



Assessment Report

Ky Caravat Manufacturing Co., Ltd

Service Provider:	LRQA
Report No.	LRQA-VN-OLYM-324734
Assessment Type:	Impact Full Audit
Schedule Type:	Announced
Assessors:	Ly Nguyen
Assessment Date:	September 10, 2025 ~ September 12, 2025

Report Summary

Ky Caravat Manufacturing Co., Ltd

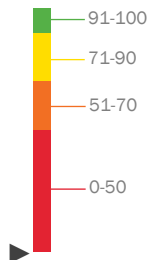
 Country/Region Viet Nam	Sector Apparel, Footwear and Textile	No. of Employees 113	Average units produced per week: 6125
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Audit Summary

Audit score

0

Red (D)



Total Findings

55

Zero Tolerance	0
Critical	1
Major	11
Moderate	30
Minor	13

Key Workforce Statistics



Domestic Migrant Workers
74



Juvenile Workers
0



Foreign Migrant Workers
0



Use of Labor Agents
Yes



Language Spoken by Workers
Vietnamese (Tiếng Việt)

Performance Details

Categories	Zero Tolerance	Critical	Major	Moderate	Minor	Total Findings
1. Transparency & Business Integrity	0	0	0	0	0	0
2. Management System	0	0	0	3	0	3
3. Labor	0	0	3	6	1	10
4. Health & Safety	0	1	7	21	12	41
5. Environment	0	0	1	0	0	1
Overall	0	1	11	30	13	55

General Assessment Overview

The announced Impact Full Audit assessment started at 8:30 am on September 10, 2025, and concluded at 04:30 pm on September 12, 2025. One LRQA field staff (female) was assigned to verify the factory's overall compliance with the LRQA Responsible Sourcing Standards and applicable local laws. Additionally, one LRQA shadower observed the first day of the assessment. The audit approach included onsite confidential interviews with workers, document/record review, physical observations, and management interviews. Conclusions were drawn based on a limited but thorough sampling, with collaboration from various information sources. Facility management, including Ms. Thao Le - Trade Union Chairman, Mr. Tri Nguyen - Production Supervisor, Trang Chau - HR Supervisor, and Ms. Huyen Nguyen - Merchandise Supervisor, participated in the opening meeting and were cooperative throughout the audit process. The requested documents and records were provided promptly. All major findings were communicated to the facility management, Trang Chau - HR Supervisor and Ms. Huyen Nguyen - Merchandise Supervisor, during the closing meeting. They agreed with the findings and committed to making the necessary improvements.

Good Practices & Priority Improvement Areas

Good Practices

Section	Details
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No good practice identified during this assessment.

Priority Improvement Areas (Zero Tolerance / Critical / Major Findings)

Rating	Details
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Major

Wages & Benefits

It was noted that 100% of the re-employed workers from Ha Gia Phat labor broker were paid at a 1.12 rate for normal overtime and a 1.73 rate for Sunday overtime, instead of the 1.5 and 2.0 rates as required by law. These workers received 300,000 VND for their daily wage but only 42,000 VND/hour for normal overtime instead of VND 56,250 and VND 65,000/hour for Sunday overtime instead of VND 75,000.

Major

Wages & Benefits

It was noted during the document review that all 65 re-employed workers from the Ha Gia Phat labor broker agent were not provided with legally mandated benefits, including:

- + Annual leave (for all workers).
- + Social insurance (for all workers).
- + Childcare allowance (for workers with a child under 6 years old).
- + Menstrual allowance (for female workers).

Major

Hours of Work

It was noted during document reviews that 8 out of 25 randomly selected workers worked from 8 to 30 consecutive days without rest of at least twenty-four consecutive hours after 6 working days in August 2025, April 2025 and November 2024. These samples were direct and re-employed workers from various production sections, including cutting, sewing, packing, and finishing.

Major

Building Safety

It was noted during the document review and confirmed by the facility management that the facility's construction permits and final construction acceptance of 2 out of 2 buildings were not available for review. These buildings had 1 floor with a total area of 1,260 m², used for production sections, a warehouse, and office purposes, with all 113 employees working inside.

Major

Emergency Preparedness

It was noted during the document review and confirmed by the facility management that the facility's fire safety design; fire safety approval certificate for the fire-fighting system of 2 out of 2 buildings were not available for review. These buildings had 1 floor with a total area of 1,260 m², used for production sections, a warehouse, and office purposes, with all 113 employees working inside.

Major

Emergency Preparedness

It was noted during document review and as per the facility management confirmed that the automatic fire alarm system had not been annually inspected and maintained by a qualified contractor as per legal requirements.

Major

Emergency Preparedness

It was noted during the site tour that 1 out of 2 observed exit doors in the box-making room was partially obstructed by chairs, tables, materials and cart.

Critical

Emergency Preparedness

It was noted during the site tour that 1 out of 2 main emergency exits leading out of the building was locked with a padlock during working hours.

Major

Emergency Preparedness

It was noted that during the site tour that 100% observed escape routes at cutting section, sewing section, ironing section, warehouse were temporarily obstructed by machines, materials, chairs and tables.

Major

Emergency Preparedness

It was noted during the site tour that 1 out of 5 observed escape route in the sewing section was only 55cm instead of at least 100 cm.

Major

Employee Protection & Machine Safety

It was noted during the site tour that the stop buttons on 100% of the observed machines, including cutting, die-cutting, pressing, etc., were not labeled in the local language (Vietnamese). These machines were located in all production sections.

Major

Environment

It was noted during document review that the facility had not obtain an Environmental license / Environmental registration as per legal requirements until the assessment day.

Audit Findings

1. Transparency & Business Integrity

No. of Findings

0	0	0	0	0
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2. Management System

No. of Findings

0	0	0	3	0
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Management System

ERSA-2.01

Moderate

Details

It was noted during the management interview and documentation review that the facility did not have a social and environmental policy and code endorsed by senior management.

Legal requirements

In accordance with ERSA requirement; ERSA-2.01. The facility establishes a written social and environmental compliance policy and code which are endorsed by senior management and cover the key elements of the standard.

Recommendations

It is recommended that the facility should establish a written social and environmental policy and code, which is endorsed by senior management and cover the key elements of the standard.

ERSA-2.05

Moderate

Details

It was noted during document review that the facility did not have a system to identify and monitor laws, regulations and customer requirements that apply to the facility. The records of monitoring and updating new laws/regulations/requirements were not available to review.

Legal requirements

In accordance with ERSA requirement; ERSA-2.05. The facility implements a system to identify and monitor laws, regulations and customer requirements that apply to the facility. Most current version of applicable laws, regulations and customer requirements shall be obtained.

Recommendations

It is recommended that the facility should have a system to identify and monitor laws, regulations and customer requirements that apply to the facility. Most current version of applicable laws, regulations and customer requirements shall be obtained.

ERSA-2.08

Moderate

Details

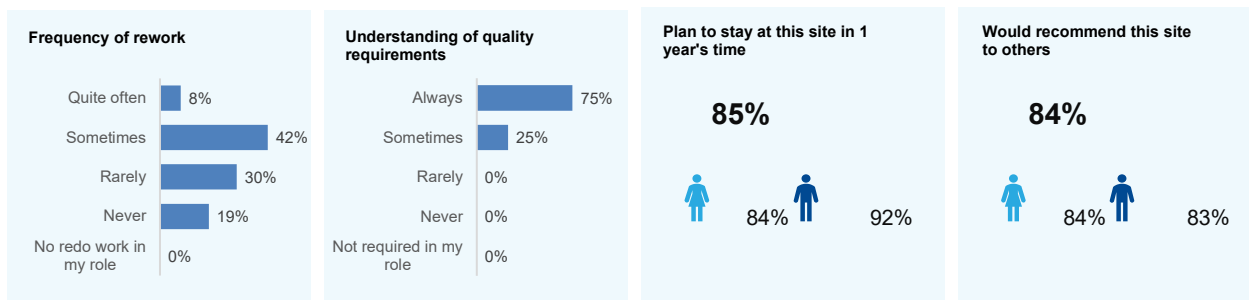
It was noted that the facility does not conduct regular management review (at least annually) of the social compliance system. The written records from management review meeting should be available for review.

Legal requirements

In accordance with ERSA requirement; ERSA-2.08. The facility should conduct regular management review (at least annually) of the social compliance system. The written records from management review meeting should be available for review.

Recommendations

It is recommended that the facility conduct regular management review (at least annually) of the social compliance system. The written records from management review meeting should be available for review.

Worker sentiment data

3. Labor

No. of Findings

0	0	3	6	1
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Hiring, Disciplinary & Termination

ERSA-3.02

Moderate

Details

It was noted during the document reviews that:

+ 8 out of 25 randomly selected workers' contracts did not reflect the actual salary and wage methodology. For example, worker A was paid VND 300,000 for an 8-hour working day, VND 42,000 per overtime hour, VND 520,000 VND for a Sunday 8-hour working day, but the on their labor contract their salary was 5,131,000 VND per month, 37,000 VND per overtime hour, and 49,000 VND per overtime hour on Sunday. These workers were re-employees workers from Ha Gia Phat agency and currently working in Packing, Finishing, and Cutting sections.

+ 25 out of 25 randomly selected workers' contracts and annex contracts did not mention either their working hours or rest periods. These samples were direct and re-employed workers from various sections, including sewing, cutting, ironing, packing, QC, etc.

