



Dindigul Agreement to Eliminate Gender-based Violence and Harassment **YEAR 2 PROGRESS REPORT**

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Acknowledgments

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FOREWORD

The 'Dindigul Agreement Year Two Progress Report' commissioned by the Oversight Committee (OC) is an effort to assess the implementation of the agreement and its progress in eliminating, remediating, and preventing gender-based violence and harassment (GBVH) at Eastman's Natchi factory during January-December 2023. The report is based on key performance indicators (KPIs) developed by the OC, a multi-stakeholder group consisting of the signatories of Dindigul Agreement, including fashion brands, supplier, trade union and regional and US-based labor organizations. The KPIs and the scope of the report was shaped through several months of joint consultations and consensus-building within the OC. This process, traversing different time zones and countries, signals the possibility and promise towards transnational collaborations in addressing GBVH in the world of work.

The independent third-party assessment was led by the Global Labor Institute (GLI) at Cornell University, with support from the OC. We are grateful to the Research

Team – Prof. Sarosh Kuruvilla and Pauline Jerrentrup from GLI and Lalitha Muthu from the Indian Institute of Technology, Madras, for their deep attention and care in capturing the lived realities of garment workers at Natchi, through verification of records, extensive document analysis and stakeholder interviews.

The findings of the Year Two Progress Report conclude that there is “overwhelming evidence that the Dindigul Agreement is meeting the goals for which it was created”. More broadly, the report demonstrates the role of Freedom of Association (FOA) in eliminating, remediating and preventing GBVH. Specifically, workers testified to the efficacy of a multi-tier grievance mechanism that takes into consideration intersection of gender and caste to address both GBVH and non-GBVH related grievances. The strength of FOA is also illustrated by the finding that a majority of GBVH-related grievances were resolved through bi-weekly union-management meetings.





The report also makes a reference to “meeting under the tree” – a place where the union engages with the workers within the factory premise. This collective space, both literally and metaphorically, shows the extent of trust building and solidarity that the Dindigul Agreement has fostered among women workers, leading to their increased agency.

The Year Two Progress Report in 2024 coincides with the fifth anniversary of International Labour Organization (ILO) Convention 190 (C190), the first international treaty to address violence and harassment in the world of work. The Dindigul Agreement, which uses foundational principles from C190, offers an example that integrates C190 to bring added value to address GBVH more effectively, and to implement C190 even before its ratification. The assessment shows that the agreement’s layered nature of grievance redressal, which extends beyond garment factories and spinning mills to include transportation and hostels, is in line with the broad definition of the “world of work” as enshrined in C190. The firsthand accounts by workers at Natchi also shed light on these spillover effects to their homes and community.

In addition to highlighting the positives of this landmark agreement, the Year Two Progress Report also delves into various challenges on the ground and areas that need improvement, showing that our work is not yet complete. As the authors point out, to ensure that these progressive practices continue, it is necessary to increase sourcing and show both the supplier and the industry that it is advantageous to source from factories in the apparel industry where the risk of FOA and GBVH violations is low. The report makes a case that the success of this model hinges on more brands committing to be part of this agreement in the near future.

As the Oversight Committee, we are committed to this agreement and honored and delighted to present this report to you.

Dindigul Agreement Signatories

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Anannya Bhattacharjee

Eastman Exports:

Cibi Karthic

Gap Inc.:

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H&M Group:

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PVH Corp.:

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Tamil Nadu Textile and Common Labour Union (TTCU):

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EXECUTIVE SUMMARY

In its second year, the “Dindigul Agreement to Eliminate Gender-based Violence and Harassment (GBVH)” has made significant progress towards eliminating, remediating, and preventing GBVH at the Natchi Apparel Factory and Spinning Mills operated by Eastman Exports. Based on extensive document analysis triangulated with interviews with all relevant stakeholders to verify the reliability of the data, this report presents results in terms of both processes and outcomes.

Our assessment shows that the **processes** instituted under the agreement are working well. Trained workers show a well-rounded understanding of GBVH. There is wide awareness amongst the workers regarding how to report problems using the agreement’s multi-tier grievance mechanism. The grievance mechanism is effective, enabling speedy redressal of grievances by worker shop-floor monitors and through bi-weekly meetings between the Tamil Nadu Textile and Common Labour Union (TTCU) and Eastman management. The Internal Complaint Committees (ICC), required under India’s Prevention of Sexual Harassment Law (POSH Act), have been integrated into the grievance mechanism and reconstituted to work effectively in compliance with state laws. Stakeholders emphasized the exceptional cooperation of Eastman’s top management at the Natchi Apparel factory and Spinning Mills.

These processes translate into meaningful **outcomes**. Workers raised 242 grievances during the year of which 30 concerned GBVH issues. Redressal was exceptionally speedy, with 76% of GBVH grievances resolved within two weeks. Interviews revealed that the grievance mechanism is trusted by workers and seen as both accessible and equitable. No grievances regarding Freedom of Association (FOA) were recorded. Workers stressed that the TTCU’s continuous and frequent engagement with them, both in the factory and in their villages, as well as their proven track record of resolving workers’ problems, has helped eliminate the fear of raising grievances.

The presence of the TTCU in the factory constitutes a powerful monitoring mechanism, ensuring effective remediation and deterring violations of both GBVH and FOA. Although the focus of the agreement is on FOA and GBVH issues, the TTCU has expanded the scope of their work to address all types of grievances and has negotiated improvements in the workplace overall. FOA in the factory is unimpeded, and labor-management relations are cordial. Both the TTCU and Eastman management attest to the mutual benefits of union-management dialogue.

Overall, the evidence points to positive and meaningful progress in year two of the agreement, extending and institutionalizing processes and mechanics that were described extensively in the year one report. For continued improvement during the coming year, it is necessary to extend GBVH training to more workers, improve the understanding of the processes amongst middle management, further strengthen the ICCs, adopt more varied avenues of communication of prohibited practices, and to make minor improvements in record keeping. In sum, however, this assessment indicates a well-functioning collective agreement that is fulfilling the goals for which it was created.

A **widely held** concern volunteered by all stakeholders is that the Natchi Apparel Factory and Spinning Mills (the apparel factory in particular) are **not** functioning at full capacity. Order volumes have not recovered from their decrease after the Justice for Jayasre campaign¹, resulting in significant reductions in employment levels. The replicability, scalability, potential productivity gains, and impact on worker livelihoods of this innovative agreement can only be properly assessed if the factory is functioning at full capacity. Hence, more sourcing from global brands is key to the agreements’ sustainability, preferably prior to the more comprehensive evaluation planned for 2025.

¹ The Justice for Jayasre campaign was started by a coalition of international unions, gender justice organizations and labor groups following the murder of Jayasre Kathiravel, a young Dalit woman and union worker, by her supervisor in January 2021.

INTRODUCTION

This report assesses the progress of the “Dindigul Agreement to Eliminate Gender-based Violence and Harassment (GBVH)” at the end of its second year of operation. The Dindigul Agreement actually consists of a set of interlocking agreements. The program agreement (henceforth “the agreement”) between the Tamil Nadu Textile and Common Workers Union (TTCU) and Eastman Exports Global Clothing Private Limited, specifies the processes relating to the elimination of gender based violence at all units of the Natchi Apparel (P) Ltd and Eastman Spinning Mills (P) Ltd. Two NGOs – the Global Labor Justice (GLJ) and the Asia Floor Wage Alliance (AFWA) also signed the agreement as ‘witness signatories’. This agreement (and its first-year assessment) is publicly available and can be found [here](#).

The program agreement is supported by three individual agreements between global brands -H&M Group, Gap Inc., and PVH Corporation, and the TTCU, AFWA, and GLJ². Given that these individual agreements are confidential, this assessment **focuses only** on the program agreement between the TTCU and Eastman. All the agreements are set to expire in June 2025.

Section 1 of this report examines whether the processes established are functioning well, and we examine several process indicators, including the following: Are prohibited practices communicated to workers? Is the grievance mechanism working? Is training provided? Is Eastman management cooperating? Section 2 discusses outcomes, i.e., whether the goals of the agreement are being achieved. Through the analysis of grievances and remedies, we answer the following questions: Does the agreement demonstrate progress towards preventing, remediating, and eliminating GBVH? Does it ensure and promote Freedom of Association (FOA) and labor-management dialogue? Are there additional outcomes that demonstrate the vitality of the agreement?

² Gap Inc. and PVH Corporation did not source from the covered factories when they signed the confidential agreements in 2022, but had business relationships with Eastman Exports.



