



Agreements to Eliminate **Gender-Based Violence and Harassment** in Lesotho





Workers' Rights Watch

Workers' Rights Watch is an independent, non-profit, monitoring organization that investigates violations of gender-based violence and harassment, and other violations at the Nien Hsing factories in Lesotho with the ability to issue remedies in accordance with the binding Anti-GBVH agreement established in 2019.

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EXECUTIVE SUMMARY

In 2019, landmark agreements were signed by three leading apparel brands, a major supplier of denim, and a coalition of labor unions and women's rights organizations to prevent and address gender-based violence and harassment (GBVH) in garment factories in Lesotho. Ten thousand garment workers were producing denim clothing in five factories owned by Nien Hsing Textile Co., Ltd., (Nien Hsing) supplying international brands Levi Strauss & Co., Kontoor Brands (Lee and Wrangler Jeans), and The Children's Place. The binding agreements were reached after an investigation conducted by the Worker Rights Consortium (WRC), on behalf of the Council on Ethics of the Norwegian government pension fund, identified widespread gender-based violence and harassment at the facilities.

Under the agreements, Nien Hsing committed to a robust Program to Eliminate GBVH in Lesotho (Anti-GBVH Program), centered on a mechanism independent of the company to field and investigate worker complaints and ensure remedies, including terminations of perpetrators where appropriate. Nien Hsing's commitments are enforceable through agreements with the apparel brands, which obligate them to use their economic power to ensure its compliance.

"Tackling this critical global and industry-wide issue requires ongoing coordination and commitment across key stakeholder groups, as there is no 'one size fits all' solution. Through efforts such as the Anti-GBVH agreement in Lesotho the establishment of clear guidelines around GBVH in our supplier code of conduct and a commitment to hold suppliers and ourselves accountable for results, we've seen firsthand the positive impact of a holistic approach to addressing gender-based violence and harassment."

—Jeffrey Hogue, chief sustainability officer at Levi Strauss & Co.

"Our partnership with the brands, Kontoor and Levi Strauss & Co., and with Nien Hsing Textile, forged through binding and enforceable agreements signed in 2019, have allowed us to establish a comprehensive program, with a groundbreaking independent complaint mechanism."

—Lesotho unions and women's rights organizations

Sexual violence against garment workers is a well-documented worldwide problem. The Lesotho Agreements represent the first instance in which brands and their supplier have entered into enforceable agreements with worker representatives to stop GBVH and protect workers.

This report details the ongoing process of implementing the groundbreaking Anti-GBVH Program at Nien Hsing, established in 2020 through these landmark agreements. Three years into the implementation of the program, major strides have been made to root out GBVH, progress achieved in spite of the enormous challenges generated by the Covid-19 pandemic – factory shutdowns, reduced orders and workforce size, and health-related barriers to conducting in-person trainings. The path toward eliminating GBVH and achieving genuine cultural shifts when broader patriarchal norms exist requires time, yet the impacts of the program to date are substantial and have created a safer environment for women workers at the Nien Hsing facilities.

Since February 2021, Workers' Rights Watch (WRW), the independent monitoring organization established to oversee the Anti-GBVH Program, has responded to dozens of complaints, conducting 81 individual in-depth

investigations from February 2021 through November 2022 and directing disciplinary action against harassers in numerous instances, up to and including the termination of the harasser. Knowledge of the Anti-GBVH Program, including the complaint mechanism available to all workers, is broad across the Nien Hsing workforce. Workers' understanding of GBVH, and of their rights, has increased markedly, through unprecedented education and awareness programs, a process that has disrupted the long-held acceptance of these behaviors. Most importantly, the incidence of GBVH in the factories has been substantially reduced, though elimination of violations altogether will undoubtedly take more time as the implementation of the program continues.

Memoranda of understanding (MOUs) that the factory group signed with trade unions to ensure that associational rights are protected have played a pivotal role in the effective implementation of the program. Along with protections for associational rights embedded in the agreements with the brands and Nien Hsing, the MOUs have ensured that the three unions are able to freely operate within the factories and carry out their vital role, including worker education and the facilitation of complaints to WRW. Notably, as the workforce in the Nien Hsing factories contracted due to a pandemic-driven decline in orders, layoffs that took place were managed via direct engagement with the unions. Workers received full severance and fair treatment through this process, unlike many other workers around the world who have faced wage theft and discriminatory dismissals during the pandemic.¹

Bringing together women's rights organizations and trade unions has been a unique element of this approach and program, ensuring strong emphasis on a women's rights approach, alongside protection for people's rights as workers. For example, the women's organizations and unions worked jointly to formulate the training curricula and educational materials that are the basis for the intensive two-day GBVH trainings which more than 6,000 workers and supervisors had received by the end of 2022.

GBVH continues to plague workers across Lesotho's garment industry.² At Nien Hsing, however, workers have achieved genuine progress and enjoy a degree of protection from GBVH that does not exist elsewhere in Lesotho – or, indeed, across virtually the entire apparel supply chain.³

Full statements by brand signatories, from which the quotes above are excerpted, are included in Annex Two of this report.

"Kontoor views the information and reporting hotline and the subsequent investigation and remediation processes as the keystone of the program. Today the information and reporting hotline provides workers with a reliable and confidential means through which to report their grievances without fear of reprisal."

—*Kontoor Brands*

1 BACKGROUND: INVESTIGATIONS, FINDINGS AND RECOMMENDATIONS FOR CORRECTIVE ACTION AT NIEN HSING

In 2018 and 2019, a WRC investigation exposed severe and extensive sexual violence and coercion affecting workers at Nien Hsing's garment factories in Lesotho. Nearly two-thirds of the women from three factories interviewed by the WRC reported having experienced sexual harassment or abuse or having knowledge of harassment or abuse suffered by co-workers. Women workers from all three factories identified GBVH as a central concern, with many reporting cases of sexual coercion. WRW will not summarize the WRC's findings in this report; these can be reviewed in great detail in the public report available on the WRC's website.⁴ The GBVH identified at these facilities violated workers' rights under Lesotho's labor laws, international standards, and the codes of conduct of the brands whose clothes these workers produce.

The vulnerability of women workers and the fundamental power imbalance between workers and supervisors was exacerbated by Nien Hsing's suppression of workers' right to freedom of association. This left them unable to act collectively to raise concerns and demand an end to these abuses.

