



Westtex Apparel El Salvador: Report on the Status of Remediation/Corrective Action Plan

January 27, 2026

Background

On March 16, 2023, the Fair Labor Association (FLA) initiated the Third Party Complaint (TPC) process against Westtex Apparel S.A de C.V. (the factory) after the Federación de Asociaciones y Sindicatos Independientes de El Salvador (FEASIES) filed a formal complaint with FLA. FLA Participating Companies Next Level Apparel and '47 Brand were sourcing from Westtex when FEASIES filed the TPC.

FEASIES alleged several labor violations related to freedom of association, terminations and retrenchment, compensation, nondiscrimination and employment relationships. The main allegations centered on:

- The illegal dismissal of three union leaders of the union Sindicato de Trabajadoras y Trabajadores de la Industria del Trabajo Textil (SITTEX) in early January 2023;
- The lack of constructive industrial relations that has prevented dialogue with representatives from the union sectionals affiliated with FEASIES;¹
- Payment inconsistencies for workers' first three days of medical leave; and
- Discriminatory practices against LGBTIQ+ workers based on their gender identity and sexual orientation.

The investigation

FLA hired an independent investigator, Margarita Estrada, who conducted an on-site visit to the factory from March 27-30, 2023 and corroborated each of FEASIES's allegations. The investigation also revealed new findings such as the illegal dismissal of two union leaders in 2021 and the inadequate and unsafe conditions of the factory's lactation room for breastfeeding workers.

With this Third Party Complaint, FLA had the unique opportunity to investigate possible acts of discrimination based on sexual orientation and/or gender identity. The investigator corroborated the discriminatory practices affecting LGBTIQ+ factory workers and noted that they are subjected to derogatory verbal statements about their physical appearance and behavior.

¹ SITTEX union, Sindicato de Trabajadoras y Trabajadores de Industria Maquiladora, de Comercialización, Servicios y Afines de El Salvador (SITRAIMES union), and Sindicato de Trabajadores de la Industria del Vestir de El Salvador (STIVES union)

Prior to the completion of the investigation report and following the intervention of the Ministry of Labor, the factory reinstated two of the SITTEX union leaders dismissed in January 2023 - one was reinstated on March 29, 2023, and the second on April 1, 2023. However, at that time, they did not receive back pay for the wages owed since the date of their dismissal.

The investigation report was published on May 18, 2023.² With this publication, the remediation phase of the Third Party Complaint (Step 4) began.

The remediation process: Documentation and communication between parties

FLA strongly believed that the remediation process created an opportunity for the factory to implement the sustainable changes recommended in the investigation – in particular due to the leadership of the brands involved. In addition, the remediation process would be crucial for addressing the factory's anti-union practices and the strengthening its industrial relations.

However, the remediation process was full of challenges, and while the reinstatement of the first two union leaders was achieved relatively quickly, the factory showed inconsistencies in implementing the remaining recommendations. This is why the remediation process has dragged on for so many months.

FLA received the first version of the Corrective Action Plan (CAP) with evidence of implementation of the remedial actions on July 20, 2023. FLA provided feedback to the brands on August 3 and provided an assessment of the remediation status of each of the proposed corrective actions based on the evidence presented at that time.

In subsequent interactions, FLA and the brands exchanged messages and held calls to address challenging aspects of the remediation process, namely:

- The conditions of the reinstatement of the dismissed union leaders in 2023;
- The follow-up and results of the legal proceedings initiated by the dismissed union leaders in 2021; and
- The follow-up on the Ministry of Labor's intervention regarding multiple allegations filed by FEASIES against the factory, such as conciliation hearings and the inspection processes.

FLA maintained regular communication with FEASIES to verify the progress of the remediation process. The regional director for Latin America even held a meeting with FEASIES representatives in San Salvador in November 2023.

By the end of December 2023, Next Level Apparel had a staffing change and there was a gap in follow up on this investigation. Things moved slowly for a couple of months until new staff was assigned to the case. During this transition, 47 Brands took the lead in the remediation process and communication with FLA.

² See full report here <https://www.fairlabor.org/reports/westtex/>

In February 2024, the brands and FLA had a call to review a new CAP update. FLA again provided written comments to the brands on March 5, 2024. FLA noted that, despite progress related to creating and updating certain policies and procedures, it was concerned about the lack of compliance with the investigation's recommendations on freedom of association; industrial relations; communication and training to workers, supervisors, and middle management on different management functions; and payment of the first three days of medical leave. The brands were committed to prioritizing these issues and ensuring progress in their implementation. In subsequent months, FLA and the brands maintained regular communication.

