



# FACILITY GUIDELINES

February 1, 2018

**Owned / Contracted Facilities**

Uniform Facility Compliance Audit Program

## FACILITY GUIDELINES

<b><u>Principle 1 - Legal and Ethical Business Practices:</u></b>	<b>3</b>
<b><u>Principle 2 - Child Labor:</u></b>	<b>4</b>
<b><u>Principle 3 - Forced Labor:</u></b>	<b>5</b>
<b><u>Principle 4 - Wages and Benefits:</u></b>	<b>8</b>
<b><u>Principle 5 - Hours of Work:</u></b>	<b>13</b>
<b><u>Principle 6 - Freedom of Association:</u></b>	<b>14</b>
<b><u>Principle 7 - Health and Safety:</u></b>	<b>16</b>
<b><u>Principle 8 - Nondiscrimination:</u></b>	<b>42</b>
<b><u>Principle 9 - Harassment:</u></b>	<b>43</b>
<b><u>Principle 10 - Women's Rights:</u></b>	<b>43</b>
<b><u>Principle 11 – Subcontracting:</u></b>	<b>44</b>
<b><u>Principle 12 - Monitoring and Compliance:</u></b>	<b>45</b>
<b><u>Principle 13 - Informed Workplace:</u></b>	<b>46</b>
<b><u>Principle 14 - Associate Residence (Dormitory):</u></b>	<b>46</b>
<b><u>Principle 15 - Facility Security:</u></b>	<b>48</b>
<b><u>Principle 16 - Environment:</u></b>	<b>50</b>

**Principle 1 - Legal and Ethical Business Practices:** VF Authorized Facilities must fully comply with all applicable laws of the countries in which they are located including all laws, regulations, and rules relating to wages, hours, employment, labor, health and safety, the environment, immigration, and the apparel industry. Employers must be ethical in their business practices.

### P1-1C

**Code Provision:** Determine if the facility is properly licensed, registered, and permitted to perform its current activities in the municipality where it operates.

#### ***Facility Guidelines***

- The facility must be properly licensed, registered, and permitted to perform its current activities in the municipality where it operates.
- The legal license for operating the facility must be valid and current. The use of the facility name and address for the business must correspond with the applicable municipal or provincial license or its equivalent.

### P1-2M

**Code Provision:** Determine if the facility maintains all relevant personnel documents and that such documents are completed, properly filled out, and up to date.

#### ***Facility Guidelines***

- The facility must maintain a complete personnel file for each associate including employment application, grievance history, records of pay increases or decreases, and accident reports for each associate. A copy of proof of age document must be included in the personnel file of each associate.
- For facilities with migrant associates, a copy of the work permit must be included in the personnel file.
- Labor contract/agreements, where required, must include associate's signature, be current and updated, and authorized by the related ministry as mandated by local law. A copy of the labor contract/agreement must be provided to the associate. The duration and term of the contract must comply with the local law.
- Any probation period must be defined and fixed based upon local law.

**Principle 2 - Child Labor:** No person shall be employed at an age younger than 15 (or 14 where consistent with International Labor Organization guidelines) or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15. All VF Authorized Facilities must observe all legal requirements for work of associates under 18 years of age, particularly those pertaining to hours of work and working conditions.

### P2-1C

**Code Provision:** Determine that the facility has processes designed to restrict hiring to persons above the age of 15 (or 14 where consistent with International Labor Organization guidelines or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15) and the processes are effectively implemented.

#### **Facility Guidelines**

- The facility must restrict hiring persons below the age of 15 (or 14 where consistent with International Labor Organization guidelines).
- A child labor policy must be established, and human resources personnel must be made aware of the policy requirements and be well trained in its application. Vigorous age verification must be part of this process, including stringent checks on the legitimacy of documentation. In countries where a national identity card is not available, two forms of age verification documents are required such as medical records, dental records, driver's license, right to vote card, etc. At least one of these documents must contain a photo ID.
- The facility must ensure that no children, as defined above, are allowed in the production area or within the confines of the facility including the canteen area, even if they are not working.
- The facility must have procedures if child labor is found. Including:
  - Providing a minimum wage stipend to the child until she/he reaches age 16 or the minimum legal working age, whichever is higher.
  - Providing tuition and uniform to attend school.
  - Offering a job to the child once he reaches the age 16 or the minimum legal working age, whichever is higher.
  - The facility must provide a health screening before departure and

compensation for transportation and accommodation for a child's relatives to take her/him back home.

### P2-2M

**Code Provision:** Determine that the facility complies with all legal requirements, including health checks, for employment of juvenile associates (under 18 years of age).

#### **Facility Guidelines**

- The facility must comply with all legal requirements for the employment of juvenile associates.
- The facility must maintain a list of all juvenile associates and must ensure that these associates are protected from working environments which could pose a danger to their health, safety or social development. Such working environment includes, but are not limited to, hazardous jobs and night shift work.
- Juvenile associates must not work longer hours than the law permits and must receive an annual medical checkup as required by law. Additionally, as required by local law, the facility must provide juvenile associates with occupational health and safety education, training, and maintain documentation of such.

#### **Best practice:**

- The facility should restrict hiring of all associates under 18 years of age.

**Principle 3 - Forced Labor:** VF Authorized Facilities will not use involuntary or forced labor - indentured, bonded or otherwise.

### P3-1C

**Code Provision:** Determine that the facility does not utilize involuntary, forced, indentured, or prison labor.

#### **Facility Guidelines**

##### Forced or Involuntary Labor

- The facility must not use or participate in recruitment or employment practice that indentures or bonds an associate to the workplace or which obtains labor or services using force, fraud, or coercion. The facility may not use prison labor

unless specifically required through VF contractual obligations.

- The facility must have a written policy regarding its treatment of all migrant associates, whether internal or foreign. The facility must effectively communicate its migrant associate policy to all migrant associates so that they are aware of their rights under the policy. Information must be made available in the associate's native language.

### Fees & Expenses

- The facility and recruitment agencies may not deduct from wages (by way of garnishments, levies, deposits, guaranteed monies or otherwise) costs or fees associated with employment, including required visas, health checks, employment registration, work permit, management fee, or recruitment agency/placement firm fees greater than one month of the base salary.
- The employer or recruiter may not utilize recruitment agency services conditional upon applicants paying for other goods and services such as travel, training, etc.

### Contracts of Employment

- Where possible, the facility must make every effort to employ migrant labor directly. Where recruitment agencies are used, these must be legally approved/registered recruitment agencies per country law (where applicable).
- General requirements regarding contracts of employment when employing migrant associates:
  - The terms outlined in the associate's written employment contract must be fully explained before departure from their home country. This includes conditions of employment and reasons for termination.
  - The employment contract must be written such that it is legally enforceable in the receiving country and written in the associate's native language.
  - The associate must receive a copy of the employment contract before leaving the country of origin.
  - The facility is responsible for any costs associated with changing the employment visa or other employment authorization documentation.
  - Migrant associates (or their family members) must not be threatened with violence (including sexual violence) nor denunciation to authorities to coerce them into taking up employment or preventing them from

voluntarily terminating their employment, at any time, without penalty.

### Wages and Benefits

- Neither the facility nor any third party must have access to, or control of, migrant associates' bank accounts, except to directly deposit wages or compensation payments per the written contract of employment. Wages must be paid in full, including overtime at the legally applicable rate. The associate must be provided with clear, legible and accurate payslips in a language they can understand.
- The facility must not impose forced savings schemes, i.e., withholding of wages until the associate's contract is finished, providing the associate a small allowance for personal expenses, or have wages paid into a bank or postal account which the associate cannot access.
- The facility must not deduct wages for work equipment, including uniforms, and basic needs such as water and first aid. Deductions for accommodations and food must only be made with the express consent of the associate and at a fair rate as allowed by law or stated in the associate's contract, whichever is lower.
- Migrant associates are eligible for all paid leaves, i.e., annual leave, sick leave, etc. per local laws. If local labor law does not specify the annual leave entitlement, then migrant associates must receive the same annual leave benefit as local associates. Associates must not be forced by threat (e.g. of dismissal) to work more overtime than is allowed under national law (i.e., excessive overtime).

### Identity Documents

- Associates must not be required to deposit their original identity papers such as travel or residency permits with their employer unless expressly stated by country law. Where the employer is legally required to hold the identification documents, the employer must provide the associate with a photocopy of the documents free of charge. At the associate's request, the facility may provide safekeeping of identity documents. In this case, the facility must provide immediate access to these documents and return them upon the associate's request with no restrictions. The deposit of identity documents for safekeeping and the return of those documents must be documented and signed by the associate and the facility.
- Third party recruiters, employment agents, and labor brokers are expressly

prohibited from holding associates' identity documents. Neither these recruitment agencies nor the employer may hold other associate documents such as land titles.

### Freedom of Movement

- The facility must allow associates to move freely within their designated work areas during work hours, including being allowed access to drinking water and toilet facilities. Associates must be allowed to leave the facility during meal periods and after work hours. The supplier will not impose curfews or geographical limits on associate movement. Except where necessary for associate privacy or safety, the facility must not restrict or limit access to associate's accommodation or visitors to the associate's accommodation.
- Migrant associates must be free to return to their home country during periods of annual or personal leave without having to pay any form of deposit and be free of the threat of termination or other penalties. In those cases, where associates return home during their annual leave, the facility must keep their positions available upon their return.
- The facility may not prevent any migrant associate from contacting their country's Embassy or Consulate.

