



## **Facility Compliance Guidelines for VF Manufacturers**

The following guidelines are meant to assist the manufacturer in providing a fair, safe, and healthy work environment. As stipulated in the VF Terms of Agreement, the manufacturer must follow all relevant local laws, as well as the VF Global Compliance Principles. This guidance is meant as a clarification of those documents and in no way covers all aspects of compliance. If you have any questions regarding facility compliance, please contact VF's Compliance office.

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## **A. HUMAN RESOURCES:**

- ❑ VF Corporation's Global Compliance Principles should be prominently posted and accessible to all workers. It should be posted in the language(s) of the workers.
- ❑ Relevant national or regional labor laws should be posted in the local language. The posted laws should cover such areas as: Minimum wage, overtime rates, work hours, leave, and limits on overtime.
- ❑ Factory personnel policies should cover: wages, benefits, deductions, vacations, leaves, regular and overtime hours, overtime rates, discipline, termination, grievance procedures, harassment and abuse.
  - The factory should have a clear policy on worker discipline and established procedures for taking disciplinary action against a worker.
  - The factory should have clear policies on the unacceptability of harassment and abuse on the part of supervisory staff as well as procedures for workers to report such incidents.
  - The personnel policies should be written and distributed to all workers in the local language as well as being posted in public areas in the factory.
  - The factory should educate illiterate workers as to the personnel policies.
- ❑ Factory should maintain a thorough personnel file for each employee. A copy of proof of age document must be included in the personnel file of each employee. The factory should not hold originals of such documents. Grievance history, records of pay increases or decreases, and accident reports should all be included in an employee's personnel file.
- ❑ Payroll records are best kept on a computer payroll system linked to time cards and payslips.
- ❑ All hourly and production workers must use a time clock, swipe card, or other reliable mechanical device, to their start and stop times.
- ❑ Workers must regularly receive clear and complete payslips:
  - ❑ Payslip must be written in the local language.
  - ❑ Payslips must clearly indicate the number of regular and overtime hours worked, the rate at which those hours are compensated, bonuses, benefits, and deductions.
- ❑ All workers should be free to move about the factory (except for the protection of facility property or security) or to leave the factory at will.

## **B. HEALTH AND SAFETY**

The guidelines below are cited from the U.S. Department of Labor and other sources that have established norms derived from research into evacuation safety and the long-term effects of noise and luminosity on a worker's health.

### **1. Fire Safety:**

#### **Exits, aisles, and evacuation routes:**

- ❑ There should be a minimum of 2 exits per floor where up to 500 employees are stationed. Alternatively, there should be a minimum of 3 exits per floor where 500 or more employees are stationed. These exits should be located on opposite sides of the floor.
- ❑ Exits should be at least 28" wide if there are fewer than 60 workers in an area. Exits should be at least 44" wide if there are more than 60 workers in an area.
- ❑ Each work station should be located within 200 feet/60m of an exit
- ❑ Emergency exits should be unlocked while the building is occupied, unblocked by materials and debris, and easily accessible.
- ❑ Exits should be marked by signs visible 100 feet away that are illuminated with light sources backed up by battery. Signs should have the word "Exit" (in the local language) in plain legible letters not less than 6" high and ¾" wide, or conform to the country standards.
- ❑ Exit doors must be side hinged swinging type and shall swing in the direction of the flow of exiting traffic.
- ❑ Exits should lead to a safe location.
- ❑ Exit routes should be marked with directional arrows in a highly visible contrasting color paint or tape on the factory floor. Exit aisles should be at least 44" / 112cm wide, unobstructed, and marked with a contrasting color tape or paint. Aisles throughout the factory should be marked with two lines to indicate the areas to be kept clear.
- ❑ Emergency evacuation route maps should be posted at each end of the factory floor and should be up-to-date, corresponding to the designated exit routes marked on the factory floor, should be drawn from the viewers perspective, and should have a "you are here" locator noted. Maps and evacuation instructions should be written in the local language including instructions for fire, earthquakes, bomb threats, strong storms, etc.
- ❑ Battery-operated emergency lighting should be in place throughout the factory, including halls and stairwells, and be in working order. (Fixtures should provide at least 90 minutes of emergency lighting.) The factory should regularly test all emergency lighting and keep maintenance records on hand.
- ❑ For factories with security mesh on outside windows, the local fire department should be consulted to determine how much accessibility is required for fire department rescue efforts.