On March 20, 2024, FLA updated its website indicating the remediation progress made in the investigation process, highlighting the achievements on freedom of association with the reinstatement of the five union leaders and subsequently the full payment of the wages owed since the date of their dismissal.

In November 2024, FLA notified the brands of some problems reported by FEASIES regarding the dialogue table meetings – specifically, that the factory convened these meetings in fast food restaurants (see additional information on page 12). FEASIES expressed its dissatisfaction to the factory about this decision and offered alternatives. As of the date of this report, these conditions have not changed.

FLA's recommendations and remediation

FLA received the final version of the CAP on February 20, 2025, after having held a previous conference call in January 2025. FLA reviewed all information provided by the brands and has reached the following conclusions regarding the remediation status of the CAP:

Table 1: Recommendations to Westtex Apparel S.A de C.V.

No	Recommendation	Remedial Actions	Status
1	Implement an annual review process with input from workers of all policies, procedures, and their implementation to ensure they meet legal requirements and the FLA Workplace Code of Conduct.	The factory updated its Employment Relations policy. It implemented a process to revise its workplace rules on an annual basis and ensure consultation with workers and their representatives. FLA recommends ensuring that worker representatives have a role in this process.	Completed
2	Consider adding a compliance specialist/professional to the management team to further support and implement initiatives that align the factory's practices with applicable laws and international standards on social compliance.	The factory hired an external consultant to help with sustainable improvements to ensure compliance with not only the TPC recommendations, but also customer standards and applicable laws.	Completed
3	Complement the content on the retrenchment policy/procedure to include: 1. Consultation with worker representatives prior to when a final decision is made; 2. Guidelines to develop a plan on retrenchment aimed at mitigating negative	The factory created this policy in November 2023 and it complies with requirements 1-6. There is no evidence of action 7, despite the fact that the factory has drafted specific templates for each type of termination.	In progress

No	Recommendation	Remedial Actions	Status
	<p>impacts on workers and their communities;</p> <p>3. An acknowledgement of legally protected groups;</p> <p>4. A form to communicate its plan (recommendation 2) to workers and its representatives and allow for communication channels for workers to ask questions and provide feedback;</p> <p>5. A description of the severance calculation process, depending on the type of termination of contract;</p> <p>6. A list of which records are created (so that the factory can document proper implementation of retrenchment/termination procedures); and</p> <p>7. An update to the language on severance payment forms and other templates, where workers sign to release their right to access severance payments.</p>	<p>Additional comments:</p> <ul style="list-style-type: none"> In requirement 4, where protected groups of workers are referenced, please note that Article 30-A of the Salvadoran Labor Code does not exclusively refer to pregnant workers. The brands have mentioned the factory will review this language in the next round of policy updates. Regarding severance calculations, the provided example does not demonstrate compliance with ER. 15.4.1, particularly in cases where advance termination payouts have been made by the factory. 	
4	<p>Complement the content on its grievance policy/procedure to include:</p> <ul style="list-style-type: none"> Each grievance channel's characteristics and availability; A description of the investigation process and the team/committee that oversees this process; A template to track grievances and their status; and A description of the grievance channels available for workers to report concerns or issues related to termination and severance payments. 	<p>The factory has clearly identified and described its existing grievance channels. The current mechanisms include the suggestion box, open-door policy, "mesas de diálogo"³, and the workers' committee. Additionally, the factory has a specific procedure for addressing cases of gender-based violence a commitment to develop specific procedures for each mechanism.</p> <p>Each mechanism includes a brief explanation of the investigation process; and a list of the personnel involved in handling each grievances mechanism.</p> <p>The factory has developed a system to track grievances. Although the evidence it submitted to FLA does not include specific text for reporting concerns or issues related to termination and severance payments, the scope of the document suggests that these issues can be addressed through the available grievance channels.</p>	Completed

³ "Mesas de diálogo" are periodical meetings of workers' representatives and Human Resources or other senior management representatives to discuss and seek solutions to workplace issues or worker grievances.