Legal requirements

In accordance with Labor Code No. 45/2019/QH14, Article 21. Contents of employment contracts.

1. An employment contract shall have the following major contents:

- The employer's name, address; full name and position of the person who concludes the contract on the employer's side.
- Full name, date of birth, gender, residence, identity card number or passport number of the person who concludes the contract on the employee's side.
- The job and workplace.
- Duration of the employment contract.
- Job- or position-based salary, form of salary payment, due date for payment of salary, allowances and other additional payments.
- Regimes for promotion and pay rise.
- Working hours, rest periods.
- Personal protective equipment for the employee.
- Social insurance, health insurance and unemployment insurance.
- Basic training and advanced training, occupational skill development.

Recommendations

It is recommended that the facility should ensure employment contract include all required contents and are up-to-date as legal requirements.

ERSA-3.05

Moderate

Details

It was noted during the document review that the factory had signed contracts with two labor broker agents, Thien Ha and Ha Gia Phat, to re-employ 91 workers (26 from Thien Ha and 65 from Ha Gia Phat). These workers were worked in various production sections, including cutting, sewing, ironing, finishing, packing, inspecting, etc. However, according to legal requirements, jobs related to the apparel manufacturing industry cannot be re-employed through labor broker agents.

Legal requirements

In accordance with Decree 145/2020/ND-CP. Article 30. List of works permitted for labor dispatch.
The list of works permitted for labor dispatch is provided in Appendix II hereof.

Recommendations

It is recommended that the facility should not use re-employed workers.

ERSA-3.10

Moderate

Details

It was noted during the document review that the facility's managers and supervisors were not trained with the disciplinary policy and appropriate disciplinary measures. The related disciplinary training records were not available to review.

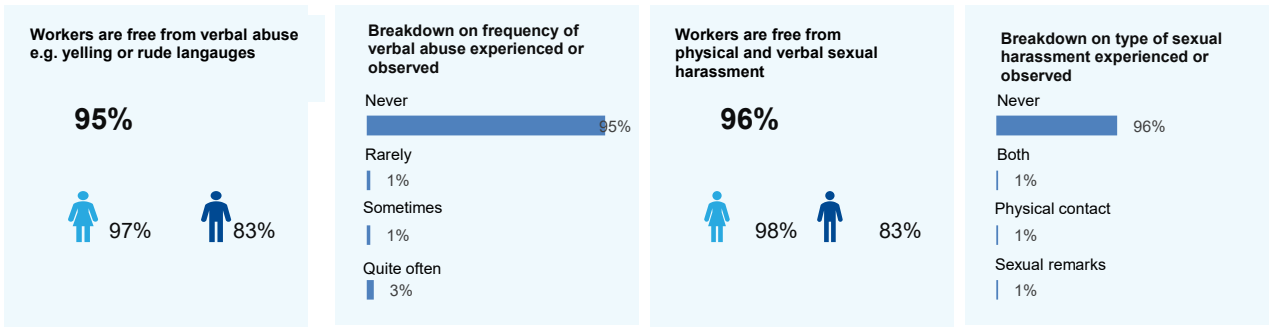
Legal requirements

In accordance with ERSA requirement; ERSA-3.10. The facility ensures managers and supervisors are fully trained with the disciplinary policy and appropriate disciplinary measures; training records are maintained.

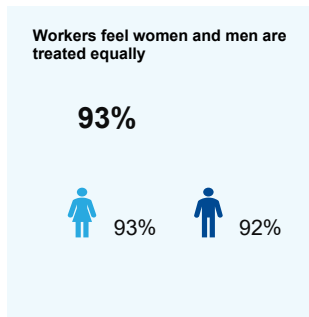
Recommendations

It is recommended that factory should ensure managers and supervisors are fully trained with the disciplinary policy and appropriate disciplinary measures; training records are maintained.

Worker sentiment data



Worker sentiment data



Freedom of Association & Grievance

ERSA 8.12

Moderate

Details

It was noted that the facility was using suggestion boxes as a grievance mechanism. However, the facility could not provide evidence to prove that these suggestion boxes were opened to check and worker grievances were followed up.

Legal requirements

In accordance with ERSAs requirement; ERSAs 8.12

The facility communicates grievance information back to workers whether or not a resolution was reached. Evidence of management following up on worker grievances shall be maintained.

Recommendations

It is recommended that the facility should ensure to maintain evidence of management following up on worker grievances.

ERSA 8.13

Minor

Details

It was noted during the document review that the facility had not promulgated internal workplace democracy regulations until the assessment day.

Legal requirements

In accordance with Decree No. 145/2020/ND-CP, Article 48. Responsibility to promulgate internal workplace democracy regulations

1. The employer shall promulgate internal workplace democracy regulations in order to implement regulations on dialogue in the workplace and implementation of workplace democracy in accordance with this Decree.
2. After the internal workplace democracy regulations are formulated or revised, the employer shall consult with the internal employee representative organization (if any) and the representative group (if any) before promulgating them. In case there are opinions offered by internal employee representative organization with which the employer do not concur, explanation must be provided.
3. The internal workplace democracy regulations must be made publicly available to the employees.

Recommendations

It is recommended that facility should promulgate internal workplace democracy regulations in order to implement regulations on dialogue in the workplace and implementation of workplace democracy.

Worker sentiment data



Wages & Benefits

ERSA-9.03

Major

Details

It was noted that 100% of the re-employed workers from Ha Gia Phat labor broker were paid at a 1.12 rate for normal overtime and a 1.73 rate for Sunday overtime, instead of the 1.5 and 2.0 rates as required by law. These workers received 300,000 VND for their daily wage but only 42,000 VND/hour for normal overtime instead of VND 56,250 and VND 65,000/hour for Sunday overtime instead of VND 75,000.

Legal requirements

In accordance with Labor Code No. 45/2019/QH14 Article 98. Overtime pay, night work pay

1. An employee who works overtime will be paid an amount based on the piece rate or actual salary as follows:

- a) On normal days: at least 150%;
- b) On weekly days off: at least 200%;

Recommendations

It is recommended that the factory should ensure to pay sufficient overtime for employees as per legal requirements.

ERSA-9.08

Major

Details

It was noted during the document review that all 65 re-employed workers from the Ha Gia Phat labor broker agent were not provided with legally mandated benefits, including:

- + Annual leave (for all workers).
- + Social insurance (for all workers).
- + Childcare allowance (for workers with a child under 6 years old).
- + Menstrual allowance (for female workers).

Legal requirements

- + In accordance with Labor Code No. 45/2019/QH14, Article 113. Annual leave.
- + In accordance with Social Insurance Law 58/2014/QH13 dated on November 20, 2014, Article 2. Subjects of application. Point 1. Employees being Vietnamese citizens shall be covered by compulsory social insurance
- + In accordance with Labor Code No. 5/2019/QH14, Article 136. Responsibilities of the employer. Point 4. Assist in building day care facilities and kindergartens, or cover a part of the childcare expenses incurred by employees.
- + In accordance with the Labor Code 2019, Article 137. Maternity protection.

Recommendations

It is recommended that the facility should ensure all employees were provided with legally mandated benefits.

ERSA-9.15

Moderate

Details

It was noted during the document review that the facility paid the salary for resigned workers along with the monthly salary payment cycle (on the 5th of the following month) instead of within 14 days after the resignation date. In addition, the facility did not have any regulations regarding the calculation of severance pay and the payment timeline, to ensure that severance pay was paid correctly and on time.

Legal requirements

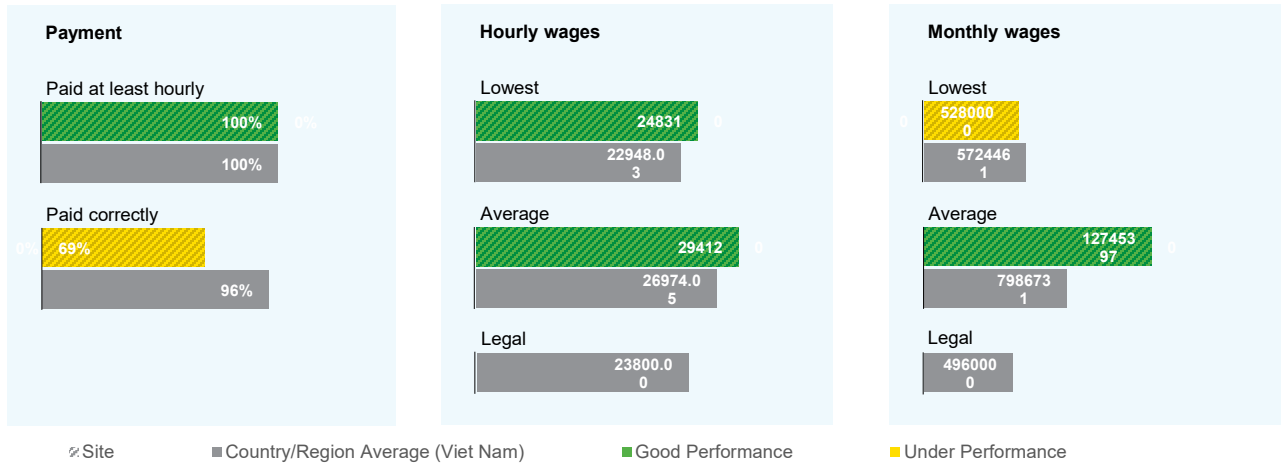
In accordance with Labor Code No. 45/2019/QH14, Article 48, Point 1. Within 14 working days following the termination of an employment contract, both parties shall settle all payments in respect of the rights and interests of each party. In the following cases, such period may be extended, but shall not exceed 30 days:

- a) Shutdown of business operation of the employer that is not a natural person.
- b) Changes in the organizational structure, technology or changes due to economic reasons.
- c) Full division, partial division, consolidation, merger of the enterprise; sale, lease, conversion of the enterprise; transfer of the right to ownership or right to enjoyment of assets of the enterprise or cooperative.
- d) Natural disasters, fire, hostility or major epidemics.

