

# INITIAL FIRE SAFETY INSPECTION REPORT

**Indochine Apparel (Bangladesh) Limited, Plot 54-56 (Previously Baxter  
Brenton (BD) Clothing Manufacturing Co. Ltd (Extension)**

**RSC ID: 25854**

**Geographical Coordinates: 23.9496652222, 90.2680986943**

**Address: Plot-54-56, DEPZ (Old Zone), Ganakbari, Ashulia, Savar, Dhaka**

**Other Factories: None**



**Inspected By: Md. Anisuzzaman & Md Kawsar Rubaiat**

**Date: 09-September-2025**

## Fire Safety Inspection Report

### Indochine Apparel (Bangladesh) Limited, Plot 54-56 (Previously Baxter Brenton (BD) Clothing Manufacturing Co. Ltd (Extension)

#### Introduction:

**Indochine Apparel (Bangladesh) Limited, Plot 54-56 (Previously Baxter Brenton (BD) Clothing Manufacturing Co. Ltd (Extension)**, complex was surveyed for fire safety on **09-Sept-2025** by The RSC Inspection Team. The purpose of the survey was to identify significant fire safety issues and to provide recommendations for remediation based on applicable standards specified by the RSC. The scope of this initial fire safety inspection was limited to the review and identification of major fire safety issues. The inspection did not include identification of minor deficiencies, which will be further addressed as part of follow-up inspections.

#### Limitations

The information in this fire safety inspection report was obtained during a visit to the facility and during interviews with local factory management. It has not been possible to provide independent verification for all the information and data collected, and, therefore, The RSC cannot accept general responsibility for omissions or errors arising from inaccuracies in this report from the information obtained.

The findings and recommendations in this report are not intended to imply, guarantee, ensure or warrant compliance with any government regulations. Additionally, the results do not imply in any way that compliance with the findings or recommendations as stated in this report will eliminate all hazards, risks or exposures or that hazards, risks or exposures not referred to in this report do not exist. Compliance with the findings and recommendations stated in this report does not relieve the factory owner from obligation to comply with specific project requirements, industry standards, or the provisions of any local government regulations.

### General Factory Information

There are total 7 structures covered under this RSC ID-25854. Among these one structure is for production and other six structures are ancillary. The buildings are as below:

| SL No | Building Name                                                                                                                         | Building Construction Period | Approval Date & Authority                                                                                                                                                        | Occupied                                                                                                                                                                                                                                                                                                                               | Structure type | Construction Category |
|-------|---------------------------------------------------------------------------------------------------------------------------------------|------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|-----------------------|
| 1     | Buliding-1 (Production):<br>G+3 Storied RCC building<br>with Steel Shed Dining<br>on the Roof<br>Total Floor Area:<br>1,53,320 Sq. ft | Jun-2008 to Nov-2010         | Design submission date after<br>structure modification DEPZ<br>on 11-Jun-2019 (for re-<br>approval), BEPZA (DEPZ). No<br>approval date was found on<br>the approved signed copy. | The building was<br>previously named<br>Baxter Brenton (BD)<br>Clothing<br>Manufacturing Co.<br>Ltd. (Extension). Later<br>renamed under the<br>name of Indochine<br>Apparel (Bangladesh)<br>Limited since<br>September 2024, as<br>indicated in the Fire<br>License.<br>(Previously occupied<br>by Lenny Apparels<br>Ltd. since 2009) | RCC & Steel    | Interim Building      |
| 2     | Building-2 (Utility): Single<br>Storied<br>Total Floor Area: 2,200<br>Sq. ft                                                          | Jun-2008 to Nov-2010         |                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                        | RCC            | Interim Building      |
| 3     | Building-3 (Boiler): Single<br>Storied<br>Total Floor Area: 435 Sq.<br>ft                                                             | Jun-2008 to Nov-2010         |                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                        | RCC            | Interim Building      |
| 4     | Building-4 (Childcare,<br>Medical & Security):<br>Single Storied<br>Total Floor Area: 2, 130<br>Sq. ft                                | Jun-2008 to Nov-2010         |                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                        | RCC            | Interim Building      |

|   |                                                                                                 |                       |  |  |     |                   |
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| 5 | Building-5 (Fire Pump Room & UGWR): Single Storied<br>Total Floor Area: 820 Sq. ft              | Jan-2019 to Jul-2019  |  |  | RCC | Interim Building. |
| 6 | Building-6 (Instrument Room with Domestic UGWR): Single-storied<br>Total Floor Area: 203 Sq. ft | Feb-2012- May-2012    |  |  | RCC | Interim Building  |
| 7 | Building-7 (RMS Room): Single Storied<br>Total Floor Area: 100 Sq. ft                           | Sept-2010 to Oct-2010 |  |  | RCC | Interim Building  |