**Stairways and Mezzanines:**

- ❑ Stairways with four or more steps should have a secure handrail on both sides.
- ❑ Stairs should be structurally sound and provide adequate width for safe exit.
- ❑ Stair heights should be no more than 8" / 20cm and step depths should be at least 10 inches / 25cm with a no-slip surface.
- ❑ Stairs should carry a minimum load of 1000 pounds.
- ❑ Guardrails on mezzanines should be installed to prevent objects from falling.
- ❑ Mezzanines should have sufficient ceiling height. (7-8 feet / 2-2.5m)
- ❑ Mezzanines must have at least 2 emergency egress routes.

**Fire Extinguishers:**

- ❑ A fire extinguisher should be within 75 feet / 23m of each worker. (class A, C, & D use) Class B use extinguishers should be within 50 feet.
- ❑ Extinguishers should be mounted on wall or post at eye level. The location of the extinguisher should be indicated by highly visible paint and a fire extinguisher sign in the local language. Access to the extinguisher should be unobstructed.
- ❑ Extinguishers should be of an appropriate class for the workplace.
  - Class A: For a fire involving ordinary combustible materials such as paper, wood, cloth, and some rubber and plastic materials.
  - Class B: For a fire involving flammable or combustible liquids, flammable gases, greases, and similar materials, and some rubber and plastic materials.
  - Class C: For a fire involving energized electrical equipment where safety to the employee requires the use of electrically nonconductive extinguishing material.
  - Class D: Means a fire involving combustible metals such as magnesium, titanium, zirconium, sodium, lithium, and potassium.
- ❑ Fire extinguishers should be inspected monthly, and serviced annually, with date of inspections indicated on attached tags.
- ❑ Training in fire extinguisher use should be properly documented and 100% of the workforce should be oriented as to the location and use of an extinguisher through demonstration or the distribution of instructional pamphlets.

**Alarm Systems and Emergency Preparation:**

- ❑ An alarm system should be in place along with an evacuation plan.
- ❑ Individual alarm switches should connect with the central system, be clearly marked, and be unobstructed.
- ❑ The fire alarm should be audible throughout the facility and should have a sound distinct from any other similar notice system.
- ❑ All alarm devices should be tested regularly by qualified personnel, preferably in conjunction with evacuation drills. Testing records should be maintained.
- ❑ The alarm must have a backup power source or there should be a secondary alarm system.

- ❑ All new personnel should be notified of the fire alarm system prior to beginning work.
- ❑ Fire drills (the practicing of an emergency evacuation procedure) should be conducted factory wide at least twice a year and be documented
- ❑ For facilities without sprinkler systems; smoke alarms must be installed. The battery change date should be noted on the alarm or in a check log. Alarms should be checked monthly for functionality and maintenance records on hand.
- ❑ Standpipe and hose systems must have a minimum water supply of at least 100 gallons per minute for at least thirty minutes. The hose must be equipped with a shutoff type nozzle. The hose should be inspected at least annually and the inspection record is to be kept on file.

