



The Dindigul Agreement to End Gender-based Violence and Harassment **HAS IT WORKED?**

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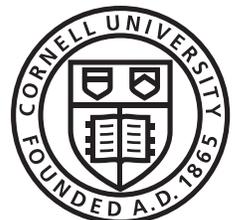


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INTRODUCTION

This report constitutes the “end-of term” evaluation of the Dindigul Agreement to End Gender-based Violence and Harassment (GBVH) at the factories of Natchi Apparel (P) Ltd. and the Eastman Spinning Mills (P) Ltd. in Dindigul, India. Widely known as the “Dindigul Agreement” (henceforth DA), it consists of four “interlocking” agreements. The first agreement is a *program agreement* between the Tamil Nadu Textile and Common Workers Union (TTCU) and Eastman Exports Global Clothing Private Limited in the city of Dindigul, Tamil Nadu. TTCU is a decade-old, independent, women-led, majority Dalit¹ union with 13,000 members that works on gender-based violence, wage theft, and caste-based discrimination in Tamil Nadu’s textile industry. Eastman Exports is a leading apparel manufacturer in India and is the owner of Natchi Apparel and Eastman spinning Mills in Dindigul. There are two witness signatories to the program agreement: Global Labor Justice (GLJ), a US-based NGO that supports workers and unions around the world in exercising their right to freedom of association; and Asia Floor Wage Alliance (AFWA), a Global South-based labor alliance led by trade unions across Asia’s garment production centers. TTCU, AFWA, and GLJ played a key role in the DA’s design and implementation.

Supporting the program agreement is a set of three individual agreements between three global brands—H&M Group, Gap Inc., and PVH Corporation and the labor stakeholders TTCU, AFWA, and GLJ. All agreements signed in April 2022 expired in March 2025, but the parties agreed to a no-cost extension until October 31, 2025. The program agreement is publicly available, while the individual agreements are strictly confidential. The Dindigul Agreement was the end-result of the year-long “Justice for Jeyasre” campaign by the TTCU, AFWA and GLJ after the rape and murder of

Jeyasri Kathiravel, a Dalit worker and TTCU union member at Natchi Apparel, by her supervisor in January 2021.

The labor stakeholders TTCU, AFWA and GLJ formally assessed the Dindigul Agreement for the April–December 2022 period, and their 117-page “Year One Progress Report” can be found [here](#). The program agreement required that “the Parties shall commission an expert agreed to by the Oversight Committee, to conduct a study and written report on the impact and replicability of the Program,” and so the DA’s Oversight Committee (OC)—comprising representatives of H&M, GAP Inc., AFWA, GLJ, Eastman Exports, and TTCU—commissioned two formal assessments. The first of these, a *limited* assessment at the end of the second year, covers the January 2023–December 2023 period and focuses primarily on assessing whether the data reported by the factory were reliable; it was centered around a set of key performance indicators (KPIs) developed by the OC. That limited assessment, undertaken by Cornell University Global Labor Institute (GLI) researchers Pauline Jerrentrup and myself, concluded that the underlying data were reliable and that there was “overwhelming evidence that DA is meeting the goals for which it was created,” while specifically highlighting the role of freedom of association (FOA) in addressing GBVH at the factories. That “Year Two Report” can be read [here](#).

Since the Year Two Report did not address replicability (a requirement of the program agreement), the OC decided that a final and *completely independent* evaluation regarding impact and replicability, *before* the agreement expires, should be carried out by GLI at Cornell, represented by myself. The OC agreed to cover partial costs of this evaluation.² The agreement specified that GLI would have complete discretion in designing the

1 The term “Dalit” means “oppressed,” “broken,” or “crushed” in the sense of losing one’s original identity. This name has been adopted by the people previously referred to as “Harijans” or “Untouchables.” Dalits were excluded from the fourfold [varna](#) of the caste hierarchy in Hinduism. In legal and constitutional terms, they are referred to as members of the “Scheduled Castes.” For Dalits, the term has come to symbolize for them a movement for change and for the eradication of the centuries-old oppression under the caste system. For more detail, see Jodhika (2001).

2 In the interest of full disclosure, we agreed on a payment of US\$25,000.00, which covered the expenses for international travel, research assistance, hotels in different cities, local transportation, and some time for a month-long evaluation phase. Research time and effort, meeting with the OC, report writing, and responding to suggestions and comments—which took two full months—was, by mutual agreement, uncompensated.



scope of the evaluation and carrying out the research and guaranteed access to relevant data and personnel. GLI agreed to share a rough draft report with the OC so its members could correct factual inaccuracies and make suggestions for improvement, but that the interpretation of the quantitative and qualitative data would remain GLI's responsibility. I am pleased to report that I received, and am grateful for, the exceptional cooperation from all relevant stakeholders during the research process. Their frankness is reflected in these pages.

An evaluation of the DA is crucial given that it is a (very) rare enactment of the principles enshrined in various international soft and hard law instruments: for example, the UN's 2015 Sustainable Development Goal (SDG) 5, which pertains to gender equality and the ending of discrimination and violence in public spheres; and SDG Goal 8, which requires the provision of safe and secure working environments. The DA is also consistent with the requirements of the UN Guiding Principles on Business and Human Rights and the OECD guidelines that are at the heart of various human rights due diligence laws (French, German, Norwegian, as well as the draft European Union law on Corporate Sustainability Due Diligence-CSDDD). The DA adopts the comprehensive definition of gender-based violence

and harassment (GBVH) outlined in International Labour Organization (ILO) Convention 190 (2019)—an international treaty that recognizes the universal right to a world of work free from violence and harassment, including gender-based violence and harassment.³ In addition, the focus of the DA on prohibiting violations of FOA is consistent with ILO Convention 87 (Freedom of Association) and Convention 98 (the right to organize and collective bargaining).⁴ Further, the DA is integrated with institutions required by India's Prevention of Sexual Harassment Act (POSH-2013). It is also consistent with the UN Convention on the Elimination of All Forms of Discrimination against Women (CEDAW 1979)—a binding treaty ratified by India in 1993.

An evaluation is also crucial given that many observers have highlighted DA's potential as a model for the prevention, remediation, and elimination of GBVH in supply chain factories worldwide. While programs that work well in one context may not provide the same results in others, it is important to highlight the institutions that work well and are worthy of replication, with contextual modifications, in other areas. Hence the focus on replication and scalability in the DA.

³ India has not ratified this convention as of September 2025.

⁴ Note that while the DA program agreement between the TTCU and Eastman Exports refers to FOA but does not mention collective bargaining, I demonstrate later in this report that the high levels of trust and collaboration between the TTCU and Eastman management, with quotidian interactions, is a case of collective bargaining in action.

RESEARCH QUESTIONS AND METHODOLOGY

Research Questions

Given the international interest in the DA and the claims in various reports and campaigns that it could be a model for the global apparel industry, this assessment report adopts a broad scope centered around four major research questions. The questions are consistent with my contract with the OC, which specifies “an independent scholarly assessment of the Dindigul Agreement—including replicability, scalability, and potential for contribution to GBVH prevention and remediation in the fashion industry”:

QUESTION 1:

Does the DA work? Is it successful in addressing GBVH in the factory by empowering women to use the grievance procedure? What are the benefits of the DA for workers and for the company? Although this question was partially addressed in the “Year Two Report,” this evaluation goes further to examine longitudinal data from April 2022–March 2025 and includes detailed interviews with all stakeholders as well as local experts and observers such as labor experts, journalists, and academicians in the region.

QUESTION 2:

If the DA *does* work, why? The focus of this question is to ascertain which institutions, policies, practices are most salient in delivering the results—a particularly important question given its relevance for the design of programs that aim to replicate DA or adopt some of the DA’s institutions and elements. The answers to Questions 1 and 2 above comprise the bulk of this report.

QUESTION 3:

Is the DA replicable? Required under the DA, this question is important because the DA has been highlighted as a potential model for eliminating GBVH in other workplaces (Saini, 2024). In fact, the global “Violence Out of Fashion” campaign⁵ that highlights the Safety Engagement for Women Workers (SEWW) Commitment Framework incorporates many of the institutions, policies and practices that led to the success of the DA.⁶ The question is also relevant given a consistent finding in prior industrial relations research that institutions and policies that work in one context may not provide the same results when attempted in other contexts. Hence, a more nuanced consideration of the factors germane to replication will be useful. This question also considers the cost of the DA.

QUESTION 4:

Is the DA scalable? The problem of GBVH is a global one, too large (and too urgent) for a factory-by-factory approach. This question thus asks whether it is possible to scale an agreement like this one to multiple factories at regional, industry, or national levels. My answers to this question, while speculative, are informed by the views of experts and prior research.

5 Initiated by the AFWA-Womens Leadership Committee, with the support of AFWA And GLJ.

6 <https://asia.floorwage.org/seww-commitment-framework>.

Methodology

A key methodological issue in studying the functioning of the DA is that its signatory stakeholders are the primary ones with knowledge of how the agreement came about and how it is functioning. Consequently, the research process required accessing stakeholder reconstructions and narratives of the DA's origins and their roles and centrality in the DA's functioning. Hence, the process first involved interviews with all signatory stakeholders. I interviewed representatives of the three signatory brands (PVH Corp, Gap Inc., and H&M), the labor stakeholders (GLJ, AFWA, TTCU), and management representatives of Eastman Exports. I also interviewed DA program staff, management members, members of the Implementation Committee (IC) and Internal Complaints Committees (ICCs), the independent assessors of the ICCs, the counselors, and different samples of workers in the factory, including worker shop floor monitors.⁷ I examined documents and data provided by DA program staff, Eastman Exports, and TTCU. I also consulted widely with experts, journalists, other NGOs active in the apparel industry, and leaders of other GBVH initiatives. Appendix 1 lists the stakeholders and non-stakeholders (other than workers) interviewed.⁸

Interviews with *non-workers* were conducted either in-person on various dates beginning May 7 and ending on June 17, 2025, or by phone after June 17. Each interview lasted at least one hour, and many lasted several hours. While the interviews were not recorded, extensive notes were taken. Most interviews were in English or Tamil. They were unstructured and open-ended, employing a naturalist interviewing approach and informal conversational style to access the perspective of the interviewee (Patton 1990). As Patton notes, this method relies entirely on the "spontaneous generation of questions in the natural flow of an interaction" (Patton 1990, p. 280). I supplemented the informal conversational style with a very general interview guide from which

I raised topics such as the DA's origin, the roles and contributions of different actors, how institutions have worked, and the possibilities for replication and scalability. Not all respondents addressed every topic exhaustively, and some did not address various topics at all.

To interview *workers* who have experienced the DA, I recruited two researchers who functioned as translators and co-investigators: Silvia SV, a Tamil speaker (local workers interviewed were all Tamil speakers) and Sweta Dash, an Odiya and Hindi speaker (most of the migrant workers interviewed spoke Odia; a few from Jharkhand spoke Hindi).⁹ Both researchers underwent training on qualitative research and data quality, conducted by a Cornell expert via Zoom.

We created a *purposive* (Lincoln and Guba 1985) sample of workers to interview to assess their knowledge and understanding of the agreement of the DA and GBVH, their experiences with how grievances have been handled under the DA, their experience as ICC members and /or shop-floor monitors, and whether the DA has resulted in some degree of empowerment for them. We first interviewed 15 workers to assess general awareness of the DA and its GBVH provisions. Although a purely random sample from factory records would have been one way to choose workers, we had been advised that some workers might not be willing to speak, and so DA program staff sought volunteers on our behalf in the different factory units.¹⁰ The research team had toured these various factory units on two occasions, so most workers were aware of who we were and our purpose.

Many workers volunteered. The list was pared down to 15 Tamil-speaking workers (given our timeframe) who had *not* faced any problems and had never raised grievances. We assumed that workers who had raised grievances would be more aware of the DA, and

7 I use the term "shop-floor monitors" (SFMs) in this report because that is how most stakeholders referred to these workers. I am reminded, however, that the labor stakeholders prefer to use the term Worker Shop Floor Monitor (WSFM) to emphasize that this is an institution that is, and should be, chosen by workers and be independent from management.

8 Note that at the end of the research period, all original notes of the researchers were also submitted to Cornell University.

9 Silvia is currently pursuing her doctorate on the topic of child sexual abuse and has worked at the Institute of Social Education in Chennai as a psychologist. Shweta has done extensive research on sexual and reproductive health and is the author of several publications on gender-related research, among others; she is currently employed as a research fellow with the George Institute of Global Health in Bengaluru.

10 Note that the use of "we" and "our" in this report refers to Silvia, Shweta, and myself.

our purpose was to examine awareness among the workforce generally. These 15 were organized into 4 groups for group interviews, on-site and in Tamil, that lasted 45 minutes to an hour. Interviews were also held with 8 migrant workers in three groups; these interviews were done offsite, at the hostel where they lived, and were conducted in Odiya and Hindi.

Our second purposive sample was drawn from survivors of GBVH. TTCU invited workers who had raised GBVH grievances to participate in the interview process; 7 survivors volunteered. These workers were interviewed individually by the research team, with a psychologist present. We also interviewed a driver employed by Eastman and two contract drivers, given that many grievances, both GBVH and others, related to transportation. Next we interviewed 5 randomly chosen shop-floor monitors (SFMs) who we expected to exhibit a higher awareness of GBVH and worker rights issues than other worker interviewees given their leadership positions and the more extensive training that they received. Finally, we interviewed 7 worker members of the Internal Complaints Committee (ICC) of the Natchi Apparel unit, after having met with the external independent assessors and the management member of the Natchi Apparel unit separately to ensure that workers were free to speak freely. We also interviewed the newly appointed ICC chair at the spinning unit. While DA program staff brought all worker interviewees to the conference room provided for the interviewees, they did not come inside.

Following best practice when trying to obtain information about sensitive issues such as GBVH and FOA, we complemented our on-site interviews with discussions with workers in safe, off-site spaces. One evening, we held a community meeting in the Guruvappanayakkanur village, selected randomly from four villages suggested by the TTCU, with about 30 women workers. They were mostly Dalit workers, but some were members of Gounder and Naicker communities.¹¹

Beyond these interviews as sources of data, we obtained access to a range of original documents such as log books, grievance records, ICC and IC meeting minutes, and data on training and counselling. DA

program staff provided summaries of documents in Tamil, and I checked carefully to ensure that details in those original records match the numbers. Quotations from the interviews throughout this report are *original*, use interviewee terms and language, and illustrate how interviewees are experiencing the DA. Readers may wonder why a report focused primarily on impact, replication and scalability also discusses the history and origins of the DA, but I have included those for educative purposes, as I expect readership for a wide audience that may not know much about this very innovative agreement.

There were two methodological challenges in the writing this report. The first was that the reconstructions of events and the description of the centrality of their roles in the process of establishing and institutionalizing the DA often differed from stakeholder to stakeholder. Some privileged their narratives over others, and many expressed concern about how they have been portrayed in this report. These issues were reflected in the extensive feedback I received on the first and second drafts. I have tried to walk a fine line between ensuring fair representation of all stakeholders' views about their own roles and reconciling their different positions, arguments, and preferred narratives on issues. I relied on what I found through my research to decide between conflicting narratives. The results of this effort will certainly not please everyone.

The second challenge relates to confidentiality. I was not provided with access to the confidential brand agreements, nor was I provided with any financial data with respect to the DA's expenditures, which made it impossible to answer the question of what the DA costs.

The process the OC agreed to was that feedback on my first draft from different stakeholders would be sent to me directly by each of them on a strictly confidential basis, which made it impossible to reconcile feedback from multiple stakeholders through a collective, participatory process. That process changed slightly with respect to feedback on the second draft, where I did receive some collective feedback based on OC discussions, as well as individual feedback from stakeholders.

¹¹ Both Gounder and Naicker communities are classified as members of OBCs (Other Backward Classes), higher in the caste hierarchy in India relative to Dalits, but lower in the hierarchy than the three major "forward" classes.

Definition of GBVH

It is important to recognize that the DA's designers use the definition of GBVH established in ILO Convention C190 (2019) and ILO Recommendation 206 (2019).¹² As defined, GBVH encompasses physical, sexual, psychological, or economic harm that includes any unacceptable behaviors such as verbal abuse. ILO C190 defines the "world of work" to include both public and private spaces where workers are paid; take breaks; utilize facilities during work; engage in work-related trips, events or social activities; use technology-enabled communications; occupy employer provided

In addition, ILO C190 recognizes the fluidity of violence—the preamble to the Convention notes that "domestic violence can affect employment, productivity and health and safety, and that governments, employers' and workers' organizations and labour market institutions can help, as part of other measures, to recognize, respond to and address the impacts of domestic violence." Finally, R206 requires actors to mitigate the impact of domestic violence in the world of work.



¹² According to ILO Convention 190, Article 1 (b), GBVH includes "violence and harassment directed at persons because of their sex or gender, or affecting persons of a particular sex or gender disproportionately and includes sexual harassment."

QUESTION 1:

DOES THE DINDIGUL AGREEMENT WORK?

In this section, I assess whether the DA works—that is, whether it is meeting the goals for which it was designed. Is it successfully addressing GBVH in the factory by empowering women to use the grievance procedure? What are the benefits of the DA for workers and the company?

To make this determination, I have marshalled a wide range of quantitative and qualitative evidence—such as training activity, workers awareness of GBVH issues, use of the grievance procedure, how grievances have changed over time, the state of FOA in the factory, qualitative evidence of changes in workers knowledge, attitudes and degree of empowerment, data on employment absenteeism and turnover, and evidence from interviews regarding sourcing patterns and factory utilization.

1. Training

Training is key to addressing GBVH. The DA requires annual training for workers and management. Consistent with the definition of the world of work in Article 3 of ILO Convention 190, the scope of training at DA is quite inclusive, covering not only management and workers, but also all others who intersect with workers, such as drivers, canteen employees, and hostel wardens. Training topics are comprehensive and include general orientation to the DA, GBVH and prohibited practices, reporting and remediating GBVH violations, the requirements of the Indian POSH (Prevention of Sexual Harassment Act, 2013), workers' rights, caste discrimination, and ethical behavior. There are also training programs tailored to the specific needs of groups such as shop floor monitors, ICC members, drivers, hostel wardens, and canteen employees.

Training has been provided by several organizations. In the DA's first year (April–December 2022), the labor stakeholders provided DA orientation training for members of the ICC. TTCU had begun training workers and drivers earlier, and its training programs focus on orienting workers to the DA and on GBVH broadly defined, including domestic violence, gendered bullying, legal rights and consent for general workers. Two external training providers, CREA and Vaanam Group, have provided advanced training in partnership with TTCU, for shop-floor monitors, management staff, and migrant workers in the hostels. Vaanam Group's training program covers a broad range of issues, including

GBVH at the workplace, gender bullying, moral policing, consent, sexuality, legal rights, and domestic violence. Both TTCU and Vaanam Group also conduct bi-monthly mini-sessions for top- and middle management, worker shop-floor monitors, and ICC members. And TTCU sends survivors of domestic violence to Vaanam group for advanced support and counseling.

