which is shared with buyers as well.

In the reporting period, the first factories also produced their own progress report. As outlined in the above graph about the BW annual cycle under the revised service delivery model, the first progress report in an annual cycle is to be produced by the factories itself and no longer by Better Work. The progress report is due approximately in the 5th month of an annual cycle after the initial period of advisory services (formation of PICC, introduction of self-diagnostic process etc. over approximately 3

months) and the Better Work assessment and the publication of the assessment report. The progress report allows the factory to state its progress in remediation against non-compliance points identified by BW as well as other challenges that the factory is facing. This self-produced progress report by the factory which is being written on a BW template, is equally shared with subscribed brands. Although all of the factories should have produced their first own progress report by now, only approximately half of them have submitted their first progress report. The other half has not been able to produce the document.

Since approximately 65% of factories in the Better Work Haiti program have a PICC set up - an increase from 8% in 2014 – approximately half of advisory services are now being delivered in the form of PICC meetings. The PICC meetings which include management and worker representatives testify of a new level of social dialogue at the factory level. Better Work is supporting the process through facilitating the dialogue, yet if possible, the EA is trying to more and more move to the role of a coach letting the PICC members lead the process themselves.

As part of the revised service model, BW has also launched so called industry seminars in 2015. The purpose of these seminars is to deliver a sort of clustered advisory service to several factories at the same time on a topic of particular relevance for the sector, i.e. a topic that usually relates to relatively high non-compliance rates. Industry seminars can 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. In October 2015, BWH conducted an industry seminar on grievance mechanisms. The seminar was delivered several times in Port-au-Prince as well as in the North of the country for those factories situated there. Effective grievance mechanisms allow enterprises to be aware of issues of concerns for their employees and to tackle these before they turn into a major conflict. Industry seminars will be implemented on a quarterly basis as of 2016 with one particular topic to be covered per trimester.

3.2 Better Work Haiti Training Services

In addition to factory assessments and advisory work, the Better Work program has designed a range of trainings intended for workers, line supervisors and managers. In summer 2015, the Better Work Haiti training team conducted a survey among factories to identify training needs. One priority emerging from the survey clearly emphasized the need for more training for middle management in Haitian factories. A new training catalogue with all training modules available in Haiti was hence released and can be accessed online.¹⁰ Newly launched trainings by the Better Work team since late 2015 include workers' rights & responsibilities, negotiation skills training and a new two day long training for Human Resource Managers. Since early 2016, Better Work is also offering a training module on Industrial Relations to factories which aims at assisting factories to harmonize the relationship between management and worker representatives.

In addition, GAP Inc. released funds to four of the eight Better Work country programs for various trainings on workplace cooperation. In Haiti, these funds are being used to finance the PICC trainings, negotiation skills trainings, grievance mechanism industry seminar (to be held in October), workers' rights and responsibilities training and workplace communication.

¹⁰ http://betterwork.org/haiti/?page_id=65

The Walt Disney grant for the popular 3-day supervisory soft skills training which has been implemented in Haiti since 2014 has allowed for more than 700 supervisors to be trained so far.

In 2015, the Better Work Training Team trained 1327 participants in total in the various trainings offered to factories out of which 666 training participants were women.

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

The priorities of trainings for 2016 will be several modules focusing on improving workplace cooperation: the new IR training, the one on grievance mechanisms, a workplace communication training and the HR training.

Section IV: Conclusions and Next Steps

4.1 Conclusion

Overall, Better Work observes an increased level of engagement of all actors in the sector to contribute to improvements of the competitiveness of the Haitian garment sector. The HOPE II/HELP legislation and its recently approved extension until 2025 has opened unique opportunities for Haiti's garment industry. International textile brands have shown an increasing interest in Haiti as a sourcing destination. Several brands have been on scoping missions to Haiti in the past months, others which are already sourcing in country, are looking into expanding their supplier base in Haiti. This perspective offers a great chance for the various stakeholders of the industry to work together on improvements needed to increase the competitiveness of Haiti's garment industry in comparison with others in the region and the world. Necessary improvements comprise changes in national legislation, infrastructural challenges as well as capacity building needs of workers and middle management in the factories. The labour law reform remains a challenge due to the political situation but the ILO remains available to support its constituents in Haiti in the process. The construction of additional production space is underway but may take some time to be finalised for use. Trainings for workers and middle management are ongoing through different service providers in the sector.

The Association of the Haitian Employers, ADIH, has announced a new board of Directors in January 2016. Also, a working group for the textile sector within ADIH is now holding regular meetings to discuss issues of common concern for the industry. The union movement in Haiti continues to grow and would benefit from further capacity building from the international union movement. The maturity of Haiti's industrial relations will be crucial in order to grow this industry to the benefit of the country's socio-economic development. The further institutionalization of the social dialogue table will be of great value in this process.

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

4.2 Next Steps

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

Promoting a positive culture of change lies at the heart of Better Work's adjusted service delivery model. Its successful launch in 2015 with the majority of factories in Haiti has shown the promising success of the revised approach in which factories are taking on ownership for the improvement process. Better Work will continue to partner with factories and buyers in this process and will provide support according to each factory's need. The end of the first cycles under the revised service model is approaching in the coming months and progress reports for each factory will show the lessons learnt during this process. New cycles will be launched under the same approach to further strengthen dialogue, ownership, accountability and partnership at the enterprise level.

In 2016, Better Work is also planning to launch a pilot project on productivity enhancements in a selected number of factories. The project which has been discussed and prepared with national constituents would be a joint project by the ILO and the IFC over a duration of one year. The project combines classroom trainings for key factory staff on different productivity related topics in combination with individual enterprise level consultancy on productivity bottlenecks. Inclusion of workers in the process is ensured through the bipartite management – worker committees which are part of Better Work's service model. Impact of potential productivity improvements will be measured over time.

Moreover, Better Work is planning to replicate its successful model of the multi-stakeholders' and buyers' forum from 2015. The objective will be to tailor the event even more to the needs of the different national and international stakeholders, especially international buyers which should be represented by staff of both, their sourcing and their compliance departments. The design of the event will take these different interests into consideration.

Section V: Factories in Detail

5.1 List of factories

Since the inception of the Better Work Haiti program, factories in Haiti – unlike all other BW country program – never had to pay any fees for participation in the program. As of January 2016, Better Work Haiti introduced membership fees for factories' participation in the program in order to strengthen the sustainability of the BW program. The fees vary by factory size and cover the following services per individual factory for an annual cycle:

- Annual compliance assessment including a detailed report,
- Individual level advisory services (6-8 individual visits per year) including coaching in the use of the self-diagnosis tool and the set-up and training of a bipartite management- workers committee,
- Invitation to 4 industry learning seminars per year,

- 25 person days of training per factory per annual cycle (free choice from the BWH training catalogue),
- Participation in the annual multi-stakeholder's forum and other specific projects (e.g. new productivity project which will be launched in 2016).

Factories have to fill out a new registration form which means that the initial participation in the Better Work program is no longer automatically renewed every year.

However, as Better Work Haiti is implementing one component of the TAICNAR program which is an obligation of the HOPE law, all factories that export under HOPE II will continue to be assessed once a year and will receive some level of remediation support regardless of whether they subscribe to the Better Work Haiti program. Their compliance data will be included in these biannual compliance synthesis reports.

Below is the list of factories that have been assessed by BWH over the past 2 cycles (between March 2015 and February 2016). All factories that have been assessed by BWH more than twice are also included in the section "Factory Tables" at the end of this chapter.

Table 3: List of factories in the Haitian garment sector which have been assessed between March 2015 and February 2016

	Name of factory
1.	Caribbean Island Apparel S.A.
2.	CODEVI
3.	DKDR HAITI S.A.
4.	Fairway Apparel S.A.
5.	Fox River Caribe, INC
6.	Global Manufacturers & Contractors S.A.
7.	Goal Export S.A.
8.	H&H Textiles S.A.
09.	Horizon Manufacturing S.A.
10.	Indigo Mountain Haiti S.A.
11.	Interamerican Wovens S.A.
12.	Life S.A.
13.	Modas BU IL Haiti S.A.
14.	MGA Haiti S.A
15.	Multiwear S.A.
16.	Isis Apparel S.A.
17.	Pacific Sports Haiti S.A.
18.	Palm Apparel S.A.
19.	Premium Apparel S.A.
20.	Quality Sewing MFG. S.A.
21.	Sewing International S.A.
22.	S&H Global S.A.
23.	The Willbes Haitian II S.A.
24.	The Willbes Haitian III S.A.
25.	Val D'Or Apparel MFG Haiti S.A.

The Haitian Employers' Association (*Association des Industries d'Haiti* - ADIH) has started to update the employment figures for the garment industry on a monthly basis. Better Work Haiti is collaborating with ADIH on updating and aligning these figures regularly. In ADIH's latest publication of the figures for January 2016, 40,991 employees were registered in all Haitian factories. Yet, it has to be noted that this figure includes the administrative staff of these factories as well. From previous years of data collection, BWH knows that the administrative staff for all factories accounts to approximately 10-15% of the total employee figure. Also, in Haiti, the percentage of female factory workers among the workforce lies between 65- 70%.

5.2. Findings from the factories

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

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

- compliance needs by compliance cluster and by compliance point: black dots (●) represent non-compliance identified in the baseline assessment and non-compliance that has not yet been addressed by the factory in its improvement plan. Half-black dots (◐) represent areas where factories have made several improvements but are still in non-compliance since each compliance point is composed of several questions;
- details on the non-compliance identified by EAs: the information included in this column constitutes the issues where evidence of non-compliance was found in the last assessment conducted by Better Work at each particular factory (the date of the last assessment is equally stated for each factory on top of its table).
- improvement priorities identified by the factory;
- efforts made by the factory to remedy the compliance needs as verified in the most recent assessment or advisory visit;
- with respect to non-compliance areas that have not been remediated, the amount of time that has elapsed since the non-compliance has been first identified at this factory.

Note: Better Work is not reporting on compliance with the production wage, but is indicating the percentage of piece rate workers being paid 320 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: 2261
 Date of last BW assessment: 19-Jan-16

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

Advisory and Training Services in the past 6 months

Date Activity
 22-Oct-15 Grievance mechanism training
 23-Feb-16 1. Meeting with management to plan for the next PICC meeting to discuss the points identified in the last Better Work assessment
 2. Factory tour

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Child Labour	Child Labourers	○	○	○	○	○	○	○	○	○	○	○				
	Documentation and Protection of Young Workers	○	○	○	○	○	○	○	○	○	○	○				
	Hazardous Work	○	○	○	○	○	○	○	○	○	○	○				
	Unconditional Worst Forms	○	○	○	○	○	○	○	○	○	○	○				
Discrimination	Gender	○	○	○	○	○	○	○	○	○	○	○				
	Race and Origin	○	○	○	○	○	○	○	○	○	○	○				
	Religion and Political Opinion	○	○	○	○	○	○	○	○	○	○	○				
Forced Labour	Bonded Labour	○	○	○	○	○	○	○	○	○	○	○				
	Coercion	●	○	○	○	○	○	○	○	○	○	○				
	Forced Labour and Overtime	○	○	○	○	○	○	○	○	○	○	○				
	Prison Labour	○	○	○	○	○	○	○	○	○	○	○				
Freedom of Association and Collective Bargaining	Collective Bargaining	○	○	○	○	○	○	○	○	○	○	○				
	Interference and Discrimination	○	○	○	○	○	○	○	○	○	○	○				
	Strikes	○	○	○	○	○	○	○	○	○	○	○				
	Union Operations	○	○	○	○	○	○	○	○	○	○	○				
Compensation	Method of Payment	○	○	○	○	○	○	○	○	○	○	○				
	Minimum Wage	○	○	○	○	○	○	○	○	○	○	○				
	Overtime Wages	●	○	○	○	○	○	○	○	○	○	○				
													Payment for legally mandated holidays.	Pay legally mandated holidays according to the law.		
	Paid Leave	●	○	○	○	○	○	○	○	○	○	○	Payment for sick leave.	Pay sick leave according to the law.		
Compensation													Payment for maternity leave.	Pay maternity leave according to the law.		
	Premium Pay	○	○	○	○	○	○	○	○	○	○	○				

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Contracts and Human Resources	Social Security and Other Benefits	☐	☒	☐	☐	☐	☐	☐	☐	☒	☐	☒	Employer contribution to OFATMA for maternity and health insurance. Forwarding of workers' contributions to OFATMA.	Finalize enrollment with OFATMA in newly available health and maternity insurance. Finalize enrollment with OFATMA in newly available health and maternity insurance.		
	Wage Information, Use and Deduction	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Contracting Procedures	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Dialogue, Discipline and Disputes	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Employment Contracts	☒	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐				
	Termination	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	Labeling of chemicals and hazardous substances.	Label all containers of chemicals and hazardous substances used in the workplace.		
	Chemicals and Hazardous Substances	☒	☐	☐	☐	☒	☐	☒	☐	☐	☐	☒	Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Post all the relevant MSDS of chemicals and hazardous substances used in the workplace.		
	Emergency Preparedness	☒	☐	☐	☐	☐	☒	☐	☒	☐	☒	☐	Fire detection and alarm system. Marking or posting of emergency exits and/or escape routes in the workplace.	All buildings need to have a fire detection and alarm system. Emergency exits and escape routes need to be marked and posted.	Fire detection and alarm systems were installed in the new building. Marking and posting of the escape routes is in progress.	18
	Health Services and First Aid	☒	☐	☐	☐	☒	☐	☒	☒	☐	☐	☐				
	OSH Management Systems	☒	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐				

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Occupational Safety and Health	Welfare Facilities	●	●	●	●	●	●	●	●	●	●	●	Toilets.	Ensure that the number of toilets is compliant with the law.		30
	Worker Accommodation	○	○	○	○	○	○	○	○	○	○	○	Workplace temperature and/or ventilation.	Ensure that temperature in the workplace is acceptable.		48
	Working Environment	●	○	●	●	●	●	●	●	●	●	●	Workplace lighting.	Ensure that workplace lighting is at the minimum required level.		
													Workplace cleanliness.	Ensure that workplace is clean and tidy.		
															A system has been put in place with the mechanics to ensure that all machines have the proper guards.	18
	Worker Protection	●	○	●	●	●	●	●	○	●	●	●	Training and encouragement of workers to use PPE, machines and/or equipment safely.	Train and encourage workers to use PPE as needed.		
													Installing, grounding, and/or maintaining electrical wires, switches, and/or plugs.	Install, ground, and maintain electrical wires, switches and plugs.		
													Posting safety warnings in the workplace	Post safety warnings in the workplace as needed.		
	Leave	○	○	●	○	○	○	○	○	○	○	○				
	Overtime	●	●	○	○	●	○	○	○	○	●	○	Limits on overtime hours worked.	Comply with limits on overtime hours.		
	Regular Hours	●	●	○	○	○	○	○	○	○	○	○				

