NIRAPON

Nirapon Member Guide

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Photo Credit: Mahmud Hossain Opu

1 Introduction

Workplace safety is bigger than infrastructure and engineering; it's about having the right people and processes in place to create and maintain a sustainable culture of safety management.

This document is designed to help Nirapon members engage with their factory partners to build this culture of safety.

It details:

- The general roles and functions of the three partner service providers that form Nirapon
- What to expect as a Nirapon member and how you can contribute to Nirapon's success
- How to communicate effectively with factories
- Building blocks for a safe factory working environment and a systems-based approach to safety management

We are pleased to be your partner as we advance workplace safety to benefit all industry stakeholders. Together, we can create a sustainable culture of safety that's prioritized and owned by every factory in Bangladesh.

2 Who We Are and What We Do

Nirapon is a member-led organization dedicated to advancing worker and workplace safety in Bangladeshi factories.

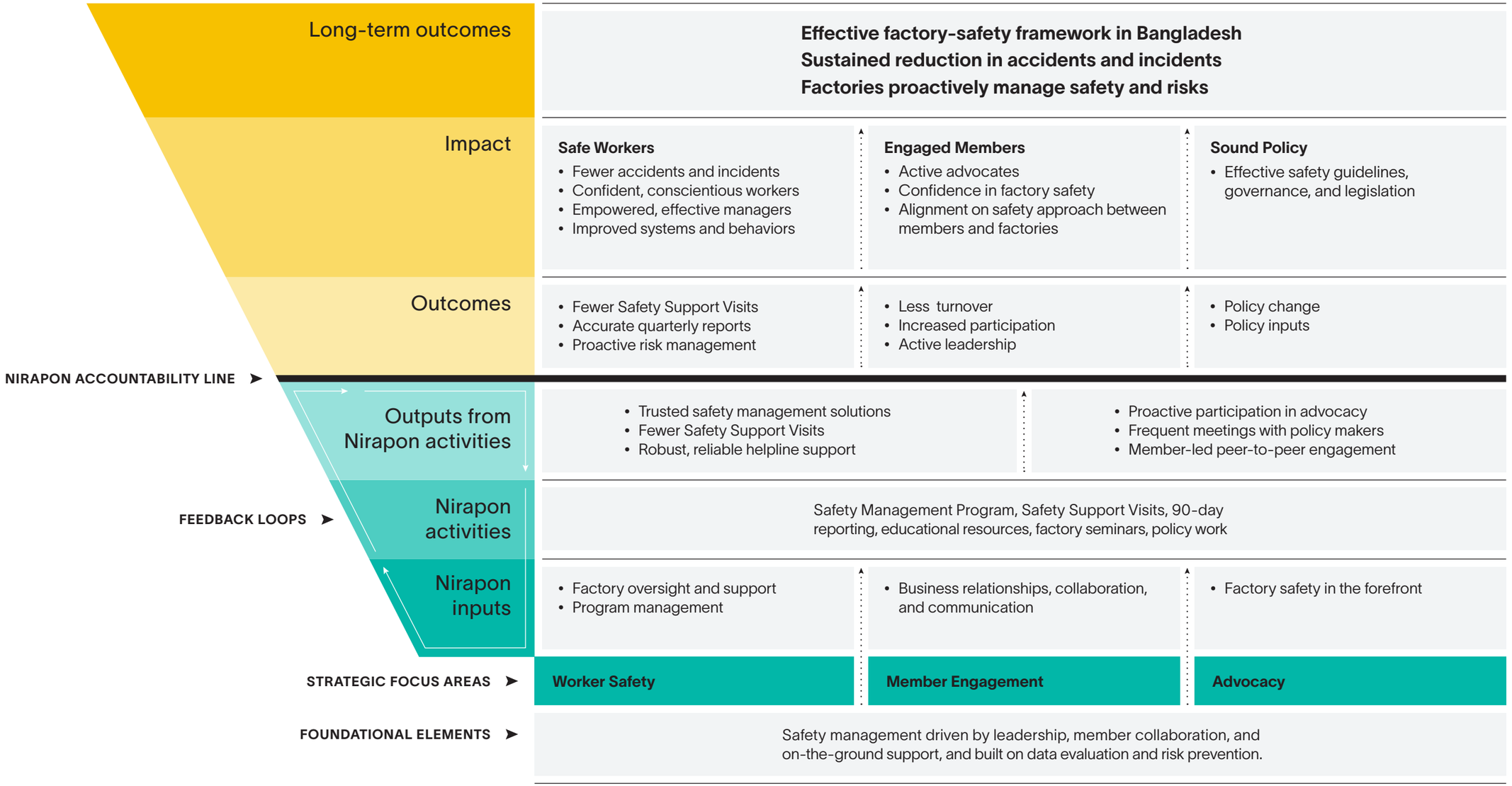
- **Our Vision:** An industry where worker and workplace safety are integral parts of doing business.

- **Our Mission:** To provide resources, tools, and guidance through partnerships that advance worker and workplace safety.

Our members work with their factories to develop a workplace culture that prioritizes occupational health and safety and encourages all stakeholders to identify and proactively address safety hazards. We believe this cultural shift leads to positive behavior change, reduced risk, and improved worker safety.

Nirapon Theory of Change

A CULTURE OF FACTORY SAFETY



Our approach

A different style of safety management

Nirapon takes a systems-based approach to advancing safety management in factories. This means we focus on helping factories examine the systems in their workplaces – from equipment and layout to programs and processes – and identify hazards and risks that should be managed and mitigated.

We support our members, so they can support their factories.

Nirapon members manufacture goods in Bangladeshi factories. Our organization provides members with a framework and foundation for helping their factories make occupational safety and health a business priority.

We:

- Work with members to implement the Nirapon Safety Management Program (SMP) in their partner factories.
- Provide members with regular safety management guidance and closely monitor and review quarterly safety management reports from their factories, helping to enhance efficiencies and overall safety.
- Help members collaborate and consolidate their occupational safety and health programs to provide more consistent experiences for shared factories.
- Offer educational resources and programming through our Learning Center – including Master Classes, safety bulletins, and briefings based on trends and risk predictions – to help members stay engaged and informed.

Members work closely with their factories to set expectations and leverage their business relationships to ensure factory owners comply with safety laws and manage and maintain safe workplaces. Through this work, Nirapon members support sustainable behavior change in factories and help their factory partners develop a culture of safety management that will serve them in the long term.

For Nirapon, success is when factory owners see workplace safety as a business imperative and take proud ownership of their safety management programs and policies.

The Safety Management Program

We focus on support and education, not enforcement.

Through the SMP, Nirapon partners and members provide guidance and support to participating factories. We do not carry out audits. Our goal is to build capacity in factories and empower factory owners to proactively and proudly run safe workplaces.

Launched in June 2023, the SMP was designed to help all member factories develop, implement, and use their own safety management systems (SMS). The program encourages factories to identify hazards and develop policies, procedures, training, and other administrative controls to deal with them, continually seeking to reduce risk.

The Nirapon SMP consists of:

- A 90-day workbook and reporting process, with follow-up site visits
- Educational programming
- A worker helpline

SMP Support: The Nirapon Safety Analyst Team

Nirapon's safety analyst team, based in Dhaka, collaborates with our service partners and guides member factories through our comprehensive, systems-based approach to safety management. This team supports factories through our 90-day reporting process, conducts Safety Support Visits (SSVs), and provides tailored guidance that helps factory owners and managers establish effective systems to manage safety. Read Appendix B to learn more about how this team implements safety management in Nirapon member factories.