Table 1 details the number of training programs (the top number) and the number of attendees for each program (the number in parentheses).



Training in action.

Table 1: Training Coverage, By Year, Topic and Audience

Topic	Training Topics	YEAR 1	YEAR 2	YEAR 3
		June 2022-December 2022	January 2023-December 2023	January 2024-March 2025
		Number of Programs, (Number of Participants)	Number of Programs, (Number of Participants)	Number of Programs, (Number of Participants)
SFMs	DA, roles of SFMs, GBVH & FOA violations, preventing and remediation protocols, POSH Act	28 (58)	3 (88)	8 (88)
ICC members	Orientation on DA, POSH Act, Survivor led approach to GBVH,	3 (35)	3 (27)	12 (37)
General Orientation Training on DA for all Employees (including Refresher Training)	Content of DA, Workers rights, GBVH, FOA, Mobility, caste-based discrimination	80 (2171)	9 (2274)	12 (2800)
Incident-Based Training for all employees*				10 (233)
Middle Management Training	Anti-GBVH, POSH Act Ethical Behavior		7 (257)	8 (181)
Top Management Training	DA, GBVH Prevention & Remediation Protocols			3 (28)
Contract Drivers	Ethical behavior towards workers, rules and responsibilities, code of conduct for driver		3 (70)	8 (64)
Other Categories (Hostel In-Charge, Canteen Staff)	Incident based training and orientation on food safety and hygiene		5 (12)	
Total Programs		111	30	61

Note: Attendees included workers in apparel, spinning and embroidery units.

*Incident Based Training programs were separated out in 2024-25, but earlier included with general worker training.

The data presented in Table 1 suggest that a training program is conducted every week, on average (61 training programs in the 15-month period from January 2024 to March 2025). This is almost double the number conducted during the 2023 calendar year. The number of programs across years are not strictly comparable, as comprehensive training data were not collected in Year 1 because the program staff was recruited quite late in that year, and the counting methodology differed. But there is a clear intensification of training from Year 2 to Year 3, despite no significant growth in the workforce from 2023 to now.

A major problem in the training data collection is that the percentage of the general workforce covered by each training program is not always clear. The data in Table 1 show the number of workers who attended the training, and many attended training on multiple occasions. In the case of smaller groups such as SFMs, ICC members, management staff, drivers, canteen staff, and hostel wardens, the training has covered 95% of each group. Our interviews with migrant workers indicated lower coverage among that group, despite the fact that Vaanam Group and TTCU have organized special training sessions for them in the hostels, including mini-meetings on GBVH. The low coverage found through our interviews may be explained by turnover of among migrant workers.

The fact that the majority of programs on the DA and GBVH for general workers are done by the TTCU may explain why workers primarily raise GBVH grievances with the TTCU (discussed below). In our interviews with workers, workers spoke highly of the utility of the TTCU and Vaanam Group training. In fact, grievances from the spinning mill in particular have increased since Vaanam Group training was introduced in April 2024, along with the recruitment of a Documentation officer for the spinning mill (a former Natchi worker and union member).

Counseling is an integral element of the DA's design and a key remediation measure. It is included in the DA budget, but did not commence with the agreement due to the difficulty of finding good counselors, especially in the local area. Counseling is designed to complement training to catalyze women to take action both at home and at the workplace. Exposure to training has increased the demand for counseling. Both TTCU and Human

Resources send workers for counseling believed to be facing personal issues affecting their productivity or workplace behavior. Even more importantly, women workers have requested counseling covering a wide range of issues at the workplace (e.g., workplace bullying, verbal harassment, ethical conduct, issues around sexuality, and sexual expression seen as deviant) and domestic violence.

Since April 2024, the two Vaanam counselors have conducted 64 counseling sessions for workers, mostly from Natchi and the spinning units. These have ranged in duration from 30 to 120 minutes (60 minutes on average). These counselors visit the factory about once a month approximately. We learned in interviews with the two counselors that in addition to these formal sessions they are also providing counseling by telephone, sometimes even in the middle of the night, particularly in cases of domestic violence.

2. Awareness of GBVH and Workers Rights

The hypothesis implicit in DA's design is that training results in greater awareness of GBVH among most employees. The Year 2 report documented a high level of awareness of GBVH among interviewed workers and top management, but noted that middle management might require additional training. Our qualitative findings this year suggest that middle management is equally aware of GBVH, but that migrant workers have not all been exposed to training activities.

As a result of the POSH act, workers at Eastman had been trained about sexual harassment since 2017, but many considered that training to be quite vague. Workers we interviewed consider the training since the DA to have become more comprehensive, with better content, improved delivery through communications and posters, post-training counseling, and regular conversations about GBVH. Worker interviews revealed the particular value of incident-based training (the data for which was separated out in Year 3). According to workers, GBVH training helps them identify the GBVH issues that shouldn't have to be tolerated at any cost at *both* work and home, whereas beforehand they might have experienced this kind of abuse at both work and home without even recognizing it for what it is and

knowing that it is wrong. Workers interviewed were able to identify sexual harassment and discrimination in different situations and scenarios, and provided examples such as supervisors allotting less work to selected women, inappropriate touch, providing extra snacks, and other such instances. One ICC member recounted that a man offered her husband (not an Eastman employee or connected with Eastman in any way) money to have sex with her. She broke down as she explained that it was the GBVH training and conversations that helped her realize that was wrong and actually constituted domestic violence.

A different worker testified to an increased understanding of sexual harassment noting that now she understood that “any favor asked by employer without girl’s consent is sexual harassments and even unhealthy looking (staring) itself is harassment.” Another worker highlighted that “*Paliyal vanmurai enaennaneenakku rhomba nallave therium*” meaning “I know what sexual harassment is very well.” Yet another worker stated, “After attending the training, I now understand that even looking in inappropriate ways is itself sexual harassment.” Another worker told us, “I slapped the man who misbehaved with me on public transport, and I had never acted like that before.”

The migrant workers (who we interviewed off-site), by contrast, did not seem to have an improved understanding of GBVH, excepting two who were SFMs and members of the ICCs. These women said they had never attended any GBVH training or seen any material on the subject. One said that “it has always felt safe

here because it is just women.” Another vaguely recalled attending a GBVH training session three years earlier, but that it was only partially translated from Tamil to Odia and Hindi. Yet another migrant worker further added that her family feels safer about her being so far away from home to work in this factory because her co-workers are women.

Migrant workers who were SFMs or members of the ICC had a higher level of awareness. One SFM highlighted that her understanding of GBVH now also includes “discrimination” on the basis of caste, religion, and ethnicity, adding, “Language based discrimination is also part of all this, no?” A migrant worker who was an ICC member said, “It was during these trainings that I had several eye-opening moments. I knew all the catcalling and many other experiences I had had were wrong, but I could never put a pin on it. I did not have the language for it. And then I realized what had happened to me so often was also GBVH!”

A counselor noted that migrant workers were generally more likely to call out instances of sexual harassment than local workers.

In general, training has enhanced awareness of the both the DA and GBVH among most local workers. Prior research (Feldblum and Lipnic 2016) has shown that even if awareness is high, though, women will hesitate to raise grievances if they fear retaliation. The next section examines whether women are actually raising grievances under the DA.



Incident based training on the shop floor.



3. Grievances

Evidence that the DA is working well for workers can be seen through an analysis of grievances. The characteristics of a good grievance system include clear communication regarding the process, accessibility (accessible to all, often demonstrated through the use of the system), fairness and impartiality, confidentiality (information shared should be private), timeliness (in terms of speed of resolution), proper documentation, and providing workers with the opportunity to be represented by a colleague or union leader (Katz, Kochan and Colvin, 2017).

In the Year 2 report, which focused on whether grievance data were reliable, we found that workers trusted the grievance system, had no fear of raising grievances, and that the grievances were speedily resolved, with the TTCU and management jointly playing key roles in grievance resolution. In this section, I build on the Year 2 evaluation by examining longitudinal data on different dimensions of the grievance resolution system, such as the number of GBVH and non-GBVH grievances, the grievance categories and the nature of issues, the speed of resolution, and the use of different of grievance channels. Together, these data provide evidence of a well-functioning grievance system.

3.1 GBVH Grievances

The designers of the DA had developed categories of prohibited GBVH practices based on international conventions, national laws, and GBVH as a phenomenon. These categories were specified in Appendix A to the Year 1 report. For consistency, we use these categories to classify GBVH grievances over the three-year period. Table 3.1 shows the number of GBVH grievances by category and issue each year.

Table 3.1. GBVH Number of Grievances by Category and Issue, by Year*

Category	Issue	Year 1 (Apr-Dec 2022)	Year 2 Jan-Dec 2023	Year 3 Jan 24-March 25
1. Retaliation				5
2. GBVH Involving Physical Harm	Unwanted Touch	2	2	
	Physical Harm	1	2	2
	ICC reported GBVH Case			1
3. GBVH Not Involving Physical Harm	Verbal Abuse	10	17	29
	Rumours/Lies		3	2
	GB comments of a sexual nature		2	4
	Favouritism		1	
	Mobility Restrictions	3	1	
	Health and Safety	6		
	Violations of Privacy		1	
	Other**		1	3
4. Violations of FOA related to GBVH				
Total GBVH Grievances		22	30	46

* Classification requires interpretation and judgement by documentation officer—in some cases different kinds of violations happen together—for example physical violence is often accompanied by verbal violence. The documentation officer is required to make judgements as to whether to classify it as one or the other or both.

** The other category in 2024-25 refers to cases where there was intersection with caste discrimination and forced labor.

The primary conclusion to be drawn from Table 3.1 is that there has been a steady increase in the number of cases over the three years, from 22 in 2022 to 30 in 2023 and 46 in the 15 month 2024–2025 period. These increases in the numbers of cases can be attributed to increased awareness of GBVH and increased comfort workers feel in using the grievance system, as was highlighted in the Year 2 report. The fact that most of the increases concerned verbal abuse is noteworthy. Whereas physical or sexual assault is more obvious to the workers, the higher numbers of verbal abuse

cases may reflect heightened awareness that it constitutes a GBVH issue. A review of the subject matter of the GBVH grievances shows no other systemic pattern across the different categories over the three years. .

3.2 Speed of Resolution of GBVH Grievances

Workers' trust in the system is also a function of the efficacy of the system in terms of the speed of grievance resolution. As Table 3.2 shows, GBVH grievances are invariably settled very quickly, with many resolved¹³ on the same day and more than 75% resolved within two weeks.

Table 3.2. Speed of Resolution, GBVH grievances

	Year 1 April 2022-Dec 2022	Year 2 Jan 2023-Dec 2023	Year 3 Jan 2024-March 2025
Resolved Same Day			10
Within One Day		6	5
Within one week	20		15
Within two weeks		16	7
Within one month	1	5	6
Within 2 months	1		1
Within 3 months		3	3
Total Grievances (GBVH)	22	30	46

To provide some insight into the how GBVH grievances are handled, I present two examples below (**Boxes 1 and 2**).

Box 1 describes a verbal abuse grievance that was resolved the same day, while **Box 2** described a verbal abuse case that took more than two months to resolve. These helps us understand how the grievance system works and show the documentation involved.



¹³ Resolution here means that the grievance was resolved in a manner that brought a sense of closure to the grievant.



BOX 1

GBVH GRIEVANCE-SAME DAY RESOLUTION

Grievance Number: 493/2024

Date Reported: 24/10/2024

Reported by: Worker S

Reported to (Intake Channel): TTCU

Appendix A Category: GBVH Not Physical

Appendix A Prohibited Practice: Verbal Abuse

Location: Natchi Shop Floor

Date Resolved: 24/10/2024 (Same Day)

Description: The sewing machine operator, S, raised a concern with Manager A, informing him that she was unable to stitch due to a malfunctioning machine. However, instead of addressing the issue, Manager A remarked that the worker was only fit for cleaning bathrooms “bathroom kaluvatha lakki”. This statement deeply disturbed Worker S, prompting her to file a complaint to TTCU.

Resolution Channel: Union-Management Meeting

Resolution Outcome: TTCU, in coordination with the HR Manager, addressed a concern raised regarding the inappropriate attitude and behavior of Manager A. He was called for an inquiry and was severely warned for his conduct. During the discussion, TTCU emphasized that if he is unable to handle women workers sensitively and professionally, then he is unsuitable to continue in his current role. Manager A was informed by HR and TTCU that his behavior will be closely monitored by two Shop Floor Monitors and the Line Leader on a regular basis. Following the warning, Manager A apologized and assured that such behavior will not be repeated in the future. Meanwhile, the affected worker, S, was provided with one-on-one counseling by TTCU to ensure her well-being and to reinforce the support system available to her.

Appendix A Available Remedy-Immediate Safety: Worker Counselling

Appendix A Available Remedy-Rehabilitative and Worker Guided: Private Apology

Appendix A Available Remedy-Deter Future GBVH: Incident Based Training for Management

BOX 2

GBVH: RESOLUTION IN 3 MONTHS

Grievance Number: 50/2024

Grievance Date: 8/2/2024

Reported by: Worker

Reported to: TTCU

Location: Natchi Shop Floor

Resolved Date: 30/4/24 (Three Months)

Appendix A Category: GBVH Not Physical

Appendix A: Prohibited Practice: Retaliation

Description of the Case: Cutting leader raised a complaint that the Cutting Supervisor falsely accused her of losing 4000 pieces from the cutting department.

Resolution Channel: Union Management Meeting

Resolution Outcome: TTCU immediately discussed the issue with the HR Manager and called Cutting Supervisor and Cutting Manager in for enquiry. When both were questioned, they replied that those pieces were misplaced and found the next day. Cutting Supervisor apologized for his actions and assured he would not repeat the behavior.

Follow-up: On 30 April 2024, Cutting Leader M requested a department change as she faces false accusations and disrespect from Cutting Manager. On further investigation, it was discovered that the Cutting manager was dissatisfied with the transfer of another Cutting Leader R, who was accused of sexual harassment and replaced by Cutting Leader M. Cutting Manager justified his actions with the rationale that Cutting Leader R was good at work when compared to the Cutting Leader M. TTCU was displeased with this response. Cutting Manager was given a severe warning and to practice zero tolerance towards gender violence at the workplace. Cutting Leader M was offered a transfer to the Packing Department, which she accepted. She was also recommended counselling.

Appendix A Available Remedy-Immediate Safety: Worker Counselling

Appendix A Available Remedy-Rehabilitative and Worker Guided: Initial Warning

Appendix A Available Remedy-Deter Future GBVH: Counselling and Training.

Follow up: On 27th April, both top and mid level management staff were sensitized on the POSH act and GBVH by TTCU. On 7th June, 2024 M was provided counselling by counsellor A

In 2022, all cases of GBVH were first reported to the TTCU. In 2023, workers reported 67% of GBVH cases first to the TTCU, but also reported 20% to management and 2% each to the ICC and to the documentation officer. In 2024–2025, the TTCU was contacted first in 89% of the cases, management in 10% of the cases, and the documentation officer in one case. Clearly, for GBVH grievances, the TTCU is the first port of call.

As noted, we interviewed 7 workers who had experienced GBVH in the factory. One of them, an SFM who had faced an issue of verbal violence, later volunteered that there are many instances

in which gender or GBVH issues are *not* formally raised as grievances but are instead resolved by the SFMs themselves, intervening with line leaders and supervisors. For example, a worker whose request to change her seat was initially denied by a supervisor then complained to the SFM and said, “Akka, I am on my period and am not comfortable in this chair. Can you tell this to the supervisor and fix the chair or try to change the workstation?” The SFM was able to get the supervisor to change his decision.¹⁴

Why is the TTCU the first port of call for workers to raise GBVH grievances? Interviews with workers suggest two

¹⁴ Some experts see this as a gender issue but not a GBVH issue. However, the documentation officer classifies this as a GBVH issue.

possible explanations. The first is that TTCU conducts GBVH training, so it is natural for workers to turn to the union first. The second is that workers trust the TTCU given that the union is active at both work and in the community. One of interviewees, an independent consultant, suggested that the TTCU has been active with regard to GBVH issues in workers' communities since 2014: "They have deep roots and a strong understanding of the terrain, including village structures, caste dynamics, and community relationships." Many worker interviewees highlighted the intricate connections between domestic violence at home, the factory, and the activities of the labor union

A GLJ representative told us of several instances in which victims of domestic violence at home contacted the TTCU for help. TTCU has responded in many ways, such as providing shelter for battered women workers at its office. If workers are violently beaten at home and cannot fulfil their production quotas, TTCU works with supervisors and line leaders and other workers to "take up the slack."

In another example, a worker testified to how the TTCU had been helpful in her domestic violence situation. This worker confided in a friend about violence by her husband, who used to beat her regularly after alcohol use. Because this was affecting her ability to meet her production quota, her friend spoke with Thivya Rakini, the TTCU president. Thivya went to the village and talked with the husband, and as a result there has been an appreciable reduction in the domestic abuse. As the worker noted in her interview, "My husband fears fighting with me because I now have support. Earlier, that wasn't the case. Because of the support I have, he is a little scared to even touch me."

Another woman, a survivor of domestic violence, told us, "I never knew such family issues can be addressed in a company, and that has given me courage, confidence, and whatnot."

There are also cases of women carrying trauma from work to home. A woman who experiences GBVH at work may not confide in her husband about it because he may react negatively towards her. It is also possible that

other women in the factory from the same village may tell her husband that she has been seen with another man, tarnishing her reputation, which in turn results in retribution by her husband. Such "moral policing" is quite common in the region and the subject of many ICC meetings (discussed later in this report).

The TTCU had long understood the link between domestic violence and workplace violence highlighted in ILO Convention C 190¹⁵ and had been actively working on these issues. The TTCU had learned by experience that they could not build women's membership in these rural villages without addressing domestic violence. Tackling domestic violence has been central to their organizing strategy. As a labor stakeholder noted, "The role of the TTCU is quite crucial in these cases. Because it is a women-led union, the fluidity of the dual trauma gets recognized—women helping women, in a way that a traditional male-led union may not act." This is what makes workplaces safe for women and their families, and likely explains why the TTCU is the first port of call for GBVH. As a former AFWA member, now an independent consultant, noted, "Thivya provides a survivor-centric view in the village that translates into higher trust in the union." The DA helped formalize the TTCU's work in connecting domestic abuse and workplace violence against women.

If women workers are raising more GBVH grievances because they trust the union and the grievance system, that should hold true for other types of grievances as well. We explore this below.



Union discussions with women in the community.

¹⁵ The preamble to Convention C190 notes that "domestic violence can affect employment, productivity and health and safety, and that governments, employers' and workers' organizations and labour market institutions can help, as part of other measures, to recognize, respond to and address the impacts of domestic violence." ILO Recommendation 06 requires actors to mitigate the effects of domestic violence in the world of work.

3.3. Non-GBVH Grievances

The DA has demonstrated that when workers trust grievance mechanisms for handling GBVH, they become confident about raising a range of non-GBVH issues as well. At Eastman, workers have raised large numbers of non-GBVH grievances in both 2023 and 2024–2025. Table 3.3 reports the number and categories of all grievances (including GBVH) over the two periods of time which merit more discussion.