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

7th assessment	8th assessment	9th assessment	10th assessment	11th assessment
47%	34%	60%	60%	92%

CODEVI

Location: Ouanaminthe
 Number of workers: 7700
 Date of last BW assessment: 23-Nov-15

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

Advisory and Training Services in the past 6 months

Date	Activity
15-Sep-15	Meeting with CODEVI's compliance manager and MAST representatives to discuss overtime and night hours.
1-Oct-15	Training on Occupational Safety and Health awareness
27-Oct-15	1-Meeting with compliance manager to complete the self diagnosis report. Meeting with the training director to discuss the training needs and the training plan for 2016.
28-Oct-15	1-Meeting with the Health and safety manager to discuss the needs to adjust medical checks to legal requirements. 2-Meeting with the OSH Committee to present the OSH self assessment checklist and discuss the needs of the committee. 3-Meeting with the HR managers from all plants to introduce HR Management systems and HR risk assessment techniques.
3-Dec-15	1-Meeting with Health and safety committee to present OSH management systems - root cause analysis tool (Fishbone diagram). 2-Meeting with HR representatives to review progress made since last visit and present HR management systems tools.
3-Feb-16	1-Meeting with training team to discuss the training plan. 2-Meeting with compliance manager to discuss the progress report. 3-Meeting with OSH committee to review OSH issues and discuss possible involvement in PICC.
15-Mar-16	Meeting with the compliance manager to review the status of remediation actions.
16-Mar-16	Meeting with the park administrator to follow up about non compliance related to HR, leave and compensation. Meeting with the union to discuss about pending industrial relations 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	11				
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	○	●	●	●	●	○	●	●	●	●	●	Implementation of collective agreement.	Correctly apply all points of the collective bargaining agreement.		54

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Freedom of Association and Collective Bargaining	Interference and Discrimination	○	○	○	○	○	○	○	○	○	○	○	Punishing workers for participating in a strike.	Review termination policy and procedures with management staff to ensure that workers are not punished for engaging in a strike.		
	Strikes	○	○	○	○	○	○	○	○	○	○	●				
	Union Operations	○	○	○	○	○	○	○	○	○	○	○	Payment for overtime worked at night.	Overtime hours completed at night must be paid 100% above the normal wage.	12	
	Method of Payment	○	○	○	○	○	○	○	○	○	○	○				
Compensation	Minimum Wage	●	◐	◐	●	●	●	○	○	○	○	○				
	Overtime Wages	●	○	●	●	○	○	○	○	○	●	◐	Payment for weekly rest days.	Pay weekly rest day to all workers entitled to it.	48	
	Paid Leave	●	○	●	●	●	●	●	●	●	●	●				
													Payment for sick leave.	Ensure that the payment of sick leave is done accurately for all workers entitled to it.		
													Payment for maternity leave.	Ensure that the payment of maternity leave is done accurately for all workers entitled to it.		
	Premium Pay	○	○	○	●	○	○	●	●	◐	○	○	Employer contribution to OFATMA for work-related accident insurance.	Pay employer contribution to OFATMA for work-related accident insurance.	42	
	Social Security and Other Benefits	○	●	○	●	●	●	●	●	●	◐	●				
													Employer contribution to OFATMA for maternity and health insurance.	Pay employer contribution to OFATMA for maternity and health insurance.		
													Forwarding of workers' contributions to OFATMA.	Forward workers' contributions to OFATMA.		
	Wage Information, Use and Deduction	●	●	○	○	●	●	○	○	○	○	○				
	Contracting Procedures	○	○	○	○	○	○	○	○	○	○	○				

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Contracts and Human Resources	Dialogue, Discipline and Disputes	○	○	○	○	○	○	●	●	○	○	○				
	Employment Contracts	○	●	○	○	○	○	○	○	○	○	○				
	Termination	●	○	○	○	○	○	○	○	●	○	○				
Chemicals and Hazardous Substances													Labelling of chemicals and hazardous substances.	Label all chemicals and hazardous substances.		60
													Washing facilities or cleansing materials in the event of chemical exposure.	Install eye wash stations in all areas where chemicals are stored or in use.		
													Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Provide MSDS for all chemicals and hazardous substances used in the workplace.		
													Storage of chemicals and hazardous substances.			
													Assessing, monitoring, preventing and/or limiting workers' exposure to hazardous substances.	Assess, monitor, prevent and/or limit workers' exposure to hazardous substances.	The factory hired a qualified contractor to assess workers' exposure to hazardous substances.	
													Training workers who work with chemicals and hazardous substances.	Train workers who work with chemicals and hazardous substances.		

[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	11				
	OSH Management Systems												Assessment of general occupational safety and health issues in the factory.	Assessment of general occupational safety and health issues in the factory.	The factory now conducts internal monthly compliance audits. These audits cover occupational safety and health issues.	54
													Recording work-related accidents and diseases and/or submitting the record to OFATMA.	Record all work-related accidents and diseases and submit these reports to OFATMA.		
	Welfare Facilities												Toilets.	Provide the amount of toilets required by the Haitian Labour Code.		60
													Eating area.	Provide seats for all the workers during lunch time.		
													Washing facilities and/or soap.	Provide washing facilities and soap.	The factory now provides sufficient washing facilities and soap.	
	Worker Accommodation												Workplace temperature and/or ventilation.	Ensure that the temperature level in the workplace is acceptable.		
	Working Environment												Workplace lighting.	Ensure that the light levels in the workplace are acceptable.		

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Worker Protection													Providing workers with personal protective clothing and equipment.	Provide workers with personal protective clothing and equipment.		60
													Ergonomic requirements	Provide workers with chairs with backrest and ensure that standing workers are properly accomodated.		
		●	●	●	●	●	●	●	●	●	●	●	Installing guards on all dangerous moving parts of machines and equipment.	Install and maintain proper guards on all dangerous moving parts of machines.		
													Training and encouragement of workers to use machines and equipment safely.	Train and encourage workers to use machines and equipment safely.		
													Posting safety warnings in the workplace.	Post safety warnings in the workplace.		
Working Time	Leave	○	○	○	○	●	●	○	●	○	●	●	Time off for annual leave.	Provide time off for annual leave according to the law.	The factory started to send workers on annual leave for the missing days from 2015.	6
	Overtime												Limits on overtime hours worked.	Comply with limits on overtime hours worked.		48
		●	○	●	●	●	●	○	●	○	●	●	Authorization from the Department of Labour for overtime.	Obtain authorization from the Department of Labour for overtime.		
	Regular Hours	●	●	●	●	●	●	○	○	○	○	○				

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

7th assessment	8th assessment	9th assessment	10th assessment	11th assessment
51%	37%	44%	44%	68%

Fairway Apparel S.A.

Location: Port-au-Prince
 Number of workers: 520
 Date of last BW assessment: 9-Jun-15

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

Advisory and Training Services in the past 6 months

Date	Activity
23-Sep-15	PICC meeting; Preparation of self diagnosis report and discussion of other common issues at the factory.
27-Oct-15	Negotiations skills training for workers
28-Oct-15	Meeting with HR/Compliance manager to prepare factory's progress report.
22-Jan-16	Meeting with factory owner to discuss on industrial relations. Factory tour completed.
26-Jan-16	Visit at the factory to measure lux levels of new lighting installations.
23-Feb-16	Workers' Rights & Responsibilities Training
24-Feb-16	Workers' Rights & Responsibilities Training
1-Mar-16	Meeting with new compliance officer to introduce the improvement process and BW advisory services in general. Update with HR manager on progress report. Introduction meeting with Share Hope representative to general manager.
10-Mar-16	Meeting with Unions representatives to promote communication with management.
23-Mar-16	Participation in industry seminar on risk management.

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	●	○	○	○	○	○	○	○	○	○				
	Other Grounds	○	○	○	○	○	○	○	○	○	○				
	Race and Origin	○	○	○	○	○	○	○	○	○	○				
	Religion and Political Opinion	○	○	○	○	○	○	○	○	○	○				
Forced Labour	Bonded Labour	○	○	○	○	○	○	○	○	○	○				
	Coercion	○	○	○	○	○	○	○	○	○	○				
	Forced Labour and Overtime	○	○	●	○	○	○	○	○	○	○				
	Prison Labour	○	○	○	○	○	○	○	○	○	○				
Freedom of Association and Collective Bargaining	Collective Bargaining	○	○	○	○	○	○	○	○	○	○				
	Interference and Discrimination	○	○	○	○	○	○	○	○	○	○				
	Strikes	○	○	○	○	○	○	○	○	○	○				
	Union Operations	○	○	○	○	○	○	○	○	○	○				
	Method of Payment	○	○	○	○	○	○	○	○	○	○				
	Minimum Wages	○	○	○	○	○	○	○	○	○	○				
	Overtime Wages	○	○	○	○	○	○	○	○	○	○				

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
Compensation	Paid Leave	●	○	●	○	○	○	○	●	○	○				
	Premium Pay	○	○	○	○	○	○	○	○	○	○				
												Employer contribution to ONA.	Regularize back payment for employer contribution and make ongoing monthly payment to ONA on time.		42
												Forwarding of workers' contributions for social insurance funds to ONA.	Regularize back payment for workers' contribution and make ongoing monthly payment to ONA on time.		
	Social Security and Other Benefits	●	○	●	○	●	○	●	○	●	○	Employer contribution to OFATMA for maternity and health insurance.	Subscribe all workers to OFATMA for the newly available maternity and health insurance.		
												Forwarding of workers' contributions to OFATMA.	Forward workers contribution to OFATMA for maternity and health insurance		
												Payroll records.	Ensure payroll records reflect working hours recorded in attendance systems.	The factory is revising the payroll system to comply with requirements.	
	Wage Information, Use and Deduction	●	○	○	○	○	○	○	●	○	●				
	Contracting Procedures	○	○	○	○	○	○	○	○	○	○				
	Dialogue, Discipline and Disputes	○	○	●	○	○	○	●	●	●	○			No bullying or abuse of language was reported during the last assessment.	
	Employment Contracts	●	○	●	●	○	○	○	○	○	●	Employment contracts' compliance with the labour code, collective agreement and/or internal work rules.	Ensure contracts reflect regulations stipulated in internal Work rules approved by MAST.	The factory is revising the contracts to ensure there is no discrepancy with the internal work rules.	

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												Payment for unused paid annual leave upon resignation or termination.	All workers must receive full compensation for annual leave upon resignation or termination regardless of employment time.	The factory is revising its payroll system to ensure all workers receive full compensation for annual leave balance upon termination or resignation.	
	Termination	●	○	●	●	●	○	○	○	○	●	Annual salary supplement or bonus upon termination.	All workers must receive full compensation for bonus upon resignation or termination regardless of employment time.	The factory is revising its payroll system to ensure all workers receive full compensation for bonus upon termination or resignation.	
	Chemicals and Hazardous Substances	●	●	○	○	●	○	○	○	○	○				
												Firefighting equipment.	Ensure adequate firefighting equipment is maintained and accessible at the workplace at all times.	Fire fighting system is being monitored to ensure functionality at all time during working hours.	
												Marking or posting of emergency exits and/or escape routes in the workplace.	Ensure accurate and visible evacuation plan is maintained and posted in the workplace.	The factory is revising the floor plan to post a new evacuation plan on both floors.	
	Emergency Preparedness	○	●	●	●	●	○	○	○	○	○	Accessible, unobstructed, and/or unlocked emergency exits during working hours, including overtime.	Ensure all escape routes and emergency exits remain unobstructed at all time during working hours.	The factory is implementing systems to monitor emergency preparedness and ensure all escape routes remain unblocked at all time during working hours.	
	Health Services and First Aid	●	●	○	●	○	○	○	○	●	●			The factory has hired one additional nurse to comply with labour laws requirements.	
	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				
Occupational Safety and Health	Welfare Facilities											Toilets.	Provide the quantity of toilets required by the Haitian Labour code.		54
		●	●	●	●	◐	●	●	●	●	●	Eating area.	Improve the conditions of the eating area to properly accommodate the workers.	The factory is planning to rebuild the eating area to increase its capacity.	
		○	○	○	○	○	○	○	○	○	○				
	Worker Accommodation											Workplace lighting.	Increase the lighting levels in the workplace.	The factory has installed a new lighting system.	36
	Working Environment											Workplace temperature and/or ventilation.	Take actions to maintain acceptable temperatures during working hours.	A water sparkling sytem has been installed to lower the temperatures.	
		○	●	○	●	●	●	●	●	●	●	Workplace cleanliness	Ensure the workplace remains clean and tidy.	The factory has taken actions to ensure fabric wastes are removed throughout the day.	
	Worker Protection											Installing guards on all dangerous moving parts of machines and equipment.	Install guards on all dangerous moving parts of machines and equipment.		18
												Ergonomic requirements	Provide appropriate seats with backrest for all sitting workers.		
		●	●	●	●	◐	○	●	●	●	◐	Posting safety warnings in the workplace.	Ensure safety warnings are posted on all dangerous and hazardous equipment and facilities.	New warning signs have been posted on dangerous equipment and areas.	
														Back support has been provided to workers subjected to heavy lifting.	
	Leave	○	○	●	●	●	○	○	○	○	○				
	Overtime	●	●	◐	●	○	○	○	○	○	●			No workers was found to have exceeded the limit on overtime 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				
Working Time												Working time records.	Ensure working time records reflect actual hours worked.	The factory is taking actions to ensure working time recorded is matching actual work performed.	
		●	●	●	●	●	○	○	○	○	●				
	Regular Hours														

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

6th assessment	7th assessment	8th assessment	9th assessment	10th assessment
11%	0%	6.50%	40%	26%

Fox River

Location:	Port-au-Prince
Number of workers:	52
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
23-Oct-15	Discussion about improvement plan to general manager and HR manager. Planning of next PICC meeting.
21-Jan-16	Meeting with factory manager to discuss the BW registration package as of 2016.

[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	Social Security and Other Benefits										Employer contribution to ONA.	Send payment for ONA on time.	The employer forwards workers' contribution for social insurance funds to ONA	
											Collecting and forwarding workers' contributions for social insurance funds to ONA.	Send payment for ONA on time.	The employer pay its contribution to ONA on time.	
											Employer contribution to OFATMA for maternity and health insurance.	Subscribe all workers to OFATMA for the maternity and health insurance.		
											Forwarding of workers' contributions to OFATMA.	Forward workers contribution to OFATMA for maternity and health insurance.		
Contracts and Human Resources	Wage Information, Use and Deduction													
	Contracting Procedures													
	Dialogue, Discipline and Disputes													
	Employment Contracts													
	Termination												The factory complies with Haitian labour law when terminating workers.	

