

Enhanced Human Rights Due Diligence Policy for fire, structural and electrical safety in Bangladesh

As of 1 January 2023

Introduction

This policy is a specification of the Fair Wear Human Rights Due Diligence (HRDD) Policy. In Fair Wear's HRDD Policy, due diligence is the continuous process that businesses should carry out to identify and act upon actual and potential risks for workers in its supply chains. Additional policies are developed when there is an enhanced risk for severe harm.

A decade after the tragedies of the [Tazreen fire](#) and the [Rana Plaza collapse](#) fire, electrical and structural safety still poses a specific and immediate risk in Bangladesh. Regulations regarding fire, electrical and building safety have been underdeveloped and enforcement of such regulations remain weak leading to unsafe working conditions at production locations. According to the OECD, structural integrity, electrical safety, and fire hazards are risks of severe harm.¹ Given the enhanced risk of **FIRE, STRUCTURAL, AND ELECTRICAL SAFETY IN BANGLADESH**, additional action is needed, above and beyond what Fair Wear requires of its member brands in its HRDD policy. This enhanced HRDD policy is meant to outline membership requirements to address this specific risk in Bangladesh and substitutes the Enhanced Monitoring Programme Bangladesh (2018).

The Fair Wear Policy - Code of Labour Practices

This policy falls under the Code of Labour Practice: Safe and Healthy working conditions.

"A safe and hygienic working environment shall be provided, and best occupational health and safety practice shall be promoted, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Appropriate attention shall be paid to occupational hazards specific to this branch of the industry and assure that a safe and hygienic work environment is provided for. Effective

¹ OECD Due Diligence Guidance for Responsible Supply Chains in The Garment and Footwear Sector – OECD 2018

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regulations shall be implemented to prevent accidents and minimise health risks as much as possible (following ILO Convention 155). Physical abuse, threats of physical abuse, unusual punishments or discipline, sexual and other harassment, and intimidation by the employer is strictly prohibited.” See the ILO [Code of practice on safety and health in textiles, clothing, leather and footwear](#).

Following the ILO Convention, “physical abuse, threats of physical abuse, unusual punishments or discipline, sexual and other harassment, and intimidation by the employer is strictly prohibited’ is part of a safe and healthy working environment and as such included in the Fair Wear Code of Labour Practices. However, this policy is a further elaboration on the enhanced risk in relation to fire, building and electrical safety in Bangladesh. While a gender lens has been applied to this policy, gender-based violence is not included compared to the previous Enhanced Monitoring Programme for Bangladesh (2018). As such, gender-based violence and gender occupational health and safety risks are integrated into the HRDD policy and policy on gender equality. Member brands are expected to prevent, mitigate and address these other risks in their due diligence process.

ILO adds safety and health to Fundamental Principles and Rights at Work

During the International Labour Conference 2022 of the ILO, the principle of a safe and healthy working environment has been integrated into the ILO's Fundamental Principles and Rights at Work. Under the Declaration on Fundamental Principles and Rights at Work, ILO Member States are required, regardless of their level of economic development, to respect and promote these principles and rights, whether or not they have ratified the relevant Conventions. Each of the fundamental principles is associated with the most relevant ILO Conventions. The new fundamental Conventions will be the Occupational Safety and Health Convention, 1981 (No.155), and the Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187).

Importance of the RMG Sustainability Council and International Accord for HRDD on Fire, Electrical and Building Safety

The new International Accord and its predecessor the Bangladesh Accord have made tremendous achievements in making production locations in Bangladesh safer and healthier working environments. Per June 2020, the Bangladesh Accord operations were transitioned to the RMG Sustainability Council (RSC). The RSC implements the inspections, remediation monitoring, safety training, and a safety & health complaints mechanism at the RMG production locations supplying to Accord signatory companies.

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Based on the experiences of local and international stakeholders with the RSC and the International Accord, we have observed the following strengths of becoming a member of the International Accord:

- no other safety initiative (including the National Initiative or Nirapon – see Annex 1) or individual garment brands sourcing in Bangladesh can match the **local technical engineering expertise** that the International Accord and the RSC combined can offer in terms of fire, building and electrical safety.
- individual brands do not per definition contribute to a **level playing field** and to the leverage which is key for implementing the structural changes needed. The International Accord, however, requires its signatories to use their combined leverage, which is instrumental in driving structural improvements. Only through the **collective leverage** of the International Accord, the infrastructure that is needed to support all production locations can exist. Moreover, engagement with production locations is coordinated, therefore avoiding duplication and leading to more impact for workers.
- the International Accord is a **legally binding agreement** between brands/retailers and trade unions. It is in its nature a risk prevention strategy around **Freedom of Association (FoA)** in line with Fair Wear's strategic directions. Engagement and implementation are in agreement with international and local unions. At production location level the International Accord promotes **workplace dialogue through health and safety committees** which is an important step to fulfil the requirements on FoA as stated in [Fair Wear's FoA policy](#) and [guidance for brands](#).