Acting on these findings, the WRC urged a range of corrective actions to protect the workforce at Nien Hsing. Most significantly, the WRC recommended that Nien Hsing's buyer brands come to the table with worker representatives and negotiate a comprehensive and binding agreement to address GBVH. Notably, the WRC did not recommend that buyers cease doing business with Nien Hsing, but rather that buyers condition ongoing business on progress toward the elimination of GBVH.

Three unions with members at Nien Hsing and two of Lesotho's leading women's organizations formed a coalition to pursue an agreement with the brands. An extensive negotiation took place among the parties and was concluded in August of 2019.

2 ENFORCEABLE, BINDING AGREEMENTS SIGNED

Five Lesotho-based trade unions and women's rights organizations (Federation of Women Lawyers in Lesotho, Women and Law in Southern Africa Research and Education Trust – Lesotho, the Independent Democratic Union of Lesotho, the National Clothing Textile and Allied Workers Union, and United Textile Employees), as well as U.S.-based Solidarity Center, Worker Rights Consortium and Workers United, signed a set of binding agreements with Nien Hsing Textile and Levi Strauss & Co., The Children's Place and Kontoor Brands to prevent and address GBVH at five factories owned and operated by Nien Hsing in Lesotho.⁵

The agreements established a comprehensive program with the following primary elements:

- The creation of a non-profit investigative body entirely independent of Nien Hsing, to receive and investigate worker complaints of GBVH, with the power to issue findings and *direct* Nien Hsing to implement remedies, up to and including termination of harassers.
- A confidential, toll-free information line, run by the women's rights organization FIDA, that workers can use to access information and bring complaints of GBVH.
- A massive worker education program with unions taking a leadership role, focused on GBVH and on the program's complaint process, involving an interactive two-day workshop for all Nien Hsing employees, with no loss of wages when employees participate.



- An oversight body with equal representation from brands and from unions/civil society.
- A binding obligation on the part of the signatory brands to use their economic leverage to reverse any non-compliance by Nien Hsing with its commitments.
- A definition of GBVH, within the agreements, that instrumentalizes ILO Convention 190⁶ on Eliminating Violence and Harassment in the World of Work (making these the first binding agreements to incorporate this broad, intersectional definition).
- Strong protections for freedom of association, recognizing that it is a fundamental enabling right for workers to be able to collectively address GBVH.
- A brand obligation to provide funding for the first two years of the program.⁷

The program is the first agreement to incorporate the definition of violence and harassment from the International Labor Organization's Convention 190, a milestone global standard approved in June 2019 by governments, employers and workers. It partially borrows its model for worker protection and employer accountability from the Accord on Fire and Building Safety in Bangladesh (now the International Accord for Health and Safety in the Textile and Garment Industry)⁸ and the Fair Food Program,⁹ two groundbreaking initiatives centered on binding worker-brand agreements that have brought about sweeping transformation of working conditions in their respective spheres.

Before reviewing progress on implementation of the program, it is important to note two commitments made by Nien Hsing management, at the request of the union. These commitments, made prior to the signing of the Lesotho Agreements in August 2019, created essential baseline improvements in the workers' rights environment at the factory that enabled the progress on GBVH. One concerns the structure of employment at the factory; the other concerns Nien Hsing's relationship with the unions.

2.1 End to daily employment contracts— a key driver of coercive control

One of the primary drivers of the GBVH at the factories was the vulnerability of workers arising from the use of daily, short-term contracts for most workers hired at the company. With no limit on how long workers could be kept on such contracts, their supervisors wielded significant discretionary power in determining if and when a worker would receive permanent employment status. Since workers on short-term contracts could be terminated by management at will, while permanent employees had substantial employment protections, the power of supervisors to grant or withhold permanent status from the workers in their charge gave them tremendous coercive power over workers, leaving female workers dangerously at risk of abuse and exploitation.

After the WRC's investigation and at the request of the three factory unions, Nien Hsing agreed, in 2019, before the Lesotho Agreements were signed, to eliminate short-term contracts, except in limited cases of genuinely temporary work. This was a crucial step that eliminated the primary means previously used to coerce women workers. As part of an agreement with the unions, this reform was coupled with an extension of the probationary period for new hires from three to four months, after which their employment becomes permanent. To limit workers' vulnerability while on probation, the Agreement on the Prevention and Elimination of Gender-Based Violence and Harassment ("the Nien Hsing Agreement"), and WRW's investigative protocols, include special protections for workers on probation.

2.2 Memoranda of understanding with trade unions and protecting freedom of association

Workers' ability to act collectively to protect their rights is vital in challenging gender-based power inequality in the workplace. Years of opposition by management toward the three factory unions had severely limited their growth and ability to function in the factory, thereby denying workers one of the most powerful tools to combat GBVH. For this reason, protecting associational rights by prohibiting any form of anti-union retaliation or interference with workers' exercise of their right to organize was a prerequisite for other elements of the program.

After the WRC's investigation, but prior to the negotiation of the Lesotho Agreements, Nien Hsing signed memoranda of understanding with all three unions, committing to respect associational rights, acknowledging the right of the union to represent its members in the workplace, and providing a degree of factory access. Management has generally respected associational rights since 2018, by complying with the terms of these memoranda and by negotiating, directly with the three unions, the binding Nien Hsing Agreement.

The agreement itself includes important additional protections for associational rights, which are enforceable through the same robust means as all other provisions of the agreement. As a result of management's shift in posture and its concrete commitments, the unions have been able to grow in membership and play a larger role in representing and defending the rights of workers in the workplace, providing an additional layer of protection from GBVH.

Impact of Covid-19 pandemic on Lesotho garment industry

Lesotho is Africa's second-largest exporter of clothing, after Kenya, contributing approximately 20 percent of the country's gross domestic product.¹⁰ Garment factories are primarily owned by foreign investors from Taiwan and South Africa,¹¹ with the majority—75 percent—of factories owned by foreign nationals.¹² Ninety-five percent of the industry's exports are to neighboring South Africa and the United States.¹³ Lesotho's garment industry is the largest private-sector employer in the country, with approximately 45,000 working in the sector prior to the pandemic,¹⁴ falling by the second half of 2021 to 33,958 workers.¹⁵ Approximately 80 percent of Lesotho's garment workers are female,¹⁶ while most supervisors and managers are male.

