HEALTH & SAFETY
FIELD AUDIT
REPORT

Site: E.MIROGLIO EAD - Clarity

Address: Industrial Zone
Sliven 8800 - - Bulgaria

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Completed By: Irena GINEVA
Completed On: 14/02/2025

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SECTION RELEVANCY FOR YOUR ENTITY AND OPERATION

Choices of Assignees on what sections should be evaluated depending on their justifications (Comments and Documents shared).

Section Name	Response	Comment
High Hazard Activities	Relevant	

Practice in Place

	Score (Percentage)	Number of Required Practice Nonconformity*	Total Number of Nonconformity Practices
1. Governance	**100.00 %**	**0**	**0**
2. General Health & Safety	**100.00 %**	**0**	**0**
3. Occupational Safety	**100.00 %**	**0**	**0**
4. Emergency Safety	**100.00 %**	**0**	**0**
5. High Hazard Activities	**100.00 %**	**0**	**0**
Total	**100.00 %**	**0**	**0**

Audit Summary

Audit Summary (to be written after completing the below checklist)   E. Miroglio, a prominent player in the textile industry, is deeply committed to ethical business practices and sustainability. The company operates under a comprehensive Code of Ethics that emphasizes principles such as legality, equality, impartiality, transparency, professionalism, and environmental responsibility. This code serves as a guiding framework for all employees and stakeholders, ensuring that operations are conducted with integrity and respect for both people and the environment.

In line with its dedication to environmental stewardship, E. Miroglio has implemented measures to reduce its ecological footprint. The company has committed to eliminating harmful substances from its production processes, including the 11 priority groups identified by Greenpeace. This initiative reflects E. Miroglio's proactive approach to sustainability and its responsibility towards the environment.

Furthermore, E. Miroglio places a strong emphasis on social responsibility. The company ensures that its employees work in safe and healthy environments, fostering a culture of mutual respect and ethics. By maintaining full control over its production cycle and sourcing 95% of its fabrics from factories located in Europe, E. Miroglio upholds high standards of quality and ethical labor practices.

Through these comprehensive efforts, E. Miroglio demonstrates a steadfast commitment to ethical conduct, environmental sustainability, and social responsibility, solidifying its reputation as a responsible leader in the textile industry.

Nonconformity Action Plan Contact (Please put NA if no NCs are raised)

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Contact Phone Number

CLARITY HEALTH & SAFETY AUDIT CHECKLIST

1. Governance

		Practice in Place	Comments/ Observations	Reviewer Comments	Document	Common Practise
H.1.1	Does the organisation have policies that cover the following Health & Safety topics? ("Yes" for all, "Partially" for some, "No" for none)	Yes	Company is certified against ISO 45001:2018. All topics as described below are included in the policy.			It is generally accepted that robust policies can mitigate risks, enhance compliance, and prioritize employee well-being. A policy should define the scope, objectives, responsibilities, monitoring & verification procedures, qualitative and quantitative targets, key performance indicators to be implemented and monitored for each topic.
H.1.1_1	General Health & Safety	✓				
H.1.1_2	Occupational Safety	✓				
H.1.1_3	Emergency Safety	✓				
H.1.1_4	High Hazard Activities	✓				
H.1.2	Does the organisation have annual quantitative target(s) on Health & Safety?	Yes	Annual objectives and targets are available.			It is generally accepted that setting measurable targets for Health & Safety can help prioritize risk reduction efforts and drive continuous improvement in workplace safety practices.
H.1.3	If the organisation monitors its Health & Safety Key Performance Indicator(s) (KPIs), what progress did it achieve against its annual target(s) overall?	>=100%				It is generally accepted that monitoring health and safety KPIs helps to refine strategies and continuously improve safety outcomes.
H.1.4	Does the organisation include subcontractors/ suppliers Health & Safety statistics in the organisation's own Health & Safety policies and targets ?	Yes				It is generally accepted that incorporating subcontractor/ supplier data fosters a culture of accountability and promotes a holistic safety strategy, enhancing overall Health & Safety performance.