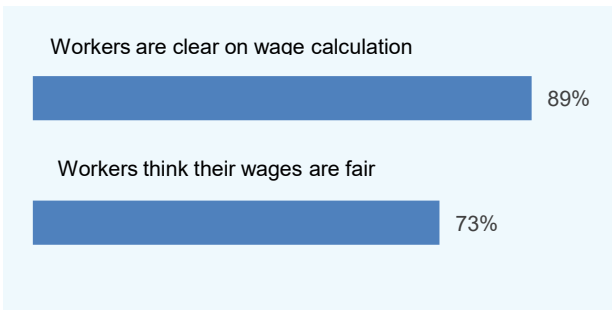
Recommendations

It is recommended that the factory should ensure to pay the salary for resigned workers within 14 days as law requirements.

Audit data



Worker sentiment data



Hours of Work

ERSA-10.07b

Moderate

Details

1/ It was noted during document review that monthly overtime hours of 8 out of 25 randomly selected workers were from 42.0 to 85.0 hours in March 2023 instead of maximum 40 hours per month as per legal requirement. These samples were direct and re-employed workers from various production sections, including cutting, sewing, packing, and finishing.

2/ It was noted during document review that weekly working hours (including overtime hours) of 6 out of 25 randomly selected workers were from 61.5 to 71.5 hours in August 2025 and November 2024 instead of maximum 60 hours. These samples were direct and re-employed workers from various production sections, including cutting, sewing, packing, and finishing. □

Legal requirements

1/ In accordance with Labor Code No. 45/2019/QH14, Article 107. Point 2b. The number of overtime working hours of the employee does not exceed 50% of the normal working hours in 01 day; in case of weekly work, the total normal working hours plus overtime working hours shall not exceed 12 hours in 01 day, and 40 hours in 01 month.

2/ In accordance with ERSA requirement; ERSA-10.07b. The overtime hours for all employees are within allowable limits under applicable laws or agreements whichever is stricter. (Non-Compliant: Above 60 and not more than 72 h/week). □

Recommendations

1/ It is recommended that the facility should ensure overtime working hours for employees are within allowable limits as per the legal requirement.

2/ It is recommended that the facility should ensure working hours (including overtime hours) do not exceed 60 hours per week. □

ERSA-10.08c

Major

Details

It was noted during document reviews that 8 out of 25 randomly selected workers worked from 8 to 30 consecutive days without rest of at least twenty-four consecutive hours after 6 working days in August 2025, April 2025 and November 2024. These samples were direct and re-employed workers from various production sections, including cutting, sewing, packing, and finishing.

Legal requirements

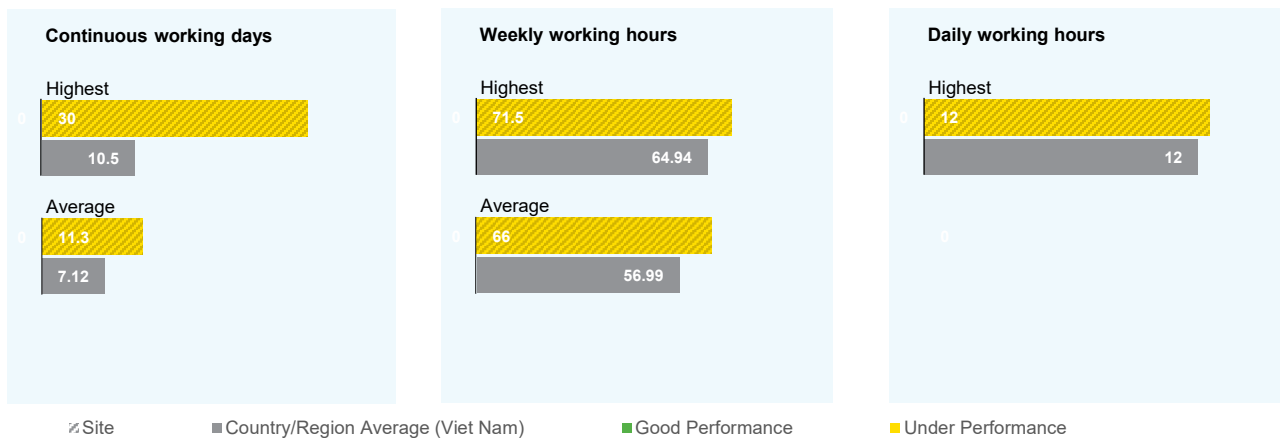
In accordance with Labor Code No. 45/2019/QH14, Article 111.

1. Each week an employee is entitled to a break of at least 24 consecutive hours. Where it is impossible for the employee to have a weekly day off due to the work cycle, the employer has the responsibility to ensure that on average the employee has at least 04 days off per month.
2. The employer has the right to determine and schedule the weekly breaks either on Sunday or for another fixed day in a week, which must be recorded in the internal labor regulations.

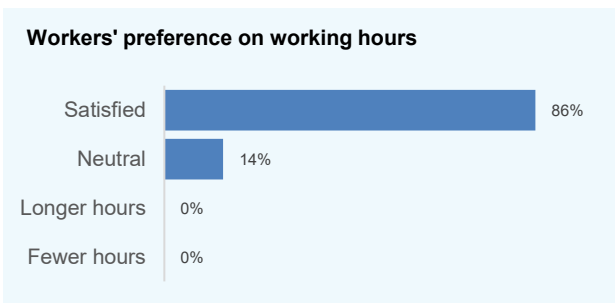
Recommendations

It is recommended that the facility should ensure all employees are entitled to a rest of at least twenty-four consecutive hours in 07 days.

Audit data



Worker sentiment data



4. Health & Safety

No. of Findings



General Work Environment

ERSA-11.1.01

Moderate

Details

It was noted that the facility did not have totally 101 employees but did not assign at least one person to carry out the activities of occupational safety and sanitation in the form of full-time as per legal requirements.

Legal requirements

In accordance with 39/2016/ND-CP, Article 36. Organization of occupational safety and sanitation division

The organization of occupational safety and sanitation division specified in Paragraph 1, Article 72 of the Law on occupational safety and sanitation is provided for as follows:

1. For the business and production establishments operating the fields and business lines of mining, coke production, making of refined petroleum products, chemical production, production of metal and metal products, production of non-metallic mineral products, construction works performance, ship building and repairment, power production and transmission, the employer must organize the occupational safety and sanitation division to ensure the minimum requirements as follows:

- a) The business and production establishments which employ fewer than 50 persons must have at least 01 person to carry out the activities of occupational safety and sanitation in the form of part-time;
- b) The business and production establishments which employ between 50 and fewer than 300 persons must have at least 01 person to carry out the activities of occupational safety and sanitation in the form of full-time.

Recommendations

It is recommended that the facility should assign qualified persons to carry out the activities of occupational safety and sanitation as per legal requirements.

ERSA-11.1.02

Moderate

Details

It was noted during the facility tour that the facility was not clean and tidy in the warehouse, program sewing room, and around the facility compound.

Legal requirements

In accordance with Labor Code No. 45/2019/QH14; Article 134. Ensuring occupational safety and health at the workplace

1. Employers shall fully implement the measures for ensuring occupational safety and health at the workplace.

Recommendations

It is recommended that the facility ensure the working areas are clean and tidy.

ERSA-11.1.10

Minor

Details

It was noted during the facility tour that the facility did not provide hand soap and toilet paper for all male and female toilets in the production areas. The facility did provide hoses in toilets for workers to use to clean themselves.

Legal requirements

In accordance with ERSA requirement; ERSA-11.1.10. Toilets shall be stocked with toilet paper, clean running water, and soap.

Recommendations

It is recommended that the facility provide toilets that are stocked with toilet paper, clean running water, and soap.

ERSA-11.1.12

Minor

Details

It was noted during document review and as per the facility management confirmed that the facility had not conducted annual workplace environmental monitoring until the assessment day.

Legal requirements

In accordance with Decree 44/2016/ND-CP; Article 45. Responsibility of the business and production establishments

1. Review and group the subjects in need of training, list of machine, equipment and materials with strict requirements on occupational safety and sanitation and the list of workplace with risks of loss of occupational safety and sanitation; make plan and carry out the technical inspection of occupational safety, training of occupational safety and sanitation and working environment observation according to regulations of law; update the occupational sanitation dossier on the contents related to harmful factors in need of working environment observation upon change of technological procedures, production procedures upon renovation or upgrading of labor establishment with risk of generating new harmful factors for the employees' health.

Recommendations

It is recommended that the facility conduct workplace environmental monitoring annually as per legal requirements.