METHODOLOGY

This report is limited to the 38 Key Performance Indicators (KPIs) in eight categories regarding processes and 34 outcome KPIs in four categories selected by the Oversight Committee (OC) of the agreement. We discuss most of these KPIs in our narrative, but the full list of KPIs and the relevant evidence and data sources for each can be obtained from GLJ³.

The primary focus of our inquiry was to assess the reliability of the data underlying each KPI for the January- December 2023 period. For this purpose, we analyzed original documents, handwritten notes, meeting minutes, logbook entries, and grievance records and then triangulated the resulting evidence with interviews of key stakeholders, including workers who had raised grievances.

Our research was accomplished through a field visit of eight days facilitated by the OC, the TTCU, Eastman Management, and the program staff of the agreement (a representative of the AFWA, the on-site documentation officer and a representative of the GLJ). The lead researcher, along with a translator, visited the Natchi apparel and Eastman spinning mills factories (henceforth factories), and the hostel (where most migrant workers live). They interviewed a variety of stakeholders. Specifically, they conducted three focus group discussions with five workers in each group and had detailed interviews with four workers (including two who had raised grievances). Seven of the nineteen workers interviewed were Shop Floor Monitors (SFM). They also interviewed three members of TTCU's leadership, two Internal Complaint Committee (ICC) members, one independent assessor, one external trainer (from the feminist human rights organization CREA), five bus drivers, and five members of the implementation committee, including members of Eastmans' senior management at the factories (Sr. VP Quality Assurance and ESG and the Human Resource (HR) Manager).

Most worker interviews took place in a closed room on the factory premises. Two workers were interviewed

at the TTCU's office. In the factory, seven workers interviewed were chosen by the HR manager, while the balance was selected through random sampling from the employee register. At the request of the program staff, the TTCU introduced the researchers to the workers to ensure that workers were comfortable talking to the research team. While it is possible that interviews conducted in the factory setting along with the introduction by the TTCU could have biased workers' responses, there was still remarkable congruence between stories shared by workers randomly selected and those selected by HR, as well as those interviewed inside and outside the factory. We do not rule out the possibility, however, that if the interviews had been conducted in the villages, we may have obtained a more nuanced and/or critical picture regarding the implementation of the agreement.

Our analysis of original documents, log books, journal entries, and grievance records combined with interviews gives us confidence that the data underlying this second-year report is credible. Comparisons between the year one report and this report are ill-advised. First, the year one report was written by the labor stakeholders, whereas this report was commissioned by the multi-stakeholder OC. Second, the year one report highlighted the background and processes of the agreement, and some outcomes, whereas this report is solely focused on the KPI's provided by the OC, and whether the data for the KPI's is reliable. The different foci of the two reports lead to some differences in several datapoints. But in general, it is worth noting that year two results are broadly consistent with the progress highlighted in year one, and the grievance system and labor management collaboration appear more ***institutionalized***.

The independent and more holistic assessment planned for the third year (2025) will go beyond this KPI-focused report to address the larger issues of effectiveness, sustainability, replicability, and scalability.

3 <https://laborrights.org/publications/dindigul-agreement-oversight-committee-key-performance-indicators-kpis-year-2-january>



SECTION 1

ARE THE PROCESSES OF THE AGREEMENT FUNCTIONING WELL?

Briefly, the key findings with regard to the process KPIs are as follows:

- A) Eastman’s policies have been revised to reflect the prohibited practices and remedies covered in the agreement.
- B) General and incident-based training is provided to workers and management, resulting in a well-rounded understanding of GBVH amongst those trained.
- C) The grievance mechanism functions well, enabling grievance resolution through bi-weekly meetings between the union and management and immediate redressal of grievances by SFMs.
- D) There is wide awareness of the agreements’ multi-channel grievance mechanism amongst the workers, who trust the system and see it as accessible and equitable. This is in part due to TTCU’s continuous and frequent engagement with workers in the factory and villages, as well as their proven track record of resolving workers’ problems, which has given workers the confidence to voice opinions and raise grievances.
- E) The ICCs have been integrated into the grievance mechanism and reinstated to work effectively in compliance with state laws.
- F) Eastman’s top management at the factories has been notably cooperative throughout the implementation of the agreement. We expand on these findings below, organizing our discussion around the KPIs.

Prohibited Practices and Available Remedies

The prohibited practices and available remedies are not included in this report but can be seen in Appendix A of the [year one report](#). These were integrated into Eastman’s policy named “*Workplace Sexual Harassment Prevention Policy, Guidelines and Complaints Redressal Procedure*”, resulting in an updated policy document issued in January 2024 covering Eastman’s Natchi Apparel Division. We noticed differences in the awareness of prohibited practices among the workers we interviewed. The ones selected by HR were those who had already received TTCU-led training under the agreement and exhibited a detailed understanding of prohibited practices, especially GBVH. For example, they mentioned “*[male supervisors] texting, commenting, staring or [managers] changing [workers’] workstations without justification*” as prohibited practices. The workers randomly selected by us had not yet received training⁴ and, consequently, exhibited a superficial understanding of prohibited practices and GBVH. For example, they mostly referred to their own behaviors, such as “*[not] wearing a hair cap*” and “*not talking to strangers*”. The key implication is that training, where provided, should be effective and needs to cover all workers. There is also a need to revisit training methodology to assess differences in the training approaches of the TTCU (which conducts training for all stakeholders) and that of the human rights organization CREA (which conducted training sessions for SFMs and ICCs in 2023 and is slated to conduct further training, including for both management and the TTCU in 2024-2025). It may also be advantageous to adopt workers’ suggestions, such as displaying posters with pictures of “Do’s and Don’ts behaviors” for both workers and supervisors.

⁴ Two of the workers randomly selected for the focus group discussions had 8 years of experience in the Natchi Apparel Factory, another had 4 years, another had 2 years, and one only 8 months. The latter, an SFM, was the only one who had undergone training, provided by the external organization CREA specifically for SFM’s.

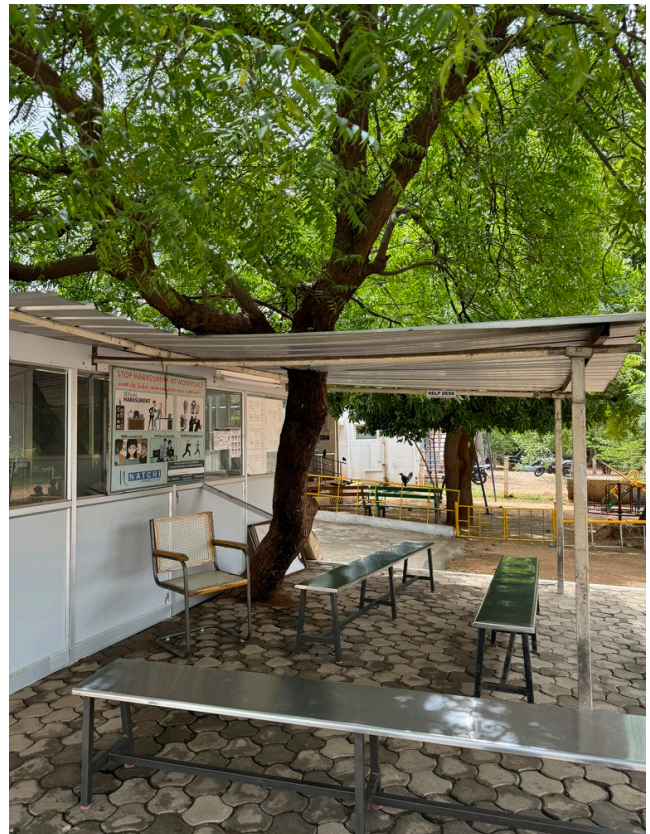
Grievance Mechanism

The multi-channel grievance mechanism of the agreement is visualized in the Appendix. Briefly, workers can report their grievances to SFMs on their production line, to members of TTCU, who visit the factory bi-weekly, and to the agreements' documentation officer, who usually accompanies the TTCU's factory visits. Workers can also raise GBVH-related problems directly to the ICCs. SFMs address a problem immediately on the shop floor or raise it to the TTCU. The TTCU either addresses complaints directly, discusses them with Eastman management, or forwards them to the ICCs.

Data provided by the program staff indicates regular union-management dialogue (a total of 105 meetings between the TTCU and Eastmans' HR manager) to discuss grievances and agreement implementation. These meetings take place both within the factory and outside its premises. We could correlate 84 meeting dates with the visitors' log book entries where the TTCU is logged as having entered the factory, indicating that the meetings took place within the factory premises. We also have minutes for 11 of the remaining 21 meetings.⁵ Our observation of one of these labor-management meetings suggests that they are congenial and informal, where formal recording of minutes does not seem to be common.