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H.1.5	Is the organisation's Health & Safety policy communicated to all employees such as employment contract, employee manual, newsletter/poster, intranet, website, employee training?	Yes	Policy is communicated - regular refresh trainings are performed to all employees.			It is generally accepted that utilizing multiple communication channels, such as newsletters, intranet, and employee training, will help reinforce the importance of Health & Safety policies and ensure better compliance among employees.
H.1.6	Is there a Health & Safety Officer, Committee, or equivalent, enforcing and implementing the organisation's Health & Safety policy and procedures?	Yes	As per local law Health and Safety committee is established and meets regularly every 3 months			It is generally accepted that a designated officer or committee is crucial for maintaining a culture of safety, reducing workplace accidents, and ensuring compliance with health and safety regulations.
H.1.7	Does the organisation provide regular training for employees on its Health & Safety policy and procedures?	Yes	At least annually and more frequent if any changes			It is generally accepted that regular training not only enhances employee safety but also promotes a culture of awareness and compliance within the organisation, reducing the risk of accidents and incidents.
H.1.8	Does the organisation conduct periodic assessments, audits or monitoring programs to verify whether it complies with its Health & Safety policy and procedures?	Yes	As per the procedure Ïnternal Audits -			It is generally accepted that periodic evaluations provide a structured approach to identify potential hazards, rectify compliance gaps, and promote a safer workplace environment.
H.1.9	Has the organisation established channels for employees to provide their feedback on Health & Safety topics such as union representative, employee committee, suggestion box, or dedicated phone number?	Yes	Suggestion boxes, requests to line managers, requests to EHS department			It is generally accepted that creating these channels not only encourages employees to share valuable insights but also helps the organisation proactively address Health & Safety concerns, ultimately improving workplace safety and overall employee satisfaction.

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H.1.10	Verify the implementation of the Health & Safety policy - Does the organization determine and have access to the compliance obligations related to its Health & Safety obligations? Does the organization verify its compliance?	Yes	Access to legal requirements through APIS and State Gazette. Assessment is done periodically and recorded. Last assessment - 08.11.2024 - no deviations			It is generally accepted that regular compliance verification and reporting mechanisms should be implemented to demonstrate the organisation's commitment to Health & Safety standards and regulations.
H.1.11	Verify the implementation of the Health & Safety policy - at minimum 1) are employees aware of the policy? 2) do they know where to find information on the policy? ("Yes" for all, "Partially" for some, "No" for none)	Yes	Workers are well aware of the policy, they know where it is located			It is generally accepted that effective policy implementation requires not only awareness but also easy access to information for employees to comply with policy requirement.

2. General Health & Safety

		Practice in Place	Comments/ Observations	Reviewer Comments	Document	Common Practise
H.2.1	Does the facility provide regular workplace health examination for employees free of charge?	Yes	Last health and safety examinations are performed in the period 14.10-25.10.2024 and 28.10-01.22.2024. Results are being summarised, analysis will be made upon completion.			It is generally accepted that providing free workplace health examinations can enhance employee morale, reduce absenteeism, and contribute to a healthier and more productive workforce.
H.2.2	If Personal Protective Equipment (PPE) is needed for workers, is there a procedure to manage the distribution, training, and usage of the PPE?	Yes	List of PPEs for 2024 Provided at the workplace and records are kept			It is generally accepted that effective PPE management not only safeguards worker safety but also promotes compliance and awareness, enhancing overall workplace safety culture.
H.2.3	Does the organisation provide health & safety induction to any visitor/guest (including client representatives) when on the organisation premises?	Yes	BV Team was also instructed on health and safety			It is generally accepted that providing health and safety inductions to visitors demonstrates a commitment to their well-being and helps mitigate potential risks, fostering a culture of safety and compliance.
H.2.4	Is housing provided to employees?	Yes	Housing is provided for immigrant workers at minimum cost.			

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H.2.5	Do all housing have all required legal approvals?	Yes	Housing is available for migrant workers and have all legal permits.			It is generally accepted that incomplete or lacking legal approvals can lead to potential legal and financial complications, making due diligence a crucial step in the housing acquisition process.

