

# ISPAHANI

## Gender Action Plan (GAP)

For

Expansion of Textile Spinning plant of Pahartali  
Textile Hosiery Mills (PTHM) Under BIFFL and  
KfW Fund



Pahartali Textile and Hosiery Mill



Ispahani Complex, north Pahartali  
region in the port city Chattogram.



Pahartali Textile Hosiery Mills (PTHM)

September 2025



**EcoCore Engineering Consultant (ECEC)**

Engineering Solutions for a Greener Tomorrow

Email: [eccdhaka@gmail.com](mailto:eccdhaka@gmail.com), Mobile: +8801516146359



## TABLE OF CONTENTS

Abbreviations .....	2
1 Introduction.....	3
2 Legal and Policy Framework on Gender .....	4
2.1 National Legal Framework of Bangladesh .....	4
2.1.1 Bangladesh Labour Act 2006 and Amendments (2013, 2018, 2023) .....	4
2.1.2 National Women’s Development Policy (2011) .....	4
2.1.3 Domestic Violence (Prevention and Protection) Act, 2010 .....	4
2.1.4 Women and Children Repression Prevention Act, 2000 (Amended 2003).....	4
2.1.5 Occupational Health and Safety Policy, 2013.....	5
2.2 International Legal and Policy Framework .....	5
2.2.1 World Bank Environmental and Social Standards (ESS).....	5
2.2.2 IFC Performance Standards.....	5
2.2.3 ILO Core Conventions.....	5
2.3 Gaps Between National and International Standards .....	6
3 Gender Action Plan .....	7
3.1 Country and Institutional Context .....	7
3.2 Institutional Capacity.....	7
3.3 Gender Action Plan.....	7

### List of Table

Table 2-1: Alignment of Laws with Project.....	6
Table 2-1: Gender Action Plan.....	8



## ABBREVIATIONS

CoC	: Code of Conduct
ESF	: Environmental and Social Framework
ESS	: Environmental and Social Standard
GBV	: Gender-based Violence
GM	: Grievance Mechanism
IA	: Implementing Agency
IEC	: Information, Education, and Communication
NGO	: Nongovernmental Organization
PMU	: Project Management Unit
PIU	: Project Implementation Unit
SEA	: Sexual Exploitation and Abuse
SH	: Sexual Harassment
SEP	: Stakeholder Engagement Plan



## 1 INTRODUCTION

The Expansion of the Textile Spinning Plant of Pahartali Textile Hosiery Mills (PTHM), located at the Ispahani Industrial Complex in Chattogram, was initiated to increase production capacity, modernize machinery, and enhance energy efficiency with financial support from the BIFFL and KfW. Following the completion of construction activities, the plant formally entered its full operational phase in early 2025. The expansion has transformed PTHM into a major industrial employer in the region, engaging approximately 1,983 direct employees and a significant number of contracted and supply chain workers. This workforce composition reflects the broader trends of the textile sector in Bangladesh, where women represent a considerable portion of production-line workers but remain underrepresented in technical, supervisory, and decision-making roles.

At the operational stage, gender equality is no longer an aspirational commitment but a day-to-day operational necessity. Integrating gender-responsive practices into recruitment, supervision, training, occupational health and safety (OHS), housing, and grievance redress systems ensures that women are not only present in the workforce but also empowered, protected, and offered opportunities for advancement. For a factory environment where women workers are often exposed to risks such as workplace harassment, unsafe housing facilities, wage inequality, and limited career mobility, a structured Gender Action Plan (GAP) is critical.

This operational GAP is designed to:

- Identify gender-specific risks and barriers within PTHM's workforce and operations.
- Outline institutional responsibilities for mainstreaming gender in all functions of the Project Implementation Unit (PIU), HR, and management systems.
- Provide practical interventions for improving women's safety, working conditions, and opportunities for leadership roles.
- Ensure that grievance redress mechanisms (GRM) are gender-sensitive, accessible, and confidential, enabling women to report issues without fear of retaliation.
- Align PTHM's practices with both national legal frameworks and international donor requirements.

This GAP aligns with:

- Bangladesh National Laws, including the Bangladesh Labour Act (2006, amended 2013, 2018, 2023) and the National Women's Development Policy (2011), which provide legal safeguards for women workers.
- World Bank Environmental and Social Standards (ESS), specifically:
  - ESS2 (Labour and Working Conditions): promoting fair treatment, equal opportunity, and prohibition of child and forced labour.
  - ESS4 (Community Health and Safety): addressing women's safety in worker housing, transportation, and surrounding communities.
  - ESS10 (Stakeholder Engagement and Information Disclosure): ensuring women's meaningful participation in consultations and disclosure processes.
- IFC Performance Standard 2 (Labour and Working Conditions): emphasizing worker welfare, equal opportunities, and safe worker accommodation.
- ILO Core Conventions (C100 Equal Remuneration, C111 Non-Discrimination, C190 Violence and Harassment), ratified by Bangladesh.

