

# BLOUSES AND BRUISES

HOW SWEDISH FASHION BRANDS ARE OVERLOOKING GENDER-BASED VIOLENCE AT GARMENT FACTORIES.



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business

Fair Action 2023  
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Fair Action is a non-profit organisation pushing Swedish companies to take responsibility for their impact on people and the environment. We examine how consumer goods and services are produced and pressure companies to improve working conditions and pay living wages. The goal of the organisation is a sustainable world where human rights are respected. We are a member of the global network Clean Clothes Campaign.

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# LIST OF ABBREVIATIONS

|             |  |
|-------------|--|
| Amfori BSCI | The Amfori Business Social Compliance Initiative                               |
| CEDAW       | The Convention on the Elimination of all Forms of Discrimination Against Women |
| EU          | European Union   |
| GBVH        | Gender-based violence and harassment   |
| ILO         | International Labour Organization  |
| NGO         | Non-governmental organisation  |
| OECD        | The Organisation for Economic Co-operation and Development                     |
| SDGs        | Sustainable development goals  |
| SAI         | Social accountability international  |
| UN          | United Nations   |
| UNGPs       | United Nations Guiding Principles on Business and Human Rights                 |

# TABLE OF CONTENT

|                                  |    |
|----------------------------------|----|
| SUMMARY                          | 4  |
| GBVH IN THE TEXTILE SECTOR       | 6  |
| GBVH AT FACTORIES IN INDIA       | 10 |
| BUSINESS RESPONSIBILITY AND GBVH | 12 |
| FINDINGS AND CONCLUSIONS         | 19 |
| METHODOLOGY                      | 23 |
| ANNEX 1 - BRAND COMMENTS         | 24 |
| REFERENCES                       | 30 |

# SUMMARY

Gender-based violence and harassment is a widespread – and well-known - problem in the garment industry, yet numerous accounts of sexual abuse faced by women on the factory floors globally have been largely ignored by many fashion brands.

In this report, Fair Action investigates how the fashion brands **Cellbes, Gina Tricot, Indiska, Kappahl, Nelly,** and **Åhléns** deal with the risk of gender-based violence and harassment in their supplier factories.

For millions of women employed in the global textile industry, going to work is closely linked with the fear of exposure to physical and mental stress and long-lasting trauma. In Bangladesh, Sweden's second-largest import country of clothing, eight out of ten seamstresses report having seen or been exposed to violence or sexual harassment at the workplace. A recent study carried out in India concluded that all interviewed women, in 31 factories, had witnessed or experienced male supervisors or managers conducting GBVH in their factories.

According to the UN Guiding Principles on Business and Human Rights, businesses are responsible for identifying and preventing human rights risks in their supply chain. Businesses should also communicate on how these requirements are fulfilled.

The research in this report is based on information publicly communicated in the sustainability reports of the brands and supplemented with written comments from the brands. The findings show that five out of six clothing companies fail to identify gender-based violence and harassment as a human rights risk in their supply chain. Kappahl stands out as the only company that has recognised violence and harassment against women in factories as a risk. Cellbes and Indiska commit to include gender-based violence as a risk in the future.

The brands' written responses to the report show that all the companies primarily depend on internal codes of conduct and social audits to tackle and keep track of gender-based violence and harassment in their supply chains. Nonetheless, several of the brands recognise that this method is inadequate in preventing gender-based violence.

Fair Action calls for the fashion brands to acknowledge that gender-based violence and harassment is a severe risk within the sector and to take adequate steps to prevent its occurrence. Additionally, relevant risk factors must be addressed. Companies must play a role in ensuring that suppliers provide a healthy and safe environment for factory workers, do not oppose union membership or engage in union busting, provide stable employment contracts and living wages, and create safe avenues for reporting abuse without fear.

An essential initial step towards this goal is to enhance sustainability reporting. By disclosing strategies and actions to address human rights risks in their supply chains, companies can be held accountable for their business conduct. Such transparency can help to bring attention to problems that arise on the factory floor, and it can inspire other companies to raise the overall standard of business responsibility in the sector.

# TOP FINDINGS

How do the Swedish fashion brands **Cellbes, Gina Tricot, Indiska, Kappahl, Nelly,** and **Åhléns** address gender-based violence and harassment (GBVH) in their supply chain? Research based on the brands' sustainability reports shows that:

- 1** Five out of six brands **do not identify gender-based violence and harassment as a human rights risk.** Kappahl is the only brand that identifies gender-based violence and harassment as a human rights risk.
- 2** Five out of six brands **do not elaborate on measures to prevent gender-based violence and harassment,** other than through social audits. Kappahl is the only brand that elaborates on additional measures to prevent gender-based violence and harassment – but only to a certain extent.
- 3** **None of the brands show clearly how the voices of labour unions are reflected** in their human rights due diligence process. Kappahl's written comment in response to the findings in this report, however, states that it includes labour unions in the stakeholder group and will clarify this in future sustainability reports.

# BRAND PLEDGES

The following pledges have been made by brands in response to the findings in this scoping.

- 1** Cellbes and Indiska will include gender-based violence and harassment as a human rights risk in their future risk analyses.
- 2** Indiska will include labour unions as stakeholders in its future materiality analysis.
- 3** Åhléns will increase its efforts on risk mitigation connected to human rights risks.

“WATCH YOUR HANDS”

# GBVH IN THE TEXTILE SECTOR

Women working in the textile industry report being thrown at with bundles of cloth, slapped in their faces when making minor mistakes or not reaching production targets, screamed at and touched on their cheeks, breasts and buttocks.<sup>1,2</sup> They report supervisors demanding sexual favours in exchange for job benefits such as promotions or prolonged short-term contracts, and being punished for refusing.<sup>3</sup>

**In Cambodia, nearly one in three women garment workers report experiencing sexual harassment at work over the last 12 months.**

Source: CARE International

Gender-based violence is regarded by the United Nations (UN) as one of the most significant violations of women’s rights and is often described as one of the most prevalent human rights violations in the world.<sup>4</sup> For millions of women employed in the global textile industry, going to work is closely linked with the fear of exposure to physical and mental stress and long-lasting trauma.<sup>5</sup> Although gender-based violence does not only refer to violence against women, women are disproportionately affected. Socially constructed power imbalances between men and women, as well as gender, cultural, and social norms, have been recognised by the International Labour Organization (ILO) as some of the underlying structural factors that drive the phenomenon.<sup>6</sup>

The garment industry is a notorious example of an industry with power imbalances and is a high-risk sector for GBVH. Globally, it is estimated that 80 per cent of garment sector workers are women. In total, 35 million women work in Asia and the Pacific’s garment, textile and footwear industries.<sup>7</sup> Many of them have little decision-making authority, work on short-term contracts, are migrant workers who lack a social support network and are often answerable to predominantly male supervisors.<sup>8</sup> For instance, in Bangladesh, even though women account for 80 per cent of the workforce, only five per cent of factory supervisors are women.<sup>9</sup> According to a recent study, eight out of ten women in the Bangladesh garment industry have experienced GBVH at work.<sup>10</sup>



**I was working at my desk one day when suddenly somebody grabbed me from my back. It was a leader [at the factory]. I froze for a few seconds, not being able to react. After realizing what was happening, I got angry, slapped him and said, ‘Sir, watch your hands, and you’ve done this to other workers, too!’**

Yuliana, 25, footwear factory worker

Source: Solidarity Centre, 2019

During, and following the Covid-19 pandemic, the situation worsened for many women and other vulnerable groups. According to an interview study conducted in five major garment-producing countries in South and Southeast Asia by the Business and Human Rights Resource Centre, three in ten surveyed respondents reported on an increase in GBVH during the pandemic.<sup>11</sup> Risk factors leading to gender-based violence and harassment at factories intensified and brought the situation to a head: wages were cut, desperation for work increased, and once the factories opened after lockdown, the production pressure became even higher than prior to the pandemic.<sup>12</sup> To make the situation worse, the conditions at work created a ripple effect at home. The increased number of hours spent at the factory as an effect of the increased production pressure meant less time for household responsibilities and heightened the abuse from spouses.<sup>13</sup> Not being able to afford rent for housing, many women were also left vulnerable to harassment by landlords.

Although GBVH must be addressed as a human rights risk, it is also financially beneficial to businesses to address it. A study in Cambodia found that sexual harassment at the workplace costs the garment sector an estimated USD 89 million a year due to staff turnover, absenteeism, and work inefficiency. The highest cost was incurred due to an estimated 13,5 per cent of workers stating that sexual harassment meant they worked nearly fifty per cent less effectively.<sup>14</sup>

#### **CEDAW DEFINITION OF GBVH**

The UN Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) was adopted by the United Nations in 1979. The CEDAW recommendations 19 and 35 define gender-based violence as...

*"...violence which is directed against a woman because she is a woman or that affects women disproportionately, and, as such, is a violation of their human rights."*

Source: [OHCHR](#), [OHCHR CEDAW](#)

#### **ILO CONVENTION NO. 190 DEFINITION OF GBVH**

The ILO 190 defines gender-based violence and harassment as...

*"...violence and harassment directed at persons because of their sex or gender, or affecting persons of a particular sex or gender disproportionately, and includes sexual harassment."*

And "violence and harassment" as...