**Factory Address: Plot-54-56, DEPZ (Old Zone), Ganakbari, Ashulia, Savar, Dhaka**

## Findings & Recommendations :

Table-1 summarizes the major fire safety issues identified during the inspection. Recommendations have been provided to address each issue. An implementation schedule shall be developed by the factory to remediate each of the findings. The specific timing of improvements, including any requested extensions due to design / installation constraints, shall be submitted to the RSC for review.

**Table-1: All structures under this ID**

| SI No.                                                                                                                                                                             | Category        | Findings                                                                                                                                                                                   | Required Action                                                                                         | Remediation Time Frame |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|------------------------|
| F-01                                                                                                                                                                               | Means of Egress | Proper certification was not available for fire-rated doors and door accessories installed in the factory.<br><br><b>Location(s): Store room, Exit stairs of all floors (Building-01).</b> | Keep proper datasheet & certifications for installed fire doors & accessories on-site for verification. | Within 3 months        |
| F-02                                                                                                                                                                               | Means of Egress | The clearance under the bottom of the door was more than 19 mm.<br><br><b>Location: Stair-3 (Dining).</b>                                                                                  | The clearance under the bottom of a door shall be a maximum of 3/4 in. (19 mm).                         | Within 3 months        |
| <div>   </div> |                 |                                                                                                                                                                                            |                                                                                                         |                        |

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| F-03                                                                               | Means of Egress | <p>During the inspection, it was noted that the fire doors were not effectively latching and door coordinators were not properly functional.</p> <p><b>Location(s): All floors (Building-01).</b></p> | <p>Ensure that the fire doors are self-closing and positive latching. If fire doors are required to be held open for operational purposes, provide automatic closing devices tied to the fire alarm system.</p> | Within 3 months |
|  |                 |                                                                                                                                                                                                       |                                                                                                                                                                                                                 |                 |

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| F-4                                                                                                                                                                                                                                                           | Means of Egress | <p>The fire doors at the exit stair enclosures are not properly interfaced with the fire alarm &amp; detection system on all floors.</p> <p><b>Location(s): All floors, Building-1.</b></p> | <p>Ensure that upon fire alarm activation, any door holder automatically release the fire rated doors. In addition, wiring of any power supply interfaced with the fire alarm module(s) for controlling the shut-down of door holder in a fail-safe manner (i.e., door holder automatically release upon loss of power to the power supply) and ensure that the door holder do not re-energize upon silencing of the fire alarm system.</p> | Within 3 months |
| <div style="display: flex; justify-content: space-around; align-items: center;">   </div> |                 |                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                             |                 |

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| F-5                                                                                | Means of Egress | <p>Exit access corridor(s) serving more than 30 occupants is not separated by fire rated construction due to non-listed fire doors or protected by sprinkler system in accordance with NFPA 13 and section 6.3.1.1 of RSC Technical Guidelines (Standard)<sup>1</sup> V1.0.</p> <p><b>Location: 3rd floor of the building-1(production)</b></p> <p><b>Non-compliance: Listing label was not found installed fire door.</b></p> | <p>1. Separate the exit access corridor by a minimum 1-hr fire rated construction .</p> <p>Or</p> <p>2. Provide automatic sprinkler system throughout the storey as per NFPA 13.</p> | Within 3 Months |
|  |                 |                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                      |                 |