Building Safety

ERSA-11.2.02

Major

Details

It was noted during the document review and confirmed by the facility management that the facility's construction permits and final construction acceptance of 2 out of 2 buildings were not available for review. These buildings had 1 floor with a total area of 1,260 m², used for production sections, a warehouse, and office purposes, with all 113 employees working inside.

Legal requirements

In accordance with No. 62/2020/QH14 Law on Amendments to Construction Law Article 30, Article 89 is amended as follows: "Article 89. General provisions on grant of construction permits 1. Construction works required to have construction permits granted by competent state agencies to project owners in accordance with regulations laid down herein, except the cases prescribed in Clause 2 of this Article.

Recommendations

It is recommended that the factory should ensure all legally required construction permits and final-acceptance test minutes of construction are available for review.

ERSA-11.2.05

Moderate

Details

It was noted during document review that the facility did not conduct construction safety assessment for 2 out of 2 building, which was constructed in 1999. These buildings had 1 floor with a total area of 1,260 m², used for production sections, a warehouse, and office purposes, with all 113 employees working inside.

Legal requirements

In accordance with Circular 10/2021/TT-BXD, Article 17. Construction safety assessment

Point 2. Assessment of construction safety shall follow the procedures issued by the Ministry of Construction.

3. The time and frequency of construction safety assessment shall be regulated as follows

- a) The first construction safety assessment shall be carried out 10 years from the time the construction project is put into operation or use according to the provisions of law;
- b) The next assessment of safety of a construction project shall be carried out every 5 years.

Recommendations

It is recommended that the facility should construction safety assessment as per legal requirements.

Emergency Preparedness

ERSA-11.3.01

Major

Details

It was noted during the document review and confirmed by the facility management that the facility's fire safety design; fire safety approval certificate for the fire-fighting system of 2 out of 2 buildings were not available for review. These buildings had 1 floor with a total area of 1,260 m², used for production sections, a warehouse, and office purposes, with all 113 employees working inside.

Legal requirements

In accordance with Law No. 55/2024/QH15.

+ Article 16. Fire prevention and firefighting requirements in development and revision of construction projects, design, renovation, repurposing of structures, manufacturing, assembly, construction, modification of vehicles

1. Upon development and revision of construction projects, design, renovation, repurposing of structures under Clause 7 Article 2 hereof and construction of temporary structures in accordance with construction laws, fire prevention and firefighting solutions and design shall be developed in a manner appropriate to occupancies and characteristics of the structures and provisions below.

+ Article 2. Definitions

7. Establishment under fire and rescue management (hereinafter referred to as “establishment”) means buildings, structures, locations serving residential, manufacturing mercantile, commercial, office purposes among other purposes, built and operated in a law-compliant manner, and named under list prescribed by the Government. An agency or organization may consist of multiple establishments. An establishment may consist of multiple agencies and/or organizations.

Recommendations

It is recommended that the factory should ensure all legally required fire safety design/fire safety approval certificate of the fire-fighting system; construction permits and final-acceptance test minutes of construction are available for review.

ERSA-11.3.10

Moderate

Details

It was noted during the site tour that 02 observed fire extinguishers at the box storage were placed directly on ground instead of being mounted.

Legal requirements

In accordance with ERSA requirement; ERSA-11.3.10. Fire extinguishers are properly mounted or securely placed throughout the facility.

Recommendations

It is recommended that the facility should ensure all fire extinguishers are mounted.

ERSA-11.3.11

Moderate

Details

It was noted during the site tour that:

+ 100% observed fire extinguishers at all section in the facility were not provided with operating instructions and location signage.

+ 04 observed fire extinguishers in the box-making section and inspecting section were temporarily obstructed by carton boxes and tools.

Legal requirements

+ In accordance with TCVN 7435-1:2004 National Standard Fire protection – Portable and wheeled fire extinguishers - Part 1: Selection and Installation. Point 4.2.2. Periodic inspection is conducted to ensure that fire extinguishers: a/ Being placed at a defined location b/ Being unobstructed and easy to see and the instruction for use of the fire extinguisher turns out. c/ Clear instructions for use. d/ Seal or insert part is not broken or lost. e/ Being full (by weight to lift) f/ No damage, corrosion, leakage or nozzle is clogged g/ The needle of the pressure gauge must be in the operative position or operative range.

+ In accordance with TCVN 7435-2: 2004, Part 4, point 4.2 Check.

4.2.1 Extinguishers shall be inspected upon first being put into service and shall then be inspected every 30 days thereafter. Extinguishers shall be tested at shorter intervals when required.

4.2.2 Periodic checks are made to ensure that the extinguisher:

a/ Be placed in the correct position.

b/ Unobstructed and conspicuous and the instructions for use of the flask facing outwards.

c/ Clear instructions for use.

d/ Seals or inserts are not broken or lost.

e/ Full (by weighing or lifting)

f/ Not damaged, corroded, leaked or the nozzle is sealed.

g/ If the gauge is a pressure gauge, the hand of the gauge must be in the operating position or within the operating range.

Recommendations

It is recommended that the factory should ensure all fire equipment is clearly marked and easily accessible.

ERSA-11.3.12

Moderate

Details

It was noted during the site tour that:

- 1/ 100% observed fire extinguishers at all areas in the building were not provided with monthly check. The relevant inspection logs were not available to review.
- 2/ The facility was using a fire pump shared with the industrial complex, located about 20 meters away. However, this pump was not checked daily, and relevant logs were not available for review.

Legal requirements

- 1/ In accordance with TCVN 7435-2: 2004, Part 4, point 4.2 Check.
 - 4.2.1 Extinguishers shall be inspected upon first being put into service and shall then be inspected every 30 days thereafter. Extinguishers shall be tested at shorter intervals when required.
 - 4.2.2 Periodic checks are made to ensure that the extinguisher:
 - a/ Be placed in the correct position.
 - b/ Unobstructed and conspicuous and the instructions for use of the flask facing outwards.
 - c/ Clear instructions for use.
 - d/ Seals or inserts are not broken or lost.
 - e/ Full (by weighing or lifting)
 - f/ Not damaged, corroded, leaked or the nozzle is sealed.
 - g/ If the gauge is a pressure gauge, the hand of the gauge must be in the operating position or within the operating range.

2/ In accordance with Circular No. 36/2025/TT-BCA.

+ Article 6. Maintenance of fire and rescue instruments.

1. The maintenance of fire and rescue instruments shall comply with Clause 3 of this Article and be decided by the heads of establishments in terms of the time and location for the maintenance in accordance with each instrument type and guidelines of the manufacturers (if any), ensuring such instruments' fire and rescue readiness.

Motorized fire and rescue vehicles and self-contained breathing apparatus shall be maintained every day or during and after each use.

+ Appendix II, Maintenance of motorized fire and rescue vehicles; Article 1; Clause 1. 1. Regular maintenance.

b) For fire pumps, start the engine once for at least 3 minutes (when not pumping or drawing water) or 15 minutes (when pumping or drawing water). If the ambient temperature is below 10°C, start the engine twice per day, 8 hours apart. □

Recommendations

1/ It is recommended that all fire extinguishers be inspected monthly, and that relevant records be maintained for review.

2/ It is recommended that the facility should ensure all fire water pumps are checked daily and relevant logs are maintained. □

ERSA-11.3.13

Major

Details

It was noted during document review and as per the facility management confirmed that the automatic fire alarm system had not been annually inspected and maintained by a qualified contractor as per legal requirements.

Legal requirements

In accordance with Circular 36/2025/TT-BCA.

Article 6. Maintenance of fire and rescue instruments

3. The maintenance of fire and rescue instruments shall comply with Appendixes II, III, IV, and V enclosed with this Circular and the manufacturers' guidelines (if any).

Recommendations

It is recommended that factory should ensure the automatic fire alarm system is annually inspected and maintained.

ERSA-11.3.15

Moderate

Details

It was noted during the site tour that 03 out of 04 exit doors in the box storage, box-making room and programing sewing room were not provided with exit signs.

Legal requirements

In accordance with TCVN 13456:2022 Fire protection - Emergency lighting and Exit sign - Design, installation requirements, Article 5.2 Instructions for escape

5.2.1 Signs indicating the exits and escapes

Install signs indicating the exits and exits at all exits of the escape stairs, the escape routes on the floor and all exits of the room with 02 or more exits;

Recommendations

It is recommended that the facility should ensure all emergency exits are clearly marked with illuminated exit signs.

ERSA-11.3.17

Moderate

Details

It was noted during the site tour that 04 out of 04 exit doors in the box storage, box-making room and programing sewing room were not provided with emergency lightings.

Legal requirements

In accordance with TCVN 13456:2022 Fire protection - Emergency lighting and Exit sign - Design, installation requirements, Article 5.1 Incident lighting. Point 5.1.1 Emergency lighting must be installed for areas of buildings and structures at the following locations:

- a) Escape stairs.
- b) The escape route and the location of the escape route, the intersection of the corridor.
- c) There is a change in altitude on the escape route.
- d) Exit doors and exits.
- e) Garage for parking.
- f) In the room with people working and the distance from the farthest point of the room to the nearest emergency exit is more than 13 m. In case these rooms have an escape route, they can only install emergency lights at that escape route.
- g) In the room where the transformer station is located, the generator room, the elevator technical room, the refuge space.
- h) In the firefighting control room, fire pump room and at locations equipped with other fire prevention and fighting means.