*"...a range of unacceptable behaviours and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment."*

Source: [ILO](#), Article 1, paragraph 1



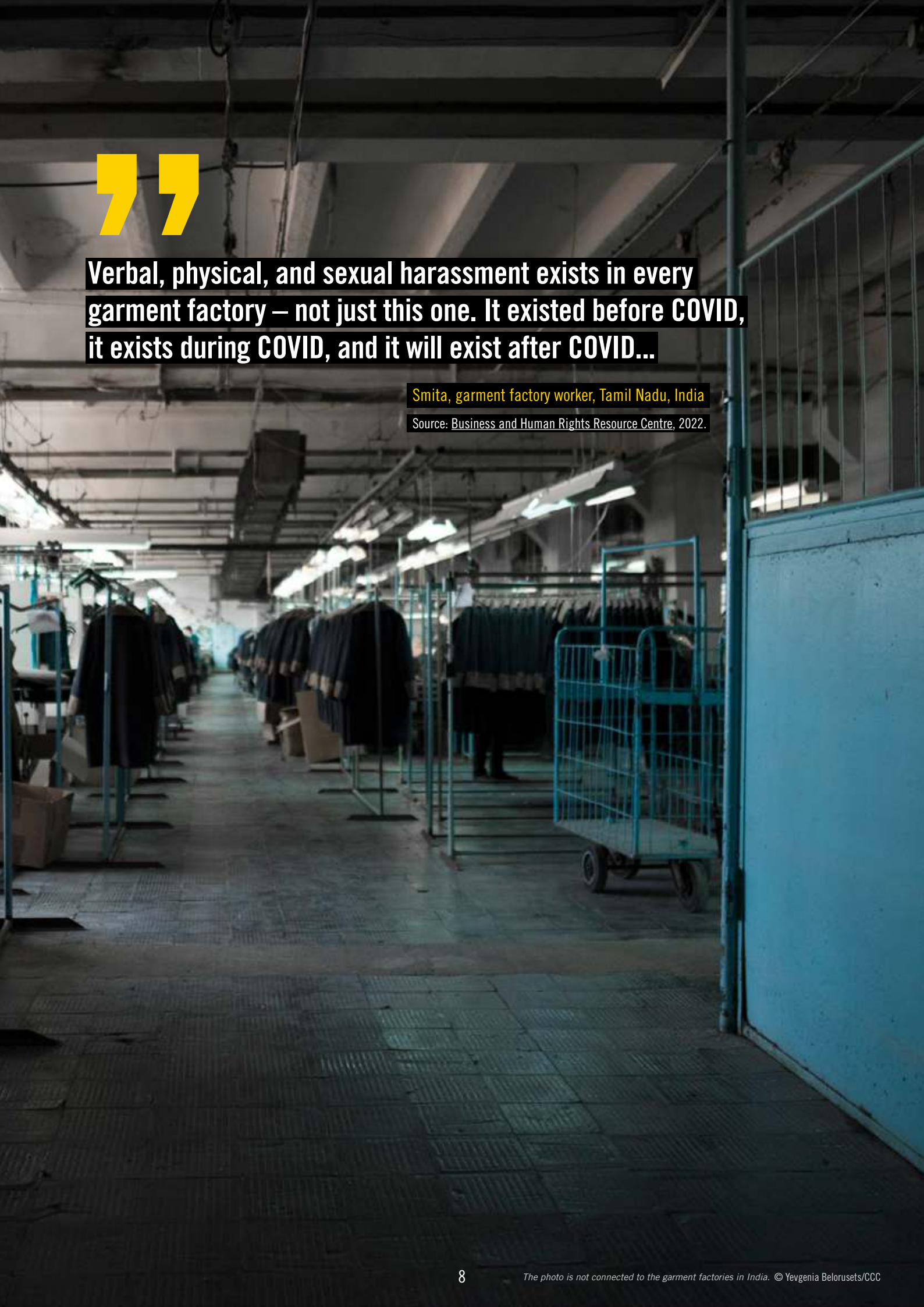


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**Verbal, physical, and sexual harassment exists in every garment factory – not just this one. It existed before COVID, it exists during COVID, and it will exist after COVID...**

Smita, garment factory worker, Tamil Nadu, India

Source: Business and Human Rights Resource Centre, 2022.

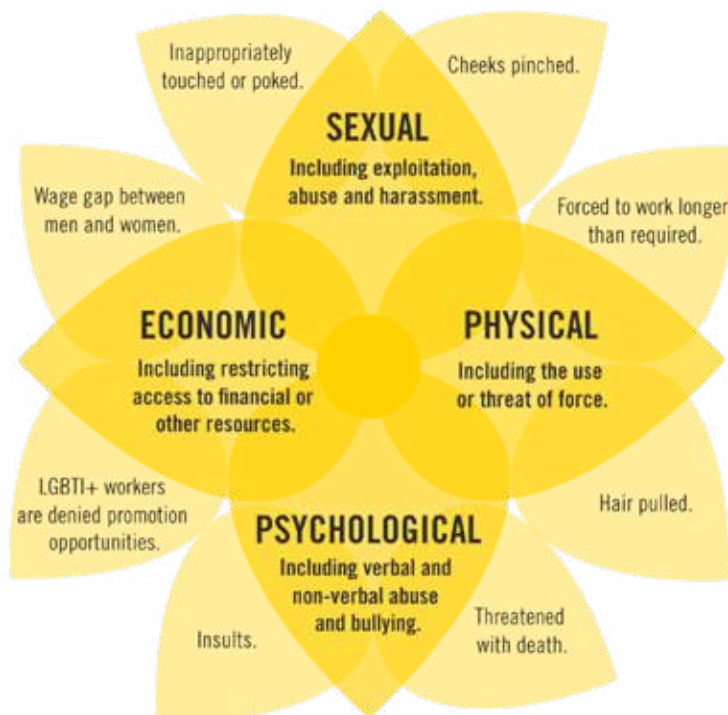


## WHAT IS GENDER-BASED VIOLENCE AND HARASSMENT?

Gender-based violence and harassment can be described as an umbrella term that covers a range of behaviours, including sexual, physical, psychological, and economic abuse, directed at, or disproportionately affecting people because of their sex or gender. The abuse can, but need not, have sexual connotations (See figure below).<sup>15</sup>

From the perspective of many women garment workers, sexual harassment must be understood as part of a broader system of discrimination, which includes everything from wage discrimination, to undergoing mandatory ultrasound scans, to contract-termination due to pregnancy, to being afraid on the bus going home from work, to being abused at home for not having enough time for household duties.<sup>16</sup> This inclusive view on gender-discrimination is supported by the ILO 190 which acknowledges all violence and harassment occurring “in the course of, linked with, or arising out of work,” as part of the world of work.<sup>17</sup>

### Examples of gender-based violence and harassment



Sources: [Bangladesh Center for workers Solidarity and FEMNET](#), [Solidarity Centre](#), [Social Development Direct](#).

“THE VERBAL HARASSMENT IS UNBEARABLE”

# GBVH AT FACTORIES IN INDIA

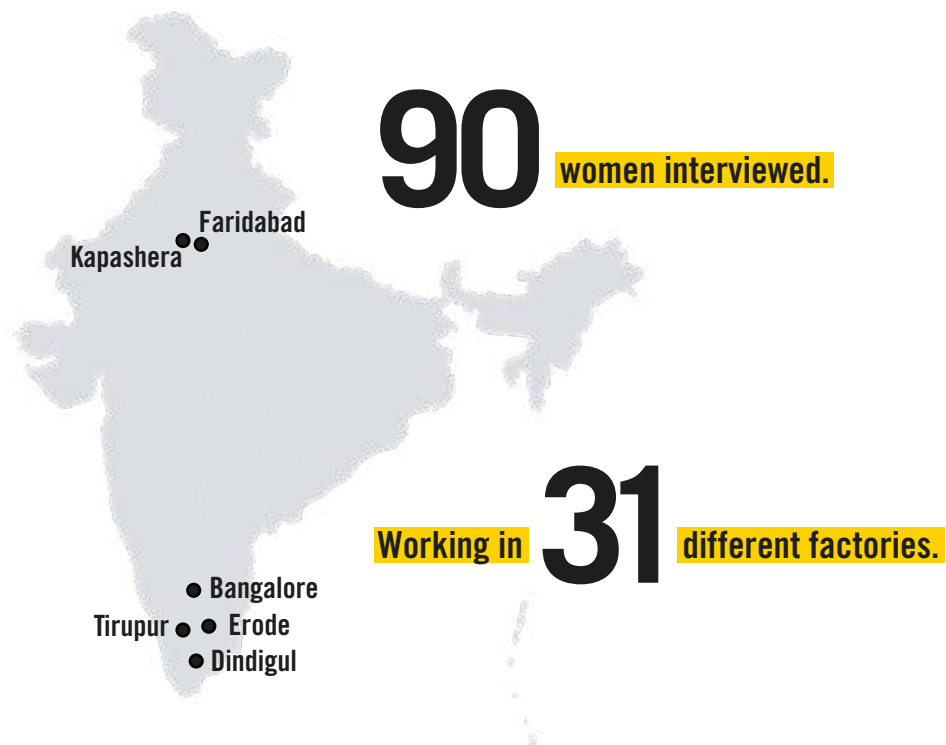
India is the world’s third-largest exporter of garments after China and the EU.<sup>18</sup> In 2021, garments from India to a value of SEK 968 million (USD 93 million) were imported into Sweden,<sup>19</sup> and all investigated fashion brands in this report sourced garments from India in 2021.<sup>20</sup>

Garment factories in India employ approximately 13 million people and millions more obtain their livelihood in the sector in informal settings.<sup>21</sup> Women comprise 39 per cent of the garment workers in the country.<sup>22</sup> Although GBVH is illegal in the workplace in India,<sup>23</sup> and although audit firms like Amfori BSCI claim to address the issue through their audit schemes, the interview study "Unbearable harassment", conducted in 2022, concluded that **every single woman had witnessed or experienced male supervisors or managers conducting GBVH in their factories.**<sup>24</sup>

The interviews were conducted in the garment-producing hubs Faridabad and Kapashera on the outskirts of Delhi; Bangalore in Karnataka; and Dindigul, Erode and Tirupur in Tamil Nadu (see figure below).<sup>25</sup> All brands under scrutiny in this report that are transparent with their supplier lists (Nelly, Gina Tricot, Kappahl, Cellbes and Åhlens), have suppliers either in, or in the vicinity of, these areas.<sup>26</sup>

## Garment-producing hubs included in the report Unbearable harassment

Source: Business and Human Rights Resource Centre, Society for Labour and Development (2022)





“  
**Once an incident takes place, I keep thinking about it the whole day. Sometimes I break down. Sometimes I am so upset I can't eat lunch. This impacts my work and can bring more abuse from the supervisor.**

Anu, garment worker, Faridabad, India

Source: Business and Human Rights Resource Centre, 2022

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The same study revealed a wide-spread culture where sexual jokes, catcalling, touching of cheeks, buttocks and breasts, and sexual advances from supervisors and managers are common features of a regular working day at the factory, especially for younger women and trainees. Women also shared testimonies of managers who would offer to reduce production targets and increase pay in return for sexual favours. Managers would threaten them with mandatory overtime and denial of bathroom and lunch breaks if they refused. The majority of the women experienced long-lasting distress from their experiences.<sup>27</sup>

”

**The verbal harassment is unbearable. The supervisors are constantly yelling at us – this was the case before the pandemic and now. They treat male and female workers differently. The male workers are friends with the supervisors, who are all men. For a small mistake, the supervisor will yell at a woman worker... If a male worker fails to meet production targets for more than a week, he will only get a warning.**

Sheeba, Karnataka, India

Source: Business and Human Rights Resource Centre, 2022

# BUSINESS RESPONSIBILITY AND GBVH

Responsibilities of fashion companies are formalised in several international agreements and standards. One of the most prominent is the United Nations Guiding Principles for Business and Human Rights (UNGPs), currently being developed into EU legislation through the proposal for a Corporate Sustainability Due Diligence Directive. Other central frameworks include the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector, the ILO Convention on Violence and Harassment (no.190), and the Sustainable Development goals, outlined in the following section.

