QUARTERLY AGGREGATE REPORT

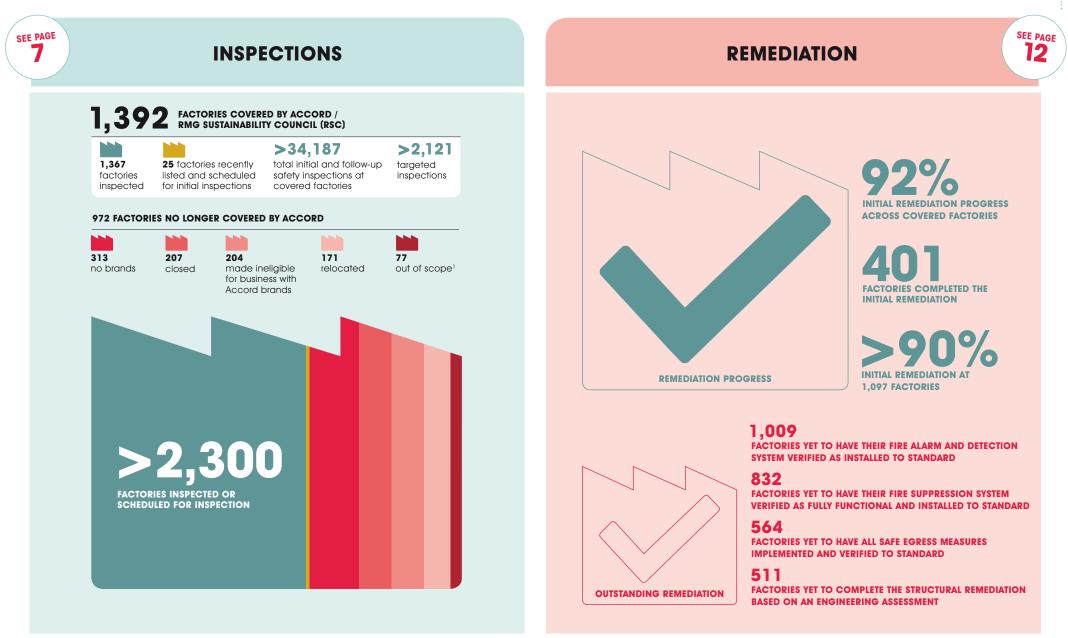
on remediation progress and status of workplace programmes at RMG factories covered by the International Accord for Health and Safety in the Textile and Garment Industry / RMG Sustainability Council Bangladesh

Statistics as of 17 March 2022

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KEY MILESTONES Inspection & Remediation Programs



1. Out of Scope means factories were listed by Accord Signatories and initially inspected by the Accord/RSC but are not producing garments/textiles.

KEY MILESTONES Workplace Programs



ACCORD REPORTING AND TRANSPARENCY

As part of its commitment to transparency and accountability², the Accord publishes Quarterly Aggregate Reports and makes public on its website the following information:

- The list of RMG and textile factories³ producing for Accord company signatories and their safety remediation progress, together with the status of the safety training programme.
- The list of ineligible suppliers, for business with Accord signatory companies⁴, for failure to implement workplace safety measures.
- The list of factories handed over to the Government of Bangladesh.
- The complaints raised by workers and their representatives through the Accord Signatories' health & safety complaints mechanism.

The International Accord, which entered into effect on 1st September 2021, covered as of 17 March 2022 1,392 factories in Bangladesh of which:

- 1,360 factories are 'active', meaning that at least one company signatory is actively sourcing from there.
- 14 factories are 'inactive responsible', meaning that company signatories stopped sourcing from there since 1st September 2021.
- **18** factories are 'pending closure', meaning that they are undergoing the closure procedure. This procedure is initiated when a factory has / is going to be temporarily closed, permanently closed, or relocated.

The data showcased in this Aggregate Report is as of 17th March 2022 and, where data was available, shows data for each quarter since the last Aggregate Report published in May 2021.

INTERNATIONAL ACCORD KEY FEATURES:

- Legally-binding agreement between brands & trade unions
- Independent safety inspections & remediation programme implemented by RMG Sustainability Council in Bangladesh
- Safety Committee, Safety Training & Complaints Mechanism implemented by RMG Sustainability Council in Bangladesh
- Commitment to establish workplace safety programmes in at least one other country
- Brand commitment to ensure safety remediation is completed & financially feasible
- Disclosure of inspection reports & corrective action plans
- Protection of right to refuse unsafe work
- Ongoing promotion of right to Freedom of Association to advance safety
- Optional listing of home textiles and fabric & knit accessory suppliers

More information: www.internationalaccord.org

^{2.} International Accord Article 28.

^{3.} Under the International Accord, signatory companies can voluntarily list their suppliers in any of the following categories: i) home textiles; ii) fabric and knit accessories. If a signatory so chooses, it must list all its suppliers in the respective category.

^{4.} www.bangladeshaccord.org/factories. Apply filter 'Remediation status: ineligible'.

ESTABLISHMENT OF 2021 INTERNATIONAL ACCORD & CONTINUED COORDINATION WITH RMG SUSTAINABILITY COUNCIL (RSC) IN BANGLADESH

The 2021 International Accord

The International Accord on Health & Safety in the Textile & Garment Industry is a successor agreement to the 2013 and 2018 Accords on Fire and Building Safety in Bangladesh and came into effect on 1st September 2021. By establishing the International Accord, signatories showed their commitment to continuing the workplace safety programmes at factories in Bangladesh as well as expanding workplace safety programmes to other countries, based on feasibility studies. The International Accord also provides that signatories will explore the expansion of scope to address human rights due diligence beyond health and safety. The 2021 International Accord agreement runs until end of October 2023, by which time the signatories aim to have established a safety programme in at least one other country.

Criteria for expansion of Accord programmes

The Accord signatories have agreed on the following criteria to determine where and when to establish programmes in other countries:

- Presence and volume of signatory brands in the country
- Interest of brands
- Extent to which existing mechanisms are able to regulate safety
- Risk of safety issues in the textile and garment industry
- Views of stakeholders in the country

Feasibility studies

Since September 2021, the Accord Secretariat began feasibility studies with signatories and stakeholders to explore the needs and opportunities for safety-related inspection, remediation, and workplace safety programmes in major textile and garment exporting countries beyond Bangladesh. From November 2021 to February 2022 the Secretariat conducted surveys of company signatories, desk research of industry data, and interviews with key stakeholders in the countries identified as potential priorities for expansion. In February 2022 the Accord Steering Committee decided to conduct indepth feasibility studies in four countries: Sri Lanka, Pakistan, Morocco and India. In March 2022, the Secretariat visited Sri Lanka and Pakistan to meet stakeholders for discussions on the feasibility and desirability of establishing safety programmes aligned with the principles of the Bangladesh Accord in these garment and textile industries.

The RMG Sustainability Council (RSC) in Bangladesh

Since June 2020, the inspections, remediation and worker participation programmes of the Accord are implemented by the RMG Sustainability Council (RSC) in Bangladesh, which is an independent organisation jointly governed by brands, trade unions and manufacturers. The RSC inherited all operations, staff, infrastructure, and functions of the Accord Office in Bangladesh.