		Practice in Place	Comments/ Observations	Reviewer Comments	Document	Common Practise
H.2.6	Verify Health & Safety in practice - at minimum 1) Is PPE provided to visitors (if required)? Is an H&S induction provided to visitors (if required)? Are PPE used and maintained in good conditions? ("Yes" for all, "Partially" for some, "No" for none)	Yes	Yes, only for areas where required. All visitors are subject to health and safety instructions before entering production premises. PPEs provided are for single use and then disposed			It is generally accepted that regular monitoring and maintenance of PPE are essential to uphold a high standard of safety and prevent potential accidents or incidents.
H.2.7	Verify bathroom, toilets & changing rooms basic conditions - at minimum 1) Separate areas for women & men 2) Enough toilets per worker 3) Toilets in housing ("Yes" for all, "Partially" for some, "No" for none)	Yes	All sanitary premises were visited and it was confirmed that they are separated, clean, there is hot water and all required conditions.			It is generally accepted that gender-separated spaces are crucial for maintaining dignity and comfort. Inadequate toilet provisions may impact employee well-being and efficiency, warranting further investigation and improvements.
H.2.8	Verify other basic living conditions - at min. 1) Equal access to drinking water 2) Adequate living space per resident 3) No shared wall between housing and production/warehouse building [if applicable] ("Yes" for all, "Partially" for some, "No" for none)	Yes	Conditions provided are above the basic required. Confirmed through visit and worker interviews.			It is generally accepted that access to drinking water is a fundamental right, and ensuring the uniform enforcement of adequate living space policies are essential steps toward achieving a more equitable and sustainable society.
H.2.9	Verify good hygiene of - at minimum 1) Work site 2) Canteen & kitchen 3)Bathrooms & toilets 4) Changing rooms 5)Housing (housing if applicable); ("Yes" for all, "Partially" for some, "No" for none)	Yes	Hygiene is on very good level.			It is generally accepted that regular hygiene checks can prevent health issues and improve overall well-being. A clean environment can boost morale and productivity among workers.

		Practice in Place	Comments/ Observations	Reviewer Comments	Document	Common Practise
H.2.10	Verify lighting, ventilation and temperature of - at minimum 1) Work site 2) Canteen & kitchen 3)Bathrooms & toilets 4) Changing rooms 5)Housing (housing if applicable); ("Yes" for all, "Partially" for some, "No" for none)	Yes	Measurement of noise levels october 2024- there are deviations from legal requirements and measures are taken. Measurements - ventilatin, temprature dated March 2023 Lighting - February 2024 Dust - 2021			It is generally accepted that adequate lighting, ventilation, and temperature control are crucial for employee well-being and productivity. Maintaining these conditions not only ensures compliance with regulations but also fosters a better working environment.

3. Occupational Safety

		Practice in Place	Comments/ Observations	Reviewer Comments	Document	Common Practise
H.3.1	Does the facility conduct periodic inspections for occupational hazards present in the workplace?	Yes	Inspections are performed but are not documented			It is generally accepted that consistent inspections foster a safer work environment and compliance with safety regulations.
H.3.2	Are accidents reported and recorded?	Yes	An incident/ accident logbook is maintained. Last recorded accident is documented on 12.10.2024			It is generally accepted that an accurate and comprehensive accident data is crucial for identifying trends and improving safety measures.
H.3.3	Does the organisation investigate root cause for work related injuries/accidents?	Yes	Investigations are performed and records are kept			It is generally accepted that understanding the root causes can lead to proactive safety measures, reducing future incidents and fostering a safer work environment.
H.3.4	Does the organisation implement corrective actions after work related injuries/accidents?	Yes	As per the results of the investigations			It is generally accepted that analysing the root causes of injuries and accidents can provide valuable insights into areas where proactive safety measures and improvements can be implemented effectively.

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H.3.5	Does the organisation have procedures to protect personnel with higher health risk profile?	Yes	They are part of Health and safety management system - available to employees.			It is generally accepted that prioritizing the well-being of high-risk personnel not only safeguards their health but also enhances overall organisational resilience and fosters a culture of inclusivity.