## THE UN GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS

The UN Guiding Principles on Business and Human Rights, endorsed by the UN Human Rights Council in 2011, have become the authoritative global standard on business and human rights. According to the principles, enterprises have the responsibility to respect human rights in their business practices and throughout their supply chain, including the right to be free from GBVH. This responsibility means they should conduct a human rights due diligence to know and address their human rights risk. Due diligence is the process through which enterprises **identify, prevent, mitigate** and **account** for how they address their actual and potential adverse impacts on human rights. Its effectiveness is measured by the extent to which potential harm is prevented and mitigated.<sup>28</sup> Businesses are also expected to **show** how impacts are addressed. Showing involves communication: companies must provide a measure of transparency and accountability towards groups who may be impacted and other relevant stakeholders. Where there are severe risks of human rights impacts, formal reporting is expected, and the reporting should “cover topics and indicators concerning how enterprises identify and address adverse impacts on human rights.”<sup>29</sup>

## THE OECD DUE DILIGENCE GUIDANCE FOR RESPONSIBLE SUPPLY CHAINS IN THE GARMENT AND FOOTWEAR SECTOR

The OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector supports enterprises in implementing the due diligence recommendations contained in the OECD Guidelines for Multinational Enterprises along the garment and footwear supply chain. The guidance is aligned with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and other relevant ILO Conventions and Recommendations. The guidance describes GBVH as a prevalent risk in the garment sector and has a module dedicated to GBVH in the workplace which provides enterprises with information on how to tailor their due diligence approach when addressing GBVH.<sup>30</sup>

## THE ILO CONVENTION ON VIOLENCE AND HARASSMENT (NO. 190)

In 2019, the ILO Convention 190 broke ground as the first binding global treaty to address violence and harassment in the workplace, including gender-based violence and harassment. The treaty recognises the need to address the root causes of gender-based violence and requires employers in ratifying countries to identify hazards and assess the risks of violence and harassment and take measures to prevent and control them. All measures must be adopted and implemented in consultation with workers and their representatives.<sup>31</sup>

## THE SUSTAINABLE DEVELOPMENT GOALS

The Sustainable Development Goals, or Global Goals, are agreed upon by all world leaders to build a greener, fairer, and better world by 2030. The Global Goals resources for businesses underline the importance of businesses taking action by stating that: “The Global Goals simply cannot be achieved without businesses. Through their core operations, financial commitments, employee networks, consumer-facing platforms and high-level influence, companies have a crucial role to play in accelerating progress towards the Goals.”<sup>32</sup>

### Three of the Global Goals are of specific relevance to GBVH:



The infographic features three colored boxes at the top, each representing a Sustainable Development Goal. The first box is red and contains the number '5', the text 'GENDER EQUALITY', and a white icon of a female symbol with an equals sign inside. The second box is purple and contains the number '8', the text 'DECENT WORK AND ECONOMIC GROWTH', and a white icon of a bar chart with an upward-pointing arrow. The third box is pink and contains the number '10', the text 'REDUCED INEQUALITIES', and a white icon of a scale of justice. Below these boxes, the text for each goal is provided in a white font on a dark background.

**5: Achieve gender equality and empower all women and girls.**  
This goal includes targets to *end discrimination against women and girls and end all violence against and exploitation of women and girls.*

**8: Inclusive and sustainable economic growth, full and productive employment and decent work for all.** This goal includes targets to *achieve decent work with equal pay and to protect labour rights and promote safe working environments.*

**10: Reduce inequality within and among countries.**  
This goal includes targets to *reduce income inequalities and ensure equal opportunities and end discrimination.*

“VOLUNTARY INDUSTRY INITIATIVES HAVE FAILED”

# ADDRESSING GBVH IN THE GARMENT FACTORIES

## LIMITATIONS OF SOCIAL AUDITS

Many brands heavily rely on social audits to monitor the conditions in the factories that produce their garments.<sup>33</sup> There are many such audit schemes. Some of the largest include Amfori BSCI, Sedex, and Social Accountability International (SAI) and its SA8000 standard.<sup>34</sup> The failure of the system of social audits to bring adequate improvement of working conditions is, however, well-documented and a well-known fact within the fashion industry.<sup>35</sup> Indeed, several brands researched in this report acknowledge the challenges of relying on social audits in their comments to this report. For instance, Cellbes writes: “We understand the point that audits aren’t the most effective way to prevent GBVH and will take that into account when improving our work” (see Annex 1).

There are several cases that have ended in tragic outcomes due to the structural limitations of the social audit systems. One of the most well-known examples is the Rana Plaza factory collapse in 2013 in Bangladesh. Even though it had undergone audit inspections, it collapsed and left 1,134 workers dead in the rubble.<sup>36</sup> Another telling example is the conclusion made by academic Mark Anner after researching 800 audits. At the factories, he found that the independent labour rights-monitoring organisation, the Workers Rights Consortium, was six times more likely to find violations of freedom of association than the well-established audit firm to which he compared it.<sup>37</sup>



**Evidence shows voluntary industry initiatives have consistently failed to protect women garment workers in their supply chains from GBVH.**

Ashmita Sharma, Society for Labour and Development, India

Source: Fair Action, Interview in 2022

The failure of audit systems to identify and address problems at factories is due to many reasons: conflicts of interest as auditors are often paid by the very companies they are auditing,<sup>38</sup> low levels of transparency of audit reports that make it difficult for workers, and other stakeholders, to hold companies accountable,<sup>39</sup> inherent incentives for factory managers to bribe inspectors or instruct workers on what to say to auditors,<sup>40</sup> and the production of fake records of wage levels and working hours to make them appear compliant with labour standards.<sup>41</sup>

Taboos and social stigmas make the occurrence of GBVH even harder to detect through audits than physical features such as the lack of fire escapes; interviews with workers are predominantly conducted on-site, in environments where potential victims rarely feel safe enough to share their experiences and where they don’t feel they can rely on full confidentiality.<sup>42</sup> As several women workers point out: the management knows, or can easily find out, precisely who is being interviewed, and where.<sup>43</sup> In a review by Human Rights Watch of 50 audit reports, most of which had been conducted in Bangladesh, India, and Pakistan, and by six well-established firms, the issue of GBVH was hardly even discussed despite the known prevalence of such abuse.<sup>44</sup>

## RECOGNISING GBVH AS A HUMAN RIGHTS RISK

This report argues that audit schemes alone cannot sufficiently address GBVH and fulfill businesses' responsibility to conduct human rights due diligence, as required by the UN Guiding Principles. The OECD Due Diligence Guidance clearly identifies gender-based violence as a sector risk in the garment industry and must consequently be acknowledged as such in fashion brands' due diligence processes. Key to a successful due diligence process that cannot be emphasized enough, is meaningful **stakeholder engagement**. Workers at risk in the supply chain, and their representatives, need to be given an opportunity to provide input prior to major decisions being made that affect them. This is also acknowledged by the OECD Due Diligence Guidance.<sup>45</sup> Ensuring women's participation in this dialogue is critical.<sup>46</sup> The risks of sexual harassment and violence are the highest if women and men do not have the opportunity to collectively organize to address violence.<sup>47</sup> Given the low level of freedom of association in many garment producing countries,<sup>48</sup> and given that women are often underrepresented in decision-making positions in trade unions in garment producing countries,<sup>49</sup> brands need to actively involve women workers in this dialogue. Brands also need to play an active role in encouraging the **right to freedom of association** to ensure that workers can - without fear for repression - speak their voices, bargain collectively, and take part in meaningful dialogues with management to improve working conditions at factory level.

**“By incorporating the definitions of GBVH and applying them to the world of work, brands recognize violence and harassment in the workplace as a basic human rights violation and acknowledge that GBVH disproportionately affects women and girls.”**

-Ashimta Sharma, Society for Labour and Development, India <sup>50</sup>



”

**Building the factory union has really helped reduce harassment for women workers... Supervisors in the finishing department still yell at workers a lot – but they don't yell at union members. They are scared to yell at us. Physical and sexual violence has also reduced.**

**Shivika, garment factory worker, Karnataka, India**

Source: Business and Human Rights Resource Centre, 2022



## UNDERSTANDING THE DRIVERS OF GBVH

As part of the due diligence process, brands need to increase their understanding of risk factors that uphold power imbalances and thus function as catalysts of gender-based violence and harassment and incorporate them into the due diligence process. A number of risk factors of GBVH have been identified by unions, workers' rights organisations and international organisations such as the ILO and OECD.<sup>51</sup> One of the most commonly emphasised risk factors is the role that brands' **purchasing practices** plays on the high production pressure at garment factories.<sup>52</sup> Other risk factors include, for instance, **lack of strong, democratic, labour unions in the garment sector, low wages, and limited upward mobility.**<sup>53</sup>

**“The managers are saying that they have to ship the clothes urgently or they will lose the orders. They say they are under tremendous stress themselves. We face a lot of verbal harassment as they pressure us to produce faster.”**

- Shantha, former factory worker in Karnataka, India <sup>54</sup>

### Purchasing practices

The way in which brands bargain with suppliers, formulate agreements, and stipulate lead times has a strong correlation to the prevalence of GBVH on the factory floor.<sup>55</sup> The fierce competition among supplier factories implies that it is the buying brands that hold the bargaining power and set the conditions for production. Prices for delivery are routinely being squeezed, lead times are becoming increasingly shorter, and last-minute changes and unfair penalties are commonplace.<sup>56</sup> This implies that suppliers are left with less margins to pay wages or to secure severance and few means to cover costs linked to implementing the codes of conduct of brands. It also provides an incentive for suppliers to employ workers on short-term contracts to maintain a flexible workforce that can adjust to the unstable and volatile orders.

Suffering the consequences of the unjust cost sharing between buying brands and suppliers are the workers at the very bottom at the hierarchy - overwhelmingly young women, including a large proportion of migrant women workers from socially marginalised communities. Short-term contracts make it easier to dismiss and control workers, who might not dare to stand up against abuse when risking not getting a prolonged contract.<sup>57</sup> Time-pressured line managers and supervisors pass down the pressure to the seamstresses and become more abusive in their unsuccessful attempts to increase productivity.<sup>58</sup>

**“Verbal harassment is a feature of this job – as production targets increase, the harassment increases. Every day is stressful – supervisors call you ‘bitch,’ ‘moron,’ ‘idiot’ if you do not make your targets. We should learn to ignore it, but sometimes we are not able to and start to cry. Harassment is less in units that produce for domestic markets, but the pay is also lower.”**

- Indira and Priyanka, former garment factory workers in Tamil Nadu, India <sup>59</sup>

### Labour unions, wages and management

Lack of strong and democratic labour unions imply that workers themselves cannot take part in addressing sexual harassment and violence at the factories, raise concerns, achieve remedy, and participate in finding sustainable solutions. At the same time, the hostility towards unions is often intense in the garment sector. Union leaders and workers who are union affiliated are often singled out and punished.<sup>60,61</sup> The low wages dominating the garment sector make workers vulnerable to sexual favours in exchange for employment opportunities. Similarly, workers are more vulnerable where supervisors are predominantly men, as supervisors have leverage to demand sexual favours in exchange for approving targets, or for excusing lateness.<sup>62</sup> Women workers interviewed by the Business and Human Rights Resource Centre described receiving better treatment in factories where women are employed in higher managerial positions.