Table 3.3. Category, Number and Selected examples of Grievances

Category of	2023	2024	2025 First Quarter	Selected Examples of issues
Basic Amenities	99	100	18	Access to biometric; Bad odor at bathroom; Bank account; Basic amenities; Cleaning the bathroom.
Canteen	11	4	1	Insufficient tea; Nan; No refreshments for labour who don't consume tea; Person with skin disease is at customer service; Tea is not hot
Code of Conduct	11	22	16	Absenteeism; Biometric; Conflict with workers; Damaging properties;
Domestic Issue	18	8	1	Birth certificate; Caste based discrimination; Community issue; Complained that her husband is abusing her.; Dispute in the family;
GBVH / False Complaint	20	36	10	
Issues related to job transfers	15	27	4	Job change due to health issue; Feels afraid of scoldings; Forced work roles; targets is burdensome.
Issue related to leave/attendance	15	6		Biometric; Biometric attendance was not recognized.; Code of conduct; Worker are neglecting the biometric device
Issues related to production process	40	44	20	Absence of substitute; Absenteeism; Communication issues; Complaint regarding delays and lack of support in dispatch section; Conflict between workers;
Issues related to Transportation	60	120	18	Access to transport; Accident; Change in time; Change in timing; Change of vehicle;
Mental/Verbal Abuse	15			Yells at trainers
Miscellaneous	15	7	4	Compliant that her phone was lost; Conflict between workers; Dismissed worker was rejoined; Domestic issue; Informing about leave;
Health and Occupational Safety	49	29	17	Ergonomic risks; Heat produced causes piles; Injury in the nail tip; Lack of ppe;
Personal Benefit	58	31	11	Atm; Bank records; Change in unit; Changing bank account; Enquired about educational scholarship.
Social Security	118	130	9	Atm; Claim under esi; Didn't receive the marriage assistance; Educational assistance; Enquired about labour welfare fund.

Table 3.3. Category, Number and Selected examples of Grievances *continued*

Category of	2023	2024	2025 First Quarter	Selected Examples of issues
Wage Clarification/ ID card	19	11	2	Request for salary discrepancy; Requested to claim the pending salary
Caste Based Discrimination	3	2	1	Caste based discrimination; Issue related to transportation; Nan; Verbal abuse; Verbal harassment
Misconduct	12	17	4	Conflict among siblings; Conflict between workers; Conflict among workers in transportation.; Dispute among workers.
Unfair Treatment power dynamics	20			Favouritism; Not informed the health of issue of spouse at work time; Unannounced prizes and favouritism
Freedom of Movement	1			Hostel labour were not let to move out on weekend. Hostel manager was not responsive to labour grievances.
Freedom of Association	1			No awareness about TTCU among workers
Hostel issue	2			Complaints about hostel access
Partiality / Targeting		4		Frequent missing of pieces/accessories
Disrespecting the workers		1		Exhibiting rude behaviour
Livelihood		1		Unannounced closure of unit
Increment		1		Increment for production of jumpers
Issue related to Creche		1		Creche in-charge beating the workers; Requested for Rasam-rice
Physical Abuse		1		Conflict between workers
Recruitment		1	1	Clarified regarding her employee id; Rejoining; Unaware of the recruitment process
Accident		1		Rescue and rehabilitation
Issue related to Overtime		3	1	Confusion on overtime; Requested for over time; Requested for travels
Others		15	2	Conflict with staff regarding ot.; Issue related to ot; Lunch box was lost; Mobile phone was lost; Others
Total	602	623	140	

The numbers of non-GBVH grievances average 50 per month in 2023 and 2024-2025, a testament to the fact that women workers do not hesitate to use the grievance mechanism. The range of issues touches all aspects of work, problems with the transportation system, the canteen, food quality, conflicts between workers, and a host of personal problems. As one worker stated, “The system works.”

What is also interesting is that workers trust the system enough to raise grievances through all channels. While the 2023 report highlighted that the TTCU was the main channel for grievances, workers used both TTCU and management channels almost equally during the January 2024–March 2025 period, with 350 and 351 grievances in each channel, respectively. In general, issues relating to basic amenities, social security issues¹⁶ and personal benefits overwhelmingly went through the management channel, but a few GBVH cases also went to management.

3.4 Speed of Resolution, Non-GBVH Grievances

Trust in the Grievance system is fostered by the quick resolution of non-GBVH grievances as well. Non-GBVH grievances are discussed and acted on speedily. I found that the average resolution time for most non-GBVH grievances was exceptionally fast, as Table 3.4 shows (I used the categories presented in Table 3.3 and selected only those categories in which there was a sizeable number of grievances).

Table 3.4 Average Speed of Resolution of Selected Categories of Non-GBVH Grievances (2024-2025)

Grievances (2024-2025)	Average Resolution Time in Days	Grievances (2024-2025)	Average Resolution Time in Days
Caste	2.00	Basic Amenities	< 1.00
Non-GBVH Verbal Abuse	4.88	Code of Conduct	< 1.00
OSH (Occupational Safety and Health)	7.39	Health & Safety	1.20
Attendance	< 1.00	Issues Related to Social Security	1.30
Production	5.86	Issues Related to Transportation	1.40
Domestic Violence	2.75	Job Transfer	2.00
Other	6.09	Occupational Safety	37.00
Issues Related to Leave	< 1.00	Misconduct	< 1.00
Conflict/dispute among workers	< 1.00		

In general, the data show that in the case of the DA, women report grievances without any fear of retaliation, in large part due to their trust in the union, but also due to the FOA in the factory. This is discussed next.

¹⁶ The most common social security issues with which workers require help are in dealing with the government offices that administer the Employees Provident Funds (a mandatory government-backed retirement savings scheme designed for salaried employees based on employer and employee contributions) and Employees State Insurance (a legally mandated insurance system that provides employees with medical, sickness, maternity, disablement, dependent, and funeral expense benefits), funded by contributions from employers and employees.

4. Freedom of Association and Labor-Management Collaboration

The DA program agreement between the TTCU and Eastman Exports outlines the TTCU's role in the administration of the agreement, while its Appendix A on "Prohibited Practices and Available Remedies" specifically prohibits both GBVH as defined under C190 and violations of freedom of association (FOA). Appendix A also defines FOA as "the protected rights of workers and trade unions under ILO Convention C87 (freedom of association) and C98 (the right to collective bargaining) including their interpretation by the ILO Supervisory bodies and under the UN Covenant on Civil and Political Rights and the UN Covenant on Economic, Social and Economic Rights and their interpretation by relevant UN bodies." Clearly, the AFWA, TTCU and GLJ envisioned FOA as a *key pathway* to the achievement of the goal of preventing, remediating and eliminating GBVH. A condition of the DA was that Eastman management agree to let the TTCU into the factory and speak to the workers. Both management and the TTCU jointly announced the introduction of FOA rights. The DA also has a provision that labor stakeholders can trigger brand-imposed penalties on the management if they violate FOA. Therefore, it is necessary to examine whether FOA is functioning effectively in the factory.

A good sign of effective functioning of FOA in the factory is whether labor-management relations are collaborative in ways that deliver mutual gains. Necessary conditions for effective FOA include a strong representative union (a union that enjoys majority support of the workers); where union leadership has unfettered access to workers to listen to grievances and complaints and carry out their representative function; and where there is regular social dialogue between union and management, with a high degree of trust and respect for each other (Katz, Kochan and Colvin, 2017). Below, I provide varied evidence showing that FOA is functioning effectively.



Women workers meeting with union under the tree.

4.1 Access and Regularity of Interactions

It is common in India for unions to have external as well as internal leadership, and TTCU President Thivya Rakini (not an employee) is a very active external leader, typically visiting the factory twice a week. Her visits are logged in the visitors' logbook. She is given complete access to all areas of the factory, and she is extremely visible around the factory and in the canteen. Each visit typically involves meeting with workers during their breaks and talking to them at their work-stations. Workers most often meet with TTCU officers at a location in front of the creche, which has benches surrounding a neem tree.



Labor management discussions with workers.

More often than not during each visit, the TTCU president also has a formal meeting with the HR manager in which the issues discussed are documented. I tallied union-management meeting counts (meetings between Thivya Rakini and HR manager Sakthi Saravanan) with the union visits in the logbook) and found that these meetings had taken place 80% of the times the union president visited the factory. Most TTCU visits that did not include a meeting with the HR manager were when the HR manager was unavailable or when the TTCU came to conduct training. TTCU visits also coincided with visits by program staff, who documents union-management meeting discussions.

Table 4.1 shows the number of visits made by the TTCU and program staff (which includes the program associate and the document officer, who does the documentation for the Natchi and Spinning/printing units), respectively. Visits to each unit are logged separately in the logbook, but it is possible that TTCU visited multiple units on each visit. As the table shows, the number of visits is high and there are typically more than two each week.

Table 4.1 TTCU Visits and Union-Management Meetings

Year	Facilities	Number of Visits made by TTCU Leadership	Totals
April 2022 – Dec 2022	Natchi Apparel	57	81
	Spinning	12	
	Printing	12	
Jan-Dec 2023	Natchi Apparel	101	221
	Spinning	82	
	Printing	38	
Jan-Dec 2024	Natch Apparel	121	139
	Spinning	15	
	Printing	3	
Jan-March 2025	Natchi Apparel	30	35
	Spinning	4	
	Printing	1	

4.2 Union-Management Meetings

I read through the content of union-management meetings, which were mostly related to grievances raised each week. In each case, the discussions were substantive and generally resulted in a resolution. In fact, over the January 2024–March 2025 period, a clear majority of grievances were resolved through union-management dialogue, as Table 4.2 shows. Note that a significant percentage were also resolved independently by management, but as pointed out earlier many of the grievances reported directly to management concern basic amenities and social security-related queries, which are squarely in management’s domain. One worker indicated that they have a higher degree of trust in the management staff than previously, and that “many issues are addressed by Ms. Sumathi [DA program staff] or Ms. Manimegalai [the welfare officer], and only escalated to HR if needed.”

Table 4.2 Percentage of Grievances by Remediation Channel:

Quarter	Union-Management Dialogue	Management	Union	Hostel Warden	Welfare Officer
2024 Q1	40%	40%	9%	8%	3%
2024 Q2	42%	47%	5%	4%	2%
2024 Q3	36%	53%	7%	3%	2%
2024 Q4	45%	43%	7%	6%	
2025 Q5	54%	40%	4%		2%



4.3 Mutual Gains

It is important to emphasize that there are some problems raised by management that are also resolved through union-management dialogue—so the process benefits not only workers but also management. When management brings these issues up, they are recorded as grievances. Tracking them through the grievance system and union-management document notes, a time-consuming task, reveals general evidence that management requests the union's help to resolve various issues connected with production, overtime, layoffs and salaries.

Analysis of grievance records shows that management solicits union help in informing workers about the reasons for changes in production processes that require worker reassignments, and to resolve grievances connected with such these reassignment. Often, delays in shipping create delays in providing “standard conditions” for production workers such as lights, fans, and trolleys, and the union is kept informed so that it can help explain these delays to workers. The union is always consulted well in advance to get a sense of worker concerns before management announces layoff plans due to a lack of orders. And the union is consulted when urgent shipping of orders requires overtime or Sunday work. Thus, there are many ways in which union-management dialogue has contributed to increased productivity. The union plays a key role in bridging communication gaps, building trust, and encouraging worker cooperation, to the benefit of both parties. **Box 3** offers an example taken from the union-management discussion logs, and **Box 4** presents an example taken from the grievance record.

BOX 3

MUTUAL GAINS EXAMPLE FROM LABOR MANAGEMENT MEETING LOG

Punching : The factory's official working hours begin at 8:00 AM. However, it was observed that workers were taking their breakfast and starting work only by 8:10 AM. Similarly, in the evening, although the designated punching time is 4:40 PM, workers were punching out before the scheduled time. To address this issue, the management sought support from the union. The union gathered the workers, explained the importance of time management, and sensitized them on maintaining discipline. Following this intervention, the workers accepted the guidance and began adhering to the scheduled timings, thereby improving punctuality.

BOX 4

GRIEVANCE: MUTUAL GAINS

Grievance Number: 46/2025

Grievance Date: 13/2/2025

Reported by: Worker

Reported to: TTCU

Location: Natchi Shop Floor

Resolved Date: 20/2/25 (1 Week)

Category

Description: A group of workers raised a concern regarding the recognition process for achieving production targets. They stated that when a line meets the target, the management provides an award and trophy, which is kept at the line level. However, some workers expressed that they would prefer to receive individual gifts or recognition instead of a shared team award. This concern was brought to the attention of the TTCU for further discussion and possible resolution.

Resolution Channel: Union Management Meeting.

Resolution Outcome: TTCU, in discussion with the HR Manager, agreed on a motivational strategy to encourage improved performance and quality among workers. It was decided that a trophy would be awarded to the line that meets production targets and maintains high-quality output. To further motivate workers, it was also decided that if a line consistently wins the trophy for 3 out of 4 weeks in a month, then individual appreciation prizes will be given to the workers of that line. This initiative aims to foster healthy competition, build team spirit, and maintain sustained performance. The strategy was explained to the workers, who welcomed and accepted the new approach with enthusiasm.

A positive externality of FOA and the grievance procedure, noted by a brand representative, is that all national laws are getting better implemented, which is beneficial to both labor and management.

The exit-voice tradeoff (Freeman and Medoff, 1984; Hirschman 1972), which states that workers provided with voice will use that voice rather than resorting to leaving the organization, is a core concept in labor relations. I have demonstrated through examples above that both the grievance system and FOA—each an example of worker voice—are functioning effectively in this factory. It is logical, then, to expect that the provision of voice will reduce absenteeism and potentially reduce exit (turnover). I did not find any clear evidence that the DA has reduced turnover. Figure 1 shows a declining turnover trend, but the decline is not statistically significant.

There is clear evidence, though, that absenteeism has steadily reduced from a high of 25% in the first quarter of 2022 to around 10 percent in the last quarter of 2024 and first quarter 2025, as Figure 2 shows. Reductions in absenteeism enhance overall factory productivity, and stabilizes the workforce, allowing management to plan production more efficiently.

Figure 1. Attrition at Natchi Apparel Unit

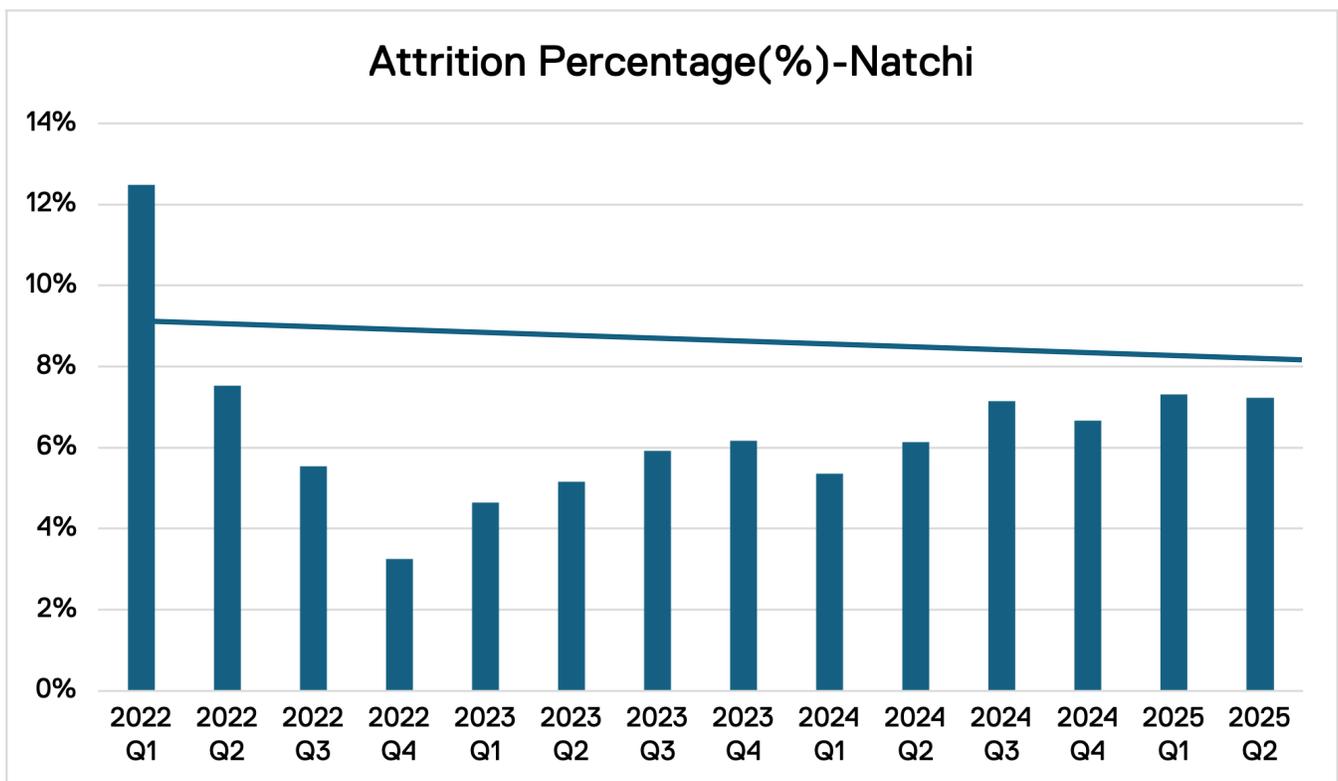
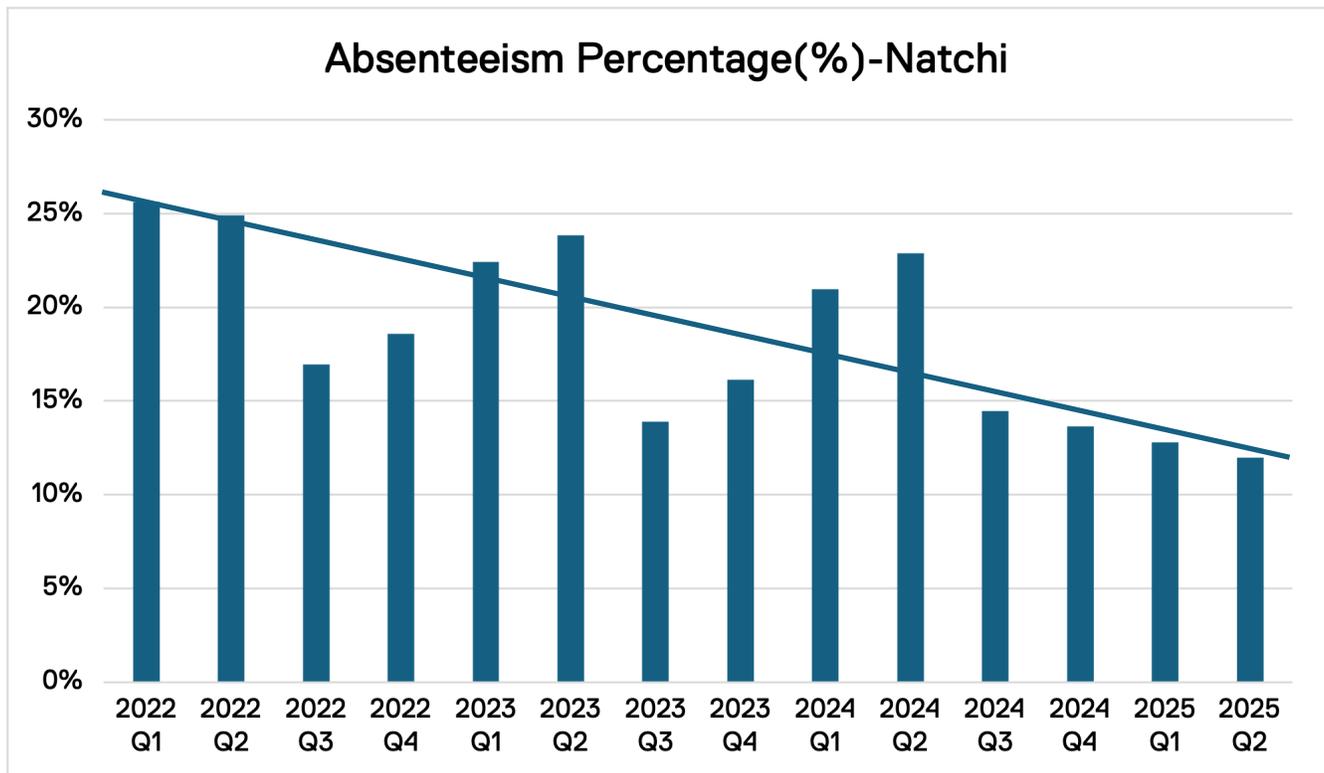