## **2. Medical Care / Accidents:**

- ❑ There must be at least one quickly accessible, fully stocked First Aid kit per 100 employees. If the kits are locked to prevent theft, the keys should be readily accessible.
  - An inventory checklist should be posted inside the kit.
  - Supplies must be current.
  - The person responsible for the kits must be identified on the kit.
  - All items must be labeled and identified.
- ❑ Each first aid kit must contain at a minimum the following:
  - Bandages
  - Sterile gauze or cotton balls
  - Adhesive tape (plasters)
  - Disinfecting agent (antiseptic cleanser)
  - Antibiotic/antibacterial ointment
  - Sterile/surgical gloves
- ❑ Formal 1<sup>st</sup> Aid training is recommended for 1% of the factory personnel. (both male and female) Training and certification through an agency such as the Red Cross can be obtained and refresher courses can be repeated at regular intervals.
- ❑ The factory management must know where the closest medical center is located and have a procedure in place for safely transporting a worker there in an emergency.
- ❑ The factory should maintain an injury and accident investigation log that records all injuries.

## **3. Cleanliness:**

- ❑ General:
  - Floors must be dry and free of debris.
  - Factory and immediate area should be clear of debris and garbage.

- Buildings must be structurally sound and well maintained.
- Toilets:
  - Toilets should be clean, always accessible, and functional. They should provide appropriate privacy as well as running water, soap, and individual hand drying capabilities. There should be good light and ventilation in these areas.
  - Separate facilities for men and women. (clearly marked)
    - 1-15 persons - 1 toilet minimum
    - 16-35 persons - 2 toilets minimum
    - 36-55 persons - 3 toilets minimum
    - 56-80 persons - 4 toilets minimum
    - 81-110 persons - 5 toilets minimum
    - 111-150 persons - 6 + 1 additional toilets minimum for every additional 40 persons.
- Drinking Water:
  - Fresh potable water must be available for employees without restriction. Where multiple sources of water exist, potable water should be clearly identified. Water testing records should be maintained.
  - Use of a common drinking cup is prohibited.
  - Potable water must be provided for cooking, washing of foods, and washing of cooking and eating utensils.
  - Well or municipal water should be tested for bacteria as well as chemical, mineral, metal, or other contaminants.
- Cafeteria or Canteen:
  - Floors and surfaces should be clean.
  - Tables, dishes, and utensils must be sanitized between uses.
  - Food should be properly stored and handling practices should be sanitary, with no food left uncovered or stored in the open.
  - Food service workers should have current health certificates.
  - There should be adequate seating for the number of workers that need to use the cafeteria at the same time.
  - Control of insects should be maintained through fumigation or with insect traps.
  - The Cafeteria should provide protection from the weather.
  - All fire safety recommendations apply to the cafeteria.

#### **4. Equipment Safety:**

##### **Machine Safety:**

- Machinery should be equipped with safety devices such as needle guards for sewing machines, two-hand operation for die cutting / hole punching / pressing equipment, and automatic shut off switches for laundry extractors, etc.
- Machinery should be equipped with lock-out capability.

- ❑ Machines should be locked in OFF position before cleaning, unjamming, or machine repair has begun.
- ❑ Workers should be trained in safe work procedures before using machinery.
- ❑ Spilled water, grease, or materials should be cleaned up promptly.
- ❑ Only properly trained people should repair wiring or machinery.

**Electrical Hazards:**

- ❑ All wires should be free of splices and repairs using tape. Electric cords on smaller machines that are taped, cut, or spliced should be replaced.
- ❑ All cords must be continuous in length.
- ❑ All electrical equipment should be grounded.
- ❑ All permanent electrical wiring should be encased and properly identified. (ie Electricity - Danger)
- ❑ Factory should ensure that electrical panels are not overloaded.
- ❑ Electrical boxes should not have open fuse spaces. Inside wiring should be insulated from the outside.
- ❑ Electrical boxes should be maintained unobstructed. 36” cleared space around a box is recommended. A rubber mat below each box will minimize the potential of electrical shock.

**Boiler / Generator:**

- ❑ Boiler maintenance records must be maintained. Operating Permits must be maintained as required by local law.
- ❑ Boiler blow off pipes must evacuate outside of the boiler room. (away from direct contact with personnel)
- ❑ If the boiler is over a certain weight or size, it is required, in most countries, to be housed at a certain distance from the production area or outside the production building altogether.
- ❑ The Boiler should be maintained in a clearly identified restricted area.