Compliance cluster	Compliance point	Assessment									Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9				
0														

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.

Emergency Preparedness	●○○●●○○●●●									Training workers to use the firefighting equipment.	Train at least 10% of the workforce in fire-fighting.	12
										Marking or posting of emergency exits and/or escape routes in the workplace.	Install exit light and floor marking to identify escape routes.	
										Periodic emergency drills.	Conduct evacuation simulations at least twice a year.	

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.	The factory must have at least one nurse onsite at all time during working hours.		48
											First-aid training for workers.	Provide first-Aid training for at least 10% of the workforce.		
											Annual medical checks for workers.	The factory must arrange medical checks for all workers at least once a year.		
													The factory complies with the 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 complies with the 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	9				
	OSH Management Systems	●	◐	◐	◐	○	◐	●	◐	◐	Written OSH policy.	The factory must have a written OSH policy that describes the procedures and responsibilities of staff and workers on OSH issues.		18
	Welfare Facilities	●	◐	○	○	○	○	●	◐	○	Washing facilities and/or soap.	The factory must ensure availability of soap at all time in the workplace during working hours.	The factory has taken actions to ensure soap and paper is available at all time during working hours.	
	Worker Accommodation	○	○	○	○	○	○	○	○	○				
	Working Environment	●	○	○	●	○	○	○	○	○	Installing guards on all dangerous moving parts of machines and equipment.	Install proper guards on all dangerous moving parts of machines and equipment.	The factory has provided goggles for the mechanics.	48
	Worker Protection	●	◐	●	●	◐	●	●	◐	◐	Posting safety warnings in the workplace.		The factory installed proper guards on all dangerous moving parts of machines and equipment.	
	Leave	○	○	◐	●	○	●	○	○	○			The factory ensures all electrical wires, switches, and/or plugs are well maintained.	

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	☐	☒	☐	☐	☐	☐	☐	☐	☐				
	Regular Hours	☒	☒	☒	☐	☐	☐	☐	☒	☐			The factory keeps accurate payroll records.	

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

8th assessment	9th assessment
54%	100%

Global Manufacturers & Contractors S.A.

Location: Port-au-Prince
 Number of workers: 1992
 Date of last BW assessment: 13-Oct-15

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

Advisory and Training Services

Date	Activity
27-Oct-15	Meeting with the compliance manager to discuss : 1. Better Work collaboration with MAST 2. Work session to introduce the new progress report format.
30-Nov-15	Meeting with the compliance manager to: 1. Present the new progress report format and 2. Collect information about the operational status of the factory.
25-Feb-16	Advisory meeting to discuss the progress report, general situation of the factory's operations & planning of upcoming advisory activities.

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 the minimum wage to all full time workers.	
	Overtime Wages	○	○	○	○	○	○	○	○	○	●			Overtime hours worked at night are paid correctly.	
	Paid Leave	○	○	○	○	●	○	○	○	○	○			Annual leave is paid correctly.	
	Premium Pay	○	○	○	○	○	○	○	○	○	○				

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
Compensation														Annual salary supplement or bonus is paid correctly.	12
	Social Security and Other Benefits	●	●	●	◐	●	●	○	●	◐	◐	Employer contribution to OFATMA for maternity and health insurance.	Register to OFATMA for maternity and health insurance and pay the employer contribution.		
												Forwarding of workers' contributions to OFATMA	Register to OFATMA for maternity and health insurance and forward of workers' contributions to OFATMA.		
Contracts and Human Resources	Wage Information, Use and Deduction	●	○	○	○	○	○	○	○	●	○			The factory keeps one accurate payroll record.	
	Contracting Procedures	○	○	○	○	○	○	○	○	○	○				
	Dialogue, Discipline and Disputes	○	○	○	○	○	●	◐	○	○	○				
	Employment Contracts	●	●	○	○	○	○	○	○	○	○				
	Termination	●	○	○	○	○	○	○	○	○	○				
Chemicals and Hazardous Substances												Labelling of chemicals and hazardous substances.	Label all chemicals and hazardous substances.		
												Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Post chemical safety data sheets for all chemicals and hazardous substances 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 washing facilities or cleansing materials in the event of chemical exposure		

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
Occupational Safety and Health	Emergency Preparedness											Accessible, unobstructed, and/or unlocked emergency exits during working hours, including overtime.	Ensure that exits are accessible and unlocked at all times.		54
												Firefighting equipment.	Ensure that the workplace has adequate firefighting equipment.		
												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.		
												Safeguarding possible sources of ignition.	Safeguarding possible sources of ignition		
	Health Services and First Aid													Fire detection and alarm system was purchased and installation is in progress.	54
												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.		
														All first aid boxes are accessible in the workplace. The factory provided pre-assignment and/or annual medical checks for workers.	
	OSH Management Systems											Assessment of general occupational safety and health issues in the workspace.	Conduct a self assessment of OSH issues in the workplace.		
	Welfare Facilities											Toilets.	Ensure that there are sufficient toilets in the workplace according to the requirements of the law.		54
	Worker Accommodation														
	Working Environment											Workplace temperature.	Ensure that workplace temperature is acceptable.		54
												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	10				
	Worker Protection											Providing workers with personal protective clothing and equipment.	Provide all necessary PPE to workers.		12
												Ergonomic requirements.	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.		
Working Time	Leave	●	●	●	●	●	●	●	●	●	●				
	Overtime	●	●	●	●	●	●	●	●	●	●	Limits on overtime hours worked.	Limit overtime hours to less than 80 per trimester.		54
	Regular Hours	●	●	●	●	●	●	●	●	●	●				

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

6th assessment	7th assessment	8th assessment	9th assessment	10th assessment
9%	2%	0%	0%	13%

H&H Textiles

Location: Port-au-Prince
Number of workers: 2260
Date of last BW assessment: 29-Sep-15

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

Advisory and Training Services in the past 6 months

Date	Activity
26-Oct-15	Improvement Plan introduction with new HR manager and Compliance manager. Finalizing establishment of PICC.
21-Jan-16	Meeting with compliance and HR senior team to discussed contested points on the last assessment report and actions to be taken for remediation of non-compliance issues on HR and compensation. Discussion about union relations and possible collective bargaining agreement.
2-Mar-16	Meeting with HR and compliance manager to discuss the revision on the internal work rules. introduction of factory clinic improvement program

Compliance cluster	Compliance point	Assessment			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	○	○	○				
	Gender	○	○	○				
Discrimination	Other Grounds	○	○	○				
	Race and Origin	○	○	○				
	Religion and Political Opinion	○	○	○				
Forced Labour	Bonded Labour	○	○	○				
	Coercion	○	○	○				
	Forced Labour and Overtime	○	○	○				
	Prison Labour	○	○	○				
Freddom of Association and Collective Bargaining	Collective Bargaining	○	○	○				
	Interference and Discrimination	○	○	○				
	Strikes	○	○	○				
	Union Operations	○	○	○				
	Method of Payment	○	○	○				
	Minimum Wages	○	○	○				
	Overtime Wages	○	○	○				
	Paid Leave	○	○	●	Payment for maternity leave.	Provide payment for maternity leave based on average salary.		
	Premium Pay	○	○	○				

Compliance cluster	Compliance point	Assessment			Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3				
Compensation	Social Security and Other Benefits			●	Employer contribution to ONA.	Send payment for ONA on time.		
					Forwarding of workers' contributions for social insurance funds to ONA.	Send payment for ONA on time.		
				●	Employer contribution to OFATMA for maternity and health insurance.	Subscribe all workers to OFATMA for the maternity and health insurance.		
	Wage Information, Use and Deduction			●	Forwarding of workers' contributions to OFATMA.	Forward workers contribution to OFATMA for maternity and health insurance		
Contracts and Human Resources	Contracting Procedures				Payroll records.	All payments must be properly recorded in payroll records and match attendance system for actual hours worked.		
	Dialogue, Discipline and Disputes				Disciplinary measures.	Apply disciplinary measures in accordance with labor law and provision of the internal work rules.	The factory has revised its internal work rules and application procedures.	
		●		●			The factory has adressed the issue of verbal abuse towards workers.	
	Employment Contracts				Notice of termination.	Provide adequate compensation for the notice of termination based on average salary.		12
Termination	Termination						Reason for termination is properly recorded and applied.	
							Workers are given opportunity to defend themselves upon termination.	
							Proper notice is sent to MAST prior to reductions in workforce.	
							Payment for unused paid annual leave upon resignation or termination is provided correctly.	
Termination	Termination	●	●	●			Proper notice is sent to MAST prior to suspension of workers due to lack of materials or force majeure.	
							Annual salary supplement or bonus is provided to all workers upon termination.	

Compliance cluster	Compliance point	Assessment			Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3				
Occupational Safety and Health	Chemicals and Hazardous Substances				Labelling of chemicals and hazardous substances.	Properly label and identify all chemicals and hazardous substances in use.	All chemicals and hazardous substances were properly stored.	6
					Firefighting equipment.	Ensure firefighting equipment is well maintained and remains accessible at all time during working hours.		6
	Emergency Preparedness				Periodic emergency drills.	Conduct at least two emergency drills per year.	The factory has performed at least one emergency drill since the assessment.	
							The factory has taken actions to properly maintain and store chemicals and hazardous substances.	
					Onsite medical facilities and staff.	The factory needs to hire three additional nurse to meet law requirements with regards to the number of workers at the workplace.		12
	Health Services and First Aid				Medical checks for workers upon hiring.	Provide free health checks for all workers within the first 3 months of assessment.		
					Annual medical checks for workers.	Provide free health checks for workers at least once a year		
	OSH Management Systems				Mechanisms to ensure cooperation between workers and management on OSH matters.	Ensure the OSH committee is functional and carries out their activities one regular basis.	The factory has implemented an OSH committee in two of the 4 existing production buildings. Progress is under way to recruit and train additional members for the remaining floors.	12
							The factory must perform an assessment of general occupational safety and health issues at the workplace.	
	Welfare Facilities				Toilets.	Provide additional toilets to satisfy the number of workers.		12
					Washing facilities and/or soap.	Provide soap at the factory at all time during working hours.		
					Eating area.	Increase the capacity of the eating area to satisfy a greater number of workers.		
	Worker Accommodation							

Compliance cluster	Compliance point	Assessment			Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3				
	Working Environment				Workplace temperature and/or ventilation.	Maintain acceptable temperatures at all time during working hours inside the workplace.	A new cooling system has been installed to decrease the temperature during working time.	
					Workplace cleanliness	Maintain a clean workplace during working hours.	The factory is closely monitoring waste management to ensure all areas remain clean at all time.	
	Worker Protection				Training and encouragement of workers to use PPE, machines and/or equipment safely	Provide training for all workers to use machines and equipment safely.		
Working Time	Leave						The factory provides breastfeeding breaks to workers eligible for this benefit.	
	Overtime							
	Regular Hours				Working time records.	Ensure time records reflect actual working hours.		6

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

1st assessment	2nd assessment	3rd assessment
0%	0%	6%

Horizon Manufacturing S.A.

Location: Port-au-Prince
Number of workers: 390
Date of last BW assessment: 9-Jun-15

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

Advisory and Training Services in the past 6 months

Date	Activity
8-Aug-15	Advisory of the self-diagnostic tool and Better Work's revised service delivery model.
9-Sep-15	Worker life skills training
10-Sep-15	Worker life skills training
22-Oct-15	Worker life skills training
19-Feb-16	Introduction of new BW Enterprise Advisor. Discussion on a pending issue regarding severance to be paid to the family of a worker of the factory and on overdue PICC meeting to be held at the factory
4-Mar-16	Meeting with management to discuss about the pending OSH issues in the factory as well as self diagnosis report to be submitted
8-Mar-16	Training on Workers' Rights & Responsibilities
9-Mar-16	Training on Workers' Rights & Responsibilities

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				
Compensation	Overtime Wages														
	Paid Leave														
	Premium Pay														
	Social Security and Other Benefits											Employer contribution to OFATMA for maternity and health insurance.	Enroll to OFATMA's maternity and health Insurance, collect and forward workers' contribution to OFATMA	The factory is now registered and regularly contributing to this insurance.	
	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														
	Emergency Preparedness														
	Health Services and First Aid														
	OSH Management Systems														
	Welfare Facilities														
	Worker Accommodation														
												Workplace temperature	Reduce the workplace temperature	The factory is continuing with its system of dropping water on the roof with the aim of reducing the temperature. Also, additional fans were installed on the work floor.	24
	Working Environment											Workplace lighting.	Increase the workplace lighting.	The factory installed transparent plastic fiberglass roofing sheets in order to increase the lighting.	
	Worker Protection														
	Leave														
	Overtime														
Working Time	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 (320 Gourdes as of 01st of May 2015) or more for eight hours of work (workers’ average earnings):

7th assessment	8th assessment	9th assessment	10th assessment
37%	65%	65%	45%

Indigo Mountain Haiti S.A.

Location: Port-au-Prince
 Number of workers: 236
 Date of last BW assessment: 4-Aug-15

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

Advisory and Training Services in the past 6 months

Date	Activity
25-Sep-15	Meeting with HR manager to review progress on HR and compensation issues. Planning of OSH training for committee members.
19-Nov-15	Visit at factory to meet with new HR/Compliance manager. Discussion on progress on improvement plan.
21-Jan-16	Meeting with HR Manager and Factory Owner. Discussion about registration of the factory to the BW program. Establishing new responsibilities for management staff to carry out compliance duties.
1-Mar-16	Meeting with new General manager to introduce improvement plan and define priorities.

Compliance cluster	Compliance point	Assessment							Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7				
Child Labor	Child Labourers	○	○	○	○	○	○	○				
	Documentation and Protection of Young Workers	○	○	○	○	○	○	○				
	Hazardous Work	○	○	○	○	○	○	○				
	Unconditional Worst Forms	○	○	○	○	○	○	○				
Discrimination	Gender	○	○	○	○	○	○	○				
	Other Grounds	○	○	○	○	○	○	○				
	Race and Origin	○	○	○	○	○	○	○				
	Religion and Political Opinion	○	○	○	○	○	○	○				
Forced Labour	Bonded Labour	○	○	○	○	○	○	○				
	Coercion	○	○	○	○	○	○	○				
	Forced Labour and Overtime	○	○	○	○	○	○	○				
	Prison Labour	○	○	○	○	○	○	○				
Freedom of Association and Collective Bargaining	Collective Bargaining	○	○	○	○	○	○	○				
	Interference and Discrimination	○	○	○	○	○	○	○				
	Strikes	○	○	○	○	○	○	○				
	Union Operations						○	○				
	Method of Payment	●	○	○	○	○	○	○				
	Minimum Wages	○	○	○	○	○	○	●	Payment of minimum wage for full time workers.	Ensure all workers properly log in the attendance system and receive full payment for hours worked.		
	Overtime Wages	●	●	○	○	○	○	○	Payment for ordinary overtime.	Ensure all workers receive payment accordingly to overtime hours completed.	The factory is reviewing the payroll system to ensure all working time is properly compensated.	

