



2010

## FAIR LABOR ASSOCIATION INDEPENDENT EXTERNAL MONITORING REPORT

**COMPANY:** Nike, Inc.  
**COUNTRY:** Mexico  
**FACTORY CODE:** 0702501258I  
**MONITOR:** Accordia Global Compliance  
Group  
**AUDIT DATE:** December 8, 2010  
**PRODUCTS:** Fabric  
**PROCESSES:** Tissue, Cutting  
**NUMBER OF WORKERS:** 112



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## **Wages, Benefits and Overtime Compensation: Accurate Length of Service Calculation**

WBOT.18 All workers shall be credited with all time worked for an employer for purposes of calculating length of service to determine the benefits to which workers are entitled. (S)

### **Noncompliance**

**Explanation:** During review of documentation, monitor found that factory ends the working relationship in December of each year and then rehires the same workers in January of the following year. The facility does not respect seniority, vacations and housing benefits. Workers are incorrectly paid liquidation when the correct practice is to issue those employees a final settlement based on original hire date. Federal Labor Law 50.

**Plan Of Action:** Factory must implement full time contracts for all employees with permanent intent to remain within the business. As per Nike Code of Leadership Standards (CLS): Fair Treatment: Treat employees fairly and provide same terms and conditions of employment as national employees, including compensation, holidays, leaves of absence and any employer-provided housing, except where country law requires different benefits (for example, with respect to payment of social security benefits). As employer, contractor is responsible for employment relationship with its employees. Contractor shall comply with the higher of the applicable country law or these CLS.

Contractor must adhere to minimum standards below in the Contents of Written Employment Agreement, which must, according to Article 25 of Federal Labor Law, contain, at a minimum:

- a) Name, age, nationality, sex, marital status and address of worker and employer;
- b) If labor relationship is for specific project, task or term, or for an indeterminate term;
- c) Service(s) to be provided, to be described with as much precision as possible;
- d) Place(s) where services are to be performed;
- e) Daily hours worked;
- f) Form and amount of wages;
- g) Day and place of payment of wages;
- h) An indication of occupational training to be given to worker;
- i) Other employment conditions, such as rest days, vacation, leave and other terms agreed to by worker and employer.

Employee must receive, sign and acknowledge the employment contract and employee handbook. Handbook must outline areas like holiday entitlement, wage payment policy, overtime policy, national insurance contributions. Please see Nike CLS for further details. Also, i) commitment that seniority and other related benefits will be part of final settlement; ii) naming someone accountable or responsible for assuring all worker benefits and entitlements are being tracked and paid in accordance with the local law. Factory management to consider pay of any worker entitlements retroactively.



**Deadline Date:** 04/28/2011

**Action Taken:**

**Plan Complete:** No

**Plan Complete Date:**

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### **Forced Labor: General Compliance Forced Labor**

F.1 Employers shall comply with all local laws, regulations and procedures concerning the prohibition of forced labor. (S)

#### **Noncompliance**

**Explanation:** During documentation review it was found that an Internal Regulation Handbook has not been established. Federal Labor Law 425

**Plan Of Action:** Factory shall create and implement factory rules and regulations booklet, carefully staying within local/legal guidelines. Implementation shall include employee acknowledgement, training, regular updates and communications explaining all updates and regulations amendments. Factory should always consider workers' rights when considering rules and regulations. As per Nike CLS, Contractor shall adopt and adhere to rules and conditions of employment that respect its employees and, at a minimum, safeguard their rights under country and international labor and social security laws and regulations. Factory must communicate and train its employees on rules and regulations at time of employment. Factory is required to communicate the rules in the language locally spoken by its employees and any additional languages.