Figure 2. Absenteeism at Natchi Apparel Unit



4.4 Interviewee Perspectives on the Quality of Union-Management Relations

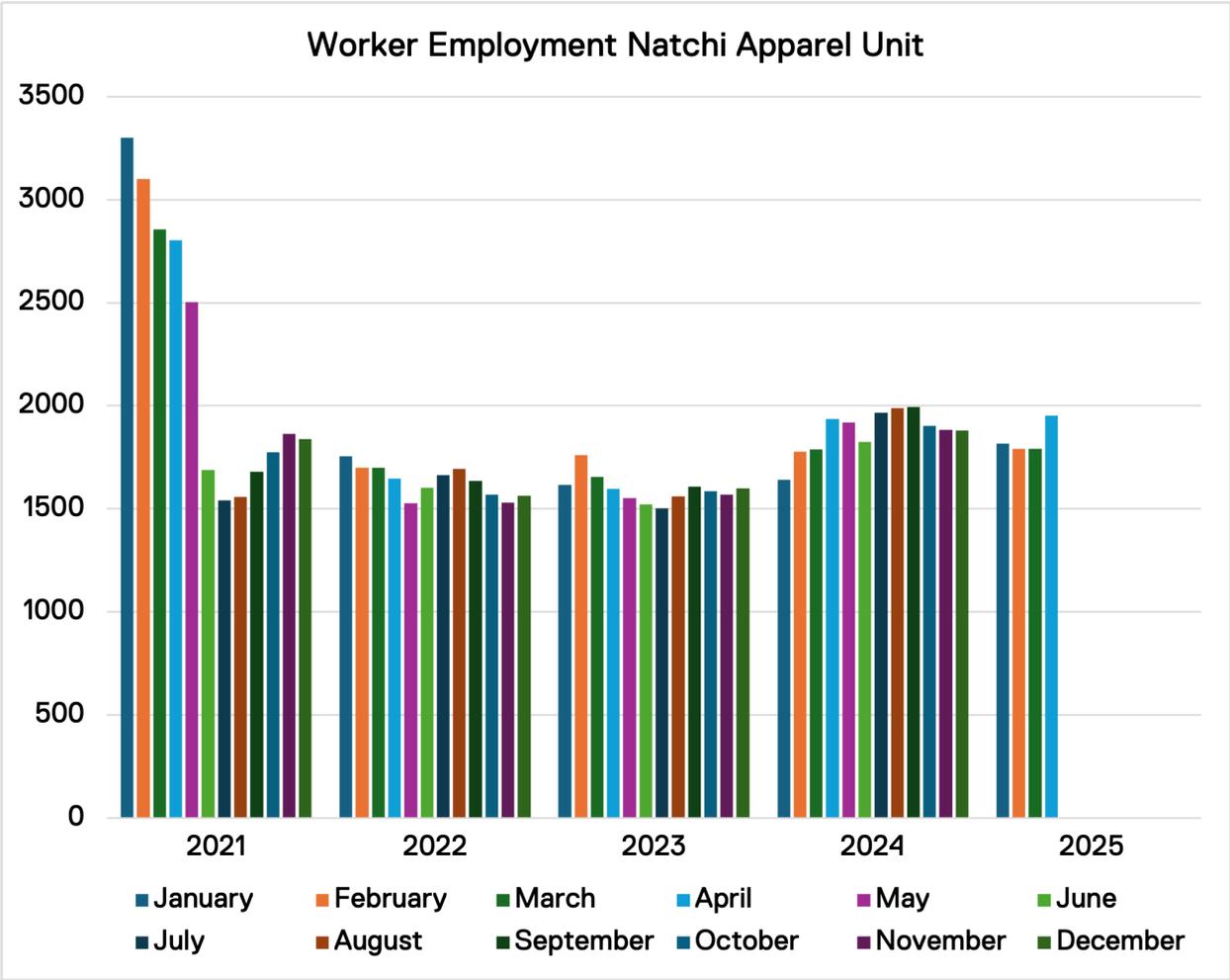
As most interviewees attested, union-management dialogue at this factory is excellent, and is perhaps unparalleled in the global apparel industry. In fact, an AFWA representative noted not having seen this level of unfettered union access to the factory and such labor-management collaboration in any of the apparel factories in the countries of the Global South where AFWA operates (Indonesia, Bangladesh, Cambodia, Vietnam, India, Pakistan, Sri Lanka, and Myanmar). A senior management representative noted that “working with [TTCU president] Thivya has been very good—she is able to understand business operational issues. For instance, there was a period during which yarn prices increased so much that making underwear became temporarily unprofitable, and as a result of her intervention, we were able to move workers to the T-shirt line.” Another brand representative noted that Thivya wants the factory to flourish. Clearly, these comments suggest that while the TTCU is a strongly independent union that tirelessly represents its members, its leaders are cognizant of the need to collaborate with management for business sustainability. A testament to labor-management cooperation can be seen in the HR manager’s jocular comment to me that “she is the HR manager, too.”

One of the ICC external assessors (who visits the facility only for ICC meetings) also attributes the labor-management collaboration to the positive relationship between the TTCU president and the senior vice president of Quality Assurance and ESG, who is in charge of all matters concerning the DA. This sentiment was echoed by another brand representative, as well as a member of the OC.

5. Impact of the DA on the Business

The sections above highlight how well the Dindigul agreement is working for the workers and for the stability of labor management relations. But it is also essential to determine whether the DA has brought about increased business (in terms of sourcing) and, consequentially, increased employment for workers. An examination of employment levels at the Natchi unit presents a sobering picture. As the data in Figure 3 show, the apparel unit workforce numbered 3300 in January 2021, before Jeyasre’s death.

Figure 3. Worker Employment at Natchi Apparel Unit



When the last large-quantity shipments to H&M ended in May-June 2021, employment at the apparel unit dropped to 1,689 workers in June and further to 1,540 by July of that year, a decline of approximately 50% since January¹⁷. It took another *three years*, until April 2024, before the highest employment number of 1,932 workers was reached—and that figure was only 58% of the number of workers in the Natchi unit in January 2021. In April 2025, the latest month for which I have data, the Natchi unit employed 1817 workers, roughly 55% of the number in January 2021.

¹⁷ Note that we do not report the number of workers in the spinning unit, which is also covered by the DA. Because the spinning unit provides other Eastman units with yarn, for which demand is relatively constant, it enjoys more stable business. This is why the number of workers trained reported in Table 1, which includes the spinning unit, differs from the employment numbers reported here.

When H&M did not renew sourcing after its order was fulfilled,¹⁸ management prioritized and advanced core orders where feasible, in their effort to maintain operational continuity through this period of declining orders and lower employment—a solution that was only possible for a limited time. In addition, during the early 2021 period, there were Covid-related restrictions at the district level that compelled the factory to rely solely on the local workforce. Before January 2021, management would aggressively recruit migrant workers from Orissa and Jharkand, but given the decline in business after January 2021, such recruitment has been curtailed. In fact, at this writing only 430 workers (400 of whom are migrants) occupy the hostel, which was built to house 1,200 workers.

To better understand the impact of the reduction in sourcing and the factory's inability of to attract similar new business, it is instructive to examine the role of H&M as a buyer in the factory. In the years leading up to 2021, H&M was a big buyer of T-shirts from Natchi. The company sourced a limited range of 5–6 styles that allowed Natchi to produce at high volume, creating for the factory the stable, long production runs for making money in a low-margin business. Workers even referred to one of the factory units as the “H&M shed.”

Natchi produced a range of other products as well—especially underwear, which is a lower-margin business than T-shirts. If approximately 50% of production was outerwear, such as H&M T-shirts, the factory's business would be sustainable. In fact, in late 2020, the factory had contracted with a consultant to advise on investment in new machinery and systems to increase factory productivity. In many ways, the factory skill mix dictates the appropriate product mix the factory can accept, and the skill mix, at that time, did not quite allow for producing 100% value-added outerwear. Overall factory efficiency varies dramatically according to factory skill levels, and it was not always easy to find

the number of people required to work in the higher-skill sewing positions. While most migrant workers tend to choose sewing operator jobs given the higher earning potential, local workers often tend to opt for other positions in the factory.

An examination of factory production data shows a steady shift in the product mix after fiscal year 2021–2022 toward more underwear and other low-margin products. As a result, financial data show a steady decline in FOB revenues between FY 2021–2022 and 2024–2025. Although production volumes of such products have increased somewhat, overall machinery utilization has not increased. The apparel unit must continue to spend money to maintain the building and unused machines. Average wages and employment costs have increased year to year, as has the cost of electricity, diesel, and layoff payments to workers (note that layoffs are temporary in India and workers must still be paid a portion of their wages and benefits). Overall, therefore, given the increase in costs, the persistence of low-margin products, and the resulting decline in revenues, the data unequivocally show that the apparel unit has been steadily experiencing losses that have grown every year during the 2022–2025 period.¹⁹

If the claim is that the Dindigul agreement is a successful case of addressing (remediating, preventing, and eliminating) GBVH through FOA—a claim that I strongly endorse in this report—it raises an important question: **Why is that global brands do not source from this “model” factory?** Eastman has attempted to increase sourcing from new brands (while also engaging in a range of actions to try to increase production in Natchi), but with little success. Eastman was unable to replace H&M with a similar high-volume high value buyer. The fact that no other brands have indicated interest seems to render as unwarranted an assumption held by some stakeholders—that if relatively progressive leading global brands such as H&M, Gap Inc., and PVH Corp. signed on

18 Feedback by stakeholders indicated disagreement between AFWA and GLJ on the one hand and H&M on the other regarding the end of its orders and H&M's decision not to renew sourcing. I did not attempt to investigate or reconcile these views, because they have been addressed in other reports and this report's focus is on impact, replicability and scalability.

19 These financial issues raise the question of why this one factory in the Eastman stable is still in operation. The answer is that it is of sentimental importance: the Natchi Factory is named after Natchimuthu Gounder, a brother of the founder of the Eastman Group of companies. It was originally established as a training center for women to provide them with employable skills in the garment industry. The high degree of interest in training shown by a large number of local women convinced the family to upgrade the training center to a full apparel production unit.

to the agreement there would be a slew of other brands following suit.²⁰

It is beyond the scope of this research project to inquire into why other global brands do not source from the Natchi. My interviews with stakeholders give rise to some potential explanations, which would be good questions for future research. I raise them briefly below.

The first is that Eastman's reputational losses resulting from the Jayasre tragedy has caused some internal dissension between the sourcing and compliance departments of brands. As prior research has shown, global brands are increasingly linking their sourcing policies with their compliance policies (Amengual et al 2023, Kuruvilla 2021) in ways that give compliance departments a voice in sourcing decisions. In this case, as Eastman explains, sourcing staff at various companies have shown an interest in Natchi, but there has been no follow-through in terms of orders. Many stakeholders (including some labor stakeholder representatives, Eastman representatives, and brand representatives) speculate that the stories about femicide at Natchi published in *The Guardian* newspaper in early 2021 has created a chilling effect among *sustainability* departments of UK-based brands. As the owner of Eastman (Natchi) suggested, "Brands look for many things—price, quality, delivery time, compliance and so forth. And many of those things are negotiable. But with a tragic story like this, even small things that are routinely dealt with in negotiated settlements become big things that will cause a breakdown in talks."

A second potential explanation advanced by one of the signatory brand representatives is that the Withhold Release Order (WRO) issued by the US Customs and Border Protection (CBP) against Natchi Apparel (P) Ltd. in July 2022 may have had a chilling effect on brands' decisions to source from Natchi. The WRO was lifted within a short seven-week period, in large part because GLJ and other labor stakeholders highlighted the DA agreement as one that remediates GBVH and eliminates a major source of supply chain risk. This brand representative, however, thinks that lifting the WRO has

not reversed that chilling effect for many brands.

A third potential explanation is that brands may have been induced to source from Natchi if more positive stories about the Dindigul agreement had made it into the international media. This issue was also the subject of discussion by stakeholders at implementation committee meetings in 2023, as well as OC meetings in 2023 and 2024.

From my perspective, there is a need to create narratives about how things have changed since 2021 when the DA was established. The DA is innovative. Institutional theory, which explains organizational isomorphism (why firms in a field become similar over time through adoption of similar practices), suggests that innovations diffuse and are adopted due to different pressures (Meyer and Rowan 1977; DiMaggio and Powell 1983). Companies are coerced into accepting an innovation through, say, legislation or activist pressure and media exposes. Companies also feel pressure to *imitate* best practices, since they tend to benchmark against other comparable organizations. Finally, innovations also diffuse due to *normative influences* from interorganizational networks to which key actors belong. Although both signatory brands and labor stakeholders have made commendable efforts to promote the best practices in the DA through their media networks,²¹ these efforts have not yet borne fruit in terms of new sourcing, and more efforts may be needed.

A fourth explanation voiced by one of the labor stakeholders is that H&M's decision to stop sourcing may have had a chilling effect on other brands sourcing decisions. A fifth potential explanation voiced by several interviewees is that global brands will not source from Natchi because of the presence of a union, which some see as an unacceptable risk. A sixth one is the misconception that sourcing from Natchi requires brands to sign on to the agreement, and many brands are allergic to the concept of legally binding agreements. And a final explanation by a brand representative is that Natchi has not been able to attract a major brand with large-volume high-value requirements to source from the

20 In the context of supply chains, "progressive" brands are those with a reputation for having well-developed corporate social responsibility programs that focus on human rights in their supply chains.

21 This is one of many examples where the stakeholders differ in their assessments. TTCU and Eastman claim that both brand and labor stakeholders could have taken more steps to *create new narratives* to counter the older 2021 ones. Brands and labor stakeholders feel that they made major efforts to that end.

factory because its terms and skill sets may not fit brand requirements.

These potential explanations constitute meaningful questions for future research.

This leaves the question of why even signatory brands, which are more aware of the positive effects of the DA, have not commenced or resumed sourcing from Natchi. At the outset, it is important to mention that unlike H&M, neither GAP Inc. nor PVH Corp. ever sourced from Natchi, although GAP Inc. continues to source from other Eastman group factories, while PVH had done so previously. It is equally important to acknowledge that Eastman has *never* offered the Natchi factory for sourcing consideration to either Gap Inc. or PVH Corp.

Understanding why signatory brands have not commenced or resumed sourcing at Natchi requires a close reading of the individual brand agreements that each of them have signed with the labor stakeholders. Note that these agreements are strictly confidential and have not been shared with me; my understanding of them comes from piecing together what individual stakeholders have shared in interviews.

Briefly, in these agreements, sourcing decisions are tied to Eastman's performance. The brands commit to maintain their baseline sourcing with the Eastman company (not the Natchi factory) during the course of the agreement. If the factory is not compliant with the terms of the agreement, the brands are obligated to use their economic leverage by reducing sourcing in a phased manner to encourage the faculty to comply; if the factory has a good compliance record—no material default in their agreement with the union during the preceding 12 months—the brands are obligated to *consider* increased sourcing. The specific language varies across the three brands. For GAP Inc. and PVH Corp., which sourced from Eastman (though not the Natchi factory (including both apparel and spinning mills²²), Eastman's performance could trigger a response either to maintain or cut orders, but in no case does it require a commitment to increase sourcing. In the H&M

case, which ended sourcing, the contract language requires that the brand review its relationship with Eastman after 12 months of the DA, but specifies that it should *not* be interpreted as a commitment to business and that nothing shall require the brand to place orders with Eastman.

The agreements further require that the brands meet with labor stakeholders once each quarter to provide updates regarding their sourcing plans. Labor stakeholders can also ask the brands for specific sourcing data from the covered factories to verify compliance with the agreement. Brands are required to share these data with GLJ. In case of a dispute between brands and labor stakeholders regarding compliance with the agreement, the parties are required as a first step to submit the dispute to a non-adversarial method before proceeding to arbitration.

Clearly, even after the positive Year 2 report by Jerrentrup and Kuruvilla (2023), signatory brands have not committed to sourcing changes. Interviews with the brands reveal that many factors influence their sourcing strategies—including Eastman's quality and capability; external events such as Covid; industry shifts toward increased supplier consolidation, which requires suppliers to be multi-faceted; and the timing of sourcing decisions, which can make it difficult for brands to make sourcing commitments. The key point is that these agreements do not *require* brands to increase sourcing.

One of the stakeholders questioned whether the sourcing language in the DA could have been stronger. Its sourcing language is broadly similar to language in other single-factory enforceable brand agreements (EBAs) such as the Lesotho agreement. To be fair, as Fudge and Lebaron (2026 forthcoming) note, it is extremely difficult to difficult to obtain good sourcing language in EBAs that cover only one factory, partly due to the complexities in sourcing decisions referred to above. It is easier to obtain more definitive language when an agreement covers a majority of supplier factories in a sector, as in the case of the Bangladesh Accord and Fair Food Program or even the ACT

22 Formally, the apparel factory and the spinning unit have different names—Natchi Apparel and Eastman Spinning Mills—although they are in the same location.

agreement.²³ Brands are more likely to make more definite commitments in such cases.

