FLA Audit Profile	
Country	USA
Factory name	210082321E
IEM	Accordia Global Compliance Group
Date(s) in facility	September 14-15, 2006
PC(s)	Commemorative Brands, Inc. (CBI)
Number of workers	142
Product(s)	Graduation Announcements, Graduation Accessories, Diplomas, Diploma Covers
Production processes	Printing

FLA IEV
USA
210082321EV
Accordia Compliance Group
December 22, 2010

			IEM Findings							Remediation					[Status]	Updates (Cite Date of Follow up)		Third-Party Verification		Company Verification Follow up	
FLA Code/Compliance Issue	**Country Law/Legal Reference**	**FLA Benchmark**	**Noncompliance**	**Risk of Noncompliance**	**Evidence of Noncompliance (Uncorroborated)**	**If Not Corroborated, Explain Why**	**Sources/Documentation Used for Corroborating**	**Notable Features**	**PC Internal Audit Findings (Optional)**	**PC Remediation Plan**	**Target Completion Date**	**Factory Response (Optional)**	**Company Follow Up (Cite Date of Follow Up)**	**Documentation**	**Completed, Pending, Ongoing**	**Company Follow Up**	**Documentation**	**External Verification (December 22, 2010)**	**Documentation**	**Company Follow Up (Cite Date of Planned or Follow-up Visit, if Appropriate)**	**Documentation**
1. Code Awareness																					
2. Forced Labor																					
There will not be any use of forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise.																					
Employment Records	According to the Immigration Reform and Control Act: All U.S. employers are responsible for verifying the employment eligibility and identity of all employees hired to work in the United States after November 6, 1986. To implement the law, employers are required to complete Employment Eligibility Verification forms (Form I-9) for all employees, including U.S. Citizens.	Employers will maintain sufficient hiring and employment records to demonstrate and verify compliance with this Code provision.	Monitors reviewed 20 personnel files. Of those 20, only 11 files held I-9 forms (9 I-9 forms were missing). Out of the 11 I-9s available, 8 were incomplete.				Monitors reviewed 20 personnel files to assess compliance with employment record keeping standards. Monitors noted noncompliance concerning I-9 forms.			Initiated a full review of the employee files and identified employees with missing I-9s and/or information on the I-9. Implemented an automatic employee verification in January 2007.	Completed June 11, 2007		June 12, 2007		Ongoing	Review completed and update is ongoing.		COMPLETED - Sample of 10 I-9 forms was reviewed and all I-9 forms were found to be completed.	I-9 Forms. Memo dated June 5, 2007 from [Employee name] to workers missing information on their I9 forms, requesting that they provide the missing information by June 11, 2007.		
3. Child Labor																					
No person will be employed at an age younger than 15 (or 14 where the law of the country of manufacture allows) or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15.																					
4. Harassment or Abuse																					
Every employee will be treated with respect and dignity. No employee will be subject to any physical, sexual, psychological or verbal harassment of abuse.																					
5. Nondiscrimination																					
No person will be subject to any discrimination in employment, including hiring, salary, benefits, advancement, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, or social or ethnic origin.																					
6. Health and Safety																					
Employers will provide a safe and healthy working environment to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of employer facilities.																					
Safety Equipment	**Fire Fighting (29CFR 1910.1200)**: Fire extinguishers must be inspected monthly for operability.	All safety and medical equipment (such as fire fighting equipment, first aid kits, etc.) shall be in place, maintained as prescribed and accessible to the employees.	Fire extinguishers lack maintenance tags indicating that they are inspected monthly for operability.				Monitors viewed noncompliance with safety equipment standards upon the visual inspection of the factory.			Set monthly inspection date, added follow up on monthly Audit Sheet, Fire Extinguisher and conducted 3 classes on how to use and test.	November 15, 2006	Same	All items completed by November 15, 2006		Completed	Completed and implemented with monthly audit checks and verifications.		COMPLETED - During inspection of facility it was noted that all fire extinguishers have inspection tags that have been signed off on a monthly basis. Inspection of fire extinguishers included in weekly Safety Inspections.	Fire Extinguisher Inspection Tags, Records of Safety Inspection Checklists		
	Medical Services and First Aid (29CFR 1910.151): Where eyes or the bodies of workers may be exposed to injurious corrosive materials, suitable facilities should be found within the work area for quick drenching or flushing of eyes and body.		Eye wash is missing in the battery charging area. Eye wash solution was found expired.				Monitors viewed noncompliance of safety equipment upon the visual inspection of the factory.			Refilled and/or purchased new solution bottles for each station, labeled all bottles with expiration date, relocated eye wash station to the area near forklift chargers, added monthly follow-up inspections on the 15th of each month.	November 15, 2006	Same	November 1, 2006		Completed	Completed and implemented with monthly audit checks and verifications		COMPLETED - It was noted during inspection of facility that an eye wash station was installed in the battery charging area. Eye wash solution was not expired. Inspection of the eye wash station is included in the weekly Safety Inspections.	Visual Observation, Records of Safety Inspection Checklists		
Chemical Management	**Hazardous Communication Program (29CFR 1910.1200)**: Chemicals must be properly labeled in the language spoken by workers. Label must note the identity of the chemical and the hazard warning (regarding health, flammability, reactivity and special hazard information).	All chemicals and hazardous substances should be properly labeled and stored in accordance with applicable laws. Workers should receive training, appropriate to their job responsibilities, in the safe use of chemicals and other hazardous substances.	Chemical containers were found unlabeled. Facility does not have a chemical labeling program to assure that all chemicals used outside of their normal containers are adequately labeled and kept in an appropriate container for operator use.				Monitors viewed noncompliance with chemical safety standards upon the visual inspection of the factory.			Ordered 3 types of labels for bottles, added monthly inspection to audit sheet, put on department check list for weekly inspections and labeled every bottle. New hires are trained when hired, and once a year updated training is conducted.	November 15, 2006	Same	November 15, 2006		Completed	Completed and implemented with monthly Audit checks and verifications.		ONGOING - During facility inspection was noted that 30% of chemical containers not labeled or label was illegible. Management implemented labeling program for all containers used on the production floor; however, tags fall off or written labels fade due to the ink removing properties of the substance contained in bottles. Chemical Labeling is part of weekly Safety Inspections.	Visual Observation, Records of Safety Inspection Checklists	Chemical labels on solvent containers have a tendency to degrade, becoming illegible and then falling off. Pre-printed labels and self-laminating labels have been purchased and are now being used to prevent this. This item will be covered in safety committee hazard inspections as well as internal FLA auditing procedures. An internal FLA safety audit is scheduled for February 24 and 25, 2011.	See attached photos of new labels that meet OSHA Hazard Communication Labeling Requirements.