**Elevators:**

- ❑ Elevator permits, in countries that require them, should be up-to-date.
- ❑ The shaft doors should be closed when the elevator is not in use. Doors should have safety locks to prevent door from opening while elevator is moving.
- ❑ The elevator cars should have gates or doors.
- ❑ There should be a sign posted near the elevator doors on each floor that indicates to use the stairs in the event of an emergency such as fire.

**4. Chemical Safety:**

- ❑ Chemicals should be stored in a safe, contained, well ventilated area.
- ❑ Chemicals must be stored and contained to prevent spillage into the environment.
- ❑ All chemicals should be clearly labeled in the local language.

- ❑ Workers who handle chemicals should be trained in their proper handling and storage.
- ❑ Workers should be trained in the reasons for use of appropriate Personal Protective Equipment. (PPE)
- ❑ The Material Safety Data Sheets (MSDS) of any potentially hazardous chemicals used in the factory should be posted in the areas where the chemicals are used and /or kept on file in the chemical storage area.
- ❑ An Emergency shower and eye wash station should be provided in areas of chemical storage or battery charging.

#### **5. Personal Protective Equipment (PPE):**

- ❑ Workers should wear, as needed, any factory-issued personal protective gear that is required for the task(s) they perform.
- ❑ Such gear includes: eye protection, ear protectors or ear plugs, dust masks, filtered breathing masks to protect against the inhalation of fumes or contaminated particulate, mesh gloves for cutting, protective boots or aprons, shoes, Etc.
- ❑ Shoes should be worn when working with electrical systems or machinery.
- ❑ Information should be posted in work areas instructing workers in the use of personal protective gear required for the area or task as well as warnings as to the potential health and safety risks of not using such gear.
- ❑ Workers should be trained in the use of personal protective equipment and the factory should enforce the use of protective equipment on the job as needed to protect the worker.

## **C. WORKING CONDITIONS:**

### **1. Air Quality / Ventilation:**

- ❑ Air in all production areas should be adequately fresh and free of fumes, dust, and fibers.
- ❑ Factory should maintain proper ventilation on the factory floor.
- ❑ The factory floor should be regularly cleaned.
- ❑ Receptacles should be provided to collect / remove scraps.

### **2. Temperatures:**

- ❑ In the U.S., factories are required to maintain an air temperature of between 60 and 86 degrees Fahrenheit (15 – 30 degrees Celsius) Borderline conditions are between 50 and 60 degrees Fahrenheit (10 - 15 degrees Celsius) and between 86 and 96 degrees Fahrenheit. (30 - 35 degrees Celsius) Temperature readings below 50 degrees Fahrenheit (10 degrees Celsius) and above 96 degrees Fahrenheit (35 degrees Celsius) **SHOULD BE AVOIDED.**
- ❑ In particularly hot countries, the temperature should be maintained at a reasonable level for the area.

### **3. Noise Levels:**

- ❑ Noise that is higher than 85 decibels can cause damage to a worker's hearing and requires ear protection.
  - 85 – 90 decibels                      recommended
  - 90 – 95 decibels                      required
  - 95 + decibels                          hearing protection required and noise reduction action taken

### **4. Lighting:**

- ❑ Lighting guidelines (U.S. Dept. of Labor)
  - Emergency egress                      75 lux                      10 foot candles
  - Production line                          350 - 500 lux              30 - 50 fc
  - Inspection                                  750 lux                      70 fc
  - General Warehouse                      350 lux                      30 fc
  - Clerical work                              750 lux                      70 fc
  - Corridor / Stairs                          200 lux                      20 fc.