**“Working conditions are not bad here. Supervisors and managers don't threaten or scold us because there are two women employed in the HR department and they will come and reprimand any supervisor who is seen yelling at a worker.”**

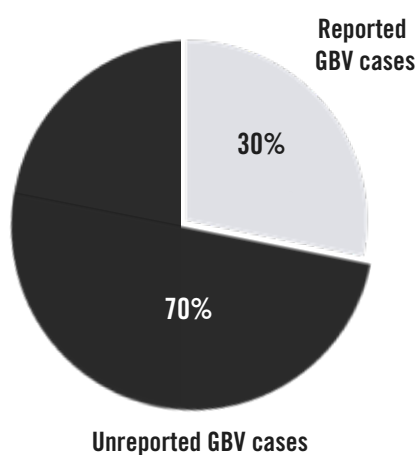
- Vipitha, garment factory worker, Karnataka, India.<sup>63</sup>

## SAFE GRIEVANCE MECHANISMS

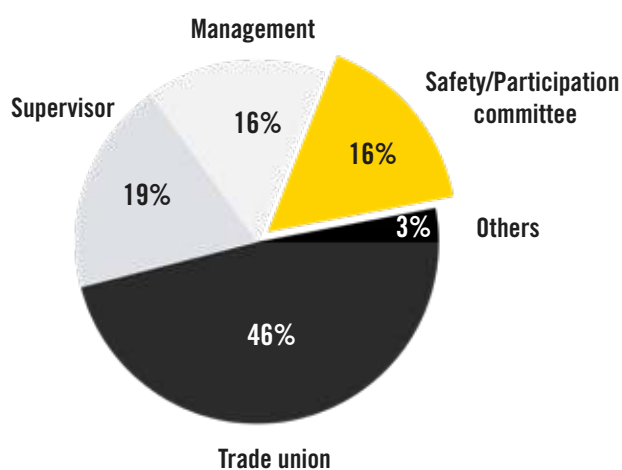
Although GBVH is widespread in the garment industry, garment workers rarely report on abuses (see figure below).<sup>64</sup> Many women testify that harassment rather intensifies than stops when speaking up.<sup>65</sup> Social stigma, shame, fear of reprisals from managers, fear of losing their livelihood, and fear of retaliation at home are factors acting as a disincentive to speak up about their experiences.<sup>66</sup>

### Number of unreported cases of gender-based violence and harassment

Unreported cases of GBVH



To whom workers report GBVH cases



Source: FEMNET 2020

Ensuring **safe grievance** mechanisms is key to enabling an environment where women dare to report on abuses and is often raised by workers as a core need to address violence and harassment in the workplace. In order to ensure the safety of victims reporting on traumatic experiences, and thus to be used, a grievance mechanism needs to be designed in collaboration with workers as they are in the best position to help design effective solutions. Confidentiality for victims of GBVH is another core element of ensuring safety of workers raising concerns.<sup>67</sup> To fulfil its purpose, a grievance mechanism must also be accompanied by adequate training and awareness raising. In a study based on interviews with female factory workers in Indonesia, around half of the interviewees had never heard of the expression “gender-based violence.”<sup>68</sup> It must be clear to workers, both men and women, what constitutes GBVH, how to report it, the process that follows, what support services are available, and how to access remedy.<sup>69</sup>

**“I am so very scared to open up about any [harassment in the factory] as I am worried about the rumours that will circulate [in the community] if people come to know about it.”**

- Indira and Priyanka, former garment factory workers, Tamil Nadu, India <sup>70</sup>

## THE POWER OF ENFORCEABLE AGREEMENTS

It stands clear that voluntary standards on human rights and businesses long have failed to protect women garment workers in their supply chains from violence and harassment. Findings and recommendations from studies and reports show that brands’ own business models and purchasing practices rather have fueled this abuse, and that legally binding rules are needed to ensure fashion brands take action to prevent GBVH and other human rights abuses in their supply chains.<sup>71</sup>

The Dindigul Agreement to eliminate GBVH, provides one of the first examples of such an enforceable brand agreement. It was signed between H&M and one of its suppliers in 2021 to tackle gender-based violence at garment factories in India. The agreement followed in the wake of the murder case of Jeyasre Kathiravel, a 20-year-old Dalit woman working at the Natchi Apparel garment factory in Tamil Nadu. The agreement includes training for workers and staff on GBVH and an independent grievance mechanism and is predicted to reach 5,000 workers. The agreement requires mandatory action from H&M if their supplier fails to comply with the commitments and is enforceable through arbitration in Sweden, the home jurisdiction of H&M.<sup>72,73,74</sup>

**“This is the first agreement of its kind in India and has the power to save women’s lives.”**

- Thivya Rakini, president of the Tamil Nadu Textile and Common Labour Union (TTCU) after H&M signed an enforceable brand agreement (EBA) to tackle gender-based violence at garment factories in India.<sup>75</sup>

The agreement to combat gender-based violence in Lesotho’s Garment Industry is another positive example of an agreement that hold brands legally accountable for safety in the garment and textile industry.<sup>76</sup>



**Brands must be held **legally accountable** for the treatment of the women workers who make their clothes and profits. This is possible through enforceable supply chain **agreements** between brands, suppliers, and trade unions that commit to addressing **GBVH in their supply chains.****

**Ashimta Sharma, Society for Labour and Development, India**

**Source: Fair Action, Interview in 2022**

# FINDINGS AND CONCLUSIONS

Gender-based violence and harassment is a widespread – and well-known – problem in the garment industry, yet numerous accounts of sexual abuse faced by women on the factory floors globally have been largely ignored by many fashion brands.

Based on the obligations under the UN Guiding Principles on Business and Human Rights for companies to conduct a human rights due diligence, to involve the voices of workers in the process, and to communicate their results, Fair Action has investigated:

1. whether gender-based violence and harassment in the supply chain is identified as a human rights risk in the risk analyses of six Swedish fashion brands,
2. what measures they have in place to address its occurrence, and
3. whether the brands include unions as stakeholders in their risk analyses.

The brands included in the mapping are **Cellbes, Gina Tricot, Indiska, Kappahl, Nelly, and Åhléns**. Furthermore, Fair Action has also investigated the following two key components of addressing gender-based violence and harassment in the supply chain:

1. to which extent workers have access to safe grievance mechanisms at supplier factories, and
2. whether workers receive training on the issue.

The findings, based on the brands' sustainability reports, are presented in the table below.

|  |   |
|--|---|
| <b>Is gender-based violence and harassment identified as a human rights risk in the supply chain?</b>  |   |
| <b>YES</b> Kappahl   | <b>NO</b> Cellbes, Gina Tricot, Indiska, Nelly and Åhléns.          |
| <b>Does the company describe how they work to prevent gender-based violence and harassment in the supply chain, in other ways than through audits?</b> |   |
| <b>YES</b> Kappahl   | <b>NO</b> Cellbes, Gina Tricot, Indiska, Nelly and Åhléns.          |
| <b>Are labour unions listed as stakeholders in the company's materiality analysis?</b>   |   |
| <b>YES</b> None  | <b>NO</b> Cellbes, Gina Tricot, Kappahl, Indiska, Nelly and Åhléns. |
| <b>Does the company assert that factory workers have access to a grievance mechanism?</b>  |   |
| <b>YES</b> None  | <b>NO</b> Cellbes, Gina Tricot, Kappahl, Indiska, Nelly and Åhléns. |
| <b>Does the company assert that factory workers receive training on gender-based violence and harassment?</b>  |   |
| <b>YES</b> None  | <b>NO</b> Cellbes, Gina Tricot, Kappahl, Indiska, Nelly and Åhléns. |
| <b>Does the company mention any other initiatives linked to gender-based violence at supplier factories?</b>   |   |
| <b>YES</b> Indiska*  | <b>NO</b> Cellbes, Gina Tricot, Kappahl, Nelly and Åhléns.          |

\*Quote from Indiskas Sustainability Report 2021:

"We would like to highlight a few efforts made by one of our top suppliers when it comes to gender equality, empowerment and workplace safety for women. The supplier developed a policy and strategy for gender equality, with the aim to create an environment where every individual irrespective of their gender are able to achieve equal opportunities and feel safe in his/her working environment. As a result, the supplier has started to take steps to have equal gender representation in business functions previously mainly dominated by men. Women tailors currently represent 45% of the total workforce, and women supervisors 15%, whereas the new target is 50% and 20% respectively. This model is something we will continue to promote and encourage more suppliers to adopt."

Fair Action can conclude that five out of the six brands do **neither identify gender-based violence and harassment as a human rights risk, nor elaborate on measures to prevent gender-based violence.**

**Kappahl** sticks out as the only brand that has taken the initial steps to address the issue of gender-based violence and harassment in its global supply chain: Kappahl acknowledges gender-based violence and harassment as a human rights risk, has implemented measures to combat it – although to a very limited extent - and is transparent about its efforts in its sustainability report. However, although Kappahl is the most progressive brand in the study, the attention given to this issue is still very limited.

None of the brands show clearly if, and how, the voices of labour unions are reflected in their human rights due diligence process. According to the written comments to the findings in this report, Kappahl does, however, state that it does include labour unions in the stakeholder group and will clarify this in future reporting.

None of the sustainability reports assert that factory workers have access to a grievance mechanism, and none reports providing training on gender-based violence and harassment.

Furthermore, the brands' written responses to the findings show that the companies primarily depend on internal codes of conduct and social audits to tackle and keep track of gender-based violence and harassment in their supply chains. Nonetheless, several of them recognise that this method is inadequate in preventing gender-related violence. **Nelly** sticks out as the brand with the highest reliance on social audits and the least insights into their limitations.

While Fair Action can draw the conclusion that gender-based violence and harassment at supplier factories is an issue that has received little attention by the brands in the past, four out of the six brands make commitments to enhance their efforts to combat gender-based violence and harassment in the future. Specifically, **Cellbes** will include gender-based violence and harassment as a human rights risk in its next sustainability report, **Indiska** will revise its risk analysis to ensure that gender-based violence and harassment is specifically targeted and will include labor unions as a stakeholder group, and **Ählens** acknowledges that it needs to give greater attention to human rights risks in the future.