In conclusion, the RSC's engineering capacity and resources to follow up intensively, combined with the legally binding nature of the International Accord and the collective leverage of brands, offers the best prospects for driving prevention, mitigation and remediation of (potential) adverse impacts towards fire, electrical and building safety in Bangladesh. This is the reason why Fair Wear strongly encourages members to engage with the International Accord. **We view that signing the International Accord – and by default enrolling your production locations in the system of the RSC - is the best available option for garment brands to prevent or mitigate harm.**

Policy Change

Following Fair Wear's policy on third-party agreements, it is not within our mandate to make membership of a current third-party agreement part of the Fair Wear membership obligations.

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Hence, Accord signatory is not a mandatory entry requirement for Fair Wear membership. However, we emphasize that engaging with the Accord is the best available option for preventing or mitigating harm in relation to the risk connected to building, fire, and electrical safety. We will use different instruments to promote the Accord, most notably through brand liaising, brand performance check, the below policy and through industry alignment efforts in Europe and beyond.

As Fair Wear we therefore foresee **two pathways for member brands** that (plan to) source in Bangladesh to execute human rights due diligence on building, fire, and electrical safety in the best available way:

- 1** Preferred option: becoming a **signatory of the International Accord** and as a result enrol your production locations in the system of the RSC.
- 2** Secondary option: as Fair Wear cannot make it required for their member brands to join another initiative, we provide the alternative option for member brands to **source only from production locations that are covered by the RSC**. This option includes the responsibility to cooperate with the other customers of that production location that are signatory of the International Accord, and a burden of proof on how member brands work on joint prevention, mitigation and remediation with the signatories of the International Accord. Member brands are expected to take this into account in their annual budget and demonstrate proof of actual (financial) contribution to what is required from the RSC activities. Member brands that are not a signatory of the International Accord miss out on the full range of information and services (see overview in Annex 2). This means that member brands must make significant additional efforts to get access to the information that is necessary for contributing to prevention, mitigation and remediation together with International Accord signatories in that production location. This is particularly relevant for collaborating on complaints that are received through the RSC complaints committee.

In consultation with local and international stakeholders, the third option provided by Fair Wear under the previous *Enhanced Monitoring Programme for Bangladesh (2018)* of having production locations neither covered by the Accord nor the RSC but working on your own remediation through other means is no longer acceptable for implementing HRDD on in Bangladesh.

As specified above, gender-based violence and gender occupational health and risks fall outside the scope of this policy.

What if a member brand doesn't comply to this policy?

This policy will relate to the **repeated non-compliance policy** which prevents lack of action for these indicators that have severe consequences on the workers' lives and should not go on for several years while a member can remain in the good or leader category by compensating in other areas. This negatively affects Fair Wear's and their members' credibility to assure step-by-step improvements of working conditions.

Member brands will be assessed in the Brand Performance Check on an annual basis. The Brand Performance Check will report on the member progress to continuously monitor and address HRDD risks. If a member brand does not comply with this policy, it will score insufficient on the relevant indicators. Insufficient scores trigger the repeated non-compliance policy, which means that when it becomes clear in the next brand performance check a member did not follow up on the requirements, it will be placed in the 'needs improvement category', independent of the overall brand performance check score.

Member brand requirements per HRDD step for fire, electrical and structural safety Bangladesh

STEP 1: RESPONSIBLE BUSINESS CONDUCT POLICY

A Responsible Business Conduct (RBC) policy should reflect the specific risks of harm. Member brands sourcing from Bangladesh should include commitments towards addressing the sector specific risks on building, fire and electrical safety in Bangladesh in their RBC policy.

Member brands sourcing in Bangladesh are required to specify in – or as part of – their annual Fair Wear work plan how they will implement the activities outlined in this enhanced HRDD policy, including their positioning towards the International Accord. Implementation of this policy will be part of Fair Wear's evaluation of the member brands' performance during the annual brand performance check.