Recommendations

It is recommended that the facility should ensure emergency lights are provided at required locations.

ERSA-11.3.18

Major

Details

It was noted during the site tour that 1 out of 2 observed exit doors in the box-making room was partially obstructed by chairs, tables, materials and cart.

Legal requirements

In accordance with Decree 105/2025/NĐ-CP, Article 13. Details and entitlement to fire prevention and firefighting inspection.

- o) Maintenance of means of egress, emergency exits, or walkways satisfactory for emergency exit;

Recommendations

It is recommended that the facility should ensure all exit doors are accessible and free from obstruction during working hours (including overtime).

ERSA-11.3.19

Critical

Details

It was noted during the site tour that 1 out of 2 main emergency exits leading out of the building was locked with a padlock during working hours.

Legal requirements

In accordance with Decree 105/2025/NĐ-CP, Article 13. Details and entitlement to fire prevention and firefighting inspection.

- o) Maintenance of means of egress, emergency exits, or walkways satisfactory for emergency exit.

Recommendations

It is recommended that the facility should ensure all exit doors are accessible and free from obstruction during working hours (including overtime).

ERSA-11.3.22

Minor

Details

It was noted during the site tour that no evacuation maps were posted in any sections of the building. Only one evacuation map was posted outside of the building.

Legal requirements

In accordance with ERSA requirement; ERSA-11.3.22. Fire and emergency evacuation plans are prominently posted on every floor and work area as well as near exits and stairways. Evacuation plans accurately reflect facility layout, include "you are here" mark, and are in a language understood by most employees.

Recommendations

It is recommended that the facility should ensure evacuation plans are posted along emergency exit pathway and near entrances to stairs.

ERSA-11.3.23

Major

Details

It was noted that during the site tour that 100% observed escape routes at cutting section, sewing section, ironing section, warehouse were temporarily obstructed by machines, materials, chairs and tables.

Legal requirements

In accordance with Decree 105/2025/NĐ-CP, Article 13. Details and entitlement to fire prevention and firefighting inspection.
o) Maintenance of means of egress, emergency exits, or walkways satisfactory for emergency exit.

Recommendations

It is recommended that the facility should ensure all aisles and passageways are always kept clear.

ERSA-11.3.24

Major

Details

It was noted during the site tour that 1 out of 5 observed escape route in the sewing section was only 55cm instead of at least 100 cm.

Legal requirements

In accordance with Circular 06/2022/TT-BXD National Technical Regulation on Fire safety of Buildings and Constructions, Point 3.3.6. Clearance height of horizontal sections of escape routes must not be less than 2 m, clearance width of horizontal sections of emergency exit and slope sections must not be smaller than:
a) 1.2 m - for shared corridors used to escape for more than 15 people from rooms of group F1, more than 50 people - from rooms of the group of fire danger according to other functions.
b) 0,7 m - for walkways to individual workplaces.
c) 1,0 m - in all other cases.

Recommendations

It is recommended that the factory should ensure the widths of passages leading to individual working spaces are not less than 0.7 m and 1.0 m – for all remaining cases.

ERSA-11.3.28

Minor

Details

It was noted during document review that the evacuation drill records on December 20, 2024 were not included with dated photos and attendee list.

Legal requirements

In accordance with ERSA requirement; ERSA-11.3.28. Evacuation drills are documented with a complete written log with dated photos and attendee list.

Recommendations

It is recommended that the facility should ensure evacuation drills are documented with a complete written log with dated photos and attendee list.

ERSA-11.3.29

Moderate

Details

It was noted during the site tour that the facility's emergency assembly point was occupied by vehicles instead of keeping free to ensure enough safety accommodate for all employees in an emergency.

Legal requirements

In accordance with ERSA requirement; ERSA-11.3.29. There are designated emergency assembly points large enough to safety accommodate all employees.

Recommendations

It is recommended that the facility should ensure the designated emergency assembly points were large enough to safety accommodate all employees.

ERSA-11.3.30

Minor

Details

1/ It was noted during the document review that the facility had only one team captain instead of at least 25 members, which should include a team captain and 3 second-in-command.

2/ It was noted during the document review that the factory did not provide annual fire safety training to all members of the fire-fighting team. The last training was conducted on August 30 & 31, 2022. □

Legal requirements

1/ In accordance with Decree No. 105/2025/NĐ-CP.

Article 20. Establishment, organization, operation, and operating condition assurance of grassroots fire and rescue forces and specialized fire and rescue forces.

5. Arrangement of grassroots fire and rescue forces:

a) Grassroots fire and rescue teams of establishments frequented by 20 to 50 people shall consist of at least 10 members which include a team captain and a second-in-command;

b) Grassroots fire and rescue teams of establishments frequented by exceeding 50 to 100 people shall consist of at least 15 members which include a team captain and 2 second-in-command;

c) Grassroots fire and rescue teams of establishments frequented by exceeding 100 people shall consist of at least 25 members which include a team captain and 3 second-in-command;

d) Fire and rescue groups affiliated to grassroots fire and rescue teams shall consist of at least 5 members which include a leader

dd) Where establishments consist of multiple agencies and organizations, the agencies and organizations shall assign their personnel to participate in fire and rescue teams form by heads of establishments.

2/ In accordance with Decree No. 105/2025/NĐ-CP, Article 29. Clause 2. Duration of training and refresher training for fire and rescue provided for Chairpersons, Vice Chairpersons of commune-level People's Committees, members of grassroots fire and rescue teams shall be:

a) A minimum of 16 hours and a maximum of 24 hours of fire and rescue training;

b) A minimum of 4 hours and a maximum of 8 hours of refresher fire and rescue training.

Article 29. Duration of training and refresher training for fire and rescue operations

4. Fire and rescue training shall be conducted once every 5 years; refresher fire and rescue training shall be conducted every year. □

Recommendations

1/ It is recommended that the factory should provide sufficient fire-fighting team members as per legal requirements.

2/ It is recommended that the facility should provide annual training on fire safety to all members of the fire-fighting team. □

ERSA-11.3.33

Minor

Details

It was noted during the site tour that 100% escape routes in the box-making room, box storage, programming-sewing room were not provided with instructions (yellow lines and directional arrows).

Legal requirements

In accordance with Vietnam Standard No. 2622.1995 for Fire Prevention, Part 7.5. the exits must be easily found, and the exit paths must be clearly marked with the instructions.

Recommendations

It is recommended that exit routes are clearly marked with yellow lines and directional arrows.

Chemical & Hazardous Substances

ERSA-11.4.02

Moderate

Details

It was noted during the site tour that the facility was using some chemicals (such as glue, paint, acetone, machine oil, etc.). However, the facility did not maintain records of the distribution, handling, and use of chemicals.

Legal requirements

In accordance with QCVN 05A:2020/BCT, Article 2.5. Chemical incident response procedures and lists of chemicals and MSDSs, which should be placed in noticeable and accessible positions. A list of chemicals must contain information about chemicals' names and trade names, classification, pictograms, maximum quantities stored at a time and storage areas.

Recommendations

It is recommended that the facility ensure chemical inventory lists, including all required information, are maintained and are available for review.

ERSA-11.4.04

Moderate

Details

It was noted during the site tour that the facility was using some chemicals (such as glue, paint, acetone, machine oil, etc.). However, no Material Safety Data Sheets (MSDS) were posted or available for review.

Legal requirements

In accordance with ERSA requirement; ERSA-11.4.04. Material safety data sheets (MSDS) are prominently posted in both storage and use zones, and maintained in languages understood by workers.

Recommendations

It is recommended that the facility should ensure MSDSs are prominently posted in both storage and use zones and maintained in languages understood by workers.

ERSA-11.4.05

Moderate

Details

It was noted during the site tour that 100% observed chemicals (such as glue, paint, acetone, machine oil, etc.) stored in the box-making room, programing sewing room and cutting section were not properly labeled according to the local safety standards and MSDS label instructions.

Legal requirements

In accordance with Article 4.4.3 and 4.4.4 of TCVN 5507:2002, containers and packages of hazardous chemicals must bear labels showing adequate information as prescribed in the Regulation on goods labeling. Safety symbols are specified in Appendix E; Chemical labels must be clear, legible, and not torn. If the label is lost and the chemical is not identified, an analysis shall be carried out to identify the name and primary contents of the chemical. A new label shall be put on before the chemical is sold or used.

Recommendations

It is recommended that the facility should ensure all chemicals were labeled properly as per legal requirements.

ERSA-11.4.07

Moderate

Details

It was noted during the site tour that 100% observed chemicals (such as glue, paint, acetone, machine oil, etc.) stored in the box-making room, programing sewing room and cutting section were not put in secondary containment to prevent chemical leakage.

Legal requirements

In accordance with ERSA requirement; ERSA-11.4.07. Preventative measures are in place to prevent chemical leakages such as secondary containers etc.

Recommendations

It is recommended that the facility should put chemicals in secondary containment to prevent chemical leakage.

ERSA-11.4.10

Moderate

Details

It was noted during the site tour that the facility was using some chemicals (such as glue, paint, acetone, machine oil, etc.). However, employees who were involved in handling, clean-up and disposal of these chemicals were not provided external labor occupational & hygiene training to workers (group 3) according to Decree 44/2016/ND-CP and Decree 113/2017/ND-CP. The list of employees who were involved in handling, clean-up and disposal of these chemicals were not available to review.