Compliance cluster	Compliance point	Assessment							Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7				
Contracts and Human Resources									Disciplinary measures.	Ensure all disciplinary measures are approved by MAST.	The factory has reviewed the internal work rules and is in the process of getting approval of the new procedures from MAST.	
	Dialogue, Discipline and Disputes	○	○	●	●	○	○	●	Bullying, harassment or humiliating treatment of workers.	The factory must prevent any use of abusive language within the workplace.	The factory is implementing new procedures with the objective of preventing use of abusive language.	
	Employment Contracts	○	○	○	○	○	●	●	Internal work rules.	The factory's internal work rules must be submitted to MAST for approval.	The factory has reviewed the internal work rules and is in the process of getting approval of the new procedures from MAST.	6
	Termination	○	●	○	●	○	●	●	Notice of termination.	Payment for notice upon termination must be calculated based on average salary.		6
									Payment for unused paid annual leave upon resignation or termination.	Payment for unused annual leave upon termination must be calculated based on average wages.		
									Annual salary supplement or bonus upon termination.	Payment for bonus upon termination must be calculated based on average wages.		
									Reductions in workforce size or suspensions due to changes in operations	Prior notice must be sent to MAST before mass reduction in workforce.	The factory has taken measures to ensure reason for termination is clearly stated in workers files.	

Compliance cluster	Compliance point	Assessment							Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7				
Chemicals and Hazardous Substances									Inventory of chemicals and hazardous substances used in the workplace.	Have an inventory of chemicals and hazardous substances used in the workplace.		24
									Washing facilities or cleansing materials in the event of chemical exposure.	Assess and monitor workers exposure to hazardous substances.		
											The factory has taken appropriate measures to properly label containers of chemicals and hazardous substances.	
											The factory has trained workers who work with chemicals and hazardous substances.	
Emergency Preparedness											The factory has made eye wash stations available in the workplace.	
											The factory has MSDS for all chemicals used in the workplace.	
									Firefighting equipment.	Ensure that all fire-fighting equipment are regularly inspected and well maintained.		18
									Training workers to use the firefighting equipment	At least 10% of the workforce needs to be trained to use firefighting equipment.		
									Accessible, unobstructed, and/or unlocked emergency exits during working hours, including overtime.	All emergency exits must remain unobstructed during working hours.		

Compliance cluster	Compliance point	Assessment							Details of non-compliance	Improvement Priorities	Remediation Efforts	Months	
		1	2	3	4	5	6	7					
Occupational Safety and Health	Health Services and First Aid								Medical checks for workers upon hiring.	Ensure that workers receive the appropriate medical check within first 3 months of assignment.	The factory has provided medicals checks at least twice a year for workers using chemicals and hazardous substances.	36	
									Onsite medical facilities and staff.	The factory must hire at least two nurses and arrange 3 doctor visits a week.			
									First-aid training for workers.	At least 10% of the workforce needs to be trained on delivering first aid.			
									Annual medical checks for workers.	Arrange annual medical checks for all workers at least once a year.			
	OSH Management Systems								Written OSH policy.	The factory must have a written OSH policy and post it in the workplace.		36	
									Assessment of general occupational safety and health issues in the factory.	Self assessment on OSH must be conducted on a regular basis at the factory.			
									Mechanisms to ensure cooperation between workers and management on OSH matters.	The factory must ensure a functioning OSH committee is acting in the workplace.			
	Welfare Facilities								Washing facilities and/or soap.	Ensure that there is soap for the workers.		36	
									Providing drinking water.	Provide clean and safe drinking water.			
									Toilets.	Ensure that there sufficient toilets in the workplace.			
							Eating area.	Ensure that there is an eating area and it can accommodate the workers.					
	Worker Accommodation												

Compliance cluster	Compliance point	Assessment							Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7				
	Working Environment	●	●	○	●	●	●	●	Workplace temperature.	Ensure that temperature in the workplace is acceptable.		18
									Workplace lighting.	Ensure that the workplace is adequately lit.		
	Worker Protection								Ergonomic requirements	Provide chairs with backrest to all sitting workers.		36
									Installing, grounding, and/or maintaining electrical wires, switches, and/or plugs.	Properly maintain all electrical wires and installation.		
									Posting safety warnings in the workplace.	The factory must have safety warnings posted in the area of generators and fuel tank.		
		●	●	●	●	●	●	●			The factory has provided PPEs to workers appropriately.	
											The factory has trained workers to use PPEs.	
											The factory has provided fatigue mats to all standing workers.	
											The factory has trained workers to use machines and equipment safely.	
Working Time	Leave	●	●	○	○	○	○	○				
	Overtime	●	●	○	○	○	○	○	Authorization from the Department of Labor for overtime.	The factory needs to request prior authorization from MAST to perform overtime hours.		
									Working time records.	The factory must ensure that accurate working time records are kept that reflect actual hours worked for all workers.	The factory is monitoring the attendance system to ensure that all working time is properly recorded and compensated for.	
	Regular Hours	○	●	○	○	○	○	○				

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

4th assessment	5th assessment	6th assessment	7th assessment	8th assessment
0%	0%	18%	39%	0%

Isis Apparel S.A.

Location: Port-au-Prince

Number of workers: 1457

Date of last BW assessment: 3-Nov-15

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

Advisory and Training Services in the past 6 months

Activity	Date
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22-Oct-15	Training on grievance mechanisms
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30-Oct-15	PICC Meeting to discuss reorganization of the PICC and workers'absence and lateness sanctions.
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26-Jan-16	Meeting with factory's general manager following the recent assessment and discussion about the status of the PICC and follow-up on action plan.
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[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	11				
Compensation													Employer contribution to OFATMA for maternity and health insurance.	Subscribe all workers to OFATMA for maternity and health insurance.		60
													Forwarding of workers' contributions to OFATMA.	Collect and forward workers contribution to OFATMA for maternity and health insurance.		
	Social Security and Other Benefits	●	◐	●	◐	●	●	◐	●	●	◐	◐				
															Employer contribution to ONA was sent on time Workers' contributions for social insurance funds to ONA was sent on time.	
	Wage Information, Use and Deduction	●	○	○	○	○	○	○	○	○	○	○				
Contracts and Human Resources	Contracting Procedures	○	○	○	○	○	○	○	○	○	○	○				
	Dialogue, Discipline and Disputes	○	○	○	○	○	○	○	●	○	○	○			The factory ensured that disciplinary measures comply with the law	
	Employment Contracts	○	●	●	●	○	○	○	○	○	○	○				
	Termination	○	○	●	○	○	○	○	○	○	○	○				
Chemicals and Hazardous Substances													Labelling of chemicals and hazardous substances.	Properly label all chemicals containers.		6
													Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Provide MSDSs for all chemicals in use in the workplace.		
													Washing facilities or cleansing materials in the event of chemical exposure.	Install cleansing materials throughout the workplace in the event of chemical exposure.		
													Periodic emergency drills.	Perform periodic emergency drills		30
	Emergency Preparedness	●	◐	●	◐	○	◐	◐	●	◐	◐	◐			Emergency exits and/or escape routes are clearly marked 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	11				
Occupational Safety and Health	Health Services and First Aid	●	●	●	●	●	●	●	●	●	●	●	Medical checks for workers upon hiring.	Provide pre-assignment and/or annual medical checks for workers.		60
		●	●	●	●	●	●	●	●	●	●	●	Onsite medical facilities and staff.	Provide onsite medical facilities and staff as required by law.		
													Annual medical checks for workers.	Ensure medical checks are performed for all workers at least once a year.		
	OSH Management Systems	●	●	○	○	○	○	○	○	○	○	●	Assessment of general occupational safety and health issues in the factory.	Conduct periodic assessment of OSH issues in the factory.		6
	Welfare Facilities	●	●	●	●	●	●	●	●	●	●	●	Toilets.	Increase the number of toilets as required by law.		60
	Worker Accommodation	○	○	○	○	○	○	○	○	○	○	○				
	Working Environment	●	○	○	●	○	●	●	●	●	●	●	Workplace temperature	Reduce the workplace temperature		30
													Workplace lighting.	Increase the workplace lighting.		
	Worker Protection												Installing guards on all dangerous moving parts of machines and equipment.	Install guards on all dangerous moving parts of machines and equipment.		60
		●	●	●	●	●	●	●	●	●	●	●			All electrical wires and installation were fixed and well maintained.	
															The factory trained workers to use the personal protective equipment provided.	
	Leave	○	○	○	○	○	○	○	○	○	○	○			The factory trained workers to use machines and equipment safely.	

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Working Time	Overtime	●	●	○	●	○	●	○	○	●	○	○			The factory took action to prevent any worker to perform overtime beyond the legal limit of 80 hours per trimester.	
	Regular Hours	●	◐	●	○	○	○	○	○	○	○	○				

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

8th assessment	9th assessment	10th assessment	11th assessment
3%	72%	25%	32%

Interamerican Wovens S.A.

Location: Port-au-Prince

Number of workers: 905

Date of last BW assessment: 30-Jun-15

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

Advisory and Training Services in the past 6 months

Date	Activity
30-Oct-15	Meeting with HR manager on PR and self diagnosis tool and PICC meeting
26-Jan-16	Meeting with management about state of their compliance performance including the PICC as well actions that need to be taken regarding IP and PR
24-Feb-16	Meeting with management on renewing the PICC at the factory. Meeting with union members regarding their participation in the PICC

[illegible]

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
Compensation												Employer contribution to ONA.	Pay employer contribution to ONA on time.		18
												Collecting and forwarding of workers' contributions for social insurance funds to ONA.	Collect and forward of workers' contributions for social insurance funds to ONA on time.		
	Social Security and Other Benefits	●	●	●	○	●	○	●	●	●	●	Employer contribution to OFATMA for maternity and health insurance.	The employer needs to finalize it affiliation with the OFATMA health and maternity insurance		
												Forwarding of workers' contributions to OFATMA	The employer needs to finalize it affiliation with the OFATMA health and maternity insurance		
	Wage Information, Use and Deduction	○	●	○	○	○	○	○	○	○	○				
	Contracting Procedures	○	○	○	○	○	○	○	○	○	○				
Contracts and Human Resources	Dialogue, Discipline and Disputes	○	○	○	○	●	○	●	○	○	○				
	Employment Contracts	○	●	●	●	○	○	○	○	○	○				
	Termination	●	○	○	○	●	○	○	○	○	○				

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
Chemicals and Hazardous Substances												Washing facilities or cleansing materials in the event of chemical exposure.	Provide adequate washing facilities or cleansing materials in the event of chemical exposure.		12
												Labeling of chemicals and hazardous substances.	Ensure that all chemicals and hazardous substances are labeled	All secondary chemical containers are systematically labeled	
												Chemical safety data sheets for all chemicals and hazardous substances in the workplace	Ensure that MSDS are available for all chemicals and hazardous substances used in the workplace	Chemical substances are properly stored	
												Storage of chemicals and hazardous substances.	Ensure that all chemical and hazardous substances are properly stored		
												Assessing, monitoring, preventing and/or limiting workers' exposure to hazardous substances.	The factory must assess, monitor, prevent, and limit worker's exposure to hazardous substances.		
														Workers who work with chemicals and hazardous substances were trained.	

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
Occupational Safety and Health	Emergency Preparedness											Fire detection and alarm system.	Install adequate fire detection and alarm system in the warehouse.	All exits and escape routes are marked and posted	12
												Firefighting equipment.	Install adequate firefighting equipment in the warehouse.	Fire extinguishers were installed where needed and a system was put in place to prevent obstruction	
												Accessible, unobstructed, and/or unlocked emergency exits during working hours, including overtime.	Ensure that all exits are accessible, unobstructed and unlocked during all working hours	There are 2 emergency exits in building	
												Periodic emergency drills.	Conduct periodic emergency drills		
												Medical checks for workers upon hiring.	Provide pre-assignment medical checks for workers.		54
	Health Services and First Aid											Health checks for workers who are exposed to work-related hazards.	Provide health checks for workers who are exposed to work-related hazards.		
												Onsite medical facilities and staff.	Provide onsite medical facilities and staff as required by law.		
												First aid boxes/supplies in the workplace.	Install first aid boxes/supplies in the warehouse.	A first aid box was installed in building 10.	
	OSH Management Systems											Annual medical checks for workers.	Provide annual medical checks for workers.		
												Assessment of general occupational safety and health issues in the factory.	Conduct an assessment of general occupational safety and health issues in the factory.	The factory conducts periodic assessment of OSH issues in the workplace.	

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
Welfare Facilities		●●●●●●●●●●										Toilets.	Increase the number of toilets as required by the law.		54
												Eating area.	Provide an adequate eating area.		
	Worker Accommodation	○	○	○	○	○	○	○	○	○	○				
Working Environment		○ ○ ● ● ○ ● ● ● ● ●										Workplace temperature.	Reduce workplace temperature.		24
														The light levels are appropriate in the different sections.	
Worker Protection												Providing workers with personal protective clothing and equipment.	Provide workers with the necessary PPE where needed.	Standing workers are appropriately accommodated.	30
												Training and encouragement of workers to use PPE, machines and/or equipment safely.	Train and encourage the workers to use PPE and machines safely.		
		●●●○●●●●●●										Installing guards on all dangerous moving parts of machines and equipment.	Install guards on all dangerous moving parts of machines and equipment.		
												Installing, grounding, and/or maintaining electrical wires, switches, and/or plugs.	Ensure that electrical wires and switches are installed, grounded and maintained properly.		
												Posting safety warnings in the workplace.	Appropriate safety warnings need to be posted in the workplace.		
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 for overtime is systematically requested to MAST	
												Authorization from the Department of Labour for work on Sundays.		Authorization for work on sundays is systematically requested to MAST.	
	Regular Hours	●	○	●	○	○	○	○	○	○	●			Working time records are accurate.	

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

6th assessment	7th assessment	8th assessment	9th assessment	10th assessment
12%	9%	26%	12%	14%

Modas Bu II S.A.

Location: Port-au-Prince
 Number of workers: 1050
 Date of last BW assessment: 2-Jun-15

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

Advisory and Training Services in the past 6 months

Date	Activity
2-Aug-15	Participation of factory's unionized workers in compliance information training
11-Sep-15	Meeting with Management, UTL union regarding the establishment of the a union, their complaints to management and possible resolutions
13-Oct-15	Meeting with the management of MBI as well as USDOL and buyers to follow up on the critical issues identified during the last report
17-Nov-15	Meeting with management regarding termination and FOA policies to be finalized
17-Nov-15	Meeting with management regarding progress made on IP
29-Jan-16	1.Meeting with the HR manager regarding the non-operating PICC and OSH committees, the dismissal of a union worker and the improvement plan and progress made. 2. Factory tour
19-Feb-16	Meeting with Management regarding freedom of association. Discussion on need to reinforce the PICC.