In contrast, grievances and their resolution are more diligently documented by the documentation officer in a well-structured case log. The case log provides insights into the wide range of problems, including a brief description of complaints and resolutions (each ~1-6 sentences), raised through the grievance mechanism and addressed through the union-management dialogue (see section "Outcomes").

The data indicates that there is widespread awareness among workers of the grievance mechanism. All workers, including those who were not trained, were aware of the grievance mechanism and the various access points. This awareness is due not only to the training received



but also to the information provided by the TTCU (in the factory and in the villages) or by their co-workers.

Interviews with workers indicate a high level of trust in the grievance mechanism. Workers express no hesitation in raising their grievances and believe that their grievances will be handled confidentially and without negative consequences. Workers highlight that the frequent and continual engagement of the TTCU with them, both at the factory and in the villages, has been instrumental in gaining their trust and eliminating their fear of reporting. Workers perceive the mechanism as accessible, as they can easily approach the TTCU "under the tree" – a space (pictured above) dedicated to the union, conveniently situated on factory premises where workers pass by during lunch breaks. Workers approach the TTCU not only to report grievances but also for casual conversation, as observed during our factory visits.

⁵ Shared copies of the handwritten, Tamil minutes called "General Union-Management meeting minutes" (GUM) and "Grievance redressal union-management meeting minutes" (GRUM) indicate minor inconsistencies. GRUM minutes (of 30 meetings) were not always in temporal order. A few dates were written front and back (e.g., 24.08 before 23.08 and then again 24.08), suggesting that they may have been written on the same day. GUM minutes discuss redressal of non-GBVH issues and do not include full dates (only month), and these are often not in order.

All workers interviewed were Tamil speaking, except for one woman who spoke Odia. Workers told us that Odia speakers can seek assistance from multi-lingual co-workers or communicate with an Odia-speaking SFM. Most workers mentioned that they see the grievance mechanism as equitable, with no discrimination based on caste, migration status, or other factors. They acknowledge receiving support in reporting prohibited practices from co-workers and SFMs who encourage and accompany them in raising grievances, as well as from the TTCU in addressing their grievances with management. Further, they find the agreements' documentation officer helpful, for instance, by assisting in writing down a complaint when they are uncomfortable doing so themselves. Several interviewed workers shared their experiences with using the grievance mechanism. The case study in Box 1, (in the grievant's words, lightly edited), is illustrative of how **workers become empowered** to raise grievances. Her description of events generally aligns with the grievance records.

The grievance mechanism is being continually updated in response to lessons learned from implementation. Better documentation has been introduced to track repeat cases involving the same harassers. The TTCU and program staff have learned to probe deeper into grievances as exhibited in a case where four women complained about problems with transportation and asked to travel on different buses. Deeper investigations revealed that the four women, who came from an upper caste, did not want to travel with women from a lower caste on the same bus.

Overall, the grievance mechanism is rights compatible, in that it has adopted the definition of GBVH as mentioned in Convention 190 and integrated the ICCs required under India's POSH Act.

BOX 1 CASE STUDY LAKSHMI

Towards the end of her workday, Lakshmi, (name changed to preserve anonymity) was asked by her immediate supervisor to step away from her production line because her machine wasn't working. The supervisor shouted at her, blaming her for causing problems. The next day, although the machine was fixed, she was replaced by another worker. Feeling humiliated, Lakshmi went outside and teared up outside the factory hall. After a while, thinking of union meetings in which Thivya, the leader of the TTCU, encouraged workers to be bold, Lakshmi found the courage to approach Thivya, who was visiting the factory that day. Thivya immediately called a meeting "under the tree" – a space within factory premises dedicated to the TTCU to engage with workers. The HR manager, the bespoke supervisor, another SFM, and the documentation officer of the Dindigul Agreement, who helped Lakshmi in writing down the complaint, attended the meeting. The supervisor admitted that the production line had frequent errors and that the machine still malfunctioned, even with a new operator. During the meeting, it became clear that the supervisor's superior, the line leader, had instructed him to replace Lakshmi instead of addressing the actual machine issue. The line leader also joined the meeting, but she refused to admit that she had given the instruction.

Lakshmi was asked how she wanted the issue resolved. Her immediate supervisor apologized. It was collectively decided by the group that the line leader would temporarily work as a sewing machine operator (SMO) for a week to re-learn how to empathize with the workers. (Line Leaders have often worked as SMO before being promoted to Line Leaders).

Lakshmi, for whom the meeting itself gave her the feeling that justice had been done was satisfied with the outcome. Her grievance was resolved in three hours. As an improvement, Lakshmi only suggests that apologies should be written rather than verbal to remind harassers not to repeat their mistakes. Lakshmi feels that the support of the TTCU and her role as an SFM gave her the strength and confidence to raise her complaint.

Role of the Shop Floor Monitors

The SFMs, who are workers appointed by the TTCU, play an essential role in the implementation of the grievance mechanism. They are recognized by management. They prevent the escalation of GBVH by intervening immediately when a problem occurs on the shop floor, or by informing the TTCU. For example, when a SFM witnesses supervisor raising his or her voice at a co-worker on their production line, she reminds the supervisor about the appropriate behavior in the workplace right there. Interviews and focus group discussions with workers signal that SFMs are confidently speaking up against mistreatment and are available and trusted to support workers in raising grievances. SFMs are easily recognized on the shop floor by their distinctively colored vests (yellow in the garment factory and red in the spinning mill) labeled 'shop floor monitor' on the back. There is roughly one SFM for every two production lines.⁶

In 2023, 88 SFMs were working in the garment factory and 10 in the spinning mill and the printing section, as shown in data shared by the HR department, representing a 59% increase in the number of SFMs compared to year one.⁷ All newly appointed SFMs receive orientation training. In 2023, a total of six training sessions were conducted for SFMs across different units, including training on their role as SFMs as well as training related to specific incidents (see Table 1 below).

Role of the Internal Complaints Committees

ICCs are required under India's Prevention of Sexual Harassment (POSH) Act to address complaints of sexual harassment. Yet, ICCs in textile factories have been commonly criticized for many reasons—such as workers not being aware of ICCs, ICC members being selected or intimidated by management, and not receiving the required training. In these factories also, the workers mentioned that before the agreement, the ICCs were non-functioning, and they were in fear of retaliation for reporting complaints.

Hence, an important requirement of the agreement was that the ICCs at the covered factories be reconstituted and integrated with the grievance system so that it could work more effectively in compliance with national and state regulations. The ICCs were reconstituted in 2023, and five ICCs currently exist, located in Natchi Unit I & II, Spinning Unit I & II, and printing). Per program staff data, each ICC is composed of two senior female managers (the same two are part of all ICCs), one external expert (also a member of all ICCs), and five worker members (4 female, 1 male), of which three are union members appointed by the TTCU. The [POSH Act](#) only requires that ICCs include one senior woman manager as a Chairperson plus one external expert and at least two employees and that 50% of the ICC must be female. The indicated ICC membership at the covered factories exceeds these minimum requirements.

Tamil Nadu guidelines for the POSH Act for the garment industry require that ICCs meet once every two months. Our check into the underlying data showed that the ICCs met only once in the first half of 2023, but the frequency increased during the second half, including some joint meetings to comply with the guideline of six meetings per ICC per year. Our reading of the ICC meeting minutes provides the impression that not all ICCs have yet established the full worker membership required--for the ICCs of spinning units I and II, only a total of 3-4 worker members (rather than 2x5=10) attended several joint ICC meetings.⁸

6 As indicated by program staff. Employee data shared by Eastman after our research visit shows that each SFM is responsible for 23 workers, (2274 workers and 98 SFMs).

7 SFMs per unit: 41 in Natchi I, 47 in Natchi II, 5 in Spinning I, 4 in Spinning II, 1 in Printing. Data was provided by Eastman post-field visit, thus, could not be verified onsite.

8 Program staff explained some worker members do not attend given that they may be on compensatory off days (for working on Sunday).

Two training sessions were held for ICC members, and management was also provided with an introduction to the ICC and POSH Act (see Table 1 below). The training sessions were conducted by the TTCU and the human rights organization CREA. The ICC worker and management members interviewed were knowledgeable about GBVH and their role in supporting workers. For example, the management member learned how to approach workers and receive complaints in a kind and non-judgemental way. The worker-member mentioned that in the ICC, she was treated equally to the representatives from management. She appreciates management's support of the ICC, as she can request time off for training or to discuss a case.