The Accord signatory companies' requirements related to workplace safety are applied and monitored in their RMG factories by the RSC, based on the standards and procedures developed under the preceding Accord agreements for inspections, remediation, Safety Committee and Safety Training programme and operation of the Safety & Health Complaints Mechanism.

Through their support and participation in the RSC, the Accord signatories are committed to fulfilling their legally binding obligations of the International Accord agreement to ensure safe workplaces.

Accord Reporting

Since June 2020, the Accord signatories' obligations with respect to inspections, remediation and workplace programmes at their supplier factories have been implemented through the RSC. To ensure that the signatories' obligations are upheld, the Accord Foundation's Secretariat monitors, verifies and reports on the implementation of the International Accord obligations.

RSC engineers, remediation case handlers, trainers and complaints case handlers are responsible for implementing the safety programmes, in accordance with the protocols and procedures developed by the previous Accord.

The Accord reports on safety progress achieved by the Accord-covered factories based on the data in the Fair Factories Clearinghouse (FFC) database as well as data provided directly by the RSC to the Accord Foundation in the Netherlands.

IMPACT OF THE COVID-19 PANDEMIC ON THE INSPECTION AND WORKPLACE PROGRAMS

Safety Inspections

In line with Covid-19 rules, the Accord and RSC suspended on-site safety inspections in the following periods: March to September 2020; April to May 2021. To prevent the spread of the Covid-19 virus among its staff and at the inspected factories, the RSC implemented several changes to the usual inspection procedures, including direct transport of the engineers to and from the factories, and the provision of personal protective equipment (PPE).

Furthermore, inspections were only scheduled at factories which provided documentary and pictorial evidence that adequate safety measures to contain the spread of the Covid-19 virus are in place and maintained at the factory.

Following an Accord Steering Committee decision in April 2020, the Accord Secretariat requested all Lead Brands⁵ to provide their assigned factories with guidelines and examples based on the opinions and recommendations of global and Bangladeshi public health, OSH, and disease prevention experts. Included in this communication are accepted measures to keep workers safe and prevent further spread of the virus. Factories were asked to provide their Lead Brands with video or pictorial evidence, and to communicate the date of completing each measure.

Recommended measures include but are not limited to:

- Providing protective nose and mouth face masks
- Disinfection of hands and shoes at entry
- Introduction of measures to maintain social distancing
- Establishing and maintaining natural airflow / ventilation
- Conveying important information on spread prevention throughout the factory.

Workplace programs

From March 2020 to the end of 2021, the workplace programmes were implemented remotely to reduce the risk of spreading Covid-19. The Safety Committee trainings and Safety Committee meetings were conducted via teleconference, and the trainers distributed to factories informational materials on Covid-19 prepared by the World Health Organisation and the Government of Bangladesh. On-site Safety Committee Training sessions were resumed by RSC trainers in December 2021. Covid-19 measures are maintained during training sessions, including social distancing, wearing of masks, and non-attendance in case of symptoms. Covid-19 measures are included in the Safety Committee training sessions.

Since March 2020, All Employee Meetings (AEMs) to inform all workers in a factory about health and safety were suspended due to the pandemic. In January 2022, the RSC conducted a pilot in 5 factories to resume on-site AEMs in an adapted format, whereby the presentations are made in the work areas of the factory with workers remaining at their work stations rather than separately congregating in one location. In February 2022 on-site AEMs were put on hold due to a rise in Covid-19 cases and then resumed again in March 2022 following the adapted format.

Workers at covered factories have filed through the Accord signatories' Complaints Mechanism, approximately 302 complaints related to Covid-19.

These complaints largely fall into the following categories:

- Non-payment of severance entitlements
- Retrenchment / forced resignation / termination of workers
- Non-payment/under-payment of wages
- Lack of adequate protective measures in the factories to prevent the spread of Covid-19 (particularly during the first months of the crisis)
- Non-payment of maternity benefits and forced resignation/termination of pregnant workers.

All complaints related to the Covid-19 health crisis are investigated and the outcome of the complaints is published on the RSC and Accord websites.

If a complaint alleges a critical or life-threatening safety hazard, an emergency inspection will be arranged.

5. For every factory, the Accord assigns a lead brand to liaise with the factory on behalf of all the Accord companies responsible for remediation in that factory. This approach has allowed each company to focus their time and efforts on driving remediation in a subset of their factories.



Under the terms of the Accord, company signatories disclose all their RMG supplier factories and, on a voluntarily basis, their home textiles and fabric & knit accessory suppliers in Bangladesh. All factories listed by Accord signatory companies receive initial inspections by the RSC, with periodic follow-up inspections to monitor and verify remedial measures.

Since June 2020, all safety inspections conducted by the RSC follow Covid-19 precautionary measures implemented specifically for the inspection process (see section 'Impact of the Covid-19 pandemic on the inspections and workplace programmes').

Initial inspections at covered factories

TABLE 1 – Factories supplying to Accord signatories, inspected or scheduled for inspection

FACTORIES	
Covered factories	
Inspected	1,367
Recently listed and yet to be scheduled for initial inspections	25
Total covered factories	1,392
Factories no longer covered	
Closed	207
Relocated	171
Made ineligible for business with Accord company signatories	204
No Brand ⁶	313
Out of the Accord's scope	77
Total factories no longer covered	972
Total factories inspected or scheduled for initial inspections	2,364

After each factory has been inspected for fire, electrical and structural safety, the inspection reports are shared with factory owners, the related Accord signatory companies, and worker representatives.

The factory owner and the company signatories are tasked to develop a Corrective Action Plan (CAP) that details what remedial actions will be taken with a clear timeline and a financial plan. The RSC team of case handlers provide support in the CAP development and work closely with the RSC engineers to provide any necessary technical guidance.

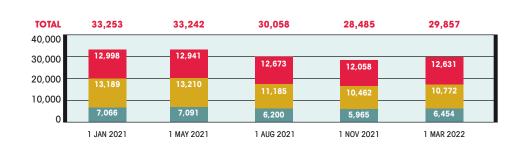
Once a CAP is finalised by the factory owners and the signatory companies, it is submitted for review and approval by the RSC Chief Safety Officer.

After approval, all three inspection reports and the CAP are uploaded to the database jointly shared by the Accord and the RSC and are made publicly available on both the Accord and RSC websites⁷.

^{6. &#}x27;No brand' means the company signatory or signatories which originally disclosed this factory have been released from responsibility to ensure that factory participates in the safety programmes under the terms of the Accord (article 34).

^{7.} Available here: https://www.rsc-bd.org/en/factories. The Accord website is currently under development.

- DIAGRAM 1- Follow-up inspections at covered factories



8

Follow-up and targeted inspections at covered factories

Total Follow-up inspections to date: 29.857

The RSC engineers are monitoring progress and verifying implementation of CAPs. Follow-up inspections are conducted (Diagram 1) to verify that corrective actions have been completed correctly.

After the engineers have undertaken a follow-up inspection, they generate a detailed report and update the CAPs.

The detailed report is sent to the factory, the responsible company signatories and the union signatories. This report includes an explanation of any new findings and pictorial evidence of remediation. The updated CAP is published on both the Accord and RSC websites, ° showing the progress status of each finding and any new findings.

From September 2021, the International Accord Steering Committee decided not to continue covering factories with no responsible brands, and therefore the number of reported follow up inspections at those factories is no longer reported on. The RSC continues to cover factories with no responsible Accord brands.