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| F-6                                                                                | Means of Egress | <p>Fire evacuation maps are not updated/not provided at all required locations.</p> <p><b>Location(s): All Buildings.</b></p>                                       | <p>Update the fire evacuation map and shall be posted at the entrance to each exit stair in accordance with RSC Technical Guidelines (Standard)<sup>1</sup> V1.0 Section 13.3.</p> | <p>Within 1 Month</p> |
| F-7                                                                                | Means of Egress | <p>Some lighted exit signs were two-sided, so that they indicated an exit where there were none.</p> <p><b>Location: 3rd floor, office area. (Building-01).</b></p> | <p>Ensure that lighted exit signs are only visible from the side that directs people toward an exit path.</p>                                                                      | <p>Within 1 Month</p> |
|  |                 |                                                                                                                                                                     |                                                                                                                                                                                    |                       |

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| F-8                                                                                                                                                                                                                                                           | Means of Egress | <p>Directional signs are not provided where direction of the path of travel to an exit has changed.</p> <p><b>Location(s): All floors (Building-01).</b></p> | <p>Illuminated directional signs shall be provided where there is a change in the direction for the path of travel and the direction to an exit is not obvious in accordance with RSC Technical Guidelines (Standard)<sup>1</sup> V1.0 Section 6.11.3.</p> | Within 1 Month |
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| F-9                                                                                                                                                                                                                                      | Means of Egress | <p>Based on the number and location of emergency lights observed, adequate illumination levels are not anticipated along egress routes.</p> <p><b>Location(s): All floors (Building-01).</b></p> | <p>Test the emergency lighting system on each floor and provide additional emergency fixtures to provide adequate illumination along the means of egress. Provide a minimum illumination of 10 lux at the floor level within exit stairs and exit discharge paths and minimum 2.5 lux along exit access aisles. Illumination on means of egress shall meet in accordance with RSC Technical Guidelines (Standard)<sup>1</sup> V1.0 Section 10.12.2.</p> | Within 3 Months |
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| F-10                                                                               | Means of Egress | <p>Stair width is more than 87 inches (one flight- 91 inches), but no intermediate handrails have been provided.</p> <p><b>Location(s): Stair-2 (Building-01).</b></p> | <p>Intermediate handrails shall be provided when the stair width exceeds 2.2 m (87 in.).</p> <p>Open guards shall have intermediate rails or pattern such that a sphere 200 mm (8 in.) in diameter cannot pass through any opening up to a height of 865 mm (34 in.). Handrail shall construct in accordance with RSC Technical Guidelines (Standard)<sup>1</sup> V1.0 Section 6.12.</p> | Within 3 Months |
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| F-11                                                                               | Means of Egress | <p>Changes in level was found 24 in. where RSC Technical Guidelines (Standard)<sup>1</sup> V1.0 Section 6.9 or 6.10 doesn't meet.</p> <p><b>Location: Exit stair-1, 2 &amp; 3 at the ground floor of Building 1.</b></p> <p>Non-Compliance Reason: Handrails not provided.</p> | <p>Changes in level exceeding 535 mm (21 in.) in elevation shall meet the requirements for stairs in 6.9 or ramps in 6.10. The change in level shall be readily apparent and if not, marked with additional signage or floor markings.</p> | Within 3 Months |
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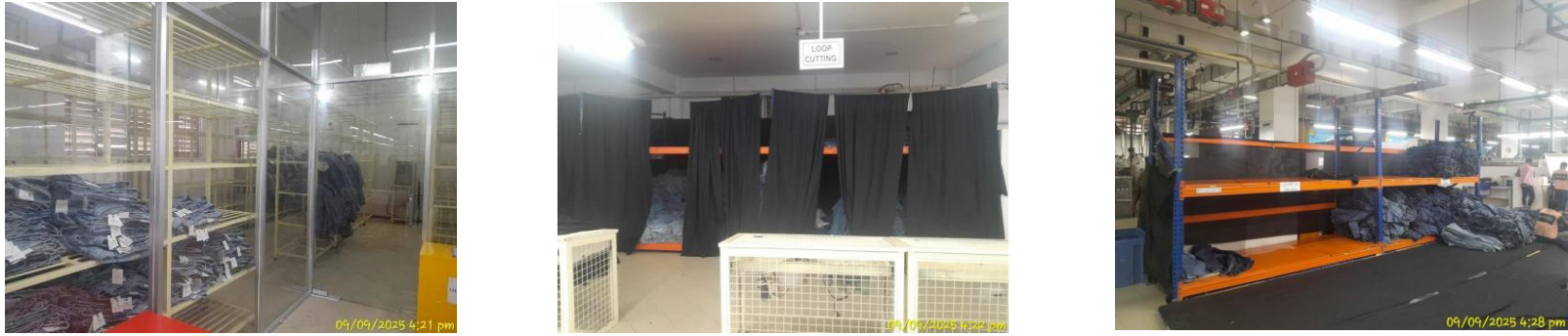
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| F-12                                                                                                                                                                                                                                                          | Means of Egress | <p>The guards have gaps that are too large, allowing a sphere 200 mm (8 in.) in diameter to pass through.</p> <p><b>Location: Roof top. (Building-01).</b></p> | <p>Open guards shall have intermediate rails or pattern such that a sphere 200 mm (8 in.) in diameter cannot pass through any opening up to a height of 865 mm (34 in.).</p> | Within 3 Months |
| <div style="display: flex; justify-content: space-around; align-items: center;">   </div> |                 |                                                                                                                                                                |                                                                                                                                                                              |                 |