### Grievance Mechanisms

- Migrant associates must have effective access to remedy grievances, without fear of recrimination, reprisal, or dismissal. This includes internal grievance procedures regarding the labor recruiter or the employer.

**Principle 4 - Wages and Benefits:** VF recognizes that compensation packages vary by country. All VF Authorized Facilities must compensate their associates fairly by providing compensation packages comprising wages and benefits that, at the very least, comply with legally mandated minimum standards or the prevailing industry wage, whichever is higher and shall provide legally mandated benefits. Associates must be fully compensated for overtime per local law, and each associate must be provided with a clear, written accounting for each pay period.

### **P4-1C**

**Code Provision:** Determine that the facility compensates their associates fairly by



## FACILITY GUIDELINES

providing compensation packages comprising wages and benefits that, at the very least, comply with legally mandated minimum standards or the prevailing industry wage.

### ***Facility Guidelines***

- Relevant national or regional labor laws must be posted in the local language and the native language of the associates. The posted laws must cover such areas as minimum wage, overtime rates, work hours, leaves, and limits on overtime.
- Legally mandated wages, including overtime premiums, must be calculated as required by local law. When alternative calculations are used to determine total salary, the amount paid may not be less than the legally prescribed calculation of the total salary amounts. For piece rate associates, paid leave must be compensated based upon actual earnings and must not be paid out of the piece rate wages.
- If improper payments to the associate are found in the wages, including any incorrect accounting of base and overtime wages, the facility is responsible for the retroactive payments of these wages from the date of the error up to one year or the legally required period, whichever is higher.
- If payments are made to the associates in cash, bank transfer records must be maintained.
- Facilities must ensure probationary periods do not exceed the legal limits, and only one probationary period can be used unless allowed by law. During a probationary period, the facility must not pay the associates less than the lowest wage paid for a similar job, or less than the wage agreed upon in the contract, assuming it meets or exceeds the minimum wage.
- The facility must not make any deductions from the associates' wages which are not explicitly allowed by the law, or for any disciplinary reason. Additionally, the facility must ensure that deductions, where legal, are reasonable, appropriate, and voluntary when related to services such as accommodations, transportation, and food.
- Idle/downtime payments must be compensated as per legal requirement.
- A maximum non-paid tolerance of 15 minutes can be used before or after a working shift to allow time for associates clocking in and out.

### P4-2.1C

**Code Provision:** Determine that the facility provides legally mandated associate benefits and services.

#### **Facility Guidelines**

- All legally mandated benefits including social insurance contributions must be paid as required by law on time with tangible proof of subscription for the legally entitled associates.
- The facility must ensure that when legally required, appropriate insurance is available to cover any injuries, accidents, and deaths of the associates. This is relevant for all work on site and must when specified by law, include contractors, temporary, and part-time associates.
- The facility must have a procedure in place for determining all statutory severance and separation benefits which the associate is legally entitled to.
- The facility must not break the continuity of service an associate has through short time breaks between contract periods.

### P4-3M

**Code Provision:** Determine that the facility compensates for overtime hours in accordance with local law.

#### **Facility Guidelines**

- Associates must be fully compensated for overtime worked per local law.

### P4-4M

**Code Provision:** Determine that the facility provides each associate with a clear written accounting of their payroll earned for each pay period.

#### **Facility Guidelines**

- Associates must regularly receive a written pay slip, in an understandable format, in the local language when the payroll is distributed. A translation key must be provided for those associates not able to read the local language. The payslip must include at a minimum the following information:

## FACILITY GUIDELINES

- Pay period and wage payment dates
- All regular and overtime hours worked
- Wage rates for hours of work
- Totals for regular and overtime compensation
- All additional compensation such as individual/team bonuses
- All deductions for insurance and other legally mandated benefits
- The facility must be able to explain all payments and deduction items clearly, and the associate must have the same level of understanding.
- Holiday pay, overtime payments, and any related additional compensation must be identified separately for piece rate and outsourced associates.

### P4-5C

**Code Provision:** Determine that the facility does not utilize home employment for VF production.

#### ***Facility Guidelines***

- The facility must not use any form of home working arrangement to produce VF product. If the facility has home working activities with other customers, the facility must establish and demonstrate a system to ensure VF production is not intentionally or unintentionally home worked.

### P4-6C

**Code Provision:** Determine if the frequency, timing, and form of payroll meet or exceed legal requirements.

#### ***Facility Guidelines***

- Payroll payments, including payments for associates who have resigned, must be made within the legal time limit.

### P4-7M

**Code Provision:** Determine if the facility produces and retains payroll records and time records to support compensation for the period required by law.

### ***Facility Guidelines***

- Payroll records are best kept on a computer payroll system linked to a clocking system (or time cards) and pay slips. Raw data, including production records, for the payroll calculations, must be maintained for at least 12 months, or the legal duration whichever is higher.
- Bank transfer records must be maintained for all wage payments.
- A facility that is paying wages through bank transfer it is recommended to pay all final termination settlements through bank transfers into the associate's account.

### **P4-8M**

**Code Provision:** Determine if the facility provides rest and meal breaks as required by law.

### ***Facility Guidelines***

- The facility must provide rest and meal breaks as required by law. For countries with no legally required breaks, a 30-minute unpaid break must be provided during an 8-hour workday.

### **P4-9.1M**

**Code Provision:** Determine if temporary, outsourced, or seasonal associates are utilized by the facility and are compensated in a legal and timely manner.

### ***Facility Guidelines***

- Use of temporary, outsourced, or seasonal associates must comply with the legal requirements for the relevant industries and conditions:
  - Temporary, outsourced, or seasonal associates utilized by the facility must be compensated timely as legally required for the position and location the work is conducted.
  - Copies of all records relating to temporary, outsourced, or seasonal associates including labor contracts, personnel files, social insurance, payroll, in/out time records, government permits, etc. must be maintained in the facility office.

**Principle 5 - Hours of Work:** VF Authorized Facilities must ensure associates' hours worked shall not, on a regularly scheduled basis, exceed the lesser of (a) the legal limitations on regular and overtime hours in the jurisdiction in which they manufacture or (b) 60 hours per week including overtime (except in extraordinary business circumstances). Associates must be informed at the time of hiring if mandatory overtime is a condition of employment. All associates will be entitled to at least one day off in every seven-day period.

### P5-1M

**Code Provision:** Determine if the facility ensures that associate hours worked do not, on a regularly scheduled basis, exceed the lesser of (a) the legal limitations on regular and overtime hours in the jurisdiction in which they manufacture or (b) 60 hours per week including overtime taking into consideration periods of extraordinary business circumstances.

#### ***Facility Guidelines***

- The facility must ensure that associate hours worked do not exceed 60 hours per week including overtime, or greater than the legal limit.
- All overtime must be voluntary. The facility must have an internal policy that states associates are free to decline over time. Associates must also be given adequate notice of future planned overtime work.
- If the facility provides transportation to the associates, it must be available at the end of the regular workday or shift so that associates who choose not to perform overtime can leave the facility.
- All hourly and production associates must use a time clock, swipe card, biometric scanner, or another reliable mechanical device, to record their start and stop times. If manual time records are used, the associates must approve/initial the time cards. The associates themselves must do the process of punching in and out. The facility must also provide access to associates' attendance records upon request.

### P5-2M

**Code Provision:** Determine if the facility provides at least one day off out of every seven days.

### ***Facility Guidelines***

- All associates must be provided at least one day off in every seven-day period.
- A day of rest exchange for a holiday, election, government-mandated power outage, or strike is allowed within one week of the holiday, election, government-mandated power outage, or strike. Under no circumstances must a day of rest exchange result in associates working more than 13 consecutive days.
- A day of rest must consist of at least 24 consecutive hours.

### **Best Practice:**

- The day of rest should be regularly scheduled on the same day of the week so the associate can plan for that day of rest.

**Principle 6 - Freedom of Association and Collective Bargaining:** VF Authorized Facilities shall obtain and comply with current information on local and national laws and regulations regarding Freedom of Association and Collective Bargaining. No associate shall be subject to harassment, intimidation or retaliation in their efforts to freely associate or bargain collectively.

### **P6-1Mi**

**Code Provision:** Determine if the facility has and communicates information on local and national laws and regulations regarding Freedom of Association and Collective Bargaining.

### ***Facility Guidelines***

- The facility must maintain current information on local and national laws and regulations regarding Freedom of Association and Collective Bargaining. This Freedom of Association material must be shared with management and supervision. The facility management and supervisors must respect the associate's right to freely associate, or to choose not to associate, and any associated rights related to collective bargaining.
- The facility must be open and cooperative towards associate representation, allow associates to form or join trade unions of their choosing, and to bargain collectively. The company must also give associates' representatives

## FACILITY GUIDELINES

reasonable access to the facility so they can conduct their representative functions. In countries where the law restricts freedom of association and collective bargaining, the facility must enable associates to establish substitute arrangements of associates' representation and negotiation.

- When associates' unions are in place, there must be processes to recognize the formation of associate unions and address associate grievances:
  - Where legally required, a current list of recognized union members and representatives must be maintained and be available for review.
  - Records of meetings, including minutes and agenda, with the union committee, must be retained and be available for review.
- The facility must not deduct union membership dues, fees, or fines from the associates' wages without the written consent of the individual associate unless this was freely negotiated in a valid collective bargaining agreement or when legally required.