SMP Educational Programming: BRAC

BRAC is an international development organization dedicated to creating opportunities that realize human potential.

BRAC uses safety management education to help the people inside Nirapon member factories understand and uphold their roles in creating a culture of workplace safety. Through a three-year program, BRAC provides educational programming for managers and factory-based internal trainers and helps them establish their own SMSs and administrative controls.

For more on BRAC's role as our partner in the SMP, read Appendix C.

SMP Worker Helpline: Amader Kotha

Amader Kotha operates a helpline for factory workers to anonymously report safety concerns and other issues. The helpline gives workers in Nirapon-member factories a voice and provides data that helps factory management prevent recurring incidents and support behavior change. See Appendix D for a more detailed look at how partnering with Amader Kotha to utilize this helpline supports our work.

Support visits, not audits

SSVs are not audits. They are opportunities for our team to visit member factories, provide onsite support, and see firsthand how safety is being managed. These visits also serve as quality assurance of the 90-day reporting process.

Neither Nirapon nor its partner service providers will levy any punitive measures or sanctions on factories that require improvements to their safety management system or fail to meet any remediation or training deadlines.

3 How We Do It: Roles and Responsibilities

Nirapon is a registered not-for-profit company based in the United States. We are comprised of members, a Board of Directors that oversees and guides the leadership, a leadership team that manages day-to-day operations, and a safety analyst team that operates in Bangladesh. This organizational structure assures independence and credibility.

The Nirapon Leadership Team

Our leadership team consists of a Chief Safety Officer and Director of Operations. This team represents our members and serves as their main point of contact. The leadership team also coordinates with our local partners in Bangladesh, providing oversight and quality assurance, and reports progress, challenges, and opportunities to the board of directors.

You can find a more detailed outline of Nirapon leadership team roles and responsibilities in Appendix A, and board and member roles and responsibilities in the Nirapon Bylaws and Members Agreement on Trakstar.

Nirapon Members

Engaging in a Member-Led Organization

Member participation is critical to Nirapon's success. As factory customers, Nirapon members are the only entities that can compel their factory partners to participate in the Nirapon SMP. By utilizing our resources, proactively communicating with factories, and leveraging our network of engaged brands, Nirapon members actively champion positive change in factories.

Member Tools

- **Trakstar**
  Trakstar houses Nirapon member resources like this guide, policies, and procedures. When in doubt, go to Trakstar!

- **The Fair Factories Clearinghouse**
  Nirapon members use the Fair Factories Clearinghouse (FFC) as our system of record to track factories. You can find an FFC Tutorial on Trakstar.

Here's how to get started and stay engaged as a Nirapon member.

Read and be familiar with all policies and procedures.
The Nirapon Member Guide is a great place to start! You can find our other policies and procedures on Trakstar.

Read all 90-day reports and SSV summaries, so you can work with your factories to implement change.
90-day reports are key benchmarking tools for members and factory partners. You can find all 90-day reports and feedback, along with SSV summaries, in the FFC portal, which maintains information on all Nirapon member factories.

These nontechnical reports will give you the knowledge to support your factories in pursuing our recommendations for improving safety management.

TIP

We suggest identifying two people on your team to manage the process of reviewing the reports, supporting recommended changes, and encourage continuous improvement through the 90-day reporting process.

Monitor and encourage helpline use.
The helpline is a critical aspect of the SMP. Ensure your factories are leveraging this resource by regularly checking on helpline use and test calls and confirming that your factories have posted the most current helpline posters and ID cards, available in Trakstar.

Support helpline call investigations and reports.
Following a helpline call, Nirapon may carry out an investigation to better understand the incident/accident and help the factory prevent a reoccurrence. Members who partner with the factory will receive an investigation report, so you can help the factory pursue recommended changes and encourage them to submit evidence in their 90-day reports showing how changes have been implemented.

TIP

Without Nirapon member involvement and encouragement, factories don't tend to report on improvements made in response to helpline incidents. (This means there has been no learning from the incident, so it could happen again.) By encouraging factories to document the work they are doing to address incidents, members actively support behavior change and a culture shift toward pride in workplace safety.

Maintain accurate factory records in FFC. We can only work with factories that have active business relationships with Nirapon members. Keep your factory list current in the FFC by adding and removing factories as needed.

Set and manage factory expectations. Make sure all your factory partners understand your customer requirements as a Nirapon member. A Nirapon supplying factory needs to fully engage with our safety management and implementation program – from submitting reports, to enrolling in trainings, to subscribing to and utilizing the helpline.

Collaborate with fellow members. Many factories partner with several Nirapon member customers. If you are collocated at a factory with other members, work together to support Nirapon programming, communicate with one voice, and develop safety management solutions that will benefit everyone.

Advocacy
Coming soon … stay tuned!

Communicating Effectively with Factories

As Nirapon members, your most critical role is engaging with factories and helping them strive for workplace safety. Here are some tips for communicating about Nirapon opportunities and expectations with your factory partners.

All program communications sent to your factories should come directly from you. Forwarding a Nirapon-authored email can be confusing to factories and might be misinterpreted as a "Nirapon requirement" instead of a member expectation coming from you, the factory's customer.

Encourage an open dialogue with your factories. Aim for regular correspondence with factories to stay engaged and informed. If you don't receive a response to a message you've sent or see action taken in a timely manner, follow up with the factory. When factory owners recognize that safety management is a priority for you, it will become more of a priority for them.

Take a supportive and educational communication approach, especially when following up on the guidance in the 90-day, SSV, or helpline reports. By encouraging rather than accusing, and supporting rather than mandating, you will help factory owners feel empowered and inspired to make changes that are mutually beneficial.

Communicate to collocated factories with a unified voice. Factories that partner with several Nirapon members should receive clear, collective communication from you about all things SMP. Collaborating to establish consistent expectations and streamlined correspondence will help your shared factories feel guided and supported in implementing impactful, sustainable change that benefits all.

4 Resources

RESOURCE

Assessing workplace safety

Nirapon's approach to safety management focuses on safe systems, which empowers factory workers at all levels and helps them to develop a culture of mitigating and preventing hazards and risks, rather than reacting to incidents and accidents that arise from them.

When assessing workplace safety, ask these key questions:

- Does the factory have a health and safety policy in place, demonstrating a commitment by the factory owner and management to a safe workplace? Is this policy displayed in the factory and communicated to workers?
- Does the factory have a hazard and risk register along with relevant policies, procedures, and other relevant control measures in place to control all hazards and risks in the workplace?
- Are the factories and buildings in which a manufacturer is operating in good general repair and being maintained?
- Does the factory meet international standards of construction and all relevant local regulations?
- Do workers know what to do in the event of an emergency?
- Are buildings fitted with safety systems to provide both passive and active protection of the workplace?
- Are there appropriate engineered solutions in place to lower the consequences of an accident or incident, through alert, confinement, and active measures against the incident or accident as it evolves?
- What are the relevant and effective safety management systems in place to prevent any accidents or incidents from occurring in the first place?
- How is the factory demonstrating the use of risk management measures to lower the likelihood of an accident or incident?
- What workplace policies, procedures, and training measures are in place so that workers understand their role in keeping the workplace safe?
- How are workplace policies and procedures communicated to workers?
- Does the factory have systems in place to facilitate effective and cooperative industrial relations? A strong communication path between workers and their managers allows workers to report safety matters within the factory rather than solely relying on external support.
- Is there an effective grievance mechanism in place for workers to report safety- and labor-related concerns in a confidential manner? Further, is this system external to the factory, providing transparency to customers that safety and worker rights are managed appropriately?