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5	Develop a systematized performance review process, ensuring objectivity, relevance, and fairness in its application.	<p>The factory submitted a copy of the performance evaluation, a performance evaluation template, and evidence of the induction training provided to the workers. Key comments note the following:</p> <ul style="list-style-type: none"> • The existence of a performance evaluation system has been well documented. • There are no subjective criteria outlined for evaluating worker performance. • No evidence has been provided regarding the factory's engagement with worker representatives in the development or implementation of the performance evaluation process. • While the factory has included the performance evaluation policy in the induction training (as topic number 15), the training covers an additional 27 topics. Therefore, there is no clear evidence that workers have been adequately trained on this specific policy and its evaluation criteria. 	In progress
6	Complement the content on the permit procedure to include steps for union officials to request an absence permit.	<p>Based on the documentation review (absenteeism, medical leaves, and work permit procedure) FLA corroborated that:</p> <ul style="list-style-type: none"> • The procedure outlines the specific steps for union officials to obtain a union related license to attend union-related activities; and • As stated in the procedure, if the required steps are followed, union officials will receive payment for their weekly rest day (séptimo). 	Completed
7	<p>Complement its policy and procedures on freedom of association and collective bargaining, defining:</p> <ul style="list-style-type: none"> • The process to identify and recognize trade unions and their union officials; 	The factory updated its policies and procedures concerning freedom of association in accordance with FLA recommendations.	Completed

No	Recommendation	Remedial Actions	Status
	<ul style="list-style-type: none"> The process to engage and allow communication and feedback with union officials; A dispute resolution process; Mesas de diálogo frequency and guidelines for implementation; Language on the commitment to align factory actions with non-interference and neutrality, not favoring one trade union over another; and A commitment to refrain from and not tolerate any acts of discrimination, intimidation, and anti-union activities. 		
8	Review and update documents where clothing and appearance restrictions are not solely based on health and safety requirements.	The factory's dress code procedures were reviewed, making sure that clothing and appearance restrictions are based solely on health and safety requirements.	Completed
9	<p>Provide worker training on the following topics:</p> <ul style="list-style-type: none"> Freedom of association and collective bargaining; to be provided by an independent expert; Nondiscrimination and inclusion; and The disciplinary system and appeal process. 	<p>Regarding worker training on freedom of association, initially the training sessions were facilitated by the factory's social compliance consultant. There is no data of number of the workers that have been already trained. Nevertheless, the training materials were shared with the FLA, and the content is robust enough to comply with FLA recommendations. Now, the factory has engaged with an independent expert, and all workers will be trained in the first quarter of 2026.</p> <p>In addition, there is no evidence on training or refresh training on nondiscrimination and inclusion, or the disciplinary system for workers.</p>	In progress
10	<p>Ensure the head of human resources and her team, who engage with workers at the HR office, are trained on:</p> <ul style="list-style-type: none"> Freedom of association and collective bargaining (they will be provided with an external provider with subject matter expertise); Nondiscrimination and inclusion; and Conflict resolution. 	<p>Human resources managers attended a training on freedom of association convened by the Americas Group. Besides this, there is no evidence that the factory provided additional training on this topic to HR staff. Nevertheless, the factory has agreed on training the head of human resources and her team in the first quarter of 2026.</p> <p>There is no evidence of nondiscrimination and inclusion training for human resources managers and staff.</p>	In progress

No	Recommendation	Remedial Actions	Status
		Regarding conflict resolution and respectful treatment training, there is evidence confirming that these topics were covered in the May 2023 training modules where 21 individuals participated. ⁴	
11	<p>Provide training for supervisors to improve their people management skills, including the following topics:</p> <ul style="list-style-type: none"> • Freedom of association and collective bargaining (provided an external expert with subject matter expertise); • Nondiscrimination and inclusion; • Conflict resolution; • Worker respectful treatment; and • The disciplinary system. 	<p>Initially there was no evidence that the factory provides training on freedom of association and collective bargaining for supervisors. However, the factory has committed to address this situation and train its supervisors in the first quarter of 2026.</p> <p>Training on nondiscrimination and inclusion and the disciplinary system is pending.</p> <p>There is evidence confirming that conflict resolution and respectful treatment were covered in the May 2023 training modules, where certain supervisors also participated.</p>	In progress
12	<p>Develop an internal communications procedure, that describes:</p> <ul style="list-style-type: none"> • Ways in which the factory communicates policies and procedures; • Induction training topics; • How workers are informed, in writing, that a process has been initiated against them; • The types and frequency of communication to workers, such as meetings, trainings, presentations, pamphlets, loudspeaker announcements, etc; and • How the factory proactively requests worker feedback (through anonymous surveys, union official meetings, confidential grievance channels, an open door policy, focus groups, committee meetings, etc.) and how it acts on such feedback to proactively address issues on the workplace. 	<p>The factory shared a statement listing the communication channels, both internal and external, but did not set up a robust communication procedure as recommended by FLA.</p> <p>There is no evidence that workers have been properly communicated with and trained.</p>	In progress
14	Reinstate the remaining union official terminated in January 2023 and retroactively pay owed wages since	FLA corroborated that the three union officials were reinstated, reenrolled to social security, and	Completed