**Deadline Date:** 04/29/2011

**Action  
Taken:**

**Plan Complete:** No

**Plan Complete  
Date:**

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### **Forced Labor: Employment Terms/Voluntary Agreement**

F.3 Employment terms shall be those to which the worker has voluntarily agreed, in as far as those terms do not fall below provisions of local laws, freely negotiated and valid collective bargaining agreements, or the FLA Code. (P)

#### **Noncompliance**

- Explanation:**
1. During document review it was noted that company hires all workers on a temporary basis (30 days) without a legal justification. Every month, facility stamps the contracts with revised expiration dates, which are then signed by employees. Federal Labor Laws 35, 36 & 37
  2. Factory does not provide employees with original copy of labor contract. Federal Labor Law 24
  3. Monitor found 5 cases in a sample of 25 in which the labor contracts were not signed by the legal representative of the company. Federal Labor Law 24

- Plan Of Action:**
1. Factory must implement full time contracts for all employees with permanent intent to remain within business. As per Nike CLS: treat employees fairly and provide same terms and conditions of employment as national employees including compensation, holidays, leaves of absence and any employer-provided housing, except where country law requires different benefits (i.e., with respect to payment of social security benefits) Like the employer, contractor is responsible for employment relationship with its employees. Contractor shall comply with higher of applicable country law or the CLS.



Contractor must adhere to minimum standards in Contents of Written Employment Agreement below, which must contain, according to Article 25 of Federal Labor Law, at a minimum:

- a) Name, age, nationality, sex, marital status and address of worker and employer;
- b) If labor relationship is for specific project, task of term or for an indeterminate term;
- c) Service(s) to be provided, to be described with as much precision as possible;
- d) Place(s) where services are to be performed;
- e) Daily hours worked;
- f) Form and amount of wages;
- g) Day and place of payment of wages;
- h) An indication of occupational training to be given to worker;
- i) Other employment conditions, such as rest days, vacation, leave and other terms agreed to by worker and employer.

Employee must receive, sign and acknowledge employment contract and handbook. Handbook must outline areas like holiday entitlement, wage payment policy, overtime policy, national insurance contributions. Please see Nike CLS for further details.

2. Factory must ensure that they immediately deliver and issue all employees with a signed copy of labor contract within the timescale advised.

3. 5 employees are currently left with no association to factory if legal proceedings were to happen.

Factory must immediately issue contracts completed properly. All contracts must have legal representative signature. Management shall ensure a) someone is accountable or responsible for overseeing issuance of full time contracts to active employees and new hires and b) all workers provided with manager signed contract copy.

**Deadline Date:** 04/28/2011

**Action Taken:**

**Plan Complete:** No

**Plan Complete Date:**

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**Code Awareness:**

GEN.2 Ensure that all Company factories as well as contractors and suppliers inform their employees about the workplace standards orally and through the posting of standards in a prominent place (in the local languages spoken by employees and managers) and undertake other efforts to educate employees about the standards on a regular basis.

**Noncompliance**

- Explanation:**
- 1. Monitor did not find any posting of Nike, Converse or Umbro Codes of Conduct (COC) or that of the Fair Labor Association.
  - 2. Monitor did not find evidence that factory trains workers on Nike, Converse, Umbro or FLA COCs at any point, from hiring, or throughout longevity of workers' employment.

- Plan Of Action:**
- Factory has received Umbro COC. Factory also received and signed Umbro Manufacturing Authorization with clear instructions to:
- a) Post Umbro CLS in workshop, dormitory and canteen, etc. Policy can be part of worker handbook; hard copy should be given to every workers.
  - b) Review Umbro CLS for worker training needs and develop training materials.
  - c) Initiate worker awareness training to all on board and to newly hired employees.
  - d) Develop training contents by incorporating Umbro CLS, worker rights/benefits and their responsibilities.
  - e) Incorporate Umbro CLS into worker handbook and issue 1 to each worker by obtaining signatures.
  - f) Training calendar to be developed to conduct training sessions with workers from all departments.
  - g) Maintain training records through proper documentation which includes trainee attendance list, photographic evidence, etc.
  - h) Department heads to ensure worker participation to avoid absenteeism through postings and meetings.
  - i) HR Department to randomly interview workers to check their awareness level on training topics to identify refresher training needs.
  - j) Management to review weekly training records to maintain a steady progress level.

**Deadline Date:** 03/31/2011

**Action Taken:**

**Plan Complete:** No

**Plan  
Complete  
Date:**

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**Code Awareness:**

GEN.3 Develop a secure communications channel, in a manner appropriate to the culture and situation, to enable Company employees and employees of contractors and suppliers to report to the Company on noncompliance with the workplace standards, with security that they shall not be punished or prejudiced for doing so.

**Noncompliance**

**Explanation:** Monitor did not find evidence of a confidential communication channel for use by workers to report noncompliance to the codes of Nike, Converse or Umbro.