## **D. WORKER DORMITORIES:**

The Health and Safety guidelines for production facilities should be applied to dormitories as well. Some additional recommendations for dormitories are as follows:

- Dormitories must be clean, secure, adequately lit, adequately heated / cooled, and have good ventilation.
- At a minimum, each worker in the dormitory should have 50 square feet of living space or the amount required by local law.
- Restrictions on dormitory residents (curfews) must be judged to be reasonable in the context of legitimate concerns for personal safety. All workers, including contract workers, should be allowed to leave the dormitories at will, except in those cases where there is reasonable concern for their personal safety, in which case the factory should provide transportation to the worker's desired destination.
- Fire Safety:
  - Many dorms are built with 1 central staircase. In this scenario, there needs to be 3 exits per floor – 1 central plus 1 additional at each end of the building.
  - An emergency evacuation diagram should be placed on each floor along with instructions for fire, severe weather, earthquakes, etc. (as appropriate for the location)
  - Exits must lead to a safe location.
  - Exits must remain unlocked from the inside at all times.
  - Exits must be clear.
  - There must be at least 1 smoke detector per floor (if the dormitory hallway is open / not enclosed, the 1 smoke detector in each dorm room is required)
  - An audible fire alarm must be in place.
  - A fire extinguisher must be within 75 feet of each bed.
  - Battery operated emergency lighting must be in place.
  - Battery back-up illuminated exit signs should be at each exit.
  - Fire drills (the practicing of an emergency evacuation procedure) should be conducted at least twice a year and be documented
  - Cooking is allowed only in designated kitchen areas.
- A properly stocked First Aid kit should be available.
- Toilets must be lit at night.
- Residents must have access to:
  - Running water
  - Showers (or bathing area)
  - Safe drinking water
  - Secure lockable storage for personal items

- Toilets and Shower areas should be designed to provide an appropriate level of privacy.

## **E. FACILITY SECURITY**

### **1. Policy**

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

The supplier must comply with all domestic laws, rules and regulations governing the sale, use, or shipment of contraband. Also, the supplier will cooperate with local, national, and foreign customs agencies to guard against the illegal shipment of contraband.

### **2. Procedural Security**

- Procedures should be in place to protect against unmanifested material being introduced into the supply chain.
- Security controls should include:
  - The supervised introduction/removal of cargo
  - The proper marking, weighing, counting and documenting of cargo; verified against manifest documents
  - The detecting/reporting of shortages/overages
  - Procedures for verifying seals on containers, trailers, and railcars.
  - The movement of incoming/outgoing goods should be monitored.
  - Random, unannounced security assessments of areas in your company's control within the supply chain should be conducted.
  - Procedures for notifying Customs and other law enforcement agencies in cases where anomalies or illegal activities are detected, or suspected, by the company should also be in place.

### **3. Physical Security**

- All buildings and rail yards should be constructed of materials, which resist unlawful entry and protect against outside intrusion.
- Physical security should include:
  - Perimeter fences
  - Locking devices on external and internal doors, windows, gates
  - Fences, adequate lighting inside and outside the facility,
  - The segregation and marking of international, domestic, high-value, and dangerous goods cargo within the warehouse by a safe, caged or otherwise fenced-in area.

#### **4. Access Controls**

- ❑ Unauthorized access to facilities and conveyances should be prohibited.
- ❑ Controls should include: positive identification all employees, visitors, and vendors.
- ❑ Procedures should also include challenging unauthorized/unidentified persons.

#### **5. Personnel Security**

- ❑ Companies should conduct employment screening and interviewing of prospective employees to include periodic background checks and application verifications.

#### **6. Education and Training Awareness**

- ❑ A security awareness program should be provided to employees including:
  - The recognition of internal conspiracies
  - Maintaining cargo integrity
  - Determining and addressing unauthorized access
  - These programs should offer incentives for active employee participation in security controls.

#### **7. Manifest Procedures**

- ❑ Companies should ensure that manifests are complete, legible, accurate, and submitted in a timely manner to Customs.

#### **8. Conveyance Security:**

- ❑ Conveyance integrity should be maintained to protect against the introduction of unauthorized personnel and material.
- ❑ Security should include:
  - The physical search of all readily accessible areas
  - The securing of internal/external compartments and panels
  - Procedures for reporting cases in which unauthorized personnel, unmanifested materials, or signs of tampering, are discovered