

Survey on fashion brands and retailers' approach to human rights due diligence in Myanmar

Business & Human Rights Resource Centre (BHRRC) is collecting information on fashion brands and retailers' approaches to heightened due diligence in Myanmar as a sourcing country.

This survey provides you with the opportunity to detail your approach to human rights due diligence beyond any responses you have made to BHRRC's Myanmar Allegation [Tracker](#). Your answers will be analysed for our upcoming report on how brands have adapted operational strategies in Myanmar after the military takeover as well as their impacts on garment workers.

Please feel free to provide any supporting information on your practices in any of the questions below (including tick box questions).

The survey will take 15 minutes and will be open for 3 weeks, from the 6th April to the 27th April 2023.

We thank you for your time and cooperation!

Part I: General information

1. Company name: H&M Group
2. Your name: Serkan Tanka
3. Your role: Country Manager Myanmar
4. Your department: Management

Part II: Operation history in Myanmar

5. When did your company start sourcing from Myanmar? 2014
6. Do you still source from Myanmar, as of the 6th April 2023?

Yes

Yes, but we have announced that we plan to stop sourcing from Myanmar

No, we have now left and no longer have any ongoing production in Myanmar

Part III: Heightened human rights due diligence approach in Myanmar

This section will explore your approach and practices to human rights due diligence in the high-risk context of Myanmar.

7. Which of the below mechanisms do you currently utilise in the context of Myanmar?*

	Yes	No	Not sure
Human rights due diligence guideline in conflict-affected contexts like Myanmar	X		
Public disclosure of an up-to-date list of direct and indirect suppliers in Myanmar	X		

	Yes	No	Not sure
Requirement for suppliers' to undertake a human rights self-assessment questionnaire (SAQ)	X We use the independent industry tool HIGG FSLM to assesses among others health and safety, working hours, employee treatment.		
Supplier code of conduct that includes human rights	X		
Your company has its own field office in Myanmar	X		
Regular field visits/inspection to your suppliers in Myanmar	X		
Requirement that third-party audit to be undertaken across your Myanmar suppliers	X 10 of the factories that we are working with are enrolled in a project initiated by the EU called "SMARTs Factories Programme" on Workplace Relations & Dialogue which includes onsite assessments.		
Involvement of the Factories and General Labour Laws Inspection Department		X	
Institution of remediation and grievance mechanisms at each supplier site	X		
Training for suppliers on human rights	X		

**Please feel free to add any further comments*

8. How often do you undertake field visits/inspection to your suppliers in Myanmar? Please tick as many as apply.

Annually

- Regularly (more than once per year)
- In case of reported allegations
- Never
- Not sure

Please feel free to provide any further information on how you undertake field visits/inspection to your suppliers in Myanmar: We have highly competent local teams on the ground who are in close dialogue with suppliers and local stakeholders and visit factories regularly.

9. How often do you have a third-party factory audit in Myanmar? Please tick as many as apply.

- Annually
- Regularly (more than once per year)
- In case of reported allegations
- Never
- Not sure

Please feel free to provide any further information on third-party auditing in Myanmar:...

10 of the factories that we are working with are enrolled in SMARTs Management Systems Programme on Workplace Relations & Dialogue which includes onsite assessments. Additionally, all our supplier factories are assessed against the independent industry tools HiGG FEM/FSLM.

The frequency can vary depending on risks identified.

10. Which stakeholders do you engage in your due diligence process? Please tick as many as apply.

- Workers
- Trade unions in Myanmar
- Workplace Coordinating Committee (WCC)
- Global union federations (eg IndustriALL Global Union)
- Multi-stakeholder initiatives (MSIs)
- Civil Society Organisations
- SMART Myanmar
- MADE in Myanmar
- Other. Please specify: for example: Eurocham, Myanmar Centre for Responsible Business, UNDP, Delegation of the European Union to Myanmar.