Factory owners and managers who understand the need for this systematic approach will be able to recognize hazards and achieve an acceptable level of risk by introducing policies, procedures, training, and oversight that results in a safe, proactive factory.

RESOURCE

Basic building blocks for developing a culture of safety

Factory machinery can present myriad workplace hazards and risks. A proactive factory ensures all its machinery meets applicable safety standards, has preventive maintenance schedules and control measures in place to reduce risk, and trains workers to operate equipment and navigate hazards safely.

Proactive factories have:

- A written Health and Safety Policy for the factory signed by the owner and senior managers to demonstrate a commitment to a safe working environment. This policy should be regularly communicated to the workforce to emphasize that commitment.
- Policies and procedures for all workplace hazards, risks, activities, and tasks that have been risk-assessed and gone through a workplace consultation process. These policies and procedures should be:
  - Communicated to workers who are carrying out related tasks or activities
  - Reviewed on a regular cadence
  - Updated with the latest information
  - Reviewed / updated following an accident or incident, to incorporate lessons learned and prevent reoccurrence
- An accident investigation process that seeks to find lessons and prevent reoccurrence rather than apportion blame.
- An effective grievance mechanism for workers to confidentially report safety- and labor-related concerns within the workplace, as well as an external means of having concerns met.
- Schedules, timetables, and capacity planning to arrange all work, management activities, preventive maintenance, safety activities, and training to complement production schedules.
- Well-maintained, regularly serviced, and externally inspected boilers, air compressors, and all other ancillary equipment.
- Appropriate chemical storage, chemical safety labeling, and risk-assessed processes and supervision for the use of all hazardous substances.
- Emergency procedures that are well-known and regularly practiced to deal with spillages, decontamination, first aid, and other incidents.
- Reliable, well-maintained, capacity-planned, and properly functioning machinery essential to production.
- Overlapping safety systems in place, such as:
  - Centralized fire detection and warning system (CFDS)
  - A fire pump and hydrant system (as per applicable regulations)
  - A sprinkler system (in certain circumstances)
  - Building construction to separate the building into smaller compartments designed to contain a fire
- Daily inspections and regular preventive maintenance to keep machines and systems operating at their designed capacity.
- A written standard operating procedure on maintenance reporting, ticketing, and ensuring timely repairs
- Safety training for all employees, plus job-specific safety training and specialized instruction in hazard and risk recognition for specific job functions.

RESOURCE

Glossary

AURA
A data analysis and risk prediction platform used by Nirapon. All partner service providers submit data giving us a holistic view of SMP success. We use the data to identify emerging risk and trends and to plan and target training initiatives.

CAP
Corrective Action Plan – An action plan for a factory specifying the technical and engineering remediation required to bring it in line with the relevant regulatory standards. Factory-appointed consultants are responsible for addressing all NCs identified. It is not the sole responsibility of engineers producing the CAP to observe all matters requiring corrective action. At all times, the owner of the factory is responsible for the safety of the workplace and must instruct consultant engineers accordingly.

CAP Closed Factory
A factory that has completed all remediation work identified in the CAP. The factory 'as-built' drawings have been approved and the factory continues to match the condition of the 'as-built' drawings.

CAP In-Progress Factory
A factory that is actively engaging in technical and engineering remediation to complete a CAP.

Expansion
A building that is additional to the CAP closed building(s). This building is structurally independent of the original CAP closed building(s) but will be linked to the CAP closed building(s) by utilities and some or all engineered safety solutions (eg: a hydrant system, central fire detection system, electrical supply. etc.).

Extension
Addition of a new structure to an existing building. This extended structure will be structurally linked to the original CAP closed factory and will have shared utilities and engineered safety solutions (eg: utilities supply, hydrant system, centralized fire detection and warning system). This extension can be vertical (additional stories) or horizontal (a structure is laterally attached) to a building elevation.

Factory Building of Multiple Businesses or Multiple Occupancy
A factory that occupies a single building but houses two or more businesses (FFC IDs). In such cases the entire building must be considered from both an engineering and safety management perspective, regardless of the sourcing agreement with a Nirapon member. A business boundary cannot be considered as a safety boundary in such cases. In all cases members will be informed when they are being supplied from a building of multiple businesses or multiple occupation. Also see the definition for Locale.

FFC
A portal that maintains information on all factories managed by Nirapon, the Fair Factories Clearinghouse (FFC) is also the system used for all reports that are generated for factories. Members use the FFC to activate factories and view technical and safety management reports about any factory in the database.

FFC ID
A numeric identity for a business registered in the FFC. Each FFC ID covers a business license, not a factory. A building or number of buildings forming a factory may contain one or more FFC IDs.

- **Multiple occupancy** designates several FFC IDs in a single building or factory location.
- **Locale** designates several FFC IDs occupying several buildings at one factory site.

FFC Designations
Requires CAP Development – Member Support Needed: NEW factory under Nirapon member, schedule for TSV; if TSV is not scheduled after one month, change to Contact Nirapon – CAP NOT DEVELOPED – Member Engagement Required

CAP In-Progress: TSV CAP Development conducted; if the factory exceeds agreed time for completion of CAP, change to Contact Nirapon – CAP NOT COMPLETED – Member Engagement Required

CAP In-Progress (Pending): RSC factory with confirmed layout and location, including structures and business update

CAP In-Progress - Managed Factory Under Safety Management Program: Onboarding into Safety Management Program through the Expansion Program

CAP Closed + SMP: Factory is CAP Closed by Alliance or Nirapon and is participating in the Safety Management Program; if factory is not participating in program, factory will be moved to Contact Nirapon – Not Participating in Safety Management Program

CAP Closed + SMP – TSV Expansion/Extension Pending: Factory is CAP Closed but has an expansion/extension that is yet to be added to the CAP

CAP Closed + SMP + Expansion/Extension 1, 2, 3, etc.: Expansion/Extension added to CAP closed factory; if factory is not participating in program, factory will be moved to Contact Nirapon – Not Participating in Safety Management Program

Contact Nirapon: Previously suspended (Alliance) or terminated (ACCORD)

Contact Nirapon – CAP NOT DEVELOPED – Member Engagement Required: Lack of TSV progress due to lack of factory or member engagement and should remain until factory pays for TSV; this may be reinstated if factory delays visit following payment

Contact Nirapon – CAP NOT COMPLETED – Member Engagement Required: TSV CAP Development conducted, but factory has exceeded the agreed time for completion of the CAP

Contact Nirapon – Not Participating in Safety Management Program: Factory not participating in 90-Day reporting process, factory refusing/delaying SSV, and/or factory not submitting live evidence or bulk uploading evidence for six months; designation remains until Nirapon has examined quality of report and submissions

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Factory
One or more buildings (including all ancillary buildings) that form an industrial complex where workers produce goods for supply to Nirapon member companies. These buildings will usually belong to the same employer and share an address, utilities, and engineering services (eg: a hydrant system, electrical systems, gas). They may also share hazardous areas such as chemical storage or a boiler room.

Many factories house multiple businesses (FFC IDs), and some may not produce for Nirapon members. For engineering and safety reasons, all businesses in a factory / industrial complex must be enrolled in the Nirapon SMP or none can participate.

Imminent Danger
Defined by OSHA as: "... any conditions or practices in any place of employment which are such that a danger exists which could be expected to cause death or serious physical harm immediately or before the imminence of such danger can be eliminated."