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| <b>F-13</b>                                                                                                                                                                                                                                                   | Means of Egress | <p>Parapets or guards are provide which less than 42 inch in occupiable roof.</p> <p><b>Location: Lift machine room on the roof top.</b><br/>(Building-01).</p> | <p>Provide parapets or guards with a minimum height of 1067mm (42 inch.) in accordance with RSC Technical Guidelines (Standard)<sup>1</sup> V1.0 Section 6.12.</p> | Within 3 Months |
| <div style="display: flex; justify-content: space-around; align-items: center;">   </div> |                 |                                                                                                                                                                 |                                                                                                                                                                    |                 |

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| F-14                                                                               | Means of Egress | <p>Uneven walking surface were found and exceed a slope of 1 in 20 in the direction of travel.</p> <p>Location: West side of the building -01</p> | <p>Walking surfaces shall be mostly level; however, shall not exceed a slope of 1 in 20 in the direction of travel unless meeting the requirements for ramps in 6.10 shall meet the requirements for RSC Technical Guidelines (Standard)<sup>1</sup> V1.0 Section 6.3.4.2</p> | Within 3 Months |
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| F-15                                                                                                                                                                                                                                                            | Fire Rated Construction | <p>Penetrations through floor/ceiling assemblies are found unsealed due to non-functional fire doors. Factory has reportedly used fire-rated collars in the accessories store, but documents are required to be verified.</p> <p><b>Location: All floor toilet areas, Accessories Store (GF).</b></p> <p><b>Non-compliance reason: Plastic Plumbing Pipe Penetrations.</b></p> | <p>Seal all penetrations and openings in floor/ceiling assemblies by a listed through-penetration fire stop system tested in accordance with ASTM E814 or approved alternative standard to maintain minimum 3-hr. fire resistance rating. Installation shall be as per the manufacturer's published installation guidelines and the certification authority guideline to ensure the fire-rating in accordance with section 4.7 of RSC Technical Guideline (Standard)</p> <p>Or,</p> <p>Provide a minimum 2-hr fire-rated shaft to separate the penetration from each floor if required.</p> <p>Factory shall ensure that all the design, datasheet, certificate, and proposed drawings of installation have been reviewed by the RSC (If required).</p> | Within 3 Months |
| <div style="display: flex; justify-content: space-around; align-items: center;">   </div> |                         |                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                 |

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| F-16                                                                                                                                                                                                                                                            | Fire Rated Construction | <p>Penetrations through floor/ceiling assemblies are found unsealed due to non-functional fire doors and penetrations.</p> <p><b>Location: All floors.</b><br/> <b>Non-compliance reason: BBT Penetrations.</b></p> | <p>Seal all penetrations and openings in floor/ceiling assemblies by a listed through-penetration fire stop system tested in accordance with ASTM E814 or approved alternative standard to maintain minimum 3-hr. fire resistance rating. Installation shall be as per the manufacturer's published installation guidelines and the certification authority guideline to ensure the fire-rating in accordance with section 4.7 of RSC Technical Guideline (Standard)</p> <p>Or,</p> <p>Provide a minimum 2-hr fire-rated shaft to separate the penetration from each floor if required.</p> | Within 3 Months |
| <div style="display: flex; justify-content: space-around; align-items: center;">   </div> |                         |                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                 |