Our interviews with workers (who learn about ICCs from the notice boards, orientation meetings by HR, and from the TTCU) show that they are generally aware of the ICCs, and some felt that they could confide more in the re-constituted ICCs compared to the old ones. However, workers were able to identify only 2-3 (rather than 5) worker members of the ICC in their respective units. Thus, the interviews support the impression that worker membership (or worker awareness thereof) should be further strengthened to align with Eastmans' goal to have inclusive ICCs in all units.

Role of the Implementation Committee

The agreement mandated that an Implementation Committee be established to oversee its' implementation. Its composition, decided by consensus following the agreement's signing, included senior leadership from TTCU and Eastman management, and members of the AFWA⁹. This committee met on three occasions during 2023 to discuss progress, identify gaps in the implementation, and develop strategies to address these, as detailed in the meeting minutes. For example, there were discussions regarding common worker grievances, the decline in sourcing and threats to employment, and speculation regarding the potential chilling effect of a reduction in sourcing of a signatory brand on other brands.¹⁰

⁹ The specific representatives of Eastman, AFWA and the TTCU who attended the meetings varied over the different meetings.

¹⁰ The minutes contain these speculations, although we must note that the decisions of brands to reduce or stop sourcing are a function of many other variables.



Training

The agreement requires annual training for workers, supervisors, and managers. In year two, a total of 17 general trainings and 12 incident-based trainings were provided. Training was provided to workers, SFMs, line leaders, hostellers, (mid-level) management, the ICCs, and other staff. More details are provided in Table 1. The content of each of these trainings was tailored to the needs of the different attendees.

General training covers the agreement, including the definition of GBVH, FOA, prohibited practices, available remedies, and how to report and remediate violations, including GBVH. For SFMs and ICC members, the training goes beyond the universal content and reviews their roles and responsibilities, including bystander intervention and GBVH remediation. For hostellers, the training includes information on the functioning of various committees. For management, the training includes a 'sensitization' on the POSH Act and the ICC. Drivers received an orientation on new driver rules, which included not talking on the phone while driving, and most importantly, rules regarding their interactions with workers. Incident-based trainings were conducted following grievances and focused on some specific aspects, such as how to behave ethically towards workers and avoid verbal abuse as a line leader or clarification on the roles of SFMs for mid-level managers.

Table 1: Number of Training Sessions and Attendees Jan. – Dec. 2023¹¹

Stakeholder		Number of Trainings		Number of Total attendees*	
		General Training	Incident based Training	General Training	Incident based Training
Workers	Line Leaders	1	2	20 (21%)	61 (64%)
	SFMs	5	1	227 (100%)	43 (43%)
	Workers	1	3	100 (4%)	209 (9%)
	Hostellers	1	0	437 (79%)	0
Management	Management	1	0	30 (100%)	0
	Mid-Level Management	3	3	151 (95%)	76 (48%)
Other Staff	Drivers	1	2	40 (100%)	115 (100%)
	Hostel In charge	0	1	0	5 (100%)
	Canteen Employees	1	0	12 (48%)	0
ICCs	ICC Intro for Management	1	0	20 (71%)	0
	Member Training	2	0	34 (100%)	0
Total		17	12	1071	509

**The percentages reported are an imperfect estimates. They are calculated based on the number of employees attending training sessions divided by the number of persons in that employee category. The problem is that one employee can attend multiple training sessions.*

As described above, workers who underwent training (in 2023 or 2022) show a good understanding of GBVH, and SFMs and ICC members learned about how to support workers in their roles. One worker said that the training gave her the confidence to question her supervisors’ behaviour and speak up: **“Before the training when my supervisor asked me to do extra tasks and I refused, he used to scold me harshly or give me additional work. I used to think that he behaved like this because I made a mistake at work. In the training, I learned that this was a form of harassment and abuse of power. Now, if he retaliates against me without cause, I boldly confront him immediately.”**¹² In the third year of the agreement, additional training by CREA is scheduled for SFMs, management, and the TTCU. Additionally, “training of trainers” sessions will be conducted, where workers appointed by the TTCU will be trained on the GBVH topic to then educate their co-workers. As noted earlier, some reassessment of training methodologies used by TTCU and CREA will be useful to fine tune and enhance training effectiveness.

¹¹ As per data shared by program staff, which included attendee numbers, training descriptions, and photo evidence for all sessions except ICC trainings, which lacked photo evidence.

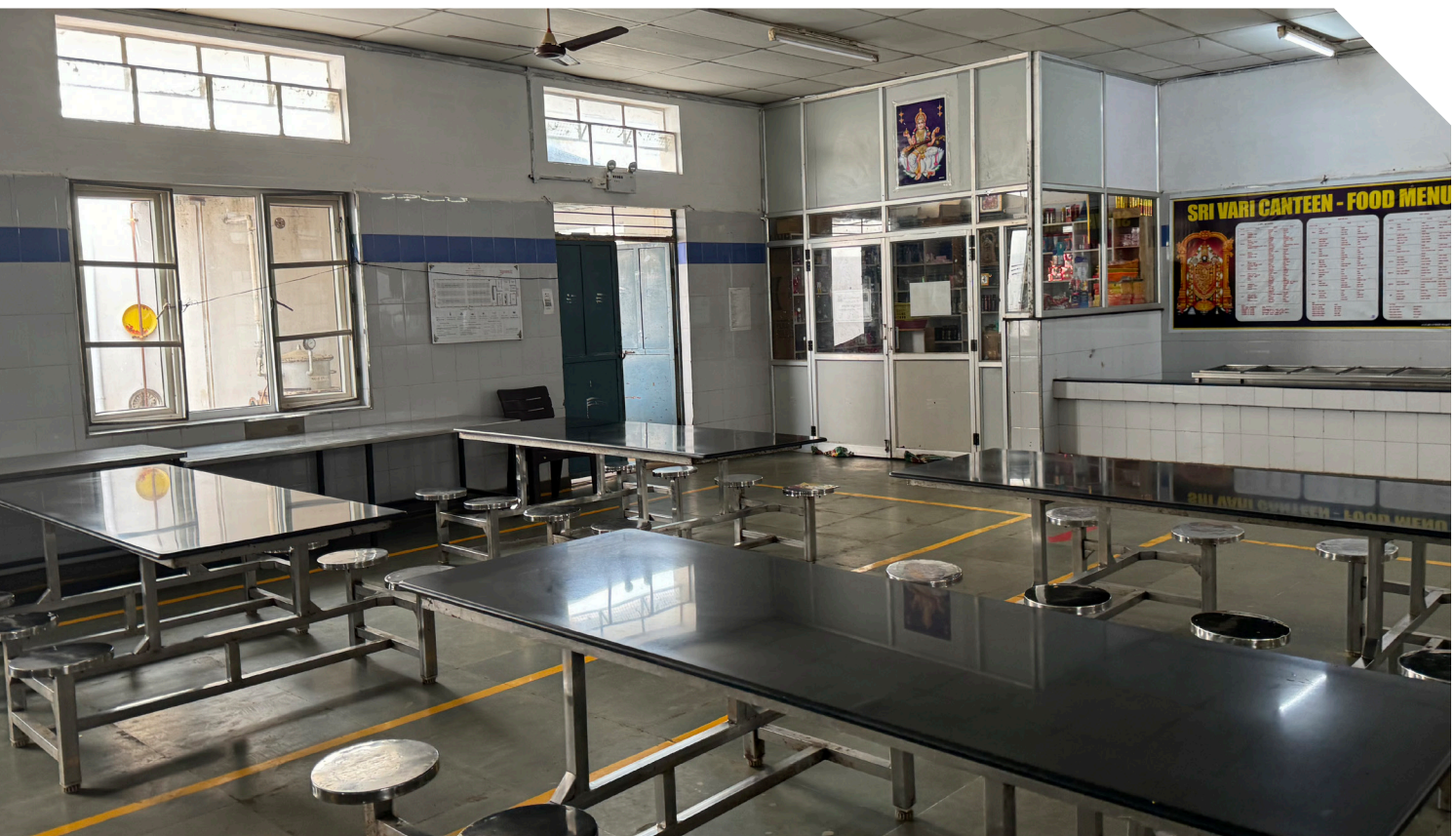
¹² The quote is paraphrased and edited lightly. The key issue here is that the supervisor often asked her to do extra work that was outside the scope of her normal duties and when she refused them, he would shout at her—she uses the word ‘scold harshly’. The training provided is based on C190 that includes verbal abuse as harassment.