Impediments to Remediation
Include but are not limited to:

1. The factory is not designed or constructed as an industrial structure or is constructed in a residential area not zoned for industrial use.
2. The structure is at risk of imminent collapse.
3. The factory is a business within a multi-occupancy, multi-tenant and/or multi-industrial building and access to the entire building is not possible or hazardous processes are taking place in the building.
4. The building is rented, and the landlord will not give permission for remediation to take place.

This list is not exhaustive and will include other unforeseen circumstances that could prevent remediation from taking place.

Kirkpatrick Training Evaluation Model
An industry standard, the Kirkpatrick Training Evaluation Model is a comprehensive training evaluation system that assesses training input, its impact on the workforce, how it is applied in the workplace, and the changes/results seen through operational and systems improvements. Nirapon utilizes the Kirkpatrick model to conduct training assessments at factories participating in the SMP.

Life Risk
Any person at risk of harm within a factory site regardless of status or employment capacity, eg: employer, managers, workers, specialist workers, visitors, contractors etc.

Locale
A factory complex or site of two or more buildings that contain two or more businesses (FFC IDs). All FFC IDs at a locale must be included in the Nirapon SMP, as a business boundary cannot be considered a safety boundary.

New Building or New Factory
A building that is completely independent from any other building. This situation would be highly unlikely in an existing factory compound. This criterion is more likely to match the conditions for a newly constructed factory within a new compound.

NC
Noncompliance (NC) describes a technical or engineering issue that needs to be addressed in order for a factory to comply with regulatory standards.

SMP
Our proprietary program, the Nirapon Safety Management Program (SMP) is composed of educational programing, a worker helpline, and safety management system (SMS) support and implementation. The program leverages education, not enforcement, to help factories shift toward a culture of safety management.

SMS
An effective safety management system (SMS) includes proactive safety policies and procedures, a consistent cycle of worker training, and preventative maintenance schedules for all equipment.

SSV
Safety Support Visits (SSVs) are conducted by the Nirapon safety analyst team to 1) quality assure (QA) the 90-day reporting process, follow up on an outstanding issue or helpline call, 3) examine the outcomes of the factory's SMS. The safety analyst team will note areas of good practice and provide feedback on areas that need further development. SSVs focus on education and support, not enforcement.

Technical Change Management
Technical change management occurs when CAP closed factories change their layout, install new internal engineered systems, or add an extension, expansion, or new building within the factory complex. Because these changes require amendments to the 'as-built' drawings, the factory's CAP will need to be updated to meet relevant regulatory requirements. When a factory participating in the Nirapon SMP goes through the technical change management process, a Technical Support Visit (TSV) will be required to assess the updated CAP and approve CAP closure.

Training Assessment
Nirapon uses the four-tier Kirkpatrick Training Evaluation Model to perform training assessments at factories participating in the SMP:

- As part of the TSV CAP closure process, to confirm an acceptable level of trained workers
- As part of an ongoing assessment of CAP closed factories
- To evaluate behavior change in the factory as identified through 90-day reports, helpline call patterns, and SSVs
- To confirm SMP outcomes, such as improved safety management strategies

TSV
A Technical Support Visit (TSV) is designed to examine the engineering safety and construction solutions in place (eg: electrical or fire safety systems) to reduce incidents at a factory.
TSVs occur to:

1. Provide a CAP for a factory
2. Develop a sign-off process for a CAP closed factory undergoing technical change management
3. Follow up on a technical or engineering issue identified by a helpline call and/or SSV

TSV CAP Closure
A technical support visit to a factory to confirm that all remediation has been completed and the factory meets all relevant regulatory requirements.

TSV CAP Development
A TSV to a factory to develop a CAP to bring the factory to regulatory compliance. It is not the sole responsibility of engineers developing the CAP to observe all matters requiring corrective action. The factory owner is responsible for the safety of the workplace and must instruct consultant engineers developing the CAP.

TSV Expansion or Extension
A TSV to a CAP closed factory that has gone through expansion or extension to ensure these additions follow regulatory standards (eg: new sprinklers or a higher-rated fire pump) and to provide updates to the "as built" drawings, if necessary.

TSV Targeted Assessment
A TSV targeted assessment is conducted 1) when a risk critical NC is identified and needs to be remediated and 2) to sign off on the remediation of a risk critical NC.

Workers
All life risk within a factory (eg: owner/employer, managers, workers, specialists, visitors, anyone conducting business within the premises).

5 Appendices

APPENDIX A

SMP Leadership: Nirapon Leadership Team

The Nirapon leadership team consists of a Chief Safety Officer and Director of Operations. This team works with service providers, members, and their factory partners to ensure Nirapon's proprietary Safety Management Program (SMP) is meeting organizational goals and requirements.

The leadership team:

- Represents, interfaces with, and informs members, serving as their main point of contact
- Coordinates with our local partners in Bangladesh to provide service and support to member factories
- Provides monitoring, technical oversight, quality assurance (QA), and quality control (QC) of all safety programs
- Reports progress, challenges, and opportunities to the board
- Oversees helpline calls passed to Nirapon members and corresponding follow-up reports
- Facilitates guidance to factories through Nirapon members or service partner providers following helpline calls, so factories can address safety concerns or technical matters and restore member confidence
- Oversees all activities related to factory training and safety management (including the efficacy of training programs) along with services related to engineering design, remediation, and the corrective action plan (CAP) closure of new facilities.
- Obtains data from partner service providers outlining measures in place to conduct QA and QC for service provision; works cooperatively with each provider to identify any areas for improvement.

APPENDIX B

SMP Support: Nirapon Safety Analyst Team (Dhaka)

The Nirapon safety analyst team is responsible for determining whether factory workers have the knowledge and capability to interact safely with each other and within the factory. To do this, analysts evaluate how factories are implementing policies and procedures, performing risk assessments, and leveraging training and education to keep workers safe.

The team collaborates directly with member factories to provide guidance and facilitate safety reporting, conduct site visits, and assess practices and progress. This team also gives Nirapon members the information they need to support safety management efforts at their partner factories and encourage continuous improvement.

90-Day Guidance and Reporting

The 90-Day Safety Management Guidance and Workbook (90-day workbook) and the 90-Day Safety Monitoring Report (90-day report) are cornerstones of the Nirapon Safety Management Program (SMP). Implemented by the safety analyst team, these tools and processes give factories the guidance and framework to improve safety management themselves, without constant oversight.

90-Day Workbook

The workbook provides factory managers with tips, recommendations, and best practices for running safe, well-maintained workplaces and links to international standards for factory and workplace safety. It is divided into three sections.

Section 1: Safety Management
The first section provides guidelines for developing an annual plan for safety management duties. It outlines responsibilities, key policies, and protocols as well as suggested levels of management oversight.

Section 2: Safety Maintenance
This section outlines best practices for developing and sustaining safe systems through maintenance procedures, including housekeeping and engineering solutions. Section 2 spans a variety of factory types – covering different building sizes and construction methods, number of workers on site, and production processes – but is not exhaustive. Because risk profiles across factories vary, this section stresses the importance of identifying the unique hazards and risks that exist at each workplace and creating maintenance plans to address them.

Section 3: Technical Changes and Updates
This section is only used if a factory makes material changes to:

- building structure, such as expansion or extension, adding production lines, or changing the use of the floorspace
- systems within or outside of the factory
- engineered safety solutions within the buildings that form the factory site

The processes outlined in section 3 are designed to help maintain the integrity of the building and ensure a factory's CAP closure status isn't compromised when systems or structures are changed or updated.