STEP 2: IDENTIFY ACTUAL AND POTENTIAL HARMS

Scoping exercise

Members should conduct a scoping exercise on several levels, such as **sector, business model, sourcing model, country level, and product level** to identify the most significant risks of harm in its supply chain. Building, fire and electrical safety is a known sector risk. For the country risk scoping, Fair Wear members can seek information from Fair Wear and other sources to determine the likelihood of risk and the severity of harm. Through Fair Wear's multi stakeholder approach, members

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can draw from a wide range of validated evidence and information. Based on that, members must determine significance of the risk of harm.

The unique country risk factors of Bangladesh are particularly relevant when scoping occupational health and safety risks in relation to fire, building and structural safety. For example, quality of inspections, building height, the extent of urban planning, the quality of the air, etc. greatly affect the health and safety risk characterisation. Production locations that are associated with higher risks for harm or operate in a country that holds higher risks - as is the case in Bangladesh - should be prioritised in setting up prevention, mitigation and remediation activities (see risk assessment).

Sourcing model or business model risks may also impact the existence of significant risks. For example, having a much-diversified supply chain, working through agents, or the nature of a contractual relationship, may increase or decrease the risk of harm. In the context of Bangladesh and the decision of becoming an International Accord signatory, this might be negatively impacted by having a business model that includes agents, or by only sourcing a very small percentage in Bangladesh which makes the International Accord membership relatively expensive and raises the question of leverage. Member brands should include sourcing model or business model risks in their risk scoping and integrated in the improvement and prevention plans.

(Pre-order) due-diligence sourcing dialogue

Member brands should engage in sourcing dialogues with suppliers. This includes putting the company values and commitments into practice in (written) agreements with suppliers. It requires transparency and trust. In the context of fire, structural and electrical safety in Bangladesh, the company must explain to suppliers how they prevent, mitigate and cease harm and what they expect from the supplier. Member brands should discuss the fire, structural and electrical safety status with the production location, share how they plan to support the production location, whether it is part of the RSC and what policies and procedures are in place. The Know Your Supplier tool supports member brands in doing so. In addition, the remediation status on the [RSC website](#) should inform the members' sourcing decision. Member brands are refrained from starting a business relationship in production locations that are declared ineligible by the RSC. Member brands that are not a signatory to the Accord, must only select production locations that are covered by RSC.

Onboarding workers and managers

As part of the regular HRDD policies, production locations supplying to Fair Wear members must undergo an onboarding programme that raises awareness of labour rights among production location managers and workers and sets a basis for efficient social dialogue structures. For Bangladesh, we require that risks related to building, fire and electrical safety are included explicitly in the onboarding.

Conducting a risk assessment (linking the scoping exercise to production location level)

The outcome of the scoping exercise serves as input to the risk assessment of individual production locations. For production locations in Bangladesh this means requiring additional data from the production location, including subcontractors used and collecting additional information on the fire, electrical and structural safety situation (e.g. building licenses and latest fire safety inspection reports). A member brand should also check whether the production location is located in a multipurpose and/or shared building as this may result in additional risks for building and fire safety. As Fair Wear only allows production locations covered by the RSC, the [RSC website](#) should be used to investigate the remediation status of the production location. Production locations associated with higher risks for harm should be prioritised. Meaning an in-depth assessment should determine the actual impact on the ground. For production locations in Bangladesh this means they are automatically in an improvement programme. The following steps should be included:

- Member brands should ensure that the supplier has undergone a qualified inspection against national and international standards. Member brands should verify that the supplier has been assessed by a qualified professional (e.g. structural engineers, fire protection specialists, electrical engineers) with relevant qualifications. The RSC is regarded as the qualified organisation to provide for qualified inspections. Member brands must ensure they are informed on the date of the inspections and have access to the reports.
- Supplier assessments (audits) should determine whether workers are aware and can exercise their right to refuse unsafe work and are not discouraged from reporting accidents. During the assessments, the audit teams shall interview women and men in a balanced proportion to assess if there is any difference in workers' awareness, perceptions, participation to trainings and safety committees and use of the complaints mechanism. Assessments should require worker interviews to be held in an environment where the worker feels safe to respond honestly. Audits teams shall offer women workers to be interviewed by female auditors if this would make them

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feel more at ease. Assessments teams should also include participation from workers and trade unions and representative organisations of the workers own choosing.