Whatever the contract language issues, there has been an expectation on the part of workers (noted in the Year 2 report) that a positive performance by Eastman in terms of the DA would be rewarded with increased sourcing. Both TTCU and Eastman indicated that they had also expected that a positive performance on implementing the DA would result in a resumption or increase in sourcing, and had communicated this expectation to workers.²⁴

As the movement toward supply chain consolidation increases, and leading global firms begin developing partnership agreements with suppliers, including committing to multi-year orders (Kuruville and Li 2025), obtaining more definitive sourcing language will become easier. At present, though, sourcing strategies in the global apparel industry are generally driven by price (Kuruville and Li 2025), creating supplier competition, which gives brands an exit option rather than a commitment option.

Question 1: Summary & Conclusion

Overall, the evidence clearly shows that the DA is working well for workers and is meeting the objectives of its creators. Training helps increase awareness of GBVH among workers, who are aware of their rights and exercise them through the grievance procedure, which in turn is embedded in a context of highly collaborative labor-management relations. The TTCU's activities to empower women in both the factory and in the communities where these workers live has fostered a high level of trust in the union, which is why it is the preferred channel for GBVH grievances. The multi-channel grievance procedure works well; grievances are

generally resolved quickly, mostly due to excellent labor-management collaboration.

Many of my *non-worker* interviewees attested to the fact that women workers exhibit a degree of confidence that they have not seen in other factories. A union representative noted that “before the DA, the women workers experienced a lot of verbal abuse by the supervisors but now they feel confident and safe about raising their concerns and complaints.” A representative of a global brand talked about how the “workers seem happier.” Another brand representative noted that “the workers we met spoke to us boldly, confidently, openly. It felt qualitatively different to what I experience in other Tirupur factories.” Yet another brand representative indicated that “TTCU has done a very heavy lift and workers have found confidence and their voice through TTCU.” The external chair of the Oversight Committee, who has vast experience working on GBVH against women workers, indicated in her interview that “between our year one visit [and] our year two visit, I saw a significant difference in how women owned their workspaces within the factory—they move around with an aura of self-confidence. You can see it in the way they hold themselves.”

In the village, we discussed with workers how the DA has impacted their lives outside the factory. They talked about how the training and counseling had empowered them to seek divorces or separations—that they no longer feel trapped in violent relationships. Other workers mentioned increased confidence that has spurred them to speak up at school meetings and become more active in the village *panchayat* (the unit through which village inhabitants participate in local government), and to “also to ask questions to caste leaders—in other words, our *capacity* is increased.”

One of the external independent assessors of the ICC felt that the DA has contributed to the

23 The Bangladesh Accord, the International Accord, and the Fair Food Program referenced above have sourcing language that, *in my view, is more definitive* than that found in the DA. The Fair Food Program requires that brands source only from compliant suppliers. The International Accord requires a commitment to maintain sourcing from the country during the agreement, but not from any specific factory, and to continue to contribute to the safety programs for 18 months even if they stop sourcing from a particular factory if no other Accord lead firm is in that factory. For more detail, please see: <https://fairfoodprogram.org/buyers/>; <https://internationalaccord.org/>. The ACT agreement is not strictly comparable, as brands are required to “concentrate” their sourcing at factories with CBAs but sourcing levels are not tied to compliance performance of suppliers. GLJ, which disagrees with my view, argues that none of those agreements require an increase in sourcing.

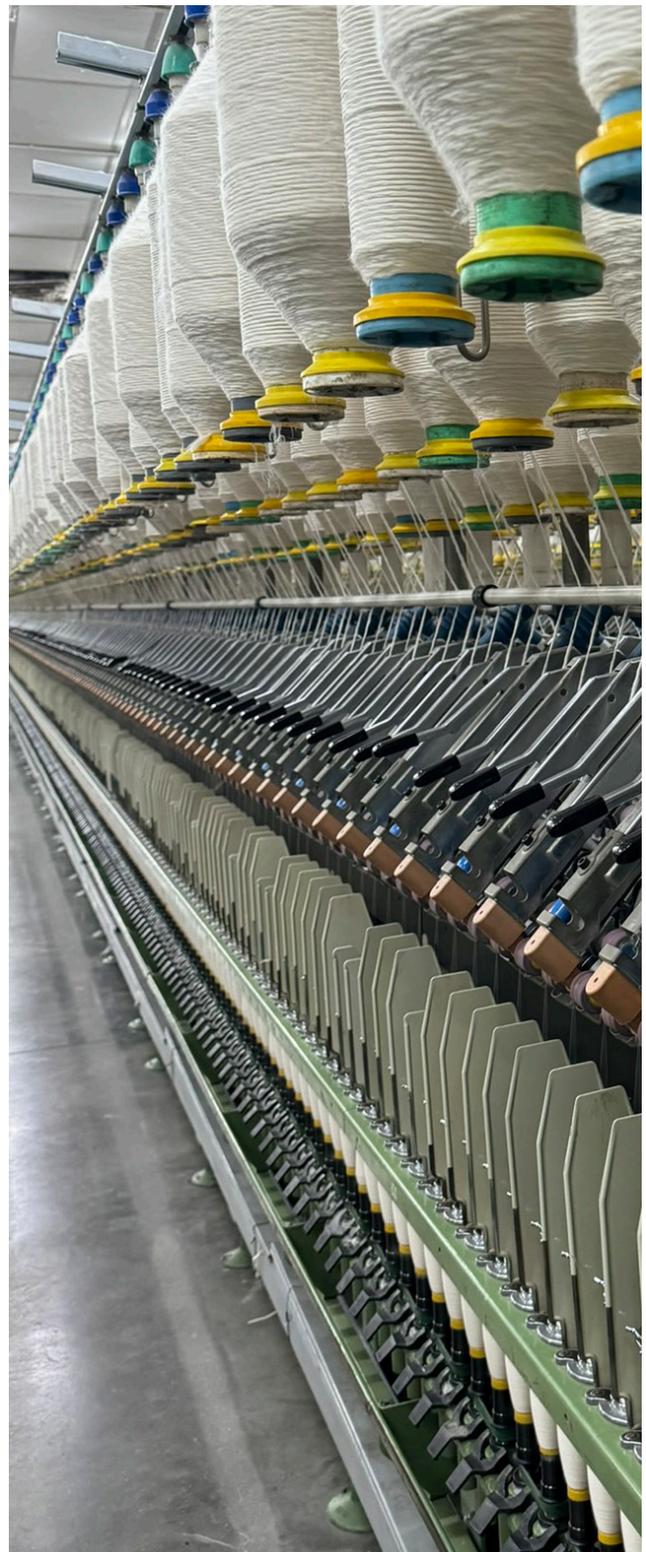
24 Here, too, there was disagreement. While the brand representatives argue that they have met their obligations in these contractual agreements, one labor stakeholder perceives that H&M has not made a good-faith effort to resume sourcing after positive reports on the agreement.

“professionalization” of the workforce and has reduced the “gossip culture” and “moral policing” common to the region (discussed in greater detail in section 2). A driver noted that “a lot has changed in terms of workplace safety since the Jeyasre incident, which I did not think was possible,” and a woman worker said, “We are praying to God that there are more such orders like this agreement that let women like us work safely and be independent.” Finally, from a sexual harassment survivor: “Eastman Exports is my lucky charm.”

Key indicators of the success of the DA can be summarized as follows:

- a) *Increased awareness of GBVH concepts through trainings.*
- b) *Increased worker access to skilled counselors*
- c) *Increased GBVH and other grievance reporting due to grievance procedure and FOA*
- d) *Reduced escalation of GBVH instances due to rapid response by Worker SFMs.*
- e) *Rapid resolution of grievances through labor-management collaboration.*
- f) *Increased trust in the grievance and response mechanism.*
- g) *Formalization of the TTCU’s efforts to address GBVH at work as well as home.*
- h) *Increased worker empowerment to voice and act on GBVH and other issues at work and in their communities.*
- h) *Expansive engagement of ICCs contribute to nuanced understanding of GBVH among workers.*

For Eastman management, unfortunately, its commitment to addressing GBVH and supporting FOA has *not* yet translated into more business, which is key to both sustained financial health and jobs for the workers.



QUESTION 2:

WHY DOES THE AGREEMENT WORK FOR WORKERS?

Having presented various indicators that show the DA is working for workers, it is important to ask *why* it works.

The Dindigul Agreement is a **complex mix** of actors and institutions that have together contributed to its success. As Figure 4 shows, the mix includes AFWA, GLJ, TTCU, Eastman, Oversight Committee (OC), the Implementation committee (IP), Internal Complaints Committees (ICCs), program staff, grievance system, training, counseling, shopfloor monitors (SFMs), and labor-management collaboration. It is important to disentangle their contributions in order to consider the DA's replicability (Section 3) and scalability (Section 4).

Figure 4. Actors and Institutions: Dindigul Agreement



The roles and *relative* contribution of these actors and institutions vary across time, and so it is useful for analysis to distinguish between the establishment phases and the institutionalization phases of the Dindigul Agreement—which I base primarily on my interviews with agreement signatories, who are the experts on the DA, and some of their representatives, and secondarily on other actors with varying degrees of direct information.²⁵

The *establishment phase* begins with the Jeyasre's death in January 2021 and extends through the signing of the agreement in April 2022 until the end of 2022. I call this the establishment phase because the institutions of the DA were getting established; there was some experimentation with training providers; and the DA designers (AFWA and GLJ) were on the ground advising, training, and otherwise helping the TTCU and management implement the agreement.

I define as the *institutionalization phase* the 2023–2024 period, during which key actors and institutions such as the TTCU, management, SFMs, and ICCs gradually began to function more autonomously.

²⁵ Different actors offered differing recollections and narratives regarding certain events, their importance, and the roles they and others played. It was not always possible for me to reconcile these differences.

Note that these dates are somewhat arbitrary, and it is possible that the establishment phase extended into 2023, and that the actors crucial to this phase may have continued to be active, to various degrees in the next phase.

Establishment Phase

AFWA, GLJ, and the TTCU all played major roles in the establishment and implementation of the agreement. Here I briefly highlight the key events and roles; this is in no way a comprehensive history. I do so because I am often confronted by readers and observers with the simplistic argument that the Dindigul Agreement occurred primarily because of the Jeyasre tragedy. While it was a trigger, it is useful to highlight that the preparatory work done by all three labor stakeholders *before* Jeyasre's death, as well as after the tragedy, was crucial to the *general establishment* of this innovative agreement. In other words, this innovation came from prepared minds.

AFWA

AFWA's role had been important *prior* to the DA, and AFWA—an alliance of trade unions, including TTCU—was instrumental in the DA's establishment and design. AFWA had been active in strengthening its member unions in the Global South for several years. It was founded by trade unions in Asia that came together because they found that wage bargaining with suppliers at the national level could not achieve a living wage without a global supply chain bargaining strategy that included brands (Bhattacharjee and Roy 2012). AFWA was among the first organizations to conceptualize the connection between supply chain and gender (after the 2016 ILC meetings), and to craft an organizing strategy around these issues. AFWA and GLJ (along with other unions) had already published reports of GBVH in factories belonging to major brands such as H&M, GAP, and Walmart in India, Cambodia, Bangladesh, Sri Lanka, and Indonesia (available on AFWA's website). AFWA had previously published its "Safe Circles" approach to preventing, remediating and eliminating GBVH in 2019 (read the report [here](#)). And AFWA worked with both GLJ and TTCU to investigate and document events that anchored the year-long Justice for Jeyasre international campaign that culminated in the DA.

TTCU

Founded in 2013, TTCU is a women-led trade union primarily representing 13,000 female Dalit garment workers in Tamilnadu, with a stated mission to create workplaces that uphold dignity, safety and equality for women workers. The TTCU's vision for trade unionism is that it go beyond factory-based representation to holistic support for community resilience, systemic social change, and leadership development among women. It emerged from grassroots campaigns led by Dalit women to end child labor and dismantle the exploitative Sumangali Scheme by building women worker-led village committees to amplify women's collective voices. As the organization grew, it began representing women factory workers in a wide range of labor violation cases, through its paralegal program. The TTCU also led a landmark campaign against the practice of forcing women to take pills to delay menstruation—a coercive policy used by many Tamil Nadu garment factories to prevent women from taking leave during peak production periods. TTCU's efforts resulted in a government ban on the practice.

Jeyasre's mother was an active TTCU member. In the aftermath of Jeyasre's death, TTCU worked together with AFWA on the family's response to the murder, collecting evidence, writing fact-finding reports, managing interactions with various political parties such as Viduthalai Chiruthaigal Katch (VCK), working on a response to charges filed by police against the family, and helping legal representation in the local and high courts. TTCU's rootedness in the community is a major reason for the legitimacy it enjoys among workers in the Eastman factory.

GLJ

Founded in 1986 as the International Labor Rights Forum, GLJ is an independent nonprofit that supports workers and unions around the world in exercising their right to freedom of association. GLJ has a long history of supporting worker movements and unions in advocating for an economy free of forced and child labor. In the context of the DA, GLJ worked at the international and US levels, organized the Workers Rights Consortium investigations at Natchi, and used its long history of engagement with global brands such as H&M, Gap Inc., and PVH to ultimately bring about the agreement. After the agreement, GLJ was instrumental

in getting the US CBP Withhold Release Order lifted, saving business for Natchi, as well as further cementing Eastman's commitment to the agreement and successful implementation of the DA.

TTCU, GLJ and AFWA together launched the global Justice for Jeyasre campaign, which at its heart had three central demands: drop the charges filed by the police against community members in Jeyasre's village; pay adequate compensation to the family; and secure an enforceable brand agreement in the factory that recognized the union. The campaign commenced in April 2021. Brands, Eastman, and the labor stakeholders commissioned an investigation by the Workers Rights Consortium, which corroborated allegations made by labor stakeholders regarding GBVH issues in the factory. The campaign included actions *locally* (engaging with the local office of the state Department of Labour, industry bodies, and management) and *globally* (engaging brands and other organizations; a media strategy). These actions ultimately resulted in H&M, GAP, and PVH agreeing to sign on, while also changing Eastman's stance.

One brand representative has suggested that the *Guardian* newspaper's coverage about Jeyasre was *pivotal* in getting all actors to take Jeyasre's death seriously. GLJ's role in getting the US CBP WRO order lifted after the agreement was, in the view of some scholars, crucial in further cementing Eastman's commitment in the establishment phase (Lebaron and Fudge, 2024; Gordon 2025).

The long and complicated campaign by the labor stakeholders to secure the agreement is an interesting story in and of itself, and a more detailed description of those efforts can be found in the above references as well as [here](#).

The specific design principles of the DA can be attributed to all three labor stakeholders, while some aspects draw from AFWA's safe circles approach, which can be seen [here](#). In general, the design involved three tiers. First was a shop-floor tier—through the establishment of shop-floor monitors who could focus on instances of gender-based violence. The idea is that low-intensity GBVH behaviors, if tolerated, escalate into higher-intensity behaviors, but that shop floor monitors could catch these low-intensity behaviors as

they occurred and minimize or stem the escalation. The shop-floor tier also necessitated a grievance procedure easily accessible to workers. The second was the labor-management tier, which necessitated FOA and regular linkages between labor and management. The final tier was the global one, involving the brands and global labor stakeholders that would provide global oversight.

In summary, the ecosystem created by the labor stakeholders and the institutions they designed have been important to the establishment and continued operation of the DA.

Eastman Management

Eastman is a large Indian apparel manufacturer with several factories in the Tirupur area, and owns the Natchi unit in Dindigul. Eastman's management has also played a significant role in the establishment of the DA. While Eastman, like other factories in the region, had been resistant to trade unions, it is important to highlight that that its commitment to the agreement was crucial to the successful establishment and later, institutionalization. As suggested by a member of the IC, this commitment was forged by Eastman's chairman but strengthened by a new director who possessed a deep understanding of global compliance requirements and senior VP of Quality Assurance and ESG (who served as the lead for the DA), both of whom who drove the changes. This commitment was also facilitated by a generational change in the ownership of this particular Eastman factory. The minutes of the Implementation Committee meetings and those of the labor-management meetings all highlight the high level of commitment and cooperation by top management at Eastman and Natchi.

As the TTCU president explained after it was recognized as the union, Eastman management worked jointly with TTCU to explain to the workers that were they to cooperate with both management and union, together they would prove that this was a good place for women workers, and that the brands would return. These statements by management were quite instrumental in the establishment phase.

Oversight Committee

Established under the brands-labor stakeholder confidential agreements, the OC is composed of representatives of institutional signatories to the

agreement: three from labor (AFWA, TTCU and GLJ); two from brands (GAP Inc and H&M)²⁶; and one from the supplier (Eastman). The committee is chaired by an independent human rights practitioner with 30-plus years of local, regional, national, and global experience in discrimination and GBVH issues. It holds a formal, virtual meeting every quarter, an annual in-person meeting each October in Dindigul, and meets virtually at other times when needed.

The role of the OC is to build consensus among the actors, determine how to talk about the agreement, and develop and commission external reports. It serves to resolve matters that have not already been addressed on the ground before they escalate and result in brand penalties on the supplier.

OC members are accountable to one another, breaking down the *us-versus-them adversarial role* that typically exists between management, labor and brands. As an OC member said, “We are able to have difficult conversations respectfully and hear diverse perspectives.” Another OC member offered the perspective that the OC is “most effective at the early stages of legally binding agreements when stakeholders do not know one another. The OC requires you to take a collective approach while recognizing each stakeholder comes into it for different reasons.”

The OC *has* faced challenges. For one, the OC Chair highlighted that not all the OC members can make decisions for the institutions they represent, which can slow down the process. Many members have had to constantly revert to their organizations, causing significant delays. Some stakeholders did not see this as a problem, arguing that it is normal for representatives to want to check with their principals or legal departments before making commitments. In addition, the OC’s official role is to address issues that cannot be addressed by the parties directly or through the Implementation Committee. In the view of one OC member, the OC has spent a lot of time and effort addressing *other* issues not quite warranted by this official role, and hence the member suggests there is a need for greater role clarity. Finally, at least two members of the OC felt that

their work and discussions would have been easier had there been a requirement that brands should *increase* sourcing from this factory if Eastman’s performance was positive—and that the OC might have facilitated that discussion beyond the agreements signed by the stakeholders. Note that the OC is prohibited from discussing the sourcing language in the confidential individual brand agreements.

In general, although OC members highlighted both positives and negatives, the different views of signatory stakeholders leads me to conclude that there was some agreement that if the OC was to be replicated in other places, a key lesson from the DA would be to invest the OC with greater authority to make fundamental decisions, while ensuring that all OC members have the authority to take decisions on behalf of their organizations.²⁷ As an AFWA representative noted, “It would not be wise to get rid of the OC since it brings brands, suppliers, and labor together into the agreement, given that the garment industry operates within a brand-driven global supply chain context.”

Implementation Committee (IC)

It consisted of senior management of Eastman, the TTCU president, and two non-resident representatives of AFWA, although meetings minutes show several others in IC meetings at different times. The IC was crucial in the establishment phase of the agreement, and less so during the institutionalization phase, as detailed below. The IC established systems that linked Eastman’s corporate structure with the Natchi local management. In 2022–2023, the DA’s first year, it provided a forum for Eastman management, AFWA, and the TTCU to incubate the union-management mechanism and provide guidance to local management. It worked in particular to stabilize labor relations, which were uneven across different departments. The IC worked with AFWA, TTCU, and the DA program staff to put in place the system for documentation, which is the source of the data (reported in Section 1) to monitor DA performance on an ongoing basis. In sum, the IC built the industrial relations mechanisms of the DA, and resolved issues that could not be resolved at the local union-management level.