In addition to regular follow-up inspections, RSC engineers are conducting targeted inspections (see Table 2), including the following:

- Testing & commissioning verification inspections (T&C VIs) aim to verify that the installation of the fire detection and alarm system has been completed.
- **Pre-T&CVI visits** involve on-site documentation and equipment reviews at factories so that RSC engineers can determine whether the factory is ready for a full functional T&CVI.
- Negative suction non-compliance-related inspections. T&CVIs conducted in early 2018 revealed that approximately a third of Accord-covered factories had installed the pump of the fire protection/hydrant/ sprinkler systems using negative suction, which is non-compliant with the Accord inspection standard (NFPA). Inspections have since been conducted at Accord factories to identify solutions to resolve the negative suction situation, such as installing a vertical turbine fire pump or changing the position of the water reservoir vis a vis the fire pump.

9. Available here: https://www.rsc-bd.org/en/factories. The Accord website is currently under development.

- TABLE 2 - Targeted inspections at covered factories to date

TOTAL	2,121
Inspections in response to safety complaints, post incident, immediate fire/structural/electrical/boiler safety concern, and factory walk-throughs	117
Boiler safety inspections	84 ⁸
Negative suction non-compliance-related inspections	233
T&CVI Final verification inspections	134
Pre-T&CVI visits	857
Testing & commissioning verification inspections (T&CVIs)	696

8. The number of visual boiler safety inspections conducted by the RSC in the period September to November 2021.

• **Boiler safety inspections.** Between 2018-2020 the Accord ran a Pilot Boiler Safety Programme at Accord-covered factories.

Initial boiler safety inspections conducted at 20 Accord-covered factories revealed significant boiler safety hazards (see Annex 3), including non-compliant or missing boiler components/parts and a lack of certification. The boiler safety findings have been included in the factories' CAPs.

Boiler safety is being integrated in the RSC's inspection and remediation programmes, which means that all factories listed by Accord signatory companies will receive boiler safety inspections.

Factories requiring (Detailed) Engineering Assessments (D/EAs)

– TABLE 3 – (D)EA Status

Factories required to conduct a (D)EA	1,108
Pending submission by factory	5
Pending review	2
Accepted, pending on-site verification	13
Fully accepted after on-site verification of alignment between (D)EA documentation and the physical building(s)	1,014
Partly accepted, partly pending submission by factory/review	74

If the initial inspection indicates potential structural weakness, factories are required to undertake a structural (Detailed) Engineering Assessment (D/EA), including as-built drawings, engineering tests, preparing load plans, and developing retrofitting drawings. (D)EAs are conducted by structural engineers hired by factories and submitted to the RSC for review.

Once the (D)Eas are accepted, the factories are required to complete the structural remediation and retrofitting work.

Table 3. shows the number of covered factories at different stages in the (D)EA development, review and approval process. The RSC Chief Safety Officer is responsible for the review and approval of the (D)EAs.

- (D)EA pending submission by factory Based on the findings of the initial structural safety inspection, the factory is required to undertake a structural (Detailed) Engineering Assessment.
- (D)EA pending review The factory has submitted their (D)EA and the RSC is in the process of reviewing it.

- (D)EA accepted, pending on-site verification The RSC has reviewed and accepted the (D)EA based solely on the documentation submitted as part of the (D) EA. The RSC is yet to conduct an on-site verification of the information submitted in the (D)EA i.e. to verify that the documents align with the physical building(s).
- (D)EA fully accepted All required (D)EA documentation has been accepted and also verified by the RSC to be in alignment with the physical building(s). Structural retrofitting can commence.
- (D)EA partly accepted, partly pending submission by factory/review The RSC reviewed the (D)EA and accepted part(s) of it e.g. the (D)EA of one building part of a compound with several buildings. The remaining part(s) of the (D)EA must be (re-)submitted and reviewed. Structural retrofitting based on the accepted part of the (D)EA can commence.

The following may also apply: all parts of the (D)EA had been previously accepted and verified as being in alignment with the physical building(s); but a subsequent follow-up inspection revealed discrepancies e.g. physical building no longer aligned with the design or the factory made a change in Load Plan. In this case, structural retrofitting based on the accepted part of the (D)EA relating to the discrepancies found during the follow-up inspection must be ceased until the updated documents are re-submitted by the factory and reviewed by the RSC.

Factories requiring Fire Systems Design

- TABLE 4 - Fire Systems design & drawings requiring approval

	Fire Alarm and Detection system (FADS)	Fire Suppression system (SUPS)
Factories where FADS/SUPS is required	1,325	1,106
Factories with FADS/SUPS design accepted	1,215	1,003
Factories with FADS/SUPS design pending review	66	62
Factories with FADS/SUPS design pending submission	44	41

The fire safety inspections at covered factories may result in the requirement of the factory to install a fire alarm and detection system and/or a fire suppression system. The design drawings for these systems must be submitted for review and acceptance prior to installation of the system to ensure they meet the required standard. The RSC Chief Safety Officer is responsible for the review and approval of the fire systems' design and drawings.

Table 8 shows the progress made by factories towards completion of the installation of their fire detection and protection systems.

Factories requiring temporary evacuation

Based on the Accord signatories' requirements, 81 factory buildings have been required to (temporarily) evacuate since the inspection programme began in 2014, as the initial or follow-up inspections revealed a severe and imminent risk of structural failure or severe electrical and fire hazards. The most recent temporary evacuation took place on the 5th of March 2022.

Findings indicating that the structural integrity of the building falls below the acceptable level of safety include:

- Highly overstressed columns;
- Cracks in beams and floor slabs;
- Discrepancies between design information and building structure;
- Inadequate additional construction onto cantilevers.

In these cases, the RSC Chief Safety Officer requires the responsible Accord company signatories to ensure the factory owner evacuates the building and stops Accord company production until it is determined the building is safe for reoccupancy.

In over 200 factories, immediate load reduction measures were required such as removal of storage or emptying of water tanks to prevent the risk of a building collapse and continue (partial) production.

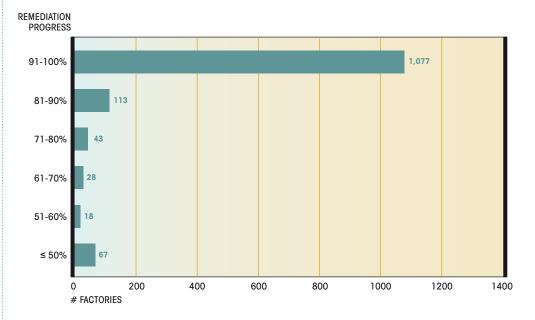


The completion of safety remediation at the approximately 1,400 factories supplying to Accord company signatories is monitored through approximately 300 follow-up inspections each month. Since June 2020, all safety inspections at covered factories are being conducted by the RSC, following Covid-19 precautionary measures implemented specifically for the inspection process (see section 'Impact of the Covid-19 pandemic on the inspections and workplace programmes'). The Accord Secretariat further conducts targeted remediation review meetings with individual signatory companies to identify high priority factories where remediation must be accelerated.