> **The resources in the 90-day workbook can only be utilized effectively if the factory workforce is trained on workplace safety and empowered to achieve it. By pairing workbook guidance with education, a worker helpline, and reporting accountability, the Nirapon SMP provides both the information and the framework factory managers need to develop and implement their own safety management systems (SMSs).**

90-Day Report

The 90-day reporting process enables factory managers to showcase their factory, measure their progress, benchmark success, and provide Nirapon members with a transparent picture of factory safety systems, procedures, and protocols.

Reporting Requirements
Each member factory has a dedicated SharePoint site for reporting. Unlike a static report, the 90-day reporting process is designed to continually capture progress in real time. Factories submit narrative supported by photographic, video, and documentary evidence showing how safety management and maintenance work is being completed throughout each 90-day reporting period.

The safety analyst team reviews each report and provides feedback to factories in a summary report, which is also shared with relevant Nirapon members. Members then follow up with factories to review the report summary and discuss progress and opportunities for improvement.

> **As factory customers, Nirapon members have the leverage and business relationships to ensure their factory partners execute on the reporting feedback. To avoid confusion, Nirapon members do not add requirements or feedback above and beyond what is outlined in the summary report.**

The reporting process strengthens relationships between Nirapon members and their factory partners and builds mutual confidence. Members have ongoing oversight of partner factories and can feel confident knowing factories are operating safely, upholding member values and contractual arrangements, and meeting regulatory requirements.

Positive Feedback

As educators (not enforcers), the Nirapon safety analyst team strives to provide positive, actionable feedback on 90-day reports and following SSVs. We see feedback as a learning opportunity for factories and a chance to inspire change by highlighting best practices, sharing success stories from other factories, and supporting professional development.

Nirapon members strike a positive tone when working with factories as well, which helps build trust and forge productive, trusted relationships.

Safety Support Visits

Safety Support Visits (SSVs) are core to the Nirapon SMP, as well. Our safety analysts conduct SSVs at factories to quality assure the information presented through the 90-day reporting process, experience the factory workplace in real time, and provide on-site guidance.

> **The Nirapon safety analyst team shares their planned schedule of factory visits with BRAC to ensure there are no overlapping site visits.**

The safety analyst team examines safety management and preventative maintenance measures, including those for utilities and equipment – such as boilers, compressors, and generators – along with engineered safety solutions.

The team may also conduct an SSV following a helpline call or if an accident, incident, or unsafe situation has been reported to Nirapon, to help factories address issues and keep them from escalating or reoccurring.

During SSVs, safety analysts focus on helping factory managers understand their roles in workplace safety. The goal is for factory managers to learn to identify hazards and

Technical or Engineering Issues

Nirapon safety analysts focus on managing safe systems and practices within factories – they do not provide technical, construction, or engineering advice. If the safety analyst team identifies technical or engineering issues in a factory during an SSV, they notify relevant Nirapon members, who coordinate with LRQA (formally ELEVATE) to schedule a Technical Support Visit (TSV) and advise the factory to seek advice from its own engineering consultants.

Training or Systems Issues

If safety analysts identify an issue that pertains to training or management systems in a factory, they coordinate with BRAC.

risks and strengthen workplace systems, so they can prevent incidents and accidents. As managers begin to own safety management themselves, our safety analyst team can extend the intervals between SSVs.

Our safety analysts compile SSV results in the Nirapon AURA database system, which helps us identify trends (both positive and negative) and examples of good practice.

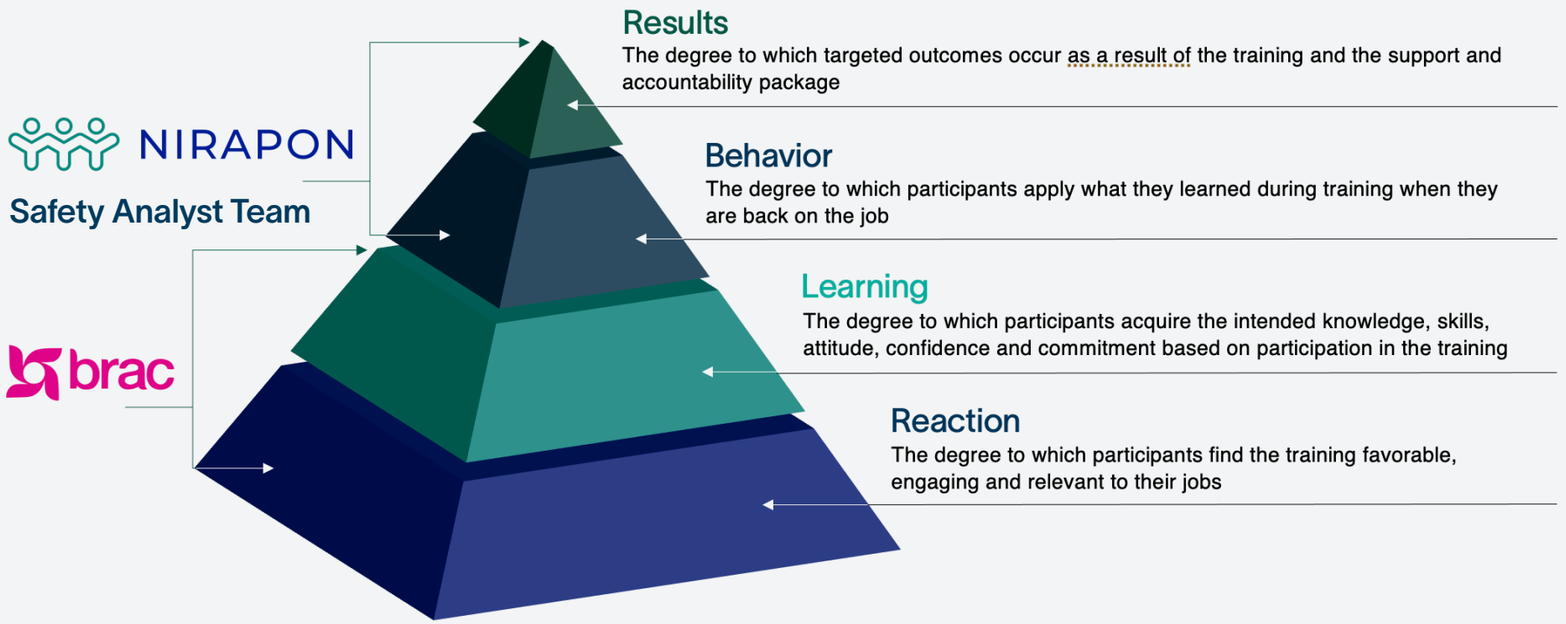
Measuring Success

Through the 90-day reporting process and SSVs, Nirapon safety analysts assess a factory's ability to establish effective schedules and systems while continuously monitoring hazards and risks. They utilize the four-tier Kirkpatrick Training Evaluation Model to evaluate behavior change and subsequent outcomes, as well.*

This work is a marathon, not a sprint. We believe in taking a measured approach to helping factories implement SMSs that will serve them in the long term and help them make safety management a cultural and business priority.

*BRAC, Nirapon's training and education partner, evaluates how successful factories are at engaging in and learning from training safety management training.

The Kirkpatrick Training Evaluation Model



APPENDIX C

SMP Educational Programming: BRAC

One of the Nirapon Safety Management Program's (SMP's) primary goals is to make workforce education part of our member factories' safety management systems (SMSs) and business models. Our partnership with BRAC enables us to implement and activate our education program at the ground level and help factories leverage learnings to build effective SMSs.