### P6-2M

**Code Provision:** Determine if associates have been subject to harassment, intimidation or retaliation in their efforts to freely associate or bargain collectively.

#### **Facility Guidelines**

- The facility must not subject associates to harassment, intimidation or retaliation in their efforts to freely associate, join a trade union, participate in trade union activities, strike, or bargain collectively. Additionally, the associate representatives must be provided with regular access to company management to address grievances and other issues. The facility must not forbid union representatives from interacting with associates.
- All collective bargaining between the associates and facility management must be negotiated in good faith. When a collective bargaining agreement exists, both associates and company management must obey all contractual requirements.

### P6-3Mi

**Code Provision:** Determine if the facility has a mechanism in place to receive and respond timely to associate grievances.

### ***Facility Guidelines***

- The facility must have processes in place to address associate grievances (suggestion box, open door policy, communications committee, etc.). This grievance mechanism must be accessible, predictable, reasonable, transparent, confidential, and based on engagement and dialogue.
- A resolution history of associate complaints and strikes must be maintained and be available for review.

**Principle 7 - Health and Safety:** VF Authorized Facilities must provide their associates with a clean, safe and healthy work environment, designed to prevent accidents and injury to health arising out of or occurring during the course of work. All VF Authorized Facilities are required to comply with all applicable, legally mandated standards for workplace health and safety in the countries and communities in which they operate.

### **P7-1M**

***Code Provision:*** Confirm the facility has an effective written and posted Health and Safety program that complies with all health/building/electrical/fire safety requirements, has a Health & Safety Committee that includes facility associates and management, which conducts regular meetings, keeps meeting minutes, and is in accordance with local law.

### ***Facility Guidelines***

- The facility's health and safety program must include policies and procedures, associate awareness training, safety meetings, accident reviews, injury and illness prevention, risk assessments, and a comprehensive review of occupational health standards by job type (noise, air, light, and ergonomics).
- The facility must have a Health & Safety Committee that includes a ratio of facility associates and management based on country law. The Health & Safety committee membership or organization chart must be posted prominently in appropriate areas of the workplace.
- Medical checkups must be provided to associates as required by law.



### Best practice:

- Recommend using the 50/50 associate/management ratio rule when forming Health and Safety committee representation.
- For ease of recognition, identify committee or brigade members on the production floor.

### P7-2M

**Code Provision:** Determine if facility personnel have been trained on health and safety issues.

### *Facility Guidelines*

- The facility must have adequate health and safety training programs for their building configuration and production processes. Facility personnel must be trained on health and safety issues.
- Formal First Aid training is required for 1% of the facility personnel for all working shifts. (both male and female) Training and certification through an agency such as the Red Cross must be obtained, and refresher courses repeated at recommended intervals.

### P7-3M

**Code Provision:** Confirm that the facility has first aid supplies available, that are easily accessible, and are maintained as recommended by a local medical provider, or as required by law, and for regular inspection.

### *Facility Guidelines*

- There must be at least one easily accessible, fully stocked First Aid kit per 100 associates on each production floor. If kits are locked to prevent theft, the keys must be readily available.
- Each first aid kit must contain at a minimum the following or with contents per local law:
  - Sterile gauze or cotton balls
  - Bandages
  - Adhesive tape (plasters)

## FACILITY GUIDELINES

- Disinfecting agent (antiseptic cleanser)
  - Antibiotic/antibacterial ointment
  - Sterile/surgical gloves (non-latex)
  - Scissors (optional)
  - Tweezers (optional)
  - Thermometer (optional)
  - Burn ointment (optional)
- An inventory checklist must be posted inside or outside the kit. The kit must be inspected monthly with records maintained. All items must be labeled, identified, and be maintained in accordance with expiration dates.
  - First aid responders must be identified on the cover of the first aid kit.
  - Any medical staff (Doctor/Nurse) must have an appropriate and current license.
  - If additional First Aid equipment is available in the facility such as Automatic External Defibrillators (AED), the equipment must be maintained as recommended by the manufacturer. Additionally, the training requirements for the equipment must be current.

### P7-4M

**Code Provision:** Determine if there are contingency plans for dealing with serious injuries, including accident investigation procedures.

#### **Facility Guidelines**

- The facility must maintain a written injury and accident investigation procedure along with records of accident investigations.
- A health clinic must be provided per the local legal requirement. The health clinic must afford the associates adequate privacy for medical procedures or to discuss confidential medical issues.
- The facility management must be knowledgeable of where the nearest medical clinic is located and have a procedure in place for safely transporting associates in an emergency. This process must cover all working shifts.

## FACILITY GUIDELINES

Emergency telephone numbers must be prominently located by each telephone.

### P7-5M

**Code Provision:** Determine if lockout/tag out programs are adequate to protect the associates and comply with applicable legal standards.

#### **Facility Guidelines**

- Lockout/tag out procedures must safeguard associates from the unexpected energizing or startup of machinery and equipment or the release of hazardous energy during service or maintenance activities.
- Procedures for lockout/tag out must meet legal requirements. In the absence of legal requirements, the facility must ensure that their lockout/tag out procedures are adequate to protect their associates.

### P7-6M

**Code Provision:** Determine if the facility has hazardous materials communication procedures and an effective chemical safety program.

#### **Facility Guidelines**

- There must be a written chemical safety program, including a chemical inventory list in the facility. As part of this safety program, associates who handle chemicals must be trained in their proper handling, storage, and spill cleanup.
- The Safety Data Sheets (SDS), which are organized, of any potentially hazardous chemicals used in the facility, must be up-to-date and posted in the areas where the chemicals (corrosive or injurious) are used, and a copy must be kept on file in the chemical storage area.
- All chemicals must be stored in a safe, contained, well-ventilated area, where combustible and flammable chemicals are separated from oxidizing chemicals, reactive chemicals, and electrical hazards. Warning signs must be posted in areas where chemicals are present.
- Explosion proof lights and non-sparking switches must be used as required in chemical storage and usage areas.

## FACILITY GUIDELINES

- Secondary containment of hazardous chemicals must be utilized in the facility. The size of the containment must be as follows:
  - For a single container, the size of secondary containment must be 110% of the container.
  - For multiple containers, the size of the secondary containment must be 10% of the total volume of all the containers or 110% of a single container - whichever is greater.
  - The secondary containment must not have any cracks or leaks; all drainage valves must be maintained in closed position.
- An appropriate spill control kit must be accessible.
- All chemicals must be clearly labeled with hazard communication detail per SDS safety information in an understandable format for local associates.
- Spray or spot cleaning operations must be properly vented in accordance with SDS requirements. All recommended PPE must be available at the spot cleaning station.
- An Emergency shower and eyewash station must be provided in an area that requires no more than 10 seconds to reach from areas of chemical (corrosive or injurious) storage, chemical usage, and battery charging. The eyewash station must meet the following requirements:
  - Water must be potable
  - The velocity of water such that no injury can occur
  - Both eyes can be washed at the same time
  - Minimum flow rate: 1.5 L for a minimum of 15 minutes
  - No sharp projections
  - Nozzles maintained with covers to prevent airborne contamination
  - Accessible and identifiable with a highly visible sign
  - Water temperature in units must be maintained between 15 and 35 C (60 to 90° F)

## FACILITY GUIDELINES

- Plumbed eyewash units must be activated weekly to clean the line and verify proper operation. Self-contained eyewash units must be visually inspected weekly and maintained per the manufacturers' specifications. Documentation must be maintained on-site for all eyewash inspections and maintenance.

### Best Practice:

- Chemical compatibility standards should be posted and observed along with PPE requirements.
- Recommend a periodic review of SDS for PPE requirements and hazard communication information.

### P7-7M

**Code Provision:** Determine if the facility has emergency evacuation diagrams in the native language(s) of the associates posted in conspicuous locations in the facility.

#### **Facility Guidelines**

- Emergency evacuation route maps must be posted in prominent areas of the facility floor, be up-to-date with the current facility layout, and correspond with the designated exit routes. The map must be drawn from the viewer's perspective and have a "you are here" locator noted.
- Maps and evacuation instructions must be written in the local language, with translations for non-local associates, and with instructions for fire, earthquakes, bomb threats, strong storms, etc.

### P7-8C

**Code Provision:** Determine if an emergency/evacuation alarm is installed and can be heard in all areas of the facility.

#### **Facility Guidelines**

- An audible alarm system must be in place. In areas of high noise levels (above 90 decibels) or where hearing impaired associates are present, a visible alarm system must be in place in the applicable areas.
- Individual alarm switches must be integrated throughout the entire building, be clearly marked, and maintained unobstructed.

## FACILITY GUIDELINES

- The fire alarm must be audible throughout the facility and must have a sound distinct from other notice systems.
- All alarm devices must be tested regularly by qualified personnel at least twice annually. Testing must be conducted in conjunction with evacuation drills. Testing records must be maintained.
- The alarm system must have a backup power source, or there must be a secondary alarm system.
- All new personnel must be trained as to the functioning of the fire alarm system before beginning work.
- For facilities without sprinkler systems; in low traffic areas, smoke detectors must be mounted to the ceiling and located every 30'/9m. If detectors are wall or column mounted they must be within 12"/30cm from the ceiling. For battery-operated alarms, the battery must be changed annually, with the date noted in a log.

### Best practice:

- It is recommended that smoke alarms and detectors be linked to a central alarm panel.

