2010

Fair Labor Association
Independent External Monitoring Report

COMPANY: Top of the World, LLC
COUNTRY: United States
FACTORY CODE: 3800821242I
MONITOR: Accordia Global Compliance
AUDIT DATE: December 11, 2010
PRODUCTS: Headwear
PROCESSES: Embroidery, Packaging
NUMBER OF WORKERS: 35

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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:	All workers in the sample of 5 did not have knowledge, awareness or comprehension of the code based on interviews with the monitor.
Plan Of Action:	Address employee training mechanism with HR staff. Implement quarterly training for existing facility staff as well as for new hire orientation element to ensure all staff is adequately informed of the code elements.
Deadline Date:	11/22/2010
Supplier CAP:	This has been addressed upon findings during the audit. Implementation of the training programs will begin during the spring of 2011. CAP developed November 2010.
Supplier CAP Date:	11/22/2010
Action Taken:	At the time of the audit a copy of the Code of Conduct (COC) was in place in a high traffic area for employees to see in both buildings on the premises. Since the audit we have made sure to point out the location of the COC to all employees on staff as you can see from a copy of the agenda from our December company meeting. Also, we have since added a copy of the COC to our Standard Operating Procedures (SOP) to go over with every new employee during orientation. Each employee signs off that they have read and understand this SOP manual. We will continue to point out the location of the COC to employees each quarter during one of our monthly company meetings
Plan Complete:	Yes
Plan Complete Date:	12/06/2010

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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 inspected 5 emergency lights in facility. One, at east wall employee entrance, found inoperable. Additionally, monitor found that warehouse had 2 emergency lights for an area of approximately 10,000 sq ft. Though both tested were found operating, they may not provide adequate lighting for the paths of egress due to 1) height of location on wall (approximately 15 – 20 feet) and 2) obstruction posed by stacked cartons in path of the light source. 4 workers were observed working in area at southeast corner of warehouse that potentially could be affected. The requirement for this is set by the NFPA (National Fire Protection Association) 101: Life Safety Code at an average of 1 footcandle (fc).

Note: 1 footcandle is the amount of light hitting a surface from 30 degrees above the horizontal plane of the surface. 29CFR1910.37 and NFPA 101 Life Safety Code

2. Monitor inspected facility's emergency exit areas and path of egress. One area at northeast corner of warehouse and one at northwest area of warehouse found with restricted/limited path of egress. Cardboard cases of product and steel/wood shelving materials were found that restricted aisles to less than the 36 inch width required by fire code. 29CFR1910.36

Plan Of Action: The emergency lights have all been inspected and we have replaced the faulty ones. TOW has scheduled electricians to install new exit lights in 1st quarter of 2011 (currently scheduled for 1st week in March). Exit lights obstructed and 15 – 20 feet up on the wall will be lowered by electricians in March, and all products have been moved. Area has floor tape to indicate that it stays clear of obstructions. All exits have been marked with floor tape to clearly define areas that must remain clear of obstructions.

Deadline Date: 11/22/2010

Supplier CAP: All findings have been addressed upon completion of the audit. Implementation of corrective action was immediate as well, as during March 2011 installation of new lighting system was completed. CAP developed November 2010.

Supplier CAP Date:	11/22/2010
Action Taken:	Lights have been added and repaired. Invoice uploaded as document of proof. Aisles were adjusted where excess freight was located to be more than 36".
Plan Complete:	Yes
Plan Complete Date:	12/18/2010

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 workers are trained in First Aid. 29CFR1910.151 2. Two fire extinguishers were found with access blocked (north wall of warehouse). No other fire extinguishers were present. The area of the wall measures approximately 30 feet in distance.
Plan Of Action:	Staff First Aid Training modules will be developed for 2011 quarterly training program by our facility's HR staff. Implementation will begin during the spring of 2011. Regarding Item #2, access to each fire extinguisher was corrected and workers were reminded of the need to maintain this open access at all times, during an immediate meeting as well as in departmental and company-wide meetings held in December 2010.
Deadline Date:	11/22/2010

Supplier CAP:	Implementation of the First Aid Training will begin Spring 2011. Training on fire extinguisher access has been completed and will occur during quarterly health and safety training module. CAP developed November 2010.
Supplier CAP Date:	11/22/2010
Action Taken:	At the time of the audit, access to 2 of our fire extinguishers was found to be blocked. This problem was immediately corrected. We also mentioned this problem during our next company meeting as you can see in the agenda attached. Part of our new employee orientation has been directions on use and maintenance of fire extinguishers. I have attached copies from our employee handbook of this. At the time of the audit, I, [Employee name] the HR director, was working from home in preparation to give birth to my daughter which occurred just 6 days after the audit on November 28, 2010. Since the audit, we have added basic first aid and CPR material to our Standard Operating Procedure, which I have attached below. We have also been working with the local technology center to schedule a basic first aid and CPR demonstration to all of our employees during our August company meeting. We have contracted with [Center name] to start First Aid and CPR courses, paid for by Top of the World, for any employee that would like to become certified in first aid and CPR. We should have a start date for first 10 employees on August 5, 2011 and will train 10 at a time; a minimum of 20 employees is our goal. 10 will be mandatory for the 7 areas of facilities. September Class Dates/Times: Friday, September,16, 2011 8:30 a.m. - 4:00 p.m.
Plan Complete:	Yes
Plan Complete Date:	12/06/2010