STEP 3: CEASE, PREVENT OR MITIGATE HARM

Prevent & mitigate

Fair Wear member brands should seek to prevent or mitigate future harm in its supply chain.

A key prevention strategy is engaging with suppliers that already have measures in place to prevent impacts. For health and safety impacts, production locations that are in the RSC programme are equipped to implement health and safety inspections and remediation monitoring, safety training and safety complaints handling functions. Moreover, the labour-management Safety Committees in the production locations are equipped and empowered to monitor and address workplace safety on a daily basis. As women are the backbone of the Bangladeshi garment industry, any prevention and mitigation programme shall include a gender lens and women's voices shall be captured and valued.

Responsible purchasing practices

The enterprise should develop purchasing practices and pricing models that account for benefits and investments in decent work, including fire, electrical and structural safety. This should be reflected in freight on board (FOB) prices together with traditional pricing considerations such as purchased quantities, cost of materials, skill requirements, etc.

Increasing awareness and emergency preparedness

Inspections and safe buildings are not enough to guarantee worker safety. Workers are not only best placed to monitor their working conditions and signal problems as they arise, as the main users of those building, they also play a crucial role in preventing accidents or fires by complying with safety requirements. Worker training, therefore, must be ensured in all production locations supplying member brands. While as many workers as possible shall be trained, women and men shall receive the same amount of training. In addition to that, the demographic composition of the participants shall include a reasonable proportion of workers who belong to the most marginalised or disadvantaged groups (e.g., migrants, low-caste workers, and disabled workers, to name a few). The trainers shall speak the local language/dialect of the most representative migrant worker population of the industrial area or the factory. The same shall apply to internal health and safety committees. Ongoing prevention and mitigation are reliant upon worker engagement through health and safety committees including worker representation. All these are provided for by the RSC.

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Following the scoping exercise and risk assessment, member brands should ensure that a corrective action plan (CAP) per production location is developed that details actions to be taken with clear timelines, developed with input from experts. According to the OECD, for risks of severe harm (e.g. structural integrity or electrical safety and fire hazards, etc.) CAPs should be developed in collaboration with qualified professionals (e.g. structural engineers, fire protection specialists, electrical engineers, etc.).

The member brand should support its suppliers in the implementation of CAPs. In case production locations need upgrades, member brands must (co-)finance and/or facilitate access to financing for the upgrades.

Fair Wear member brands are required to cooperate with other customers at the same suppliers to ensure corrective action and mitigation of issues found during such inspections. Becoming an Accord signatory will facilitate this cooperation, ensure coordinated efforts and combined leverage.

In cases in which neither the enterprise nor the supplier can secure adequate financing to prevent or mitigate the adverse impact and/or in cases in which prevention is not feasible, the enterprise should weigh the risk of continuing to engage and disengage if necessary (see below – Cease). Also, in this case the RSC can coordinate efforts by facilitating joint action of brand signatories in case the supplier cannot secure funds needed to improve.

Cease:

Where there is severe and imminent danger identified, action by member brands should be taken immediately to protect workers. In cases in which impacts or risks of impact cannot be isolated, this may mean that production is suspended until the building is determined to be safe for re-occupancy. Appropriate steps must be taken to ensure workers are removed from danger and receive compensation if harm occurred or for loss of income in case production locations is closed to address the danger (see step 6). After failed attempts at preventing or mitigating severe harm and corrective actions have not been taken within the agreed upon timeframes, a member brand can decide to disengage from a production location as a last resort. When disengaging the Fair Wear responsible exit strategy needs to be followed or align with the Responsible Exit Strategy of the International Accord. When a production location is member of the RSC, Fair Wear expects that the member brand draws on the RSC's expertise to make this judgment call.

STEP 4: TRACK

In case of risks of severe harm in relation to health and safety, Fair Wear expects their member brands to include the following stakeholders in its monitoring as described in the OECD guidance²:

- Qualified independent professionals (for example structural engineers, fire protection specialists and electrical engineers) should monitor and evaluate the implementation of the CAP and verify corrective actions have been taken within the agreed-upon timeframe.
- Workers, through democratically elected worker representations or unions, should participate in ongoing monitoring (as feasible) of risks of harm. Workers who are specifically appointed for the monitoring process shall be equally representative of women and men. In cases in which workers, or other stakeholders, raise allegations through a grievance mechanism, the supplier and member brand should ensure that the grievance is taken up and handled according to Fair Wear's complaints procedure.