**Plan Of  
Action:** Umbro does not currently possess a secure communication policy with its suppliers. However, with this in mind, we are currently and actively looking into developing a program with Nike. Team member from External Partnerships Department will discuss communication channel with leadership by end of FY11 and attempt to incorporate a new program for FY12. In the meantime, Umbro and Converse field team will attempt to establish communication channel by offering business cards containing email, address, telephone and fax numbers for employees to consider if confidential communication is required.

**Deadline  
Date:** 03/31/2011

**Action  
Taken:**

**Plan  
Complete:** No

**Plan  
Complete  
Date:**

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## Health and Safety: Evacuation Requirements and Procedure

H&S.9 All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, the installation and maintenance of an employee alarm and emergency lighting systems, ensuring aisles/exits are not blocked and that workers are not blocked within their workstations, employee education, evacuation procedures, etc.) shall be complied with. Workers shall be trained in evacuation procedures. Alarm systems shall be regularly tested and evacuation drills shall be undertaken at least annually. (S)

### Noncompliance

**Explanation:** 1. Monitor's inspection of factory found that emergency exit located in cutting area is unusable at all times. This exit was found locked with a padlock; 20 workers are affected, with nearest emergency exit approximately 30 meters in distance. NOM-002-STPS-2000. 9.1.3.

2. During review of fire management documents it was noted that an annual fire drill has not been conducted. Last evacuation drill performed by factory November 13, 2009. Federal Rules of Safety, Health and Environment in the Workplace 28.

**Plan Of  
Action:**

1. Contractors must provide employees the safest practical workplace, free from potential fire hazards. Contractors must reduce or eliminate fire in the workplace by heightening fire safety awareness of all employees. Contractors must provide all employees with information necessary to recognize hazardous conditions and to take appropriate action before such conditions result in a fire emergency.

Contractors to maintain improved level of fire protection and reduced level of risk by:

- a) Designing factories using fire-resistant materials or those of limited combustibility.
  - b) Providing and maintaining adequate corridors, exits, and fire barriers (including door assemblies, dampers, and windows).
  - c) Controlling presence and use of ignition sources and combustibles within facility.
  - d) Conducting routine fire inspections to identify fire hazards and areas that are not sufficiently protected.
  - e) Conducting periodic inspections, tests, and maintenance of fire and life safety equipment and systems to ensure that they operate properly.
- Contractors must comply with the more restrictive recognized standard of either their nation's legal or health requirements or this Nike Standard.

2. Umbro insists factory conduct fire training and drill at least once yearly; once training and drill has been conducted, registers should be kept and drill should be documented for a 3-year period. Umbro suggests factory develop and implement Health, Safety and Environment (HSE) Committee processes and procedures to improve health, safety and environment conditions in each facility; the committee should manage these functions.

**Deadline** 03/31/2011  
**Date:**

**Action**  
**Taken:**

**Plan** No  
**Complete:**

**Plan**  
**Complete**  
**Date:**

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### **Health and Safety: Safety Equipment and First Aid Training**

H&S.10 All safety and medical equipment (such as fire fighting equipment, first aid kits, etc.) shall be available in sufficient numbers throughout the factory, maintained and stocked as prescribed and easily accessible to workers. A sufficient number of workers shall be trained in first aid and fire fighting techniques. (S)

#### **Noncompliance**

**Explanation:** 1. Monitor found expired medicine in first aid kits in “circulares” area. This first aid kit was found to be missing necessary supplies. Federal Labor Law 132-XVII.

2. During factory inspection monitor found 3 fire extinguishers obstructed by fabric rolls in the cutting area. NOM-002-STPS-2000 9.2.3

**Plan Of**  
**Action:** 1. Factory HSE Committee must appoint responsible qualified first aid personnel and establish, maintain and administer first aid processes and procedures. Occupational health concerns must receive highest priority. Factory must a) be able to adequately respond to first aid events and resolve all other occupational health problems quickly and b) develop and implement written medical and first aid program specific to factory. Nike CLS must be implemented as minimum requirement for medical services/first aid.

2. HSE Committee shall conduct regular walk around assessments ensuring that factory grounds complies with Nike CLS. Objects blocking aisles or fire fighting equipment shall be identified and policies shall be implemented to ensure that all employees fully understand how to store and maintain in the future.

