



WORKPLACE STANDARDS COMPLIANCE

Guidebook



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REQUIREMENT 1: Compliance with the Law

Key Requirements

Compliance with the Law requires that all vendor and factory partners:

Know all applicable legal requirements and the requirements of this Program.

Track legal and regulatory changes specifically relating to minimum wage, working hours, holidays, benefits, child labor, health and safety, forced labor, harassment or abuse, discrimination, freedom of association, environment, and factory security.

Ensure that the factory operate in compliance with the law and the requirements of this Program.

Indicators of Noncompliance

- Willful violation of the law or requirements of the Wahl Clipper Workplace Standards.
- Systemic violations of the law or requirements of this Program.
- Unfamiliarity with legal or Program requirements.
- Isolated or technical legal violations.

Good Management Practices

- The factory identifies and maintains copies or summaries of all applicable local laws.
- Factory maintains all necessary records and required permits related to the operation of the factory.
- Factory designates management representative(s) to have responsibility for ensuring that the factory complies with its legal obligations and the requirements of the Wahl Clipper Workplace Standards.
- The factory cooperates with enforcement officials responsible for reviewing compliance practices.
- The factory periodically reviews work rules and employment handbook to ensure that they comply with current law.
- The vendor/factory periodically monitors compliance.
- The factory conducts training on legal as well as the Wahl Workplace Standard requirements with appropriate staff. The factory ensures that its rules and employee handbook comply with the law and the Wahl Workplace Standard.
- Finally, the factory promptly takes remedial and disciplinary action for any unethical/illegal conduct.

REQUIREMENT 2: Voluntary Labor

Key Requirements

Forced/Slave Labor, Human Trafficking strictly prohibits the use of indentured, bonded, prison labor, or any other practices that create an unreasonable legal or practical limitation on a worker's ability to leave his/her employment. This requirement stipulates that vendor and factory partners adhere to the following:

- Factories may not create unreasonable legal or practical limitations on a worker's ability to leave his/her employment at their own discretion. Examples include 1) a labor contract that requires the payment of "excessive" fees upon entering employment, or 2) the payment of a penalty upon termination of a labor contract.
- Fees associated with a labor contract may not be more than the amount legally permitted by the applicable law of the host or home country. In the absence of such law, fees may not be substantially above the prevailing market rate.
- Bonded labor where work is done to pay off a debt is strictly prohibited. This is still prevalent in parts of South Asia where migrant workers are forced to take on the burden of repayment of debt through labor.
- Factories must provide an individual locker for each worker to store personal items which may include:
 - original government-issued identification, passport, work permit or other personal documents.
- Compulsory overtime is considered forced labor (please refer to: Working Hours). The factory may not impose unreasonable restrictions on worker movement in the factory and, where applicable, the factory compound or worker dormitories.
- Workers are free to refuse to perform certain tasks that the worker believes to be hazardous without penalty of termination.

Indicators of Noncompliance

- Involuntary and/or uncompensated labor.
- Workers imprisoned/locked in factory.
- Use of bonded, indentured, or prison laborers.
- Withholding a worker's original government-issued identification, passport or work permit, even if the worker has provided written consent.
- Required and excessive overtime hours. All overtime must be voluntary.
- Withholding worker wages or deposits until completion of the contract.

- Unreasonable restrictions on movement.
- Contracts for migrant workers are less favorable than those provided to local workers. Supervisors use their position of power to intimidate or threaten workers
- Female migrant workers are threatened with unfavorable contract terms unless they accept the sexual advances of a supervisor/manager.

Good Management Practices

- The factory establishes a written set of instructions for all subcontractors and labor recruiters which prohibits the use of forced labor, trafficked persons, or slave labor.
- Factory management eliminates all unreasonable restrictions on the movement of workers in the factory and dormitories.
- Labor contracts do not contain penalties for terminating employment.
- All workers are voluntarily present. No workers are imprisoned or locked in the factory.
- No policies exist which restrict the workers' right to leave – whether that is the end of shift or to terminate employment.
- No locked gates or doors are used which prevent workers from exiting.
- The factory should pay all costs related to hiring migrant workers, including recruitment and travel fees.
- The factory provides lockers for each worker to store personal property, original government-issued identification, passport, or work permit.
- If migrant workers are part of the workforce, supervisors are provided training in professionally and fairly managing a culturally diverse workforce. Migrant workers are provided with basic needs including items for daily hygiene, and the ability to regularly communicate with their family in their home country.

REQUIREMENT 3: Child Labor

Key Requirements

Child Labor sets the expectation that all vendor and factory partners:

- Comply with all applicable laws governing minimum working age. If set at or below 15, then no one under 15 is permitted to work. If set above 15, then no one under the age established by law may work in the factory.
- Comply with all legal restrictions placed on “young workers.” In many countries, these restrictions include the number of overtime hours, hazardous work and/or night work, as well as a medical fitness certificate and/or annual medical checkup.
- Take all necessary precautions to ensure that workers under the age of 18 are protected from working conditions likely to endanger their health, safety or welfare.

Indicators of Noncompliance

- Use of workers under the host countries’ legal minimum age.
- Minors or “Young Workers” (workers under 18 years of age) working in hazardous positions, past legal limits or in violation of applicable law.
- Historical child labor (i.e., workers hired prior to legal working age).
- Children present in the factory but not working (except in approved separated childcare facilities).
- Insufficient hiring procedures to ensure compliance.
- Incomplete or missing age documentation records verifying the age of all workers at the date of hire.