- DIAGRAM 2 - Remediation progress of safety issues identified during initial inspections

DIAGRAM 3 – Current status of initial remediation at covered factories (with an approved CAP)





Factory remediation status

- TABLE 5 - CAP status vs. year of initial inspection

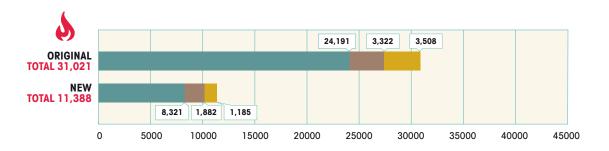
Year of initial inspection	Total factories with initial inspection conducted that year	CAP behind schedule The CAP is in implementation but one or more timelines have not been met	CAP on track The CAP is in implementation and all timelines have so far been met	Initial CAP completed All issues identified in the initial inspections have been verified as corrected	CAP not implemented The factory does not agree to implement the CAP and as a result the supplier is ineligible for business with Accord signatory companies (see Section 8. Non- compliant suppliers)	CAP not finalised/no CAP The CAP is either incomplete or not yet approved
2013	83	31	13	32	7	0
2014	793	335	68	265	125	0
2015	181	80	12	53	36	0
2016	84	37	12	24	11	0
2017	132	92	14	17	9	0
2018	81	56	12	7	6	0
2019	71	60	5	3	2	1
2020	23	21	2	0	0	0
2021	102	91	2	0	1	8
2022	12	0	0	0	0	12
TOTAL	1,562	803	140	401	197	21

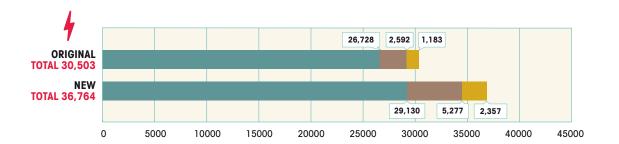
A CAP is marked behind schedule if one or more items have passed the agreed final timeline. Being behind schedule therefore does not necessarily mean that no progress has been made at all. Factories which fail to make continual progress on all CAP items will be issued with a warning letter. Continued failure to make progress on all CAP items will lead to a second warning letter and notice of termination in case of no improvement.

Factories which do not make sufficient progress after the second warning receive a notice of termination which means they are ineligible to supply Accord company signatories. In parallel to this notice and warning procedure, the RSC and Accord hold meetings with factories and company signatories to identify barriers to remediation and ensure remediation support (technical and financial) is available to the factory if needed.

Remediation progress of safety findings

- DIAGRAM 4 - Remediation status of original & new safety findings (in published CAPs)





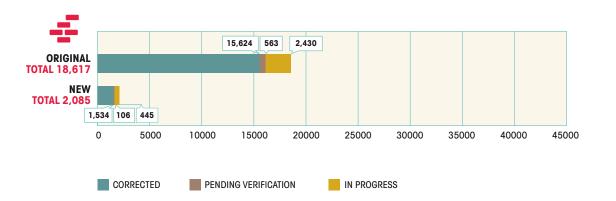


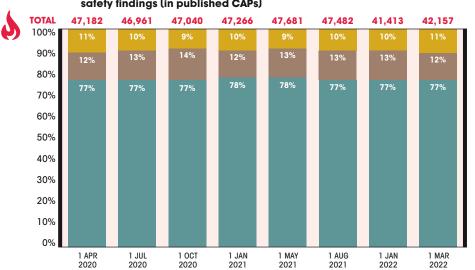
Diagram 4 provides an overview of the status of inspection findings that are reported in the published CAPs.

- **In progress:** This is the default status for an inspection finding. It means that remediation of the inspection finding is underway.
- **Pending verification:** The Accord / RSC has been informed that the finding has been corrected but the RSC is yet to verify this.
- **Corrected:** The finding has been verified as corrected by the former Accord, current RSC engineers through their follow-up verification visits.

The total findings in published CAPs include original findings and new findings.

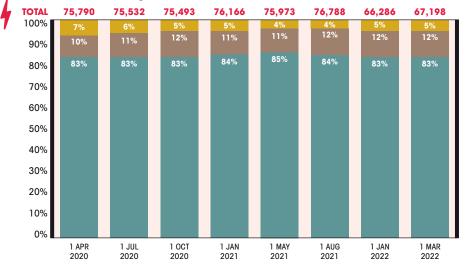
- Original findings: Findings from the Initial inspections.
- New findings: Findings from follow-up inspections.

The Accord experience with remediation verification thus far, indicates that around 23 percent of issues pending verification will be reclassified as 'in progress' after a follow-up inspection. This is attributed to discovering during a follow-up inspection that the issue was either not corrected or inadequately corrected.

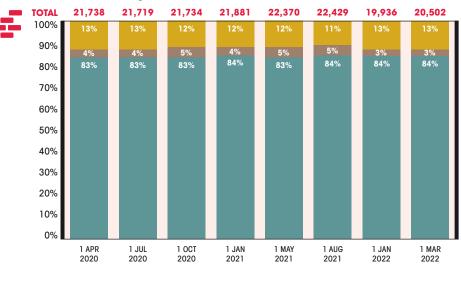


– DIAGRAM 5 – Remediation progress of total original & new FIRE safety findings (in published CAPs)

- DIAGRAM 6 - Remediation progress of total original & new ELECTRICAL safety findings (in published CAPs)



– DIAGRAM 7 – Remediation progress of total original & new STRUCTURAL safety findings (in published CAPs)



% CORRECTED

% PENDING VERIFICATION

% IN PROGRESS

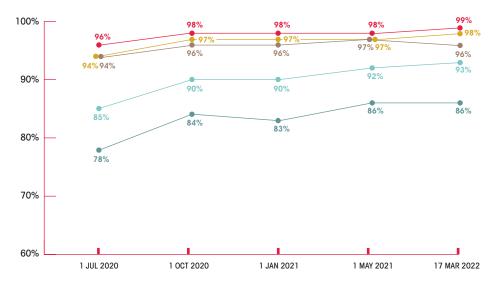
Progress and completion rates of common remediation items

Most of the findings that are reported in published CAPs are common to many factories (see Annex 1). The Accord and the RSC track the total number of findings by categories and subcategories.

- TABLE 6 - Status of most common FIRE findings at covered factories

Finding	No. of factories where the finding was identified	No. of factories where the finding is still outstanding
Lockable/collapsible gates	1,285	9
Inadequate egress lighting	1,318	51
 Lack of fire separation in hazardous areas 	1,233	92
Non-compliant exit stair openings	1,318	190
Storage in means of egress	1,192	28

- DIAGRAM 8 - Remediation progress of most common FIRE findings at covered factories



- TABLE 7 - Status of safe egress at covered factories

Status safe egress	No. of factories
All safe egress measures verified as corrected	543
At least one finding related to safe egress pending verification and no finding outstanding	401
At least one finding related to safe egress outstanding	163

Safe egress measures cover all the requirements to ensure a safe evacuation of the building in case of fire, including removal of lockable/collapsible gates, removal of storage in means of egress, installation of exit lighting and signs in compliance with the standard, and providing a fire-protected pathway to the exterior of the building.