Legal requirements

In accordance with Decree 44/2016/ND-CP, Article 17. Subjects participating in the training course of occupational safety and sanitation. The subjects specified in Article 14 of the Law on occupational safety and sanitation are defined as the following groups: 3. Group 3: Employees performing work with strict requirements on occupational safety and sanitation are the persons who perform work included in the List of work with strict requirements on occupational safety and sanitation issued by the Ministry of Labor - Invalids and Social Affairs.

In accordance with Law on Occupational Safety and Hygiene No. 84/2015/QH13 dated on June 25, 2015, Article 14. Training in occupational safety and hygiene.

In accordance with Decree 113/2017/ND-CP; Article 32. Individuals provided with training courses in chemical safety

1. Group 1:

a) Heads of factories/stores, divisions and branches; heads of production/trade/technical departments; managers of factories or equivalents;

b) Vice heads of factories/stores mentioned in Point a Clause 1 this Article responsible for chemical safety.

2. Group 2:

a) Full-time or part-time officials responsible for chemical safety of factories/stores;

b) Supervisors directly overseeing chemical safety.

3. Group 3: Employees directly involving in chemicals.

Recommendations

It is recommended that the facility should ensure all employees who work with chemicals are provided external labor occupational & hygiene training to workers (group 3) as per legal requirements.

Employee Protection & Machine Safety

ERSA-11.5.02

Moderate

Details

It was noted during the site tour and as confirmed by the facility management that the facility did not provide masks for all sewing workers. Masks were provided by workers. About 30% observed sewing workers did not wear masks while working.

Legal requirements

In accordance with 84/2015/QH13, Law on occupational safety and hygiene, Article 23, Point 1. Every employee who does dangerous or harmful works shall be adequately provided with personal protective equipment by the employer and he/she is required to use it during the course of work.

Recommendations

It is recommended that facility should provide and monitor workers to use PPEs during working.

ERSA-11.5.09

Major

Details

It was noted during the site tour that the stop buttons on 100% of the observed machines, including cutting, die-cutting, pressing, etc., were not labeled in the local language (Vietnamese). These machines were located in all production sections.

Legal requirements

In accordance with Law on Occupational Safety and Hygiene No. 84/2015/QH13 dated on June 25, 2015, Article 16. Responsibility of the employer for assurance of occupational safety and hygiene at the workplace

There are warning and instruction signs made in Vietnamese and popular language of employees in relation to occupational safety and hygiene for machinery, equipment, materials and substances that having strict safety and hygiene requirements at the workplace, preservation places, usage places that are placed at obvious locations.

Recommendations

It is recommended that the facility should ensure all emergency stop switches are made in a language understood by most employees.

ERSA-11.5.10

Minor

Details

It was noted during the site tour and as confirmed by the facility that the facility did not have a Lock-out/tag-out program.

Legal requirements

In accordance with ERSA requirement; ERSA-11.5.10. Machines and equipment have a lockout/tagout program, while applicable.

Recommendations

It is recommended that the facility should have a Lock-out/tag-out program.

ERSA-11.5.11

Minor

Details

It was noted that the factory only 11 out of 101 employees were provided with occupational safety and health trainings instead for all employees.

Legal requirements

In accordance with No. 84/2015/QH13 Law on Occupational Safety and Hygiene, Article 14. Training in occupational safety and hygiene.

Point 1. Managers in charge of occupational safety and hygiene, persons in charge of occupational safety and hygiene, health officers, occupational safety and hygiene officers in the business entities are required to participate in training in occupational safety and hygiene and they are issued certificates by institutions providing training in occupational safety and hygiene upon their examination pass.

Point 2. The employer shall provide training for employees who do work having strict safety and hygiene requirements and grant them safety cards before giving work assignment.

Recommendations

It is recommended that facility shall ensure to provide occupational safety and health training for assigned employees/ workers before working and periodic.

Electrical Safety

ERSA-11.6.04

Moderate

Details

It was noted that 02 observed electrical panels near the packing section were obstructed by carton boxes.

Legal requirements

In accordance with Article 5, Point 4, Decree 14/2014/ND-CP. At the operating positions, there must be all procedures: Equipment operation, troubleshooting of electrical incidents; power grid outline, rules of fire prevention and fighting, operation logbook, devices, equipment and means of personal protection, restricted signs, signals and other devices and means under regulation.

Recommendations

It is recommended that the factory should ensure that all electrical control panels are free of obstructions.

ERSA-11.6.05

Minor

Details

It was noted during the site tour 2 out of 5 observed electrical panels at box-making section and cutting section were not provided with warning signs.

Legal requirements

In accordance with Article 5, Point 4, Decree 14/2014/ND-CP. At the operating positions, there must be all procedures: Equipment operation, troubleshooting of electrical incidents; power grid outline, rules of fire prevention and fighting, operation logbook, devices, equipment and means of personal protection, restricted signs, signals and other devices and means under regulation.

Recommendations

It is recommended that the facility should ensure all electrical panel are clearly marked with warning signs.

ERSA-11.6.10

Minor

Details

It was noted during document reviews that the facility had not conducted ground resistance testing for the electrical equipment system.

Legal requirements

In accordance with No. 61/2024/QH15, Electric Law, Article 73. Safety in use of electricity for production.

b) Electrical equipment and instrument systems, lightning protection and earthing systems must be accepted, undergo periodical and surprise inspection and technical safety inspection and be repaired and maintained according to standards and technical regulations on electrical engineering and safety, and other relevant regulations of law. The diagrams of these systems must reflect their actual status and archived together with repair and maintenance documents and inspection records throughout their operation.

Recommendations

It is recommended that the facility should conduct grounding resistance for electrical equipment periodically.

ERSA-11.6.11

Minor

Details

It was noted during the site tour 100% observed electrical panels at all sections in the facility were not provided with rubber mats underneath to prevent electrical shocks.

Legal requirements

In accordance with TCVN 7447-4-41:2010 Low-voltage electrical installations - Part 4-41: Protection for safety - Protection against electric shock. Annex B

B.2. Obstacles NOTE Obstacles are designed to prevent unintentional contact with live parts but do not prevent intentional contact by deliberately going around the obstacle. B.2.1. Obstacles must prevent: - unintentional contact of the body with live parts, or - unintentional contact with live parts during operation of live equipment in normal operation.

Recommendations

It is recommended that the facility should ensure all electrical panels are provided with rubber mats underneath to prevent electrical shocks.

ERSA-11.6.12

Minor

Details

It was noted that 01 observed electrical panels in the box-making room was not installed with inner covers.

Legal requirements

In accordance with TCVN 7994-1: 2009: Low-voltage switchgear and controlgear assemblies - Part 1: Type-tested and partially-tested assemblies 7.4.2.2 Protection by shield or enclosure. The following requirements shall be complied with. 7.1.2.2.2.3 Where precautions are taken when removing the shield, opening the enclosure, or pulling the parts of the enclosure (door, box, lid, cover and similar), shall comply with one of the following requirements: c) ASSEMBLIES shall have internal obstructions or shutters covering all live parts in such a way that unintentional touching of live parts is not possible when open door. This obstruction or shutter shall comply with the requirements of 7.4.2.2.1 (for exceptions, see item d) and 7.4.2.2.2. Obstacles or shutters must be fixed in the right position or slide back into the correct position when the door is opened. It is not possible to remove obstacles or shutters without using keys or tools. It may be necessary to provide warning labels.

d) In the case of any part behind the shield or inside the enclosure but which is sometimes required to be operated (e.g. replacing a lamp or fuse), it may be removed, opened or pulled without using a key, lock or tool and do not cut off the electricity when the following conditions are met (see 7.4.6): is there an obstacle behind the shield or inside the cabinet to prevent unintentional contact with live parts? protected by other protective measures. However, this obstacle does not necessarily prevent humans from intentional contact by bypassing this obstacle with their hands. Unable to remove obstacles without using a key or tool; live parts whose voltage satisfies the conditions of extremely safe low voltages is not shielded.

Recommendations

It is recommended that the facility should ensure all electrical panels are provided with proper covers.

First Aid / Medical

ERSA-11.7.01

Moderate

Details

It was noted during site tour that the facility had around 97 workers working but there were only 2 first-aid kits (class A) were installed at the box-making section instead of at least 4 first-aid kits (class A) as per legal requirements.

Legal requirements

In accordance with Circular No. 19/2016/TT-BYT on guidelines for occupational health and safety management, Annex 4, Article 2. Quantity of first aid kits in workplaces.

Recommendations

It is recommended that the facility should ensure first aid kits are installed sufficiently and well-stocked as the legal requirements.

ERSA-11.7.02

Moderate

Details

It was noted during the site tour that 01 out of 01 observed first aid kit at the box-making section was not fully equipped with 27 items as the legal required. The missing items were bandage scissors respirator, braces, gloves, antiseptic, neck splints, arm splints, forearm splints, thigh splints, shin splints, safety goggles, first aid treatment regimen, list of items in the first aid kit, etc.

Legal requirements

In accordance with Circular No. 19/2016/TT-BYT on guidelines for occupational health and safety management, Article 6. Requirements for first aid kits, 1. First aid kits shall be available in the workplace, at accessible and visible positions, with Red Cross symbol thereof. 2. Quantity of first aid kits and items thereof shall be conformable to Annex 4 hereof (27 supplies).