As in other garment-exporting countries, the Covid-19 pandemic sent shockwaves through Lesotho. The World Bank describes the impact of the pandemic on the country as "devastating"¹⁷ with almost a third (30.5 percent) of the population now living in extreme poverty.¹⁸ These economic problems have been further exacerbated by high inflation combined with stagnant wages. In May 2021, Lesotho's inflation rate was 6.9 percent,¹⁹ while the inflation rate for food was 10.6 percent.²⁰ Concomitantly, minimum wages in the

garment sector were stagnant from 2019 – 2021, after the government of Lesotho chose not to increase minimum wages in 2020, citing the Covid-19 pandemic.

This stagnation in wages led to a national strike with 40,000 garment workers taking to the streets in May 2021.²¹ During the strike, authorities used excessive force to control crowds, leading to injuries and fatalities, including one worker shot by military personnel.²² The strike also resulted in the closure of many garment factories for a period of weeks. The industrial action ended in June 2021 after the government announced new minimum wages for 2021–2022, with the minimum wage for factory workers increasing by 14 percent.²³

The intermittent closures and a substantial decline in orders from international brands also impacted Nien Hsing's financial situation, resulting in its decision to close multiple facilities in Lesotho. In 2020, Nien Hsing closed its knitwear facility, Glory International; in September 2021, Nien Hsing International was closed with washing and laser operations transferred to Global Garments; and most recently, C&Y Garments was closed. By the end of 2021, Nien Hsing's workforce in Lesotho was reduced to 4,339 workers from an original workforce of more than 10,000 prior to the pandemic.

3 IMPLEMENTATION AND IMPACTS

The Anti-GBVH Program was formally launched in February 2021, after substantial, and unavoidable, delays due to country-wide lockdowns and other pandemic-related dislocations.

As described in detail herein, FIDA, WLSA, IDUL, UNITE, and NACTWU play vital roles in program implementation and oversight. The Solidarity Center has provided and continues to provide extensive technical and programmatic support to WRW and the Lesotho organizations across all program elements, drawing on its program management experience across the globe. The WRC provides guidance on investigative procedures, program governance, and related matters, and engages with Nien Hsing to help ensure that it discharges its obligations under the agreements. Workers United engages with brands on program implementation and works with the Nien Hsing unions. The brands, through their membership on the Oversight Committee, perform a vital governance role and contribute in numerous other respects. Nien Hsing management is involved in program implementation on a daily basis, while respecting WRW's independence. Most importantly, the workers of Nien Hsing, who are the focus of the program, are also agents, and their participation in investigations and the training program, and their peer-to-peer communications, are essential to its functioning.

The three central program elements are the investigation and remediation process, the complaint mechanism, and the training program.

From February 2021
to November 2022

81

INVESTIGATIONS
COMPLETED

404

CALLS RECEIVED

6,159

PEOPLE ATTENDED
TWO-DAY GBVH
TRAINING

3.1 Workers' Rights Watch: Complaint Investigation, Remedy, and Accountability

Workers' Rights Watch (WRW) was established 2020 as an independent, non-profit organization with a mandate to investigate and resolve worker complaints of gender-based violence and harassment at Nien Hsing Lesotho. WRC receives complaints, carries out investigations, reaches findings, and directs remedies when it finds violations. WRW is governed by an oversight committee made up of representatives of the unions and women's rights organizations on the one hand, and brands on the other, with equal voting power, and a neutral chair who is the deciding vote in the event the parties cannot agree on a governance matter.²⁴ Investigations determine whether there has been a violation of the Program Code of Conduct (Code of Conduct) which was established through the Nien Hsing Agreement and negotiated among the Lesotho unions and women's rights organizations, the brands, and the employer.

Nien Hsing is obligated, under the Lesotho Agreements, to implement the remedies WRW decides are necessary, up to and including dismissal of managers or supervisors who are found to be perpetrators of GBVH. Nien Hsing must comply whether or not its management agrees with the finding and the remedy. By vesting the power to address abuses and protect workers in a body entirely independent of factory management, the Agreements created a process for redress that workers can trust. Given the history at the factory, including repeated failures by management to address complaints of GBVH, workers could not have been expected to place their trust in a program controlled by management, and without that trust, no process can succeed. Assigning this role and power to WRW is a defining feature of the Agreements and represents a fundamentally different approach from those commonly utilized in apparel supply chains to address GBVH.

WRW is headed by Assessor Motšeo Senyane,²⁵ who directs the work of two investigators. These investigators interview the complainant, the alleged harasser, and witnesses, as well as review any relevant information or documentation gathered as part of an investigation.

Over the course of 2020, WRW staff, with the support of the Solidarity Center and the WRC, undertook extensive training on GBVH and investigative methods, prepared and finalized investigative policies and protocols, and established a secure database to store case information.

WRW processes complaints in the following manner: Upon receipt of a complaint referred from the Information Line (described below), WRW investigators determine whether to launch an inquiry, which it does only with the consent of the complainant. If an inquiry is launched, an investigator from the WRW staff is assigned to gather evidence. The investigative process consists of interviews with the complainant, the alleged harasser, and other relevant witnesses and the identification and review of any documentary and/or physical evidence that bears on the case (*See Figure 1, below, for a flow chart of the WRW investigation process*). Nien Hsing is obligated to provide any evidence requested by the investigator and to release any workers needed for an interview from their job responsibilities. Once the investigator completes evidence gathering, they provide the evidence to the Assessor in an investigative report. The Assessor reviews and analyses the evidence and makes a determination as to whether a violation of the Code of Conduct has occurred.

Where the Assessor answers this question in the affirmative, she then determines the proper remedy, conveys it to Nien Hsing management, and works with management to ensure the remedy is implemented.

Over the course of 2021, WRW worked with Nien Hsing management to revise company internal regulations to align with the Code of Conduct and conducted workshops with management on the WRW investigation process and Nien Hsing's obligations in relation to investigations under the Lesotho Agreements.

An additional responsibility of WRW is to oversee periodic surveys of workers on the work culture in relation to GBVH at the Nien Hsing factories. WRW oversaw the completion of this first culture study in 2021, for which more than 1,000 workers were surveyed about their perspectives on the work culture at the factories, perceptions of GBVH, and their knowledge of the Anti-GBVH Program. The findings of the survey are available on WRW's website.²⁶

3.2 The GBVH training program: education and awareness raising workshops

A critical component of the program is to increase awareness of GBVH in the workplace and to ensure that Nien Hsing workers and supervisors are fully informed about the complaint and investigation process, their responsibilities in relation to the Code of Conduct, their right to utilize the complaint mechanism, and the means for doing so.