Good Management Practices

- The factory has hiring policies and procedures that ensure that the minimum age of workers corresponds to all local laws and Wahl Clipper Corporation Workplace Standards.
- The age of each worker is verified prior to his or her employment.
- Updated personnel files are maintained for each worker. Such files have copies of basic worker information such as an identification card, birth certificate, passport or other documentation. In countries where official documents are not available, the factory must use an appropriate and reliable method of assessment, which must be documented. (see A-29)
- Factory maintains a list of workers who by age are restricted to certain hours and operations. The factory ensures that these workers are not working beyond the restricted hours or in hazardous positions.

- The factory creates production line(s) with young workers with limited hours and nonhazardous duties.
- The factory encourages young workers to attend night classes and participate in educational programs.
- When employed at night, factory ensures safe transportation for young workers and provides opportunities for adequate rest.

REQUIREMENT 4: Freedom of Association

Key Requirements

Freedom of Association ensures workers are free to organize and join legal workers' organization without discrimination or interference and to engage freely in collective negotiations to regulate the terms and conditions of employment.

This Program requirement prohibits vendor and factory partners from:

- Worker discrimination for engaging in collecting bargaining activities and other worker committees.
- Unlawfully interfering with workers' ability to exercise their right to associate or join legal organizations of their own choosing.
- Threatening, disciplining, punishing, or firing workers because they exercise this right.
- Refusing to hire workers because of their associations.
- Affirmatively seeking the assistance of state entities to interfere with this right.
- Participating in "blacklisting" of union organizers by providing their names and details of their activities to other employers, or to employers' associations.

When attempting to form a union, workers are not permitted to:

- Coerce other workers to join a union and/or participate in organizing activities.
- Advocate union organization in a time, place or manner that interferes with individual workers' rights not to participate in union activities.
- Coerce management to accept agreements advocated by workers or unions.
- Engage in organizing efforts in a manner that interferes with other workers' ability to perform their duties, except under a legally recognized work stoppage.
- Engage in organizing efforts that intimidate other workers.

In countries where only state-approved workers' organizations are permitted, Wahl Clipper Corporation vendors and factories:

- Are not required to recognize illegal workers' organizations.
- Should not, to the greatest degree possible, permit direct government interference in workers' right to associate.
- Should seek to find appropriate and legal mechanisms through which workers can effectively express workplace concerns to management. These include: developing labor-management committees, making space for informal workers' groups to meet, or conducting employee surveys to promote harmonious, productive workplace conditions.

Indicators of Noncompliance

- Actively interfering with worker attempts to organize.
- Policy of refusing employment to union members.

Good Management Practices

- Providing workers the right to associate freely and to bargain collectively.
- The factory has a written policy which states that workers have the right to lawfully form unions or similar organizations which give them the opportunity to address worker grievances and workplace issues collectively.
- The factory does not discriminate, penalize, threaten, restrict or interfere with workers choosing to lawfully form or join unions or associations.
- The factory recognizes and bargains in good faith with legally formed unions.
- The factory implements systems to establish better worker and management relations such as Health and Safety Committees.
- The factory has formal communication channels such as suggestion boxes so that workers have opportunities to raise issues of concern and to have those issues addressed by management.

REQUIREMENT 5: Discrimination

Key Requirements

Discrimination ensures that each worker is treated with respect and dignity and is judged solely based on the worker's ability to perform the job. This requirement:

- Applies to all employment decisions, including recruitment, hiring, training, promotion, termination and retirement.
- Prohibits discrimination based on legally protected criteria such as gender, race, age, disability, nationality, or cultural beliefs.
- Requires that training, development, promotion and advancement of opportunities be provided to all workers, whether full time, part time, short-term, permanent, or with any other contracts of employment.
- Ensures factory does not question prospective workers about their pregnancy status and that pregnancy tests are not conducted before hiring or as a pre-condition to employment.

Indicators of Noncompliance

- Pregnancy testing.
- Hiring practices that require applicants to divulge maternity status.
- Termination or disciplinary procedures taken against workers for personal characteristics.
- Targeting groups for certain types of jobs.
- Variations in pay, benefits or advancement based on personal characteristics.
- Reduction in wages or pay for workers who return after pregnancy.

Good Management Practices

- The factory actively recruits and employs qualified candidates from the local population at all levels of the factory.
- The factory has a written policy on discrimination that is consistent with the Wahl Clipper Corporation Workplace Standards discrimination policy and ensures that it is followed.
- The factory creates written job descriptions that focus solely on "occupational qualifications," not personal characteristics.

- The factory periodically reviews hiring practices to ensure that all have the opportunity to apply and that they are in compliance with the Wahl Clipper Corporation Workplace Standards and local law.
- Workers are not treated differently based on personal characteristics such as age, gender or pregnancy status.
- The factory ensures that workers are paid wages and benefits without regard to gender, nationality, race, color, religion, age, maternity or marital status.
- The factory provides equal support to all workers in promotions to supervisory positions.

REQUIREMENT 6: Disciplinary Practices

Key Requirements

Disciplinary Practices strictly prohibits vendor and factory partners from:

- Physical contact intended to hurt or harm a worker.
- Any comments suggesting threats of behavior to harm a workers physical or psychological wellbeing.
- Discipline resulting in the withdrawal of basic physical comforts provided to other workers.
- Comments or behavior which is reasonably understood by the worker to be threatening or demeaning.
- Supervisors touching workers in any way that could be considered to have sexual implications.
- Sexual comments made to workers that would be considered to create a hostile work environment.
- Requiring any form of sexual favor in exchange for beneficial treatment in employment, or as a condition of maintaining employment.