Recommendations

It is recommended that the facility should ensure first aid kits are installed sufficiently and well-stocked as the legal requirements.

ERSA-11.7.04

Moderate

Details

It was noted during the document review that the facility had not established a first-aid team until the day of the assessment.

Legal requirements

In accordance with Circular No. 19/2016/TT-BYT, Article 7. Emergency response teams

2. Business establishments involving majors that require a strict application of occupational health and safety, employers shall recruit and allocate personnel to join emergency response team as follows:

3. For other establishments, employers shall recruit and allocate personnel to join emergency response team as follows:

- a) Where there are under 200 employees, at least one of them shall be assigned to participate in emergency response team;
- b) One more employee shall be assigned to participate in emergency response team for every additional 150 employees.

Recommendations

It is recommended that the facility should ensure the number of first aiders is sufficient as per legal requirements.

ERSA-11.7.05

Moderate

Details

It was noted that the facility did not have any medical staff to carry out medical activities, nor had it established a process for external medical treatment of workers in the event of occupational injury or illness.

Legal requirements

In accordance with Decree No. 39/2016/ND-CP, Article 37.

1. For the business and production establishments operating the fields and business lines of processing and preservation of aquatic products and products from aquatic products, mining, production of textile, leather, shoes, coke production, chemical production, making of products from rubber and plastic, waste recycling, environmental sanitation, metal production, ship building and repairment, production of constructional materials, the employer must organize the medical division at the establishment to ensure the minimum requirements as follows:

- a) The business and production establishments which employ fewer than 300 persons must have at least 01 person to carry out the medical activities with intermediate educational level.
- b) The business and production establishments which employ between 300 and 500 persons must have at least 01 doctor/physician and 01 person to carry out the medical activities with intermediate educational level.
- c) The business and production establishments which employ between 500 and under 1000 persons must have at least 01 doctor and each shift must have 01 person to carry out the medical activities with intermediate educational level.
- d) The business and production establishments which employ 1000 persons or more must establish the medical facility in the form and structure in accordance with regulations of law on health examination and treatment.

Recommendations

It is recommended that the factory have medical staff to carry out medical activities or establish a process for external medical treatment of workers in the event of occupational injury or illness.

ERSA-11.7.09

Moderate

Details

It was noted during the document reviews that:

1/ The facility only provided general health checkups once a year, instead of every 6 months, for employees working in conditions with the risk of occupational diseases. The last checks were conducted on October 14, 2024. Besides, only 36 out of 103 employees were provided with general health checkups.

2/ The list of examinations on October 14, 2024 did not include cervical cancer screening and breast cancer screening for female employees.

3/ The facility had not conducted occupational disease checks for employees who worked in conditions with hazards of occupational diseases until the assessment day.

Legal requirements

1/ In accordance with Law No. 84/2015/QH13 on Occupational Safety and Hygiene (2015). Article 21. Health check-ups and treatment for occupational diseases applicable to employees.

1. Annually, an employer shall organize health check-ups at least once a year for employees; and health check-ups at least every 6 months for employees doing heavy and harmful jobs and disabled, underage and elderly employees.

2. Beside regulations prescribed in Clause 1 of this Article, the employer shall organize obstetric checks for female employees, and occupational disease checks for employees who work in conditions with hazards of occupational diseases.

3. Before an employee is assigned works or taken another work that is more heavy, harmful or dangerous, or after a victim recovers from occupational accident or occupational disease and returns to work, the employer shall have them went for health check-ups, unless they have undergone decreased work capacity examinations conducted by a Medical Examination Council.

4. The employer shall organize health check-ups or occupational disease check-ups for employees at health facilities meeting professional and technical conditions.

2/ In accordance with Circular No. 32/2023/TT-BYT; Article 36. Health check items.

3. For periodic health check-ups: Examine health check items in the periodic health check-up book Form No. 03, Appendix No. XXIV of this Circular.

4. For female employees, their periodic health check-up will include the obstetrics check items mentioned in the list specified in Appendix No. XXV of this Circular.

3/ In accordance with Law No. 84/2015/QH13 on Occupational Safety and Hygiene (2015). Article 21. Health check-ups and treatment for occupational diseases applicable to employees

1. Annually, an employer shall organize health check-ups at least once a year for employees; and health check-ups at least twice a year for employees doing heavy and harmful jobs and disabled, underage and elderly employees.

2. Beside regulations prescribed in Clause 1 of this Article, the employer shall organize obstetric checks for female employees, and occupational disease checks for employees who work in conditions with hazards of occupational diseases.□

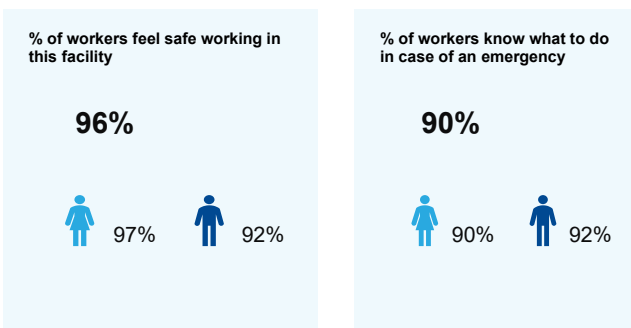
Recommendations

1/ It is recommended that the facility should provide sufficiently health examinations for all employees as per legal requirements.

2/ It is recommended that the facility should provide sufficiently health examinations for all employees as per legal requirements.

3/ It is recommended that the facility should provide occupational disease checks for employees who work in conditions with hazards of occupational diseases.□

Worker sentiment data



5. Environment

No. of Findings

0	0	1	0	0
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ERSA-12.02

Major

Details

It was noted during document review that the facility had not obtain an Environmental license / Environmental registration as per legal requirements until the assessment day.

Legal requirements

In accordance with Law No. 72/2020/QH14; Article 42. Bases and time for issuance of environmental license

2. The time for issuance of the environmental license is as follows:

d) The business, dedicated area for production, business operation and service provision or industrial cluster in Clause 2 Article 30 hereof that has been put into official operation before the effective date of this Law must obtain the environmental license within 36 months from the effective date of this Law, except for the case where the competent authority has issued the certificate of completion of environmental protection work, certificate of conformity with environmental standard, certificate of eligibility for environment protection in import of scrap from foreign countries as production materials, license for hazardous waste treatment, license to discharge wastewater into water sources, license to discharge wastewater into hydraulic structure (hereinafter collectively referred to as the “component environmental license”). The component environmental license may be used as the environmental license until its expiry or within 05 years from the effective date of this Law if it is an indefinite-term component environmental license.

Article 49. Environmental registration

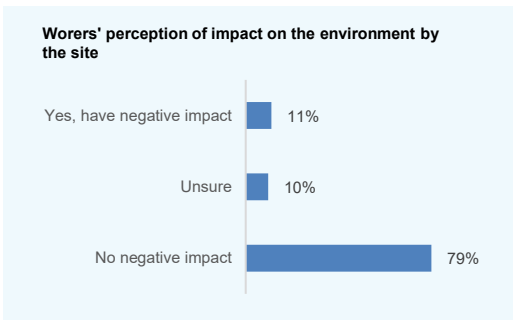
1. Obligated registrants:

- a) Waste-generating investment projects not required to obtain an environmental license;
- b) Waste-generating businesses operating before the effective date of this Law not required to obtain an environmental license.

Recommendations

It is recommended that the facility should have an Environmental license / Environmental registration as per legal requirements.

Worker sentiment data



Site Information

Site Profile

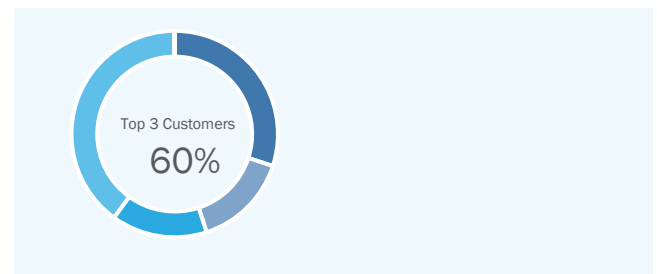
Site Name (English):	Ky Caravat Manufacturing Co., Ltd
Legal Site Name:	Công ty TNHH MTV Sản xuất Caravat Kỳ
Address (English):	Ky Caravat Manufacturing Co., Ltd
Site Legal Address:	17/6A Phan Huy Ích, phường An Hội Tây, Thành phố Hồ Chí Minh, Việt Nam
Business License #:	0301426391
Location Type:	Industrial Park
Year Site Began Operations:	1996
# of Buildings / Approx. Area (m2):	"With a total land of 1,260m2, the facility had 2 buildings. + Workshop #1 (01 floor) was used for office room and production sections, including cutting, sewing, ironing, inspecting and packing sections. + Workshop #2 (01 floor) was used for programming-sewing room, boxing-making room and carton box storage. Other supporting areas included parking lot area. The facility did not provide dormitories or childcare facilities for workers on-site."
Dormitories Onsite:	No
Multiple Tenants:	No
Site Owned:	No
Primary Contact:	Ms. Trang Chau
Title:	HR supervisor
Email:	ky@ky-konfektion.com; albee@kycravat.com; trang@kycravat.com
Phone:	08 39968246
Social Compliance Contact:	Ms. Trang Chau - HR supervisor
Average # of Assessments in a Year:	2
Last 3rd Party Assessment:	Aug 01, 25/SGS/OLYMP Bezner KG