Eastman's Cooperation

The agreement requires that Eastman management fully comply with its provisions. Our interviews with the TTCU and representatives from labor stakeholders emphasize that top management at the factories has been remarkably cooperative throughout the implementation of the agreement. Evidence of Eastman's cooperation is primarily seen through its willingness to meet with the union regularly, and the large majority of grievances that were resolved rapidly through the union-management dialogue, as detailed in the outcome section below. Eastman has also complied fully with remediation as directed by the ICCs. Per the text of the agreement, ICC cases can be escalated to the OC to reinforce compliance, but in 2023, no such escalation was necessary. During our assessment, Eastman management fully cooperated with the research team, granting access, volunteering data and helping the team to engage with management and workers.

Although Eastman's factory management demonstrates a strong commitment to the implementation of the agreement, it is not clear that all middle managers

understood all of its provisions, suggesting the need for more (or better) training. For example, there were three cases in which SFMs were asked to do work falling outside their SFM responsibilities. These cases were addressed by the TTCU with the respective supervisors and with training on the roles and responsibilities of SFMs for middle management. There were also a few cases of delay by middle managers in resolving grievances. For example, a worker complained that the scissors were not sharpened in June, and the TTCU advised to sharpen the scissors as soon as possible. As seen in the grievance data, ten days later, ***“on 04.07.23, the scissors were not sharpened so, TTCU reminded HR Manager to either sharpen them or replace them with new pair of scissors. On 05.07.2023 HR Manager called TTCU and said that order was given for weightless scissors. New pair of Scissors was given to the cutting department from Aug 1.”*** This example illustrates how the systems of the agreement ensure compliance by Eastman through continuous follow-up by the TTCU, even if there are delays in grievance redressal at the middle management level.



SECTION 2 OUTCOMES OF THE DINDIGUL AGREEMENT

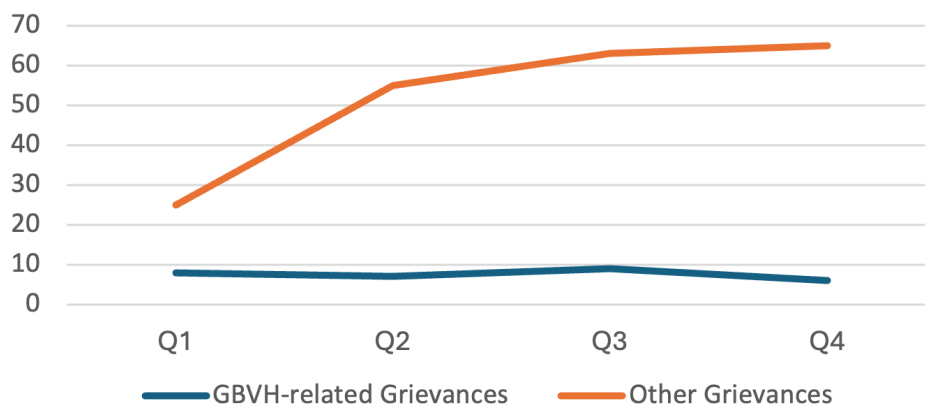
This section focuses on outcome indicators relevant to the goals of the agreement, excerpted here: *“Parties share the goal of preventing, remediating and eliminating gender-based violence and harassment as defined in ILO Convention 190 including GBVH at the intersection of gender and/or caste or migration status, as well as freedom of association violations that contribute to GBVH in the garment industry including in Tamil Nadu, India.”* (see Appendix A, [year one report](#)).

The key findings of section 2 of the report are as follows: a) Our analysis shows that workers trust the grievance system and have no fear to raise grievances, evidenced by the large number of grievances raised on multiple topics. b) The grievance mechanism appears to be remarkably effective, given the speed of grievance resolution. c) Notably, there were no grievances regarding violations of FOA. d) The TTCU functions as a powerful monitoring mechanism, ensuring effective remediation and preventing further violations. The mutual benefits of union-management dialogue are attested to by both the TTCU and Eastman Management. e) Healthy labor-management relations result in additional positive outcomes for workers. We expand on these points below.

Number of Grievances

Overall, a total of 242 grievances were raised in 2023. Of these, 30 concerned GBVH, while 212 related to a wide range of other issues. These numbers are significantly higher than the number of grievances raised in year one — GBVH grievances increased by 23%, while other grievances increased by 13%.¹³ GBVH grievances were evenly distributed throughout the year, while other grievances increased as the year progressed (see Figure 1). This data, corroborated by worker interviews, indicates that women workers gained trust in the grievance mechanism of the agreement and feel increasingly comfortable raising grievances on a wider range of issues than before.

Figure 1: Grievances received through the Grievance Mechanism per Quarter in 2023¹⁴

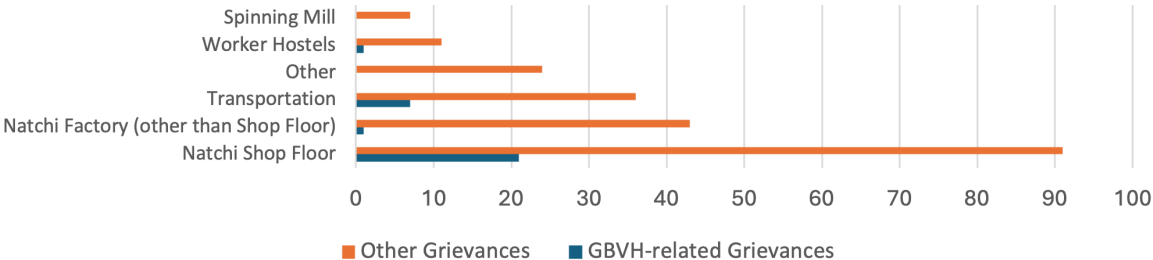


¹³ Note that year 1 data covers April – December (9 Months); year 2 data covers January – December (12 months).

¹⁴ 4 non-dated grievances are excluded.

Most cases are reported on the shop floor of the garment factory, Natchi, which employs most of the workers. Fewer grievances and no GBVH cases were reported in the spinning mill, according to the program staff, mainly due to its work environment. Workers operate large machines with minimal co-worker interaction, there are fewer male supervisors, and the loud machines leave less room for verbal abuse. Grievances related to the category “other” mostly concern workers’ personal problems at home or in the village. The analysis of grievance data highlights the interplay between life in the village, at home, and in the factory, emphasizing the importance of the TTCU’s work in both spheres. For example, a woman who is beaten by her husband at home may struggle to concentrate and meet production targets and face pressure from supervisors on the shop floor.

Figure 2: Number of Grievances per Location



Grievance Channels

The most preferred channel for workers to raise grievances was through the union. As Table 2 suggests, 67% of GBVH-related grievances and 91% of other grievances were reported to the TTCU. The preference for the TTCU channel is largely explained by the regular visits (twice weekly) of the TTCU to the factory, the TTCU’s interactions with the workers in their villages, and the TTCU’s proven track record of helping to solve workers’ problems. Workers also highlight that the TTCU listens to their problems and deals with them confidentially. In general, there is a high degree of trust in the TTCU among all workers interviewed.

Table 2: Grievance Channels Jan.-Dec. 2023

Grievance Channel	GBVH-related Grievances	Other Grievances
TTCU	20 (67%)	193 (91%)
Program Associate & Documentation Officer of the Agreement	2 (7%)	17 (8%)
ICC	2 (7%)	0
Management	6 (20%)	0
SFM	0	2 (1%)
Total	30	212

Additionally, workers reported GBVH-related cases directly to management, the agreements’ program staff, or, in three cases, directly to the ICC. It is important to note that the grievance data shared with us does not appear to appropriately represent the number of problems raised by workers to SFMs. SFMs usually resolve problems immediately on the shop floor. Hence, these problems are not necessarily recorded by the documentation officer. The actual number of

grievances raised through SFMs is likely much higher than two - the number presented in Table 2. For example, a worker testified that if an SFM sees a production line leader raising her voice at a worker, the SFM immediately steps in to warn the line leader that *“she is there to work, nothing else and that she is not superior to the worker in a sense that she can shout at her when they are both doing their job”*. Workers mention that SFMs on their production lines frequently intervened, which makes them feel supported and safer at work.

GBVH-related Grievances and Remedies

The agreement *“recognizes that an escalating ladder of GBVH is common to the textile and garment industries and that in order to prevent GBVH, it is important to prohibit and remediate all forms of GBVH to avoid escalation and mitigate harm. The agreement and program further recognizes that unremedied violations of national and international labor law outside the scope of Appendix A perpetuates a culture of impunity in the workplace and thereby contributes to GBVH”*, as specified in Appendix A of the [year one report](#). The agreement has developed different categories of violations and remedies.

The agreement differentiates between four categories of violations related to GBVH and FOA, along which the following analysis is structured. The categories include Repeated GBVH or retaliation for reporting or resisting GBVH; GBVH involving physical assault; GBVH not involving physical assault; and Violations of FOA.