Indicators of Noncompliance

- Physical punishment or abuse.
- Unreasonable security searches.
- Verbal harassment such as yelling.
- Restricting access to toilets/drinking water.
- A history of verified complaints involving physical, sexual, psychological or verbal abuse.

Good Management Practices

- The factory has established and implemented a progressive disciplinary system that includes verbal warnings, written warnings, suspension, and finally, termination as a way of disciplining workers.
- The factory ensures that all disciplinary actions are clearly documented and recorded properly (see A-29).
- Workers are not subject to corporal punishment or abusive disciplinary practices.
- Factory has a written policy, which defines rule infractions, and what the disciplinary actions are for each infraction.

- The factory has established an upstream communication system or suggestion box where workers can raise issues of concern including treatment by their supervisors.
- The factory trains supervisors and production workers upon hiring and on an ongoing basis, (i.e. quarterly).
- The factory keeps records of disciplinary actions taken, include the written acknowledgement from workers that they were informed of the disciplinary action and any consequences that may result from further rule infractions (see A-29).
- The factory has a written policy that outlines that harassment is unacceptable and what behaviors (such as those listed above) will not be tolerated.

REQUIREMENT 7: Working Hours

Key Requirements

Working Hours requires that all vendor and factory partners:

- Comply with the legal requirements and limitations on regular and overtime hours or obtain approval by the local labor bureau/ministry for an extension (not to exceed the limits specified in the Appendix) (see A-28) and maintain documentation to demonstrate compliance.
- Ensure one day off in seven is provided or workers are provided another day of rest during the next week.
- Ensure that workers are given notice in advance that overtime hours may be necessary.
- Provide overtime compensation at the rate required by local law for all workers, including piece rate workers.

Indicators of Noncompliance

- Inconsistent time records.
- Total working hours (regular and overtime) beyond 60 in a week during non-peak production seasons and beyond 72 in a week during peak production seasons.
- Denial of legally required holidays, rest days and vacation leave.
- Non-payment for actual time worked.
- Systematic denial of mandated meal and rest breaks.
- No time records or system to track working hours (see A-29).
- Broken time clock or not capturing all hours worked (no time out records).

Good Management Practices

- The factory maintains an accounting system that ensures that all workers are paid for overtime in accordance with the premium pay.
- The factory ensures that piece rate workers are aware of the requirement that they be paid a premium rate for overtime work.
- Workers are provided with pay slips that clearly indicate overtime hours and overtime compensation. (see A-29)
- Workers are not required to work more than the standard workweek established by law.
- The factory workweek is the same as that mandated by law.
- The factory provides a worker manual/work rules that define breaks, rest periods and days off provided.

- The factory ensures that the workweek does not change from week to week and that all workers are aware of the work schedule.
- The factory defines, according to local law, the different types of overtime: workdays, weekends, holidays and corresponding pay rates.
- The factory finds good management solutions, such as hiring additional help during peak periods, to ensure that overtime hours are in accordance with the above standards.
- The factory includes in the personnel policy and labor contracts, if applicable, that workers have the right to refuse overtime, with no repercussions, and does not issue fines for refusing overtime.
- The factory implements a system, such as a sign-up sheet, for workers to volunteer for overtime.
- The factory ensures that working hours do not exceed 60 per week during non-peak production (8 months out of 12) and that working hours do not exceed 72 in a week for peak production months (no more than 4 months out of 12).
- The factory posts the operation breakdown and piece rate on the production floor so that workers are aware of pay rules and targets in advance.

REQUIREMENT 8: Wages and Benefits

Key Requirements

Wages and Benefits for factory workers clearly stipulate that:

- All workers are paid not less than the legal minimum wage applicable in the country of manufacture.
- In addition to wages for the standard workweek, workers must be compensated for overtime hours at the legally or contracted mandated premium rates.
- All workers shall be provided with written and understandable information about their employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- Although it is preferred that factories use a disciplinary process that does not include fines, fines may be used if all the following conditions are met: permitted by local law, reasonable in nature, and part of a progressive disciplinary process.
- In addition, legally prescribed benefits are also provided in accordance with the law.
- For apprentice/trainee programs, factories are further required to adhere to any legal requirements governing specific limits on number of hours worked, duration of training period and the number of times the same worker can be classified as a trainee. Further, in some cases, apprentice programs provide for payment below minimum wages for the period of training. Limits on the duration of the training period must be strictly followed and wages must be raised to normal pay rates at the end of the training period.

Indicators of Noncompliance

- Inconsistent pay records.
- Non-payment of applicable wages.
- Minimum wage and overtime violations.
- Willful manipulation of payroll.
- Not providing legally required benefits.
- Illegal or unauthorized wage or benefit deductions.
- Compensation not paid directly to workers.
- No system to track hours worked.
- Failure to pay worker mandated withholdings to the appropriate government agency.
- No pay slips provided to workers (see A-30).
- Isolated late payment of wages.
- Isolated miscalculation of wages (i.e. computer/human error).

- Incomplete payroll records.
- Deductions from wages for disciplinary infractions.