Business Information

Brand(s) for Client:	OLYMP Bezner KG
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Customer Breakdown

Primary Customers	% of Business
OLYMP Bezner KG	30%
Charles Tyrwhitt	15%
JCREW	15%
Other	40%



Production Information

Main Production Processes:	Material - Cutting - Sewing - Ironing - Inspecting - Packing - Finished goods (Handkerchiefs and Ties)
Main Machine Types:	Sewing machines, cutting machines, box-making machines, gluing machines, pressing machines
Total Number of Machines:	37
Primary sector/product/commodity type:	Apparel Accessories

Detailed Information of Product Type:	Handkerchiefs and Ties
Average Units Produced per Week:	6125
Units Produced in Last 3 Months:	241585
Units Projection for Next 3 Months:	227334
Peak Season:	November, December
Low Season:	January

Employee Information

Total Number of Employees:	113
Production Workers:	103
Management Staffs (non-prod):	10
Male:	15
Female:	98
Local Workers:	29
Domestic Migrant Workers:	74
Foreign Migrant Workers:	0
Worker Turnover Rate (Annual):	5%

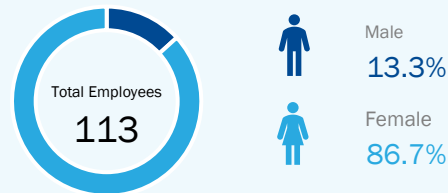
Language Spoken

Management:	English, Vietnamese (Tiếng Việt)
Workers:	Vietnamese (Tiếng Việt)

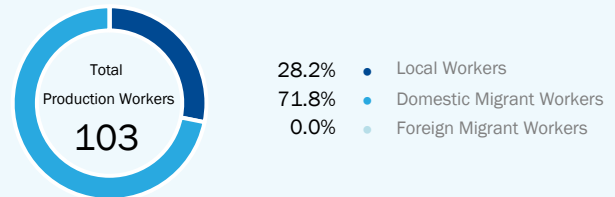
Worker Age Data

Personnel Files Reviewed:	25
Minimum Legal Work Age:	15
Youngest Worker Found:	18
Juvenile Workers:	0

Gender



Local / domestic migrant workers / foreign migrant workers



Breakdown of Domestic Migrant Worker

Province / Region	No. of Production Workers	% of Total Production Workers
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Breakdown of Workers by Nationality

Country/Region	Language Spoken	No. of Production Workers	% of Total Production Workers
Viet Nam	Vietnamese (Tiếng Việt)	103	100.00%

Labor Agents

Labor Agents Used: Yes

Breakdown of Labor Agents

Types of Agents	No. of Production Workers	% of Total Production Workers
Local Recruitment	95	92.23%

Wages and Working Hours

Wages Data

Wage System:	Hourly rate (for direct workers) and daily rate (for re-employed workers)
Payment Schedule:	By 5th every month
Wage Payment Method:	Bank transfer
Wage Payment Currency:	Vietnamese Đồng
Payroll Records Reviewed Period:	September 2024 - August 2025

Working Hours Data

Time Recording System:	Electronic
Time Records Complete or Not:	Yes
Overtime Waiver:	N/A
Shifts and Operating Hours:	The facility worked from Monday to Saturday with 01 shift, from 07:30 - 03:30 with 30 minutes for a lunch break, from 11:00 - 11:30.

Sampling Period

Record	Sample Month 1	Sample Month 2	Sample Month 3	Interview / Survey	# of workers
Payroll Records Sampling	Aug 2025	Apr 2025	Nov 2024	Total interviewed	25
Samples Reviewed	15	5	5	Individual interview	13
Time Records Sampling	Aug 2025	Apr 2025	Nov 2024	Group interview	12
Samples Reviewed	15	5	5		

Worker Sentiment Survey - Demographics of Respondents



Freedom of Association

Union in Site:	Yes
Name of Union:	Trade Union of Ky Caravat Manufacturing Co., Ltd
Name of Union Representative:	Ms. Thao Le - Trade Union Chairman
CBA in Place:	Yes
CBA Valid Period:	04.07.2023 to 04.07.2025 <input type="checkbox"/>
Worker Committee:	No

Subcontractor Information

Does the site employ subcontractors for any part of the production process?	No
Subcontractor Name (Service Provided)	N/A

Current Certifications / Programs

Certification / Program	Status	Expiry Date
BSCI	-	
ICTI	-	
EICC (RBA)	-	
WRAP	-	
SA8000	Active	January 8, 2025
SMETA	-	

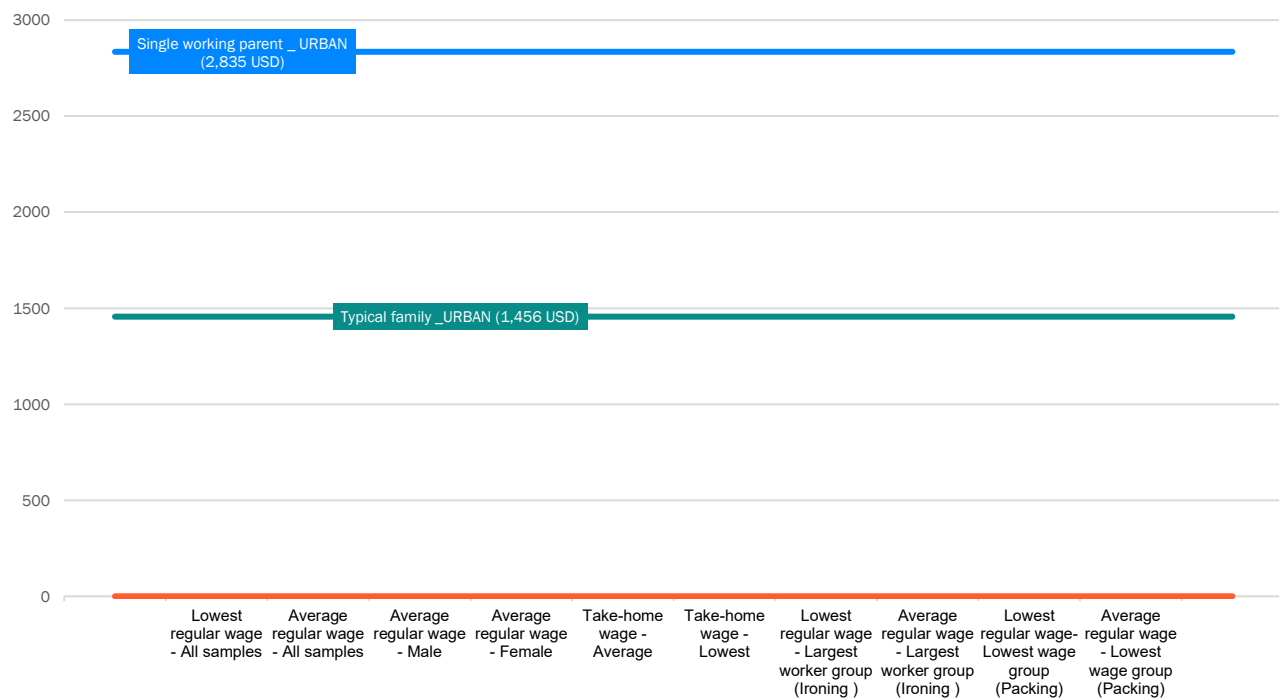
BAP	-
Better Work	-
ISO14001	-
OHSAS18001	-

LIVING WAGE

Key	Wage Benchmark	Key	Performance of facility
	Single working parent _ URBAN (2,835 USD)		Lowest regular wage - All samples
	Typical family _URBAN (1,456 USD)		Average regular wage - All samples
			Average regular wage - Male
			Average regular wage - Female
			Take-home wage - Average
			Take-home wage - Lowest
			Lowest regular wage - Largest worker group (Ironing)
			Average regular wage - Largest worker group (Ironing)
			Lowest regular wage- Lowest wage group (Packing)
			Average regular wage - Lowest wage group (Packing)

Exchange rate: 1 VND = 0.000041 USD, 1 VND = 0.000041 USD

LIVING WAGE LADDER



This wage ladder benchmarks is facility's monthly wage levels against the local legal minimum wage, as well as other relevant wage benchmarks for the country, region, or city the facility is located in. This wage ladder helps identify potential gaps between facility's actual wage levels and those wage benchmarks

The exchange rate information provided in this Report comes from <https://www.xe.com/currencytables/>, exchange rate date is March 12, 2024. that are not created and maintained by LRQA. It is important to note that data can vary in accuracy and reliability, and the interpretation of data can be subject to biases and limitations. While efforts have been made to provide accurate and up-to-date information, the possibility of errors or omissions cannot be completely ruled out. Additionally, data sources may have their own biases or limitations that could impact the objectivity or comprehensiveness of the information presented. Therefore, LRQA accepts no responsibility or liability of accuracy and reliability of the exchange rates. It is recommended to cross-reference information from multiple reliable sources and consult with experts or professionals in the relevant field to obtain a comprehensive and accurate understanding of the topic

A living wage is the monthly wage paid based on a standard working week that meets the basic needs of workers and their families and provides some discretionary income. 'Basic needs' includes costs like housing (with basic facilities like electricity), nutrition, clothing, healthcare, education, drinking water, childcare, transport, and savings.