### P7-9M

**Code Provision:** Determine if the facility conducts fire/emergency evacuation drills at least every six months or legal standard whichever is higher. Also, note if there are records indicating date and details of such drills.

### Facility Guidelines

- Fire/emergency drills (the practicing of an emergency evacuation procedures) must be conducted facility-wide, for all shifts, at least every six months, or as required by law, whichever frequency is higher. Drills must be documented with date, shift information, evacuation time, photos, and any legal requirements.

### P7-10C

**Code Provision:** Determine if the facility has an adequate number of properly located and clearly marked emergency exits available. Confirm that the exits are accessible and unlocked during working hours. Confirm that, the emergency exit doors have panic

hardware or lever style (one hand - one motion door openers).

### ***Facility Guidelines***

- There must be a minimum of 2 exits on opposite sides of the floor where up to 500 associates are stationed. There must be a minimum of 3 exits located on opposite sides of the floor where 500 or more associates are stationed.
- If the number of associates, the size of the building, its occupancy, or the arrangement of the workplace allows all associates to evacuate safely during an emergency, one exit route is permitted.
- Exits must be at least 28"/71cm wide if there are fewer than 60 associates in an area. Exits must be at least 36"/90cm wide if there are more than 60 associates in an area.
- Emergency exits must be maintained unlocked or have panic bars if the door is secured to prevent access from the outside. Emergency exits must be unblocked by materials and debris, and be readily accessible while the building is occupied.
- Secondary exits must also ensure safe and rapid evacuation and be constructed as per legal requirements.
- Side hinged exit doors must swing in the direction of the flow of exiting traffic.
- Roll-up doors marked as exits must be kept unlocked and open during working hours. The facility may lower these doors during non-working breaks, but they must remain unlocked. The electrical roll doors must have a secondary manual option to open the door in the event of power loss.
- Sliding doors marked as exits must be kept unlocked and open during working hours if they are primary exits. If they are secondary exits, they must remain unlocked and unblocked.
- All exits must lead to a safe assembly point a safe distance from the facility
- Exits must be marked by illuminated or reflective signs visible 100'/30m away. Signs must have the word "Exit" (in the local language) in plain legible letters not less than 6"/15cm high and not less than ¾"/2cm wide or conform to the country standards.

## FACILITY GUIDELINES

- For facilities with security mesh on outside windows, the local fire department must be consulted to determine how much accessibility is required for fire department rescue efforts. Windows identified as 'emergency exits' in the emergency evacuation plan must be continuously kept clear.
- Emergency windows must have a landing on the outside, such as an external fire escape. The landing must be at least 3'/1m in width before stepping down.

### P7-11M

**Code Provision:** Determine if aisles are kept clear from obstructions at all times.

#### **Facility Guidelines**

- Primary exit aisles must be at least 28"/71cm wide, unobstructed, and marked with two lines of contrasting color to indicate the areas which must be kept clear. Objects that project into the exit aisles must not reduce the width of the exit route to less than the 28"/71cm.
- Static work storage, tripping hazards, and other obstructions must not restrict access to primary aisles.
- Combustible items must not be stored under stairwells.

#### **Best practice:**

- Exit routes should include directional arrows. Floor arrows should be fluorescent or luminescent.

### P7-12M

**Code Provision:** Determine if exits are properly illuminated with emergency lights and that they are functioning throughout the facility, including stairwells, aisles, and hallways.

#### **Facility Guidelines**

- Emergency lighting must be in place throughout the facility with initial illumination of not less than one foot-candle (10.8-lux) for aisles and exits, including halls and stairwells. Emergency lighting must be provided automatically in the event of a power failure. The emergency lighting must



last for at least 90 minutes when activated. Any emergency illumination must be configured so the failure of any single lighting unit, such as the burning out of an electric bulb, will not leave any area in darkness.

- The facility must test all emergency lighting monthly and keep maintenance and testing records available for review.

### P7-13M

**Code Provision:** Determine if the facility has fire permits and adequate firefighting equipment installed based on local requirements or VF guidelines, whichever is higher. Determine if the facility has the appropriate number and class of fire extinguishers installed without obstruction. Extinguishers must be inspected monthly and noted with inspection date on the hang tags.

#### **Facility Guidelines**

- A fire extinguisher must be within 75'/23m of each associate or as required by law (class A, C, D, & ABC use). Class B use extinguishers must be within 50'/15m.
- Extinguishers must be positioned as required by law. Highly visible paint must indicate the location of the extinguisher; fire extinguisher signage must be in the local language. The extinguisher location must be visible from throughout the immediate working area. Access to the extinguishers must be maintained unobstructed.
- Extinguishers must be an appropriate class for the workplace.
  - **Class A:** For fires involving ordinary combustible materials such as paper, wood, cloth, and some rubber and plastic materials.
  - **Class B:** For fires involving flammable or combustible liquids, flammable gases, greases, and similar materials, and some rubber and plastic materials.
  - **Class C:** For fires involving energized electrical equipment where safety to the associate requires the use of electrically nonconductive extinguishing material.
  - **Class D:** For fires involving combustible metals such as magnesium, titanium, zirconium, sodium, lithium, and potassium.

## FACILITY GUIDELINES

- **Class ABC** for three different kinds of fires: Class A (ordinary combustibles such as wood or paper), Class B (flammable liquid fires such as grease or gasoline) or Class C (electrical fires)
- Fire extinguishers must be inspected monthly, serviced annually, and hydrostatically tested as required by law - or at minimum every five years, with the date of inspections indicated on attached tags.
- 10% of the workforce must be trained in the use of an extinguisher through demonstration or the distribution of instructional pamphlets. This training must be properly documented.
- Where in place, standpipe and hose systems must be approved by the local fire department jurisdiction. Minimum pressure requirements must meet current National Fire Protection Association (NFPA) requirements for an appropriately installed fire hose suppression system. Access to the standpipe and hose systems must be maintained unobstructed.
- Fire hoses must be equipped with a shutoff type nozzle. All hoses must be inspected at least annually and replaced per manufacturer guidelines. The inspection records are to be kept on file. The fire pump must be tested and inspected annually by a qualified technician; the inspection records must be kept on file.
- Training on the use of the fire hose system must be conducted annually and documented.
- The gate valve for the fire suppression pump must be locked in the open position with a chain to prevent tampering or be secured in a locked pump room with limited access.

### **Best practice:**

- It is recommended to utilize ABC (multi-use) extinguishers as appropriate.

### **P7-14Mi**

**Code Provision:** Determine if the working space allocated to each associate is adequate for the safe performance of production activities, emergency evacuation and access to safety equipment

### ***Facility Guidelines***

- Each workstation must be located within 200'/60m of an exit or per the local standards.
- The facility floor must be maintained clean, dry and in a good state of repair. Any broken tiles, holes, or protruding objects must be repaired promptly.
- A minimum of 3'/1m of clearance must be provided for all electrical panels, eyewash/shower stations, and emergency equipment.
- Any spills must be cleaned immediately and waste disposed of properly.

### **P7-15M**

**Code Provision:** Determine if machinery is equipped with the appropriate operational safety devices.

### ***Facility Guidelines***

- Machinery must be equipped with safety devices, which associates cannot manipulate such as needle and belt guards for sewing machines, two-hand operation for die cutting/hole punching/pressing equipment, and automatic shut off switches for laundry extractors, etc. All guards must be in working condition and securely in place.
- The facility must conduct regular inspections on all machine guarding and maintain machinery maintenance and inspection records.
- If compressed air is used in the facility, a safety nozzle must be used on the air guns.
- Fans and other rotating equipment located less than 7'/2m above the working surface must be equipped with protective guards.
- Drill presses and other large mechanical equipment must be secured to the floor or workspace to prevent tipping.
- All associates working with machinery must have safety training before they can operate the machinery. This training must include:
  - Machine hazards
  - Safe operating procedures

## FACILITY GUIDELINES

- Information on the machine's guards and their proper use
- Notification procedures if guarding is missing, damaged, inoperable, or another unsafe condition exists.

### P7-16M

**Code Provision:** Determine if associates need to wear any personal protective equipment (PPE) and if so, confirm the employer provides it at no cost to the associate.

#### **Facility Guidelines**

- Personal protective equipment (PPE) assessments must be conducted for each operation and associates must be trained in the use of required PPE for their operations. All training must be provided in the native language of the associates, competency of the material reviewed must be ensured, and training must be documented. The facility must enforce the use of PPE as needed.
- For associates using chemicals, the SDS requirements for PPE must be followed. All PPE that is utilized by the associate must meet the minimum manufacturer recommendations and/or the acceptable industry standard for the task performed.
- PPE may include eye protection, hearing protection, dust masks, filtered masks, gloves, protective apparel, etc.
- Mesh gloves must be utilized when fabric cutting knives are used.
- Appropriate footwear must be worn for jobs involving electrical system maintenance, heavy machinery, or when handling chemicals.
- Ergonomic mats must be provided for associates who are stationary in a standing position for more than four hours daily. Additional ergonomic accommodations must be implemented when a job task is repetitive in nature. Repetitive operations may lead to soft tissue injury or other injuries.
- Any required medical testing of the associates related to the effectiveness of PPE shall be paid for by the employer; this may include fit testing for the use of respirators.
- Information must be posted in work areas instructing associates in the use of required PPE for the area or task, as well as warnings as to the potential

health and safety risks of not using such equipment.

