2010

Fair Labor Association
Independent External Monitoring Report

COMPANY: Team ProMark, LLC
COUNTRY: United States
FACTORY CODE: 111008247074I
MONITOR: Accordia Global Compliance Group
AUDIT DATE: November 15 – 16, 2010
PRODUCTS: Automobile Emblems
PROCESSES: Injection Molding, Printing, Assembly, Packing
NUMBER OF WORKERS: 51

For an explanation on how to read this report, please visit the FLA website here.

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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:	Monitor did not find a code posted in the facilities. Monitor did not find evidence that Team ProMark (TP) has provided training and information to the factory regarding the code. Workers did not have knowledge, awareness or comprehension about the code based on interviews with the monitor. Monitors' interviews with management and workers did not indicate that training on code awareness has been done.
Plan Of Action:	1. The Team ProMark Code of Conduct has been posted in the workplace for [Factory name] employee reference. This step is complete as of February 1, 2011. 2. The orientation procedures for employees will be updated to include an awareness review of customer conduct standards, including a review of the TP Code of Conduct. The target date for completion of this task is March 1, 2011.
Deadline Date:	03/01/2011
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:	Facility has not conducted an emergency evacuation drill within the past 12 months according to management and worker interviews.
Plan Of Action:	A review of known OSHA standards by [Factory name] could not confirm a requirement for regular conduct of an evacuation drill. Currently, an evacuation plan is posted at multiple locations throughout the workplace; the plan is reviewed with all employees at the time of hire. This practice is already in place and was at the time of the conducted audit. Going forward, formal safety training with all active employees will be conducted on an annual basis and a review of evacuation plans will be made a regular aspect of the training curriculum.
Deadline Date:	07/01/2011
Action Taken:	
Plan Complete:	No
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 that no first aid training and certification of any workers has been conducted. 29CFR1910.151

2. Monitor found that no fire extinguisher training has occurred. Annual training is required by OSHA 29CFR1910.157.

3. Monitor found inadequate first aid supplies in the main facility (molding) by inspection of first aid kits. 29CFR1910.151

4. Monitor found that there is no eye wash equipment for use by workers near the fork truck battery-charging station. 29CFR1910.151

Plan Of Action: 1. This requirement was reviewed in light of the referenced OSHA requirement, and with the [Factory name] business insurance carrier. It was confirmed that contrary to the request, training or certification of any workers in first aid or CPR at [Factory name] is NOT a requirement. Specifically, as detailed on www.osha.gov, "Employers are required by OSHA 29 CFR 1910.151 to have a person or persons adequately trained to render first aid for WORKSITES THAT ARE NOT IN NEAR PROXIMITY TO AN INFIRMARY, CLINIC, OR HOSPITAL." The business insurance carrier confirmed this, stating that since an urgent care provider is within 15 minutes of the facility at all times, this requirement does NOT exist for [Factory name]. Given this position and the lack of a requirement, [Factory name] has chosen NOT to provide training to any employees in first aid or CPR to limit potential legal liability in administering the same.

2. Contrary to the stated finding, fire extinguisher training IS conducted with all new hires, and this fact was discussed with the auditors at the time of the audit summary. Documentation is maintained for all employees of such training. However, we do not currently conduct annual training of the same. Going forward, formal safety training with all active employees will be conducted on an annual basis, and a review of fire extinguisher use will be made a regular aspect of the training curriculum. The target date for completion of this task is July 1, 2011.

3. First aid kits have been reviewed for deficiencies as compared to the requirements specified in ANSI Z308.1-2003. Such deficiencies will be corrected, with a target completion date of March 1, 2011.

4. An emergency eye wash station will be placed near the fork lift charging station, with a target completion date of March 1, 2011.

Deadline Date: 03/01/2011

Action Taken:

Plan Complete: No

Plan Complete Date: