

## International Accord – Procedure in relation to Extensions to Accord/RSC covered factories

### 1. Identifying Newly Built Extensions

The Factory Disclosure Protocol stipulates that each signatory company is obliged to update its Factory List within one month of any Factory becoming active, inactive, or undergoing extension. The appendix of the Factory Disclosure Protocol defines a factory extension (“extension”) as “any addition of any new floor, roof level, horizontal floor, or new structure”.

To be considered an extension, the new floor, roof level, horizontal floor, or new structure must be located at the same address and operate under the same trade license as the original covered factory. The extension is not always or necessarily attached to the original building: often the extension will be a separate shed; it could even be, for example, that there is a brick wall between the two buildings which is intended to be removed at some future date, but in the meantime, employees walk around it to move between the two buildings.

The RSC may be informed about a newly built extension to a covered factory by:

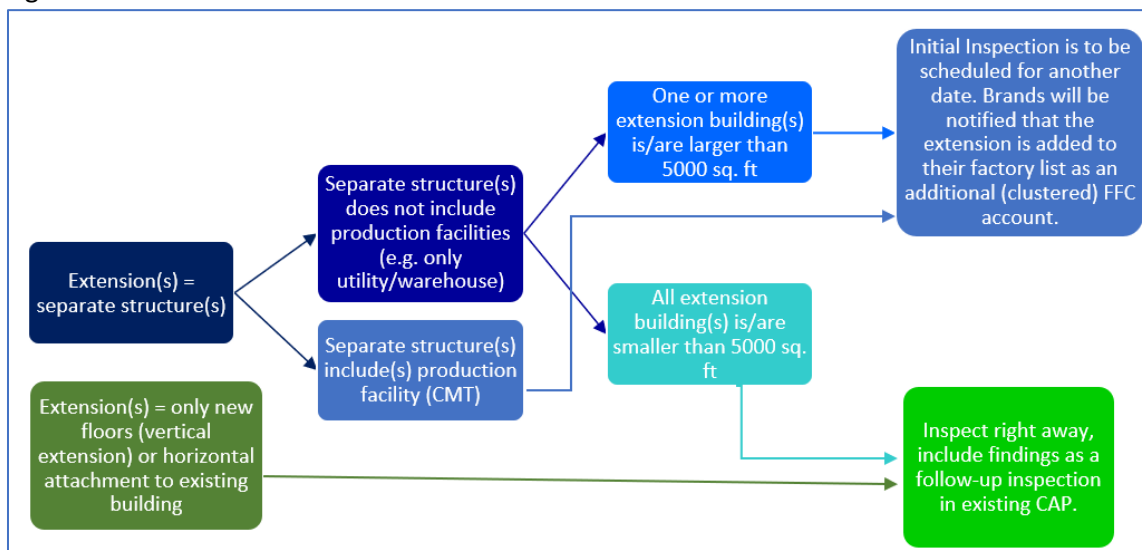
- RSC Engineers discovering the extension during an on-site inspection visit;
- RSC Case Handlers hearing about an extension from the factory itself or one of the responsible brands; or
- Brands reporting the extension directly through an update to their factory list in FFC.

### 2. Determining the Required Follow-Up

If, during the Initial Inspection, the RSC Engineers identify structures which were not reported by the responsible brand(s)/factory, the RSC will schedule further visits to complete the Initial Inspection at all structures in the premises that are used by the factory. In such a case, the newly identified floor, roof level, horizontal floor, or structure will be considered part of the original covered factory, not listed as a separate extension.

However, if the extension is identified by RSC engineers during a later on-site visit (i.e. not during the Initial Inspection), the RSC will investigate further, through correspondence with the factory and/or responsible brands, whether this extension requires a dedicated Initial Inspection, or whether a Follow-Up inspection is more appropriate, following the criteria from the flowchart below.

Figure 1: Flowchart for extension facilities



An exception to the above flowchart can be made at the discretion of the RSC engineers. If the extension building is smaller than 5000 sq. feet and/or that is used for non-CMT purposes – *and significant structural, electrical or fire safety concerns are found there* – the engineer can recommend to the Case Handler that this extension merits a dedicated Initial Inspection.

### **3. Resulting FFC Account IDs**

If the extension needs a dedicated Initial Inspection and therefore a separate Account ID in FFC, that ID will be linked to the Account ID of the original building(s) through the 'Clustered Account ID' field.

The International Accord Secretariat would subsequently inform the responsible brand(s) about the identified extension and that the extension(s) are added to their factory list in FFC. It should be noted in this regard that clustered accounts (main building + extensions) will be counted *as one factory* for the signatory brand.

In order to ensure consistent follow-up, the Case Handler of the original building is also assigned for the additional structure(s), so that all parts of the same factory are managed by one Case Handler.

### **4. Brand Responsibility**

Brands are responsible for all extensions to their active factories and for extensions to factories for which the brand is 'Inactive Responsible'. Clustered Account IDs are also linked in the escalation protocol, meaning that escalation letters will apply to all parts of the cluster (if the main building goes to Stage 1, the extensions do also, and vice versa).

In order to ensure consistent follow-up, the Accord Lead Brand for the original listing will be assigned as Lead Brand to all its extensions.

If any signatory company objects to the addition of certain extensions to their factory lists, the Accord's Head of Signatory Engagement determine necessary follow-up to assess the signatory's objection.