BRAC works with member factories to provide:

- **Education** utilizing a train-the-trainer model to build and support a legacy of safety training and management at each factory
- **SMS support** to help factories develop and implement their own SMSs based on the specific hazards and risks they have identified*
- **Assessments** and site visits to measure education program success and evaluate SMS implementation
- **The BRAC education program** provides guidance for effectively implementing the Amader Kotha Helpline in factories, including conducting test calls, providing periodic refresher training, and ensuring that both managers and workers are aware of helpline benefits.

Each factory contracts directly with BRAC to begin this work, which spans three years.

Training and Education

Our Approach: Train the Trainer

Nirapon's education program is designed to build factory capacity and create a sustainable foundation of safety management. BRAC trains factory-based trainers to develop custom, in-house training at each factory. This train-the-trainer model gives each factory a degree of autonomy and self-sufficiency and enables trainers to use examples within the workplace, making training more relevant and applicable.

Worker Safety Committees and Working Groups

Workers are on the factory floor every day. They can be the best resource for preventing factory accidents, as they have first-hand knowledge of hazards and risks. BRAC helps factory management leverage worker knowledge and engage workers in safety management by helping to build and train safety committees and working groups.

A **worker safety committee** can play a key role in helping to develop a factory's SMS. The group works cooperatively to investigate accidents, establish root causes, and make recommendations to prevent reoccurrences.

Responsibilities include:

- Reviewing policies and procedures to identify improvements
- Updating and reviewing risk assessments
- Ensuring the factory's list of hazards is up to date and fit for purpose

In order to be successful, a worker safety committee should have an equal number of managers and workers.

Working groups are made up of specialists with technical knowledge or skills in areas associated with hazards and risks. They the support worker safety committee by providing expertise on specific topics.

*Also part of the Nirapon Safety Management Program, our safety analyst team helps factories identify hazards and risks through the 90-day reporting process and Safety Support Visits (SSVs). Learn more about that process here.

Factory-based trainers facilitate the four Nirapon education programs

- Workers
- Security Guard
- Safety Committee
- Manager

as well as custom training covering topics like hazards, risks, policy, and procedures that are specific to each factory.

They create training plans and schedules – in collaboration with the factory management team, safety committee, and workforce – and continue their own learning through the consistent training they provide.

BRAC reviews each factory's curriculum and monitors training effectiveness, and Nirapon members assess whether the overall training program is being executed successfully.

> **All Nirapon member factories are expected to have factory-based trainers and a safety committee as well as trained managers, workers, and security guards, and every factory employee should receive prescribed workplace safety training that reflects their specific job function.**

Ongoing Training

Nirapon member factories maintain cyclical training programs as part of their business and safety management systems. These include safety procedures, emergency response protocols, and other occupational safety training as required (for example, how to handle chemicals and other hazardous materials).

> **The most successful factories offer training programs on a consistent basis, so workers can meet their annual (at minimum) training requirement at a time that works for them.**

Refresher training for factory trainers is not required if assessments and performance at Levels 3 and 4 of the Kirkpatrick model demonstrate the factory is performing well.

> **Safety management training in member factories doesn't stop with BRAC. In addition to the education program provided as part of the Nirapon SMP, factories need to provide occupational, risk-based training for all workers based on requirements at each site.**

SMS Implementation

In addition to training, BRAC helps factories implement effective SMSs through factory visits and online support. Site visits give factories an opportunity to showcase their work and BRAC the chance to provide guidance in real time, while online support is available when further guidance is required. The goal is to establish an environment where factory management begins to identify prominent hazards and develop controls to mitigate risk. This work builds a foundation for factories to fully embed an SMS into their workplace.

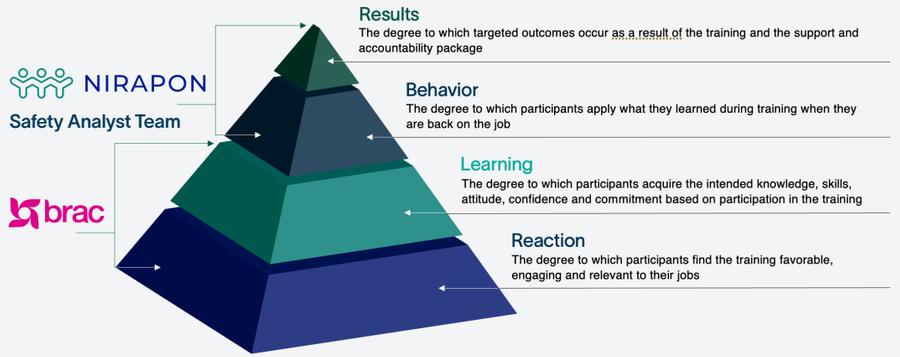
Assessment

The target outcome of BRAC's work is for Nirapon member factories to become and remain self-sufficient in creating and administering their own training programs and safety systems. BRAC continues to measure training and SMS implementation progress by tracking outcomes and success through the Kirkpatrick Training Evaluation Model.

BRAC is responsible for evaluating Level 1 (reaction) and Level 2 (learning) of the model while the Nirapon safety analyst team measures Level 3 (behavior) and Level 4 (results) through Safety Support Visits (SSVs) and the 90-day reporting process.* Building on each other, the assessments show how factory workers improve over time as they engage in learning, apply new skills, leverage the skills to build and implement new systems, and begin shifting behavior and culture.

*This distinction enables BRAC to provide a service that is entirely independent Nirapon's safety monitoring function, which supports transparency and accountability.

The Kirkpatrick Training Evaluation Model



APPENDIX D

SMP Helpline: Amader Kotha

Nirapon contracts with Amader Kotha to provide a helpline for workers in our members' participating factories. A key piece of our Safety Management Program (SMP), this confidential helpline enables factory employees to report safety and other concerns without fear of retribution – and empowers them to take an active role in keeping their workplaces safe.

By escalating concerns quickly and efficiently, the helpline gives factory management a chance to learn from incidents and accidents, avoid reoccurrence, and prevent issues from happening in the first place. And by subscribing to the helpline, factory owners can show their willingness to support occupational safety and health along with transparency in the workplace.

How the Helpline Works

Workers call the helpline if they have tried to resolve a situation with factory management and have not been successful.

> **Representatives from the helpline answer calls from 06:00 to 22:00 on normal business days. Callers who reach the helpline outside of the hours of operation are redirected to an answering service where they may leave a message and receive a return call the following work day.**

Helpline representatives document the problem and report it to:

- The Nirapon safety analyst team
- Nirapon members sourcing from the factory
- The factory

> **The helpline is not an emergency response service. All helpline calls are communicated to relevant parties as quickly as possible via email and according to the established protocol outlined in the Amader Kotha Helpline Protocol on Trakstar.**

Once a concern or incident has been reported by the helpline:

- Factory management has an opportunity to develop an action plan to address the concern or prevent the incident from deteriorating further or reoccurring.
- Nirapon reviews the report and provides members with guidance to help them follow up with the factory and ensure the situation has been resolved.
- The Nirapon safety analyst team may schedule a Safety Support Visit (SSV) to assess the issue on site and work with the factory to address it.

This follow-up process is designed to help factories learn from incidents and accidents, understand how to successfully resolve worker concerns, and improve their safety management systems.

Learning from Helpline Data

Nirapon uses helpline call data to gain a holistic view of member factories as a whole and to predict behavior arcs at specific factories. Our analysts look at behavior patterns, identify trends, and examine emerging risks, so we can help factories proactively address them. The call data also informs our educational programming and contributes to the evolution of the SMP.