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

Compliance cluster	Compliance point	1	2	3	4	Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
Freedom of Association and Collective Bargaining	Interference and Discrimination	☐	☐	☐	☒	Termination or non-renewal of worker's employment contract due to union membership or activities.	Reinstate workers terminated due to union membership or activities.	The factory agreed to rehire one terminated union representative.	
	Strikes	☐	☐	☐	☐				
	Freedom to Associate	☐	☐	☒	☒	Freedom to form a union.	Allow workers to freely form a union.		6
	Union Operations	☐	☐	☐	☐				
	Method of Payment	☐	☐	☐	☐				
Compensation	Minimum Wage	☐	☐	☐	☒	Payment of minimum wage for full time workers.	Factory must comply with the minimum wage increase.	The factory paid back pay for the new minimum wages to all full time workers.	
	Overtime Wages	☐	☐	☐	☒	Payment for ordinary overtime.	Factory must pay workers correctly for ordinary overtime.	Both the punching and payroll system were installed and adjusted to ensure that all hours are recorded an paid accordingly.	
	Paid Leave	☒	☐	☐	☐				
	Premium Pay	☐	☐	☐	☐				
						Employer contribution to OFATMA for work-related accident insurance.	Employer must forward contribution to OFATMA regularly and in a timely manner.		
	Social Security and Other Benefits	☒	☐	☐	☒	Employer contribution to OFATMA for maternity and health insurance.	Employer must forward contribution to OFATMA regularly and in a timely manner.		
						Forwarding of workers' contributions to OFATMA.	Employer must forward contribution to OFATMA regularly and in a timely manner.		
	Wage Information, Use and Deduction	☐	☐	☐	☒	Payroll records.	Factory must ensure that there is one accurate payroll in the work place.	Both the punching system and payroll system were installed and adjusted to ensure that all hours are recorded an paid accordingly.	

Compliance cluster	Compliance point	Details of non-compliance				Improvement Priorities	Remediation Efforts	Months	
		1	2	3	4				
Contracts and Human Resources	Contracting Procedures								
	Dialogue, Discipline and Disputes								
	Employment Contracts						The factory informed MAST before any workforce reductions.		
	Termination						The factory implemented a new HR procedure which will provide workers the opportunity to defend themselves prior to termination.		
Chemicals and Hazardous Substances						Washing facilities or cleansing materials in the event of chemical exposure.	Have eye wash bottles near places in the workplace where chemicals are being used.	Eye wash stations were installed as needed.	18
								The factory ensures that there are more frequent and regular trainings for workers who work with chemicals.	
						Fire detection and alarm system.	Ensure that there are functioning fire detection and alarm systems.		18
						Periodic emergency drills.	Factory must conduct period emergency drills.	Fire drills were conducted in June and November 2015	
Emergency Preparedness						Safe guarding possible sources of ignition.	All possible sources of ignition must be safe guarded.	This practice has been abolished in the factory. Management now prohibits people from charging their phones near the boiler	
								Escape routes are marked and posted.	

Compliance cluster	Compliance point					Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4				
Occupational Safety and Health						Onsite medical facilities and staff.	Ensure that there is a sufficient number of onsite medical staff.		18
	Health Services and First Aid	●	◐	●	◐			The factory implemented the required medical checks for workers. At least 10% of the workforce are trained in first aid. Health checks are provided to workers exposed to work related hazards and chemicals.	
	OSH Management Systems	●	◐	○	●	Assessment of general occupational safety and health issues in the factory.	The factory must conduct an assessment of general occupational safety and health issues in the factory.	Monthly assessments are now done by the compliance officer.	
						Toilets.	Ensure that the number of toilets complies with the requirements of the law.		18
	Welfare Facilities	●	●	●	◐	Providing drinking water.	Test the water quality on a regular basis.	Monthly tests are now conducted by the factory. The factory ensures that there is adequate soap in the workplace.	
	Worker Accommodation	○	○	○					

Compliance cluster	Compliance point	1	2	3	4	Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
	Working Environment					Workplace temperature and/or ventilation.	The factory must ensure that the temperature in the workplace is acceptable.		
		●	◐	○	●	Workplace lighting.	The factory needs to ensure that there is the appropriate lux level in all sections.	The factory installed new lights to ensure compliance.	
	Worker Protection					Training and encouragement of workers to use the personal protective equipment provided.	Train and encourage workers to use the personal protective equipment provided.	Regular training are conducted for workers using PPE.	18
						Providing workers with personal protective clothing and equipment.	Appropriate PPE must be provided to workers as no cost where needed.		
Working Time		●	●	◐	◐	Posting safety warnings in the workplace.	Appropriate safety warnings must be posted in the workplace where needed.	Safety warnings were posted on the electrical boxes as needed	
								The use of chemicals was reduced throughout the workplace. The workers were given the appropriate masks as needed.	
	Leave	○	●	●	○			Workers are trained to use Time off for breastfeeding breaks is now provided.	
	Overtime	●	○	●	○			The factory has requested authorization to MAST prior to working overtime and Sundays.	
	Regular Hours	○	●	○	○				

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

Compliance cluster	Compliance point	Details of non-compliance				Improvement Priorities	Remediation Efforts	Months
		1	2	3	4			
1st assessment	2nd assessment	3rd assessment		4th assessment				
1%	21%	20%		59%				

MGA Haiti S.A.

Location: Port-au-Prince
 Number of workers: 1004
 Date of last BW assessment: 21-Jul-15

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

Advisory and Training Services in the past 6 months

Date	Activity
9-Sep-15	Workers life skills training
10-Sep-15	Workers life skills training
11-Sep-15	Advisory on the set up and use of the self diagnosis tool. Preparation of the first self diagnosis report.
12-Nov-15	Meeting with the plant manager and the HR manager and the USDOL to follow up on the implementation of the FOA policy recently elaborated by the factory.
16-Nov-15	Meeting with HR managers and line supervisors to present the new FOA policy elaborated by the factory.
21-Jan-15	Meeting HR and Compliance managers to discuss compliance performance of the factory and to also assess the state of PICC and OSH committees.

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Child Labour	Child Labourers	○	○	○	○	○	○	○	○	○	○	○				
	Documentation and Protection of Young	○	○	○	○	○	○	○	○	○	○	○				
	Hazardous Work	○	○	○	○	○	○	○	○	○	○	○				
	Unconditional Worst Forms	○	○	○	○	○	○	○	○	○	○	○				
Discrimination	Gender	○	○	○	○	○	○	○	○	○	○	○				
	Other Grounds	○	○	○	○	○	○	○	○	○	○	○				
	Race and Origin	○	○	○	○	○	○	○	○	○	○	○				
	Religion and Political Opinion	○	○	○	○	○	○	○	○	○	○	○				
Forced Labour	Bonded Labour	○	○	○	○	○	○	○	○	○	○	○				
	Coercion	○	○	○	○	○	○	○	○	○	○	○				
	Forced Labour and Overtime	○	○	○	○	○	○	○	○	○	○	○				
	Prison Labour	○	○	○	○	○	○	○	○	○	○	○				
Freedom of Association and Collective Bargaining	Collective Bargaining	○	○	○	○	○	○	○	○	○	○	○				
	Interference and Discrimination	○	○	○	○	○	●	◐	○	○	○	○				
	Strikes	○	○	○	○	○	○	○	○	○	○	○				
	Union Operations	●	○	○	○	○	○	○	○	○	○	○				
	Method of Payment	○	○	○	○	○	○	○	○	○	○	○	Wage payment directly to workers at the workplace on working days.	Ensure that all workers are paid directly at the workplace and during working days.		
	Minimum Wage	○	○	○	○	○	○	○	○	○	○	○	Payment of minimum wage for full time workers.	Ensure that all full time workers are paid at least minimum wage.		

Compliance cluster	Compliance point	Assessment	Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1234567891011				
Compensation	Overtime Wages		Payment for ordinary overtime. Ensure that workers are paid 50% above normal overtime.			
			Payment for overtime worked at night. Ensure that workers are paid 100% above normal wage for overtime worked at night.			
	Paid Leave		Payment of sick leave. Ensure that payment for sick leave is based on average earning of the workers and not on minimum wage.		Workers are paid correctly for annual leave.	6
			Payment of maternity leave. Ensure that payment for maternity leave is based on average earning of the workers and not on minimum wage.			
	Premium Pay		Employer contribution to ONA. Forward employer's contribution to ONA.			
			Collecting and forwarding workers' contributions for social insurance funds to ONA. Collect and forward workers' contributions for social insurance funds to ONA.			
	Social Security and Other Benefits		Employer contribution to OFATMA for maternity and health insurance. Forward employer's contribution to OFATMA for maternity and health insurance.			
			Forwarding of workers' contributions to OFATMA. Forward workers' contributions to OFATMA.			
	Wage Information, Use and Deduction		Payroll records. Ensure that the factory keeps one accurate payroll records.			
	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	11				
Contracts and Human Resources	Termination	●	○	○	○	○	●	●	○	○	○	●	Reduction in workforce size or suspension due to change in operations.	Ensure that unions in the factory are consulted in case of temporary or permanent suspension due to lack of work. Ensure that MAST is notified of suspension of workers.		
													Labeling of chemicals and hazardous substances.	Properly label all chemicals and hazardous substances used in the workplace.		12
	Chemicals and Hazardous Substances	●	◐	●	◐	●	●	◐	○	●	◐	●	Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Ensure that chemical safety data sheets are available in all locations where chemicals and hazardous substances are in use or stored in the workplace.		
													Washing facilities or cleansing materials in the event of chemical exposure.	Provide accessible cleansing materials in all areas where chemicals are being used or stored for use in the event of accidental exposure.		
	Emergency Preparedness	●	◐	●	◐	●	◐	◐	●	◐	◐	◐	Accessible, unobstructed, and/or unlocked emergency exits during working hours, including overtime.	Ensure that all exits and escape routes remain unblocked during working time.	The factory ensured that all fire-fighting equipment is available and functioning.	60

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Occupational Safety and Health	Health Services and First Aid	●	◐	●	●	●	●	◐	◐	◐	●	◐	Onsite medical facilities and staff.	Comply with the number of medical staff required by the law.		60
													Pre-assignment and/or annual medical checks for workers.	Provide pre-assignment and/or annual medical checks for workers.		
													First aid boxes/supplies in the workplace.	Ensure that first aid boxes are adequately equipped according the inventory list posted on them.		
															The factory provides health checks twice a year for workers who are exposed to work-related hazards.	
	OSH Management Systems	●	◐	◐	●	◐	●	◐	●	◐	◐	◐	Providing drinking water.	Ensure that drinking water is available at all time for workers during working hours.		60
	Welfare Facilities	●	◐	◐	◐	●	◐	◐	◐	●	◐	●	Toilets.	Provide the number of toilets required by the Haitian Labour code.		
													Eating area.	Provide an eating area to accommodate the workers.		
	Worker Accommodation	◐	◐	◐	◐	◐	◐	◐	◐	◐	◐	◐	Workplace temperature.	Reduce the temperature in the workplace.		48
	Working Environment	◐	◐	●	◐	●	◐	◐	◐	◐	◐	●	Workplace lighting.	Increase the 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	10	11				
Worker Protection													Providing workers with personal protective clothing and equipment.	Provide all workers using chemicals and mechanic shop with the appropriate protection equipment.		60
													Installing, grounding, and/or maintaining electrical wires, switches, and/or plugs.	The factory ensure that all electrical installations are safely maintained to prevent electrical shocks.		
	Worker Protection	●	●	●	●	●	●	●	●	●	●	●			The factory provides chairs with backrest to all workers. The factory ensures that all machines and equipment have appropriate guards installed.	
Working Time	Leave	○	○	●	○	●	○	○	○	○	○	○	Limits on overtime hours worked.	Comply with the limit of overtime hours worked set by the law.		6
	Overtime	●	●	○	●	○	●	○	○	○	○	●			The factory now requests authorization from MAST when there is a need for overtime hours. The factory now requests authorization from MAST when there is a need to work on Sundays.	
	Regular Hours	●	●	○	●	○	○	●	○	○	○	○				

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

8th assessment	9th assessment	10th assessment	11th assessment
89%	85%	85%	95%

Multiwear S.A.

Location: Port-au-Prince
Number of workers: 1798
Date of last BW assessment: 27-Oct-15

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

Advisory and Training Services

Date	Activity
4-Oct-15	Training: Supervisory Skills Training
28-Oct-15	Meeting with compliance manager to discuss the findings of last assessment and develop improvement plan.
29-Oct-15	PICC Meeting; Discussion on payroll issues and last assessment findings.
17-Nov-15	Meeting with compliance manager to assist with completion of the factory's Progress Report.
15-Jan-16	Meeting with compliance manager to discuss disputed findings from the last assessment report.
26-Feb-16	Meeting with general manager to update on reduction plan and ONA payment.

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Child Labour	Child Labourers	○	○	○	○	○	○	○	○	○	○	○				
	Documentation and Protection of Young Workers	○	○	●	○	○	○	○	○	○	○	○				
	Hazardous Work	○	○	○	○	○	○	○	○	○	○	○				
	Unconditional Worst Forms	○	○	○	○	○	○	○	○	○	○	○				
Discrimination	Gender	○	○	○	○	○	○	○	○	○	○	○				
	Other Grounds	○	○	○	○	○	○	○	○	○	○	○				
	Race and Origin	○	○	○	○	○	○	○	○	○	○	○				
	Religion and Political Opinion	○	○	○	○	○	○	○	○	○	○	○				
Forced Labour	Bonded Labour	○	○	○	○	○	○	○	○	○	○	○				
	Coercion	●	○	○	○	○	○	○	○	○	○	○				
	Forced Labour and Overtime	○	○	○	○	○	○	○	○	○	○	○				
	Prison Labour	○	○	○	○	○	○	○	○	○	○	○				
Freedom of Association and Collective Bargaining	Collective Bargaining	○	○	○	○	○	○	○	○	○	○	○				
	Interference and Discrimination	○	○	○	○	●	○	○	○	○	○	○				
	Strikes	○	○	○	○	○	○	○	○	○	○	○				
	Union Operations	●	○	○	○	○	○	○	○	○	○	○				
	Method of Payment	○	○	○	○	○	○	○	○	○	○	●	Regular and timely payment of wages.	Ensure workers wages are paid on time.		
	Minimum Wages	○	○	○	○	○	○	○	○	○	○	○				
	Overtime Wages	●	◐	○	○	○	○	○	○	○	○	●			The factory has adjusted the payment system to ensure overtime is paid correctly.	