Table 3: GBVH-related Grievances Jan.-Dec. 2023 by Category, Issue and Resolution¹⁵

Category	Issue	Reported	Resolved
1: Repeated GBVH or retaliation for reporting or resisting GBVH		0	0
2: GBVH involving physical assault	Unwanted touch	2	2
	Physical Violence	2	2
	Corporal Punishment	1	1
3: GBVH not involving physical assault	Verbal Abuse	17	17
	Rumors/Lies	3	3
	Sexual or gender-based comments	2	2
	Favoritism, Demand for private info	1	1
	Hostel Privacy or Freedom	1	1
	Surveillance/Privacy violation	1	1
4: Violations of FOA		0	0
Total		30	30

As Table 3 shows, a total of 30 GBVH-related grievances were reported in 2023, of which five involved physical assault (category 2), including corporal punishment and physical violence, for example, throwing a writing pad at a woman. The remaining grievances were non-physical (category 3). As in 2022, the most common grievances are non-physical and concern verbal abuse, for example, being shouted at and humiliated in front of others. The core problem in all grievances was resolved. The rapid resolution of most GBVH grievances within two weeks is commendable (see discussion on remedies and Figure 5 below). In one case, in addition to other remedies, the ICCs suggested a revision in Eastman’s code of conduct, which is pending.

¹⁵ The description of categories is adapted from Appendix A of the Dindigul Agreement. Analysis is based on categorization of grievances by Dindigul Agreements’ staff.

Repeated offenses by one harasser were brought to the attention of the TTCU over the course of four months. The grievances include verbal abuse by a cutting manager and favoritism of workers who behaved in a gendered submissive, obedient way. The remediation included a formal warning and relocation of the cutting manager, who resigned after the relocation. Counseling and training were provided to the workers.

Three cases related to GBVH indicate underlying discrimination against migrants. In one case, a migrant worker was scolded with “go back to Orissa”, the other complaint was about unnecessary scolding, and the third complaint was about migrant workers not being permitted to leave the hostel on weekends. The first case was resolved with a management relocation, a formal warning, and training, the second with a warning, and the third case with an education program about the freedom of movement for the person ‘in-charge’ of the hostel and 437 hostellers.

While there were no GBVH or FOA grievances related to caste discrimination, there were grievances about caste discrimination more generally (see section below on non-GBVH grievances).

Random checks and interviews, including with three grievants, were conducted during the field visit by the lead researcher, which helped confirm the overall reliability of the grievance data, along with our review of documents. For example, one GBVH-related complaint was by a woman who used waste garments cloth to sanitize herself to avoid blood stains from her menstruation during an emergency. She was scolded by her supervisor in front of others. The remedies suggested by the TTCU included storing napkins in the nurse room, which was adopted.

GBVH Remedies: In general, the agreement draws on a variety of sources, such as best practices by GBVH practitioners and international guidelines stemming from Convention 190, which provided the basis for developing remedies, which are classified into three distinct types. These include remedies that did something to immediately protect the worker from what had occurred



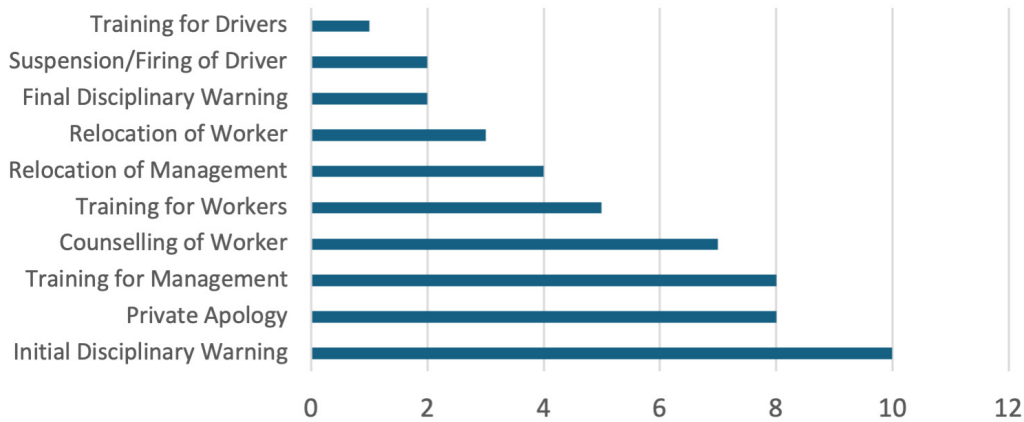
and assure the safety of affected workers, e.g., worker relocation to another unit; remedies that are rehabilitative and survivor-guided, resulting in a solution that makes the worker whole again, e.g., an apology by the harasser in front of the worker; and remedies that include a measure to prevent GBVH from happening again, e.g., training.¹⁶ See Appendix A of the [year one report](#) for details of these categories. In 2023, there were two remedies that did something to immediately protect the worker from what had occurred; 25 remedies that made the worker whole again; and 27 remedies that included a measure to prevent GBVH from happening again. Table 3 lists the common types of remedies.

The most common remedies provided are initial disciplinary warnings to perpetrators (including management, drivers, and other co-workers) and private apologies to workers. The types of remedies

¹⁶ The description of categories is adapted from Appendix A of the Dindigul Agreement. The examples are taken from the grievance data shared by program staff. The categorization of remedies is done by by program staff. For 5 out of 6 cases reported to management, the categorization was not provided in the shared data, thus we categorized them following the logic of the program staff’s categorisation.

range from one-to-one counseling of workers up to management relocation and suspension, indicating the power of the grievance mechanism to enforce remedies that create change. The process through which the remedy is provided often includes a joint conversation between the worker and the alleged harasser. In these meetings, an initial warning for the supervisor can be given, or the supervisor is asked to apologize. Workers report that this process itself, in which the alleged harasser is asked to explain and, if required, apologize in front of others, is an essential part of receiving justice, as illustrated in the case study reported in Box 1.1.

Figure 3: Frequency of Remedies for GBVH-related Grievances: Jan.- Dec. 2023¹⁷



Speed of Grievance Resolution: The mode and time frame of resolution of GBVH-related grievances showed some variation. As Figure 4 suggests, 73% of the grievances concerning GBVH were resolved through biweekly union-management meetings. 17% were resolved directly by management, and 10% through ICC. The frequent visits by the TTCU to the factory make it possible to address grievances swiftly. While most grievances were resolved within two weeks, 20% of the cases were resolved within one day.

Figure 4: Grievance Resolution Channel

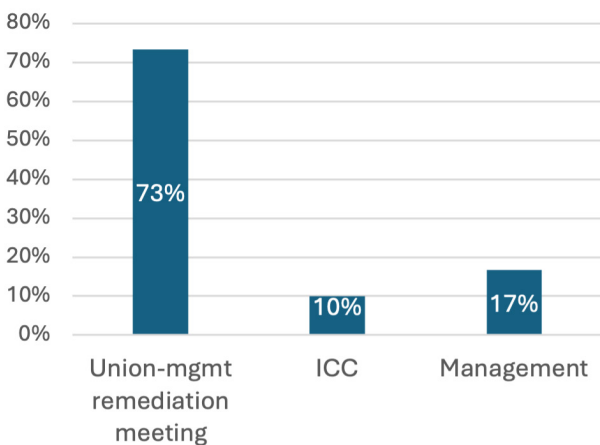
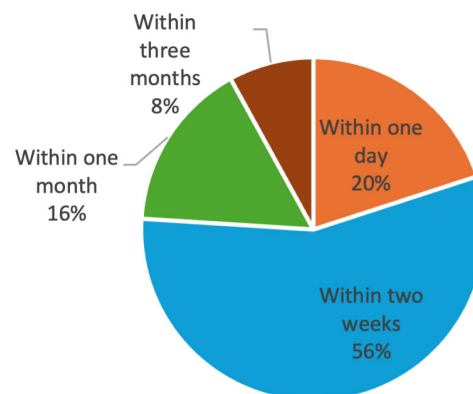