Installation of Fire Detection and Protection Systems at covered Factories

Once the fire systems' design has been accepted, covered factories are required to follow the steps described below:

- Install the fire system(s). Components of the fire detection and protection systems which are available locally can be installed immediately, where supporting evidence confirms they are compliant with relevant standards and tested and certified by a 3rd party accredited independent testing laboratory. For example, compliant cabling, the conduits, the pipes and fittings of a sprinkler system can be purchased locally and installed whilst waiting for imported components to arrive. For fire system components that need to be imported, factories need to open a letter of credit (LC).
- 2. Pre-Testing & Commissioning Verification Inspection (pre-T&CVI) on-site documentation and equipment review. The purpose of pre-T&CVI on-site reviews is for the engineers to determine whether the factory is ready for a fully functional T&CVI. Pre-T&CVI reviews were introduced by the Accord in May 2019 in an effort to increase the number of factories that 'pass' the T&CVI meaning that the fire systems are found to be adequately installed to standard and fully functional.
- **3. Undergo a full T&CVI.** The purpose of this inspection is to verify that the systems are fully functional and installed to standard. Where possible, the engineers conduct the T&CVI of both the fire detection and alarm system and the fire sprinkler system during the same inspection at the factory.

- TABLE 8 – Status installation of fire detection and suppression systems

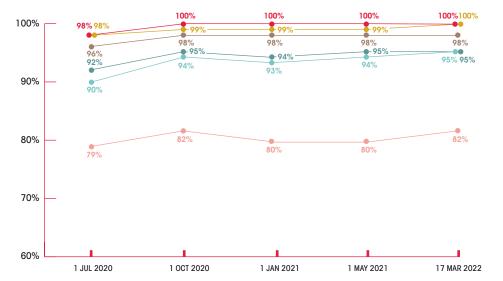
	Fire Alarm and Detection System (FADS)	Fire Suppression System (SUPS)
Factories where the fire system has been verified as adequately installed to standard and fully functional	358	239
Factories pending a Final Verification	52	23
Factories pending Testing & Commissioning Verification Inspection (T&CVI)	151	132
Factories pending pre-T&CVI on-site documentation & equipment review	199	161
Factories where system installation is ongoing	461	440
Factories where installation is yet to commence	36	38

^{10.} Factories pending a final verification inspection have 'failed' the T&CVI with only minor issues; to ensure these issues have been corrected and the fire detection and protection systems are fully functional, a final verification is required.

- TABLE 9 - Status of most common ELECTRICAL findings at covered factories

Finding	No. of factories where the finding was identified	No. of factories where the finding is still outstanding
 Lack of cable support and protection 	883	14
• Lack of Lightning Protection system (LPS)	843	40
No Single Line Diagram (SLD)	834	174
 Inadequate circuit breakers 	769	41
 Hazardous accumulation of dust and lint on electrical equipment 	751	1
 Unsafe earthing equipment 	701	3

- DIAGRAM 9 - Remediation progress of most common ELECTRICAL findings at covered factories



- TABLE 10 - Status of most common STRUCTURAL findings at covered factories

Finding	No. of factories where the finding was identified	No. of factories where the finding is still outstanding
 Lack of management load plan 	978	63
 Inconsistency with building plan and drawings 	1,030	94
 Incorrect implementation of existing load management plan 	886	49
 Lack of design check against lateral load 	728	80

- DIAGRAM 10 - Remediation progress of most common STRUCTURAL findings at covered factories



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Ensuring remediation is financially feasible

Article 31 of the International Accord requires signatory companies to negotiate commercial terms with their suppliers which ensure that it is financially feasible for factories to maintain safe workplaces and comply with the remediation requirements instituted by the RSC Chief Safety Officer.

Signatory companies have used various types of financial assistance to make it financially feasible for their supplier factories to remediate including guaranteed order volumes for longer periods, higher volumes, soft loans, order pre-payment to improve cash-flow or direct cash assistance.

Finance plan approved

As part of every Corrective Action Plan, the Accord requires signatory companies and their suppliers to confirm that a remediation finance plan is agreed for each factory and the type of finance plan agreed. The Accord obtains confirmation of agreed finance plans from all signatories and factories. To date, 1,070 finance plans have been reported as confirmed in the Accord factory database.

Finance requests

When a factory expresses the need for financial support to cover remediation costs, the Accord will hold a meeting with the factory owner and all responsible brands. The meeting is scheduled with a minimum of 30 days' notice to give the supplier time to submit the required information for the brands' review - as outlined in the Financing Remediation Guide. Such information will typically include the list of materials/works required to complete the CAP items for which financial support is being requested, written quotations from service providers, as well as financial documentation for the previous three years. If the documentation is incomplete at the meeting, the factory will be given an additional 2 weeks to fulfil the request for information.

The factory must demonstrate the need for financial support and the costs of outstanding remediation. The brands must evaluate the factory's request and inform the Accord of their decision within 2 weeks of having received the information from the factory. If the factory provides all relevant documents but the brands do not respond or the process does not result in a mutually acceptable agreement that ensures completion of remediation, the Accord will refer the finance request to the

Steering Committee, who will decide whether the brand is in breach of its Accord obligations under Article 31.

If the factory does not properly follow-up or cooperate during the finance request process, then the request will be dismissed. To date, 168 remediation finance requests from factories have been recorded by the Accord (Table 11), of which 74 have been resolved.

- TABLE 11 - Status of Finance requests as of 17th March 2022

(active and inactive responsible factories)

	Pending	9
Desuceda	Resolved 7	
Requests	Referred to the Steering Committee	0
	Dismissed	45
	Closed while the finance request was being processed	14
Factories	Made ineligible for business with Accord brands	25
	Relocated to a new building; the request to finance remediation became moot	1
TOTAL		168

Factory Remediation Fund

The Accord Factory Remediation Fund was established in 2017 to support covered factories that no longer had any Accord signatory companies as customers. In July 2019, the Fund became available to all Accord-covered factories meeting certain criteria, including those that produce for Accord company signatories.

The funds made available through the Remediation Fund were distributed in several instalments, subject to factory cooperation, proof of payment towards remediation works, and verified completion of the remediation commensurate with each preceding instalment.

The Factory Remediation Fund closed on 31st May 2020. The funding applications that were under consideration as of 31st May 2020 have therefore been formally closed. Those factories were invited to raise finance requests directly with the responsible Accord companies, under Article 17 of the 2018 Accord.

The International Accord Secretariat monitors the Factory Remediation Fund disbursement, subject to a Fund Agreement with each factory.

- TABLE 12 - Status of Factory Remediation Fund

COVERED FACTORIES	
Factories receiving financial remediation support through the Fund	21
FUNDING STATUS AS OF 17 TH MARCH 2022	
Total funding committed	\$1,405,796
Percentage of total funding disbursed	77% (\$1,083,722)
REMEDIATION PROGRESS OF COVERED FACTORIES	
Status of Fund agreement at covered factories	
100% fulfilment of agreement	5 factories
51-99% fulfilment of agreement	10 factories
<50% fulfilment of agreement	6 factories
Remediation progress of safety issues covered by the Fund agre	ements
Remediation issues to be financed ¹¹	34
Including: • Fire safety: installation of Fire Suppression Systems (wat systems, sprinklers), Fire Pumps, and Fire Alarms; and co Separation (incl. installation of fire doors)	
 Electrical safety: installation of Lightning Protection Sys cabling and Earthing Systems, and development and u Diagrams 	
 Structural safety: completion of structural remediation columns, beams, foundations, slabs 	n, incl. strengthening of
Remediation issues verified as corrected	20
Remediation issues pending verification	3
Remediation issues in progress	11

11. A 'remediation issue' may cover more than one CAP item.

Functioning Safety Committees and an informed workforce are key to ensuring that factories become and remain safe workplaces. Joint labour-management Safety Committees at covered factories are trained to address and monitor workplace safety and all the workers in the factory are informed about essential workplace safety.