Good Management Practices

- Workers are compensated for all hours worked in accordance with the law. All overtime hours are compensated at the premium wage rate established by law.
- The factory has a base wage that is at least the lawful minimum wage.
- All workers (regular, trainees, and contract) are paid at least this base wage.
- The factory has a system that shows wage rate increases based on seniority and productivity.
- The factory posts a simple written description of how pay is calculated and workers are given this description upon hiring.
- All workers receive pay slips that show gross and net wage calculations and applicable deductions (see A-30).
- The factory has workers maintain their own time cards and wage slips.
- The factory has time clocks or other comparable automated method for tracking working time and calculating pay.
- The factory educates workers on their pay, production bonuses, and what deductions are removed from workers' pay.
- The factory outlines what benefits are available to workers and instructs workers on how benefits are accessed.
- The factory ensures that workers know what paid leave is due them.
- The factory has an established pay schedule that is strictly adhered to.
- The factory maintains records of payroll, which show that workers are being paid the applicable overtime rate.

REQUIREMENT 9: Health and Safety

Key Requirements

Health and Safety requires that all vendor and factory partners:

- Take all necessary precautions to ensure that workers under the age of 18 are protected from working conditions likely to endanger their health, safety or welfare.
- Provide workers with a safe and healthy work environment and effectively manage such risk areas as toxic substances and dangerous machinery.
- Prevent accidents or injuries in the workplace and provide appropriate protective equipment.
- Comply with all local legal regulations and the requirements of the Global Compliance Program.
- Provide a safe living environment for workers, and comply with all legal regulations regarding residential facilities, where provided.
- Adhere to the specific requirements spelled out in the Guidelines (see A-18).

Indicators of Noncompliance

- Blatant health and safety risks are poorly managed.
- Clear worker endangerment.
- Denial of appropriate medical care.
- Structurally unsafe buildings.
- Blocked, locked, or no emergency exits.
- No secondary exits.
- Immediate fire hazards - (e.g. frayed electrical wiring, open flames, etc.).
- No accessible firefighting equipment.
- Insufficient, inadequate, or expired fire extinguishers.
- Unsafe worker exposure to hazardous chemicals or substances.
- Worker dormitories located above production building.
- Failure to have adequate machine guards or personal protective equipment.
- Insufficient width of fire exits and evacuation routes.
- No evacuation plan or signage.
- Poor or inadequate ventilation, lighting and temperature controls.
- Missing or inadequate first aid supplies.

- Unsanitary or insufficient toilets or canteen areas.
- Routine building and machine maintenance not performed.
- No fire drills.
- No or unsafe drinkable water.

Good Management Practices

- The factory has a written Health and Safety plan that indicates how all Health and Safety issues are being managed at the factory. The plan includes what steps the factory is taking to ensure that health and safety risk areas are being identified and addressed.
- The factory has a health and safety manager to oversee compliance
- Health and safety education is provided to all workers during initial orientation and on an ongoing basis.
- Workers are trained on how to operate machinery in a safe and effective manner.
- Fire and emergency evacuation drills are conducted for all building levels every 12 months and overseen by fire authority, followed by documentation of the drill.
- Enough workers are trained in administering first aid and in handling fire emergency equipment.
- Outside health and safety professionals are consulted for guidance and evaluation on existing practices and performance.
- Factory provides on-site medical assistance.
- The factory follows the specific advice outlined in the Supplemental Guidelines document (see A-18).
- Workers who have removed themselves from a work situation, that they reasonably believe presents an imminent and serious danger to their health, are protected from undue consequences.
- The factory provides workers with adequate information, in the language of the workers, on measures taken by the factory to manage health and safety.
- The factory consults with workers periodically on health and safety issues and how best to effectively manage them.
- There is supervision, at suitable intervals, of the health of workers exposed or liable to be exposed to occupational hazards due to air pollution, noise or vibration in the working environment. Such supervisions could include periodic medical examinations.
- All workers concerned are adequately and suitably informed by the factory of potential occupational hazards in the working environment due air pollution, noise and vibration, and are instructed in the measures available for the prevention and control of, and protection against those hazards.

- The factory must have a fire safety committee made up of employees, management and representative from high hazard areas. Meetings must be documented and take place every 60 days.
- Uncontrolled smoking is forbidden inside any facility including dorms and canteen. Smoking is only permitted in specially designated smoking areas equipped with proper fire protection and ventilation.
- Childcare facilities are located on the ground floor or in a separate non-industrial facility.
- Facilities and buildings are inspected on a routine basis each month by trained personnel to ensure that all the fire safety standards are met in this document and specific retailer requirements. If any requirements are not met, facilities and buildings are to be inspected daily until the facility meets all the outlined standards. Records of all inspections must be maintained for audit purposes.
- Facilities should have a documented electrical maintenance program. The program should include at a minimum the routine inspection of electrical system of the building for damaged wires, separate conduits, improper installations, and overloaded/damaged circuits. The facilities should ensure that extension cords are not being utilized for permanent application and that multiple outlet adapters or “surge protector strips” are not being connected to each other.
- The facility shall implement an annual infrared scan program for all electrical equipment (including panel boards, wiring and equipment) to identify and mitigate any potential ignition sources.
- Facilities provide access for fire department vehicles and other fire-fighting equipment in the facility premises. This includes, but not limited to, ensuring that fire department vehicles are able to reach the facility by road or a cleared path and firefighters have easy access to water sources, the fire sprinkler system and gas cutoffs if they exist.