Fair Action calls for the brands included in this study, as well as all fashion brands, to acknowledge that gender-based violence and harassment is a severe risk within the sector with devastating effects on the lives of garment workers globally. Although gender-based violence disproportionately affects women, it does not only refer to violence against women. Brands must take adequate steps in preventing its occurrence and providing a secure environment for all workers in their supply chains.

Additionally, relevant risk factors must be addressed. Companies must play a role in ensuring that suppliers provide a healthy and safe environment for factory workers, do not oppose union membership or engage in union busting, provide stable employment contracts and living wages, and create safe avenues for reporting abuse without fear.

An essential initial step towards this goal is to enhance sustainability reporting. By disclosing strategies and actions to address human rights risks in their supply chains, companies can be held accountable for their business conduct. Such transparency can help to bring attention to problems that arise on the factory floor, and it can inspire other companies to raise the overall standard of business responsibility in the sector.

# RECOMMENDATIONS TO BRANDS

The following recommendations are in line with the UN Guiding Principles on Business and Human Rights, OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector, and the ILO Convention no. 190 “Eliminating Violence and Harassment in the World of Work”. They are coherent with many of the recommendations developed by civil society organizations through interviews with textile workers at risk of gender-based violence.

- 1. Conduct an effective human rights due diligence for GBVH** – identify GBVH as a salient human rights risk, identify preventative measures, and how victims can be remediated. Provide remedy where abuses occur.
- 2. Collaborate with women workers**, local trade unions, NGOs, women-led civil society organisations, and worker organisations in the human rights due diligence process to ensure that the perspective of rights-holders and stakeholders are considered.
- 3. Be transparent and communicate** strategies, goals, and outcomes publicly and in the sustainability report. Use relevant indicators (KPIs) to measure the effectiveness of the activities and report publicly on those. Affected parties and other stakeholders should be able to hold the company accountable and demand improvements. Transparency is also a way of sharing good practice with industry peers.
- 4. Provide financial incentives** (such as extended or larger contracts, price premiums) to suppliers addressing known risk factors of GBVH. When expanding production, give preference to suppliers with higher wages, unionised facilities, and a systematic occupational health and safety program that includes GBVH.
- 5. Identify and address known risk factors of GBVH**, such as low wages, lack of freedom of association, and unfair purchasing practices:
  - a. Set a **living wage strategy** with time-bound and measurable goals.
  - b. **Identify and prevent anti-union policies and practices** in supplier factories and communicate to the suppliers that the company has zero tolerance of all attempts to prevent trade unions from organising.
  - c. **Ensure purchasing prices** that reflect actual labour costs, costs for GBVH preventing measures, and lead times that safeguard working hours and occupational health and safety in accordance with relevant ILO standards and national law (whatever has the highest protection for workers).
- 6. Develop safe, effective, and confidential grievance mechanisms** at factory level that are co-created with women workers and their trade unions.

7. Provide **mandatory training on GBVH** to all workers in the supply chain, as well as to supervisors and factory management, on unacceptable behaviour, on how to prevent GBVH, and on how to report an incident. Provide targeted training, including life skills such as leadership and decision-making, and awareness-raising to vulnerable workers.

8. **Initiate, contribute to, and sign on to legally binding and enforceable agreements** to prevent and remediate GBVH in garment factories.

## FURTHER READING

**Resource kit on Gender-based violence in global supply chains**

(Fair Wear Foundation/ILO)

**Addressing Gender-Based Violence and Harassment Emerging Good Practice for the Private Sector** (Annex 8 includes examples on KPIs relevant for GBVH).

(Social Development Direct)

**Common framework for purchasing practices**

(Fair Wear Foundation)

# METHODOLOGY

The findings in this report build on information collected from the annual sustainability reports of 2021 of six major Swedish fashion brands. The brands were selected on a set of criteria including annual turnover, sourcing countries, and presence on the Nordic consumer market.

At the onset of the research, all brands were contacted individually and given information about the ongoing investigation. They were invited to write a written response to the outcome of the findings related to their specific company (see Annex 1). Through the written comments, the brands were given the opportunity to elaborate on measures to address gender-based violence and harassment that were not mentioned in their sustainability reports. Two working days before the final report was released, the full report was sent to the brands.

The Indian NGO Society for Labour and Development has given its input on the report's recommendations to include a perspective from the rights holders and a local stakeholder.



# ANNEX 1 – BRAND COMMENTS

The following comments were sent to Fair Action by the scrutinized brands after they had been informed of the findings of the research, but before the full report was released.

## CELLBES

For us at CELLBES a safe and decent workplace which respects human rights is an important topic in our supply chain. We welcome research done by Fair Action since it gives both us and the public more information about the general situation. Below comment from us is written before reading the full report from Fair Action.

Three years ago we intensified our work regarding the social responsibility in our supply chain. We realized that to be able to drive this work and improve the situation we need to reduce the number of factories working for CELLBES and create a system where we are able to follow up how much each factory is producing for us. This work has resulted in us reducing the number of factories with more than 60 percent since end 2020. In our sustainability report we have high-lighted the risk of violations of human rights and have mentioned discrimination as one example. In our next report we will add gender-based violence and harassment (GBVH) to clarify the risks.

Since we are a relatively small company we decided to join Amfori BSCI where we can work together with other companies regarding social responsibility and human rights. Though Amfori both we and our factories get training and audits are made regularly at each factory. Beyond checking safety, wages and routines the auditor also makes interviews with both workers and management. We are informed where improvements are needed. For example we know that around 10% of our production units are lacking routines and policies regarding discrimination today. We follow up their improvements closely. We also know that all the factories we are working with have a grievance mechanism but 30% of the them need to improve their follow-up and routines regarding this. We have not specifically mentioned this part in our sustainability report but we will add it for next year. Amfori has improved their work regarding GBVH and has signed WEP, woman empowerment principles (UN women) and they have newly started a program called Women Empowerment Program. Amfori has also strengthened their stakeholder advisory council with gender experts, for example UN Women.

We understand the point that audits aren't the most effective way to prevent GBVH and will take that into account when improving our work. Still we think audits are an effective way to see where improvements need to be done when it comes to many other areas included in social responsibility. For example safety, wages and routines. We also think it's a strength to work together with a big organization.

As mentioned we have focused on consolidating our supplier list and on increasing the number of factories that are members in Amfori BSCI. Two years ago 50% of our production units were members. Today we have all the factories in risk countries on board which we think is a great improvement. We are transparent that we still have many improvements to make. Again – we welcome studies like this to show us and other brands where we need to improve.

## GINA TRICOT

Gina Tricot welcome these types of reviews.

We believe in partnerships and collaborations. Since 2010 we have been an active member of amfori BSCI, to improve workers rights in the supply chain as well as have an impact on governmental level. We recognize amfori BSCIs code of conduct ([https://www.amfori.org/sites/default/files/amfori%20BSCI%20COC%20UK\\_0.pdf](https://www.amfori.org/sites/default/files/amfori%20BSCI%20COC%20UK_0.pdf)), and this is implemented in our entire supply chain.

As per the amfori BSCI Code of Conduct, the section “No Discrimination” states:

*Business partners shall not discriminate, exclude or have a certain preference for persons on the basis of gender, age, religion, race, caste, birth, social background, disability, ethnic and national origin, nationality, membership in unions or any other legitimated organisations, political affiliation or opinions, sexual orientation, family responsibilities, marital status, diseases or any other condition that could give rise to discrimination. In particular, workers shall not be harassed or disciplined on any of the grounds listed above.*

This clearly states that discrimination and harassment due to, for instance, gender, is strictly forbidden. This is continuously controlled and audited by both amfori BSCI auditors, but also by our own colleagues located in the production countries.

We recognize the challenges in only working through audits, and therefore put a lot of effort into building and maintaining long-term relationships with suppliers. We have continuous dialogues with our business partners within all fields of sustainability, especially when it comes to workers' rights and needs.

We also promote and engage our supplier within several awareness raising programs, in order to lift awareness among workers and strengthen their knowledge of their rights despite gender. Just to mention a few, we have engaged suppliers in amfori BSCI, WE connect, We empower Asia and UN Womens Women Empowerment Principles as well as awareness raising gender equality programs and Gender Responsive Procurement, with all of them empowering women in the supply chain.

The amfori Academy continuously provides a broad range of trainings for suppliers for raising awareness in the subject.

Working committees are also in place at the suppliers, making it possible for the workers to lift concerns of any sort. The production units also have a grievance mechanism program, Speak for change, in line with amfori BSCI guidance, available for all workers (<https://amfori-foleon.com/speak-for-change/scgm/>). Gina Tricot also have a direct link to same page at [www.ginatricot.com](http://www.ginatricot.com) to spread the awareness further.

## INDISKA

### Regarding the report on Gender-based Violence and Harassment by Fair Action

We appreciate Fair Action's hard work and dedication to raise attention to the important matter of GBVH in the textile industry.

Having been present in Asia, specifically India, for the last 120 years, we are well aware of the challenges connected to the industry, in which women are especially exposed. Many of the suppliers we work with have been our partners since a long time and with whom we have good relationships. However, we acknowledge that issues can still be present and preventive action is necessary. Fair Action's report highlights the need to intensify our efforts to guarantee safe workplaces for women.

During 2022, we have been working intensively on reviewing our social and environmental responsibility work. An updated strategy will be released later this year.

Prior to the Fair Action report, this is what we already had identified as action points related to GBVH:

- Update our Code of Conduct and our requirements for preventive action for social and human rights impact.
- Enhance our focus on social and human rights in our new sustainability commitment.
- Ensure that all suppliers have credible grievance systems in place.
- Conduct an extensive risk analysis for all our business activities up and downstream.
- We are encouraged by the initiative taken by one of our top suppliers (as highlighted in the report) and plan to take that model and learnings further and make a plan for implementation with other suppliers.
- Raise awareness internally specifically regarding gender equality and gender-based harassment. Our CSR manager in India is attending a special course for business leaders at the Swedish Embassy in New Delhi on this topic and plan to take the learning back to the organisation.

Following the Fair Action report, we will add the following points to our responsibility commitments:

- Review our materiality analysis and add potential stakeholders such as labour unions.
- Continue to develop our risk mapping and identify additional risks, further beyond the salient risks in the garment and footwear sector identified by the OECD. Ensure GBVH is specifically mentioned and targeted.
- Increase transparency and communication of our responsibility efforts beyond our sustainability report.