Since June 2020, the Safety Committee and Safety Training Programme has been implemented by the RSC.

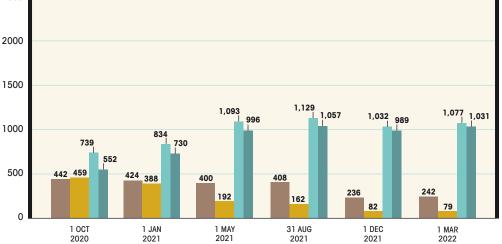
The role of a Safety Committee includes:

- Conducting safety checks (walk-throughs) at the factory to identify safety hazards;
- Responding to employee complaints and suggestions about safety and health;
- Reviewing company accident reports to learn how such accidents can be prevented;
- Communicating about safety and health issues to workers;
- Meeting regularly, at least once every three months.

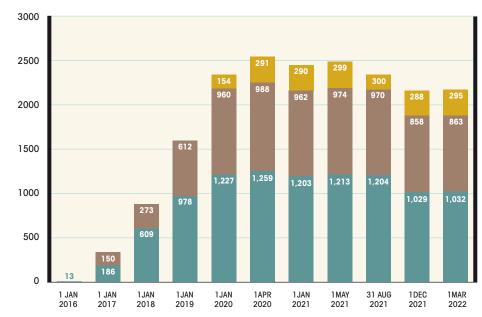
With over 50 staff members in the Training department, the training efforts are focused on building these committees, making them effective in addressing and monitoring safety and health issues on a day-to-day basis, and integrating their responsibilities into the functions of the RSC.

- DIAGRAM 11 - Status of Safety Committee training programme at covered factories (8 session Safety Committee training curriculum)





- DIAGRAM 12 - Advancement of All Employee Meetings to inform workers of workplace safety



- All Employee Meetings 1. On safe evacuation and safety hazards in RMG factories Total Participants AEMs 1: 1,731,890 workers
- All Employee Meetings 2. On workers' rights and responsibilities with respect to a safe workplace Total Participants AEMs 2: 1,547,890 workers
- All Employee Meetings 3. On health hazards and the right to Freedom of Association in relation to health & safety / Number of covered factories that completed the Safety Committee and Safety Training Program Total Participants AEMs 3: 740,025 workers

SAFETY COMMITTEE & SAFETY TRAINING

The Safety Committee and Safety Training Programme consists of the following key components:

- 1. Initial Meeting with Factory Management and signatories. The aim of this meeting is to introduce the Safety Training Programme and to agree on the all-employee meeting dates.
- 2. 8-Session Safety Committee Training Curriculum including the Safety Committee's role in remediation, complaints handling, joint problem solving, hazard identification and safety monitoring systems. To date, the Accord and RSC trainers have conducted 8,874 Safety Committee training sessions at covered factories. During the Covid-19 pandemic, remote Safety Committee trainings and Safety Committee meetings were conducted via teleconference.

2018 Transition Accord training elements on Health Hazards and the Right to a Safe Workplace

Under the 2018 Transition Accord, the the Safety Committee and Safety Training Programme was extended to include an 8th training session and a 3rd All Employee Meeting with a focus on common health hazards and workers' right to Freedom of Association in relation to health & safety. These training elements were rolled-out at factories from September 2019.

3. All Employee safety informational meetings (AEMs). During these meetings, all workers in the factory are introduced to the members of the Safety Committee. The trainers further provide information on how to identify and reduce common safety hazards, how to safely evacuate the factory in case of fire or other emergencies, and how to use the Safety and Health Complaints Mechanism available to workers at covered factories. At the end of each meeting, the workers receive a booklet reiterating the information presented. Due to the Covid-19 pandemic, AEMs were suspended from March 2020 to December 2021.

- 4. Factory walk-throughs. After training sessions #4, #5, and #6 the factory Safety Committee together with the trainer conduct a walk-through of the factory to identify actual or potential safety hazards, that are then reported to the factory management. Most of the issues found during these factory walk-throughs relate to inadequate use of machines, improper maintenance of fire and electrical equipment, obstacles on the work floor, or poor ventilation and lighting. Once the factory management inform that these hazards have been fixed, the engineers will conduct a verification inspection. To date, 4,090 walk-throughs have been conducted at covered factories. Factory walk-throughs were suspended in March 2020, due to the Covid-19 pandemic. They were resumed remotely in January 2022, with the Safety Committee following RSC-developed guidelines on how to maintain Covid-19 protective measures during the walk-through and utilising a sample checklist developed by the RSC trainers.
- 5. Ongoing support for effective functioning of Safety Committees. The trainers facilitate the first meetings of the Safety Committees and encourage active involvement of the Safety Committee Co-Chairs in safety follow-up inspections, thereby enabling a skills transfer and demonstrating the importance of the Safety Committee in all aspects of factory safety. Wherever possible, the Safety Committee is involved in monitoring the implementation of Accord signatories' safety requirements that may emerge from any factory inspection.

In September 2020 the RSC Training Department held remote boiler safety informational sessions to introduce boiler safety to the Safety Committees at 11 covered factories that received an initial boiler safety inspection through the Accord Boiler safety Pilot (see page 9). The RSC is preparing to add a boiler safety informational session to the Safety Committee and Safety training Programme, including presentation of the factory's boiler safety inspection report and CAP to the Safety Committee, and informing the Committees about common boiler safety hazards and boiler safety maintenance.

SAFETY & HEALTH COMPLAINTS MECHANISM

The Accord signatories provide workers and their representatives at the factories they supply from with a Safety and Health Complaints Mechanism to remedy health and safety concerns which are not being effectively addressed at the factory level. Workers and employees at covered factories can raise concerns about health and safety risks safely, and if they choose so, confidentially, through this Safety Complaints Mechanism. Since June 2020, the Complaints Mechanism has been operated by the RSC, following the same procedures to handle complaints as developed by Accord signatories under the 2013 and 2018 Accord.

- DIAGRAM 13 - Number of complaints received under the Accord signatories' Complaints Mechanism between 1 May 2021 - 17 March 2022

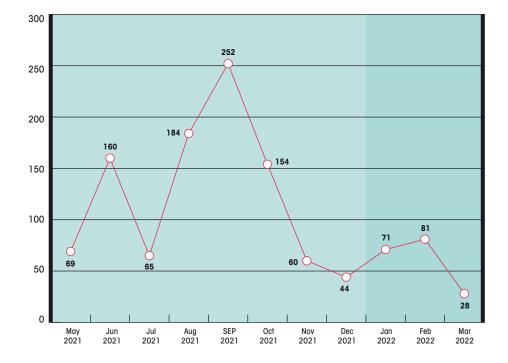
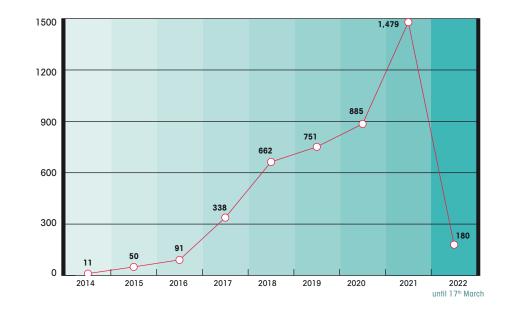


 DIAGRAM 14 – Total number of complaints filed through the Accord signatories' Complaints Mechanism



Under the Accord, signatories commit to ensure workers' right to a safe workplace are ensured, including:

- The right to refuse unsafe work
- The right to participate in the work of their factory Safety Committee
- The right to file a complaint when they see a safety problem in their factory
- The right to protection against reprisal for reporting safety-related matters
- The right to Freedom of Association in relation to protecting their own safety

The Accord signatories' Complaints Mechanism ensures that safety and health concerns at the covered factories are properly addressed and remediated, and that the right to refuse unsafe work is upheld where necessary.