REQUIREMENT 10: Environmental Requirements

Key Requirements

Environmental Requirements specifically attempts to ensure that Wahl Clipper Corporation's vendor and factory partners do not violate any local environmental regulations. To ensure that environmental legal compliance is maintained, Wahl Clipper Corporation encourages vendor and factory partners to:

- Appoint a worker responsible for implementing and maintaining the factory's environmental management system.
- Periodically review existing environmental management systems by performing a factory walkthrough looking for potential environmental hazards and how they are being managed.
- Ensure that waste is disposed of properly by licensed vendor and that waste disposal systems effectively manage environmental risk.
- Ensure that all applicable environmental certificates are up to date.
- Develop environmental management practices with respect to water and air quality, water and energy efficiency and waste reduction.

Indicators of Noncompliance

- Willful violation of environmental legal requirements.
- Dangerous pollutants exposed to workers and/or local community.
- Inappropriate storing/handling of chemicals (see A-22 and A-27).

Good Management Practices

- The factory complies with all environmental legal requirements.
- All applicable environmental regulations are identified and kept on file.
- All required permits and necessary records including wastewater permits, emission permits, water testing records, waste disposal records, factory inspections, and any other records which relate to environmental concerns are maintained on site.
- The factory appoints a designated worker with responsibility for overseeing compliance with environmental regulations.
- The factory has a written environmental management plan that details how these issues are addressed. The plan includes items such as description of worker responsible for implementing, a description of the environmental impact of the production processes, governmental permits and records necessary, government agencies responsible.

- The factory's management staff attend environmental management conferences and speak with other contractors to learn of ways to minimize the use of materials and reduce impact on environment.

Appendix

Health and Safety

Supplemental Guidelines

The bolded items below are minimum requirements based on international health and safety guidelines. In addition, all factories must comply with the specific legal requirements governing health and safety in the countries that they operate. All other items listed below are suggestions or good practices adopted by “model” factories.

1. Health and Safety Plan:

- Factory has fire and emergency evacuation plans and diagrams posted in local language in various locations around the factory. The plan illustrates critical information such as emergency evacuation routes, “you are here” mark, correct layout direction with assembly gathering point posted outside at safe distance, location of fire extinguishers and hydrants, and instructions in local language of what to do in the event of an evacuation.
- If legally required, factory has a written health and safety plan that indicates how the factory is managing safety and health issues. The plan, with a special attention to minors and pregnant workers, includes roles and responsibilities of personnel and on-going activities necessary to ensure that a safe and healthy workplace is provided. As well as the steps the factory is taking to ensure that health and safety risk areas are being identified and addressed. Facilities provide and document training in the facility’s emergency action plan for all personnel every 12 months or more frequently if required by legal regulations.
- Factory has a written personal protective equipment (PPE) policy which describes workplace areas and what PPE should be used, worker responsible for PPE program, where the PPE is stored, how it is distributed, and how training is performed.
- Factory has a written policy on chemical usage at the factory that includes an inventory of what chemicals exist, quantities stored, where stored, how handled, and training of personnel. Safety Data Sheets (SDS) exists for all chemicals used in the factory.
- Factories take all necessary precautions to ensure that workers under the age of 18 are protected from working conditions likely to endanger their health, safety or welfare.
- Factories provide workers with adequate information, in the language of the workers, on measures taken by the factory to secure occupational health and safety.
- Factory consults with workers periodically on health and safety issues and how best to effectively manage it.
- Workers who have removed themselves from a work situation that they reasonably believe present an imminent and serious danger to their health are protected from undue consequences.
- There is supervision, at suitable intervals, of the health of workers exposed or liable to be exposed to occupational hazards due to air pollution, noise or vibration in the working environment. Such supervisions could include periodic examination
- Facilities must have emergency response personnel (identified, trained, and present) for each floor, building and shift who will oversee evacuating the building in the event of a fire emergency.

- Hazardous liquids, flammable chemicals, and combustible materials are kept away from ignition or heat sources and are not stored on the roof of the facility. These materials shall be stored in approved containers in a designated storage area and/or flammable liquids storage cabinet. Anti- static containers and fire extinguishers should be readily available in areas where such materials are stored. All liquids or materials maintained outside the designated area should be limited in the amount necessary for one shift or 8 hours maximum. Only staff that has been trained in proper handling and is authorized is permitted to handle these materials.
- Facilities shall maintain valid fire licenses or permits as mandated by law. If required by law they shall be posted in a visible location.
- Facilities shall maintain valid construction approvals as mandated by law. If not required by law a certified third party civil or structural engineer that the facility is structurally sound must be obtained.

2. Fire Extinguishers:

- Factory has the correct types of extinguishers for various types of materials present:
 - Class A for ordinary combustibles: wood, paper, and textile fires
 - Class B for flammable liquid, gas or grease: solvent, grease, oils, petroleum
 - Class C for electrical: electrical equipment fires
 - Class ABC for any of the above
 - Class D for combustible metals such as magnesium
- Factory has adequate number of extinguishers.
- All fire extinguishers have instructions in local language on front.
- Fire extinguishers are placed in accessible locations, mounted on wall or column, with clear, prominent markings.
- The handle height to be placed 3-1/2 to 5 feet above the floor. Larger fire extinguishers need to be mounted at lower heights with the carrying handle about 3 feet from the floor.
- Extinguishers should be in appropriate weight to ensure all workers can handle them. Extinguishers are inspected each month and shall be documented. Qualified personnel service extinguishers once per year. If fire hydrants are present, factory flushes them at least twice per year. If fire hydrants are present, hoses, standpipes and all water sources, including fire pumps, should be inspected during fire drills.
- Factory has a maximum travel distance to extinguishers for workers of 23 meters or 75 feet for Class A, C and D fires and 15 meters or 50 feet for Class B fires.