Being a small brand means that our leverage in relation to the suppliers is limited. Thus, to achieve change we need to identify means to collaborate with industry colleagues sharing the same supplier. Jointly it is easier to act, through for example locally present initiatives aimed at this specific topic.

This report has generated good discussions internally and given us an opportunity for self-reflection on how to improve.

Now it is time for action.

## KAPPAHL

Kappahl is committed to work with transparent, responsible, and sustainable partners and to be a fair partner ourselves. We welcome this review as we believe transparency enables accountability and scrutiny.

All Kappahl suppliers sign the Sustainability Commitment thereby committing to follow the requirements on labor and working conditions, including freedom of association and collective bargaining as well as humane treatment.

In the countries that we produce (Bangladesh, China, Turkey, India, Sri Lanka, Pakistan, Cambodia, EU) gender-based violence and harassment and in most cases grievance mechanisms are covered by law.

Kappahl conducts own factory reviews at all garment suppliers' factories. It is a basic requirement of the Kappahl factory review process of our garment suppliers for the factory workers to have access to a grievance mechanism in the factory. The factory review also surveil compliance with legal frameworks, such as the India 'Sexual Harassment of women at workplace (Prevention, Prohibition and Redressal) Act, 2013' making mandatory to have grievance mechanisms including but not limited to the Internal Complaints Committee.

In addition to legal requirement in Bangladesh, as Kappahl is a member of the Accord, we contribute to the Accord hotline. During Kappahl's factory review process, our own staff conduct interviews with the workers to add a second opinion to the facts given the factory representatives.

Labor unions are included in the stakeholder group NGOs in the materiality analysis for the Sustainability Report. A clarification will be made in the next annual report for 2022.

It is a basic requirement of the Kappahl factory review process of our garment suppliers for the factory workers to receive training on gender-based violence and harassment, which is often also required by law in the countries where we produce, as mentioned before. If Kappahl is informed of any violation of working conditions or any grievance at supplier factories, we ask the supplier to submit a corrective action plan with specific deadlines indicating the root cause of the violation, how this can be resolved, who will be responsible to ensure related compliance and prevent the repetition of the violation. After getting an acceptable corrective action plan from the supplier, Kappahl's involved staff follow-up the supplier on that plan, also at unannounced follow-ups on issue-specific findings.

Kappahl's way of working is to integrate the sustainability requirements in our daily business decisions, in contrast to conducting sustainability projects separately. We strive to continuously improve the conditions for the people whose work is contributing to our business. We believe in collaborating with others in the industry to drive change and are a member of the Sustainable Apparel Coalition (SAC) and Ethical Trading Initiative. The tools developed by the SAC enable us to achieve transparency throughout the whole supply chain.

## NELLY

A fairer fashion industry is an important part of Nelly's sustainability work. We see positively on audits and extended legal requirements which helps address and make progress in the challenges of the fashion industry.

In our sustainability report 2021, Nelly's risk and materiality analysis identifies the risk of breaches of human rights in the supply chain. Two of Nelly's priority materiality issues are Gender equality, diversity and equal treatment and Responsible supply chain.

Before new suppliers are contracted for own brands, a human rights risk assessment is carried out, including information gathering from the supplier, review of previous audit findings and action plans and, if possible, site visits. Based on this risk analysis, an action plan is drawn up at the start of the cooperation. For the supplier to be approved, the action plan must be dealt with within the specified time. If a supplier is not willing to comply with the UN Guiding Principles on Human Rights and is not willing to work on continuous improvement, no cooperation will be initiated.

All suppliers of Nelly's own brands have signed the Amfori BSCI Code of Conduct and committed to comply with the Code's guidelines in their operations as well as to pass it on to their subcontractors when starting a collaboration. The Code is based on internationally recognized conventions, declarations and guidelines and includes prohibitions on child and forced labor, as well as regulating issues such as fair wages and working hours, the right to union bargaining, and health and safety in the workplace. Amfori provides educational support for various human rights topics including GBVH. We maintain an ongoing dialogue with our suppliers where we follow up and discuss these types of important topics.

Risks relating to human rights and social conditions include breaches of the right of freedom of association, the risk of child labor, and of course gender-based violence and harassment. In countries where trade unions are banned, such as China, there must be at least one worker representative in each factory to represent their case. If violations of human rights and failure to provide decent working conditions at a supplier are identified, we immediately take action and may terminate the working relationship. It is of importance that the identity and safety of the reporter is protected if breaches are identified.

Gender-based violence and harassment are serious crimes against human rights and classified as zero tolerance at Nelly. We require producers to monitor this via the purchase agreement and Amfori BSCI's Code of Conduct which all producers' signs. To ensure social compliance, our goal is that all factories making Nelly's own brand products are audited based on BSCI or Sedex, i.e., with third-party inspections within the period for the valid audit cycle.

## ÅHLÉNS

It is of our highest concern to ensure that the human rights of all people taking part in the production of our products are respected. All of our suppliers are required to follow a code of conduct that sets the requirements for working conditions such as wages, workplace safety, freedom of speech, working hours and more. This code of conduct do also include requirements regarding grievance mechanisms and non-tolerance of discrimination of persons of the basis of gender, age, religion, race, caste, birth, social background, disability, ethnic and national origin, nationality, membership in unions or any other legitimated organisations. We expect our suppliers to follow internationally accepted labour standards, including the ILO conventions, and to continually work on improving the working conditions for those involved in the production.

We are aware of the fact that requirements and reality is not always equal, and we need to pay even more attention to risk mitigation and actual acts connected to human rights risks. For the time being, gender-specific concerns for female workers in the supply chain has not been a separate focus of concern. Our code of conduct do not integrate any specific gender equality requirements.

We believe that going forward we need to pay more attention to specific groups, particularly vulnerable to discrimination and social exclusion, and to continually work on improving the working conditions for those involved in the production of our products, included but not limited to women.

# REFERENCES

- 1 Bangladesh Center for workers solidarity and FEMNET, 2020, Break the silence, stop the violence. Gender-based violence in the garment sector of Bangladesh: A study on cases, causes and cures, [https://www.bcwsbd.org/uploads/GBV\\_Stop-Violence\\_Report\\_BCWS-FEMNET-2020.pdf](https://www.bcwsbd.org/uploads/GBV_Stop-Violence_Report_BCWS-FEMNET-2020.pdf), accessed 01122022
- 2 Business and Human Rights Resource Centre, 2022, Unbearable harassment. The fashion industry and widespread abuse of female garment workers in Indian factories, [https://media.business-humanrights.org/media/documents/2022\\_GBvH\\_Briefing\\_final\\_je2K7Ei.pdf](https://media.business-humanrights.org/media/documents/2022_GBvH_Briefing_final_je2K7Ei.pdf), accessed 01122022
- 3 Business and Human Rights Resource Centre, 2022, Unpicked. Fashion and Freedom of Association, [https://media.business-humanrights.org/media/documents/2022\\_Unpicked\\_Fashion\\_and\\_FOA.pdf](https://media.business-humanrights.org/media/documents/2022_Unpicked_Fashion_and_FOA.pdf), accessed 01122022
- 4 Fair Wear Foundation, International Training Centre-International Labour Organization, 2016, Resource kit on Gender-based violence in global supply chains. Part A, pg. 70, [https://gbv.itcilo.org/assets/pdf/ResourceKit\\_PART\\_A.pdf](https://gbv.itcilo.org/assets/pdf/ResourceKit_PART_A.pdf), accessed 21022023 and United Nations Populations Fund, Gender-based Violence, <https://www.unfpa.org/gender-based-violence>, accessed 21022023
- 5 International Labour Organization, 2020, Empowering Women at Work, pg. 29, [https://www.ilo.org/wcmsp5/groups/public/---ed\\_emp/---emp\\_ent/---multi/documents/publication/wcms\\_773233.pdf](https://www.ilo.org/wcmsp5/groups/public/---ed_emp/---emp_ent/---multi/documents/publication/wcms_773233.pdf), accessed 01122022
- 6 Better work, 2019, Sexual harassment at work: insights from the global garment industry, pg 7, 17, [https://www.ilo.org/wcmsp5/groups/public/---ed\\_dialogue/---sector/documents/publication/wcms\\_732095.pdf](https://www.ilo.org/wcmsp5/groups/public/---ed_dialogue/---sector/documents/publication/wcms_732095.pdf), accessed 01122022
- 7 International Labour Organization, 2021, Moving the needle: Gender equality and decent work in Asia's garment sector Regional Road Map, pg. 5, [https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/documents/genericdocument/wcms\\_793065.pdf](https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/documents/genericdocument/wcms_793065.pdf), accessed 13012023
- 8 Clean Clothes Campaign, 2020, Wages and gender-based violence, pg. 3, [https://cleanclothes.org/file-repository/wages\\_and\\_gbv\\_femnet\\_position\\_paper.pdf/view](https://cleanclothes.org/file-repository/wages_and_gbv_femnet_position_paper.pdf/view), accessed 02122022
- 9 International Labour Organization, 2021, Turning up the heat: Exploring potential links between climate change and GBVH in the garment sector, <https://www.ilo.org/legacy/english/intserv/working-papers/wp031/index.html>, accessed 01122022
- 10 ActionAid 2019 Briefing paper on GBVH in Bangladesh, pg. 1, <https://actionaid.org/news/2019/80-garment-workers-bangladesh-have-experienced-or-witnessed-sexual-violence-and>, accessed 01122022
- 11 Business and Human Rights Resource Centre, 2022, Unpicked. Fashion and Freedom of Association, pg. 21, [https://media.business-humanrights.org/media/documents/2022\\_Unpicked\\_Fashion\\_and\\_FOA.pdf](https://media.business-humanrights.org/media/documents/2022_Unpicked_Fashion_and_FOA.pdf), accessed 01122022
- 12 Business and Human Rights Resource Centre, 2022, Unpicked. Fashion and Freedom of Association, pg. 4, [https://media.business-humanrights.org/media/documents/2022\\_Unpicked\\_Fashion\\_and\\_FOA.pdf](https://media.business-humanrights.org/media/documents/2022_Unpicked_Fashion_and_FOA.pdf), accessed 01122022
- 13 Business and Human Rights Resource Centre, 2022, Unbearable harassment. The fashion industry and widespread abuse of female garment workers in Indian factories, pg. 22, [https://media.business-humanrights.org/media/documents/2022\\_GBvH\\_Briefing\\_final\\_je2K7Ei.pdf](https://media.business-humanrights.org/media/documents/2022_GBvH_Briefing_final_je2K7Ei.pdf), accessed 01122022
- 14 Care, 2017, 'I know I cannot quit.' The Prevalence and Productivity Cost of Sexual Harassment to the Cambodian Garment Industry, pg. 4, [https://insights.careinternational.org.uk/media/k2/attachments/SHCS\\_Full\\_Technical\\_Report\\_March\\_2017.pdf](https://insights.careinternational.org.uk/media/k2/attachments/SHCS_Full_Technical_Report_March_2017.pdf), accessed 01122022

