

This immediate action process will be followed when an Inspection Firm (IF) has identified one or more significant indicators of structural, fire, or electrical safety risks which may pose a severe and imminent life danger to worker safety and/or the building structure.

While these circumstances are likely to be rare, a prompt and organized response in such an emergency is essential for the welfare of occupants.

Objective

The objective of this IDEP is to clearly define the required action by all parties to minimize life safety risks to building occupants when an emergency response is required due to severe and imminent life danger posed to the occupant of a factory being assessed.

Application

This protocol will be followed when a trained Inspection Firm has identified that a factory has a severe and imminent threat to worker or occupant safety. Any other concerns (from which no imminent threat is posed) will not trigger this section's emergency protocols.

A. Initial Determination and Communication Steps

1. Initial Determination: The Inspection Firm's lead assessor will make the initial determination whether issues discovered in the assessment may pose a severe and imminent danger to building occupants or workers. The IF's lead assessor will document the related findings on-site in the Severe Priority 1 Issues report accompanied with relevant photos and will seek acknowledgement of the factory management on the same.
2. Initial Communication: Upon initial determination, the Inspection Firm's lead assessor will immediately communicate the situation via phone to those in the following order:
 - a. LABS Country Manager (via phone) to be followed by an email with detailed Severe Priority 1 Issues report (including coordinates and relevant photos) in 24 hours
 - b. Inspection Firm's supervisor (via phone), to be followed by an email
 - c. Factory management on site, by calling an emergency meeting
 - d. Factory management and/or owner agrees to and acknowledges the imminent life danger to worker safety and/or the building structure based on the description provided by Inspection Firm (IF)
 - e. Factory informs all workers and their representatives
 - f. LABS Country Manager or appropriate LABS staff immediately contacts (on mail and/or call) the local Brands Participant(s) that are sourcing from the factory
 - g. LABS Country Manager or appropriate LABS staff visits the factory within 24 hours to review the report and facts presented by the Inspection Firm, possibly with the local brand representatives if they are available
3. The Inspection Firm's lead assessor shall also provide factory management with a description of the Severe and Imminent Danger Emergency Escalation Protocol

- (IDEP). If appropriate, the Inspection Firm's lead assessor shall make recommendations to the factory management and/or owner regarding appropriate response action, including temporary evacuation (either partial or full, as warranted) until an additional assessment can be undertaken by the appropriate Government or Governing Authorities.
4. While briefing factory management regarding the IDEP, the Inspection Firm's lead assessor should reference the need for factory to inform the relevant local authorities to determine the next steps. Subsequently, factory needs to inform the LABS Factory Coordinator and share copy of intimation sent to local authorities.
 5. The factory management and local authorities are responsible for ensuring safe working conditions once informed about the imminent danger and will leverage all available means to ensure workers' safety. Brand Participant(s) work with the factory, and other key stakeholders, for remediation on priority while LABS will also work with relevant experts and organizations to support the factory in remediation.
 6. Documentation: As part of completing the on-site assessment and prior to informing and discussing the severe and imminent danger found with the factory management, the Inspection Firm must document all factory information (including coordinates and relevant photos) in the Severe Priority 1 Issues report; sending these to the LABS team within 24 hours of the completion of the assessment.

B. Purpose of the Quality Assurance (QA) Firm

When an Imminent Danger Emergency Protocol (IDEP) of LABS program gets triggered based on assessment of the Inspection Firm (IF), there might be a possible scenario where factory questions and disagrees to the decision of the Inspection Firm (IF) to trigger IDEP Policy. Factory management and/or owner believes that structural, fire, or electrical safety risks in the factory does not pose a severe and imminent life danger to worker's safety and does not warrant factory's partial or full closure.

While these circumstances are likely to be rare, a prompt and organized response is needed to resolve this difference of opinion to ensure workers safety in the factory.

If disagreement is shown by the factory on triggering IDEP, LABS country team will call a meeting with QA Firm (listed under Article D), within 24 hours of the Severe Priority 1 Issues report receipt from the Inspection Firm.