3. Fire Training/Fire Hydrants:

- Factory personnel (workers and supervisors) are trained at regular intervals in fire safety, emergency evacuation and the use of fire extinguishers every 12 months.
- Certificates and pictures of fire safety and emergency evacuation training are maintained (with proper dates).
- Factory holds fire emergency drills annually with a fire authority sign off. Documented the names of the drill participants and the time it took to evacuate.
- Factory trains new workers in fire drill procedures.
- Fire hydrants systems are inspected quarterly by internal staff and annually by independent fire inspection company. Records must be maintained for Audit.
- Facility must ensure that adequate water supply is available for fire hydrant system so that enough water is readily accessible in the event of fire emergency. If a water tank or cistern is on property, it should be verified that it is of correct capacity (volume) as required by law and that it is full.

4. Fire Alarm:

- Factory has a fire alarm system that is audible throughout the entire facility with secondary power supply.
- Fire alarm has a distinct sound from other notice systems and be 90 dB or higher in noise areas and have a beacon/flashing light.
- Alarm is tested regularly in coordination with fire drills. Alarm tested annually by third party.
- Factory trains all new workers about alarm system sound and procedures.

5. Emergency Exits

- Factory has at least 3 emergency exits per floor in buildings with less than 1,000 workers. See below.

10-499 persons	500-1000 persons	>1000
2 or more exits	3 or more exits	4 or more

- Emergency exits with independent pathways must be remotely located at a reasonable distance from each other and not on the same wall. Windows are not considered as an emergency exit.
- Factory ensures that the maximum travel distance to an emergency exit is 200 feet or 61 meters for Non-Sprinklered industrial buildings. 300 feet or 91 meters in a Non-Sprinklered area office.
- Exit doors are on opposite ends of the building.
- Exit doors are well designated and have a width adequate for the number of workers it must accommodate.
- Exit doors are not locked and do not have locks that require special operation. Emergency exit doors must open readily from the occupied side and swing in the direction of egress travel and must require push bar or single motion operation (i.e. lever knob), minimal effort or force (interior 5 lbf (22N or less), for exterior doors no more than 50lbf (222 N)) and not be equipped with hardware that requires special keys or knowledge to open.
- Emergency exit signs are visible from 30m and use letters at least 18cm high. Also, signs have bright colors are illuminated under power with battery backup or have a photo-luminescent front panel.
- Battery-operated exit signs are checked monthly and batteries are replaced every two years.
- Doors swing in the direction of exit travel and lead directly to the outside.
- Doors that are not exits are labeled such (e.g. Not-An-Exit).
- Areas 69m² (750 square feet) AND occupancy up to 9 persons, are allowed to have 1 emergency exit.
- Exit doors shall be a single action required to open.

6. Emergency Exit Routes:

- Exit routes are not obstructed by equipment, materials, product, etc. and are regularly checked.
- Two exit routes exist on opposite sides of the factory.

- Factory marks on the floor with photo-luminescent paint and emergency exit lights.
- All exit routes are at least 1.2 meters or 3.3 feet and shall be lighted.
- Emergency exit routes shall have visible symbols on floor or walls pointing in direction of travel.
- All assembly gathering locations shall be designated and clear at all times.
- Stairwell exits and fire escapes have an automatic closure system that can be released manually from the inside to prevent smoke from filling stairwells. Magnetically activated fire doors are permitted to remain open as long as they automatically close when the fire alarm system is activated.
- Multi-story facilities are required to have sufficient vertical escape routes. These must be one-hour fire rated enclosure staircase (e.g. fully enclosed without openings, made of material such as concrete or two layers of fire rated sheetrock, and with one-hour rated self-closing fire doors) if they service more than one floor, or external fire escape routes.
- Emergency exit signs are in local language.

7. Emergency Lighting:

- Factory has emergency lighting for all stairways and where needed on exit routes. Emergency lights to be fire grade 'industrial emergency lights' for use in smoke and fire environments.
- Lighting shall have a secondary source and will last for a reasonable period of time.
- Factory regularly checks test-button and replace batteries immediately if needed on emergency lighting systems. Monthly testing with records indicating testing.

8. Electrical Wiring:

- Electrical cords in the factory and dormitories are in good condition and properly encased to prevent shorting or fire.
- Electrical equipment is grounded to prevent injury and/or fire where there is risk.
- Electrical cords are not found in damp areas or in standing water.
- Electrical wiring does not obstruct aisles unless they are securely taped to the floor in a manner that does not create additional hazard.

9. Personal Protective Equipment (PPE):

- Where there is risk, all workers are provided with the appropriate PPE, trained on the use of the PPE, and why using it is important. PPE assessments are needed to determine type.
- Factory provides impact-resistant goggles or other eyewear to workers in areas where there is persistent glare, flying debris or dust, splashing of primers or cleaners.
- Factory provides gloves to workers that are handling/applying chemicals such as solvents, adhesives, and finishes. Gloves are resistant to these chemicals.
- Metal gloves are provided when working with sharp objects or cutting instruments.
- Proper respirators are worn in areas where vapors are present and are not sufficiently reduced by other methods such as ventilation.
- Appropriate footwear is provided for workers working on wet surfaces. Reinforced shoes or boots for workers operating or moving heavy equipment.

- Dust masks are provided to minimize exposure to particulate matter such as dust or textile particles.
- Factory has signs, with the appropriate international symbol, showing what personal protective equipment should be worn when in this area.
- All workers are adequately and suitably informed by the factory of potential occupational hazards in the working environment due to air pollution, noise and vibration, and are instructed in the measures available for the prevention and control of, and protection against those hazards.