To achieve these goals, program partners developed curricula for, and facilitated, two-day education and awareness workshops in the Nien Hsing factories. The purpose of these workshops is to provide a space to discuss gender equality and GBVH—what it is, its impacts and root causes—and for employees to recognize their role in changing the culture in the factories to one that is anti-GBVH.

"Since the workshops conducted by the unions and women's rights groups, our own supervisor has changed a lot."

—A worker at Global Garments

The interactive workshops are jointly facilitated by union leadership and women's rights advocates who are trained as facilitators and who use a peer education model to guide participants in groups of 25 or less through discussions.



The workshops detail the scope of the Anti-GBVH Program, including the purpose of the confidential Information Line, how to file a GBVH complaint and the critical role of the unions and women's rights organizations as founders of this program, with support and cooperation from Nien Hsing and the international brands.

Separate curricula were developed for managers and workers to account for their differing roles within the workplace. The manager curriculum was translated into Mandarin, and several managers' workshops were held with interpreters to accommodate those with Mandarin as a first language.

There was initially some resistance by the managers, including the Mandarin speakers, to participating in the workshops, and racial bias surfaced in this context that needed to be worked through since the sessions were run exclusively by people from Lesotho who are Black, while participants were primarily from East Asia and mostly men.

Solong Senohe, UNITE general secretary, observed that one of the significant challenges to program implementation involved cultural and racial tensions between Chinese managers and the union and women's rights organization staff. Translating program materials into Mandarin and providing interpreters for workshops for Mandarin-speaking managers went a long way toward addressing some of the communication issues, but work remains.

The initial goal was for 7,000 workers to have completed the education and awareness workshops by the end of August 2021. The Covid-19 pandemic required that in-person workshops be suspended for extended periods of time. When in-person gatherings became possible, identifying locations for the workshops large enough to meet Covid-19 safety precautions posed difficulties. Despite these challenges, program partners worked with Nien Hsing management to organize employees and hold workshops whenever and wherever possible.

By the end of November 2021, 122 workshops were conducted for 2,705 workers, supervisors, and managers (1,260 women, 1,202 men and 141 who chose not to disclose their gender or did not identify as male or female). By the end of November 2022, 158 workshops were conducted for 3,454 workers, supervisors, and managers (2,245 women, 1,207 men, and two who did not disclose their gender). In total 6,159, that is the majority of Nien Hsing's employees, have attended the two-day workshops. Also, 21 security guard supervisors employed by G4S and Security Lesotho but contracted by Nien Hsing to provide security at the main gates of the factories were provided training in 2022 on gender-based violence and harassment and the Anti-GBVH Program at the Nien Hsing factories.

Program partners developed an awareness-raising strategy for the Anti-GBVH Program, covering its purpose and how workers can use it to prevent and address GBVH in the Nien Hsing factories. These include radio jingles, social media engagement, the development and distribution of an animated video describing the program, and the development of the WRW website.²⁷ Hard copy educational materials were also produced and distributed, including 200 posters displayed at the Nien Hsing factories and 20,000 "Know Your Rights" booklets (10,000 in Sesotho, 7,000 in English and 3,000 in Mandarin).

During 2022, the education and awareness team also collaborated with a local radio station to run eight programs, covering such topics as: Lesotho legislation and its implications for women and gender-based violence and harassment, ILO Convention 190 on Eliminating Violence and Harassment in the World of Work, the Anti-GBVH Program at the Lesotho Nien Hsing factories, and women workers' rights. The team also hosted four roundtable discussions about the program and workers' rights with Lesotho government departments and agencies, including the Ministry of Labor, the Ministry of Gender, the Directorate of Disputes Prevention and Resolution, and the Lesotho National Development Corporation.



3.3 Information line and independent complaints mechanism

The primary pathway for Nien Hsing workers to raise complaints is through a toll-free, confidential Information Line that is hosted by FIDA and is entirely independent of Nien Hsing management. The information line operates five days per week. It is a crucial feature of the Information Line that all calls are fielded by staff of FIDA, an organization renowned in Lesotho as an advocate for women. Trained intake counsellors receive calls from workers who are either requesting information about the program or about GBVH or are reporting Code of Conduct violations. In the latter case, after a thorough intake process, and if the caller consents, the caller's complaint is referred to WRW. Callers who report labor rights violations unrelated to GBVH, and therefore outside the scope of the program's authority, are referred to other organizations, often unions, for assistance.

Over the course of 2020, FIDA, with the support of the Lesotho partners, the Solidarity Center and the WRC, developed a procedures manual and training for the intake counsellors. FIDA also worked with a technical consultant to develop a secure database to house information gathered from callers. The Information Line started operations in early 2021.

In the 10 months from February to December 2021, the Line received 180 calls, with the numbers increasing month by month as awareness of the new program and confidence in the Information Line and in WRW grew within the factories. These 180 calls resulted in the referral of 35 GBVH complaints to WRW for investigation.

From January to end of November 2022, the Information Line received 224 calls of which 46 complaints of either GBVH or retaliation for reporting GBVH were referred to WRW for investigation.

FIGURE 1. *The Investigation Process of Workers' Rights Watch*



Notes

* Immediately after the first interview, Nien Hsing is notified of an investigation and informed that WRW might request that people attend an interview. At this point, the complainant is not named to management nor is the nature of the complaint shared with them.

** During this stage, the investigator explains confidentiality, limits to confidentiality and the whole process of investigation to the complainant. The investigator also assists the complainant to sign a non-disclosure agreement (NDA) and consent-to-investigate form. It is also at this stage when the complainant is asked if they feel safe so or whether they may require interim relief.

Figures 2 and 3 below present data on the disposition of worker complaints referred to Workers' Rights Watch, including investigative outcomes. Figure 2 covers the period February through December 2021 and Figure 3 the period January through November of 2022. In the aggregate, there were 81 complaints over the two years, culminating in 44 GBVH investigations completed by the Workers' Rights Watch investigative team.

Not all complaints led to completed investigations, for two reasons. Under the program, complainants have the right to withdraw their complaint at any time, which leads to the cessation of the investigative process. Additionally, some complaints received by Workers' Rights Watch involved allegations of misconduct unrelated to GBVH and therefore outside the scope of WRW's GBVH investigation protocol.