²⁶ PVH Corp is not a formal member of the Oversight Committee. It has attended meetings, however, mostly in 2025.

²⁷ As an independent researcher who is not privy to what happens in the OC, I am dependent on OC members views about what the OC does and what challenges were faced. It was surprising to me that in the feedback on the first draft, different signatory members had different conceptions of the purpose of the OC!

The IC met three times during 2022, with the objective of ensuring the establishment of industrial relations systems at the factory. The first meeting focused on general issues of commitment to the DA, and the second meeting focused on a training calendar and selecting its permanent members. The third meeting, also attended by many union and management representatives, focused on the reconstituting representative factory committees, establishing “points of contact” at each factory unit, and selecting transport monitors.

The three meetings in 2023 continued to focus on implementation topics, but also became a forum where the parties could speak frankly about many other issues. IC members discussed several operational issues regarding problems in implementation, such as the “initiation, progression, gaps in the implementation, areas of concern, unforeseen issues.” In early 2023, the IC discussed the decline in orders for Eastman generally, the significantly chilling effect of the Guardian newspaper reports, and that other brands were hesitant to source given that H&M had not renewed its sourcing. Another sourcing issue discussed was Disney’s revocation of Natchi’s licence to produce for Disney and AFWA offering to intercede on Eastman’s behalf with Disney. An important highlight recorded in the minutes of one meeting is that AFWA and Eastman Exports *intended* to sign a “Memorandum of Intent (MoI) to extend the Dindigul Agreement across all Eastman factories. The aim is to prevent and safeguard workers from Gender-Based Violence and Harassment (GBVH) and to spearhead the establishment of strong grievance mechanism” (extract from IC meeting, March 7, 2023). Other operational issues included changes to Eastman’s workplace sexual harassment policy to be consistent with the DA, and establishment of a new ICC in the spinning mill.

The three meetings in 2024, which took considerably less time than those in previous years, drifted away from specific operational issues to more review, evaluation, and planning. While the first focused on a specific case of GBVH in spinning, the second was a very brief program review. Minutes of 2024’s final meeting minutes report discussion of higher-level issues such as “the upcoming renewal and possible extension of the Dindigul Agreement beyond October 2025, the lack of sourcing commitments from signatory brands and the year 3 comprehensive

report. Management expressed concern that requiring new brands to sign onto the agreement could seriously deter both current and potential buyers of Eastman, but they nevertheless reaffirmed their commitment to continuing the work in collaboration with TTCU.”

The IC’s February 2025 meeting had a brief review of program activities, a review of activities planned for the final six months of the DA, a discussion of a new training module for SFMs, and discussion of the implementation of the ICC recommendation in a recent GBVH case in the spinning mill.

In summary, the IC’s early focus was the establishment of systems to better implement the agreement, which labor and management may not have been able to do acting alone. In later years, it has become more of a review forum and a place for the parties to discuss issues beyond the narrow scope of administering the DA. As the agreement has become more institutionalized, with the union and management acting autonomously to administer the DA, the role of the IC is less central than it was in the early stages of the DA.

Institutionalization Phase

The other actors shown in Figure 4 have played more prominent roles in the institutionalization phase, on a day-to-day administrative basis now that the DA is better established. Note further that the DA’s design required the appointment of program staff, paid through the DA, who play a crucial role in implementation. We have already discussed training (which is continuous and incident-based) and counseling earlier in this report, and I have documented evidence in Section 1 that training has increased awareness of GBVH, while counseling is crucial to survivors of GBVH in terms of catalyzing action. Both are important institutions that are essential underpinnings to any agreement seeking to end GBVH in any institution.

Program Staff

The program staff, paid by the DA, constitutes a smaller institution than others in the DA, but is an essential cog in the wheel. There are two program staff: a program associate and a documentation officer, who is responsible for documenting all grievances and union-management discussions. Accurate documentation is

key to all further steps in the grievance procedure, in union-management discussions for grievance redressal, and even in cases discussed in the ICC. One member of the program staff accompanies the TTCU during the bi-weekly visits to the factory. The program staff is also the source of all the data stakeholders need to monitor the progress of the DA. The union and management both work closely with the documentation officer, as both parties have an interest in accurate and reliable data. The program staff are supervised jointly by the TTCU and an off-site project coordinator appointed by AFWA. This coordinator is physically present at the factory during IC and OC meetings and serves in a liaison role. There is widespread agreement among interviewees that the program staff have been essential to the DA in terms of generating the data stakeholders need to monitor the progress of the agreement.

While the program staff has been essential in the DA context, would they be required in other contexts? The labor stakeholders argue that it is essential for program staff dealing with GBVH to be *independent* from management, in order to properly fulfill their role. In the DA case, the program staff function effectively given their close working ties to the union, and also given the high level of union-management collaboration. If the DA were to be replicated in other factories with collective bargaining agreements in place, would independently paid program staff be as necessary? Although factories with collective bargaining agreements are rare in the Indian apparel context, Li, Kuruville and Bae (2024) show that that 15.5% of 1983 apparel factories that participate in the ILO's Better Work Program in 7 countries have well-functioning CBAs in which unions and management can jointly examine the data. Hence, whether DA program staff need to be appointed and paid independently, versus having company-paid employees do the work, may depend on the context.

Shop Floor Monitors

These *workers* play a key role at the shop-floor level in the multi-level DA. AFWA prioritized SFMs in the DA in order to implement its Safe Circles program, the central feature of which is to have worker leaders on the production floor training co-workers and helping them report GBVH. Workers volunteer to be shop

floor monitors or are encouraged to take on the role by union or management or even the ICC, but the TTCU has the right to select SFMs under the DA to ensure that that they are independent and not appointed by management.

The SFM group receives more intensive training than the general GBVH training. As one stakeholder noted, "GBVH training is a necessary condition but SFM training is crucial." SFM training includes modules on communicating with people in positions of authority.

The difficulty of isolating SFM contributions to the DA is that the data are incomplete. The SFMs call out instances of GBVH as they happen on the shop floor, consistent with the AFWA's notion of catching GBVH before it escalates to more intensive levels. Many issues are resolved before they become formal grievances and many issues raised by SFMs may not be listed as grievances by workers but are resolved through union-management discussions. SFMs also bring forward other issues to the union and/or management.

Most stakeholders agree that the SFMs are an important cog in the DA wheel. An AFWA stakeholder mentioned the quality of SFM leadership, and an ICC assessor said "SFMs are a good group."

Our interviews with SFMs were revelatory. We found the SFMs to be a very confident, outgoing group with a good understanding of GBVH. They take great pride in wearing their yellow coats. They showed no hesitation in pointing out issues on the shop floor, and more than one indicated that they had the confidence to act in the absence of the TTCU president. One stated, "We are in a position to help our fellow line workers. We can solve their problems, especially for the ones who do not speak Tamil here."

SFM's function well in this factory. Many stakeholders agreed that SFMs were a crucial element in combatting GBVH in the factory. One of the representatives of the brands indicated that SFMs constituted an institution that "we would happily transplant to other factories." The HR manager at Natchi, who works closely with the union, informed us that the SFMs "are taking the lead, and if I had to do this elsewhere, I would definitely introduce the SFM system—and not just for GBVH." It should be noted, however, that SFMs' effectiveness is

due in part to the existence of a union and a functioning labor-management relationship. It appears more workers are interested in becoming SFMs.

Internal Complaints Committees (ICC)

ICCs are required under India's Prevention of Sexual Harassment (POSH) Act 2013 to address GBVH complaints. The POSH Act requires that 50% of the ICC members must be female, with a senior woman employee as chairperson along with one external independent assessor and at least two other employees. Per Tamil Nadu rules, ICCs must meet six times a year.

In general, ICCs in India and in garment factories have been criticized as being mostly "check-the-box" institutions, with workers unaware of the ICC's existence. ICC members are supposed to be chosen by workers, but in many factories the worker members are appointed by management. In these respects, the ICCs at Natchi are truly exceptional. The DA required that ICCs be reconstituted and integrated with the grievance system so that it could work more effectively in compliance with national and state regulations.

The Eastman factory has a total of six ICCs. I studied the ICC in the Natchi apparel unit, which minutes show had attendance at meetings that varied from 5 to its full 8 members. The typical meeting lasts 1.5 hours. One of the independent assessors on the spinning ICC (who doubles up as a trainer for ICC members, and counselor for the workers in the spinning mill) explained that the typical ICC meeting of 1.5 hours begins with any new GBVH cases. Then members are asked whether there are any others they have heard about. The bulk of the time is spent discussing potential solutions, including why some of the solutions are more appropriate than others.

We met individually with the external independent assessors of ICCs at Natchi and the spinning unit, the HR manager, the TTCU president (who regularly attends ICC meetings), and with a group of ICC worker members. The ICC at Natchi not only exceeds the POSH Act's minimum requirements but, as detailed below, has helped create an educational "discourse" about GBVH that expands workers' understanding.

Both independent assessor members of the two ICCs are prominent figures in womens movements with long

experience in gender issues, locally as well as globally. One of them described the conversations in her ICC as "free flowing."

ICCs discuss only GBVH complaints and issues. The Natchi ICC is interesting in that it focuses on *unresolved* GBVH cases. For example, a harasser was moved to a different unit as a result of the grievance resolution process, but that did not solve the *underlying* problem, since it is possible that that harasser could continue harassing in the new unit as well. In this case, the ICC recommended complementing the transfer with counseling for both the woman who filed the complaint and the accused manager. An independent assessor noted that the "POSH act is unforgiving with regards to complaints against men—a complaint is enough for them to lose their jobs."

In some of the cases involving male management staff, the Natchi ICC has made some important recommendations such as transferring them to different departments or units, most of which have been followed by the management. Whereas the POSH act requires only that management *consider* recommendations from ICCs, the DA includes a clause stipulating that management *must* accept and implement decisions taken by the ICC—although there is some room for negotiation, and management sometimes proposes alternative that are functionally equivalent but easier to implement.

Since unresolved GBVH issues are rare (see our GBVH grievances section), the Natchi ICC focuses on broader GBVH-related topics, such as how to think and talk about cases, how workers interpret different cases, and so on. Cases become teachable moments. A lot of time is spent discussing the concept of "consent": what constitutes consent and a consensual relationship and whether a so-called "consensual relationship" actually involves some degree of coercion given different power dynamics. The committee also discusses whether it should be morally policing purely consensual relationships.

We interviewed ICC worker members who were able to articulate clearly their understanding of consent. "It is not a formula; one has to look deeper," said one. Workers indicated that they try to dig deeper to see what

behavior is acceptable and what is not, and whether the other person likes or dislikes the behavior. “We have to try to separate the truth and the lies,” said another ICC member. “We have to understand how much of it is verifiable, what is correctable, how do we be sensitive, and then we have to factor in context that includes physical, emotional, and geographical factors. We can understand consent and things like that only after that.”

One of the examples offered was of a male mechanic who was being verbally abusive to his girlfriend on the phone. Other women complained about him to the ICC. “But, it is not appropriate for us to be demeaning and punitive in that case,” one of the explained. “We do not believe in that, or in threatening. We try to be friendly and explain things in a simple manner. For us, the punishments are based on the levels of escalation of GBVH: whether to shift to a different line, unit, or factory, or to absolutely fire that person.” one of them explained.

Both ICCs spent a lot of time was spent on the dangers of “moral policing” and “gossip” about co-workers, which appears to be quite a problem in this workgroup. One of the counselors opined expressed the view that “ICCS reduce moral policing, reduce bullying, and educates its their members regarding notions of “power’.” In the opinion of a union representative, “ICCs can be made better if factory management is not present, but only the external assessor. That said, ICC’s in this factory work better than most.” Per the Posh Act, ICC’s have to be chaired by a female management representative.

One of the external independent assessors indicated that it is too early to judge the impact of ICCs at Natchi, that it takes 3 to 5 years at least to get the nuanced level of discourse necessary for the whole workforce. For this assessor, success of the ICC should be in seen in shop floor monitors showing a good understanding of GBVH, and in a general reduction in “moral policing.” The latter is important because moral policing incidents may not be taken seriously: “she acted provocatively and therefore the supervisor hitting on her was not GBVH,” for instance. Further, since the law requires that ICC members rotate off every two years, a new group has to be trained. She suggests that some members should continue for a while on a longer rotation.

In summary, ICCs perform an important function in this factory, both in terms of dealing with GBVH complaints

that cannot be handled through the grievance procedure and by educating workers more broadly about GBVH. Since ICCs are required by law, their recommendations carry weight, and it generally behooves factory management to comply.

TTCU, Eastman Factory Management and Union Management Dialogue

I discuss these institutions together because it is difficult to disentangle their contributions with regard to the institutionalization of the DA. The productive union-management dialogue is a direct result of the DA and the efforts of both the TTCU and Eastman management to build a collaborative relationship.

The TTCU continues to play a key role in the institutionalization phase of the DA. While we have discussed the TTCU earlier in the context of FOA and labor management relations, it is useful to highlight here the high degree of trust workers have in the union and the sources of that trust. As a brand represented noted that the “*TTCU has performed a hard lift and has the confidence of the workers—they found a voice through her and got empowered.*” I have already explained the legitimacy gained by the union through its work in the community on GBVH, and specifically in the aftermath of Jeyasre’s death. But that is not the only reason.

It is the community basis of the union that elicits trust, loyalty and confidence, and their work in the factory has built on that. The trust in the union is also enhanced because there is a level of political independence---they are an independent union with an independent voice and not closely identified with other parties or unions. The TTCU maintains connections with various local and regional institutions. For example, much of the TTCU’s work on solving workers problems with their Provident Funds (PF) and Employees State Insurance (ESI) claims (more than a 1000 cases) is predicated on the relationships that they have built with the relevant EPF and ESI offices and senior officials in those offices, as well as with the doctors, nurses and ambulance at the ESI hospital.

Beyond handling GBVH issues in the community, they are active through their members in the village panchayat, and help workers raise a number of issues. The TTCU has facilitated the election of more than 170 women leaders to ensure that local bodies ensure

stronger female representation in the village panchayats. The TTCU has worked hard to enhance Dalit women's leadership while also building solidarity among women of different castes in the community, as our community interviews revealed. In fact at the village meeting we attended (where the women were mostly garment workers in several different factories), women testified to how the TTCU has helped village committees on many different issues—such as ration entitlements, government subsidy for housing and various individual issues such as obtaining more compensation for a soya oil mill worker who died in a fire accident at her work, the school expense support from the state, or obtaining certificates to get the free sewing machines from the state government.

With regard to the free sewing machines issue, one person noted in the meeting, “*Earlier we were working as coolies or agricultural workers, now we can take up stitching orders from the comfort of our household without going out in the hot sun.*” Another worker from a spinning mill said, “The seniors were deducting money for 2 hours per day despite my presence. Now that I have TTCU's support, I have had the courage to question them on these things and stop things like this from happening.” Other women added that they have seen major changes with discrimination and seen improvements in many areas.

The TTCU's feminist empowerment work is crucial to its support. As another villager said, “We should not depend on a man for our income. Ultimately, I know I will feel proud if my children know that I also pay for them and it is not just their father who is supporting them. That is what gives me joy and reputation in my life.”

When we questioned villagers about what they would do without the help of the TTCU president, we got this response: “We can do things even if we are not in the village committee. We can do things ourselves. We have that confidence now.”

An AFWA representative made the point that the TTCU's strength is its deep roots as a community organization of women garment workers. Before the DA, the TTCU had been active in the industry, handling legal cases for

workers connected with factory closures, challenging the illegal use of pills in factories to delay women's periods to enhance productivity, and dealing with cases of GBVH in other factories. The DA facilitated the TTCU's entry into the Natchi factory as a formal representative union.

In summary, the TTCU is an effective organization because of its *hyperlocality*. It is rooted in workers' communities, the local area and institutions, and the factory. This hyperlocal aspect needs to be taken into consideration when replicating this agreement. A brand representative mentioned that there are few unions in the area that are politically unbiased, but the TTCU is an ideal case: a worker-centric union that takes a balanced approach, provides workers with a voice, and understands the nature of the grievances well. It should be noted, though, that the migrant workers do not experience the TTCU in quite the same way as local workers.

Similarly, Eastman factory management's role is crucial to the DA's implementation. Both the HR manager and the Senior VP of Quality Assurance and ESG (who is responsible for the DA) have completely internalized both FOA and the prevention, remediation and elimination of GBVH, and are comfortable dealing directly with workers, knowing that they will *not* be seen as undercutting the union because of the extraordinarily high level of trust between management and the TTCU. The TTCU president and HR manager are in close and regular contact, but on the rare occasions that they are unable to resolve problems, the TTCU approaches the Senior VP directly and, invariably, the problems are resolved.

Most stakeholders we interviewed mentioned the quality of labor-management relations. A GLJ representative highlighted the “reasonably mature industrial relations” at the factory; a senior AFWA representative spoke of the quality of “union management dialogue”; and a former member of AFWA, now independent, mentioned “union management trust is really good.” A brand representative spoke of the “continual engagement” between TTCU and management.²⁸ As one of the independent assessors “it is really important to highlight the role of Sakthi [Saravanan, the HR manager] and Thivya [Rakini, the TTCU president]—they are the linchpin of the DA today.”

²⁸ Signatory stakeholders differed in what they attribute as the key cause of positive labor-management relations at Natchi. Some say it is due to a change in Eastman leadership. Others give more weight to the work of the labor stakeholders to get the WRO lifted. It is possible that both are important.

I have highlighted the role of different institutions in the DA, but it is also crucial to highlight the intangible arrangements that are key to successful institutionalization. While institutions have always been most important in labor-management relations, the influence of strong, dynamic personalities (e.g., John. L Lewis, head of the United Mine Workers in the United States from 1920 to 1960; Arthur Scargill in the Britain, who was president of the National Union of Mineworkers from 1982 to 2002) have received considerable scholarly attention. In this little corner of Tamil Nadu, a brand representative noted the importance of the TTCU president's dynamic personality as well.

Question 2: Summary and Conclusion

This section of the report has described the DA's institutions, some of which, I argue, are more important than others at different phases. The formation of an agreement between labor and management in the apparel industry might be triggered by several different factors. Some have required campaigns in the aftermath of unfortunate events. In the DA case, it was necessary for global actors to be involved given the circumstances of the case, and for an OC to oversee the DA. In addition, given that industrial relations were not well established at Natchi before the DA, institutions such as the IC played an important role in the early stages.

The argument stemming from my analysis in this case is that once established, a lot depends on how local actors work to institutionalize the agreement. Hence, how the actors and institutions at the local level work—including shop floor monitors, ICCs, grievance procedures embedded in a collaborative labor-management relations context—may constitute the more enduring lesson of the DA.