Workers who utilize the Safety and Health Complaints Mechanism or who exercise the right to refuse unsafe work must not face reprisal. In case of reprisal, the Accord signatories require that violations be remedied, failing which, the notice and warning provisions of the Escalation Protocol would apply.

SAFETY & HEALTH COMPLAINTS MECHANISM

- TABLE 13 - Total complaints received as of 17th March 2022: nature of the allegations

Total complaints (unique) ¹²	4,453
Non-OSH	2,793 (63%)
Occupational Safety & Health (OSH)	1,753 (39%)

- TABLE 14 - Occupational Safety & Health (OSH) complaints received as of 17th March 2022: nature of the allegations

Total OSH complaints (unique) ¹³	1,753
Reprisal for having filed a complaint	40
drinking water supply, excessive heat, workplace violence, forced overtime, denial of maternity pay/leave rights, sexual harassment)	1,545
Working environment related (incl. Covid-19 related, unsafe	
Engineering (structural/fire/electrical safety)	196

- TABLE 15 – Occupational Safety & Health (OSH) complaints received as of 17th March 2022: status

In progress	130
Closed	1,623
Total OSH complaints (unique)	1,753

All complaints are initially assessed to determine if they fall under the Accord and RSC's safety and health remit. Safety and health related concerns are investigated by qualified staff and their findings and remediation requirements are announced to all employees at the factory by the assigned case handler. The complaints falling outside the health and safety remit (i.e. Non-OSH complaints) are forwarded to Accord brand & labour signatories and the Factory Management.

During the course of investigating matters referred to the Accord signatories' Complaints Mechanism, the RSC case handlers will determine remediation requirements in regard to Safety and Health. The RSC can work with Complainants and Factory Management to ensure that the requirements are fully but smoothly implemented.

If the Factory Management does not comply, the Accord signatories will implement a notice and warning process leading to termination of the business relationship if no progress is being made.

12. The total number of unique complaints is lower than the total number of complaints alleging OSH and Non-OSH concerns, as some complaints have both OSH and Non-OSH aspects. The Accord Signatories' complaints mechanism only processes the OSH aspects of such complaints.

13. The total number of unique OSH complaints is lower than the total number of complaints categorized by nature of the allegations, as some complaints include more than one allegation.

SAFETY & HEALTH COMPLAINTS MECHANISM

Covid-19 related complaints

Following an Accord Steering Committee decision on 28th April 2020, all complaints related to the Covid-19 health crisis are processed. All Covid-19 related complaints are therefore included as complaints within the OSH complaints mechanism's scope in the statistics presented.

These complaints largely fall into the categories included in Table 17.

- TABLE 16 - Covid-19 related complaints received as of 17th March 2022: nature of the allegations

Non-payment of separation from employment benefits	125
Non-payment of wages	57
Termination of employment	45
Retrenchment	40
Forced resignation	40
Risks to health	36
Non-payment of maternity benefits	29
Under-payment of wages	18
Lay-off	10
Worker unrest	9
Threats	6
Physical abuse	3
Unhygienic toilets	2
Denial of sick pay	1
Total unique Covid 19 complaints ¹⁴	302

14. The total number of unique Covid-19 related complaints is lower than the total number of complaints categorized by nature of the allegations, as some complaints include more than one allegation.

NON-COMPLIANT SUPPLIERS

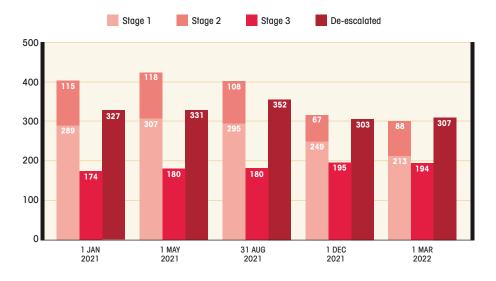
Supplier factories failing to participate in the safety programmes prescribed by the legally binding International Accord agreement between global companies and trade unions, go through a notice and warning (escalation) procedure according to Article 30 of the International Accord and article 24q of the RSC.

Since June 2020, the escalation protocol and procedures are implemented by the RSC team in coordination with the Accord Secretariat.

The escalation procedure consists of three stages:

- 1. A notification of non-compliance;
- 2. A notice and warning letter; and
- 3. Termination of business relationship with signatory companies.

- DIAGRAM 15 - Status of non-compliant factories in different stages of escalation



Examples of factory non-compliance that trigger the implementation of the escalation procedure include:

- refusal to temporarily evacuate the factory;
- a lack of significant progress in finalizing corrective action plans or completing required safety renovations;
- refusal to resolve worker complaints on safety issues;
- a lack of cooperation with RSC trainers, case handlers and engineers.

If no action is taken following the notification of non-compliance or the Accord signatories do not see adequate progress, the supplier factory will be escalated to stage 2 and the signatory companies in the factory will be required to issue a warning letter to the supplier.

At this stage, the RSC and Accord hold a meeting with the Factory Management and the responsible Accord signatory companies to discuss the non-compliances. For example, if the factory made no progress in implementing its CAP, the parties will discuss the inadequate remediation; the immediate measures that must be taken, their corresponding timelines, and the necessary support to make remediation financially feasible.

If the supplier meets all the requirements within the specific timelines of the noncompliance notifications, as well as remediation timelines agreed in the stage 2 meetings for other outstanding CAP items, the factory may be de-escalated.

If these requirements are not met, the supplier may be escalated to stage 3 and signatory companies will terminate their business relationship with this supplier. In accordance with Article 24q of the Articles of Association of the RSC, stage 3 of the Escalation Protocol will be complemented by the withdrawal by BGMEA or BKMEA of the Utilization Declaration (UD) which is mandatory to export apparel from Bangladesh. Prior to the signing of a Memorandum of Understanding between the Accord and the Bangladesh Garment Manufacturers and Exporters Association (BGMEA) on 8 May 2019, the Accord Escalation Protocol applied to all RMG companies controlled by the same group owner and was not contingent on UD withdrawal (failure thereof) at the non-compliant factory.

The application of group ineligibility means that the number of supplier factories

NON-COMPLIANT SUPPLIERS

ineligible for business with Accord signatories is larger than the number of factories escalated to Stage 3. As of 1st March 2022, the total number of ineligible supplier factories is 204 (see Table 1). The list of ineligible suppliers is available on the RSC and Accord websites¹⁵.