10. Noise Levels:

- In high noise level areas, ear protection (ear plugs) is provided, potential hazards are communicated, and worker usage is enforced in an appropriate manner. {90 decibels are higher in an 8-hour period}
- Factory uses a sound meter to take periodic measurements of noise levels in the factory and keeps a record of sound levels in various work areas. Using a 3rd party for testing is suggested.

11. Lighting:

- Factory has minimum illumination of 30 foot-candles (300 Lux) in work areas.
- Factory has a minimum illumination of 5 foot-candles (50 Lux) in corridors utilized as emergency routes.
- Factory uses a light meter to take periodic measurements of light levels in the factory and keeps a record of light levels in various work areas

12. Ventilation:

- Factory has adequate ventilation system in work areas where chemicals are handled and where there is significant dust or material particles.
- Factory ensures that the daily average temperatures inside the factory do not exceed a differential of 10 degrees F (5.6 degrees C), with ambient temperatures outside the workplace building.
- Factory has ventilation system present in enclosed spaces

13. Hazardous Chemicals or Materials:

- Factory stores chemicals in a separate area which is equipped with appropriate fire extinguishers, safety signs, ventilation, instructions on handling and disposal, and personal protective equipment for personnel.
- Factory is familiar with all chemicals on site and the potential health effects (see list of commonly found hazardous chemicals in manufacturing facilities at the end of this document).
- All workers handling hazardous chemicals or materials have undergone training on appropriate handling, emergency procedures and personal protective equipment.
- Explore opportunities for hazardous chemical/material minimization and document changes made

14. Machine Guards:

- Factory ensures that where there is risk (bar tack, button, overlock, grinding, snap machine, die cut, etc.) machines have the necessary safety devices and guards.
- Workers are trained on how to operate machinery in a safe and effective manner.
- A written maintenance plan exists which outlines machine inspections.
- Factory keeps records of machine, equipment and wiring inspections and repairs.
- Factory maintains records of permits for equipment such as elevators and any other types of equipment requiring special permits.

15. Medical Care:

- Factory has a system in place to address severe injuries (such as an agreement with the local hospital, transportation arrangements, etc.).
- Factory has a medical clinic available on-site or near, to address basic health and injury needs.
- A schedule for medical personnel (doctors or nurses) is established to ensure that trained medical personnel are available during all working hours.
- Factory maintains copies of licenses for all applicable medical personnel.
- Post the medical clinic service days/hours, the nearest hospital's names and full address, and the police and fire station phone number on the notice board.
- Included in the personnel policy is a description of what medical care is available and how to access it by workers.
- A record of injuries is maintained at the factory to focus on how injuries can be reduced.

16. First Aid (General):

- Factory has one properly stocked first aid kit available for every 100 workers.
- At a minimum, factory maintains standard first aid kits that include basic supplies such as bandages, scissors, gloves, gauze, eyewash solution, antiseptic ointment, and an emergency log.
- In cases where first aid supplies are locked for security reasons, supplies must be accessible to the first aid trained staff within 3 minutes.
- First aid stations are posted with a first aid sign and the names and photos of trained first aid personnel are posted.
- The first aid kit is inspected regularly and restocked when needed. Any expired items are disposed of and replaced.
- Factory trains an adequate number of personnel (production workers and supervisors) in first aid procedures.
- Records are maintained for workers seeking first aid to track injury/illness as well as remedy.

First Aid Box Maintenance

- Outside label lists staff members with certified first aid training (all shifts) and an emergency contact phone number.
- Inside label shows minimum contents and quantities.
- Contents periodically reviewed for relevance by designated staff.

- Box inspected regularly, written inspection record on file.
- Number of boxes: 1 per 100 workers, or a minimum of 1 box per production area.
- It is recommended that the first aid kit be unlocked during working hours.
- If locked, key must be within easy reach, and/or at least three workers with key are near the box.

First Aid Training

- Depending on the risk and size of the factory, each production area/shift has an adequate number of workers trained to treat common workplace industries.
- Factory keeps written, clearly defined procedures for common workplace injuries.

17. Toilets:

- Factory has at least 1 toilet for the first 25 workers of a particular gender, with an additional toilet for each additional 40 workers of the same gender.
- Ventilation system exists to provide good circulation of air to reduce odors.
- Facilities provide adequate privacy (i.e. ability to lock doors, etc.).
- Factory has a cleaning and maintenance schedule with adequate janitorial staff to ensure that the facilities are clean and working at all times.
- Factory does not unreasonably restrict access to toilet facilities.
- Factory provides wash basins with cleansing agents or hand soap and hand towels or dryers.

18. Drinking Water:

- Factory has purified/potable drinking water for each worker that is available at all times.
- Access to drinking water is not unreasonably restricted.
- Drinking water containers are kept clean and have adequate protections to restrict any type of contamination from getting into the water.
- Workers are provided separate drinking cups to prevent illness and contamination.
- Drinking water is tested periodically (i.e. every 6 months) to ensure that water is safe. Further, the test report is posted at the drinking water station.

19. Canteens:

- Canteen staff ensures that any spoiled or questionable food is not utilized and properly disposed.
- Utensils, dishes and cookware are properly sanitized after use.
- If legally required, factory has the necessary inspections from government health officials and maintains records of these inspections.
- Factory prepares meals that are high quality and nutritious.
- Factory holds training for kitchen personnel in areas of hygienic food preparation and nutrition.
- If legally required, the canteen staff needs to log daily the food samples that were held back in refrigerator for 24 hours.
- If legally required, the canteen staff has a health check at least annually and obtains a health certificate.