Compliance cluster	Compliance point	Assessment	Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1 2 3 4 5 6 7 8 9 10 11				
Compensation	Paid Leave	● ●○ ○ ○ ○ ○ ● ○ ● ○ ●	Payment for annual leave.	Ensure payment for all leave are calculated on an average base.		
			Payment for sick leave.	Payment for sick leave must be calculated on an average base.		
			Payment for maternity leave.	Payment for maternity leave must be calculated on an average base.		
	Premium Pay	○ ○ ○ ○ ○ ○ ○ ○ ○ ● ○			The factory has adjusted the payment system to ensure that overtime is paid correctly.	
	Social Security and Other Benefits	● ● ● ● ● ●○ ○ ● ●○ ● ●	Employer contribution to ONA.	Forward employer's contribution to ONA on time.		18
			Forwarding of workers' contributions for social insurance funds to ONA.	Forward worker's contribution to ONA on time.		
			Employer contribution to OFATMA for maternity and health insurance.	Subscribe all workers to OFATMA for maternity and health insurance.		
			Forwarding of workers' contributions to OFATMA.	Collect and forward workers contribution to OFATMA for maternity and health insurance.		
			Payment of annual salary supplement or bonus.	Ensure that all payment of wages are paid on an average basis.		
	Wage Information, Use and Deduction	○ ○ ○ ○ ○ ● ○ ○ ○ ○ ○				
Contracts and Human Resources	Contracting Procedures	○ ○ ○ ○ ○ ○ ○ ○ ○ ○ ○				
	Dialogue, Discipline and Disputes	○ ○ ○ ● ○ ○ ● ○ ○ ○ ●	Bullying, harassment or humiliating treatment of workers.	The factory must prevent any use of abusive language towards workers.		
	Employment Contracts	● ●○ ● ● ○ ○ ○ ○ ○ ○ ○				
	Termination	○ ○ ○ ○ ● ● ○ ○ ● ● ○ ○				

Compliance cluster	Compliance point	Assessment	Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
Occupational Safety and Health		1 2 3 4 5 6 7 8 9 10 11				
					Cleaning materials are provided for workers using hazardous substances in case of contamination.	6
	Chemicals and Hazardous Substances	● ● 1/2 ● ● ● ● 1/2 ○ ● 1/2 ○			All chemicals are stored in a properly ventilated area with secondary containment to prevent spills.	
					MSDSs are available and posted for all chemicals in use in the workplace.	
	Emergency Preparedness	● ● 1/2 ● ● ● ● 1/2 ○ ● 1/2 ●	Accessible, unobstructed, and/or unlocked emergency exits during working hours, including overtime.	Ensure all exits and escape routes remain unobstructed at all time during working hours.	Adequate fire detection and alarm system was installed in warehouses of building 37 and 47.	12
	Health Services and First Aid	● ● 1/2 ● ● ● ● 1/2 ● 1/2 ● ● ●	Annual medical checks for workers.	Ensure that all workers receive a medical check at least once a year.	The factory hired one additional nurse to meet labor law requirements with regards to the number of medical staff.	60
	OSH Management Systems	● ● 1/2 ○ ● ○ ○ ○ ○ ○ ○ ○ ○				
			Toilets.	Provide the number of toilets required by the Haitian Labour code.		60
			Eating area.	Provide an eating area to accommodate the workers.		
	Welfare Facilities	● ● 1/2 ● ● ● ● 1/2 ● 1/2 ● ● ●			The factory provided enough soap and paper in restrooms at the factory.	
					The factory took actions to ensure that dust and waste is removed continuously to ensure cleanliness during working hours.	
	Worker Accommodation	○ ○ ○ ○ ○ ○ ○ ○ ○ ○ ○ ○				

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
	Working Environment												Workplace temperature.	Reduce the temperature in the workplace.		36
													Workplace lighting.	Adequately light the workplace.		
	Worker Protection												Training and encouragement of workers to use PPE, machines and/or equipment safely.	The factory must Train and encourage workers to use PPE, machines and/or equipment safely.		60
													Ergonomic requirements.	Provide fatigue mats to all standing workers and chairs with back rest for all sitting workers		
													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.		
Working Time	Leave															
	Overtime														The factory has taken actions to prevent any worker from working overtime beyond the legal limit of 80 hours per trimester.	
	Regular Hours															

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

7th assessment	8th assessment	9th assessment	10th assessment	11th assessment
9%	78%	54%	74%	66%

Pacific Sports S.A.

Location: Port-au-Prince

Number of workers: 1686

Date of last BW assessment: 9-Jul-15

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

Advisory and Training Services in the past 6 months

Date	Activity
27-oct.-15	Negotiation Training
29-janv.-15	1. Meeting with Compliance manager regarding latest compliance progress made and need to better structure the PICC 2. Factory tour
18-févr.-16	Meeting with the chair of the PICC to plan for the next meeting Review of all pending non compliances and progress made Factory tour
19-févr.-16	PICC meeting with discussion on new members to be added in the PICC and on role of PICC members in regards to helping management.
23-Mar-16	Participation in industry seminar on risk management.

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

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

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

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
	Working Environment												Workplace temperature.	Reduce workplace temperature.		48
													Workplace lighting.	Improve workplace lighting.		
	Worker Protection															
	Leave															
Working Time	Overtime												Limits on overtime hours worked.	Comply with the legal limits on overtime.	Overtime hours are monitored and limited to 80 hours per trimester	12
	Regular Hours															

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

7th assessment	8th assessment	9th assessment	10th assessment	11th assessment
5%	90%	52%	60%	84%

Palm Apparel S.A.

Location: Port-au-Prince
 Number of workers: 1566
 Date of last BW assessment: 5-Aug-15

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

Advisory and Training Services in the past 6 months

Date	Activity
14-Oct-15	PICC meeting on chemical management systems principles and relevant non compliance issues.
12-Feb-16	1. Meeting with management to discuss the advisory plan for this year and areas where improvements are needed. 2. Meeting with a member of the PICC to discuss the date and the agenda of the next PICC meeting. 3. Factory tour
18-Feb-16	Negotiation skills training
26-Feb-16	Meeting on progress made by the factory during the advisory cycle and discussions with the chair of the PICC in order to plan the next meeting

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Child Labour	Child Labourers															
	Documentation and Protection of Young Workers															
	Hazardous Work															
	Unconditional Worst Forms															
Discrimination	Gender															
	Race and Origin															
	Religion and Political Opinion															
Forced Labour	Bonded Labour															
	Coercion															
	Forced Labour and Overtime															
	Prison Labour															
Freedom of Association and Collective Bargaining	Collective Bargaining															
	Interference and Discrimination															
	Strikes															
	Union Operations															
	Method of Payment															
	Minimum Wage															
	Overtime Wages		Payment for overtime hours worked on holidays. Payment of overtime worked on holidays must comply with the law. Changes were made in the payroll system. The payment of overtime worked on holidays is compliant with 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	11				
Compensation	Paid Leave	○	○	○	○	○	○	○	○	○	○	●	Payment for sick leave.	Payment for sick leave must comply with the law.	Changes were made in the payroll system. The payment of sick leave is compliant with the law.	
													Payment for maternity leave.	Payment for maternity leave must comply with the law.	Changes were made in the payroll system. The payment of sick leave is compliant with the law.	
	Premium Pay	○	○	○	○	○	○	○	○	○	○	○				
															Employer contribution was sent to ONA on time.	6
Contracts and Human Resources	Social Security and Other Benefits	●	◐	◐	●	○	●	○	○	○	●	◐	Employer contribution to OFATMA for maternity and health insurance.	Employer must finalize its affiliation to OFATMA health and maternity insurance.		
													Forwarding of workers' contributions to OFATMA.	Employer must finalize its affiliation to OFATMA health and maternity insurance.		
	Wage Information, Use and Deduction	●	○	○	○	○	○	○	○	○	○	○				
	Contracting Procedures	○	○	○	○	○	○	○	○	○	○	○				
Contracts and Human Resources	Dialogue, Discipline and Disputes	○	○	○	●	●	○	○	○	○	○	○				
	Employment Contracts	●	●	◐	●	○	○	○	○	●	○	○				
	Termination	○	●	○	○	○	○	○	○	◐	○	○				
	Chemicals and Hazardous Substances	●	◐	◐	●	◐	◐	◐	●	◐	○	○				
	Emergency Preparedness	●	◐	◐	●	◐	○	●	◐	◐	○	○				

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

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

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

7th assessment	8th assessment	9th assessment	10th assessment	11th assessment
49%	68%	31%	62%	91%

Premium Apparel S.A.

Location: Port-au-Prince
Number of workers: 1978
Date of registration: 28-Oct-09
Date of last BW assessment: 6-Oct-15

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

Advisory and Training Services

Date	Activity
8-Oct-15	PICC: Discussion about rules and responsibilities & engagement of members as well as introduction of self diagnosis tool and process.
27-Oct-15	Training on Negotiation Skills
18-Feb-16	PICC Meeting to discuss cafeteria, toilets doors and unions representatives movements.
24-Mar-16	Participation in industry seminar on risk management

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

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Compensation	Paid Leave	●	○	○	○	○	○	○	○	○	○	●	Payment for sick leave.	Ensure that payment for sick leave is accurate.		
													Payment for maternity leave.	Ensure that payment for maternity leave is accurate.		
	Premium Pay	○	○	○	○	○	○	○	○	○	○	○				
	Social Security and Other Benefits	●	●	◐	●	●	◐	◐	○	●	○	●	Employer contribution to OFATMA for maternity and health insurance.	Pay employer contribution to OFATMA for maternity and health insurance.		
													Forwarding of workers' contributions to OFATMA.	Forward workers' contributions to OFATMA.		
	Wage Information, Use and Deduction	○	●	○	○	○	○	○	○	○	●	●	Payroll records.	Keep one complete and accurate payroll record for all workers.		6
Contracts and Human Resources	Contracting Procedures	○	○	○	○	○	○	○	○	○	○	○				
	Dialogue, Discipline and Disputes	○	○	○	○	○	○	○	○	○	●	○			Disciplinary measures are compliant with the factory's internal work rules.	
	Employment Contracts	○	●	●	●	◐	○	○	○	○	○	○				
	Termination	●	○	●	○	○	○	○	○	○	○	○				
	Chemicals and Hazardous Substances	●	◐	●	○	○	○	◐	○	○	○	○				
	Emergency Preparedness	●	○	●	◐	◐	○	◐	○	○	○	●	Accessible, unobstructed, and/or unlocked emergency exits during working hours, including overtime.	Keep all emergency exits accessible, unobstructed, and/or unlocked during working hours, including overtime.		

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Occupational Safety and Health	Health Services and First Aid												Onsite medical facilities and staff.	Provide onsite medical facilities and staff as required by the law.		60
													Annual medical checks for workers.	Provide pre-assignment and/or annual medical checks for workers.	OFATMA has started to provide medical checks to workers. The factory is also using Bernard Mevs Hospital for the medical checks.	
		●	●	●	●	●	●	●	●	●	●	●	Health checks for workers who are exposed to work-related hazards.	Provide health checks for workers who are exposed to work-related hazards.	The factory trained 10 percent of the workforce in first-aid.	
	OSH Management Systems	○	●	○	○	○	○	○	○	○	●	○				
	Welfare Facilities												Toilets.	Increase the number of toilets as required by law.		60
		●	●	●	●	●	●	●	●	●	●	●	Washing facilities and/or soap.	Provide adequate washing facilities and/or soap in both production areas.		
													Eating area.	Ensure that the eating area can accomodate all workers.		
	Worker Accommodation	○	○	○	○	○	○	○	○	○	○	○				
	Working Environment												Workplace temperature and/or ventilation.	Ensure that workplace temperature and/or ventilation is adequate.		
		●	●	●	●	●	●	●	●	●	○	●				
	Worker Protection	●	●	●	●	●	●	●	○	○	○	○	Workplace lighting.	Improve 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	11				
Working Time	Leave	○	○	●	●	●	●	○	●	●	●		Time off for breastfeeding breaks.	Provide time off for breastfeeding breaks to all eligible workers.	The factory has created a form to ensure that all nursing women are aware of their entitlement for the breastfeeding break.	12
	Overtime	●	●	●	●	○	●	○	●	○	●	●	Limits on overtime hours worked. Authorization from the Department of Labour for overtime.	Comply with limits on overtime hours worked set by the law. Request authorization from the Department of Labour for overtime.		6
	Regular Hours	●	●	●	●	●	○	○	○	○	●	○			The employer keeps complete and accurate time records for all workers.	

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

7th assessment	8th assessment	9th assessment	10th assessment	11th assessment
25%	17%	37%	37%	24%

Quality Sewing Manufacturing S.A.

Location: Port-au-Prince
 Number of workers: 451
 Date of last BW assessment: 23-Jun-15

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

Advisory and Training Services in the last 6 months

26-Feb-16 Meeting with management to discuss about compensation issues and training plan for PICC representatives and supervisors.
 19-Mar-16 PICC training
 23-Mar-16 Participation in industry seminar on risk management

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Child Labour	Child Labourers															
	Documentation and Protection of Young Workers															
	Hazardous Work															
	Unconditional Worst Forms															
Discrimination	Gender															
	Race and Origin															
	Religion and Political Opinion															
Forced Labour	Bonded Labour															
	Coercion															
	Forced Labour and Overtime															
	Prison Labour															
Freedom of Association and Collective Bargaining	Collective Bargaining															
	Interference and Discrimination															
	Strikes															
	Union Operations															
	Method of Payment															
													Payment of minimum wage for full time workers.	Pay at least minimum wage to all full time workers.		6
	Minimum Wage													The factory pays at least minimum wage to temporary workers.		
															The factory pays at least minimum wage to apprentices.	
	Overtime Wages												Payment for ordinary overtime.	Pay all workers 50% above normal wage for ordinary overtime worked.		6

Compensation

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months	
		1	2	3	4	5	6	7	8	9	10	11					
Compensation	Paid Leave	●	○	○	○	○	○	○	●	○	○	●	Payment for weekly rest days.	Pay workers correctly for weekly rest days.			
	Premium Pay	○	○	○	○	○	○	○	○	○	○	○					
	Social Security and Other Benefits	○	●	○	○	○	○	●	○	●	○	●	Employer contribution to OFATMA for maternity and health insurance.	Enroll to OFATMA maternity and health Insurance, collect and forward workers' contribution to OFATMA			
													Payroll records.	Keep one accurate payroll record.		42	
	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	○	○	○	○	○	●	○	●	●	●	○					
Contracts and Human Resources															The factory specifies terms and conditions of employment in all employees' contracts.	6	
															The factory provides contracts for all workers including temporary workers and apprentices.		
	Employment Contracts	○	●	◐	◐	○	◐	○	○	○	○	●	●	Employment contract's compliance with the labor code, collective agreement and/or internal work rules	Ensure that apprentices' contracts are approved by MAST and that they are align with the internal work rules of the factory in terms of payment.	The factory has developed internal work rules which are approved by MAST.	
	Termination	○	●	◐	○	◐	○	○	●	○	○	●	○				

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Chemicals and Hazardous Substances		○	◐	◐	◐	◐	●	◐	◐	●	●	●	Labelling of chemicals and hazardous substances.	Label all chemicals and hazardous substances.		54
													Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Display chemical safety data sheets for all chemicals and hazardous substances in the workplace.		
													Washing facilities or cleaning materials in the event of chemical exposure.	Provide washing facilities or cleaning materials in the event of chemical exposure		
Emergency Preparedness		●	◐	◐	◐	◐	◐	◐	●	◐	●	●	Fire detection and alarm system.	Install adequate fire detection and alarm system.		60
													Marking or posting of emergency exits and/or escape routes in the workplace.	Mark or post all emergency exits and/or escape routes in the workplace.		
													Fire fighting equipment	Ensure that all firefighting equipment's are maintained properly.		
													Training workers to use the firefighting equipment.	Provide firefighting training to at least 10% of workers.		
													Periodic Emergency drills	Ensure that the factory realizes periodic emergency drills.		