The helpline acts in accordance with antitrust guidelines. In all cases, the caller's anonymity is protected.

Call Resolution
Helpline calls will not be deemed resolved by Nirapon until the factory can demonstrate that sustainable, effective management systems – policies, procedures, and other appropriate control measures – are embedded in the workplace to prevent recurrence. Factories should document their efforts to address improvements through the 90-day reporting process.

Helpline Call Scenarios

Call about a defective boiler that was not maintained by the factory.
Result: The call led to the boiler being replaced.
Resolution: Once the factory reported and documented that management had replaced the new boiler and a created a maintenance plan for it, the call was deemed resolved.

Call about a fire in a drying machine that ran continuously.
Result: The factory realized they needed to reduce their production capacity by 12.5% to enable ongoing maintenance on a cycle for all eight drying machines every 24 hours.
Resolution: When factory reported and documented that they had performed maintenance on all of the overtaxed drying machines and scheduled an ongoing maintenance cycle, the call was deemed resolved.

Call from a worker who was getting electric shocks from her machine.
Background: The worker informed three managers of varying seniority that she was getting electric shocks from her machine; they all told her to carry on with her work.
Result: In response to the call, the factory discovered the machine was not bonded to the worktable. The machine generated static electricity, and the worker was grounding the machine.
Resolution: The faulty machine was replaced, but the call was not deemed resolved until the factory developed and documented efforts to shift behavior from a management culture of disregarding worker concerns to one that listens to workers and empowers them to use their voices.

Nirapon Members and Helpline Success

Nirapon members work with their factory partners to help them implement, promote, and utilize the helpline. To take action and support this critical part of the SMP:

1. Require all your in-scope Bangladesh factories to join the Amader Kotha Helpline and cooperate with all related activities and trainings.
- We recommend following up with factories to confirm they have subscribed to the helpline and have given their workforce access to the resource.
- Factories should conduct and document helpline test-call training at least twice a year. We suggest periodically requesting the date of your factory's last test call to confirm they are utilizing the service
- Check in with factories annually to confirm they are using the most current posters and ID cards.

2. Facilitate helpline promotion and communication via relevant third parties such as agents or exporters.

3. Support behavior change in factories by reading all helpline reports and following up to be sure issues have been successfully resolved.
Nirapon will support you in investigating incidents and working with your factories to prevent deterioration or recurrence and to develop longer-term action plans to avoid similar incidents in the future.

Contact:
Amader Kotha Helpline
Doug Cahn

APPENDIX E

Factory Onboarding & CAP Support: LRQA

LRQA (formerly ELEVATE) is an industry leader in sustainability and supply chain services. They design, build, and manage programs that help factories manage risk, achieve compliance, and strive for continuous improvement.

Factories that manufacture product for Nirapon members contract with LRQA to provide the engineering assessments required to onboard as part of the Nirapon Safety Management Program (SMP). The LRQA technical support team works directly with factories to provide Technical Support Visits (TSVs), develop corrective action plans (CAPs), and provide CAP closure service.

The LRQA technical support team does not provide consultancy services. Factories must separately engage engineering consultants to develop and install engineering solutions that address their CAP.

How LRQA Works with Factories

LRQA provides these services and functions for Nirapon member factories, with oversight by Nirapon's Chief Safety Officer.

1. **Onboards new factories**
   Review data and conduct an initial TSV to discover areas of technical and engineering noncompliance (NC) at the factory.

2. **Works with member factories to develop CAPs**
   Create CAPs to address any substantive engineering findings and serve as a project plan to resolve areas of noncompliance.

Note: Guidance on appropriate timelines associated with the completion of such works and any risk information attached to that work will be provided to member brands by Nirapon leadership in consultation with LRQA.

3. **Conducts TSVs for these categories, once the CAP has been established:**
   - **Factory expansion or extension**
     To sign off the addition of an expansion or extension to a CAP-closed factory
   - **CAP closure**
     To confirm a factory's CAP closure, including a training assessment*
   - **Targeted visit**
     To examine (or re-examine) a risk-critical NC, for example:
     1. Remediation that can only be signed off with a site visit, such as a fire pump test or inspection of a new electrical substation.
     2. Sign-off on an expansion or extension to a CAP closed factory, updating the previous CAP to the new "as built" condition.
     3. An technical or engineering issue identified through a Safety Support Visit (SSV) or a helpline call, which presents a significant risk to life and requires remediation.

*Nirapon uses the Kirkpatrick Training Evaluation Model to measure the impact of workforce education and training. You can learn more about how we leverage this evaluation model across the SMP in Appendices B and C.

4. Follow-up and sign off on the technical engineering remediation work identified through an SSV or helpline call.

Note: These visits are made available at an additional cost to the factory, and cost varies based on the purpose and scope of the visit as well as the size of the factory.

4. **Documents TSV findings and report them to Nirapon**
   LRQA documents TSV findings through narrative and visual evidence (photos and videos) and shares findings with the factory and relevant Nirapon members.

Nirapon members can support and encourage CAP closure by following up with factories after TSVs to be sure thorough, successful remediation is being done.

Technical Support Visits

TSVs examine the physical systems in place to mitigate incidents and accidents at a factory. These include things like engineering and construction solutions, such as fans, fire doors, structural supports, and electrical systems, as well as passive and active firefighting measures. Through TSVs LRQA discovers areas of technical and engineering NCs and documents them for the factory.

TSVs encompass:
- Targeted assessments
- CAP development
- CAP closure
- Factory expansion or extension

Desktop Review
LRQA contracts directly with Nirapon member factories to assess engineering hazards and risks through TSVs. At all times, LRQA will use the desktop review process to help reduce costs for the factory. The technical support team will conduct an engineering assessment of design drawings and documents that reflect the "as built" condition of the factory and make a determination about the factory's likelihood of achieving CAP closure. This process is designed to support the factory, allow their consultants to correct issues with the drawings or the building itself, and reduce costs by avoiding the need for follow up TSVs.