**Deadline** 03/25/2011  
**Date:**

**Action**  
**Taken:**

**Plan** No  
**Complete:**

**Plan**  
**Complete**  
**Date:**

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### **Health and Safety: Personal Protective Equipment**

H&S.11 Workers shall be provided with effective and all necessary personal protective equipment (such as gloves, eye protection, hearing protection, respiratory protection, etc.) to prevent unsafe exposure (such as inhalation or contact with solvent vapors, noise, dust, etc.) to health and safety hazards, including medical waste. (S)

#### **Noncompliance**

**Explanation:** During factory inspection, monitor found that workers are not using ear protection in “rectilineas, circulares and compresores” areas. Monitor confirmed that factory provides each worker with 1 pair of earplugs annually. NOM-017-STPS-2008

**Plan Of** Factory should follow Nike CLS standards to implement PPE control measures. Factory  
**Action:** must ensure workers follow PPE requirements within relevant areas. Identification of hazardous areas is required to establish need for relevant equipment. Employee training shall be conducted in order to maintain frequent use. During next HSE Committee meeting, factory HSE representative shall either take the role of or appoint the appropriate person to enforce PPE control measures. Management should also consider using reward schemes to promote PPE usage- bonuses, extra benefits, etc.

**Deadline** 03/31/2011  
**Date:**

**Action**  
**Taken:**

Plan No  
Complete:

Plan  
Complete  
Date:

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### Health and Safety: Chemical Management and Training

H&S.13 All chemicals and hazardous substances shall be properly labeled and stored in accordance with applicable laws. Labels shall be placed in the local language and the language(s) spoken by workers, if different from the local language. Workers shall receive training, appropriate to their job responsibilities, concerning the hazards, risks and the safe use of chemicals and other hazardous substances. (S)

#### Noncompliance

**Explanation:** During factory tour, monitor found 2 beverage containers in production areas, unlabeled, storing electronic degreaser. Federal Rules of Safety, Health and Environment in the Workplace 65.

**Plan Of Action:** Factory is required to develop and implement processes and procedures for hazardous materials and chemical storage. Managers and Supervisors must ensure employees are trained and adhere to requirements of hazardous material processes and procedures. All employees must officially attend and acknowledge such training. Umbro requires factory to risk assess each individual potential risk product and identify risks according to Nike CLS, once identified, implement measure chemical management/storage plan.

#### Chemical container and hazardous material storage requirements:

- a) Containers must be in good condition.
- b) Containers must be appropriate and compatible for designated use.
- c) All primary and secondary containers must have labels that indicate chemical name and hazards. Labels must be in language of employees, readable and in good condition.
- d) Container lids must be closed at all times, except when in use.
- e) All primary flammable material containers must be bonded and grounded.

Training must be provided to all workers and documented.

**Deadline Date:** 03/30/2011

**Action  
Taken:**

**Plan**            **No**  
**Complete:**

**Plan**  
**Complete**  
**Date:**

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### **Health and Safety: Ventilation/Electrical/Facility Installation and Maintenance**

H&S.17 All necessary ventilation, plumbing, electrical, noise and lighting services shall be installed and maintained to conform to applicable laws and in such a manner as to prevent or minimize hazardous conditions to workers in the facility. (S)

#### **Noncompliance**

**Explanation:** 1. During documentation review it was noted that noise and lighting analysis has not been conducted in production areas. NOM-011-STPS-2001. Federal Rules of Safety, Health and Environment in the Workplace 95.

2. During factory tour, monitor found 5 electric panels (2 in tissue department, 3 in cutting area) missing required posted voltage; all 5 electric panels were found uncovered. Federal Rules of Safety, Health and Environment in the Workplace 47.

**Plan Of  
Action:** 1. Factory must establish HSE Committee with at least monthly meetings. One key topic to discuss is monitoring of hazardous conditions. Factory should introduce a program to identify hazardous areas and assess associated danger. In the meantime, factory must contact local authorized 3rd party assessors to conduct noise and lighting tests and establish need for relevant PPE.

2. Factory HSE Committee should concentrate efforts on developing and implementing processes and procedures to reduce or eliminate risks associated with electrical hazards. Umbro requires factory to risk assess each individual electrical unit and identify risks according to Nike CLS, once identified, implement measure to reduce and control risk involved.