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Occupational Safety and Health	Health Services and First Aid												Onsite medical facilities and staff.	Provide onsite medical facilities and staff as required by the law.		60
													Health checks for workers who are exposed to work-related hazards.	Provide health checks for workers who are exposed to work-related hazards.		
													First aid training for workers.	Provide first aid training to at least 10% of the workers.	The factory provided pre-assignment and/or annual medical checks to workers.	
	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.		30
												Mechanisms to ensure cooperation between workers and management on OSH matters.	Ensure that the factory has a functioning OSH committee.			
	Welfare Facilities												Toilets.	Increase the number of toilets as required by law.		60
	Worker Accommodation															
Working Environment												Workplace lighting.	Improve lighting in the workplace.		24	
Worker Protection												Installing, grounding, and/or maintaining electrical wires, switches, and/or plugs.	Install, ground, and/or maintain electrical wires, switches, and/or plugs.		60	
												Installing guards on all dangerous moving parts of machines and equipment.	Install guards on all dangerous moving parts of machines and equipment.			
												Providing workers with personal protective clothing and equipment.	Provide workers with personal protective clothing and equipment.			
Leave																

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Working Time	Overtime	●	●	●	●	●	●	●	●	●	●	●	Limits on overtime hours worked	Comply with the limit of overtime hours worked set by the law.		60
													Authorization from the Department of Labor for overtime.	Request authorization from the Department of Labor to work overtime.		
	Regular Hours	●	●	●	●	●	●	●	●	○	●	●	Working time records	Keep accurate working time records for all hours worked.	The factory complies with the legal requirements on the daily break period.	6

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

8th assessment	9th assessment	10th assessment	11th assessment
39%	36%	36%	n/a

S & H Global S.A.

Location: Port-au-Prince
Number of workers: 7017
Date of registration: 19-Jun-12
Date of last BW assessment: 27-Jul-15

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

Advisory and Training Services

Date	Activity
7-Jun-15	Supervisory skill Training
13-Aug-15	Introduction to the self diagnosis tool with compliance team. Discussion with unions.
30-Sep-15	PICC training
29-Sep-15	PICC preparation and awareness for new members as the old members resigned
30-Sep-15	PICC Training
21-Nov-15	Supervisory skill Training
22-Nov-15	Supervisors' Networking Event
23-Nov-15	Workers' Rights & Responsibilities
26-Nov-15	Negotiation Skills training
27-Nov-15	Workplace Communication
29-Nov-15	Presentation Of the Synthesis Report to Union and Middle Management
28-Nov-15	Advisory on management systems
3-Dec-15	PICC meeting
2-Feb-16	Meeting with the compliance team regarding the grievance training to be held the following day
3-Feb-16	Grievance training for PICC and union representatives
23-Mar-16	Industry seminar on risk management

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	○	○	○	○	○	○				

[illegible]

Compliance cluster	Compliance point	Assessment						Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6				
Contracts and Human Resources	Social Security and Other Benefits	●	○	○	○	○	●	Employer contribution to OFATMA for maternity and health insurance.	Ensure that the factory is affiliated with the health and maternity insurance from OFATMA.		
								Forwarding of workers' contributions to OFATMA.	Ensure that the factory is affiliated with the health and maternity insurance from OFATMA.		
	Wage Information, Use and Deduction	○	○	○	●	○	○				
	Contracting Procedures	○	○	○	○	○	○				
	Dialogue, Discipline and Disputes							Bullying, harassment or humiliating treatment of workers.	Ensure that workers are not subject to bullying, harassment or humiliating treatments.	Several trainings were organized to spread awareness at both worker and management level. In addition posters were posted in all buildings to highlight how to report this type of abuse.	
		●	○	○	●	○	●				
	Employment Contracts	○	○	○	○	○	●				
	Termination							Notice of termination.	Provide or pay the proper notice of termination to workers.		
								Payment for unused paid annual leave upon resignation or termination.	Ensure that workers are paid correctly for any unused annual leave upon termination or resignation.	A system was put in place to ensure that all earnings are considered in the calculation of annual leave for all buildings.	
		●	○	○	○	○	●	Annual salary supplement or bonus upon termination.	Ensure that annual salary supplement or bonus is paid correctly upon termination.	A system was put in place to ensure compliance for this point. All earnings are considered in the calculation of bonus for all buildings.	

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

Compliance cluster	Compliance point	Assessment						Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6				
	Working Environment							Workplace noise levels.	Ensure that noise levels are acceptable.	Ear plugs are provided to all departments where the noise level is higher than the other areas	18
								Workplace temperature and/or ventilation.	Ensure that workplace temperature is acceptable.	Several non-functioning exhaust fans were repaired to improve workplace temperature and ventilation.	
	Worker Protection										
	Leave										
Working Time	Overtime							Limits on overtime hours worked.	Limit overtime work to 80 hours in 3 months.	Overtime hours are limited to a maximum of 80 hours per trimester. The compliance team strictly monitors to not exceed the legal limit for overtime working hours.	
								Authorization from the Department of Labour for overtime.	Request authorization from MAST for overtime work.	Advance authorization is requested from MAST.	
	Regular Hours										

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

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

Sewing International S.A.

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

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

Advisory and Training Services in the past 6 months

Date	Activity
22-Jan-16	Meeting with the HR Manager and the compliance manager to introduce the new progress report template and discuss the next steps of the implementation of the PICC. Meeting with the general manager to present the template FOA policy suggested by Better Work and ongoing IR issues.
25-Feb-16	Advisory meeting with HR manager to follow up on the improvement plan and plan implementation of the PICC. Meeting with the unions GOSTTRA and SOTA regarding their participation in the PICC. Meeting with the compliance manager to discuss the training plan.
23-Mar-16	Participation in industry seminar on risk management

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months	
		1	2	3	4	5	6	7	8	9	10	11					
Child Labour	Child Labourers																
	Documentation and Protection of Young Workers																
	Hazardous Work																
	Unconditional Worst Forms																
Discrimination	Gender																
	Race and Origin																
	Religion and Political Opinion																
Forced Labour	Bonded Labour																
	Coercion																
	Forced Labour and Overtime																
	Prison Labour																
Freedom of Association and Collective Bargaining	Collective Bargaining																
	Interference and Discrimination																
	Strikes																
	Union Operations																
	Method of Payment																
	Minimum Wage																
	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	11				
Compensation													Employer contribution to ONA.	Forward employer's contribution to ONA.	ONA payment was done until Januray 2016.	
													Collecting and forwarding workers' contributions for social insurance funds to ONA.	Collect and forward workers' contribution for social insurance funds to ONA.	Workers' contribution for social insurance funds to ONA was collected and forwarded until January 2016.	
	Social Security and Other Benefits	●	●	○	●	○	●	●	○	○	○	○	Employer contribution to OFATMA for maternity and health insurance.	Enroll to OFATMA maternity and Health Insurance and forward employer's contribution to OFATMA.		
													Forwarding of workers' contributions to OFATMA.	Collect and forward workers' contribution to OFATMA.		
Contracts and Human Resources	Wage Information, Use and Deduction	●	●	○	●	○	○	●	●	○	○	○				
	Contracting Procedures	○	○	○	○	○	○	○	○	○	○	○				
	Dialogue, Discipline and Disputes	○	○	○	○	○	●	○	○	○	○	○				
	Employment Contracts	●	●	○	●	●	○	○	○	○	○	○				
	Termination	○	○	○	●	○	○	○	○	○	○	○				
Occupational Safety and Health	Chemicals and Hazardous Substances	●	●	○	●	○	○	○	○	○	○	○				
	Emergency Preparedness	●	●	○	●	○	○	○	○	○	○	○	Accessible, unobstructed, and/or unlocked emergency exits during working hours, including overtime.	Ensure that all escape routes are clear during working hours.		60
	Health Services and First Aid	●	●	●	●	●	○	○	○	○	○	○	Onsite medical facilities and staff. Pre-assignment and/or annual medical checks for workers.	Provide onsite medical facilities and staff as required by law. Provide pre-assignment and/or annual medical checks for workers.	The factory provides pre-assignment and/or annual medical checks for workers.	60
	OSH Management Systems	●	○	○	○	○	○	○	○	○	○	○	Toilets.	Increase the number of toilets as required by law.		60
	Worker Accommodation	○	○	○	○	○	○	○	○	○	○	○				

Compliance cluster	Compliance point	Assessment											Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10	11				
Working Environment	Working Environment												Workplace temperature.	Reduce workplace temperature.		24
													Workplace lighting.	Increase workplace lighting.		
	Worker Protection												Providing workers with personal protective clothing and equipment.	Ensure that all relevant workers have adequate personal protective clothing and equipment.	The workers received adequate PPEs.	60
													Chairs with backrests.	Provide chairs with backrests for all workers.	The factory replaced 90% of the chairs without backrest.	
Working Time	Working Time												Installing guards on all dangerous moving parts of machines and equipment.	Install guards on all dangerous moving parts of machines and equipment.	The factory trained and encouraged workers to use personal protective equipment provided.	

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

8th assessment	9th assessment	10th assessment	11th assessment
54%	45%	45%	60%

Val d'Or Apparel Mfg S.A.

Location: Port-au-Prince
Number of workers: 1486
Date of last BW assessment: 11-Nov-15

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

Advisory and Training Services in the past 6 months

Date	Activity
23-Sep-16	PICC Meeting to discuss the following points: excessive overtime, payment of ordinary and night overtime, payment of weekly rest day, forced labor.
24-Oct-16	PICC Meeting to discuss the following points: understanding of payroll; supervisors attitude; termination procedures; maternity leave payment.
9-Feb-15	Advisory on accuracy of payroll records. Advisory on implementation of a salary deduction for canteen services.
29-Jan-16	PICC Meeting and meeting with management to discuss management systems requirements, improvement plan and training plans. PICC meeting to discuss status of the PICC and improvement needs.
26-Feb-16	Management introduction meeting with the new general manager. Introduction meeting with the newly formed staff union.
1-Mar-16	Meeting with management, union representative, labor ombudsperson, MAST representatives to discuss the relationship between management and the newly formed union. Meeting with the cafeteria manager and PICC members to discuss the issues related to the eating area. Tour of the eating area.
24-Mar-16	Participation in industry seminar on risk management.

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	○	○				
	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				
Compensation	Overtime Wages			Payment for overtime worked at night.	Ensure that payment for overtime worked at night is accurate.	The factor revised the internal procedure for the payment of overtime worked at night.	
						The factory revised the internal procedure for the payment of annual leave. The annual leave is now correctly paid to all eligible workers.	6
	Paid Leave			Payment for sick leave.	Ensure that payment for sick leave is accurate.	The employer agreed to pay maternity leave from non public institutions.	
				Payment for maternity leave.	Ensure that payment for maternity leave is accurate.	The employer agreed to pay sick leave from non public institutions.	
				Payment for weekly rest days.	Payment for weekly rest days.		
	Premium Pay						
				Employer contribution to OFATMA for work-related accident insurance.	Pay employer contribution to OFATMA for work-related accident insurance.	The employer made a first payment to OFATMA for work related accident insurance.	6
	Social Security and Other Benefits			Employer contribution to OFATMA for maternity and health insurance.	Pay employer contribution to OFATMA for maternity and health insurance.		
				Forwarding of workers' contributions to OFATMA.	Forward of workers' contributions to OFATMA.		
	Wage Information, Use and Deduction					All payments made to workers are now recorded in the payroll.	
	Contracting Procedures						

Compliance cluster	Compliance point	Assessment		Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2				
Contracts and Human Resources	Dialogue, Discipline and Disputes			Disciplinary measures.	Ensure that disciplinary measures comply with legal requirements.	The factory reviewed its internal work rules and sent it to MAST for approval.	
	Employment Contracts			Internal work rules.	Ensure that internal work rules comply with legal requirements.	The factory reviewed its internal work rules and sent it to MAST for approval.	
	Termination						
Chemicals and Hazardous Substances				Labeling of chemicals and hazardous substances.	Label all chemicals and hazardous substances used in the workplace.		
				Storage of chemicals and hazardous substances.	Ensure that storage of chemicals and hazardous substances is adequate.	The storage area for chemicals and hazardous substances was reorganized.	
				Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	Provide chemical safety data sheets for all chemicals and hazardous substances in the workplace.	The factory posted some missing MSDS.	
				Training workers who work with chemicals and hazardous substances.	Train workers who work with chemicals and hazardous substances.		
				Washing facilities or cleansing materials in the event of chemical exposure.	Provide washing facilities or cleansing materials in the event of chemical exposure.		