In the 44 completed GBVH investigations over the 22-month period, WRW's review of the evidence led to a finding in 28 cases that violations of the Code of Conduct had been committed. Pursuant to each finding, the Assessor directed disciplinary action, up to and including dismissal of the harasser, as well as other remedies. Nien Hsing management, under the terms of the GBVH Agreements, was obligated in all cases to implement the disciplinary action the Assessor deemed necessary. Further discussion of remedies can be found below in the review of each year's data; however, because of the need to protect the privacy of complainants, it is not possible for WRW to disclose the specifics of any case, as this could lead to the identification of the individuals involved. In 16 investigations, WRW did not find a violation of the Code of Conduct.

FIGURE 2: WRW Investigation Outcomes, Feb – Dec 2021

Investigation outcomes, Feb – Dec 2021	No. of cases
Total Number of Completed GBVH Investigations	20
Violation Found, Remedial Action Directed	13
No Violation Found	7
Investigation Not Pursued; Complaint Out of Scope or Withdrawn by Complainant	11
Complaint Involved Freedom of Association	4
Total Complaints	35

In 2021, 35 complaints were referred to WRW. Twenty GBVH investigations were completed in response to these complaints. In 13 of these 20 cases, the Assessor determined, based on the evidence gathered, that a violation of the Code of Conduct had occurred. In these cases, the Assessor selected the appropriate remedy and directed Nien Hsing management to implement it. In seven cases, the Assessor determined, based on the evidence, that no violation of the Code of Conduct had occurred.

The Assessor determines remedies based on the severity of the violation and on whether the harasser has committed violations in the past. Remedies varied accordingly among the 13 cases. The Assessor directed that eight harassers receive a final written warning, the last step before a person is dismissed from employment. For these eight harassers, if they commit any further violation, their employment must be terminated by Nien Hsing. In some of the cases in which a violation was found, and the penalty chosen by the Assessor fell short of dismissal, the Assessor also directed Nien Hsing to reassign the harasser to a different factory building, to preclude further contact during work hours with the complainant.

In a particularly severe case, involving physical abuse, the Assessor directed the harasser's immediate dismissal. WRW also brought this case, with the complainant's consent, to the police.

In many cases, the Assessor also ordered that the harasser undergo mandatory GBVH training, in addition to other remedies.

Not all referrals in 2021 led to a complete investigation. Four of the 35 complainants chose to withdraw their complaint at some point in the process. In addition, in seven cases, initial inquiry indicated that the allegations brought by the complainant did not involve GBVH, but other alleged violations of workers' rights, outside the scope of the program. In such cases, and with permission from the complainant, the cases were referred to factory management. In four cases, the complaint related to an alleged freedom of association violation rather than GBVH. This is within the scope of WRW's scope of authority; however, upon investigation, no violation was identified in these cases.

FIGURE 3: WRW Investigation Outcomes, Jan – Nov 2022

Investigation outcomes, Jan – Nov 2022	No. of cases
Total Number of Completed GBVH Investigations	24
Violation Found, Remedial Action Directed	15
No Violation Found	9
Complaints Currently Under Investigation	2
Investigation Not Pursued; Complaint Out of Scope or Withdrawn by Complainant	18
Total Complaints	46²⁷

Figure 3 presents the data on investigations conducted in 2022. Pursuant to the 46 complaints it received, WRW completed 24 investigations. WRW found violations in 15 cases; in each case, the Assessor determined disciplinary action and other remedies and directed Nien Hsing to implement them (with the exception of one recent case, where, at the time the data in this report were compiled, the Assessor was in the process of determining the appropriate corrective action). As in 2021, the remedies varied with the severity and specific circumstances of each case. The Assessor directed that nine harassers, in addition to other remedies, receive a final written warning. In nine cases, no violation was found.

Notably, in four of the cases where WRW found violations, they involved retaliation against the complainant. One of those cases involved the retaliatory dismissal of a complainant. In that case, in addition to appropriate disciplinary action for the perpetrator, the Assessor ordered the reinstatement of the improperly dismissed worker with back pay, as well as granting the worker the option of taking paid leave for purposes of recovery. WRW considers strong remedies for cases of retaliation to be essential to the integrity and proper functioning of the program. The Assessor, noting the several cases of retaliation against workers by supervisors for reporting GBVH, organized—in cooperation with Nien Hsing senior management—extraordinary training sessions with supervisors and union shop stewards. The purpose of these trainings was to review the Code of Conduct, including what constitutes retaliation and the associated penalties for retaliating against a worker who reports GBVH or cooperates with an investigation. The sessions occurred from May to July 2022 and involved 132 supervisors and 23 shop stewards.

Of the 46 complaints referred to WRW in 2022, in eight cases the complainant withdrew consent to continue with the investigation. In 10 cases, initial inquiry indicated that the misconduct alleged by the complainant did not involve GBVH and was therefore outside of WRW's purview. In all of those cases, the complainant gave consent for the matter to be referred to factory management.



3.4 Nien Hsing's cooperation with the Anti-GBVH Program

Under the Program, Nien Hsing committed to cooperate with WRW in several key areas:

- Make workers, managers and supervisors available for interviews in the context of investigations.
- Provide WRW all records relevant for investigations and monitoring.
- Inform WRW of any complaints of GBVH received by Nien Hsing directly.
- Accept WRW's findings and implement the remedies the Assessor directs.
- Cooperate with program partners to ensure that all workers, managers and supervisors employed by Nien Hsing attend training on GBVH.

Since the program has come into effect, Nien Hsing has largely cooperated with program partners and fulfilled its obligations. There were some instances, especially earlier on in the implementation process, in which Nien Hsing management failed initially to uphold its commitments, for example by not turning over disciplinary records to WRW and by resisting the implementation of a disciplinary action directed by the Assessor, requiring a special intervention by program partners to resolve the issue. These problems reflected an initial reluctance by management to work with WRW. However, over time, management became more accustomed to working with the organization and has since cooperated regularly with the investigative process, including by encouraging workers to report GBVH to the Information Line; sharing relevant information with WRW; releasing workers for interviews in the course of investigations; and providing WRW with proof that determinations have been implemented.

4 ASSESSING PROGRAM IMPLEMENTATION AND EFFICACY

As outlined above, all elements of the program were made operational since February of 2021:

- WRW is fielding complaints from workers, carrying out rigorous, independent investigations, and directing disciplinary action and other remedies, providing workers facing GBVH with unprecedented recourse
- The Information Line is fielding calls from workers on an ongoing basis, serving as both a vital source of knowledge for workers and the primary conduct through which workers can bring their complaints to WRW
- The training program had, by the end of November 2022, completed two-day, interactive education and training workshops with nearly 6,200 workers and supervisors

As a result of all of these activities, including the cases in which harassers were punished, most workers are now aware that there is an independent entity that can and will hold all harassers—even managers and supervisors—accountable for GBVH at Nien Hsing. In this context, workers report a change not just in the level of GBVH, but in the culture of the workplace.