### P7-17C

**Code Provision:** Determine that the workplace is free of electrical hazards.

#### **Facility Guidelines**

- Electrical panel boxes, conduits, and feed rails must be maintained free of dust and lint.
- Electrical panel boxes must not be used to store any items.
- All wires must be free of splices and repairs using tape. Electrical cords on machines that are taped, cut, or spliced must be replaced.
- All electrical cords must be continuous in length. Extension cords must be used only for temporary electrical needs and not exceed more than 30 days in use. “Daisy chain” (the practice of connecting multiple extension cords or outlet strips) is not allowed.
- All electrical equipment must be grounded. Grounding wiring and earth pole must be tested periodically by a qualified electrician. Any equipment plug manufactured with a ground prong must not be replaced to avoid the use of the ground prong.
- Each machine must have its own plug/socket/cord. The use of one plug/socket/cord for multiple devices must be avoided.
- The facility must ensure that electrical panels are not overloaded. Infrared thermographic inspection of electrical boxes must be conducted annually when legally required.
- Electrical boxes must not have open fuse/breaker spaces. Any open fuse/breaker spacer must be covered by an approved electrical spacer. Electrical box interior wiring must be insulated from associate exposure.
- Electrical boxes must be maintained unobstructed. 3’/1m cleared space around a box is recommended.
- Electrical breakers and wires must not be installed on flammable materials or directly on the wall.
- Electrical panels and circuit breakers must be properly labeled in a language

the associates understand. High voltage labeling must be in place when 480 or more volts are present.

- All electrical cables greater than 50 volts must be inside conduit. Conduits must be securely connected to machinery, fuse boxes, electrical sockets, plugs, etc. Electrical insulation must cover individual wires.
- Only properly trained and licensed technicians must repair wiring or electrical machinery.
- Appropriate signage must be in place to warn of restricted access to electrical panels.
- Ground Fault Circuit Interrupters (GFCI), Ground Fault Interrupters (GFI), or Residual Current Devices (RCD) must be installed in wet or damp locations.
- Transformers must be free of obstructions and positioned away from flammable materials. Access to transformers must be maintained locked, be restricted to authorized personnel, and with the appropriate signage. If transformers with exposed terminals are installed on the roof, ensure that they are not within 50'/15m of a metal roof structure to prevent arc flash .

### **Best Practices:**

- Installing approved switchboard rubber mats below each fuse box, and main electrical panels may minimize the potential for electrical shock.

### **P7-18M**

**Code Provision:** Determine if the workplace is free of mechanical hazards from large equipment.

### ***Facility Guidelines***

#### Boilers and Compressors

- Closed pressure vessels, including boilers and industrial compressors, must have maintenance conducted at least annually, with records of maintenance maintained. Operating permits for any closed pressure vessel must be maintained as required by local law.
- Blow off pipes on boilers must evacuate outside of the boiler room and be directed away from potential contact with people.

## FACILITY GUIDELINES

- Ensure that the boiler, based on its size and weight, and local law, is housed at the required distance from the production area, within a partitioned area or room that meets legal building requirements, or outside of the production building.
- A daily checklist must be used to monitor boiler operation.
- At least one qualified boiler operator must be present at all hours the boiler is operating.
- The boiler must be in an identified restricted area.

### Elevators and Lifts

- Elevator and lift permits, as legally required, must be up-to-date.
- All elevators and lifts must be inspected annually for safe operation by a qualified technician; inspection records must be maintained on-site and be available for review.
- The elevator shaft doors must be closed when the elevator is not in use. The elevators must have safety devices to prevent the car from moving when the gates or doors are open.
- There must be a sign posted near the elevator doors on each floor that indicates to use the stairs in the event of a fire.
- Only authorized personnel must operate cargo elevators. Elevator load limits must be posted in the local language of the associates.

### Forklifts

- Forklifts must be maintained for safe operation. All forklifts must have the required manufacturer safety equipment installed; safety equipment must be operational including horn, brakes, headlights, backup lights, backup alarm, and running strobe light. A maintenance checklist must be completed daily and reviewed by mechanical staff. Supervisors must review the maintenance checklist weekly. All needed repairs for broken lift equipment must be addressed immediately.
- Forklift drivers must be licensed/certified to drive a forklift by a qualified trainer before operation and refresher training must be completed at least

## FACILITY GUIDELINES

annually. All training must ensure competency of the material and be documented; training must be provided in the native language of the associates.

- All accessory equipment used in the operation of the forklift, such as fall protection devices and harnesses, must be worn and fitted correctly by the associates. Such equipment must be replaced per the manufacturer's recommendations.
- Keys must not be left in an unattended forklift; other measures must be taken to prevent unauthorized use if the key cannot be removed from the forklift.

### Lasers

- For facilities with lasers (a device which produces a powerful narrow beam of light that differs from ordinary light in that it is monochromatic (one color), organized, and directional) the facility must implement procedures to reduce or eliminate the risk of occupational exposure to lasers, which must cover the following:
  - Equipment must be designed with guarding and interlocks to prevent exposure to the laser beam
  - Restrict laser area to authorized personnel only, have signage and postings in laser areas, and use appropriate personal protective equipment (PPE).

### **Best Practice:**

- Anti-restart devices should be used on machines that require a motor starter such as mechanical power presses and woodworking machines.

### **P7-19M**

**Code Provision:** Determine if potable water is provided with individual drinking containers and its use is not restricted.

### **Facility Guidelines**

- Fresh potable water must be available for associates without restriction or cost. Where multiple sources of water exist, potable water must be clearly identified. The use of a common drinking cup is prohibited.



## FACILITY GUIDELINES

- Potable water must be provided for cooking, washing of foods, and washing of cooking and eating utensils.
- All water filters that are attached to drinking fountains or water dispensers must be maintained and replaced per the manufacturer's guidelines.
- Well or municipal water must be independently tested for bacteria as well as chemical, mineral, metal, or other contaminants every six months, or as required by law, and records must be maintained. Bottled water providers must provide water test results every six months, or as required by law.

### P7-20M

**Code Provision:** Determine if the facility is well ventilated and adequately heated/cooled.

#### **Facility Guidelines**

- Facilities must maintain their air temperature of between:

Avoid	< 50° F	< 10° C
Borderline	50° - 60° F	10° - 15° C
Ideal	60° - 86° F	15° - 30° C
Borderline	86° - 95° F	30° - 35° C
Avoid	> 95° F	> 35° C

- In unusually hot countries, the temperature must be maintained at a reasonable level for the area.
- Air in all production areas must be adequately circulated and be fresh and free of fumes, dust, odors, and fibers. The facility must maintain proper ventilation on the facility floor and follow the SDS guidelines on ventilation where chemicals are used.
- Management must take measures to ensure that the temperature in the workplace is always at a tolerable level. This temperature must be at a level which is reasonable considering the health of the associates and must such as to restrict their work. This temperature must be measured by a thermometer which is located on the production floor.
- If reasonable temperature ranges cannot be maintained, heat/cold stress procedures must be implemented including engineering, administrative

## FACILITY GUIDELINES

controls and personal protective equipment to minimize the effects of the temperature.

- In facilities where down filling processes are present, automated machinery must be used along with appropriate PPE.
- Apparel sandblasting machinery is not permitted. Machinery must be removed from the facility.

### P7-21Mi

**Code Provision:** Determine that the work surface lighting in the production areas is sufficient for safe, efficient, and quality work.

#### **Facility Guidelines**

- Lighting guidelines (VF recommendation):

Emergency egress	100 lux	10 fc
Production area	750 lux	70 fc
Inspection area	1000 lux	100 fc
Warehouse	100-500 lux	10-50 fc
Offices	750 lux	70 fc
Corridor/Stairs	200 lux	20 fc

### P7-22M

**Code Provision:** Determine if the noise levels in the facility are within acceptable limits.

#### **Facility Guidelines**

##### **Sound Level Guidelines**

85 - 90 decibels	Hearing protection recommended
90 - 95 decibels	Hearing protection required
> 95 decibels	Hearing protection required and noise reduction action taken

- A hearing conservation program must be implemented where associates are exposed to a time-weighted average noise level of 85 dB or higher over an 8-hour work shift. The hearing conservation program requires facilities to:
  - Conduct ongoing measurements of noise levels.

## FACILITY GUIDELINES

- Provide free annual hearing exams.
  - Provide free hearing protection.
  - Provide training to include effects of noise on hearing, the purpose of hearing protection, and instructions on the selection, fitting, use, and care of hearing protection.
  - Conduct ongoing evaluations of the adequacy of the hearing protectors in use.
- For areas with noise levels over 95 dB, engineering controls that reduce sound exposure levels must be implemented such as:
    - Low-noise tools and machinery.
    - Maintain and lubricate machinery and equipment (e.g., oil bearings).
    - Place a barrier between the noise source and associate (e.g., sound walls or curtains).
    - Enclose or isolate the noise source.
    - Operate noisy machines during shifts when fewer people are exposed.
    - Limit the amount of time a person spends at a noise source.