		Practice in Place	Comments/ Observations	Reviewer Comments	Document	Common Practise
H.3.6	Verify Occupational Safety implementation - At minimum and dependent to the activities & site conditions: 1)Adequate safety equipment (harnesses, breathing equip., fire fighting equip., fire/smoke/gas detection systems, etc.) 2) Suitable safety signs	Yes	PPEs and safety equipment are available to people, in good condition and in stock also if they need to be replaced.			It is generally accepted that an adequate safety equipment ensures preparedness for emergencies and minimizes risks. Appropriate safety signs enhance hazard awareness and promote a safer work environment.
H.3.7	Verify Ocupational Safety implementation - At min. 1) Resources to manage medical incidents at site (i.e. first aid kits, defibrillator) 2) First aid kit available for every 100 workers, with basic supplies (i.e. bandages, scissors, gloves, gauze)	Yes	First aid kits are available and there is a medical person onsite employed by the company			It is generally accepted that regularly maintaining and replenishing medical resources is crucial for effective response to emergencies, ensuring worker safety. Adhering to recommended first aid kit ratios enhances the preparedness and responsiveness of occupational safety measures, reducing potential risks to workers.
H.3.8	Verify Ocupational Safety in practice - At min. 1) Well maintained facilities (free from notable cracks, mould and abnormalities that could result in structural damages) 2) Buildings built in compliance with local seismic standards (if applicable)	Yes	Factory premises are well maintained			It is generally accepted that a proactive facility maintenance reduces the risk of accidents and ensures a safe working environment. Adhering to seismic standards not only protects employees but also safeguards business assets during earthquakes in susceptible regions.

		Practice in Place	Comments/ Observations	Reviewer Comments	Document	Common Practise
H.4.1	Does the organisation have emergency preparedness procedures (including medical evacuation) in the event of an emergency?	Yes	Fire Safety - general rules			It is generally accepted that an effective emergency preparedness procedures are essential for safeguarding employees and mitigating potential crises, fostering a culture of safety and resilience within the organisation.
H.4.2	Does the organisation have a pandemic preparedness action plan?	Yes	Prepared and in place since 2020			It is generally accepted that a well-structured plan ensures resilience in the face of future pandemics, safeguarding both employees and business continuity.
H.4.3	Did the organisation obtain or have access to necessary fire safety permits for its facilities?	Yes	All are in place, well maintained and tested.			It is generally accepted that compliance with fire safety permits is essential for ensuring the safety and legality of the organisation's facilities.
H.4.4	Does the organisation have fire fighting and fire detection equipment installed?	Yes	All premises are equipped with fire detection and fire fighting equipment			It is generally accepted that implementing comprehensive fire safety measures and installation of firefighting and fire detection equipment ensures a fire-safe environment.
H.4.5	Does the organisation conduct periodic inspections or maintenance for fire safety equipment?	Yes	Fire-signalling and firefighting systems. Performed by external company on annual basis- last inspections performed in October 2024. Additionally portable fire extinguishers are checked annually by external company and on monthly basis internally by authorised personnel. Last external inspection is performed in September 2024, internal - October 2024.			It is generally accepted that a properly maintained fire equipment is essential for safeguarding against fire hazards and ensuring the safety of employees and assets.

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H.4.6	Does the organisation hold periodic emergency evacuation tests or drills?	Yes	Last practical training performed in the period 01.12-15.12.2023. Relevant documents are available.			It is generally accepted that regular drills not only enhance response efficiency but also familiarize employees with emergency procedures, minimizing panic during real emergencies.

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H.4.7	Verify Emergengy Safety implementation - at min. 1) Fire safety equipment easily accessible without any issue/blockage 2) Emergency exits free from any blockage and kept unlocked all times ("Yes" for all, "Partially" for some, "No" for none)	Yes	Well placed, accessible, periodically tested by external companies.			It is generally accepted that an accessibility to fire safety equipment is a critical aspect of emergency preparedness and should not be compromised. Maintaining unlocked and unobstructed emergency exits is essential to expedite evacuations during emergencies.
H.4.8	Verify Emergengy Safety implementation - at min. 1) Clearly identified emergency exits on each floor & working areas (in local language) 2) Evacuation plans with "you are here" mark at regular intervals ("Yes" for all, "Partially" for some, "No" for none)	Yes	Identified, marked with relevant signs, evacuation plans are correctly positioned			It is generally accepted that a clearly marked emergency exits facilitate quick and efficient evacuation during emergencies. Providing "you are here" marks on evacuation plans can enhance employee or occupant understanding of their current location in case of an emergency, improving response time.
H.4.9	Verify Emergengy Safety in practice - Is there an alarm system that exists and is audible throughout the facility and has a distinct sound that is different from any other noise notification?	Yes	Confirmed by workers			It is generally accepted that a unique alarm sound helps avoid confusion during emergencies, enhancing response time and overall safety.
H.4.10	Verify Emergengy Safety in practice - Are evacuation paths identified and marked throughout the facility up to the emergency exits?	Yes	tested by auditor during site visit in production			It is generally accepted that a clearly marked evacuation paths help occupants navigate safely during emergencies, reducing the risk of panic and improving overall emergency response effectiveness.