Please detail how you engage with the above stakeholders: We have regular meetings with all relevant stakeholders and identify the salient risks together. Based on this, we develop mitigation plans – consulting and collaborating with relevant stakeholders in developing and where useful also

implementing them, resulting in projects and programmes such as Made in Myanmar ([MADE in Myanmar Project Launch – EuroCham Myanmar \(eurocham-myanmar.org\)](#)), a dedicated OSH programme in collaboration with ILO ([Occupational safety and health in Myanmar Global Supply Chains – A Vision Zero Fund Project - Phase II \(ilo.org\)](#)). In case we would identify any potential issue – either based on our own assessments, 3rd party assessments or raised by our stakeholders, we have clear processes in place to assess and where needed re-solve and remediate and issue.

11. Do you have a grievance mechanism that workers in Myanmar can access? Please tick as many as apply.

- Yes, through our company’s grievance mechanism
- Yes, through Myanmar’s Dispute Resolution system
- Yes, through multi-stakeholder grievance mechanisms
- No
- Not sure
- Other. Please specify: We set up the app worker grievance mechanism in the factories through “Labor Solutions” ([WOVO | Technology to Engage Workers + Suppliers | Labor Solutions](#)). All factories are required to maintain grievance mechanisms.

Please provide further details on how the grievance mechanism (if any) is communicated with workers: All workers have access to WOVO app by Labour Solutions to raise their grievances anonymously.

12. How are you made aware of human rights concerns in your supply chain? Please tick as many as apply.

- Through factory owners
- Through existing grievance mechanism
- Through civil society organisations
- Through trade unions
- Through Workplace Coordinating Committee (WCC)
- Other. Please specify: We have an experienced team on the ground in Yangon working closely with our suppliers and local stakeholders to ensure the rights of workers are upheld.

13. When an allegation is raised, what is your standard procedure to address the issue?

We take all allegations very seriously. Our standard routine is to investigate the allegation immediately through unannounced audits to establish facts and evidence. Once we have this, we take action, such as ensuring access to remedy for any violation committed, implementing our minimum requirement routines, and engaging with relevant experts and stakeholders when necessary.

14. Please feel free to provide any further information on how you undertake human rights due diligence that you would like us to know.

We recognise the need for enhanced due diligence and a continuous work to ensure we are conducting responsible business in line with UN Guiding Principles on Business and Human Rights (UNGPs), OECD guidelines and relevant ILO conventions and have taken necessary actions. We are continuously evaluating the situation in close dialogue with relevant stakeholders and are seeking independent advice on this complex matter.

Part IV: Business decision in Myanmar

15. We understand that the decision as to whether to remain or to discontinue sourcing from Myanmar is complex. Please provide any information on how your company has reached its current business decision in Myanmar.

We are in close dialogue with a wide range of stakeholders, regularly assessing various risks against each other – including but not limited to effects of our decisions or for example the ability to uphold human rights within our supply chain and the contributions of our sourcing to people's livelihoods.

Part V: Responsible exit from Myanmar

*We are asking brands to answer this section if you have either already stopped sourcing from Myanmar, or have announced that you will stop sourcing from Myanmar in the future. **If you plan to continue to sourcing from Myanmar, please skip this section.***

16. Final order placement and final shipment dates (Anticipated if you are planning your exit)
17. Total number of workers being laid off in all suppliers (Anticipated if you are planning your exit)
18. How long in advance have you let your suppliers know about the exit before stopping your orders?
19. Which stakeholders do you engage in your decision and preparation of the exit? Please tick as many as apply.

- Workers
- Trade unions in Myanmar
- Workplace Coordinating Committee (WCC)
- Global union federations (eg IndustriALL Global Union)
- Multi-stakeholder initiatives (MSIs)
- Civil society organisations
- SMART Myanmar
- MADE in Myanmar
- Other. Please specify:.....

20. How do/did you mitigate the impacts of the exit on workers? Please tick as many as apply.

- Maintain open lines of communication with relevant supply chain partners

- Require suppliers to report their plans for terminations in advance to review these in line with your Codes of Conduct
- Seek evidence of payment of workers at the end of the exit plans, including all severance and benefits payable for those affected
- Other. Please specify:.....

Thank you for your continued engagement with BHRRC on our work in Myanmar!

Please contact Hanh Nguyen - Senior Labour Rights Researcher at nguyen@business-humanrights.org and Natalie Swan - Head of Labour Rights Programme at swan@business-humanrights.org if you have any questions following this survey.