⁴ Participants included a plant manager, production manager, human resources manager, engineering manager, and administrative assistant; supervisors; payroll personnel; and technicians.

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	January 6, 2023, and up to the date of reinstatement, to the three workers.	received retroactive pay of all owed wages.	
15	Though the factory claims that one of the union officials voluntarily quit on January 6, a worker interview indicated that she signed the resignation letter in an environment of intimidation and coercion, and it was not her will or wish to end the labor relationship. For this reason, FLA recommends that the factory reinstate her as well as the other two union officials. The document review process confirmed that the three workers were under the legal protections for union officials at the time of dismissal.	The factory offered to reinstate this union official, and she accepted. Along with the other two union officials mentioned above, she received retroactive pay of all owed wages from the termination date up to the date she was reinstated and reenrolled in the social security system.	Completed
16	In regards to the two union officials terminated in 2021 in similar situation, FLA recommends that the factory reinstate them and pay owed wages in alignment with the court rulings issued in October and December 2022 respectively. This recommendation is based on the fact that workers were entitled to legal protection at the time of their dismissal.	Following a judicial order, the factory reinstated both union officials and retroactively paid their wages.	Completed
17	If a retrenchment process has to be implemented in the future, ensure it is carried out in alignment with internal procedures. Also ensure that proper records are maintained to prove a fair system was used to select workers, and that terminations are properly classified, supported, and paid in accordance with FLA's Code of Conduct and Compliance Benchmarks governing retrenchment.	The current termination and retrenchment procedures include steps to properly handle future instances of mass layoffs and terminations. The factory seems to be better prepared to face these events in compliance with local regulations and FLA standards.	Completed
18	Ensure there are effective confidential channels accessible for all workers.	Evidence has been provided for the following grievance channels: a suggestion box, an open-door policy, mesas de diálogo, and a workers' committee. There is that evidence the factory strengthened confidential channels for workers. However, there is no evidence of a "hotline" as an additional mechanism for collecting worker feedback.	Completed
19	Identify and recognize all trade unions present and proactively engage with them.	The factory provided the following evidence: <ul style="list-style-type: none"> Minutes from two meetings on October 18, 2024, and October 22, 2024, between the factory 	Completed

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		<p>and FEASIES along with three sectionals;</p> <ul style="list-style-type: none"> Minutes from one meeting on April 10, 2024, between the factory and five unions/seccionals; and Photographic evidence of meetings. <p>There is evidence that the factory has engaged in dialogue with some existing unions: SITRAIMES, SITTEX, STIVES, SITITEX, SGS, and SINDICOM. The evidence confirms that meetings with unions have been documented.</p> <p>The minutes mention the presence of a company lawyer, rather than an independent ombudsperson, to facilitate dialogue as initially recommended by FLA.</p> <p>There is no evidence that the factory respected the agreed upon frequency of union meetings and efficiency of the Dialogue Annual Plan, or even the effectiveness of the mesas de diálogo to resolve conflicts.</p> <p>FEASIES filed some concerns with regard the frequency and conditions of the engagement so those have to addressed through the direct engagement with management.</p>	
21	Establish an annual plan for implementing “mesas de diálogo.”. Begin such meetings as soon as possible with the involvement of an independent ombudsperson to facilitate the first three meetings.	The factory set up dialogue annual plans with unions, but there is no evidence that the factory has fully complied with them. The complainant has also reported some issues that have impacted the continuity and effectiveness of the “mesas de diálogo that the factory has not addressed and resolved.	In progress
21	Properly document trade unions’ information requests and the factory’s responses in each instance.	The factory keeps a record of each engagement with workers’ representatives.	Completed
22	Refrain from terminating union officials without due legal process.	The factory’s retrenchment policy excludes workers who are entitled fuero sindical protection from its selection criteria. However, it does not mention anything regarding the	In Progress