STEP 5: COMMUNICATE

Fair Wear members should publicly communicate their RBC policy, including its specific policy towards health and safety in Bangladesh. Furthermore, brands should publicly report in their annual social report on progress and ongoing monitoring of health and safety in Bangladesh. In the report the brands should publicly refer to its relation of membership with the International Accord and/or the RSC.

STEP 6: PROVIDE FOR OR CO-OPERATE IN REMEDIATION

When adverse impacts are found – meaning a harm as already occurred - Fair Wear expects their member brands to take an active role in ensuring that effective and timely remediation takes place. In the case of fire, electrical and structural safety, member brands should provide for remediation in-line with the ILO Employment Injury Benefits Convention (C121). Compensation is in most cases the most appropriate form of remedy for occupational health and safety impacts, but not exclusively. Common examples include compensation for:

- medical care and related expenses
- missed work time or other lost income
- pain and other physical suffering

² https://www.oecd-ilibrary.org/governance/oecd-due-diligence-guidance-for-responsible-supply-chains-in-the-garment-and-footwear-sector_9789264290587-en;jsessionid=qvMHaXQnKjacaV7FDEo4BAeNo-6VC3ry-2l3rtBF.ip-10-240-5-173

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- permanent physical disability or disfigurement
- loss of family, social and educational experiences
- emotional damages resulting from the above.

Compensation shall be tailored to the caused damage. As such, a fair financial compensation should be assessed against the temporary or permanent damages³ caused to the workers and their families (e.g. after the extensive damages suffered by women in the Rana Plaza incident, some women were left infertile; other workers are permanently impaired and need life-long care services; workers with children need extra financial support).

COLLABORATION

Member brands are required to align/coordinate remediation with other Fair Wear brands sourcing at the same production location. Member brands may also collaborate with other customers active in a production location to establish effective remediation schemes for workers.

Complaints handling and grievance mechanism

When complaints come in through the RSC helpline that are non-health and safety related, the RSC will send an email to all involved brands. Fair Wear brands are required to submit these complaints as complaints in FWs complaints system. To ensure that all workers feel safe to file a complaint, female complaints handlers shall be appointed in all factories. As this complaints mechanism can be used to report gender-based violence or sexual harassment cases, complaints handlers shall receive a gender-sensitive training on how to handle these reports.

³ Six years on from Bangladesh's Rana Plaza tragedy, one in five survivors' health is deteriorating, Actionaid Bangladesh, 24 April 2019, <https://actionaid.org/news/2019/six-years-bangladeshs-rana-plaza-tragedy-one-five-survivors-health-deteriorating>

ANNEX 1: Situation, facts and figures

In Bangladesh, the garment sector is the main contributor to economic development, as it is responsible for 81% of the country's export. Its competitive advantage depends heavily on low production costs. The garment industry offers many possibilities for local entrepreneurs and employment for garment workers, yet its volatility and downward pressure on prices put them in a vulnerable position.

Structural, electrical and fire safety

Tragedies, such as the [Tazreen fire](#) and the [Rana Plaza collapse](#), clearly signal that structural, electrical and fire safety poses a specific and immediate risk in Bangladesh. After Tazreen (November 24, 2012, death-112 and Rana Plaza (April 24, 2013, death-1100) several deadly incidents occurred in Bangladesh either fire from electrical short circuit, boiler blasting, chemical fire because of unsafe storing and so on. More recent examples are Aswad Composite (October 8, 2013- death-10), Tampaco foils fire through boiler blasting (September 10, 2016- death 41) Churihatta chemical fire (February 20, 2019- death-78), Fire at FR Tower Banani (March 28, 2019- death 25), and recently Chemical explosion in BM container depot (June 4, 2022- death-50).

Regulations regarding structural, electrical and fire safety have been underdeveloped and enforcement of such regulations is weak. This has led, amongst others, to many buildings not having the proper (building) licenses and illegal additional floors which might overload the building. The level of fire and electrical safety is also low. A clear example is the fact that buildings oftentimes do not have enclosed staircases, which are necessary to prevent smoke from blocking the exits in case of a fire, trapping workers in the building. A large number of production locations also have problems with electrical safety and do not have proper storage of chemical resources.