Factory also required to create electrical safety program/policy. Policy should state minimum requirements:

- a) Only trained and authorized employees may conduct repairs to electrical equipment.
- b) Individuals performing work on energized electrical circuits must hold appropriate qualifications and be specifically authorized to perform such work.
- c) Electrical distribution areas must be guarded against accidental damage (specifically designed rooms, using substantial guard posts and rails, etc.).
- d) Access to electrical distribution rooms must be restricted to authorized employees.
- e) All electrical distribution panels, breakers, switches and junction boxes must be completely enclosed and protected from wet conditions.
- f) All electrical control devices must be labeled to identify equipment controlled. All distribution panels must have 0.9 meter (3 feet) clearance.
- g) All conduits must be fully supported throughout their length. Non-electrical attachments to a conduit are prohibited.
- h) All electrical wiring and cables must be in good condition (no exposed circuits).
- i) Extension cords must be used on temporary basis only.
- j) Ground Fault Circuit Interruption (GFCI) must be provided for wet locations.
- k) Site specific electrical safety rules must be available.

**Deadline**

**Date:**

**Action**

**Taken:**

**Plan** No

**Complete:**

**Plan**

**Complete**

**Date:**

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## Health and Safety: Medical Facilities

H&S.21 Medical facilities shall be established and maintained in factories as required by applicable laws. Medical staff shall be fully licensed and recognized under applicable local rules and regulations. An appropriate number of medical staff shall be on duty during all working hours, including any type of overtime, as required under local law. An appropriate stock of medical supplies shall be maintained at all times. Medicines of which the expiration date has passed must be replaced immediately and disposed of in a safe manner. (P)

### Noncompliance

**Explanation:** During factory inspection it was noted that facility is lacking an adequate area for the Internal Medical Service. Facility provides medical services in archive area with the participation of 1 doctor 2 days a week, Monday and Thursday. Federal Labor Law 504

**Plan Of Action:** Factory should ensure sufficient dedicated space has been allocated for use of medical services, potential staff and medical action. Space should ideally be an allocated room or section within factory.

Factory should ensure the following requirements are adhered to:

1. Risk Assessment: Each facility must have a documented risk assessment performed which includes as a minimum:

- a) Identification of hazards and locations that could result in an incident.
- b) Evaluation of risk associated with hazards (include number of employees at each location).
- c) Identification of control measures to reduce the risk (e.g., first aid supplies, equipment and personnel).

2. Policies and Procedures: Each facility must have implemented first aid procedures which must cover as a minimum, the following:

- a) Resources available (internally or externally) to respond to any medical emergency.
- b) Emergency telephone numbers must be conspicuously located by each telephone.
- c) Location and availability of medical facilities and emergency services.
- d) Records of first aid and medical treatments must be maintained.

3. First Aid Responders: Each facility with certified first aid responders must meet the following minimum requirements:

- a) Adequate number of trained responders to cover number of employees and hazards at facility.
- b) Communicate to employees the names, locations, and contact information for certified first aid responders.
- c) Maintain required first aid certifications.

4. First Aid Materials: Each facility must have first aid materials (first aid kits, AED, stretcher, etc.) available based on the risk. First aid kits must contain at a minimum:

- a) Sterile adhesive bandages (assorted sizes);
- b) Absorbent compress;
- c) Sterile eye pads;
- d) Triangular bandages;
- e) Burn treatment;
- f) Disposable gloves;
- g) Visible signage for first aid boxes and equipment;
- h) Monthly inspection and replenishment to meet minimum content requirements.

5. Eye Wash And Body Flush Equipment: When there is a risk of chemical exposure to eyes, face or body, eye wash or body flush equipment is required, the equipment must meet the following minimum requirements:

- a) Water must be potable (drinkable);
- b) Velocity of water is such that no injury occurs;
- c) Minimum flow rate: 1.5 L for a minimum of 15 minutes;
- d) No sharp projections;
- e) Nozzles covered to prevent airborne contamination;
- f) Control valve easily located and when activated remains on until turned off;
- g) Within 30m (100 ft) of hazardous material;
- h) Accessible and identifiable with a highly visible sign;
- i) Water nozzles positioned between 83.8 cm (33 in) and 114.3 cm (45 in) from floor;
- j) Self-contained units with flushing fluid reservoir must be constructed of materials that will not corrode. Flushing fluid must be protected from airborne contaminants;
- k) Water temperature in units must be maintained between 15 – 35°C (60 – 90°F);
- l) All equipment and piping must be freeze protected;
- m) Plumbed eye wash units must be activated weekly to flush line and verify proper operation.