		Practice in Place	Comments/ Observations	Reviewer Comments	Document	Common Practise
H.5.1	Has the organisation implemented Health & Safety procedures for workers in handing hazardous materials or substances, that includes transportation, storage, and disposal?	Yes	Procedures are available and known by workers.			It is generally accepted that implementing robust Health & Safety procedures minimizes risks, safeguards employee well-being, and demonstrates commitment to environmental responsibility, enhancing organisational reputation.
H.5.2	Does the organisation provide periodic training to workers on hazardous materials or substances safety?	Yes	Part of the health and safety periodical training (on quarterly basis).			It is generally accepted that periodic training fosters a culture of safety, reducing accidents and potential harm associated with hazardous materials.
H.5.3	Does the organisation have Material Safety Data Sheet (MSDS) for all hazardous materials or substances within the premise, in languages understood by employees ?	Yes	Verified Dying department			It is generally accepted that providing MSDS in accessible languages enhances hazard communication, empowers employees to make informed decisions, and fosters a safer work environment.
H.5.4	Does the organisation conduct periodic inspections or maintenance for machineries and working equipment?	Yes	Annual trainings on electrical safety - 06.08.2024			It is generally accepted that regular inspections and maintenance can prevent costly breakdowns and promote a safe working environment.
H.5.5	Does the organisation conduct periodic inspection or maintenance for electrical fittings (wires, switch boards, electrical panels, etc.)?	Yes	On a monthly basis done by the assigned personnel. Last inspection done in October 2024			It is generally accepted that regular checks and maintenance routines are essential to identify and address electrical issues promptly, reducing the risk of accidents and ensuring the longevity of equipment.

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H.5.6	Are there safety operating procedures for all special equipment operators (forklift driver, cargo lift driver, boiler operator, electrician, hot work)?	Yes	Safety instructions: loading-unloading activities; cranes; lifting equipment; boilers; pressure equipment; electrical safety;			It is generally accepted that an effective safety procedures not only protect employees but also enhance overall workplace efficiency by reducing accidents and downtime.

		Practice in Place	Comments/ Observations	Reviewer Comments	Document	Common Practise
H.5.7	Verify High Hazard Activities implementation - Are hazardous materials or substances stored according to company safety protocol, i.e. secondary containment, labelling, storage condition and chemical compatibility?	Yes	verified in warehouses as well is in production areas, appropriate PPEs are available, information on storage, usage, health and safety and emergency			It is generally accepted that proper storage of hazardous materials is crucial for preventing accidents, protecting worker health, and safeguarding the environment. By adhering to stringent safety protocols, companies can minimize risks and ensure a safe and compliant workplace.
H.5.8	Verify High Hazard Activities implementation - Does the organisation provide eye wash/shower stations near hazardous materials or substances storage and usage area(s)?	Yes	Dying department requires availability of eye wash and they are provided			It is generally accepted that properly located eye wash/shower stations are crucial for immediate response in case of accidents, enhancing workplace safety and compliance with high hazard activity protocols.
H.5.9	Verify High Hazard Activities implementation - Does the organisation provide suitable safeguards for moving parts, or potentially dangerous parts on equipment?	Yes	As per technical specification of machines and producer instructiins			It is generally accepted that by implementing comprehensive safeguarding measures for equipment with moving or hazardous components establishes a safe working environment and ensure employee safety.
H.5.10	Verify High Hazard Activities implementation - Are there lock out - tag out (LOTO) procedures in place for all dangerous machinery (if applicable)?	NA	No machinery requiring LOTO is used in the production process.			It is generally accepted that implementation of LOTO procedures reduces the risk of accidents associated with high hazard activities.

		Practice in Place	Comments/ Observations	Reviewer Comments	Document	Common Practise
H.5.11	Verify High Hazard Activities in practice - Is the environment safe for workers to operate the equipment (i.e. enough lighting, proper humidity, dry floor, etc.)? ("Yes" for all, "Partially" for some, "No" for none)	Yes	Yes, as per results from measurements performed by external authorised company			It is generally accepted that a safe environment minimizes the risk of accidents and enhances productivity in high hazard activities.

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is a suite of solutions that
helps clients to manage
sustainability related data
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progress against their
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