QUESTION 3: REPLICABILITY

The DA is touted by many as a “model” for the apparel and other industries, and so the question of whether it is fiscally sustainable and its institutions could be replicated elsewhere and produce the same result is worthy of consideration. These factors may also be important in the scaling of the agreement (addressed in Section 4).

*My interviews with stakeholders reveals **two major themes** connected with replicability. The first, raised primarily by some brand representatives, focuses on the cost of the agreement and whether brands could invest in replicability on a factory-by-factory basis. The second concerns whether the institutions and policies are replicable in alternative contexts. To add some empirical content to the differing views of stakeholders on the latter point, I examine some recent nascent replication efforts in light of the factors that created success in Dindigul.*

To my knowledge, there is only one publicly announced agreement, the Central Java agreement, which is inspired by the DA. Three other replication attempts are underway at this writing, but the stakeholders of one of them did not provide permission for it to be discussed here as it is still in the early stages.

*To assess replication, I ask a simple question: Do the features that have led to success in Dindigul exist in the new replication? A better question would be to assess **whether replicated institutions provide the same results**, but since the best-known replication –the Central Java agreement, is still in its nascent stage (the agreement having only been signed in October 2024), it is still too early to determine how that has facilitated the addressing of GBVH in the factory.*

The Cost of the Agreement

Many stakeholders mentioned **cost** as an important factor to be considered for both replicability and scalability. Certainly, any brand interested in signing on to an Enforceable Brand Agreement in respect of GBVH will require a precise answer regarding the true cost of an agreement such as the DA. Unfortunately, I cannot shed light on real operating costs. DA financial data are not published, and I was not provided with access to the data.

We know that the total contributions from the three brands that signed the agreement was \$300,000 for the duration of the agreement.²⁹ Brands transferred funds to GLJ. Eastman was not required to contribute anything

financially to the DA *per se*, although it contributes substantially in terms of management and worker time—grievance administration, IC, ICCs, and so on take time away from production. Absent operating cost data, the \$300,000 contribution should be considered an upper bound on cost.

Some signatory brand representatives argue that this is a significant cost from a replicability and scalability perspective. Each brand has large numbers of suppliers. As of May 2025, their corporate websites indicate 1,100, 737, and 900 first-tier suppliers for H&M, GAP Inc., and PVH Corp., respectively. Replicating this agreement in many factories at the same cost as the DA contributions would constitute a large financial burden. As one signatory brand representative stated, “the cost to the

²⁹ Two brands each contributed \$25000 per year for three years, while the third brand contributed \$50000 per year for three years.

company was the amount paid, in addition to the staff time in attending meetings and the travel expenses to Dindigul every year, both of which were high, particularly for a factory that was not even in our supply chain.” Further, not all brands have pockets as deep as these three, so the cost would become an even more significant issue for other companies considering this type of agreement.

Cost also needs to be understood in the face of alternatives. Signatory brands may prefer to engage in alternative programs to address GBVH, such as RISE or the TIC, or in other initiatives such as the Pakistan Accord (which also includes GBVH), which afford the *possibility* of scaling.³⁰ Given that the fee structures for participation in these initiatives vary across brands, it is impossible to gauge the cost of alternatives.

One perspective from the stakeholders regarding cost is to conceive of the DA as a “pilot project”—a demonstration effort that has involved some degree of experimentation and therefore required a high initial cost. Replications are thought to be likely both less-expensive and faster. For example, a GLJ representative suggested that the minimum requirements for new programs would include the documentation officer, counselors, and the cost associated with the OC. Other institutions such as training programs, which have now been perfected at Dindigul, could be paid for by factories interested in addressing GBVH, as could the costs of training shop-floor monitors. A labor activist who worked earlier with AFWA and has some knowledge of the DA’s provisions agreed that lower-cost replications were feasible if the TTCU were to do the training, given the union’s expertise. She also felt that the documentation officer was a necessary institution, but that the cost could be borne by the factory. The cost of an independent assessor should not be factored in (in India) given that is a legal requirement, although hiring a good one (in short supply) may cost more than what suppliers have currently allocated. In summary, the views are that replication at a lower cost is feasible, and especially so in factories with collective bargaining, that will enable them to solve problems at lower levels through SFMs.

An outsider perspective raised by an independent assessor is that “DA has made significant strides: it

addresses GVH through FOA, addresses GBVH in both homes and workplace, has increased awareness on GBVH issues, has a successful grievance redressal system for women workers and resolution within a fast time period, and has influenced and changed men’s behavior. From a holistic approach, for a model that delivers such diverse and vast impacts, it is not a significant cost.” The argument here is that this is a small price to pay for the outcome of preventing, remediating, and eliminating GBVH at work and at home.

The cost will also reduce substantially if more brands source from the factories, but that has not happened in the Natchi case. As an AFWA member claimed, “Brands currently have ineffective programs to improve labor conditions and end GBVH—we can make it cheaper—more brands will participate as the consolidation of supply chains continues, providing labor stakeholders with more leverage for programs such as these.”

Stakeholder Views on Replicability

Stakeholders offered a variety of perspectives on replicability. All the labor stakeholders feel that the DA model *is* replicable and *should* be replicated, keeping in mind sourcing needs. An Eastman staff member suggested that replication in the local leather industry could be attempted.

A representative of one brand argued that the DA was probably replicable in terms of design principles, “but in order to get the results that we have here, you are going to need an extraordinarily collaborative labor-management relationship. Having a union that is so embedded in the local community that workers trust in the union is absolute, which also makes it impossible for the management to be non-collaborative.”

An independent assessor noted that it was “a tragedy and trauma that started it. Almost every innovative agreement in the garment industry has been triggered by a trauma. It is not easy to replicate it without a trauma.” Another staff member opined that “it is not easy to replicate this agreement in other suppliers in the area, because they see having an agreement as a sign that there are problems in the factory.”

30 RISE, TIC, and ACT are described more fully in Section 4, where scalability is discussed.

A brand representative hypothesized that replicating such an agreement locally is difficult because even though there are other unions in the area, none are as well organized as the TTCU and overall union presence is quite low. A commonality in most views was the centrality of union-management relations in the success of the DA. As a senior brand representative noted “For work on GBVH and FOA to be successful, the Dindigul Agreement has shown the value of stable labor-management relations with a strong union.”

DA Lessons for Current Replication Efforts

It stands to reason that if the DA is the inspiration for replications, we should examine whether the conditions that have created success in the DA are present in other cases. The only case that has been publicly “released” is the Central Java Agreement for Gender Justice (CJA) that has been announced by GLJ, AFWA and the Workers Rights Consortium (WRC) and can be read about in a fact sheet here. There are others in process, some coordinated by AFWA and GLJ, but they are not yet public. I also discuss two nascent replication efforts in Tirupur, which I refer to as Replication Attempts 1 and 2, but these are in the very early stages.

Central Java Agreement:

As can be seen in the [fact sheet](#) on the CJA³¹, the agreement covers two factories owned by Ontide that produce university logo apparel and other products for a US-based brand called Fanatics and, under licence, some Nike-branded apparel. The agreement came about in response to the discovery of a pattern of sexual violence in one factory documented by the WRC in 2022—a trigger broadly similar to the DA case. Similarly, the Fanatics brand sourcing from these factories is reputed to be progressive, just like the signatory brands in the DA. AFWA, GLJ and the WRC are signatories to the agreement. It imitates the DA in terms of institutions such as the union appointed SFMs, similar GBVH definitions based on ILO Convention 190, a multi-channel grievance system, and training for all workers. It

provides for regular dialogue among local unions, global stakeholders, Fanatics, and Ontide—roughly similar to the role played by the OC in Dindigul. The agreement also provides for the creation of GBVH elimination committees that will investigate GBVH grievances, with AFWA, GLJ, and WRC designating committee chairs. These GBVH elimination committees are designed for similar purposes as the ICCs in the DA, although the latter is a legal requirement.

One difference with the DA is that the CJA is an agreement between Ontide and four different unions, three operating in one of the factories (PT Batang) and one union at the PT Semarang factory. A second difference is that these Central Java factories have existing collective bargaining agreements, whereas it was the DA that brought the TTCU into the factory. Thus, while the DA is a case where the EBA was necessary to obtain FOA/CBA, in the Central Java case, the EBA is designed to supplement and strengthen the existing CBA with GBVH provisions.³²

What can we learn from the DA that might inform how the Central Java Agreement will work? It is too early to address whether the CJA institutions have resulted in results similar to the DA, which would anyway require on-the-ground research, but we can *from a replicability perspective, ask* whether the factors created success in the DA exist in the CJA.

The establishment phase of the Central Java Agreement is broadly similar to that of the DA, and there is some similarity among actors (in fact, AFWA and GLJ are the same), and the institutions are similar in design. It is possible that these similarities will result in actors and institutions combining in ways that lead to similar results. As the fact sheet acknowledges, the CJA has incorporated lessons from both Lesotho and Dindigul, and AFWA suggests that the labor stakeholders have devoted time to contextualize the terms of the agreement to fit local laws and customs.

There are five major features of the DA that are responsible for its success, and it is relevant to ask

³¹ Note that studying the CJA was outside of the scope of this research, but is discussed here because of its significance as a public example of replicability.

³² GLJ communicates that Indonesian legislation (Manpower Law 13/2003) and the Omnibus Law on Job Creation (2020) have diluted CBAs in scope and enforceability. And Central Java is an area with lower wages and less-established labor power compared to Greater Jakarta. In this context, even unions with CBAs tend to struggle to advance worker rights. Hence the need to introduce GBVH through an EBA that will strengthen the existing CBA.

whether they exist in the CJA, since that may provide a clue to replication success. First, as demonstrated in the DA case, so much hinges on the quality of labor management collaboration at the factory, and all DA stakeholders acknowledge this as crucial to its success. While both factories in the CJA have established collective bargaining relationships, including the bipartite cooperation institutions that are required by Indonesian law, I found little published research regarding the *quality* of labor-management collaboration at these two Central Java factories. To be sure, these long-established bargaining relationships may provide a strong foundation for high-quality labor-management collaboration. Field-based research is necessary to investigate this issue.

Second, whereas the DA has only one union, one of the CJA factories has three unions. It is well established in industrial relations that multiple unions in the same workplace is often a recipe for inter-union conflict, which is why the law in most countries requires a single bargaining agent in every workplace. India and Indonesia are notable exceptions to the requirement of single bargaining agent rules. There is decades of scholarship highlighting inter-union rivalry in India as a significant inhibitor of labor-management collaboration, as unions compete for workers to become members of their union (Ramaswamy 1989, Kuruvilla 1999, Bhattacharjee 2001).

It is also well established in the literature that there are ideological differences that impinge against cooperation between major Indonesian national union federations (Asgani 2024, Caraway and Ford 2020).³³ However, ideological differences at the national level still leaves ample room for regional and local collaboration as workers share the same material conditions and their collective action could build solidarity. And in the PT Batang factory, the three unions are joint signatories. Hence, the problems associated with multiple unions with different ideologies representing a single workplace may not be reflected in this case. This, too, requires additional research.

Third, the rootedness of the TTCU in the workers' communities is one reason that workers in the DA have

high levels of trust in the union. This level of trust is enhanced through the union's associational rights under the DA, which has contributed to workers trust in the grievance procedure. The TTCU has been active in the communities on GBVH issues for a long time, which gives the union legitimacy that is difficult to earn. It is unclear whether there are parallels in the case of the unions in these two Central Java factories, as there is little published research. AFWA argues that the factory-based unions in Central Java are composed of workers and leaders from their local communities and, therefore, members' confidence and trust in the union could be high. Again, this is a subject of future research.

Fourth, a key success of the DA is that it has a women-led union representing women workers, and hence the importance and urgency of GBVH is always salient to the leadership. The DA has shown that female leadership is far more likely to address the links between GBVH at the factory and at home, and hence it is highly relevant to attempts to replicate. There is no publicly available information in the fact sheet regarding the nature of the leadership at the three unions in these two Central Java factories, the legitimacy they may enjoy, or whether the leadership is female. AFWA suggests that the unions in the CJA are composed of both men and women, and while male leaders tend to hold important official positions, there are also women leaders and the GBVH elimination committees are composed mostly of women. That is yet another subject for future research.

Finally, the TTCU's remarkable access to the factory and the collaborative relationships between the TTCU president and top management at Eastman (both the Senior VP and the head of HR) are crucial factors in the DA's success. This came about once the TTCU obtained recognition as a result of the DA. In the CJA case, there is an existing collective bargaining agreement, and AFWA suggests that the local factory union leaders have access to the senior leadership of the two factories and to Ontide, the owner, as well as to brand representatives.

In summary, as I argue earlier in this report, the Dindigul agreement works because of a series of "hyperlocal"

³³ Unions in Indonesia are organized at multiple levels. Five factory-level unions can combine to create a union federation that is usually industry-based; examples include Garteks (the garment and textile union) and FSPMI (the metal industries union). These union federations can, in turn, combine to create multi-sectoral confederations. They can also affiliate with existing multi-sectoral confederations. There are currently 21 such confederations in Indonesia, including the KSBSI, KSPI, KSPSI, and KASBI.

factors. AFWA makes the argument that the CJA has functionally equivalent hyperlocal features. Whether they will produce similar results is the main question for future research.

Replication Attempt 1:

This is a more recent replication attempt that is spearheaded by the TTCU. Again, since there is no public agreement, I am not at liberty to disclose names. An international brand that sources from some factories in Tirupur was connected with the TTCU in 2024. Since the brand appreciated the principle that success in the GBVH sphere depends on local-led solutions, it has given the TTCU relative freedom to conceptualize its own approach to solving the GBVH problem. At present, the brand has connected TTCU to one of its supplier factories, which has been designated as a pilot for the TTCU's efforts.

The TTCU has met with the workers and management together as a means of establishing trust. Training of workers has begun, and organizers are now engaging with the villages where the workers of this pilot factory live “to build trust and get a deeper understanding of their issues,” as the TTCU president put it. In addition, TTCU is working with management to strengthen internal committees at the factory. Although this is still in the early days, an interviewee noted that “there is a high degree of trust between supplier and union—both parties are approaching the process in good faith, which is helping to lay a promising foundation.”

Replication Attempt 2:

This attempt, which began in late 2024, also involves the TTCU and a European brand, intermediated by a multi-stakeholder institution. There is an ongoing pilot in one of the factories from which this brand sources. Here, the TTCU is conducting training for both workers and factory management. The union has supported the reconstitution of worker committees, including an internal committee, and helped members of this committee to better understand their roles and responsibilities. The TTCU has also facilitated the selection of shop-floor monitors, who are now undergoing training by the union.

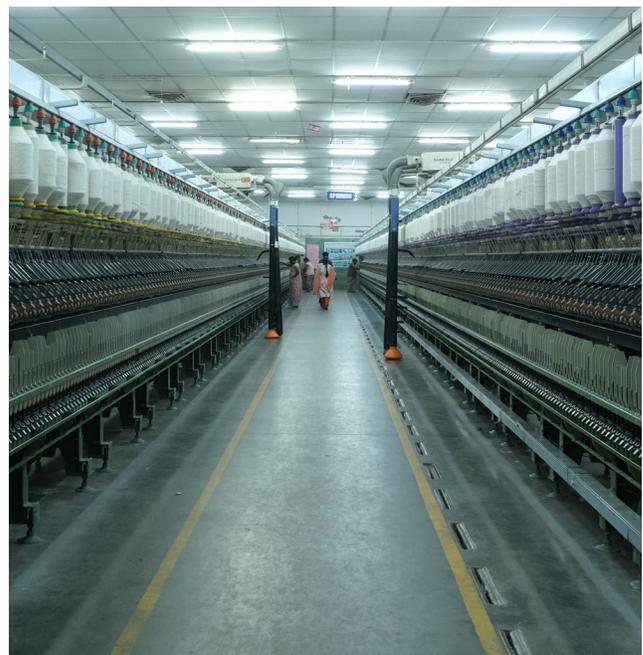
A commonality across both replication attempts is that they are currently “non-agreement models.” But in both

cases the union is engaged as a trainer and trusted partner.

There are two important features of these two replication attempts. The first is the assumption that GBVH interventions need not always be reactive or grievance-driven. Rather, the brands here see FOA and union engagement as part of a *preventive* approach—building trust, increasing worker awareness, and establishing worker-management dialogue *before* a crisis emerges. Second, as an activist connected with these attempts indicated, this is an “important and strategic pathway” to the prevention, remediation and elimination of GBVH because, in Tirupur, “unions are often viewed with deep suspicion: as corrupt, politically compromised, gender-insensitive, or anti-business. This slow, practical engagement has the potential to reshape those perceptions over time.” These attempts thus open up new, constructive roles for unions even in highly anti-union environments.

Question 3: Summary and Conclusion

In summary, there is a need for more replications, as well as studies of those replications, to assess whether DA-type institutions (Figure 4) , even without *all* the DA attributes (the factors that make it successful) will produce DA-type results.



QUESTION 4: SCALABILITY

There are more than 200,000 apparel factories worldwide in which women workers dominate. Given that GBVH is a global problem, a factory-by-factory approach is insufficient. The DA is an important “proof of concept”—a necessary step before other scalable approaches can be designed. A brand representative put it in these terms: “Replication is really the wrong question. The right question is ‘evolution’—where do we go from here?”

The key question is what to scale to? I take a geographic approach here, asking first the DA can be scaled to other factories in Dindigul, and then to Eastman factories in nearby Tirupur, and then to the entire Tirupur garment cluster. For my discussion of scaling to other Eastman and to the Tirupur area more generally, I draw heavily on interviews with Eastman, TTCU, representatives of all stakeholders, as well as local activists and journalists. I draw on extant research and interviews with brand representatives, some of whom are participants of ACT and ACCORD, to assess whether the DA can be similarly scaled and from a representative of RISE and a representative of TIC with respect to the voluntary initiatives.

Scaling in Dindigul

Given that the TTCU is organized in Dindigul, it could be possible to scale the DA to other factories in Dindigul. The DA has demonstrated that it takes a global ecosystem to bring global brands and local factories to the bargaining table. With the experience gained through the DA, however, unions such as the TTCU may be able to pursue similar initiatives on their own as well, as can be seen in the nascent replications discussed earlier.

Scaling at the Eastman Level

The logical point of extension of the DA is to examine whether it could be introduced in Eastman factories generally. In fact, the minutes of one of the 2023 IC refers to a “Memorandum of Intent to extend the DA across all Eastman factories.”

As an interview with an Eastman representative revealed, “We did think of trying to introduce the DA to the rest of Eastman and to the rest of the industry, but we changed our minds as we talked to more factories.” The main reason advanced for this change of mind was that conversations with other factories and other brands sourcing from Eastman made clear that many were

“spooked” by the *Guardian* article. In management’s estimation, the company would lose half its customers if the DA was introduced in the other factories, in part due to an agreement implying the existence of a problem. This representative suggested that this could change if there new narratives developed based on the DA’s success was highlighted in relevant media. As he suggests, it is a testament to the power of the *Guardian* story that not a single UK-based brand is sourcing from any Eastman factory, despite that Eastman is one of the larger suppliers in the Tirupur garment cluster. I have no way of verifying these speculations but export data published in a March 2025 Fortune India report shows that the United States accounts for 35–40% of Tirupur exports, the EU accounts for 35%, and Canada and the Middle East combined account for 10% of exports. Very little, if anything, is exported to the UK from Tirupur. The India-UK Comprehensive Economic and Trade agreement signed in July 2025 might stimulate change in these numbers.