Ineligibility for Accord company production applies for a minimum period of 18 months and until the conditions for requalification have been met. The RSC and Accord will work with the labour and company signatories in an effort to ensure that any affected workers are offered employment with safe suppliers.

Factories made ineligible as per article 30 of the Accord and article 24q of the RSC Articles of Association are handed over to the Inspector General of the Government of Bangladesh's Department of Inspection for Factories and Establishments. The factories' inspection reports and Corrective Action Plans are handed over for the Inspector General's attention and authority to address the ongoing safety concerns at these factories.

^{15.} www.rsc-bd.org/factories. Apply filter 'Remediation status: ineligible'. The International Accord website is currently under development.

9

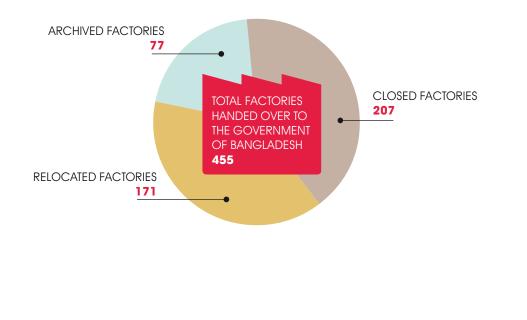
FACTORIES HANDED OVER TO THE GOVERNMENT OF BANGLADESH

When covered factories close down, relocate, or stop manufacturing garments, home textile, and fabric and knit accessories, they are marked as 'closed' or 'archived' in the jointly shared Accord-RSC factory database and the monitoring responsibility is handed over to the Government of Bangladesh. The list of factories handed over to the Government is published on the RSC and Accord websites¹⁶.

29

Factories handed over to the Department of Inspection for Factories and Establishments (DIFE) and to the National Action Plan (NAP)

- DIAGRAM 16 - Overview of factories handed over to the Government of Bangladesh



Closed and relocated factories

Factory accounts are closed when the RSC has verified that there is no production in the building. For factories that relocate and remain listed by Accord company signatories, a new factory ID is created and the RSC will conduct an initial inspection at the new building.

Covered factories are required to notify the / RSC of a closure or a relocation as soon as possible. Upon receipt of information of a factory closure or relocation, the closure verification procedure will be applied. This includes obtaining confirmation in writing from the factory management and the responsible brands, obtaining information on workers' severance payments and a closure verification visit.

When sufficient information to consider a covered factory closed or relocated has been received, the full electrical, structural and fire initial inspection reports & latest CAP (if available) will be transferred to the Department of Inspection for Factories and Establishments (DIFE)¹⁷.

Archived factories

The Accord agreement covers RMG, fabric & knit accessories, and at the option of signatory companies, home textile factories producing for Accord signatory companies, or where production took place at the time of scheduling the initial inspections.

Factories not meeting these criteria are considered "out-of-scope" of the Accord agreement, and the Accord has no mandate to monitor remediation at these factories.

The inspection reports of those factories that are out-of-scope but have nonetheless received one or more initial inspections, are being transferred to the Government of Bangladesh and ILO led inspection programme of the National Action Plan (NAP) to ensure that the safety hazards identified through the Accord Signatories' inspection programme can be addressed through the appropriate authority.

https://www.rsc-bd.org/factories-handed-over The International Accord website is currently under development.

^{17.} The factory's documentation is not transferred in the following cases: i) the building is being utilised by another covered factory and the remediation continues to be monitored, or ii) the factory has been closed through a Review Panel decision.

Overview of common fire, electrical, and structural safety findings identified at covered factories

Most of the findings that are reported in published CAPs are common to many factories. The total number of findings are tracked by categories and sub-categories. The fire, electrical and structural categorization allows for further analysis¹⁸ of the most common safety hazards across all the factories inspected under the Accord prescribed Safety Program.



Fire Safety Hazards identified at Initial Inspections:

- 97% of Accord factories lacked safe means of egress. Lockable/collapsible gates, storage blocking exits and inadequate egress lighting were the most common hazards.
- Exit stair openings, the fire pump rooms, warehouses and storages were the most common areas identified in factories as lacking a proper fire separation.
- 91% of factories required an adequate fire detection & alarm system.



Before remediation (left) – collapsible gate; After remediation (right) – fire door installed



Fire separation: before (left) and after remediation (right)

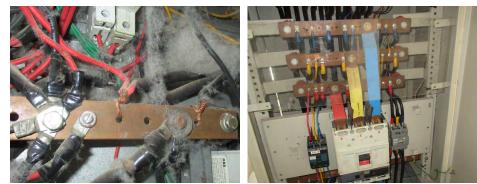


Installation of fire protection systems: hydrant system (left) and sprinkler system (right)

18. The percentages listed in this section reflect the number of factories with at least one finding in a given category as of 1 October 2017.

Electrical Safety Hazards at Initial Inspections:

- Inadequate support and protection of cables was the most common electrical hazard identified.
- Deficient circuit breakers, unprotected openings and unsafe earthing (grounding) systems were found at more than 70% of factories.
- More than 60% of factories had dust and lint accumulated on electrical wiring, which can cause sparks and start a fire.



Electrical cabling: before (left) and after remediation (right)



Before remediation (left) – unsupported and unsafe cables; After remediation (right) – cables are adequately supported; cable tray installed



Structural Safety Hazards at Initial Inspections:

No management load plan was in place, or the existing plan was being poorly implemented at almost 70% of factories. Using a management load plan prevents excess structural cracks and building collapses by avoiding weight in certain parts of the building.

Undocumented constructions and inconsistencies with the structural design drawings were found at more than 70% of factories. In just over 10% of the factories inspected, this resulted in an immediate requirement to reduce the loads in the building, such as storage or water tanks.

Lateral instability was identified at 62% of factories. Following the initial inspection, almost half of the factories had to conduct a design check against lateral load. This design check involves verifying that the building is adequately designed for potential wind load. For example, the maximum velocity of wind during a storm has to be considered as pressure on the building and the design check shows how the building will react to this.



Using a management load plan prevents excess structural cracks and building collapses by avoiding weight in certain parts of the building.



In order to strengthen the lateral stability of the building, the installation of cross-bracing is required.

Structural findings leading to temporary evacuation at a covered factory & pictorial evidence of ongoing remediation

Findings: excessive wall cracks and cracks in beams and ceiling slabs







Structural retrofitting ongoing. After the structural remediation had been verified as completed, the factory was determined safe for re-occupation and resumption of production.





Corrosion of the boiler wall due to calcium build-up; this can reduce the efficiency of the boiler and lead to leakage of boiling water.



Left: Inadequate remediation of leakage from boiler shell by using clay; Right: Leakage on input fuel line - constitutes risk of explosion



Left: Uninsulated steam valves and flanges - increases the scorching risk for operators; Right: Rusted weld joint & symptoms of unburnt fuel - reduces efficiency and causes risk of explosion



Left: Faulty electrical wiring - makes the boiler unsafe to operate & constitutes a fire hazard; Right: Rusted blow down pipe - can cause leakage, increasing the scorching risk for operators

COLOPHON

TITLE

Quarterly Aggregate Report – on remediation progress and status of workplace programmes at RMG factories covered by the International Accord for Health and Safety in the Textile and Garment Industry / RMG Sustainability Council Bangladesh

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