Chemical Management	**MSDS (29CFR 1910.1200)**: Facility must provide current MSDS for all chemicals and chemical products on site. MSDS must be posted where chemicals are used/stored.		MSDS were present in the factory but were not posted where chemicals were stored and used.				Monitors viewed noncompliance with chemical safety standards upon the visual inspection of the factory.			Moved all MSDS books to visible location and made labels for each department to use and made sure all Dept Supervisors and Leads are aware of the location of MSDS book. New hires are trained when hired, and once a year updated training is conducted. MSDS sheets are kept in factory accessible to employees.	November 15, 2006	Same	November 1, 2006		Completed	Completed and Implemented.		COMPLETED - It was found that MSDS are available for all chemicals used in all departments on the production floor. Inspection of MSDS are included in the weekly Safety Inspection.	Visual Observation, Records of Safety Inspection Checklists		
Ventilation/Electrical/Facility maintenance	**Housekeeping-Safety (29CFR 1910.22)**: No spaces on the panel shall be kept open after removing an electric breaker. Plate covers shall cover all openings to prevent accidental electrocution. No obstruction shall block access to an electrical panel. 3 feet clearance should be maintained in front of all panels and electric storage devices.	All ventilation, plumbing, electrical, and lighting services shall be provided and maintained to conform to applicable laws and prevent hazardous conditions to employees in the facility	Electrical panels were found with missing covers. Electrical panels lacked 3 feet of clearance in front.				Monitors viewed noncompliance with electrical maintenance standards upon the visual inspection of the factory.			Purchased and replaced new plate covers. Check for proper space clearance. There is a factory maintenance supervisor responsible for daily maintenance.	November 1, 2006	Same	November 1, 2006		Completed	Completed and Implemented.		COMPLETED - All electrical panels were found covered. No electric circuits were exposed and all panels were accessible. Inspections of the electrical panels are included in the weekly Safety Inspection.	Visual Observation, Records of Safety Inspection Checklists		
Machinery Maintenance	**Powered Industrial Truck (29CFR 1910.22)**: There must be a daily maintenance procedure that is followed by workers to inspect vehicles prior to use.	All production machinery and equipment shall be maintained, properly guarded, and operated in a safe manner.	There is no daily maintenance procedure that is followed by workers to inspect vehicles prior to use.				Monitors looked for daily reports and informally interviewed workers to determine noncompliance with machinery maintenance standards.			Daily maintenance reports and inspections were implemented shortly after the audit findings.	November 6, 2007	Same	November 6, 2007		Completed	Completed and implemented.		COMPLETED - Daily Forklift Inspection Checklist is completed. Inspection of forklift inspections are included in the weekly Safety Inspections.	Daily Forklift Inspection Checklist. Records of Safety Inspection Checklist		
7. Freedom of Association and Collective Bargaining																					
Employers will recognize and respect the right of employees to freedom of association and collective bargaining.																					
8. Wages and Benefits																					
Employers recognize that wages are essential to meeting employees' basic needs. Employers will pay employees, as a base, at least the minimum wage required by local law or the prevailing industry wage, whichever is higher, and will provide legally mandated benefits.																					
9. Hours of Work																					
Except in extraordinary business circumstances, employees will (i) not be required to work more than the lesser of (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture or, where the laws of such country will not limit the hours of work, the regular work week in such country plus 12 hours overtime; and (ii) be entitled to at least one day off in every seven day period.																					
10. Overtime Compensation																					
In addition to their compensation for regular hours of work, employees will be compensated for overtime hours at such premium rate as is legally required in the country of manufacture or, in those countries where such laws will not exist, at a rate at least equal to their regular hourly compensation rate.																					
Miscellaneous																					