One worker described to WRW the change she has witnessed since the program, and her comments capture the process of trust-building that has been essential to the program's success. When she was verbally and physically harassed by a supervisor and reported the incidents, she learned that she “was not the first target,” and action was taken against him. She described how prior to the program, another woman worker refused the advances of the same supervisor and was fired. “*Imagine: The lady was fired for being harassed by this supervisor. There was nowhere to report such matters then. This is how the program is helping people like myself to report. I am still at work, and he is not. ... Now my rights are protected by this agreement.*”



Three years into the program, most workers expressed a basic level of trust in the complaint mechanism and a willingness to report abuse through that mechanism—a fundamental transformation from the previous attitudes to reporting GBVH.

Work remains, however, on this front, as there are still workers who express reluctance to utilize the complaint mechanism, based on fear of retaliation or fatalism about the likelihood that a valid complaint would result in meaningful corrective action. For example, one worker said, “I have heard that workers will say, [...] “we will be charging the ghost to the ghost master”—in other words, they believe managers will not take action against a fellow manager or supervisor, even if ordered to do so by WRW.

One challenge the Anti-GBVH Program faces in this respect is its limited ability to share information with workers, outside the affected parties, on the outcome of its investigations. The confidentiality and privacy of complainants is an overarching priority for WRW and of utmost importance in building worker trust, but this constrains WRW’s ability to inform workers about its actions in defense of complainants and against perpetrators. Informal word-of-mouth among workers adds important value to the limited disclosure WRW can provide, and there is a broad general awareness that investigations are yielding results, but the lack of detail is a constraint in building robust trust across the entire workforce. It is not a constraint that can be removed, but one WRW and the program partners will continue to work around.

GBVH has not been completely eliminated from the Nien Hsing factories, a circumstance that Nien Hsing shares with virtually all employers worldwide. Workers are bringing complaints and workers generally still report that GBVH is a concern, thereby demonstrating a lasting need for the Information Line and work of WRW to continue to build progress.

At the same time, WRW has seen a marked reduction in incidents of GBVH. And the ongoing culture change in the factory, including the replacement of fear among workers with a greater sense of empowerment, bodes well for further progress.

CONCLUSION

The binding commitments made by Nien Hsing to implement the Anti-GBVH Program, and the binding commitments made by the brands to ensure that Nien Hsing has compelling economic incentive to follow through, have delivered substantial results, as outlined in this report. Workers at Nien Hsing now have recourse to powerful mechanisms to protect themselves from GBVH, mechanisms designed to serve workers’ interests.

The broader aim of the Anti-GBVH program is to root out deep, patriarchal norms and shift cultural attitudes within the factories to create a workplace where everyone, especially women, are safe and respected. This program has shown that change is possible, and urgently needed.

As the first program of its kind in the world without an existing model to follow, this example of an enforceable, binding agreement to tackle GBVH in apparel supply chains provides a vital learning opportunity for this kind of program to be used elsewhere in Lesotho, and around the world.

“Our situation changed a lot. We can now report incidences of GBVH. ... I speak openly to workers about how the WRW assisted me in my case and how grateful I am for them.”

—A Nien Hsing worker

ANNEX ONE: Signatories to the Agreements to Prevent and Combat Gender-Based Violence and Harassment in Lesotho

Brands

Kontoor Brands

Kontoor Brands is a global lifestyle apparel company with a portfolio of well-known denim brands: Wrangler and Lee Jeans.

Levi Strauss & Co.

Levi Strauss & Co. is one of the world's largest brand-name apparel companies and a global leader in jeanswear. Levi Strauss & Co. designs and markets jeans, casual wear and related accessories for men, women, and children under the Levi's®, Dockers®, Signature by Levi Strauss & Co.™, Denizen® and Beyond Yoga® brands.

The Children's Place

The Children's Place was founded in Hartford, Connecticut in 1969 by David Pulver and Clinton Clark. The Children's Place is a global children's apparel company with a portfolio of well-known children's clothing brands: The Children's Place, Gymboree, and Sugar & Jade.

Supplier

Nien Hsing Textile Co., Ltd.

Nien Hsing Textile was founded in 1988 in Taiwan. The company is a global manufacturer of denim fabric and garments and owns textile mills and garment factories in Lesotho, Vietnam, and Mexico.

Lesotho Unions and Women's Organizations

Federation of Women Lawyers in Lesotho (FIDA)

The Federation of Women Lawyers-Lesotho is a nongovernmental, non-profit organization founded and registered in 1988 by women lawyers in Lesotho. The Federation advocates for the promotion and protection of women's and children's rights. Over the years, its mandate has expanded to accommodate all legal issues within the public domain that affect the Basotho nation because an empowered civil society is a crucial component of any democratic system. By articulating citizens' concerns, FIDA is active in the public arena engaging in initiatives to further participatory democracy and development in Lesotho.

Independent Democratic Union of Lesotho (IDUL)

The Independent Democratic Union of Lesotho was formed in 2015 after three unions—Factory Workers Union (FAWUL), National Union of Textile Workers (NUTEX) and Lesotho Clothing and Allied Workers Union (LECAWU)—merged. The union holds the majority in the textile sector and represents workers in other sectors, including mining, construction, hospitality, retail and other manufacturing.

National Clothing Textile and Allied Workers Union, Lesotho (NACTWU)

The National Clothing Textile and Allied Workers Union is a trade union established November 14, 2014. Its mandate is to represent employees at the workplace on all work-related issues. It began by representing textile employees only, but with time and due to the large number of employees in need of the union's services, it expanded its scope to cover every employee in Lesotho. NACTWU also trains its members about their rights and employer rights at work, and about local and regional labor laws and international labor standards. The union helps its members understand union



administration and union structures so that, in the future, they can become leaders at the workplace and within society at large. NACTWU protects employees at work by improving working conditions, wages, and health and safety, and by ensuring that their employers comply with labor laws and international labor standards.