### P7-23M

**Code Provision:** Determine if clean and sanitary toilet areas are available in sufficient quantity.

#### **Facility Guidelines**

- Toilets:
  - Separate facilities for men and women (clearly marked).
  - 1-15 persons - 1 toilet minimum
  - 16-35 persons - 2 toilets minimum
  - 36-55 persons - 3 toilets minimum

## FACILITY GUIDELINES

- 56-80 persons - 4 toilets minimum
  - 81-110 persons - 5 toilets minimum
  - 111-150 persons - 6 + 1 additional toilets minimum for every additional 40 persons.
- Toilets must be clean, always accessible, and functional. A cleaning log must be maintained indicating at least twice daily cleaning.
  - All trash bins, used within the toilet stalls, must be covered.
  - Associates must be permitted to use sex-segregated facilities that correspond to their gender identity within regulations of local or national nondiscrimination laws.
  - Toilets must provide appropriate privacy as well as running water, liquid/powder soap, cleansing water (or toilet paper), and individual hand drying capabilities or disposable paper towels dispensers. There must be adequate light and ventilation in these areas and enclosed drainage pipes in all toilet facilities.
  - Associates must have access to a personal storage locker or other space that is secured for storage; the number of available lockers must correspond to the total workforce.
  - Any showering/locker room area must be maintained clean, with privacy, with adequate hot/cold water pressure.

### P7-24M

**Code Provision:** Determine, if applicable, that clean and sanitary canteen/dining facilities are provided.

#### **Facility Guidelines**

- Canteen related operating permits must be obtained before food service operations begin. Once received, the food service permits must be kept current.
- Foodservice associates must undergo a medical examination and be certified as free from communicable diseases at least annually or as required by local law, whichever is more frequent. Additionally, the associates must understand and follow procedures for reducing the transmission of

## FACILITY GUIDELINES

communicable disease; they must wear hairnets, gloves, and aprons while preparing and serving food, and must thoroughly wash/dry and disinfect hands before contacting food.

- Tables, dishes, and utensils must be sanitized between uses. Food must be properly stored, handling practices must be sanitary, and no food left uncovered or stored in the open.
- Refrigerated food must be kept under 40°F/4°C, hot food for serving must be maintained at or above 140°F/60°C.
- Compressed gas cylinders, utilized for food preparation, must be stored outside, be secured upright, and have proper signage. Leakage indicators must be installed. Gas valves must be turned off when not in use; emergency gas shut off valves must be readily accessible and identified with signage.
- There must be adequate seating for the number of associates that need to use the cafeteria at the same time.
- Floors and surfaces must be maintained clean and free of cracks and broken tiles.
- Control of insects must be maintained through fumigation or with insect traps. Records must be maintained for any service provider utilized for pest control management.
- The cafeteria must be protected from the weather.
- All fire safety requirements apply to the cafeteria including ensuring that a fire extinguisher is readily available in the food heating area used by the associates.

### **Best practice:**

- Recommend to keep a sampling of food for 24 hours in the event of a food poisoning investigation.

### **P7-25Mi**

**Code Provision:** Determine if trash is removed, controlled, and disposed of inside and outside of the facility and that waste disposals or containers are provided.

### ***Facility Guidelines***

- The facility and the immediate area must be clear of debris and garbage. All waste removal must be handled by an authorized, licensed company and documentation must be maintained.
- Facilities must establish a good housekeeping program to keep all areas free of lint that accumulates on walls, lamps, electrical rails, machinery, floor, and other trash.
- Receptacles must be provided to collect/remove scraps.
- Trash compactors must be kept in a safe manner with appropriate safety devices and locking mechanisms to prevent unsafe usage.
- Control of insects and rodents in the trash disposal areas must be maintained through fumigation or with insect traps; records must be maintained for any service provider utilized for pest management.

### **P7-26M**

**Code Provision:** Determine if hazardous and combustible materials are securely stored and safely disposed of.

### ***Facility Guidelines***

- The storage of chemicals and potentially hazardous materials must be in a segregated area, be clearly labeled with safety signs, and be adequately ventilated.
- Emergency spill clean-up equipment must be available along with a documented spill response plan.
- All hazardous waste must be stored in appropriate containers for disposal and labeled with the hazard information.
- Hazardous waste disposal must be handled by an authorized, licensed company and disposal documentation must be maintained.
- Flammable and combustible waste must be stored away from ignition sources.
- Incompatible hazardous wastes must be segregated.

### Best Practice:

- Chemical compatibility standards should be posted and observed along with PPE requirements.

### P7-27C

**Code Provision:** Determine whether the maintenance of the building structure appears to be adequate for safe usage.

### Facility Guidelines

- Stairs must be structurally sound and provide sufficient width for safe exiting.
  - Stairways greater than 44"/110cm width, with four or more steps, must have a secure handrail on both sides.
  - Stairwells wider than 88"/225cm must have a secure handrail on both sides along with a center handrail.
  - Stair heights/risers must be no more than 8"/20cm and step depths must be at least 10"/25cm with a non-slip surface.
- Mezzanine areas must be maintained in good condition. All mezzanines must adhere to the following guidelines:
  - The mezzanine must not have, areas open to a lower level without proper fall protection, or stairways without properly installed handrails.
  - Weight limits must be properly identified, posted and monitored regularly.
  - Guardrails and toe boards on mezzanines must be installed to prevent objects from falling.
  - Mezzanines must have sufficient ceiling height. 7'/2m
- Mezzanines must have at least two emergency egress routes in general opposite sides. A single exit is allowable if following conditions exist:
  - Less than 50 occupants
  - The common path of egress travel must be less than 100'/30m for buildings with sprinklers, and less than 75'/23m for buildings with

## FACILITY GUIDELINES

no sprinklers. The common path is the egress path down from the mezzanine to a point where multiple paths could then be taken to multiple exits.

- Cargo lifts or other means of safe material handling for stored material must be used to prevent associates from carrying excessive weight.
- Any buildings, or construction in addition to the original design, of facility establishment, must be built legally with a valid permit, approval, inspection certificates, registration or reports issued by governmental authorities.
- The facility must not have signs of visual structural distress (progressive cracking) in main load-bearing beams.
- The facility must not have visual deflections/deterioration in building structure (roof, walls, and columns).
- The facility floor must be maintained in good condition with no excessive cracks and excessive settling.
- The facility roof must be maintained in good condition without signs of serious roof deterioration and excessive or critical roof leaks.
- Storage rack beams must not be overloaded or deflecting/deteriorating under the weight. If overloading is observed, the racking must be unloaded immediately and replaced with new beams (when available) with reduced loading. The racking uprights must be anchored to the floor and have base plates. There must be lateral bracing on uprights.
- Racks of 20'/6m in height must have lateral ties to other racks or walls.
- All areas of the facility that are not at the ground level and are a potential fall risk will require caution signage to alert personnel of areas of risk. Spaces open to potential fall hazards will be marked with chains and signage or with removable fencing for fall protection.
- A facility building must not have any of the following situations:
  - Be located in densely-packed urban areas where emergency vehicles do not have accessibility.
  - Be in a multi-story building shared with other facilities /enterprises/commercial spaces under separate ownership.



## FACILITY GUIDELINES

- Be a multi-story building without an emergency alarm that is not integrated with the entire building.
  - Be a multi-story building without emergency drill exercises that are organized throughout all facilities within the same building once every six months, maintain documentation of drills.
  - Have obstructed safety egress.
  - Have stairwells without emergency lighting & signage for evacuation.
  - Be a multi-story building without at least two stairwells with a width not less than 36"/90cm taking into consideration the building's employment capacity
- Asbestos found in a facility must remain undisturbed and have a proper disposal plan as legally required.
  - Containers and trailers used for storage must not block access for fire/emergency vehicles and must be stored on stable level ground. If legally allowed, flammable or hazardous material can be stored inside of containers with appropriate outside labeling and appropriate type fire extinguishers present. Containers must not be double stacked. The loading and unloading of containers must involve at least two associates and be done from the ground level or with a proper loading dock. Containers on chassis and wheeled trailers being loaded/unloaded with forklifts must be locked in place with wheel chocks.

### **Best practice:**

- Racking uprights should have impact protection at the ends of the aisles.
- The entire facility should have a sprinkler system installed.

### **P7-28M**

**Code Provision:** Determine if the facility has a bloodborne pathogen program which complies with legal requirements and/or VF guidelines.

### **Facility Guidelines**

- The facility must have a bloodborne pathogen policy to protect associates who work in areas where they are at risk of exposure to blood or other

potentially infectious materials. Additionally, any trained first aid responder must receive bloodborne pathogen training. This must include written documents to explain the policy along with training provided on a yearly basis.

- Associates must not share potentially contaminated items including tagging guns and box cutters; these items must be marked for use by a single associate.
- The disposal of bloodborne pathogen waste must be in accordance with local or national laws.

### **Best practices:**

- Having a procedure for proper labeling and disposal of needles and sharps is recommended.

**Principle 8 – Nondiscrimination:** While VF recognizes and respects cultural differences, employment – including hiring, remuneration, benefits, advancement, termination, and retirement – must be based on ability and not on belief or any other personal characteristics. VF Authorized Facilities may not discriminate based on race, age, color, national origin, gender, religion, sexual orientation, disability, political opinion, or social or ethnic origin.

### **P8-1M**

**Code Provision:** Determine if the facility has practices in place to prevent discrimination relating to hiring, remuneration, benefits, advancement, termination, and retirement.

### **Facility Guidelines**

- The facility must have a nondiscrimination policy that respects individual differences between all associates. This policy must include non-discrimination protection for all regardless of race, age, color, national origin, gender, religion, sexual orientation, disability, political opinion, or social or ethnic origin. This policy must cover all associates including contracted associates who provide services to the facility.