Figure 5: Remediation Period

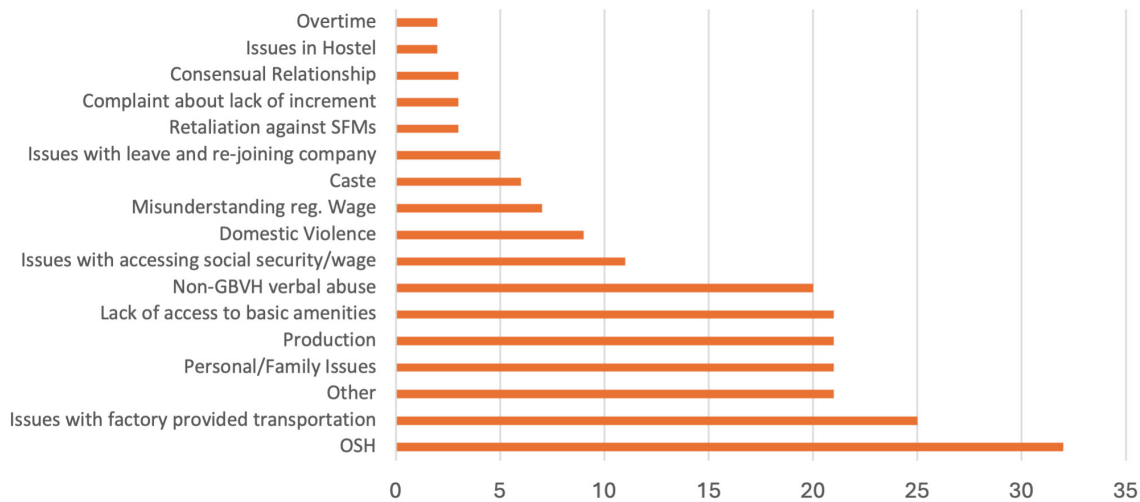


¹⁷ For one grievance, multiple remedies can be provided, e.g., worker counselling and private apology.

Other Grievances and Remedies

A large number of grievances that workers raise to the TTCU or SFMs are not GBVH or FOA-related. There were 212 total non-GBVH grievances during 2023, of which 86% percent were resolved. In the remaining 30 cases, the grievance data does not clearly provide information on whether the grievance has been resolved. For example, there are several cases where the resolution required advice to the management, but we do not know whether the advice was followed.

Figure 6: Types of Grievances Not related to FOA/GBVH Jan.-Dec. 2023



The most common non-related GBVH grievances are about occupational health and safety issues (OSH), such as eight cases of insufficient ventilation, as seen in Figure 6. Issues with factory-provided transportation include complaints about the driver not stopping as required or making additional stops for one worker, making other workers wait on the bus. Workers also frequently report personal and family-related problems to the TTCU, which often do not relate to the factory. These include loss of housing, domestic violence, and specific questions, such as how to obtain a birth certificate. The TTCU does not limit their work to the factory level but supports complainants in solving personal problems where possible. For example, the TTCU may help a woman who is being beaten by her husband by connecting her to a co-worker with space in her house to obtain temporary housing. In other cases, the TTCU directs the complaints to another point of contact, such as the Village Administrative Officer, to ask about the birth certificate.

The grievance data records five non-GBVH grievances that intersected with caste. One case involved a worker abusing a co-worker by using her caste name. Three cases concerned different instances of caste discrimination on the company-provided van transport. In one of these a worker raised a grievance that the van that usually picked her up at 7.00 am was now coming at 6.30 am. Upon investigation, it was discovered that the worker was not concerned about change in timing, but more concerned that she would have to share the van with three scheduled caste workers who were to be picked up from the neighbouring village after her pickup. The TTCU cautioned the worker about such discriminatory attitudes. Another caste related grievance concerned an issue outside the factory, in the village, where the worker and her family were not allowed to visit the temple for 20 years because her sister-in-law had an inter-caste marriage. The TTCU intervened in the village, and the worker is now able to worship at the temple.

Given the deep-rooted persistence of caste discrimination in social interaction in India generally, it is possible that other grievances, which do not present themselves as caste-related (and thus are not recorded as such), could be influenced

by caste identity. Some cases of verbal abuse may relate to caste identity, and might explain why supervisors or line leaders find it acceptable to raise their voices at certain workers but not others. An in-depth analysis of how caste intersects with grievances, including those related to GBVH, requires data on the caste of grievants and alleged harassers. Eastman does not collect or record caste data about any employee, and the grievants interviewed for this report were not asked about their caste.

Six non GBVH grievances involved migration status. For example, a few workers were marked as absent after returning from a one-month leave. This issue was resolved when it was discovered that the workers had not informed HR about the leave, leading to their reclassification as new employees upon return in line with the normal regulations.

Freedom of Association

Freedom of Association plays a key role in ensuring the prevention and resolution of GBVH grievances in this agreement. There were no grievances regarding violations of FOA. Our interviews indicate that FOA is unimpeded and that the TTCU is allowed to operate freely in the workplaces covered under the agreement. The TTCU generally visits the factory bi-weekly and regularly visits the villages where workers live, which is another important channel for workers to interact with the union. The TTCU's presence in the factory functions as an effective monitoring system, with direct access to workers, resulting in rapid grievance resolution.

During these biweekly visits to the factory (a total of 100 visits in 2023) and engagements in the villages, the TTCU frequently speaks to grievants or their co-workers to ask if their complaints have been resolved according to their expectations. These interactions happen intentionally, yet often informally, such as in a conversation during lunch break or when the TTCU visits the factory floor. For example, one worker complained about insufficient medicine. A month after resolving the case, the TTCU called upon random workers to check if there was sufficient medicine in the nurse room,

ensuring effective remediation. Along with the SFMs on production lines, the presence of the TTCU also acts as a deterrent to potential violators, thus preventing GBVH.

Union-management relations are cordial and healthy. As noted, the union and management meet regularly (105 meetings in 2023). Throughout our six-day visit to the factory, we observed that the interactions between the TTCU, an independent majority-Dalit trade union led by women, and Eastman management were conducted as equals, marked by mutual respect and oriented towards workers' wellbeing and productivity. Both parties acknowledge the benefit of the other, as described below.

The analysis of non-GBVH grievances reveals how the TTCU acts as a mediator between management and workers, contributing to a more cooperative and productive work environment.¹⁸ To illustrate, the grievance records contain seven cases in which workers complained about not receiving the wage that they expected. After discussing these complaints with management, the TTCU clarified with the respective complainants that there was a misunderstanding rather than a wage violation. For example, one worker expected



¹⁸ While the examples indicate productivity benefits, a detailed assessment of productivity gains was outside the scope of this report (i.e., not covered by OC-selected KPIs).

BOX 2

A LABOR-MANAGEMENT COLLABORATION EXAMPLE

The grievance records indicate that on 6th November 2023, a cutting manager complained to the TTCU that the “hourly target is 36 but only 13 is being achieved by the workers at cutting department.”

The grievance records detail that: “When TTCU enquired, the cutting leader mentioned that the necessary equipment like markers and rolls had been dispatched on time. However, the workers outlined several problems:

- 1) *The machinery frequently requires repairs,*
- 2) *cutting knives often blunt,*
- 3) *delays occur when decisions are needed for handling extra loads,*
- 4) *new workers are assigned without adequate training in cutting,*
- 5) *approval for mistakes in needle work takes time,*
- 6) *occasionally there is a shortage of materials,*
- 7) *problems arise with the variations in length and width of fabric,*
- 8) *women workers are expected to lift heavy loads, causing delays in loading and setting up.”*

The grievance record shows that consequently: “The cutting manager proposed appointing male workers for loading tasks.” When the TTCU followed up with the cutting manager, he assured them that, “the steps will be taken on the concerns raised by the workers. The loadman was appointed immediately. The next day, productivity improved. On 07.11.2023, the workers said that before the lunch interval they completed 3 lay but earlier it was 2 lay. (Lay is the preparatory process before cutting in which the fabric layers are spread).”

a higher salary when switching from the packing to the ironing department, but according to the Tamil Nadu Government Minimum wage regulations, the ironing and the packing department are allotted the same salary. TTCU’s intervention helped the workers understand the issue, and they continued working for Eastman rather than getting frustrated or quitting. Another example of labor-management collaboration can be found in Box 2 where a cutting manager uses the grievance mechanism to seek the TTCU’s help to understand why production targets were not being met in his department, and the TTCU’s response enabled the manager to institute corrective action and increase output.

Interviews with Eastman’s top management (Sr. VP, Quality Assurance and ESG, and the Human Resource Manager) confirm that they perceive the TTCU as a

helpful mediator. For instance, the HR Manager shared that when middle management reassigned a worker to a different production line for production reasons, workers often used to perceive this as targeted action against them. Now, when necessary, the HR manager asks TTCU for help in clarifying to the workers the legitimate reasons behind such reassignments, which helps prevent frustration and misunderstandings among the workers.