- 15 International Labour Organisation, 2019, Violence and Harassment Convention, [https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C190](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C190), accessed 01122022
- 16 Meeting between Fair Action and Business and Human Rights Resources Centre, June 2022.
- 17 International Labour Organisation, Convention No. 190 and Recommendation No. 206 at a glance, [https://www.ilo.org/wcmsp5/groups/public/---dgreports/---gender/documents/briefingnote/wcms\\_738114.pdf](https://www.ilo.org/wcmsp5/groups/public/---dgreports/---gender/documents/briefingnote/wcms_738114.pdf), accessed 11012023
- 18 Statista, 2023, Leading exporting countries of textile worldwide by value in 2021 (in billion U.S. dollars), <https://www.statista.com/statistics/236397/value-of-the-leading-global-textile-exporters-by-country/>, accessed 02092023
- 19 Statistiska Centralbyrån, Statistikdatabasen. <https://www.statistikdatabasen.scb.se/sq/133457>, accessed 09022022
- 20 Cellbes supplier list, [https://www.cellbes.se/pub\\_docs/files/customer\\_service/documents\\_se/Production-Units-Sep-2022.pdf](https://www.cellbes.se/pub_docs/files/customer_service/documents_se/Production-Units-Sep-2022.pdf), accessed 09022023. Gina Tricot supplier list, <https://www.ginatricot.com/cms/work/HALLBAR-HET/leverantor/2022-08/Tier%201.pdf>, accessed 09022023. Kappahl supplier list, <https://www.kappahl.com/sv-SE/om-kappahl/hallbarhet/var-produktion/leverantorer/>, accessed 09022023. Nelly supplier list, <https://content.nelly.com/v1/static/Nelly-Private-label-Public-factory-list>, accessed 09022023. Åhléns supplier list, <https://www.ah lens.se/cms/leverantorslista>, accessed 09022023.
- 21 Business and Human Rights Resource Centre, 2022, Unbearable harassment. The fashion industry and widespread abuse of female garment workers in Indian factories, pg 9.
- 22 International Labour Organization, 2020, Employment, wages and productivity trends in the Asian garment sector. Data and policy insights for the future of work, [https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/documents/publication/wcms\\_848624.pdf](https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/documents/publication/wcms_848624.pdf), pg. 33, accessed 11012023
- 23 Ministry of Women and Child Development, Government of India 2013, Sexual Harassment of Women at Workplace Act, [https://www.indiacode.nic.in/handle/123456789/2104?-sam\\_handle=123456789/1362](https://www.indiacode.nic.in/handle/123456789/2104?-sam_handle=123456789/1362), accessed 02122022
- 24 Business and Human Rights Resource Centre, 2022, Unbearable harassment. The fashion industry and widespread abuse of female garment workers in Indian factories, pg. 3, [https://media.business-humanrights.org/media/documents/2022\\_GBVH\\_Briefing\\_final\\_je2K7Ei.pdf](https://media.business-humanrights.org/media/documents/2022_GBVH_Briefing_final_je2K7Ei.pdf), accessed 01122022
- 25 Business and Human Rights Resource Centre, 2022, Unbearable harassment. The fashion industry and widespread abuse of female garment workers in Indian factories, pg. 3, 9, 21, [https://media.business-humanrights.org/media/documents/2022\\_GBVH\\_Briefing\\_final\\_je2K7Ei.pdf](https://media.business-humanrights.org/media/documents/2022_GBVH_Briefing_final_je2K7Ei.pdf), accessed 01122022
- 26 Cellbes supplier list, [https://www.cellbes.se/pub\\_docs/files/customer\\_service/documents\\_se/Production-Units-Sep-2022.pdf](https://www.cellbes.se/pub_docs/files/customer_service/documents_se/Production-Units-Sep-2022.pdf), accessed 09022023. Gina Tricot supplier list, <https://www.ginatricot.com/cms/work/HALLBAR-HET/leverantor/2022-08/Tier%201.pdf>, accessed 09022023. Kappahl supplier list, <https://www.kappahl.com/sv-SE/om-kappahl/hallbarhet/var-produktion/leverantorer/>, accessed 09022023. Nelly supplier list, <https://content.nelly.com/v1/static/Nelly-Private-label-Public-factory-list>, accessed 09022023. Åhléns supplier list, <https://www.ah lens.se/cms/leverantorslista>, accessed 09022023.
- 27 Business and Human Rights Resource Centre, 2022, Unbearable harassment. The fashion industry and widespread abuse of female garment workers in Indian factories, pg. 3, 9, 21, [https://media.business-humanrights.org/media/documents/2022\\_GBVH\\_Briefing\\_final\\_je2K7Ei.pdf](https://media.business-humanrights.org/media/documents/2022_GBVH_Briefing_final_je2K7Ei.pdf), accessed 01122022
- 28 Organisation for Economic Co-operation and Development, 2018, Due diligence Guidance Garment Guidance for responsible supply chains in the garment and footwear sector, pg. 25-26, <https://www.oecd-ilibrary.org/docserver/9789264290587-en.pdf?expires=1669912616&id=id&accname=guest&checksum=3E97F5966560522D4D76D-48DE376F203>, accessed 01122022
- 29 United Nations, 2012, Guiding Principles on Business and Human Rights, pg. 25, [https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr\\_en.pdf](https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf), accessed 02122022
- 30 Organisation for Economic Co-operation and Development, 2018, Due Diligence Guidance for responsible supply chains in the garment and footwear sector, pg. 116, <https://www.oecd-ilibrary.org/docserver/9789264290587-en.pdf?expires=1669912616&id=id&accname=guest&checksum=3E97F5966560522D4D76D48DE376F203>, accessed 01122022
- 31 International Labour Organisation, 2019, Violence and Harassment Convention, [https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C190](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C190), accessed 01122022



- 32 United Nations, Global Goals, <https://www.globalgoals.org/goals>, accessed 20230202
- 33 Human Rights Watch, 2018, Combatting sexual harassment in the garment industry, <https://www.hrw.org/news/2019/02/12/combating-sexual-harassment-garment-industry>, accessed 02122022
- 34 Clean Clothes Campaign, 2019, Figleaf for fashion, pg. 17, <https://cleanclothes.org/file-repository/figleaf-for-fashion.pdf/view>, accessed 01122022
- 35 Eg. Clean Clothes Campaign, 2019, Figleaf for fashion, <https://cleanclothes.org/file-repository/figleaf-for-fashion.pdf/view>, accessed 1201202; Human Rights Watch, 2022, Obsessed with Audit Tools, Missing the Goal, <https://www.hrw.org/report/2022/11/15/obsessed-audit-tools-missing-goal/why-social-audits-cant-fix-labor-rights-abuses>, accessed 12012023
- 36 Clean Clothes Campaign, 2019, Figleaf for fashion, pg. 6, <https://cleanclothes.org/file-repository/figleaf-for-fashion.pdf/view>
- 37 Clean Clothes Campaign, 2019, Figleaf for fashion, pg. 26, <https://cleanclothes.org/file-repository/figleaf-for-fashion.pdf/view>
- 38 Human Rights Watch, 2022, Obsessed with Audit Tools, Missing the Goal, <https://www.hrw.org/report/2022/11/15/obsessed-audit-tools-missing-goal/why-social-audits-cant-fix-labor-rights-abuses>, accessed 12012023
- 39 Human Rights Watch, 2022, Obsessed with Audit Tools, Missing the Goal, <https://www.hrw.org/report/2022/11/15/obsessed-audit-tools-missing-goal/why-social-audits-cant-fix-labor-rights-abuses>, accessed 12012023
- 40 Clean Clothes Campaign, 2019, Figleaf for fashion, pg. 72, <https://cleanclothes.org/file-repository/figleaf-for-fashion.pdf/view>, accessed 01122022
- 41 Clean Clothes Campaign, 2019, Figleaf for fashion, pg. 72, <https://cleanclothes.org/file-repository/figleaf-for-fashion.pdf/view>, accessed 01122022
- 42 Clean Clothes Campaign, 2019, Figleaf for fashion, <https://cleanclothes.org/file-repository/figleaf-for-fashion.pdf/view>
- 43 Human Rights Watch, 2018, Combatting sexual harassment in the garment industry, <https://www.hrw.org/news/2019/02/12/combating-sexual-harassment-garment-industry>, accessed 02122022
- 44 Human Rights Watch, 2018, Combatting sexual harassment in the garment industry, <https://www.hrw.org/news/2019/02/12/combating-sexual-harassment-garment-industry>, accessed 02122022
- 45 Organisation for Economic Co-operation and Development, 2018, Due Diligence Guidance for responsible supply chains in the garment and footwear sector pg. 27, <https://www.oecd-ilibrary.org/docserver/9789264290587-en.pdf?expires=1669912616&id=id&accname=guest&checksum=3E97F5966560522D4D76D48DE376F203>, accessed 01122022
- 46 Business and Human Rights Resource Centre, 2022, Unpicked. Fashion and Freedom of Association, pg. 26, [https://media.business-humanrights.org/media/documents/2022\\_Unpicked\\_Fashion\\_and\\_FOA.pdf](https://media.business-humanrights.org/media/documents/2022_Unpicked_Fashion_and_FOA.pdf), accessed 01122022
- 47 Fair Wear Foundation, International Training Centre-International Labour Organization, 2016, Resource kit on Gender-based violence in global supply chains. Part A, pg. 56, [https://gbv.itcilo.org/assets/pdf/ResourceKit\\_PART\\_A.pdf](https://gbv.itcilo.org/assets/pdf/ResourceKit_PART_A.pdf), accessed 02122022
- 48 International Trade Union Confederation, 2021, 2021 Global rights index, [https://files.mutualcdn.com/ituc/files/ITUC\\_GlobalRightsIndex\\_2021\\_EN-final.pdf](https://files.mutualcdn.com/ituc/files/ITUC_GlobalRightsIndex_2021_EN-final.pdf), accessed 12012023
- 49 International Trade Union Confederation, 2023, <https://www.ituc-csi.org/count-us-in-600>, accessed 13012023
- 50 Fair Action, 2022, Interview with Ashmita Sharma