By integrating these frameworks into operations, the GAP seeks to position PTHM as a gender-responsive industry leader, ensuring compliance with donor safeguards while also enhancing productivity, worker satisfaction, and community trust.



## 2 LEGAL AND POLICY FRAMEWORK ON GENDER

### 2.1 National Legal Framework of Bangladesh

#### 2.1.1 Bangladesh Labour Act 2006 and Amendments (2013, 2018, 2023)

The Bangladesh Labour Act 2006, along with its subsequent amendments in 2013, 2018, and 2023, constitutes the central legislation governing employment relationships in the country. The Act consolidates provisions relating to wages, working hours, leave entitlements, occupational health and safety, maternity protection, and trade union rights. Specifically, the act guarantees equal wages for male and female workers engaged in similar work, prohibits the employment of children under 14 years, and restricts hazardous work for adolescents below 18. Maternity protection is a key feature of the Act, which provides 16 weeks of paid leave, split equally before and after childbirth.

For Pahartali Textile & Hosiery Mills (PTHM), the Labour Act is directly applicable in regulating contracts for its 1,983 workers, ensuring that wage payment is fair, leave policies are compliant, and occupational health and safety provisions are enforced.

#### 2.1.2 National Women's Development Policy (2011)

The National Women's Development Policy (NWDP) 2011 sets out a comprehensive government vision to eliminate gender discrimination and promote women's empowerment. It calls for women's equal participation in decision-making, access to property and resources, and protection from violence. It also emphasizes the need to integrate gender concerns into development planning and to promote women in leadership roles across all sectors.

For the PTHM project, this policy provides the foundation for creating gender-inclusive recruitment strategies and supporting women in supervisory and administrative positions within the mill. The GAP must translate policy principles into practical steps such as sex-disaggregated data collection, leadership training, and institutional safeguards against gender discrimination.

#### 2.1.3 Domestic Violence (Prevention and Protection) Act, 2010

This Act establishes legal protection for women against physical, mental, sexual, and economic abuse within domestic or institutional settings. While primarily aimed at family contexts, its scope extends to shared housing such as worker dormitories, which is relevant for PTHM's female employees. The Act provides for protection orders, residence orders, and enforcement mechanisms through local courts.

Within the operational context of PTHM, this law is significant because the company provides worker housing where harassment, intimidation, or violence may occur. Thus, policies to implement the Domestic Violence Act must be embedded into worker housing management systems, with strict enforcement of a zero-tolerance policy.

#### 2.1.4 Women and Children Repression Prevention Act, 2000 (Amended 2003)

This Act criminalizes sexual harassment, assault, abduction, dowry-related violence, and trafficking. It prescribes strict punishments for offenders and ensures the protection of survivors. For industries such as textiles, where women form a large proportion of the workforce, this Act provides the statutory basis for prosecuting workplace sexual harassment and exploitation.

PTHM must align its workplace code of conduct, grievance redress mechanism, and gender training modules with this Act to provide women with confidence that complaints will be taken seriously and perpetrators held accountable.



## 2.1.5 Occupational Health and Safety Policy, 2013

Bangladesh's OHS Policy outlines the obligations of employers to maintain safe workplaces, prevent hazards, and form safety committees with worker representation. It emphasizes the importance of training, emergency preparedness, and protective equipment.

For PTHM, compliance with this policy is vital to protect female workers from occupational hazards such as noise exposure, dust inhalation, and ergonomic strain, while ensuring that women have equal access to safety training and protective gear designed to their needs.

## 2.2 International Legal and Policy Framework

### 2.2.1 World Bank Environmental and Social Standards (ESS)

As the PTHM project is financed by BIFFL and KfW in alignment with World Bank standards, the following ESS are directly applicable:

- ESS2: Labour and Working Conditions requires fair treatment, non-discrimination, equal opportunities, prohibition of child and forced labor, and access to an effective grievance mechanism.
- ESS4: Community Health and Safety obliges the project to address risks related to worker housing, transportation, and surrounding community safety, with a focus on women's vulnerability.
- ESS10: Stakeholder Engagement and Information Disclosure requires inclusive consultations, particularly ensuring that women are meaningfully engaged and informed about project impacts.