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| F-17                                                                                | Fire Rated Construction | <p>Areas used for in-process storage of combustible materials are open to the surrounding occupancy.</p> <p><b>Location: Ground , 2nd &amp; 3rd floors of the building-1</b></p> <p><b>Non-compliance reason: Improper storage area.</b></p> | <p>Provide defined storage areas and limit the storage arrangement as follows:</p> <p>Maximum height of 2.45 m and maximum area of 23 m<sup>2</sup> and is separated by a minimum 3.0 m (10ft) from other storage areas and they do not exceed 10 percent of the building area of the story in which they occur.</p> <p>or,</p> <p>If sprinkler protected, Maximum height 12 ft (3.66 m) and maximum area of 1000 ft<sup>2</sup> (93 m<sup>2</sup>) and separated by a at least 25 ft (7.62 m) and does not constitute more than 10 percent of the building area or 4000 ft<sup>2</sup> (372 m<sup>2</sup>) of the sprinklered area, whichever is greater.</p> <p>or,</p> <p>Enclose the storage area from the surrounding occupancy with a minimum 1 hour construction.</p> | Within 3 months |
|  |                         |                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                 |

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| F-18 | Fire Rated Construction | <p>Main structural elements of the interim Steel Dining Shed located on the Roof level/4th floor are non-rated steel members, which are non-rated and were found in exposed condition without any fire protection.</p> <p><b>Location: Dining Shed (roof).</b></p> | <p>The construction type is unprotected steel construction. As per RSC Technical Guideline and BNBC 2006, The Fire rating of the structure requires to be confirmed as per BNBC 2006. The "Ministry of Housing and Public Works" has issued a resolution based on the recommendations from the House Building Research Institute (HBRI) and the Public Works Department (PWD) to assess structural fire protection requirements of steel buildings (unprotected non-combustible construction type) according to BNBC 2020. The construction type shall confirm to be in accordance with BNBC 2020 Part-3, Table 3.1.7. Ensure fire resistive rated construction following Table 3.3.1 (a) Part 3 Section-3, Table 3.2.2 and Table 3.2.3 Part 3 Section 2 and Table 4.1.1 from BNBC 2020 Part 4 Section 1. Provide design philosophy to determine the construction type as per BNBC 2020. If any construction rating requires, Consult a qualified fire protection engineer to achieve the required fire rating.</p> <p>Submit the design philosophy along with the required documents to RSC for review the required construction type. Once the design philosophy is reviewed, provide fire ratings of structural members.</p> | Within 6 Months |
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| F-19                                                                               | Fire Alarm & Detection System (FADS)     | <p>The factory has installed a fire alarm and detection system that requires a detailed review to confirm compliance with NFPA 72 and RSC Technical Guidelines (Standard).</p> <p><b>Location(s): All Buildings.</b></p> | <p>Submit the fire alarm and detection system design to RSC for review.</p> <p>Once the design is reviewed, install and modify the fire detection and alarm system throughout the building in accordance with review comment, RSC Technical Guidelines (Standard) and NFPA 72.</p> <p>After installation the owner shall conduct internal testing and commissioning and then contact the RSC for witness of final acceptance testing.</p> | Design within 2 month and modification/ installation with 4 months |
|  |                                          |                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                    |
| F-20                                                                               | Inspection, Testing & Maintenance (Fire) | <p>Inspection, testing and maintenance for the fire alarm system is not in accordance with NFPA 72.</p>                                                                                                                  | <p>Inspect, test and maintain the fire alarm system and keep written records on-site, in accordance with NFPA 72 and RSC Technical Guidelines (Standard)<sup>1</sup> V1.0.s.</p>                                                                                                                                                                                                                                                          | Within 1 Month after installation.                                 |