The Bangladesh Accord: Ensuring safe jobs for millions of garment workers

In response to the 2013 Rana Plaza collapse, UNI Global Union and IndustriALL negotiated the ground-breaking, legally binding Bangladesh Accord with garment brands sourcing at production locations in Bangladesh. Ultimately, over 200 brands signed the 2013 agreement, and its 2018 renewal, securing safer jobs for over two million factory workers in Bangladesh.

Lauded as “the most effective campaign of the globalized era,” the Bangladesh Accord revolutionized structural, electrical and fire safety in the Bangladeshi garment industry. It established an independent body to inspect production locations and set timelines for correcting occupational

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hazards. Production locations that do not follow the inspection and remediation requirements – now under the RSC - are ineligible to produce for Accord signatories, which include some of the largest fashion labels in the world.

These brands are responsible for ensuring that production locations have adequate resources for repairs. When two retailers refused to pay their fair share for remediations, the global unions launched arbitration proceedings and secured substantial settlements to be put towards the cost of repairs. As a result of the Bangladesh Accord, workers and unions now have the right to refuse unsafe work, the right to report a safety issue without fear of reprisal. Over 1.8 million workers have been trained in workplace safety, directly leading to thousands of worker-led hazards being identified and fixed.

The International Accord

On 25 August 2021, it was announced that an agreement – which builds on the Bangladesh Accord's progress – has been reached after negotiations between international garment and textile brands and trade unions. This agreement, which took effect on 1 September 2021, called the 'International Accord for Health and Safety in the Textile and Garment Industry', is a legally binding agreement between companies and trade unions to make Ready-Made Garment (RMG) and textile production locations safer for the workers who make our clothes. It follows the so-called 2018 Transition Accord, which ran from 1 June 2018 to 31 August 2021. The RMG Sustainability Council (RSC), which has been set up with a tripartite governing structure in Bangladesh, with representatives from the industry, brands and union holding equal voting rights, has since taken over the Bangladesh operations, infrastructure and staff of the Bangladesh Accord. The current agreement shall expire on 31 October 2023. However, an extension of the International Accord is possible.

Difference between RSC and the National Initiative and Nirapon

Although the standards of the RSC and National Initiative are similar, the RSC comparatively has the best developed engineering capacity that is concentrated in a local organization (rather than a consultancy firm) and the resources to follow-up more intensively. This allows for high quality inspections and regular remediation follow-up. The RSC engineering capacity, combined with the legally binding nature of the Accord, the Accord protocols and the collective leverage of brands, offers the best prospects for driving remediation towards the required standard on health and safety. In addition, the National Initiative also does not offer the workplace programmes that the Accord/RSC offers at production locations such as health and safety committee training and

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complaints helplines. The National Initiative production locations do not benefit from the follow-up and leverage exercised by committed brands, which is instrumental for driving remediation.

Nirapon is a member-led organisation (mostly former members the Bangladesh Alliance) that provides safety management programmes provided by a third party. Safety management programmes are useful when prevention and remediation efforts have taken place in order to keep up the capacity and knowledge of management and workers at a production location, but Nirapon does not provide a remediation process to follow up on CAPs or grievances.

Nevertheless, the RSC and Nirapon have the ambition to coordinate in order to ensure that there is no duplication of work. The outcomes of the Nirapon's safety programmes will be shared with the RSC Case Handler who can coordinate on further remediation. The RSC would review the Nirapon reports and accept them if they are up to standard.

ANNEX 2: Information overview for Accord signatories

Brands that are not a signatory of the International Accord do not have access to the full range of information and services. When brands source from RSC covered production location without signing the International Accord, they miss out on key information about the status of their suppliers. There is no infrastructure in place to keep them informed about:

- upcoming safety inspections.
- complaints filed to the Safety and Health complaints mechanism.
- the so-called "escalation status" of their suppliers. The RSC has an escalation system to issue warnings to suppliers that are not showing sufficient progress in remediating safety risks. This is not communicated publicly. The escalation procedure has 3 stages, the third of which (ineligibility) means the supplier can no longer be part of the RSC program and brands have to stop sourcing from the supplier. Non-signatory companies would not be invited to Stage 2 meetings in which an action plan to address urgent outstanding issues are addressed.
- the detailed status of Fire Alarm / Sprinkler system design and installation as well as structural (Detailed) Engineering Assessment approval, both of which are logged in an internal database FFC (not public).