### 2.2.2 IFC Performance Standards

The International Finance Corporation (IFC) Performance Standards are also relevant:

- PS1: Assessment and Management of Environmental and Social Risks and Impacts requires the establishment of an ESMS.
- PS2: Labour and Working Conditions emphasizes equal opportunity, fair treatment, and protections against workplace harassment, while extending requirements to contractors and supply chains.
- PS3: Resource Efficiency and Pollution Prevention indirectly supports gender outcomes by reducing community health burdens often carried by women.
- PS4: Community Health, Safety, and Security mandates measures to safeguard women and children in surrounding communities.
- PS6: Biodiversity Conservation and PS8: Cultural Heritage ensure that women's roles in community resource management and heritage are not undermined.

### 2.2.3 ILO Core Conventions

Bangladesh has ratified key ILO conventions relevant to gender:

- C100 Equal Remuneration Convention (1951) ensures equal pay for equal work.
- C111 Discrimination (Employment and Occupation) Convention (1958) prohibits discrimination in employment.
- C183 Maternity Protection Convention (2000) guides best practice in maternity benefits, though Bangladesh has not ratified it.
- C190 Violence and Harassment Convention (2019) addresses workplace harassment; Bangladesh has not ratified this but its provisions can be voluntarily adopted.



### 2.3 Gaps Between National and International Standards

Although Bangladesh has strong laws on paper, gaps exist in enforcement and scope compared to international standards. For example, while the Labour Act ensures maternity leave, it does not require employers to provide childcare facilities or flexible working hours, which are encouraged by IFC PS2. Similarly, Bangladesh has no workplace-specific GBV/SEA legislation, while ESS4 and ILO C190 require explicit workplace policies. Stakeholder engagement under national law is limited, whereas ESS10 mandates continuous, documented, and inclusive consultations.

To bridge these gaps, PTHM must adopt international best practices voluntarily, such as implementing gender-sensitive grievance mechanisms, providing childcare support, and conducting regular gender audits.

*Table 2-1: Alignment of Laws with Project*

Law/Standard	Description	Application to PTHM Operations
Bangladesh Labour Act 2006 (Amended)	Regulates wages, working hours, leave, safety, maternity	HR contracts updated; maternity benefits enforced; OHS committees formed
National Women’s Development Policy (2011)	Eliminates gender discrimination and promotes empowerment	Recruitment & promotion targets for women; gender training in HR
Domestic Violence Act 2010	Prevents physical, mental, economic abuse	Dormitory management policy aligned with Act
Women & Children Repression Prevention Act 2000	Criminalizes harassment, trafficking, exploitation	Zero tolerance SEA/SH in worker CoC and GRM
WB ESS2	Labour rights, non-discrimination, GRM	GAP and LMP operationalized with gender lens
IFC PS2	Equal opportunity, safe working conditions	Childcare, flexible shifts, supply chain due diligence
ILO C100 & C111	Equal pay, non-discrimination	Payroll audits and anti-discrimination policies



## 3 GENDER ACTION PLAN

### 3.1 Country and Institutional Context

Bangladesh is the world's second-largest exporter of ready-made garments (RMG) and textiles, with women comprising nearly 60–65% of the workforce. Despite this significant participation, gender inequalities remain entrenched:

- Occupational Segregation: Women are concentrated in low-paid, repetitive roles such as spinning, packaging, and sewing, while men dominate technical, supervisory, and managerial positions.
- Wage Gaps: Studies indicate women earn 20–30% less than men in similar roles, despite equal pay provisions in the Bangladesh Labour Act (2006, amended 2013, 2018, 2023).
- Workplace Barriers: Limited childcare, inadequate sanitation, poor dormitory conditions, and lack of safe transport restrict women's mobility and career progression.
- Harassment and GBV Risks: Surveys highlight persistent risks of sexual harassment, verbal abuse, and exploitation, both in workplaces and in dormitories.
- Weak Enforcement: Although the National Women's Development Policy (2011), the Domestic Violence Act (2010), and the Women and Children Repression Prevention Act (2000, amended 2003) provide legal safeguards, their enforcement within industrial zones is inconsistent.