- 51 Organisation for Economic Co-operation and Development, 2018, OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector, pg. 118, <https://www.oecd-ilibrary.org/docserver/9789264290587-en.pdf?expires=1669912616&id=id&accname=guest&checksum=3E97F5966560522D4D76D-48DE376F203>, accessed 01122022; Fair Wear Foundation, International Training Centre-ILO, 2016, Resource kit on Gender-based violence in global supply chains. Part A, pg. 52-56, [https://gbv.itcilo.org/assets/pdf/ResourceKit\\_PART\\_A.pdf](https://gbv.itcilo.org/assets/pdf/ResourceKit_PART_A.pdf), accessed 02122022
- 52 International Labour Organization, 2021, Turning up the heat: Exploring potential links between climate change and GBVH in the garment sector, <https://www.ilo.org/legacy/english/intserv/working-papers/wp031/index.html>, accessed 01122022
- 53 Fair Wear Foundation, International Training Centre-ILO, 2016, Resource kit on Gender-based violence in global supply chains. Part A, pg. 52-56, [https://gbv.itcilo.org/assets/pdf/ResourceKit\\_PART\\_A.pdf](https://gbv.itcilo.org/assets/pdf/ResourceKit_PART_A.pdf), accessed 02122022
- 54 Business and Human Rights Resource Centre, 2022, Unbearable harassment. The fashion industry and widespread abuse of female garment workers in Indian factories, pg. 15, [https://media.business-humanrights.org/media/documents/2022\\_GBVH\\_Briefing\\_final\\_je2K7Ei.pdf](https://media.business-humanrights.org/media/documents/2022_GBVH_Briefing_final_je2K7Ei.pdf), accessed 01122022
- 55 International Labour Organization, 2021, Turning up the heat: Exploring potential links between climate change and GBVH in the garment sector, <https://www.ilo.org/legacy/english/intserv/working-papers/wp031/index.html>, accessed 01122022
- 56 Business and Human Rights Resource Centre, 2022, Unbearable harassment. The fashion industry and widespread abuse of female garment workers in Indian factories, pg. 10, [https://media.business-humanrights.org/media/documents/2022\\_GBVH\\_Briefing\\_final\\_je2K7Ei.pdf](https://media.business-humanrights.org/media/documents/2022_GBVH_Briefing_final_je2K7Ei.pdf), accessed 01122022
- 57 Fair Wear Foundation, International Training Centre-ILO, 2016, Resource kit on Gender-based violence in global supply chains. Part A, pg. 35, [https://gbv.itcilo.org/assets/pdf/ResourceKit\\_PART\\_A.pdf](https://gbv.itcilo.org/assets/pdf/ResourceKit_PART_A.pdf), accessed 02122022
- 58 Fair Wear Foundation, International Training Centre-ILO, 2016, Resource kit on Gender-based violence in global supply chains. Part A, pg. 54, [https://gbv.itcilo.org/assets/pdf/ResourceKit\\_PART\\_A.pdf](https://gbv.itcilo.org/assets/pdf/ResourceKit_PART_A.pdf), accessed 02122022, and Social Development Direct, 2020, Addressing gender-based violence and harassment (GBVH) in the manufacturing sector, pg. 2, [https://www.ifc.org/wps/wcm/connect/c8df0656-477f-4b2b-9c67-c91610733670/SectorBrief\\_AddressingGBVH\\_Manufacturing\\_July2020.pdf?MOD=AJPERES&CVID=nddoRfd](https://www.ifc.org/wps/wcm/connect/c8df0656-477f-4b2b-9c67-c91610733670/SectorBrief_AddressingGBVH_Manufacturing_July2020.pdf?MOD=AJPERES&CVID=nddoRfd), accessed 01122022
- 59 Business and Human Rights Resource Centre, 2022, Unbearable harassment. The fashion industry and widespread abuse of female garment workers in Indian factories, pg. 10, [https://media.business-humanrights.org/media/documents/2022\\_GBVH\\_Briefing\\_final\\_je2K7Ei.pdf](https://media.business-humanrights.org/media/documents/2022_GBVH_Briefing_final_je2K7Ei.pdf), accessed 01122022
- 60 Business and Human Rights Resource Centre, 2022, Unpicked. Fashion and Freedom of Association, pg. 23, [https://media.business-humanrights.org/media/documents/2022\\_Unpicked\\_Fashion\\_and\\_FOA.pdf](https://media.business-humanrights.org/media/documents/2022_Unpicked_Fashion_and_FOA.pdf), accessed 01122022
- 61 Business and Human Rights Resource Centre, 2022, Unbearable harassment. The fashion industry and widespread abuse of female garment workers in Indian factories, pg. 16, [https://media.business-humanrights.org/media/documents/2022\\_GBVH\\_Briefing\\_final\\_je2K7Ei.pdf](https://media.business-humanrights.org/media/documents/2022_GBVH_Briefing_final_je2K7Ei.pdf), accessed 01122022
- 62 Bangladesh Center for workers solidarity and FEMNET, 2020, Break the silence, stop the violence. Gender-based violence in the garment sector of Bangladesh: A study on cases, causes and cures, pg. 17, [https://www.bcwsbd.org/uploads/GBV\\_Stop-Violence\\_Report\\_BCWS-FEMNET-2020.pdf](https://www.bcwsbd.org/uploads/GBV_Stop-Violence_Report_BCWS-FEMNET-2020.pdf), accessed 01122022
- 63 Business and Human Rights Resource Centre, 2022, Unbearable harassment. The fashion industry and widespread abuse of female garment workers in Indian factories, pg.21, [https://media.business-humanrights.org/media/documents/2022\\_GBVH\\_Briefing\\_final\\_je2K7Ei.pdf](https://media.business-humanrights.org/media/documents/2022_GBVH_Briefing_final_je2K7Ei.pdf), accessed 12012023
- 64 Solidarity Centre, 2019, In our own words: Women workers address GBV in Indonesian garment factories, pg. 3, <https://www.solidaritycenter.org/wp-content/uploads/2019/06/Gender.Indonesia-report.6.19.pdf>, accessed 01122022
- 65 Bangladesh Center for workers solidarity and FEMNET, 2020, Break the silence, stop the violence. Gender-based violence in the garment sector of Bangladesh: A study on cases, causes and cures, pg. 12-13, [https://www.bcwsbd.org/uploads/GBV\\_Stop-Violence\\_Report\\_BCWS-FEMNET-2020.pdf](https://www.bcwsbd.org/uploads/GBV_Stop-Violence_Report_BCWS-FEMNET-2020.pdf), accessed 01122022
- 66 Business and Human Rights Resource Centre, 2022, Unbearable harassment. The fashion industry and widespread abuse of female garment workers in Indian factories, pg. 12, [https://media.business-humanrights.org/media/documents/2022\\_GBVH\\_Briefing\\_final\\_je2K7Ei.pdf](https://media.business-humanrights.org/media/documents/2022_GBVH_Briefing_final_je2K7Ei.pdf), accessed 01122022

- 67 Social Development Direct (SDD), 2020, Addressing gender-based violence and harassment - Emerging good practice for the private sector, pg. 35, [https://www.ifc.org/wps/wcm/connect/f1645167-7eff-439b-922b-7656c75320ab/GPN\\_AddressingGBVH\\_July2020.pdf?MOD=AJPERES&CVID=nddokiS](https://www.ifc.org/wps/wcm/connect/f1645167-7eff-439b-922b-7656c75320ab/GPN_AddressingGBVH_July2020.pdf?MOD=AJPERES&CVID=nddokiS), accessed 01122022
- 68 Solidarity Centre, 2019, In our own words: Women workers address GBV in Indonesian garment factories, pg. 3, <https://www.solidaritycenter.org/wp-content/uploads/2019/06/Gender.Indonesia-report.6.19.pdf>, accessed 01122022
- 69 Social Development Direct (SDD), 2020, Addressing gender-based violence and harassment - Emerging good practice for the private sector, pg. 54, [https://www.ifc.org/wps/wcm/connect/f1645167-7eff-439b-922b-7656c75320ab/GPN\\_AddressingGBVH\\_July2020.pdf?MOD=AJPERES&CVID=nddokiS](https://www.ifc.org/wps/wcm/connect/f1645167-7eff-439b-922b-7656c75320ab/GPN_AddressingGBVH_July2020.pdf?MOD=AJPERES&CVID=nddokiS), accessed 01122022
- 70 Business and Human Rights Resource Centre, 2022, Unbearable harassment. The fashion industry and widespread abuse of female garment workers in Indian factories, pg. 12, [https://media.business-humanrights.org/media/documents/2022\\_GBVH\\_Briefing\\_final\\_je2K7Ei.pdf](https://media.business-humanrights.org/media/documents/2022_GBVH_Briefing_final_je2K7Ei.pdf), accessed 01122022
- 71 Business and Human Rights Resource Centre, 2022, Unbearable harassment. The fashion industry and widespread abuse of female garment workers in Indian factories, pg. 7, [https://media.business-humanrights.org/media/documents/2022\\_GBVH\\_Briefing\\_final\\_je2K7Ei.pdf](https://media.business-humanrights.org/media/documents/2022_GBVH_Briefing_final_je2K7Ei.pdf), accessed 01122022
- 72 Business and Human Rights Resource Centre, 2022, Unbearable harassment. The fashion industry and widespread abuse of female garment workers in Indian factories, pg. 11, [https://media.business-humanrights.org/media/documents/2022\\_GBVH\\_Briefing\\_final\\_je2K7Ei.pdf](https://media.business-humanrights.org/media/documents/2022_GBVH_Briefing_final_je2K7Ei.pdf), accessed 01122022
- 73 The Guardian, 2022, 'To survive, I must appear fearless': the former nun helping India's garment workers fight sexual violence, <https://www.business-humanrights.org/en/latest-news/india-union-leader-of-tamil-nadus-ony-female-led-garment-workers-union-says-binding-agreement-on-gender-based-violence-harassment-at-natchi-appeals-is-just-the-start/>, accessed 01122022
- 74 Asia Floor Wage, TTCU, Global Labour Justice, 2022, Fact Sheet: The Dindigul Agreement to End Gender-Based Violence and Harassment, <https://asia.floorwage.org/wp-content/uploads/2022/05/Dindigul-Agreement-Fact-Sheet.pdf>, accessed 01122022
- 75 The Guardian, 'To survive, I must appear fearless': the former nun helping India's garment workers fight sexual violence, <https://www.theguardian.com/global-development/2022/may/25/to-survive-i-must-appear-fearless-the-former-nun-helping-indias-garment-workers-fight-sexual-violence>, accessed 12012023
- 76 Worker Rights Consortium, 2019, Landmark Agreements to Combat Gender-based Violence and Harassment in Lesotho's Garment Industry, <https://www.workersrights.org/commentary/landmark-agreements-to-combat-gender-based-violence-and-harassment-in-lesothos-garment-industry/>, accessed 01122022



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