No	Recommendation	Remedial Actions	Status
		clauses around union officials' termination and prior legal authorization.	
23	Implement a consistent payment process for the first three days of medical leave issued by the Salvadorean Social Security Institute.	<p>The factory updated its procedures governing the payment of the first three days of medical leave. However, there is no additional information on the actions the factory has taken to prevent recurrence. For example, the factory could implement a mechanism for both workers and the factory to verify the submission dates of required documents.</p> <p>In addition, the Ministry of Labor's inspection results were not conclusive as to whether the documentation submitted by workers for medical leave payments was provided in a timely manner. As a result, the factory had the right to not pay the workers.</p>	In Progress
24	Retroactively pay for medical leave that had not been paid since March 2022.	FLA did not find evidence of outstanding payments.	Incomplete
25	<p>Ensure there are effective confidential channels accessible for all workers, including:</p> <ul style="list-style-type: none"> • Investigate and track grievances to closure; • Create a procedure to properly investigate the complaints (this can include the creation of a committee if deemed necessary); • Develop an accountability system for grievance mechanisms; and • Communicate the conclusion/closure of investigations to workers and their representatives. 	<p>Based on the latest CAP submitted, there are four grievance channels available for workers. In addition to the suggestion box, the supporting document identifies other mechanisms: an open-door policy, mesas de diálogo, and a workers' committee. Additionally, the factory has a procedure for addressing cases of gender-based violence. Although the document describing the grievance mechanisms references specific investigation procedures for each mechanism, the factory did not submit these procedures. Therefore, FLA cannot provide comments on their content.</p> <p>The submitted evidence indicates that the factory will investigate complaints, track grievances to closure, and communicate with workers. However, since the specific procedures for each mechanism have not been submitted, no comments can be made on the specific investigation procedures for each</p>	In Progress

No	Recommendation	Remedial Actions	Status
		<p>mechanism, or the development of an accountability system for the grievance mechanism.</p> <p>Regarding the finding of discriminatory practices against the LGBTIQ+ community identified in the assessment, there is no evidence to support that the factory has taken any actions taken to prevent this behavior. Therefore, FLA cannot provide comments.</p>	
26	Discipline supervisors responsible for worker mistreatment. Implement an appeals process and the inclusion of the third-party witness in the implementation of disciplinary actions. Request worker signatures on written warnings and provide workers with a copy.	<p>The grievance policy and procedures have been updated following FLA recommendations with:</p> <ul style="list-style-type: none"> • An appeals procedure for disciplinary actions; • A disciplinary action template; • And a portion of the internal rules and regulations document listing disciplinary actions. <p>It is important to mention that the timeframe for appealing disciplinary actions is unclear. The procedure states that workers have 48 hours to appeal after being notified, while the disciplinary action template—signed by workers—indicates a 15-day appeal period. This discrepancy could cause confusion for workers and may lead to appeals being submitted outside the correct timeframe.</p> <p>Additionally, evidence was presented showing that management and supervisors received training on conflict resolution on May 20 and May 27, 2023. However, there is no evidence of the factory taking disciplinary actions against verbal abusers or conducting any investigations to identify cases of verbal abuse.</p>	In Progress
27	Improve the privacy and sanitation conditions of the breastfeeding room.	The factory renovated its breastfeeding room, improving its privacy and sanitation.	Completed

For FEASIES, the reinstatement of the SITTEX union leaders dismissed in January 2023 was the major achievement of the TPC investigation. The factory agreed to the reinstatement and payment of wages owed to the three union leaders, even though prior to the investigation it had been reluctant to ensure the protection of these workers' fuero sindical.

FEASIES had high expectations that industrial relations between the factory and the union representatives would improve, but throughout the remediation process this did not happen as expected. FEASIES complained to FLA about the lack of effectiveness of the mesas de diálogo. The factory persists in its intention not to engage in serious and responsible dialogue with worker representatives. Throughout the remediation process the company has only met with union representatives on two occasions, and the meetings have taken place in fast food restaurants which indicates the company's lack of seriousness. Since October 2024 the factory and union have not met again, which goes against even the factory's own established norms for dialogue with union representatives.