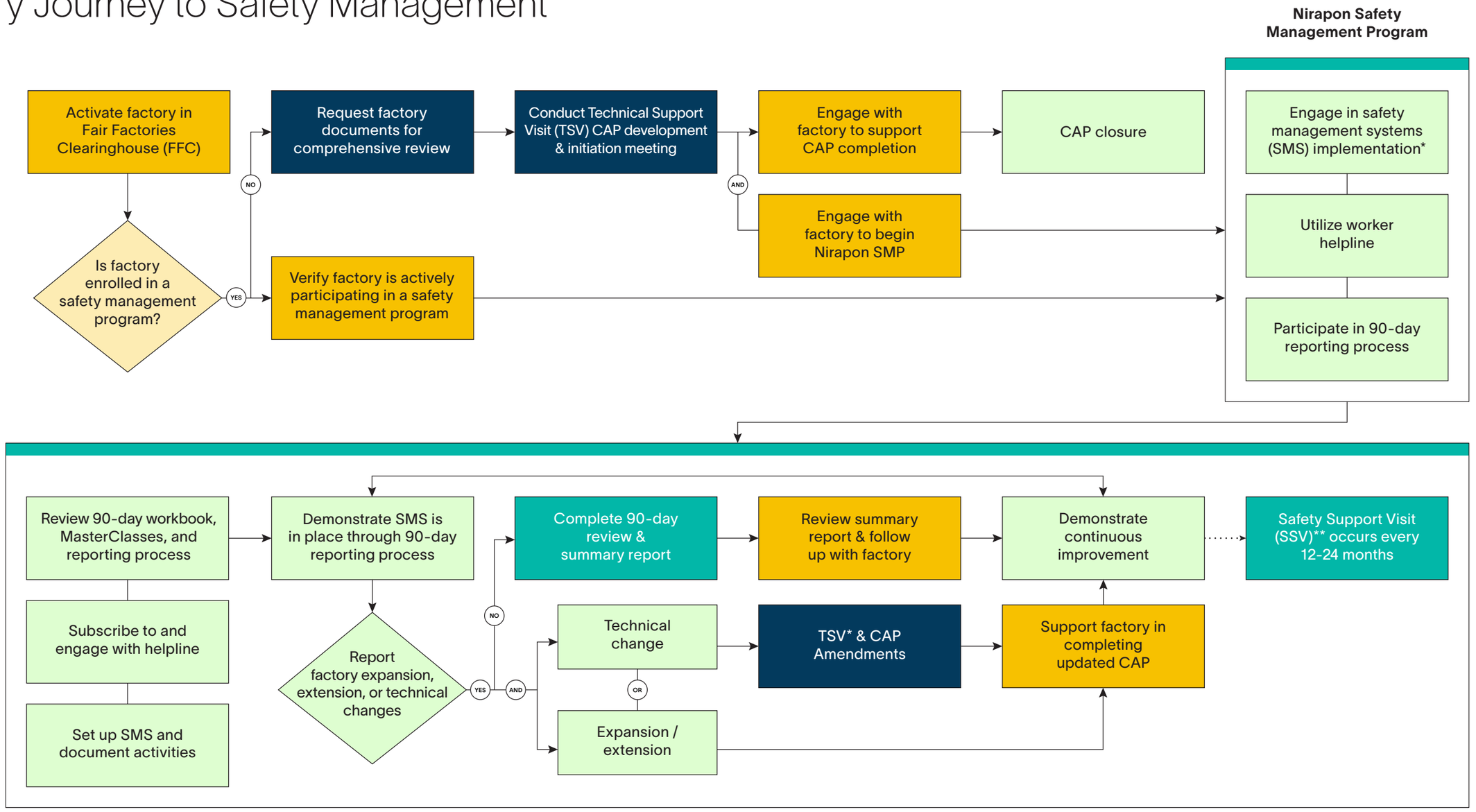
Not every factory is a fit for the SMP

During an initial factory assessment, the LRQA team may discover impediments to remediation that disqualify a factory from participating in the Nirapon SMP.

A business boundary within a broader safety or engineering boundary
A fire or chemical spill knows no boundaries. If a factory is part of a multi-occupancy building or complex of buildings, and other occupants are not willing to comply, we cannot assess or affect safety management.

Uncommon or unfamiliar hazards and risks
If factories – particularly those outside of traditional RMG manufacturing – contain hazards or present risks that Nirapon is not equipped to help them navigate, we cannot effectively assess safety or management practices.

Factory Journey to Safety Management



*Paid for by factory. **SSV will not be scheduled/conducted before CAP Closure is achieved

MEMBER LRQA FACTORY NIRAPON TECHNICAL SUPPORT TEAM

Corrective Action Plans

A CAP specifies the technical and engineering remediation required to address areas of NC and bring a factory in line with relevant legislation and regulatory standards. A factory achieves CAP closure when it has successfully accomplished all necessary remediation and is in full compliance.

> **As the employer, the factory owner is legally responsible for worker and workplace safety. It is the owner's responsibility – not LRQA's or Nirapon's – to work with their own engineering consultants to identify and resolve all NCs at the factory.**

Based on findings from the TSV, LRQA's technical support team helps factory management develop CAPs and take the steps needed to close them. In parallel, the factory will begin implementing the Nirapon SMP. This gives factory workers a compliant, safe structural environment in which to learn about safety management, report their progress, and begin building their own SMS.

> **CAP closure is a snapshot in time not a final achievement. To remain CAP closed, factories need to maintain systems, machinery, and engineered safety solutions while striving for continuous improvement.**

Factory Extension and Expansion

The physical layout or production capacity of a factory may change over time due to business growth, shifts in the manufacturing process, updates in technology or production techniques, and other factors. These kinds of changes require assessments to be sure everything from electrical systems and load management to engineering and construction solutions are up to code.

Members should encourage their partner factories to hire engineering consultants whenever they are considering layout or capacity changes to be sure they are following relevant regulations and remain compliant.

Any expansion or extension work usually requires LRQA sign off in order to update the CAP to reflect the factory's "as built" condition.

LRQA Supports Technical Change Management

If during the course of the SMP the Nirapon safety analyst team, the helpline, or a factory worker identifies a technical or engineering issue that needs to be addressed at a member factory:

1. They notify the LRQA technical support team, which will also alert Nirapon, if necessary.
2. The factory's engineering consultants or on-site engineers need to resolve the issue.
3. LRQA will conduct a TSV to sign off the updated engineering solution and update the factory's CAP closure status.

If a factory has been previously suspended (under the Alliance) or terminated (by the Accord), they cannot participate in the Nirapon SMP until demonstrating that all engineering remediation set out in their CAP at the time of suspension or termination has been successfully completed.

These factories can work with LRQA to resolve outstanding issues and achieve CAP closure. In parallel, they can also begin the Nirapon SMP.

Nirapon Member Involvement

CAP closure can be a lot of work for factories. When Nirapon members are invested in the process and set business expectations around CAP closure, factories strive for and invest in it, too.

Members that follow up with their partner factories for progress updates, encourage achievement, and celebrate successes build strong relationships with factories – and inspire factory management to continually improve safety in the workplace.

> **Nirapon leadership, members, and LRQA are deeply invested in helping factories become safe workplaces. That said, workplace safety is a legal requirement, first and foremost, and factory owners are responsible for compliance.**

Standards and Legislation

For initial assessments of new factories that have not previously been part of any remediation program, LRQA refers to the current standards set out in the Bangladesh National Tripartite Plan of Action, which includes legislation, codes, and industrial practices. Legislation or regulations will not be applied retrospectively, but the most recent legislation applies to all expansions or extensions. Additionally, a building that has not previously been part of a safety program must be remediated (when necessary) to current legislative standards in order to join the Nirapon SMP.

For all other factories Nirapon members will refer (as appropriate) to Bangladesh National Building Code (BNBC); International Building Code (IBC); National Fire Protection Association (NFPA) Regulations; and International Electrotechnical Commission (IEC) Regulations as well as relevant best practice risk management protocols as set out in OSHA, HSE, and other safety regulatory bodies globally as it pertains to the management of safety and the control of industrial hazards and risk.

- **BNBC**
  Bangladesh National Building Code
  dpp.gov.bd

- **BNTPA**
  Bangladesh National Tripartite Plan of Action

- **IBC**
  International Building Code

- **IEC**
  International Electrotechnical Commission

- **HSE**
  Health & Safety Executive (UK)

- **OSHA**
  Occupational Safety and Health Administration (USA and Canada)

- **NFPA**
  National Fire Protection Association

For more information, click here.

Contact Md. Shayekh Zubayer or Mehdi Hasan Khan for questions about Technical Support Visits.

It is not the sole responsibility of LRQA engineers producing the CAP to observe all matters requiring corrective action. The factory owner is responsible for the safety of the workplace and must instruct consultant engineers accordingly.

LRQA does not represent the Nirapon member in contractual arrangements between Nirapon members and factories.

All work will be signed off as complete (CAP closed) by the Nirapon CSO as the safety representative of the Nirapon members.

NIRAPON