## FACILITY GUIDELINES

**Principle 9 – Harassment:** VF Authorized Facilities must treat all associates with respect and dignity. VF Authorized Facilities may not subject associates to corporal punishment, physical, sexual, psychological or verbal harassment or abuse. In addition, VF Authorized Facilities may not use monetary fines as a disciplinary practice.

### **P9-1M**

**Code Provision:** Determine if the facility has practices in place to treat all associates with respect and dignity.

#### ***Facility Guidelines***

- The facility must have a non-harassment policy for treating all associates with respect and dignity. This policy must ensure that no associates are subject to corporal punishment, physical, sexual, psychological or verbal harassment or abuse. All associates including contracted associates who provide services to the facility must be trained on this policy.
- Facilities must allow free access to toilets throughout the working day. The use of toilet passes is not allowed.
- Facilities may not use monetary fines as a disciplinary practice.

**Principle 10 - Women's Rights:** VF Authorized Facilities must ensure that women associates will receive equal remuneration, including benefits, equal treatment, equal evaluation of the quality of their work, and equal opportunity to fill all positions open to male associates. Pregnancy tests will not be a condition of employment, nor will they be demanded of associates. Associates who take maternity leave (of a duration determined by local and national laws) will not face dismissal nor threat of dismissal, loss of seniority or deduction of wages, and will be able to return to their former employment at the same rate of pay and benefits. Associates will not be forced or pressured to use contraception. Associates will not be exposed to hazards, including glues and solvents, that may endanger their safety, including their reproductive health. Facilities shall provide appropriate services and accommodation to women associates in connection with pregnancy.

### **P10-1M**

**Code Provision:** Determine if the facility provides equal opportunities for women as they do for men. Determine if there are practices that interfere with women's

reproductive rights and compliance with their legal benefits covering maternity.

### ***Facility Guidelines***

- The facility must have a women rights policy which ensures that female associates receive equal remuneration including benefits, equal treatment, equal evaluation of the quality of their work, and an equal opportunity to fill all positions. All associates must be trained on this policy.
- Women’s rights within a facility must ensure:
  - Pregnancy tests will not be a condition of employment, nor will they be demanded of associates.
  - Women who take maternity leave will not face dismissal, loss of seniority or deduction of wages, and will be able to return to their former employment at the same rate of pay and benefits.
  - Women will not be exposed to hazards, including glues and solvents, which may endanger their health, including their reproductive health.
  - Associates will not be forced or pressured to use contraception.
- Facilities shall provide appropriate services and accommodations to women associates in connection with pregnancy, childbirth, and nursing as legally required.

**Best practice:** It is recommended to provide maternity leave benefits if not defined by local law.

**Principle 11 – Subcontracting:** VF Authorized Facilities will not utilize subcontractors in the manufacturing of VF products or components without VF’s written approval and only after the subcontractor has agreed to comply with the Terms of Engagement, including these Global Compliance Principles.

### **P11-1C**

**Code Provision:** Determine if the facility uses any unauthorized subcontracting or outsourcing for any VF Corporation production.

### ***Facility Guidelines***

- Subcontracting of VF work to unauthorized facilities is not allowed.

## FACILITY GUIDELINES

Subcontracting includes, but is not limited to, all cutting facilities, sewing plants, screen printers, embroiderers, laundries and packaging locations. Any subcontracting facility intended for use for VF production must be reported to VF, and a VF facility compliance audit must take place before placing any VF production. Production cannot begin until the subcontractor has received a positive audit designation.

- The facility must maintain production and shipping records including subcontracting documentation for VF production for at least 12 months or the legally required time for customs verification, whichever is higher.

**Principle 12 - Monitoring and Compliance:** VF Authorized Facilities will maintain on site all documentation necessary to demonstrate compliance with these Global Compliance Principles. VF and its subsidiaries will undertake affirmative measures, such as announced and unannounced on-site inspections of production facilities, to monitor compliance with these Global Compliance Principles. VF Authorized Facilities must allow VF representatives full access to production facilities, associate records and associates for confidential interviews in connection with monitoring visits. In addition, VF Authorized Facilities must respond promptly to reasonable inquiries by VF representatives concerning the subjects addressed in the audit.

### **P12-1C**

**Code Provision:** Determine if the facility has provided the VF Facility Compliance Auditor with open access to information and all associates for the purpose of conducting a VF Facility Compliance Audit.

### **Facility Guidelines**

- Facilities must maintain on site all documentation necessary to demonstrate compliance with the VF Global Compliance Principles; all requested records must be available upon request. A copy of temporary associates, contract associates, third-party security, canteen staff, maintenance contracts, payment records, and any other relevant audit documentation must be maintained at the facility. The facility must allow associate interviews in a confidential location and access to all areas of the facility.

**Principle 13 - Informed Workplace:** VF Authorized Facilities must inform associates about the workplace standards orally and through the posting of standards in a prominent place and undertake other efforts to educate associates about the standards on a regular basis.

### **P13-1Mi**

**Code Provision:** Determine if the facility has a process to inform associates about legal workplace standards, VF's Global Compliance Principles, and the codes of conduct for other active brands.

#### ***Facility Guidelines***

- The facility must have a process to inform associates about legal workplace standards, and VF's Global Compliance Principles.
- The personnel policies must be written and distributed to all associates in the local language as well as being posted in public areas in the facility. The facility must develop alternative training processes for illiterate associates to understand the personnel policies.
- The facility personnel policies must cover wages, benefits, deductions, vacations, leaves, regular and overtime hours, overtime rates, termination/resignation with a defined severance payment procedure, grievance procedures, harassment, and abuse.
- The facility must have a clear policy on associate discipline and established procedures for taking disciplinary action.

**Principle 14 - Associate Residence (Dormitory):** Dormitories of VF Authorized Facilities must provide a clean, safe, and healthy residence environment. The dormitory design must provide adequate privacy, security, and freedom of movement for all occupants. Dormitory facilities must comply with all applicable, legally mandated standards, for public domiciles in the countries and communities in which they are located.

### **P14-1C**

**Code Provision:** Determine if the dormitories are in a clean, safe, and healthy environment.

### *Facility Guidelines*

- Dormitory facilities must not be used for production, warehousing or chemical storage.
- Dormitories must be in separate structures, located at least the required distance per local law from chemical and production related buildings. In the absence of zoning laws, buildings should be at such a distance to allow adequate space for firefighting equipment and an orderly evacuation.
- The Health and Safety guidelines for production facilities must be applied to dormitories as well. Some additional recommendations for dormitories are as follows:
  - Dormitories must be clean, secure, adequately lit, sufficiently heated/cooled, and have good ventilation.
  - At a minimum, each associate in the dormitory must have 50ft<sup>2</sup>/4.6m<sup>2</sup> of living space or the amount required by local law, whichever is higher.
  - Restrictions on dormitory residents (curfews) must be judged to be reasonable in the context of legitimate concerns for personal safety. All associates, including contract associates, must be allowed to leave the dormitories at will, except in those cases where there is reasonable concern for their safety, in which case the facility must provide transportation to the associate's desired destination.
  - For dorms built with one central staircase, there need to be three exits per floor – one central plus one additional at opposite ends of the building.
  - An emergency evacuation diagram must be placed on each floor along with instructions for fire, severe weather, earthquakes, etc. (as appropriate for the location).
  - There must be smoke detectors mounted to the ceiling and located every 30'/9m per floor (if the dormitory hallway is not enclosed, one smoke detector in each dorm room is required). These smoke detectors must be inspected for functionality every six months.
  - An audible fire alarm must be in place. Alarm volume must be 15dB

## FACILITY GUIDELINES

above ambient noise levels.

- A fire extinguisher must be within 75'/23m of each room.
- Fire drills (the practicing of an emergency evacuation procedure) must be conducted at least once every six months and be documented.
- Cooking is allowed only in designated kitchen areas.
- A properly stocked First Aid kit must be available in each dormitory block.
- Toilets must be lit at night. Residents must have access to:
  - Running water
  - Showers, bathing area, and toilets must have appropriate privacy.
  - Safe drinking water
  - Secure lockable storage for personal items

**Principle 15 - Facility Security:** It is VF Corporation policy that all suppliers establish facility security procedures to guard against the introduction of non-manifested cargo into outbound shipments. Such items would include drugs, biological agents, explosives, weapons, radioactive materials, illegal aliens, and other contraband.

### P15-1M

**Code Provision:** Determine if the facility has established effective facility security procedures to guard against the introduction of non-manifested cargo into outbound shipments to the United States.

#### **Facility Guidelines**

- Video surveillance cameras (CCTV) must be utilized to monitor premises and prevent unauthorized access to cargo handling and storage areas as follows:
  - CCTV cameras must be installed in the following areas: gates, surrounding premises, packaging, carton packing, finished goods warehouse, loading and unloading areas.
  - CCTV records (tape or digital) must be maintained for at least 30 days. (Recordings must be seven days per week, 24 hours per day and continuous. Static or motion detection recordings are not



## FACILITY GUIDELINES

sufficient).