Self-contained units must be inspected according to manufacturers' specification.

**Deadline Date:** 08/25/2011

**Action Taken:**

**Plan Complete:** No

**Plan Complete Date:**



## Health and Safety: Sanitation in Factory Facilities

H&S.22 All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with all applicable laws, including relevant sanitation, medical and safety and health regulations. (S)

### Noncompliance

**Explanation:** 1. During factory tour, monitor found employees consuming food in male dresser room in cutting area. Monitor interviewed those workers eating in dresser room and cutting area, they all agreed that facility does not provide sufficient chairs and tables in canteen area. With the 2 rest periods provided, employees double the capacity of canteen area; approximately 50 workers with a capacity for 25. Federal Rules of Safety, Health and Environment in the Workplace 104.

2. During inspection of bathrooms, monitor found that male bathrooms located in “circulars” area are unsanitary; 34 workers affected. [Employee name], HR Manager, commented that they will verify that toilet cleaning is done consistently throughout day. Federal Rules of Safety, Health and Environment in the Workplace 108.

3. During factory tour, monitor noted that production areas are unorganized and unkempt. Monitor observed fabric, boxes, finished product, and garbage scattered throughout production area. This debris poses a fire risk, along with the possibility that safe evacuation may not occur, and that employee injury or accident could result due to facility’s disorder. Federal Rules of Safety, Health and Environment in the Workplace 23.

**Plan Of Action:** Factory manager should develop plan to increase total number of seats and tables within canteen. If this is not physically possible, then management will have to consider having separate lunch times, i.e., Group 1) 12-1pm, Group 2) 1-2pm. All employees must receive adequate seating and table facilities. Factory should review Nike CLS standards regarding general work environment. HSE Representative must establish, maintain and administer workplace environment policy and procedures, including toilet cleaning and maintenance. Thorough cleaning schedule/program must be established and agreed upon amongst cleaning staff immediately. Acknowledgement and signature of each staff member after the toilet is cleaned is required. Please show evidence.



Factory HSE Committee must follow the requirements below in order to ensure the employee workstations and surrounding areas are safe environments to work within. Each facility must ensure that all areas where employees and contractors work or travel are kept clear of hazards. At a minimum, they must:

- a) Keep all places of employment clean, dry and in a good state of repair.
- b) Maintain walkways clear of tripping hazards and other obstructions.
- c) Provide minimum clearance of 0.9 m (3 ft) for all electrical panels, eye wash/shower stations and other emergency equipment.
- d) Keep storage areas orderly at all times. Materials may not be stacked within 45 cm (18 in) of ceiling or fire sprinklers (whichever is lower).
- e) Spills must be cleaned immediately and waste disposed of properly (warning signs should be used on wet floor).
- f) All windows and transparent surfaces in doors must be protected from breakage. Where is risk of people walking into transparent doors or partitions, must be marked.

Exits: Each facility must provide safe means of exit from fire and other emergencies: At a minimum, they must:

- a) Be arranged and mark exit paths so that route of escape to safety is unmistakable.
- b) Mark all doorways or passageways that do not lead to a safe exit as "No Exit." Passageways that dead end and do not lead to safe exit may not be longer than 16.67 m (50 ft).
- c) Maintain exits for free and unobstructed egress from all parts of building. No door or passageways may be locked or fastened to prevent escape.
- d) Arrange exits so that at least 2 different paths from every workplace (may include building, structure, section or area) provide alternate means of escape in event of an exit being blocked by fire or other emergency.

Lighting: Each facility must provide adequate lighting for safe working conditions.

Stairs and Stairways: Each facility must provide for safe passage up and down stairs and stairways. At a minimum, they must provide:

- a) Standard railings (for 4 steps or more).
- b) Minimum width of 0.56 m (22 in).
- c) Treads with slip-resistant surface.
- d) Uniform step height and width throughout any flight of stairs.

**Deadline Date:** 06/24/2011

**Action Taken:**

**Plan Complete:** No



**Plan  
Complete  
Date:**

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