The investigator in several of the remediation actions, and especially in the processes of creating and updating policies and procedures such as termination and retrenchment, freedom of association or even those related to discipline and performance evaluation, recommended involving or consulting with union representatives. The factory missed the opportunity to obtain feedback from union representatives and ensure better dissemination of new regulations with workers through the support of union representatives. FEASIES stated that the factory never made them aware of the new workplace rules that were updated based on the investigation recommendations.

In general, FEASIES stated that the factory's anti-union culture has not changed significantly after the investigation. Beyond the reinstatement of illegally fired union leaders, the factory has shown little interest in making sustainable changes to its culture and practices that limit the free exercise of freedom of association. The factory's legal counsel has been a determining factor in not advancing a constructive relationship with unions.

The payment of the first three days of medical leave has been a controversial issue throughout the remediation process of this investigation. The factory submitted inconclusive inspection reports from the Ministry of Labor regarding the legality of the company's actions in not paying the first three days of medical leave to the workers who reported this alleged illegality to the Ministry of Labor. The factory has attempted to avoid retroactive payment for the cases identified during the TPC investigation. Despite changes in policies and procedures regarding the payment of this benefit, the factory did not share evidence of how these changes have been implemented in favor of workers.

Regarding the reinstatement of union leaders whose dismissal processes were the subject of legal proceedings against the factory since 2021, the factory initially refused to have these workers reinstated. Pressure from the brands and court results in favor of the workers forced the factory to reconsider its position and to proceed with the reinstatement of the workers several years after their dismissal.

Finally, despite some initial changes, the factory still has not implemented clear rules and procedures to stop and prevent discrimination based on sexual orientation and/or gender identity against LGBTIQ+ workers.

FLA was ready to post the Report on the Status of Remediation/Corrective Action Plan in June 2025. Nevertheless, a two-month extension was given to the brands to ensure that the ongoing remedial actions could be implemented and reported before closing the TPC investigation. The

brands acknowledged that there were outstanding issues to be resolved with the factory and that they were in the process of getting final approval to proceed, including:

- Implementing quarterly trainings for all groups for the remainder of 2025;
- Building a 2026 quarterly training plan; and
- Identifying outside parties to administer the trainings on freedom of association, nondiscrimination and inclusion, a disciplinary system and appeals process, conflict resolution, and respectful treatment of workers.

The brands were confident that they could remediate these final areas to bring all parties together to shape the way forward. In November 2025, the brands reported back to FLA on concrete agreements with the factory to train Westtexas's entire workforce on freedom of association in the first quarter of 2026.

Finally, FLA has engaged multiples times with the complainant in-person in San Salvador in early October and most recently by email in late November. FEASIES has constantly reported that the factory has not changes its practices concerning freedom of association, nondiscrimination, and industrial relations. Moreover, the last mesa de diálogo with the complainants took place on October 2024, as the factory has not been willing to change the meeting location and is convening meetings after working hours, limiting workers' ability to attend.

FLA closed the case in late November 2025.

Conclusions and next steps

FLA's TPC mechanism was effective in reinstating and paying in full the wages owed to the five union leaders arbitrarily dismissed by the factory (three in 2023 and two in 2021).

As a result of this investigation, the factory created and updated its policies on terminations and retrenchments, a disciplinary system, freedom of association and industrial relations, and performance evaluations. While many of the advances have occurred at the documentary level, over the course of more than a year and a half of the remediation phase, the factory has been inconsistent in implementing these changes, communicating them to workers, supervisors and middle management, and providing training.

Industrial relations and freedom of association remain issues for improvement at this factory. Factory management needs to develop an appreciation of the benefits of establishing healthy and constructive labor relations with union representatives.

FLA encourages the factory to continue to invest in improving its social compliance practices and to follow FLA guidelines on key issues such as the payment of the first three days of workers' medical leave or the calculation and payment of workers' severance compensation in case of unjustified dismissal. It is also of utmost importance to take clear actions to prevent any type of discrimination in the workplace, especially for the LGBTIQ+ community in the factory. Above all, the factory should continue strengthening constructive dialogue with union representatives.

The brands will have a responsibility to remain vigilant of the implementation of the remediation actions that remain in progress or pending, and to continue investigating and addressing freedom of association and industrial relations issues as part of their due diligence at this facility.

Finally, special attention will be required to ensure factory's compliance with FLA's Benchmark ER. 15.4.1 regarding severance calculation, as this factory has the practice of advancing termination payouts and could be a future risk in the event of mass layoffs or eventually a factory closure.