- CCTV monitors must be installed in the security guard post, security manager's office area, or another monitoring area in the facility.
  - CCTV facilities or devices must be maintained and repaired promptly.
  - The direction of the CCTV system at the loading areas needs to be directed to the inside of each parked trailer/container with illumination for clear recording.
- Access controls:
    - Unauthorized access to facilities and conveyances must be prohibited.
    - Controls must include identification of all associates, visitors, and vendors.
  - Companies must ensure that manifests are complete, legible, accurate, and submitted promptly to customs.
  - On-site security personnel, whether they are full-time contractor associates or sub-contracted associates of an outside service provider, must conduct routine and emergency activities in such a way as to ensure the highest levels of safety and security, while also protecting the dignity of the associates.
  - If associate searches are necessary to guard against theft or illegal activities, the contractor must first consult with the local labor bureau or other appropriate government agency regarding standards for conducting such searches. Associate searches, which include "pat downs" and opening handbags, etc., must be applied equally to all associates regardless of position. All associate searches must be conducted in the open, and any physical searches (i.e., pat downs) must be performed by security personnel who are of the same gender as the associate and with respect for the individual.
  - All security personnel must be trained on the facilities written security policy and related policies. All job-related training must be documented.

### **Best practice:**

- It is recommended that the facility should obtain a Global Security

Verification certificate.

**Principle 16 – Environment:** VF Authorized Facilities must comply with all laws and regulations relating to environmental protection in the countries in which they operate. Facilities must have policies and procedures in place to ensure environmental impacts are minimized with respect to energy, air emissions, water, waste, hazardous materials and other significant environmental risks. Facilities are expected to make sustainable improvements in environmental performance and require the same of their suppliers and sub-contractors.

### **P16-1M**

**Code Provision:** Determine if the facility complies with all laws and regulations relating to environmental protection in the countries in which they operate.

#### ***Facility Guidelines***

- The facility must be in full legal compliance with all environmental license and environmental discharge permits and work to minimize environmental exposure to energy, water, chemicals, air emissions, and wastes. Non-compliance with the local environmental law with no corrective actions is also not acceptable.
- All wastewater, including domestic and process water, must be treated on-site or off-site before discharging into the natural environment. If the septic tank is used in the facility, this can be considered as a treatment method for domestic wastewater. However, it is not sufficient for process water. Facilities must have a mechanism to prevent wastewater from mixing with stormwater that is discharged back into the natural environment.
- All facilities which use more than 50m<sup>3</sup> of process water per day must adhere to VF global wastewater guideline. Wastewater sampling and report must be conducted twice a year by the certified third-party laboratory, or ILAC accredited laboratory, submission deadline 31 January and 30 June of each year. Both test report must be submitted to [globalwastewater@vfc.com](mailto:globalwastewater@vfc.com); the hard copies must be retained in the facility for auditor's onsite examination. Discharging domestic or process water into the natural environment without further off-site treatment at a Publicly Owned Treatment Works (POTW) is not acceptable. Wastewater must be treated before discharging into the natural bodies. Effluent treatment plant must be functional with

## FACILITY GUIDELINES

sufficient capacity, appropriate technology, and operational control; it must be managed by competent personnel.

- Qualification and testing parameters of wastewater must meet the standards in the VF Global Wastewater Discharge Standards.

### VFC Global Wastewater Discharge Limits

#### Sampling and Traditional Parameters

Parameter	Limit Value
Temperature*	≤37°C*
pH, Standard Units	6.0-9.0
Total Suspended Solids (TSS)	≤30 ppm
Biological Oxygen Demand (BOD)	≤30 ppm
Chemical Oxygen Demand (COD)	≤200 ppm

\*Must the facility be located in a region with an ambient temperature consistently above 37°C; the discharge temperature must not exceed the temperature of the receiving body of water.

#### Chemical Constituents

Parameter	Lower Value	Limit
Antimony	≤0.50 ppm	
Arsenic	≤0.01 ppm	
Cadmium	≤0.01 ppm	
Chromium	≤0.10 ppm	
Cobalt	≤0.02 ppm	
Copper	≤0.25 ppm	
Cyanide	≤0.20 ppm	
Lead	≤0.10 ppm	
Mercury	≤0.01 ppm	
Nickel	≤0.20 ppm	
Zinc	≤1.00 ppm	
Color	≤150 ADMI units OR 150 CO-PT	

## FACILITY GUIDELINES

	units
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### Other Parameters

Parameter	Limit or Requirement
<b>Coliform</b>	400 bacteria per 100ML
<b>Foam</b>	No visible discharge of floating solids or persistent foam
<b>Domestic Sewage</b>	All wastewater, including domestic sewage, must be properly treated before being discharged to the environment. If a public treatment facility is not available, then the factory must properly treat sewage onsite before discharging.
<b>Lab Equipment</b>	The facility shall have a pH meter, Imhoff Cone, and Thermometer in good working order.
<b>Flow Meters</b>	The facility shall have, at a minimum, functioning flow meters at the input and output points of their wastewater treatment facility.

Illegal discharge of wastewater or bypassing treatment facilities will not be tolerated.

### Wastewater Sampling Methods

#### Sampling Methods

#### Sampling by Third-Party Laboratory

All sampling and wastewater analysis must be conducted by a **certified third-party laboratory two times per calendar year** to ensure the integrity of the samples and the analysis.

#### Contact Details for Third-Party Laboratories

Company	Website
<b>SGS</b>	<a href="http://www.sgs.com/en/Office-Directory.aspx">http://www.sgs.com/en/Office-Directory.aspx</a>
<b>Bureau Veritas</b>	<a href="http://www.bureauveritas.com/wps/wcm/connect/bv_com/group/home/worldwide-locations">http://www.bureauveritas.com/wps/wcm/connect/bv_com/group/home/worldwide-locations</a>
<b>Intertek</b>	<a href="http://www.intertek.com/contact/">http://www.intertek.com/contact/</a>

In addition, suppliers may contact their applicable national accreditation bureau to find certified laboratories in their jurisdiction. The International Laboratory Accreditation Cooperation (ILAC) lists national accreditation bureau contact details on its website.

**ILAC members contact details:** [https://ilac.org/members\\_contact\\_details.html](https://ilac.org/members_contact_details.html).

While highly unlikely, must a supplier be unable to find a certified third-party

laboratory to conduct the wastewater sampling and analysis, it is the duty of the supplier to contact VFC at [GlobalWastewater@vfc.com](mailto:GlobalWastewater@vfc.com) in a timely manner, well ahead of the deadline for report submission. In this unlikely scenario, VF Corporation will offer assistance to suppliers to find a certified third-party laboratory, but it at all times remains the responsibility of the supplier to submit the proper wastewater discharge reports by the deadlines.

### Sample Collection Point

If the local authorities designate a sampling point under applicable regulations, then that sampling point must be used. In the absence of legal regulations, the sampling point will be determined by the third-party laboratory after reviewing the wastewater treatment plant and flow patterns.

### Composite Sampling

The certified third-party laboratory is to conduct a 2-hour composite sampling at the sample collection point, where a minimum of 6 grab samples will be taken at regular intervals of 15-20 minutes. An automatic sampler may also be used by the laboratory where applicable.

### Sample Storage

Samples will be properly stored at the correct temperature and using the proper preservation techniques as determined by the certified third-party laboratory.

### Reporting Guidelines

#### General Guidance

VF Corporation will only accept reports generated by the certified third-party laboratory that conducted the wastewater sampling and wastewater analysis. Reports written by suppliers or edited by suppliers in any way will not be accepted by VFC.

#### Guidelines for Laboratories

In addition to the normal set of information included in the laboratory reports related to the sampling and analysis performed by the laboratory, reports must include:

- All relevant contact information for the selected laboratory (email address, mailing address, telephone details)
- Details of technician(s) performing the sampling
- Date and time of sampling along with a sampling details
- Name and contact details of staff performing the sampling
- Date and time of analysis along with analysis details
- Name and contact details of staff performing analysis

## FACILITY GUIDELINES

- Analytical method used in analysis
- Laboratory certifications, accreditations, affiliations, and other relevant details

### Reporting Deadlines

Suppliers are required to complete wastewater sampling and testing by third-party certified laboratories twice per year according to the following schedule:

#### *Annual Report 1*

Submission Deadline	January 31
Sampling Window*	November – January

\*Sampling must take place during these months.

#### *Annual Report 2*

Submission Deadline	June 30
Sampling Window*	April – June

\*Sampling must take place during these months.

### Submission of Reports

The original third-party certified laboratory report must be submitted by the specified deadlines to [globalwastewater@vfc.com](mailto:globalwastewater@vfc.com) by the supplier with the following details included:

- Supplier and facility name/ID
- Name and contact details of responsible person at supplier facility

Suppliers are also expected to keep a hard copy of the original report for inspection during the VF audit.

- Air emission from processes such as coating, spraying, painting, and printing must be filtered utilizing wet scrubbers, a water bath, etc. per legal regulations. An annual air emission testing report from a qualified 3rd party must be provided.
- Emergency procedures and procedures for incident reporting and investigation of events or system failures impacting air, water, or another pollutant emission must be in place.
- Facilities must ensure compliance when acquiring resources from the natural environment and have the appropriate permits relevant to water extraction, energy use adoption, wood, minerals, metals and other raw materials extraction and consumption.

## FACILITY GUIDELINES

- Improper disposal of hazardous waste is not acceptable, e.g., dumping hazardous waste including all used chemicals containers on bare soil. Hazardous waste must be disposed of by a licensed contractor (where regulations exist). Signs of large chemical spills affecting the surrounding environment is not acceptable. The facility must remediate the spill immediately.
- All chemicals used in the facility must be documented; a full chemical inventory must be in place with related material safety data sheet (MSDS).