Compliance cluster	Compliance point	Assessment		Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2				
Occupational Safety and Health	Emergency Preparedness	●	◐	Marking or posting of emergency exits and/or escape routes in the workplace.		The factory installed additional emergency lights.	6
						10% of the workers were trained in firefighting.	
						Adequate fire-fighting equipments are available and functioning.	
	Health Services and First Aid	●	●	Onsite medical facilities and staff.	Comply with the number of medical staff required by the law.		6
				Health checks for workers who are exposed to work-related hazards.	Provide health checks for workers who are exposed to work-related hazards.		
				Annual medical checks for workers.	Provide annual medical checks for workers.		
	OSH Management Systems	○	◐	Recording work-related accidents and diseases and/or submitting the record to OFATMA.	Record work-related accidents and diseases and/or submitting the record to OFATMA.	The factory record work-related accidents and diseases and submit the record to OFATMA.	
	Welfare Facilities	○	◐	Toilets.			
				Eating area.		The cafeteria has been extended in order to accommodate about 750-800 workers.	
	Worker Accommodation	○	○				
	Working Environment	●	●	Workplace lighting	Increase the lighting in the workplace.		6

Compliance cluster	Compliance point	Assessment		Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2				
Working Time	Worker Protection	☐	☒	Providing workers with personal protective clothing and equipment.	Provide workers with personal protective clothing and equipment.	The factory provided additional personal protective clothing and equipment.	
				Ergonomic requirements	Comply with all ergonomic requirements		
	Leave	☐	☒	Time off for breastfeeding breaks.	Provide time off for breastfeeding breaks.	The factory developed a policy for breastfeeding breaks.	
				Limits on overtime hours worked.	Comply with legal limits on overtime hours worked.		
	Overtime	☐	☒	Voluntary overtime.	Ensure that overtime work is voluntary.		
				Authorization from the Department of Labour for overtime.	Obtain authorization from the Department of Labour for overtime.	The factory requested authorization from the Department of Labour for overtime.	
	Regular Hours	☐	☐				

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

1st assessment	2nd assessment
0%	0%

The Willbes Haitian II S.A.

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

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

Advisory and Training Services in the past 6 months

Date	Activity
24-Sep-15	Meeting with compliance manager to discuss compensation issues and remediation plan. Planning of new date for PICC training for workers.
23-Oct-15	Assistance to compliance manager in producing progress report.
28-Oct-15	Negotiation Skills training
17-Nov-15	Meeting with compliance manager to assist with completion of the factory's Progress Report.
2-Feb-16	Meeting with compliance manager to discuss issues on social security and wages payment. Also discussed the introduction of the paid BWH service package. Factory tour done with compliance team
23-Mar-16	Participation in industry seminar on risk management.

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	○	○	○	○	○	○	○	○	○	○				
	Other Grounds	○	○	○	○	○	○	○	○	○	○				
	Race and Origin	○	○	○	○	○	○	○	○	○	○				
	Religion and Political Opinion	○	○	○	○	○	○	○	○	○	○				
Forced Labour	Bonded Labour	○	○	○	○	○	○	○	○	○	○				
	Coercion	●	○	○	○	○	○	○	○	○	○				
	Forced Labour and Overtime	○	○	○	○	○	○	○	○	○	○				
	Prison Labour	○	○	○	○	○	○	○	○	○	○				
Freedom of Association and Collective Bargaining	Collective Bargaining	○	○	○	○	○	○	○	○	○	○				
	Interference and Discrimination	○	○	○	○	○	○	○	○	○	○				
	Strikes	○	○	○	○	○	○	○	○	○	○				
	Union Operations	○	○	○	○	○	○	○	○	○	○				
	Method of Payment	○	○	○	○	○	○	○	○	○	○				
	Minimum Wages	○	○	○	○	○	○	○	○	○	○				
	Overtime Wages	○	○	○	○	○	○	○	○	●	○			The factory has taken actions to remediate issues with payment of night shift overtime.	

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
	Paid Leave											Payment for annual leave.		The factory is implementing a revision to its compensation system to base calculations for all leave pay on average salary.	
												Payment for sick leave.		The factory is implementing a revision to its compensation system to base calculations for all leave pay on average salary.	
												Payment for maternity leave.		The factory is implementing a revision to its compensation system to base calculations for all leave pay on average salary.	
Compensation	Premium Pay											Payment for regular working hours worked on weekly rest days.	Workers working on weekly rest days must be paid at least 250% above normal wage.	The factory is implementing a revision to the compensation system to make necessary adjustments.	6
														The factory has taken action to remediate the issues regarding pay for work completed on holidays.	

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
	Social Security and Other Benefits											Employer contribution to OFATMA for maternity and health insurance.	The factory must register all workers to OFATMA for maternity and health insurance.		6
												Forwarding of workers' contributions to OFATMA.	The factory must collect and forward workers contribution to OFATMA for maternity and health insurance.		
												Payment of annual salary supplement or bonus.	Payment of annual salary bonus must be paid based on total annual earnings.		
														Employer contribution to ONA was done properly.	
														Annual salary bonus was paid based on total annual earnings.	
Contracts and Human Resources														Worker's contribution to ONA was done properly.	
	Wage Information, Use and Deduction											Payroll records.	The employer must keep only one payroll and it should be complete.		6
	Contracting Procedures														
	Dialogue, Discipline and Disputes														
	Employment Contracts											Internal work rules.	The internal work rules must be revised and submitted to MAST for approval.		
	Termination											Notice of termination.	Compensation for notice of termination must include all salary perceived by workers for the year.	The factory is implementing a revision to the compensation system to make necessary adjustments.	

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
Chemicals and Hazardous Substances												Labelling of chemicals and hazardous substances.	All containers of chemicals must be properly labelled.		12
												Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	The factory must have a register of MSDSs for all chemicals and hazardous substances in use.		
												Washing facilities or cleansing materials in the event of chemical exposure.	The factory must install appropriate washing facilities in areas where chemicals is handled.	The factory has installed an eye wash station in the chemical storage area.	
Emergency Preparedness														The factory has provided the appropriate training to workers who work with chemicals and hazardous substances.	
												Firefighting equipment.	Ensure all firefighting equipment are accessible and ready to use.		54
												Accessible, unobstructed, and/or unlocked emergency exits during working hours, including overtime.	Ensure all emergency exit and escape routes remain unobstructed during working hours.		
												Safeguarding possible sources of ignition	Ensure all electrical devices and switch boxes are safely guarded and isolated.		

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											Medical checks for workers upon hiring.	Provide pre-assignment medical checks for new workers within first 3 months of assignment.		54
												Health checks for workers who are exposed to work-related hazards.	Ensure all workers who are exposed to work related hazard get free medical checks at least twice a year.		
												Onsite medical facilities and staff.	The factory must have an appropriate number of medical staff onsite proportionally to the workforce.		
												First aid boxes/supplies in the workplace.	Install adequate first aid boxes in the workplace in case of emergencies.		
												Annual medical checks for workers.	Provide annual medical checks for all workers.		
	OSH Management Systems														
	Welfare Facilities											Toilets.	Provide the number of toilets required by the Haitian Labour code.	The factory is rebuilding the facilities to improve the conditions and number of toilets.	54
												Eating area.	Provide an adequate eating area to accommodate the workers.	The factory is building two new eating areas to accomodate more workers	
	Worker Accommodation														
	Working Environment											Workplace temperature.	Reduce the temperature in the workplace.	A new water sparkling system has been installed to help reduce the temperature levels.	12
												Workplace temperature and/or ventilation.	Provide adequate ventilation 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				
Worker Protection												Providing workers with personal protective clothing and equipment.	Provide workers in spot cleaning sections with appropriate masks to protect against chemicals vapors.	Workers in spot cleaning have been provided the appropriate PPEs.	54
	Worker Protection	●	●	●	●	●	●	●	●	●	●			The factory has installed additional protection guards on dangerous moving parts of machines and equipment.	
Working Time	Leave	○	○	●	○	●	●	●	○	●	●	Time off for breastfeeding breaks.	Provide paid breastfeeding breaks to workers who are entitled to this benefit.		6
	Overtime	●	○	○	○	○	○	○	○	●	○			No workers were found to have worked beyond the legal limit of overtime.	
												Working time records.	Record all working time in the attendance system to ensure time records reflect actual working time.		6
	Regular Hours	●	●	●	○	○	○	○	○	○	○				

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

6th assessment	7th assessment	8th assessment	9th assessment	10th assessment
27%	14%	36%	58%	59%

The Willbes Haitian III S.A.

Location: Port-au-Prince

Number of workers: 653

Date of last BW assessment: 14-Jul-15

● Factory was found non-compliant.

● Factory was progressing

☐ Factory was compliant.

Advisory and Training Services in the past 6 months

Date	Activity
24-Sep-15	Meeting with compliance manager to discuss compensation issues and remediation plan.
23-Oct-15	Assistance to compliance manager in producing progress report.
17-Nov-15	Meeting with compliance manager to assist with completion of the factory's Progress Report.
2-Feb-16	Meeting with compliance manager to discuss issues on Social Security and wages payment. Also discussed the introduction of the paid BWH service package. Factory tour done with compliance team
23-Mar-16	Participation in industry seminar on risk management.

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																
	Other Grounds																
	Race and Origin																
	Religion and Political Opinion																
Forced Labour	Bonded Labour																
	Coercion																
	Forced Labour and Overtime																
	Prison Labour																
Freedom of Association and Collective Bargaining	Collective Bargaining																
	Interference and Discrimination																
	Strikes																
	Union Operations																
Minimum Wages and Overtime	Method of Payment																
	Minimum Wages																
	Overtime Wages																

Compliance cluster	Compliance point	Assessment	Details of non-compliance	Improvement Priorities	Remediation Efforts	Months					
		12345678910									
Compensation	Paid Leave		Payment for annual leave.	Payment for annual leave must include all salaries perceived by the workers during the year.	The factory is implementing a revision to its compensation system to base calculations for all leave pay on average salary.						
			Payment for sick leave.	Payment for sick leave must be based on average daily salary.	The factory is implementing a revision to its compensation system to base calculations for all leave pay on average salary.						
			Payment for maternity leave.	Payment for maternity leave must be based on average daily salary.	The factory is implementing a revision to its compensation system to base calculations for all leave pay on average salary.						
	Premium Pay										
	Social Security and Other Benefits		Employer contribution to OFATMA for maternity and health insurance.	The factory must register all workers to OFATMA for maternity and health insurance.							
			Forwarding of workers' contributions to OFATMA.	The factory must collect and forward workers contribution to OFATMA for maternity and health insurance.							
			Payment of annual salary supplement or bonus.	Payment of annual salary bonus must be paid based on total annual earnings.	The factory is implementing a revision to the compensation system to make necessary adjustments.						
	Wage Information, Use and Deduction										
	Contracting Procedures										
	Dialogue, Discipline and Disputes		Disciplinary measures.	Ensure all disciplinary measures are approved by MAST by also appearing in internal work regulations of 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	Employment Contracts	●	◐	●	○	○	○	○	○	○	●	Internal work rules.	The internal work rules must be revised and submitted to MAST for approval.		
	Termination	●	○	●	○	○	○	●	◐	◐	●	Notice of termination.	Compensation for notice of termination must include all salary perceived by workers for the year.	The factory is implementing a revision to the compensation system to make necessary adjustments.	18
Chemicals and Hazardous Substances												Labelling of chemicals and hazardous substances.	All containers of chemicals must be properly labelled.		
												Storage of chemicals and hazardous substances.	Provide an adequate storage facility for chemicals and hazardous substances.	The factory has built a new facility for chemicals and hazardous material storage.	
		●	◐	●	◐	◐	◐	◐	◐	○	●	Chemical safety data sheets for all chemicals and hazardous substances in the workplace.	The factory must have a register of MSDSs for all chemicals and hazardous substances in use.	The factory has a register of all chemicals in use.	
												Washing facilities or cleansing materials in the event of chemical exposure.	The factory must install appropriate washing facilities in areas where chemicals is handled.	The factory has installed a new washing in the chemical storage area.	
Emergency Preparedness												Accessible, unobstructed, and/or unlocked emergency exits during working hours, including overtime.	Ensure all emergency exit and escape routes remain unobstructed during working hours.		24
		●	◐	●	◐	○	◐	◐	◐	●	◐			The factory Installed adequate fire detection and alarm system in building 35.	
														The factory has taken measures to reduce fire hazards by removing materials stored near electrical switches.	

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												Annual medical checks for workers.	Provide annual medical checks for all workers.		54
	Health Services and First Aid	●	◐	●	◐	◐	◐	●	◐	◐	◐			The factory arranges medical checks for workers upon hiring.	
	OSH Management Systems	●	◐	●	◐	◐	◐	◐	◐	◐	◐				
												Toilets.	Provide the number of toilets required by the Haitian Labour code.	The factory is rebuilding the facilities to improve the conditions and number of toilets.	54
												Eating area.	Provide an adequate eating area to accommodate the workers.	The factory is building two new eating areas to accomodate more workers	
	Welfare Facilities	●	●	◐	◐	●	●	●	◐	◐	◐			The factory is taking the appropriate measures to ensure soap and paper is available at all time during working hours.	
	Worker Accommodation	◐	◐	◐	◐	◐	◐	◐	◐	◐	◐				
	Working Environment	◐	◐	◐	●	●	●	●	●	◐	●	Workplace temperature and/or ventilation.	Provide adequate ventilation in the workplace to reduce the temperatures.		
														Standing workers were provided with fatigue mats or have tables equipped with foot rest.	
	Worker Protection	●	◐	●	◐	◐	◐	◐	◐	●	◐			The factory installed additional guards on dangerous moving parts of machines and equipment.	
Working Time												Time off for breastfeeding breaks.	Provide paid breastfeeding breaks to workers who are entitled to the benefit without constraint in the allowed period.	Management is monitoring the issue by keeping a register of workers entilted to the benefit to ensure they receive it.	
	Leave	◐	◐	●	●	◐	●	●	◐	◐	●				
	Overtime	●	◐	●	●	◐	●	◐	●	◐	◐				

Compliance cluster	Compliance point	Assessment										Details of non-compliance	Improvement Priorities	Remediation Efforts	Months
		1	2	3	4	5	6	7	8	9	10				
	Regular Hours	●	○	●	○	○	○	○	○	○	○	Daily break periods.	Ensure all workers have at least one full hour of break during the day.		

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

6th assessment	7th assessment	8th assessment	9th assessment	10th assessment
27%	30%	28%	43%	25%

Annex 1. HOPE II Legislation Reporting Requirements

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

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

(i) The name of each producer listed in the registry described in paragraph (2)(B)(i) that has been identified as having met the conditions under subparagraph (B).

(ii) The name of each producer listed in the registry described in paragraph (2)(B)(i) that has been identified as having deficiencies with respect to the conditions under subparagraph (B), and has failed to remedy such deficiencies.

(iii) For each producer listed under clause (ii) —

(I) a description of the deficiencies found to exist and the specific suggestions for remediating such deficiencies made by the entity operating the TAICNAR Program;

(II) a description of the efforts by the producer to remediate the deficiencies, including a description of assistance provided by any entity to assist in such remediation; and

(III) with respect to deficiencies that have not been remediated, the amount of time that has elapsed since the deficiencies were first identified in a report under this subparagraph.

(iv) For each producer identified as having deficiencies with respect to the conditions described under subparagraph (B) in a prior report under this subparagraph, a description of the progress made in remediating such deficiencies since the submission of the prior report, and an assessment of whether any aspect of such deficiencies persists. [...]