### 3.2 Institutional Capacity

PTHM has established a Project Implementation Unit (PIU) to oversee Environmental and Social (E&S) compliance during operations. Specific institutional arrangements for gender mainstreaming include:

- Gender Focal Point in HR Department: Responsible for implementing GAP commitments, monitoring sex-disaggregated data, and liaising with external stakeholders (BIFFL/KfW).
- EHS & Social Team: Ensures occupational health and safety measures are gender-sensitive (e.g., provision of PPE for women, gender-appropriate risk assessments, separate sanitation).
- Worker Representation in Grievance Committees: Male and female worker representatives included in the Grievance Redress Committee (GRC) to ensure women's voices are heard.
- Capacity Building: Regular training for HR managers, supervisors, and line managers on gender equity, prevention of SEA/SH, and inclusive management.
- Community Relations Team: Conducts outreach with local communities to address cultural and social barriers to women's workforce participation.

Together, these arrangements ensure that gender issues are embedded in the Environmental and Social Management System (ESMS) and operational practices.

### 3.3 Gender Action Plan

The operational GAP is designed to embed gender equality into day-to-day mill management. Key commitments include:

- Gender-Inclusive Recruitment & Promotion – Policies ensure equal opportunity in hiring, training, and promotion, with special focus on technical and supervisory roles for women.
- Safe and Hygienic Facilities – Maintenance of separate sanitation, dormitories, lactation rooms, rest areas, and safe transport for female workers; childcare options explored.



- Strengthened Grievance Redress Mechanism (GRM) – Establishment of confidential, gender-sensitive pathways including female focal points and GBV-specific grievance handling.
- Awareness & Training Programs – Regular workshops on gender equality, SEA/SH prevention, respectful workplace behavior, and workers’ rights.
- Data Collection & Reporting – Quarterly reports with sex-disaggregated data on employment, training, promotions, and grievances submitted to BIFFL and KfW.
- Community Engagement – Awareness campaigns targeting local communities to reduce stigma against women in industrial roles and strengthen community acceptance.

The GAP will be finalized and operationalized by a designated Gender Specialist within the. It will be monitored through regular reporting. This Gender Action Plan (GAP) outlines specific actions aligned with key objectives to promote women's participation. Kindly see the table below

*Table 3-1: Gender Action Plan*

Objective	Actions	Responsibility	Timeline
<b>Policy-Level Interventions</b>			
Promote gender-inclusive hiring and workplace policies	a) Develop and implement gender-sensitive HR policies: equal pay for equal work, anti-harassment, flexible work hours. b) Ensure no employment of child labor and prohibit forced labor.	PTHM HR & Management	Ongoing from Year 1
Facilitate gender dialogue within the company	a) Conduct workshops and consultations with management, staff, and local NGOs to: b) Identify barriers to women’s employment in textile operations; c) Develop strategies to increase female participation in technical, production, and administrative roles.	PTHM HR & Gender Specialist	Within the first year
Build institutional gender capacity	a) Conduct training sessions for supervisors and staff on gender equity, workplace inclusion, and safe working conditions. b) Establish a gender focal point in HR for continuous support.	PTHM Management with Gender & Social Development Consultants	Throughout the project
<b>Program-Level Interventions</b>			
Ensure gender-responsive workplace design	a) Provide separate sanitation facilities, rest areas, and safe spaces for women workers. b) Implement safe transportation arrangements where needed.	PTHM Facility Management & HR	Throughout operation
Promote community awareness on women’s participation	a) Conduct awareness programs for local communities, male workers, and stakeholders to support women in industrial roles. b) Include sessions on reducing gender-based violence (GBV) in surrounding areas.	PTHM HR & Community Relations Team	Throughout project
Support training	a) Develop training modules for	PTHM HR with local	Modules



and upskilling of women	women in textile operations, quality control, machine maintenance, administration, and technical support. b) Include topics such as occupational safety, risk communication, and leadership.	training institutes & NGOs	finalized early; delivered continuously
Prevent exploitation and harassment	a) Establish workplace grievance mechanisms and reporting channels. b) Disseminate IEC materials warning against SEA/SH and labor exploitation.	PTHM HR & Gender Specialist	During operational phases
Build capacity to address safety concerns	a) Train supervisors and workers on SEA/SH awareness, referral pathways, and safe workplace practices. b) Implement monitoring and reporting systems.	PTHM HR & Gender Specialist with NGO support	Ongoing
Encourage female employment in project-related roles	a) Promote recruitment of women for production, technical, and administrative positions. b) Monitor sex-disaggregated data for recruitment, training, and promotions.	PTHM HR & Management	Ongoing
Address pandemic and health-related vulnerabilities	a) Conduct awareness sessions and distribute IEC materials on health, financial risk management, and workplace safety. b) Adapt training to digital platforms when in-person engagement is limited.	PTHM HR, Gender Specialist, and Occupational Health Team	As needed during emergencies