United Textile Employees (UNITE)

United Textile Employees is a registered trade union formed by textile workers in 2008 as a class-oriented trade union. Its mandate is to protect worker rights and promote the decent work agenda, which includes rights, social protection, social dialogue and sustainable employment; to fight precarious work that turns workers into slaves; to empower women to stand against patriarchal workplace issues and integrate gender issues into all union programs; and to build capacity within trade union leadership and women's structures.

Women and Law in Southern Africa Research and Education Trust (WLSA)-Lesotho

Women and Law in Southern Africa Research and Education Trust (WLSA)-Lesotho is a local NGO registered in 2000 under the Lesotho Society Act (1967). It is part of WLSA's regional network, which operates in Botswana, Malawi, Mozambique, Swaziland, Zambia, Zimbabwe and Lesotho. WLSA is a nongovernmental organization pursuing women's human rights in a legal context. Its mission is to contribute to the socioeconomic, political and legal advancement of women and children in Lesotho. Since 1989, WLSA has been the anchor and lead organization in Lesotho on issues of women's rights, strategic litigation on women's rights, empowerment of women and gender equality and has also played a key role in mentoring and providing backstopping for other women's groups in the country as well as government departments.

Non-Party Signatories to the Lesotho Agreements

Solidarity Center

The Solidarity Center is the largest U.S.-based international worker rights organization helping workers attain safe and healthy workplaces, family-supporting wages, dignity on the job and greater equity at work and in their community. Allied with the AFL-CIO and U.S. labor movement, the Solidarity Center assists workers across the globe as, together, they fight discrimination, exploitation and the systems that entrench poverty—to achieve shared prosperity in the global economy. Founded in 1997, the Solidarity Center works with unions, worker associations and community groups to provide a wide range of education, training, research, legal support and other resources to help build strong and effective trade unions and more just and equitable societies. Its programs—in more than 60 countries—focus on human and worker rights awareness, union skills, occupational safety and health, economic literacy, human trafficking, women's empowerment and bolstering workers in an increasingly informal economy.

Worker Rights Consortium

Founded in 2000, the Worker Rights Consortium is an independent labor rights monitoring organization whose mission is to promote, and help enforce, strong labor right protections in global manufacturing supply chains. The WRC conducts factory investigations, documents violations and seeks comprehensive remedies. The WRC has more than 150 university and college affiliates in the United States and Canada and also works with government entities seeking to enforce human rights standards.

Workers United

Workers United, an affiliate of the Service Employees International Union (SEIU), is an American and Canadian union that represents 90,000 workers in the apparel-textile, commercial laundry, distribution, and other related industries. Workers United is the successor to UNITE, which was formed in 1995 by the merger of the International Ladies' Garment Workers' Union (ILGWU) and the Amalgamated Clothing and Textile Workers' Union (ACTWU), unions that were an important part of the formation of the U.S. and Canadian labor movement in the early 20th century. Workers United, like its predecessor unions, is a social movement union, engaging its members in social justice struggles throughout their industries and communities, and in addition acting in solidarity with our brothers and sisters in other countries.



ANNEX TWO: PARTNER STATEMENTS ON THE PROGRAM TO ELIMINATE GBVH AT THE NIEN HSING FACTORIES IN LESOTHO

Kontoor Statement on the Program to Eliminate GBVH at the Nien Hsing Factories in Lesotho

In 2019, Kontoor Brands, Inc. (“Kontoor”) joined other stakeholders in a commitment to address Gender Based Violence and Harassment (“GBVH”) concerns at Nien Hsing factories in Lesotho. Kontoor played a crucial role in the financing, monitoring, and oversight of the Program to Eliminate GBVH at Nien Hsing factories in Lesotho (“Program”). Kontoor takes the issue of workers’ wellbeing and safety very seriously and willingly participated in this Program to help improve the working environment at Nien Hsing factories in Lesotho.

To date, the Program has successfully trained nearly three thousand workers on GBVH prevention, improved recruitment procedures (including employment contract terms), and set up an information and reporting hotline. Kontoor views the information and reporting hotline and the subsequent investigation and remediation processes as the keystone of the Program. Today the information and reporting hotline provides workers with a reliable and confidential means through which to report their grievances without fear of reprisal. As evidenced in this report, the number of cases logged through the information and reporting hotline has been decreasing, which is a testament to the success of the Program.

GBVH issues are complex and continue to evolve. There is a need for a continuous concerted effort in tackling GBVH issues in factories. We believe a strong foundation has been laid that can continue to be built upon for the monitoring, response, and resolution of GBVH issues. We hope that Nien Hsing will continue in its pursuit to eliminate GBVH from its factories.

We would like to thank all the stakeholders in this program for their fruitful collaboration. Kontoor will continue in its endeavors to improve working conditions in factories.

Statement of Jeffrey Hogue, chief sustainability officer at Levi Strauss & Co. on the Program to Eliminate GBVH at the Nien Hsing Factories in Lesotho

Tackling this critical global and industry-wide issue requires ongoing coordination and commitment across key stakeholder groups, as there is no ‘one size fits all’ solution. Through efforts such as the Anti-GBVH agreement in Lesotho the establishment of clear guidelines around GBVH in our supplier code of conduct and a commitment to hold suppliers and ourselves accountable for results, we’ve seen firsthand the positive impact of a holistic approach to addressing gender-based violence and harassment.

Statement of Lesotho unions and NGOs on the Program to Eliminate GBVH at the Nien Hsing Factories in Lesotho

The Anti-GBVH Program at Nien Hsing has created powerful instruments for workers to defend themselves, protect their rights, and ensure a workplace free from gender-based violence and harassment. Our partnership with the brands, Kontoor and Levi Strauss & Co., and with Nien Hsing Textile, forged through binding and enforceable agreements signed in 2019, have allowed us to establish a comprehensive program, with a groundbreaking independent complaint mechanism. Now workers can report abuse and trust that action will be taken to investigate and hold any perpetrators accountable. This means a great deal to women workers and to all workers.