Scaling to the Tirupur garment cluster

From an industrial relations standpoint, an industry-wide bargaining agreement in a particular region is

often the best solution to impose uniform practices. Since FOA is at the heart of the DA, an industry-wide agreement offers the potential of lowering the cost of GBVH programming for all participating brands while at the same time taking wages out of competition for the suppliers. But there are several factors that militate against such scaling. First, doing so would require organized employers and a strong labor movement. While employers are organized in different forums, such as the Tirupur Exporters Association, they are not organized for the purpose of labor relations since there is no labor movement on the other side and no bargaining relationship. Although there are many unions active in the area, they don't have the penetration and few, if any, factories are unionized.

Second, as the vast majority of my interviewees suggested, there is strong reluctance in the Tirupur cluster, which is composed mainly of family-owned enterprises, to recognize and bargain with labor unions.

Third, at least one brand representative argued that it would not be possible to organize workers into unions in Tirupur, in part because workers are generally paid by the piece-rate and because many migrant workers want to maximize earnings and see unions as hurting their “freedom of movement.” Hence, these workers find it easier to use “exit” from particular workplaces, especially given the general shortage of labor in the cluster, rather than exercise “voice” in factories.³⁴

Fourth, as an Eastman representative argued, convincing other suppliers to accept the agreement is a hard sell because they will ask whether the DA has brought about increased business for Eastman—and the answer to that question is still negative. He suggested that other suppliers need a persuasive business case for adoption of innovative agreements like the DA, especially to overcome their reluctance to deal with unions. While Natchi is experiencing positive effects from the DA in terms of addressing GBVH, as well as some increases in productivity and reduced absenteeism, it is not at present turning a profit.

Finally, an AFWA representative who works in the area suggested that many suppliers view having an agreement as an indicator of problems—it is seen as a business risk, and global brands may stop sourcing from factories because of such agreements.

Scaling may be possible, particularly if Tirupur suppliers can be convinced that prevention, remediation, and elimination of GBVH can be an opportunity for growth. One approach might be to introduce a single GBVH program in the entire cluster. Consider that about 100 global brands source from Tirupur at present. Of these, 20–25 brands account for 60% of the sourcing,³⁵ which gives them some leverage.

Voluntary Approaches in Tirupur

The DA has inspired a nascent voluntary approach to scaling in Tirupur, as exemplified by the Textile Industry Coalition (TIC). Best described as a multi-stakeholder initiative, it includes one global brand (H&M), 13 of its suppliers, three different industry associations, 10 civil society organizations, 8 unions active in the area, and several multi-stakeholder organizations (including ETI, Fairwear, RISE, and the ILO).

The TIC's focus is the creation of an enabling ecosystem for the prevention, remediation and ultimate elimination of GBVH in participating factories. The ecosystem includes a factory and workplace approach, a community-level approach, and integration with the policy level (the POSH Act). At the factory level, the focus is on improving factory policies, training staff and workers to become change agents, and the creation of a first information person that is loosely analogous to the DA's shop-floor monitors³⁶. At the community level, the focus is on behavioral change, helped by the creation of women empowerment groups and change agents, while at the policy level, the focus is to strengthen the implementation of the POSH Act, including training government officers, among other things.

This is not a comprehensive description of the TIC's work (details can be seen at its [website](#)), but its various

³⁴ A recent report (The PRINT 2025) suggests that there are 2,500 export garment units in Tirupur employing 200,000 migrant workers from other Indian states such as Bihar, Jharkand, Uttar Pradesh, and Odisha.

³⁵ These estimates were pieced together from interviews with brand representatives located in India and some local journalists.

³⁶ DA stakeholders disagreed sharply on this point. The labor stakeholders believe that these First Information Persons (FIPs) are in no way analogous to SFM's because they do not operate with a union and unfettered FOA. H&M believes that FIPs can serve a useful function without FOA.

KPI's and targets are ambitious. Absent from the TIC approach, however, are the key elements of the DA's success—a program to address GBVH through a multi-channel grievance procedure “backstopped” by a women-led representative union and collaborative labor-management relations.

Scaling Nationally

FOA is a key ingredient in the DA's success, and scaling to other levels would also require FOA and collective bargaining. The arguments mentioned above also apply to scaling beyond Tirupur. One potential for scaling in the entire industry is the approach taken by ACT (Action, Collaboration, Transformation) in Cambodia. As described on the ACT website here, it is an agreement between global apparel brands and IndustriALL (a global union Federation) to support collectively bargained wages for Cambodian garment workers. ACT does not currently focus on GBVH. An ACT-like approach across all of India that focuses on GBVH may be difficult given the country's size, but may be more feasible at a cluster level if there are institutions of employers and unions.

An ACT-like structure, however, requires agreement from global brands sourcing from India, and a global union on the other side. IndustriALL has about 16 affiliates in India, covering a relatively small percentage of Indian workers in the formal sector.³⁷ It also has only one affiliate in the textile industry that does not cover most garment workers. Hence the comment by a labor stakeholder that ACT's activities in the Tamilnadu garment sector are “underwhelming—they do not have a strong reputation amongst local unions.” Besides, an ACT-like structure would also need cohesive industry-level unions, so even outside ACT/IndustriALL there are structural constraints to scaling. A labor activist indicated that most Indian unions lack a strong gender lens or experience in addressing GBVH, and IndustriALL's India staff were no exception. For an ACT-like structure to provide DA-type results, there would need to be more union representation at the individual factory level,

which is rare in the Indian garment sectors in South (and North) India.

A second option for industry-level agreements can be found through AFWA-India, which has an organization of garment unions called Asia Brand Bargaining Body-India (ABBG-India). AFWA-India also has a Women's Leadership Committee-India (WLC-India) composed of women trade union leaders in the garment sector. Both ABBG and WLC in AFWA are possibilities for industry-level agreements in India, as long as brands sourcing from India and local employers are ready to bargain with these bodies, which has not yet occurred. These organizations could be strengthened if the major national unions such as INTUC, CITU, AITUC and others could be induced to be supportive partners.

A third scaling option is to think of an International ACCORD-like structure. The International ACCORD covers a majority of export factories in the garment industry in Bangladesh and Pakistan, with 272 brands as part of the agreement. While the International ACCORD focuses mostly on fire and building safety, it may be possible to fashion an Accord *focused solely on GBVH*.³⁸ But India is big country with highly fragmented supply chains geographically and with different labor market dynamics, unlike in Bangladesh where the Accord covered the whole export industry. In addition, an Accord-like structure needs international unions, and IndustriALL's footprint is very small in the Indian garment industry. Therefore, it may make sense to think of an Accord at the level of the cluster noted above. However, the problem noted above with regard to scaling to Tiruppur—that is, the absence of plant-level unions—will hold true here too. At present, there is no urgency or “trigger” for brands or suppliers to think about Accord-like structures.

Conversely, a brand representative expressed skepticism of ACCORD-like structures in Tirupur, noting that it would be difficult to get global brands together with

³⁷ It is notoriously difficult to obtain accurate union density figures for India, in part due to the unreliability of counts of union members (the numerator in union density calculations) from the annual returns submitted to the government. Unions tend to inflate these numbers (Kuruville et al 2002). Calculating union density nationally is also difficult because some researchers use the Indian civilian workforce as the denominator (resulting in very small union density percentage of 5% or less). Others use the formal sector industrial workforce as the denominator, which resulted in union density of 12.8% in 2011 according to the OECD. Note further that many formal sector union members work in the service sector and in government. And roughly 85% of Indians work in the informal sector. With respect to IndustriALL affiliates in India, although the affiliates list the number of members on their website, the percentage of the workforce in that industry covered (the denominator) is unclear. Hence my claim that the IndustriALL footprint in India is small.

³⁸ The Pakistan Accord includes GBVH.

unions for a binding collective agreement given the lack of experience of US brands in dealing with unions and labor relations compared to European brands. Another obstacle could be multi-unionism in India that prevents union cooperation and single bargaining agent status at the industry level. An alternative argument is that an ACCORD-like industry agreement to end GBVH could be a source of competitive advantage. It is also possible that such an agreement could be tied to a free trade agreement with labor clauses, modeled after the FTAs that the United States has signed with various countries.

Thus, the challenges for scaling the DA nationally in ways that would provide DA-like results seem difficult to overcome. And in more abstract terms, a brand representative appreciative of the role of trust between labor and management in the DA, posed a general question: “How do you scale the level of trust between workers and union and between labor and management that provides the Dindigul results to industry/cluster levels?”

Scaling Internationally

There are two possible pathways to scale a labor-management agreement across countries. One option is the framework agreement, such as the bilateral agreements between IndustriALL and global brands such as H&M, Zara, and others, which in theory could cascade down into all factories in the supply chains of individual brands. The large literature on framework agreements in different industries is generally pessimistic about their effectiveness, and one key conclusion is

that for a framework agreement to trickle down there must be local unions to implement it at the factory level (McCallum, 2013; Sarkar and Kuruvilla 2020; Fichter and McCallum, 2015). Established local representative unions that share a collaborative relationship with management as in the DA case, are not “thick on the ground” in most apparel exporting factories and countries. Given AFWA’s structure as a labor-led alliance with garment union partners across Asia, local unions in AFWA’s structure could be identified and supported to play this role.

There are other approaches in the global apparel industry that seek to address GBVH issues, such as RISE. One brand representative suggested that RISE offered the potential of a “scalable” model to address GBVH. RISE is a multistakeholder initiative that supports collaborative industry action to build greater gender equality and resilient futures at scale in global garment, footwear, and home textiles supply chains. In its capacity-building role, RISE offers several programs focused on worker life-skills development and health and financial literacy and resilience, and supports workers and factories to address and prevent gender-based violence and harassment (for more explicit detail on RISE strategies, its four main programs, and its impact, see its website [here](#)).

I do not see RISE as an effective alternative here because the lessons on why the DA works well to address GBVH—FOA, grievance systems, and labor-management collaboration, among others—is not in RISE’s *modus operandi*.



CONCLUSION

The DA is a rare and remarkable example of a successful program to combat GBVH in a single factory that is part of the global apparel supply chain. It is an important “proof of concept” that points us to institutions that play an important role in the prevention, remediation and elimination of GBVH. First, it underscores the importance of women-led union active in GBVH issues in both the community and the factory. Second, it demonstrates the *core value* of FOA in the prevention, remediation and elimination of GBVH. Third, it shows that workers themselves can play important roles in addressing GBVH—exemplified by the worker shop-floor monitors at the Natchi factory. Fourth it shows that union management collaboration can enhance a grievance mechanism in terms of multi-channel accessibility and speed of resolution of GBVH and other issues, contributing to both worker welfare as well as the mitigation of business risk for brands. Finally, it highlights the value of ICCs in creating a discourse around GBVH that is both educational and catalytic for women workers. These are the elements of the DA that are the *most salient* to its success.

A biological analogy may be useful in thinking about the DA. The DA is a unique example of a self-sustaining *ecosystem* to address GBVH.³⁹ As Finegold (1999) suggests, self-sustaining ecosystems are typically characterized by a *catalyst*, that is, an event or external trigger that initiates its establishment; *sources of nourishment* that enable growth; a *supportive host environments* that enables its sustainability, and a *high degree of interdependence*, which is what differentiates an ecosystem from a group of separate institutions.

Clearly, the Justice for Jeyasre campaign led by AFWA, GLJ, and the TTCU following Jeyasre’s death was the external catalyst that initiated the establishment of the DA. The investments in training, establishment of the multi-level grievance mechanism, creation of shop-floor monitors and implementation committees, and the guidance provided by the labor stakeholders through the early stages can all be seen as important sources

of nourishment responsible for the growth of the ecosystem. The high degree of legitimacy of the TTCU in both the community and as the workers’ representative, the high levels of union-management collaboration, and the legal requirement of ICCs constitute the supportive environment that enables the sustainability of the ecosystem. Obviously missing from the supportive environment is more business for Eastman, an important element in nourishment, but Eastman’s continuing support for this loss-making factory has thus far compensated.

In terms of interdependence, many elements of the ecosystem are mutually reinforcing. For example, training and counseling educates workers about GBVH, workers do not fear retaliation when raising GBVH and other grievances given the presence of the union, and labor-management collaboration is key to quick resolution of those grievances, which reinforces worker trust in the grievance mechanism. The legally required ICCs, with worker representatives and reputable independent assessors, create an overall educational discourse about GBVH and is, for some workers, catalytic for action at home and work, while also ensuring that management takes its recommendations seriously.

The DA works because it is a *self-sustaining hyper-local ecosystem* with interdependent parts. It may not be replicable *exactly*, but its underlying principles can be used to create functionally equivalent institutions tailored to other specific contexts. These principles include training, counseling, and building awareness among labor and management; using workers to educate and assist other workers to combat GBVH; safeguards such as FOA that catalyze women workers to voice grievances without fear of retaliation; an effective grievance resolution system that includes worker voice; and a genuine commitment from management and workers to work together to end GBVH.

Stakeholders have varying views regarding the future of the DA. One view is that the DA should continue in

³⁹ The Accord in Bangladesh can be seen as creating an ecosystem to improve fire and building safety, with its own catalyst (Rana Plaza) and nourishment (agreements between the unions and brands, and financial contributions), supporting environment (sourcing commitments of brands and the expertise to remediate factory conditions), and interdependence (that all of the institutions created worked together).

its current form, since it is still an “unfinished” project –a very successful program for women workers that has not yet delivered for business. Others expressed the idea that it is unfinished because three years is not enough time to educate workers about the nuances of GBVH and generate sustainable change in the culture of the workplace, particularly in terms of “moral policing.” Others feel that the agreement has been successful and has yielded many lessons for other factories in industries dominated by women workers, but that the formal interlocking agreements should not be renewed. Both management and union indicate that they will continue to work together collaboratively after the agreement and into the future, and most stakeholders agree that labor-management partnership is the key to long-run sustainability. The agreement formally concluded on October 31 and the stakeholders have chosen not to renew it.

Whether more needs to be done by all stakeholders to publicize the lessons of the DA remains an open question. In my opinion, that would be helpful. Both brands and labor stakeholders have indicated that they have consistently activated their professional networks and used social media to publicize the work. But earlier published results did not provide a comprehensive independent assessment of the DA that could be used for publicity. There remains, in my view, a need for new narratives in important outlets and policy forums about the DA’s success, which could ultimately lead to more sourcing. Consistent with the predictions of institutional theory (DiMaggio and Powell 1983), best practices will diffuse if enough actors know about it, creating pressures for brands and suppliers to “imitate.”

For activist organizations around the world trying to address GBVH in the supply chain context, the multi-level model (factory, organization and global) developed by and enacted here by AFWA, GLJ and TTCU serves as a useful lesson. Activist organizations may also consider lobbying in their own countries for legal institutions like ICC’s that strengthen women workers voices to end GBVH. For all stakeholders, the central roles of FOA and labor management collaboration in “backstopping” the GBVH grievance process is a key lesson. For factories as

well, the DA has shown the positive effects of having a union and a collaborative labor-management relationship. The positive role of worker SFMs should be celebrated and proselytized, since they resolve issues before they escalate.⁴⁰

The problem of GBVH is a global issue and one that needs to be addressed urgently. The DA has shown the value of creating an eco-system to combat and prevent GBVH. Again, while it may not be easy to replicate the exact same ecosystem in every factory, labor stakeholders should seek to create functionally equivalent ecosystems using the principles that underlie the DA model—such as in the CJA case. More functionally equivalent replications are highly necessary to show that the DA is not an isolated case. The more replications that can be achieved, the better for the women who form the majority workforce in the global apparel industry. Rigorous studies of existing replications are also necessary.

However, given the scale of the problem, it is necessary to go beyond factory-by-factory approaches to scale at the cluster level or nationally. In an era of an increasing number of free trade agreements with labor clauses, like those entered into between the US and EU with many countries, incorporating GBVH more forcefully into these agreements maybe a worthwhile challenge for stakeholders to achieve scale.

Global brands everywhere could do more to address GBVH in the supply chain. A key implication of the DA for global brands is that they must also better connect their commitment to end GBVH with their sourcing practices. Emerging Human Rights due diligence legislation in Europe provides a legislative incentive for global brands to source from factories that have a successful GBVH program with a grievance procedure that meets OECD guidelines and FOA that delivers mutual gains, thus eliminating some sources of supply chain human rights risk. It is possible that the legislative incentive may trump the economic incentive of intense price competition.

⁴⁰ More could be said about worker SFMs than I have done in this report. Additional research on worker SFMs will be helpful: although worker SFM’s reported to us that they deal with several GBVH issues before they escalate and become a grievance, there is no systematic count. Studying the role of SFM’s is important because that is a key takeover voiced by several observers. However, it is useful to remember that they work well in part because they are embedded in the DA eco-system.

Without clear brand alignment and support through sourcing, the burden of advancing such programs falls on worker organizations (where they exist) and most acutely on the women who speak out about GBVH. Thus, when global brands choose not to source from factories with Enforceable Brand Agreements like the DA, it sends a mixed signal, often reinforcing anti-union attitudes among suppliers, which in turn increases the reputational risk for brands. It is necessary to demonstrate that best practices in addressing GBVH in global supply chains will attract more business.



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APPENDIX: LIST OF INTERVIEWEES

Krishanti Dharmaraj, Chair of the Oversight Committee, Dindigul Agreement

Asia Floor Wage Representatives: Anannya Bhattacharjee, Ashim Roy, Aparna Roy and S. Sinduri

Global Labor Justice: Jennifer J. Rosenbaum

Tamil Nadu Textile and Common Labor Union: Thivya Rakini, Navamani and 9 other union organizers

Gap Inc.: Komala Ramachandra and Sharmila Nityanand

PVH Corp: Michael Bride, Meghna Sarma and Tejus Sampat

H&M: Julia Bakutis, Anastacia Howe and Hari Kumar

Eastman Management: Cibi Karthic, Alagesan Senniappan, Sakthi Saravanan and G. Manimegalai

DA Program Staff: Sumathi Mani

Vaanam Group Trainers and Counselors: Sivasakthi Abinaya and Geetha Charusivam

Independent Assessors: Kalyani Menon-Sen and Geetha Charusivam

ICC Spinning Chair: Iccha Hegde and Eastman

Independent Consultant: Nandita Shivakumar (former employee of AFWA when the DA commenced)

In addition, I interviewed several 'non-stakeholders' i.e. not directly related to the DA. These included representatives of the Textile Industry Coalition, Representatives of UN Women, RISE, and several others knowledgeable about labor and industrial relations in India generally, such as professors, journalists, observers. Conversations with these people, while not directly related to the DA, have also informed my perspective.



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