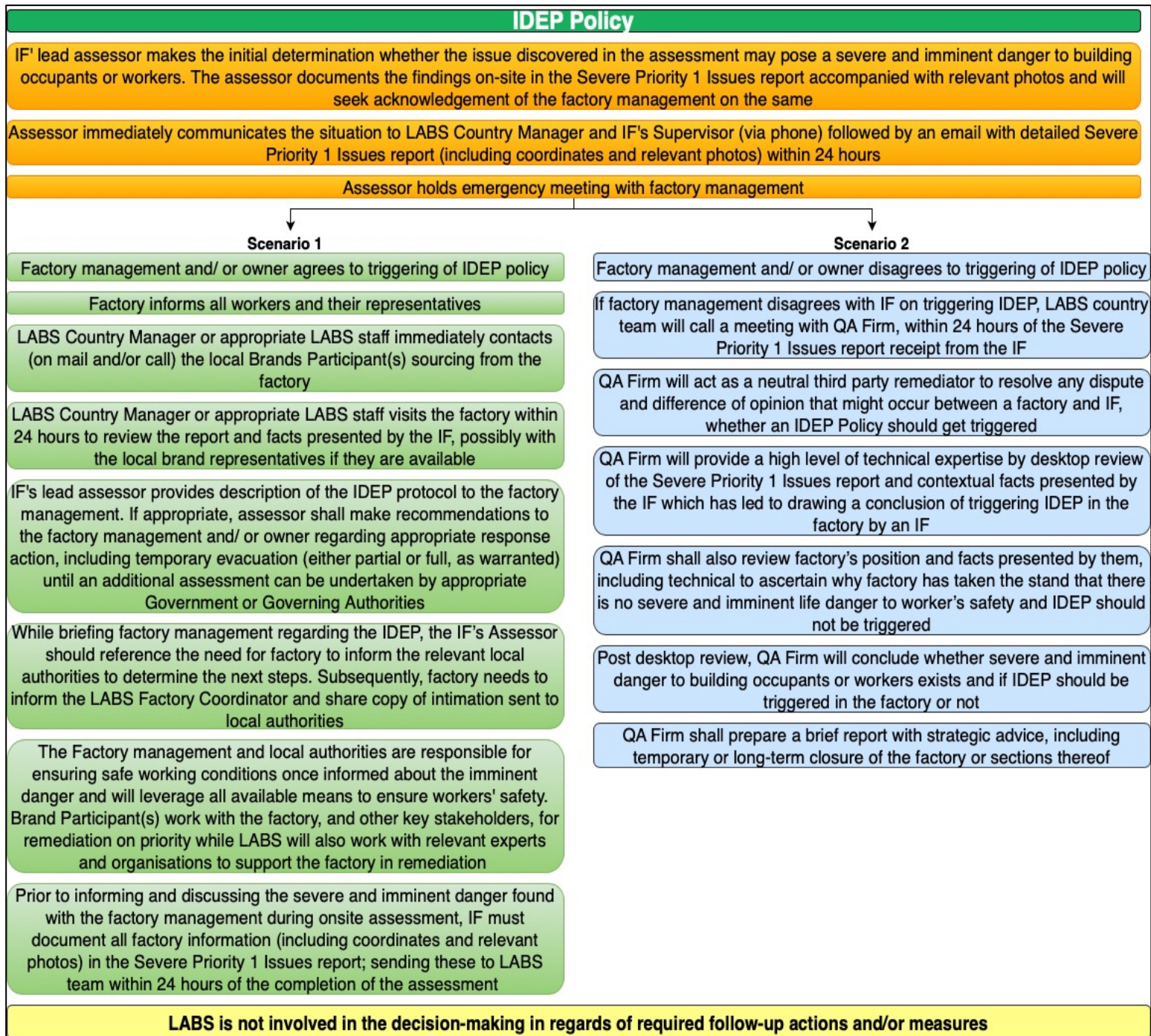
C. Role of Quality Assurance Firm

1. It shall be the function and purpose of the QA Firm to act as a neutral third party mediator to resolve any dispute and difference of opinion that might occur between a factory and Inspection Firm (IF), whether an IDEP Policy should get triggered.

2. QA Firm will provide a high level of technical expertise by desktop review of the Severe Priority 1 Issues report and contextual facts presented by the Inspection Firm (IF) which has led to drawing a conclusion of triggering IDEP in the factory by an Inspection Firm (IF).
3. The QA Firm shall also review factory's position and facts presented by them, including technical to ascertain why factory has taken the stand that there is no severe and imminent life danger to worker's safety and IDEP should not be triggered.
4. Post desktop review, QA Firm will conclude whether severe and imminent danger to building occupants or workers exists and if IDEP should be triggered in the factory or not.
5. QA Firm shall prepare a brief report with strategic advice, including temporary or long-term closure of the factory or sections thereof.

D. Quality Assurance Firm

Country	QA Firm
India	Bureau Veritas (India) Pvt. Ltd.
Vietnam	Bureau Veritas (Vietnam) Pvt. Ltd.



Glossary:

1. FC – Factory Coordinator
2. FM – Factory Management
3. IF- Inspection Firm
4. QA- Quality Assurance Firm
5. CAP – Corrective Action Plan