20. Boiler Operation/Air Compressor:

- If applicable, steam boiler must have operation certificate and maintenance record endorsed by local labor authority or certified safety inspector.
- If legally required, the operator of the boiler should be trained on its use with proper occupation certificate.
- The steam boiler should be placed in a separate, well-ventilated room. The safety check certificate should be posted on wall in room.
- Air Compressor and any air tank vessels shall meet local regulations.

21. Wastewater Treatment:

- The wastewater from washing, dying operation or other hazardous liquid waste streams must be separated and treated before disposal.
- The wastewater system must have an official inspection certificate from recognized government authority, and post the copy of the certificate near the facility.

22. Dormitories:

- All health and safety guidelines listed above are implemented in factory sponsored dormitory buildings.
- Factory provides a safe living environment for workers, and complies with all legal regulations regarding residential facilities, where provided.
- Dormitories are not located above any production or warehouse buildings.
- Each dormitory floor has at least 2 accessible, unlocked, and clearly marked exits leading to the outside.
- The minimum amount of square footage allocated per resident is 20 square feet per worker.
- Residents should have their own bed, an area for personal items and the ability to secure belongings.
- Toilets and showers provide adequate privacy.
- Water usage for showering and bathing should not be restricted and/or limited to unreasonable hours of operation.
- Dormitory has adequate lighting and ventilation to produce a comfortable living area.
- Male and Female workers are on separate floors.

Working Hours

Supplemental Guidelines

It is common for factories to encourage or require workers to work hours in excess of legal limits or to discourage or deny workers their right to a day of rest, vacation or sick leave.

To prevent this, the Wahl Clipper Workplace Standards requirement on working hours prohibits: (1) work in excess of the legal limits; (2) not providing at least one day off out of seven; and (3) the practice of not providing workers with all vacation, sick and other leave required by law. Where the law permits working hours beyond 60 in a week, the Global Compliance Program also requests that factories work no more than 60 hours per week.

With respect to working hours during peak production seasons, Wahl Clipper Corporation permits factories to work more than 60 hours in a week (regular and overtime) so long as the factory complies with the following 5 supplemental requirements:

1. It does not exceed 12 hours per day, 6 days per week for a total workweek of 72 hours;
2. One day off in seven is provided or workers are provided another day of rest during the next week. If work must be carried out on the rest day during peak season, it cannot occur more than once in a two-week time period.
3. Peak season is limited to no more than 4 months or 17 weeks distributed throughout a one-year period. The maximum 60-hour workweek for non-peak production should be employed for at least 8 months out of 12;
4. Workers are compensated for regular and overtime hours in accordance with local law
5. Workers are educated on the standard workweek and the factory seeks their willingness to work overtime hours. For workers not interested in working overtime, the factory must be supportive of their decision and will not, in any way, force or coerce them to work overtime hours.

Record Keeping

Supplemental Guidelines

The items bolded below are minimum requirements. In addition, all factories must comply with the specific legal requirements governing notices and record keeping. All other items listed below are suggestions or good practices adopted by “model” factories.

1. Personnel Files:

- Each factory must maintain personnel files for each worker.
- Personnel files must include a copy of the best age verification documentation available in the country of manufacture (e.g. government, passport, travel document, social insurance card, etc.).
- Proof of the date of hire with the signature of the worker.
- Employment contracts must include category of employment, fixed period of employment (if applicable), employment terms including wages and benefits, and hours of work. The original employment contract must be in the language of the worker and signed by the employer and employee. The original must be given to the employee, and a copy should be available in the personnel file.
- Recent photo of the worker.
- Application for employment with basic information on the worker such as address, contact information, recommendations, experience and education.
- Written disciplinary actions taken against the worker, where applicable, including the signature from the worker acknowledging receipt of the disciplinary action.

2. Time Cards:

- All factories use a time card, electronic bar card system, or attendance sheets to measure actual working hours for all production workers.
- If a time card or electronic bar card system is used, time measured must include in and out times at the start and end of each day.
- Attendance sheets may be used so long as they include time in and out each day, overtime hours, rest day hours, and the signatures of workers acknowledgement (on at least a weekly basis) confirming the accuracy and completeness of the attendance sheets.
- Time card records should be maintained for at least 1 year. Some countries require factories to maintain time card records for longer than 1 year.

3. Payroll Records:

- Each factory must maintain a payroll register that proves proper payment of wages to each worker per hour, per day, per month or per piece.
- Payroll register should include regular working hours, overtime working hours, gross wages derived from pieces produced or working hours, applicable production bonuses, allowances, applicable deductions, and net wages.
- Original piece rate and other supporting documentation for the payroll register must also be maintained as proof.
- Payroll records must be maintained for at least 1 year. Some countries require factories to maintain payroll records for longer than 1 year.
- Detailed line items for things like holiday hours, top-up bonuses, overtime payment for piece rate work, loans, tardiness deductions, etc. are also encouraged.
- Signature on the payroll register from workers acknowledging the line items and receipt of net wages is also encouraged.

4. Pay Slips:

- Each factory must provide a pay slip to workers in the local language for each pay period that details items such as regular working hours/days, overtime hours, piece rate wages (if applicable), gross wages, deductions, and net wages.
- Workers' signature on the factory's copy of the pay slip is also encouraged to prove that workers have acknowledged the line items and have received the net wages.