All workers interviewed mentioned that there is no differential treatment between union- and non-union workers by supervisors and managers in the factories.¹⁹ As the examples above indicate, the labor-management relationships appear cordial, with both parties attesting to mutual gains. This is particularly remarkable given that prior to the agreement, there was significant distrust of the trade union among lower and mid-management,

¹⁹ We did not ascertain the % of union-membership in the factories, as this was not covered under the KPIs selected by the OC.

women union members faced severe retaliation, and the TTCU was perceived as a threat to productivity and factory operations.

Additional Labor-Management Collaboration Outcomes

The respect for FOA and collaborative labor management relations has produced additional outcomes that illustrate the holistic nature of the agreement. For example, the TTCU and Eastman negotiated a wage increment for all workers in 2024, which Eastman management described to us as a positive outcome. Further, management agreed to discontinue the deduction from the salaries of hostellers for meals, as requested by workers. Many workers praised these tangible improvements. A key outcome can also be seen in Eastman's improved managerial practice in promoting over 100 women as production line leaders, compared to 38 in 2019. Interviews with workers revealed that the female line leaders make them feel safer, providing

a layer of protection between women workers and managers, who are mostly male. It also creates career opportunities for women. Further, union-management dialogue resulted in a new set of rules for bus drivers, grounded in workers' experiences with the transport providers and the AFWA GBVH-escalation ladder. For example, the new rules prohibit lending or borrowing money from workers and describe a procedure to ensure workers' safety when dropping them off at an unusual stop. The five drivers we interviewed showed a thorough understanding of these rules.

And finally, there are spillover effects of the Dindigul Agreement beyond the factory. Some women report that they take learnings from training and from the interactions with the TTCU to their homes. For example, one woman taught her niece to identify "good and bad touch" by people, especially men standing nearby on the bus, helping her understand GBVH as being a practice that women can and should consider unacceptable.²⁰



²⁰ We have paraphrased the workers original comments here to enhance clarity.

CONCLUSION

Overall, there is overwhelming evidence that the Dindigul Agreement is meeting the goals for which it was created. The processes instituted are working to create positive outcomes, that build upon year 1 results. FOA and collaborative labor-management relations as a key solution to GBVH is clearly demonstrated in the results, especially in the swift resolution of grievances. Workers trust the grievance system and do not fear retaliation for voicing various GBVH as well as non-GBVH issues. There is some scope for more improvement, to be sure. More workers need to be trained to enhance their understanding of GBVH as do more representatives of middle management, the ICCs need to be further strengthened, and some instances of inconsistent record-keeping need to be fixed. But these are small quibbles in an otherwise effective system of grievance resolution.

Despite this positive picture, there is reason for concern regarding the sustainability of the agreement, given the decline in employment consequent to the decline in sourcing. In May 2024, there were 2022 workers in the Natchi Apparel Division, compared to a high of 3071 in 2021²¹, when the Justice for Jeyasre campaign began. Interviews with management suggest that the garment factory is currently working at about 60% capacity. The signing of the agreement in April 2022 has not stemmed the declining tide of orders, and consequent shift reductions and layoffs. This is a source of worry for workers, many of whom are Dalit women who have to navigate layers of systemic caste-based oppression while often being the sole breadwinners for multiple family members. It is no surprise that virtually all the workers the research team spoke with expressed their concern regarding sourcing. Indeed, the most common question we heard was “will the brands come back?”.

Although it was beyond the scope of this year two assessment to consider sourcing issues (we were limited to examining data for the KPIs provided by the OC), it is vital to do so in future assessments. For example, how can these factories fit into the sourcing models of global brands? Such research is also necessary to address the more abstract question of whether there are positive rewards to suppliers for following ‘high-road’ labor and human rights practices.

The **replicability and scalability** of what is a **remarkable landmark agreement** to end GBVH and caste-based discrimination through robust FOA and collaborative labor-management relations is possible only if it can be demonstrated that these progressive practices result in more business. For that to happen, more brands should establish sourcing at Eastman’s Natchi facilities, and more brands should allow Eastman to place their orders in these factories. **In an era of mandatory due diligence where global brands need to reduce the risk of human rights violations, it may be advantageous for them to source from the rare factories in the apparel industry where the risk of FOA and GBVH violations is low.**

²¹ Data shared by Eastman.

APPENDIX

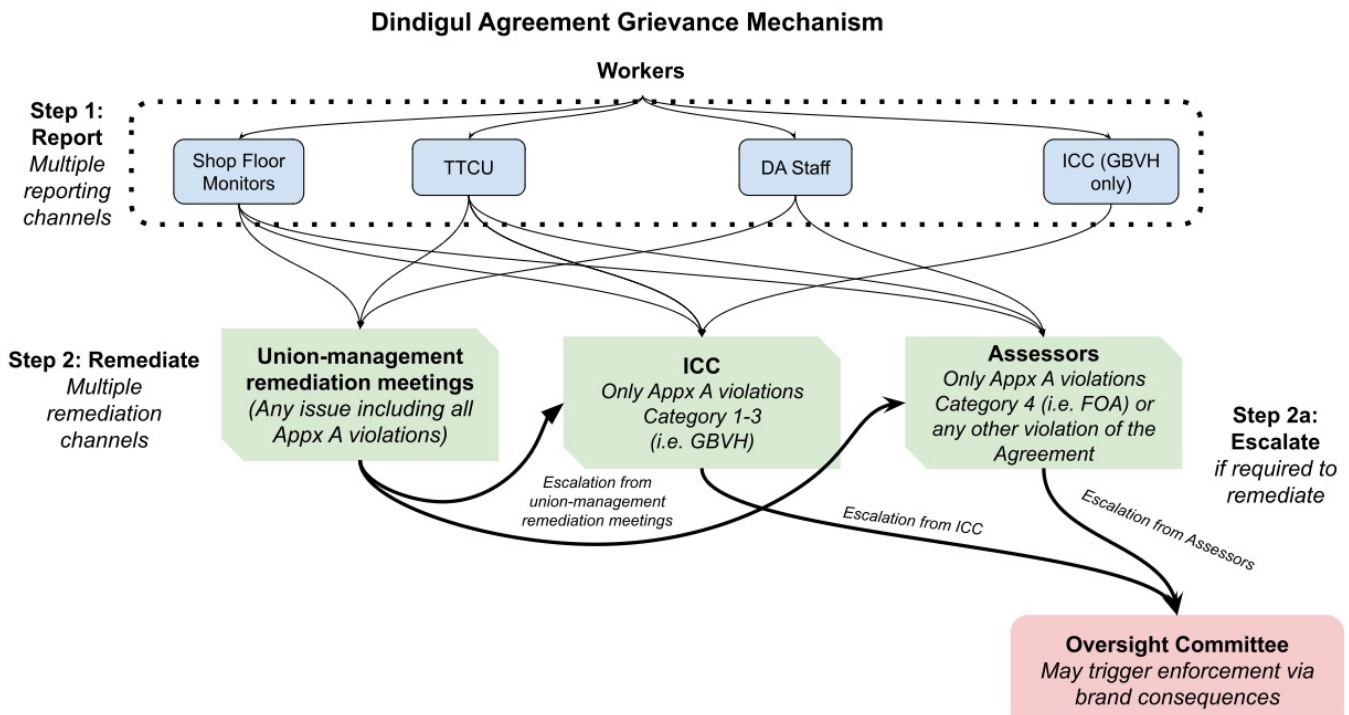
Fact Sheet: Grievance Handling under the Dindigul Agreement (From the Year 1 Report)

As in many contexts including unionized workplaces and other enforceable brand agreements (EBAs), the Dindigul Agreement runs a grievance procedure that is independent of management-run grievance procedures. This is a well-accepted practice that is consistent with the UN Guiding Principles on Business and Human Rights’ standards for remediation and grievance procedures and ILO best practices on grievance handling.²²

The Dindigul Agreement grievance structure, shown below takes an evidence-based best practice approach to grievance reporting for GBVH. For example, in their landmark 2016 study of workplace gender-based violence and harassment, the United States Equal Employment Opportunity Commission (EEOC) found that a single formal reporting option for GBVH often deters workers from reporting and included in its recommendations that:

*Employers should offer reporting procedures that are multi-faceted, offering a range of methods, multiple points-of-contact, and geographic and organizational diversity where possible, for an employee to report harassment.*²³

The Dindigul Agreement has incorporated this practice into its grievance mechanism, which offers a range of methods and multiple points-of-contact with geographic diversity — ability to report at work or outside work, for example, to TTCU.



22 https://www.ilo.org/wcmsp5/groups/public/---ed_protect/---protrav/---travail/documents/publication/wcms_622209.pdf

23 <https://www.eeoc.gov/select-task-force-study-harassment-workplace-report-co-chairs-chai-r-feldblum-victoria-lipnic>



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