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| F-21 | Fire Suppression System (SUPS) | <p>The factory has installed a standpipe &amp; Hose system that requires a detailed review to confirm compliance with NFPA 14,20, 24 and RSC Technical Guidelines (Standard).</p> <p><b>Location: Building-1.</b></p> | <p>Submit the standpipe system drawing to RSC for review.</p> <p>Once reviewed, install or modify the standpipe system throughout the building in accordance with RSC Technical Guidelines (Standard)<sup>1</sup> V1.0. and NFPA 14, 20,22 and 24.</p> <p>After installation the owner shall contact the RSC for witness of conducting the final acceptance testing of the standpipe system.</p> | <p>Design within 2 month and modification/ installation with 4 months</p> |
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| F-22 | Fire Suppression System (SUPS)           | Fire pump installation requires detailed review to confirm compliance with NFPA 20 and RSC Technical Guidelines (Standard) <sup>1</sup> V1.0. | <p>Submit as-built drawings, testing records, equipment certification and other relevant documentation to the RSC for review and approval.</p> <p>Submit the standpipe system drawing to RSC for review. Once reviewed, install or modify the standpipe system throughout the building in accordance with RSC Technical Guidelines (Standard)<sup>1</sup> V1.0. and NFPA 14 and 20. The factory management shall contact RSC to conduct the final acceptance testing after the installation, testing &amp; commissioning.</p> | Design within 2 month and modification/ installation with 4 months |
| F-23 | Inspection, Testing & Maintenance (Fire) | Inspection, testing and maintenance of the standpipe system, sprinkler system & fire pump are not in accordance with NFPA 25.                 | Inspect, test and maintain the standpipe system, sprinkler system & fire pump and keep written records on-site, in accordance with NFPA 25 and RSC Technical Guidelines (Standard) <sup>1</sup> V1.0.s.                                                                                                                                                                                                                                                                                                                       | Within 1 Month after installation.                                 |

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| F-24 | Inspection, Testing & Maintenance (Fire) | Inspection, testing and maintenance of portable fire extinguishers is not in accordance with NFPA 10.                                                                       | Inspect, test and maintain the portable fire extinguishers and keep written records on- site, in accordance with NFPA 10 and RSC Technical Guidelines (Standard) <sup>1</sup> V1.0.s.                                                                                                                                                                                                                                                                                                                                      | Within 1 Month |
| F-25 | Inspection, Testing & Maintenance (Fire) | Inspection, testing, and maintenance for the exit sign and emergency lighting system was not in accordance with the RSC Technical Guidelines (Standard) <sup>1</sup> V1.0.. | Inspect, test and maintain the exit sign and emergency lighting system in the accordance with the RSC Technical Guidelines (Standard) <sup>1</sup> V1.0.Keep written records on-site.                                                                                                                                                                                                                                                                                                                                      | Within 1 Month |
| F-26 | Inspection, Testing & Maintenance (Fire) | Written housekeeping policy was not found, which is required as per RSC Technical Guideline (Standard) section 13.6.                                                        | Establish written corporate and plant policies on housekeeping to ensure scheduled cleaning for floor, wall, ceiling, supply and return air ventilation systems. Promptly reschedule skipped cleanings. Provide a documented line of authority for authorizing a cleaning delay and rescheduling. As a general rule the maximum tolerable deposit thickness for loose fluffy lint is 13 mm (½ in.) over a maximum of 46.5 m2 (500 ft2). Limit dense deposits to 6 mm (¼ in.) and oil saturated deposits to 3.2 mm (⅛ in.). | Within 1 Month |

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| F-27                                                                               | Fire Rated Construction                  | The required fire separation distance for Building-01(production) does not comply with the requirements of BNBC 2006. | The exterior walls shall have a fire resistance and opening protection as specified in BNBC 2006, Tables 3.2.2 and Part 3 Section 2.4.1.3.                                                                       | Within 6 Months |
|  |                                          |                                                                                                                       |                                                                                                                                                                                                                  |                 |
| F-28                                                                               | Inspection, Testing & Maintenance (Fire) | Fire drills are not conducted according to section 13.2 of RSC Technical Guidelines (Standard) <sup>1</sup> V1.0.     | Fire drills shall be conducted according to section 13.2 of RSC Technical Guidelines (Standard) <sup>1</sup> V1.0. Fire drills shall be conducted on a monthly basis as outlined in BNBC 2020 Part 4 Appendix A. | Within 1 Month  |