ENDNOTES

- 1 See Worker Rights Consortium, *Fired, Then Robbed: Fashion brands' complicity in wage theft during Covid-19*, April 2021. Available at: <https://www.workersrights.org/wp-content/uploads/2021/04/Fired-Then-Robbed.pdf>. See Business & Human Rights Resource Centre, *Unpicked: Fashion & Freedom of Association*, October 2022. Available at: <https://media.business-humanrights.org/media/documents/2022-Unpicked-Fashion-and-FOA.pdf>.
- 2 See Louise Donovan and Refiloe Makhaba Nkune, "Exclusive: Workers in Factory That Makes Kate Hudson's Fabletics Activewear Alleged Rampant Sexual and Physical Abuse," *TIME*, May 5, 2021. Available at: <https://time.com/5959197/fabletics-factory-abuse-allegations/>.
- 3 In April 2022, worker representatives signed a historic agreement with clothing and textile manufacturer Eastman Exports to end gender-based violence and harassment at Eastman factories in Dindigul, in the southern state of Tamil Nadu in India. TTCU, Global Labor Justice-International Labor Rights Forum, and Asia Floor Wage Alliance also signed a legally binding agreement, subject to arbitration, with H&M. See Annie Kelly, "Murder, rape and abuse in Asia's factories: the true price of fast fashion," *The Guardian*, May 22, 2022. Available at: <https://www.theguardian.com/global-development/2022/may/22/murder-rape-and-abuse-in-asia-factories-the-true-price-of-uk-fast-fashion-jeyasre-kathiravel>. The WRC investigated gender-based violence and harassment at Natchi, at the joint request of worker representatives and brand stakeholders, following the murder in January 2021 of a young woman worker at the factory by a male company supervisor, who is currently jailed awaiting trial for her killing. See Worker Rights Consortium, *Factory Assessment: Natchi Apparel (India), Findings, Recommendations, and Corrective Action*, May 22, 2022. Available at: <https://www.workersrights.org/wp-content/uploads/2022/05/WRC-Assessment-of-Natchi-Apparel-05-22-22.pdf>.
- 4 Worker Rights Consortium, *Worker Rights Consortium Assessment re: Gender-Based Violence and Harassment at Nien Hsing Textile Co., Ltd.* August 15, 2019, available at: <https://www.workersrights.org/wp-content/uploads/2019/08/WRC-Factory-Assessment-re-Nien-Hsing-08152019.pdf>.
- 5 "The Lesotho Agreements include several mutually reinforcing instruments. One is an agreement signed by the three unions and two women's organizations and Nien Hsing, known as the Agreement on the Prevention and Elimination of Gender-Based Violence and Harassment. This agreement sets forth the elements and parameters of a comprehensive program to address GBVH and defines Nien Hsing's obligations under the program. In addition, each of the three brands signed a separate agreement with the Lesotho civil society groups, also signed by the US organizations, in which each brand individually commits to use its commercial relationship with Nien Hsing to incentivize the latter's compliance with its obligations. These "brand agreements" thus serve to enforce the agreement between Nien Hsing and the Lesotho groups. The brand agreements, which also established an oversight body for the program, are enforceable through binding arbitration."
- 6 International Labor Organization, Convention 190, https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C190
- 7 The funding obligation expired in 2021, but the program is ongoing, using other funding sources, and central elements of the agreements will remain in effect for as long as brands source from Nien Hsing, including the obligation to reduce orders at Nien Hsing if it fails to fulfill its commitments.
- 8 Bangladesh Accord, <https://bangladeshaccord.org/>
- 9 Fair Food Program, <https://fairfoodprogram.org/>
- 10 The Southern Times, "Textile Industry: Lesotho's Enslaved Economy," (February 24, 2016), <https://southernafrican.news/2016/02/24/textile-industry-lesothos-enslaved-economy/>; Equal Times, "Is Lesotho's Garment Industry an 'Ethical Alternative?'," (February 25, 2015), <https://www.equaltimes.org/is-lesotho-s-garment-industry-an?lang=en#WdUirUwZORs>.
- 11 The Southern Times, "Textile Industry: Lesotho's Enslaved Economy," (February 24, 2016), <https://southernafrican.news/2016/02/24/textile-industry-lesothos-enslaved-economy/>.
- 12 Id.
- 13 Reva, Anna, "Unlocking the Potential of Lesotho's Private Sector: A Focus on Apparel, Horticulture, and ICT," The World Bank, (2018), <http://documents.worldbank.org/curated/en/832751537465818570/Unlocking-the-potential-of-Lesotho-s-private-sector-a-focus-on-apparel-horticulture-and-ICT>.
- 14 Bureau of Statistics, "Performance of the Manufacturing Sector in Lesotho, Second Quarter 2018" (2018), http://www.bos.gov.ls/new%20folder/Copy%20of%20Economics/Manufacturing_2nd_Quarter_2018.pdf.
- 15 Bureau of statistics, "Performance of the Manufacturing Sector in Lesotho Second Quarter 2021" (2021).
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- 17 The World Bank, "The World Bank in Lesotho," (accessed July 9, 2021), <https://www.worldbank.org/en/country/lesotho/overview>.
- 18 Id.
- 19 Bureau of Statistics, "Lesotho Ministry of Development Planning," (accessed July 9, 2021), <http://www.bos.gov.ls/>.
- 20 Take-Profit.org, "Lesotho Inflation Data: Rate, CPI, Food, Harmonised," (accessed October 12, 2021), <https://take-profit.org/en/statistics/inflation-rate/lesotho/>.
- 21 See IndustriALL, "Lesotho workers strike over government failure to announce wage increases," (June 3, 2021), <http://www.industriall-union.org/lesotho-workers-strike-over-government-failure-to-announce-wage-increases>.
- 22 Id.
- 23 Lesotho Times, "14 Percent Wage Hike for Factory Workers," (June 22, 2021), <https://lestimes.com/14-percent-wage-hike-for-factory-workers/>.
- 24 The current voting members of the Oversight Committee are Emmanuel Ongeri (Kontoor Brands), Pankaj Kappor (Levi Strauss & Co.), May Rathakane (IDUL), Solong Senohe (UNITE), Sam Mokhele (NACTWU), Thusoana Ntlama (FIDA), and Libakiso Matlho (WLSA). The chair of the Oversight Committee is Matseliso Mapetla.
- 25 Ms. Senyane has more than 20 years of experience leading nonprofit organizations in southern Africa. Prior to becoming the WRW Assessor, Ms. Senyane was the Executive Director of Care for Basotho Association, an organization providing support to vulnerable populations in Lesotho.
- 26 Workers' Rights Watch, *Culture Survey 2021 - How Workers at Four Nien Hsing Textile Factories in Lesotho Describe Work Culture and Gender-Based Violence and Harassment*, 2022. Available at: <https://www.wrwolesotho.org.ls/wp-content/uploads/2022/12/Culture-Survey-of-GBVH-at-NH-2021.pdf>.
- 27 WRW website: <https://www.wrwolesotho.org.ls/>.

