

2010

FAIR LABOR ASSOCIATION INDEPENDENT EXTERNAL VERIFICATION REPORT*

COMPANY: Wilson Sporting Goods
COUNTRY: United States
FACTORY CODE: 830082883GV
MONITOR: Accordia Global Compliance

Group

AUDIT DATE: November 3, 2010 **PRODUCTS:** Footballs

PROCESSES: Warehouse and Production
NUMBER OF WORKERS: 53

FLA Comment: This report was submitted with a corresponding corrective action plan to the FLA and was reviewed by FLA staff. In an effort to improve the effectiveness of remediation, the FLA has provided feedback and recommendations to the company. The FLA has not yet received a response from the company. Therefore, the report is posted in its current state and will be updated once a finalized report has been received.



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Code Awareness:

GEN.1 Establish and articulate clear, written workplace standards. Formally convey those standards to Company factories as well as to licensees, contractors and suppliers.

Noncompliance

Explanation: Monitor inspected the facility for presence of documentation via postings or communications from the Company that would explain the workplace standards. Additionally, monitors interviewed workers to determine if the workplace standard has been established or explained to them and to assess their understanding of the workplace standard. Monitor did not find documented evidence of a posting or through memorandums from the Company communicating the standard.

> Monitor's interviews with workers corroborated this finding, as there were no workers found in the sample of 15 who could claim awareness of the standard. These actions and lack of evidence indicates that the company has not effectively established written workplace standards as required under the FLA's company obligations.

Plan Of Action: The applicable facility, at the time of this audit, already had well established written workplace standards. ***FACTORY NAME*** conducts its operations concerning working conditions, minimum age standards, wages and similar conditions in accordance with its ethical issues policy.

In order to better articulate its workplace standards and to ensure that factory employees are made aware of the workplace standards, a copy of the workplace standards will (1) be conspicuously posted in a prominent place where employees have access (2) be provided to the worker's union which will inform worker's orally of the workplace standards on at least an semi-annual basis.

Deadline

12/31/2008

Date:

Action This has been completed. No further action taken.

Taken:

Plan Yes

Complete:

Plan 12/31/2008

Complete Date:



Action

Yes

Verified:

Action Verified

Text:

COMPLETED: Monitor found that the company had posted the Code of Conduct. The Code was found posted on the employee communication board where workers enter

into the factory (from the hallway where the time clock is located).

Action

11/03/2010

Verified Date:

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: Factory employees are not aware of workplace standards. The company has not

undertaken efforts to educate employees about the workplace standards.

Plan Of

Action:

The applicable facility, at the time of this audit, already had well established written workplace standards. ***FACTORY NAME*** conducts its operations concerning

working conditions, minimum age standards, wages and similar conditions in accordance

with its ethical issues policy.

In order to better articulate its workplace standards and to ensure that factory employees are made aware of the workplace standards, a copy of the workplace standards will continue to be conspicuously posted in a prominent place where employees have access. Additionally, new hire materials will contain workplace standards/Code of Conduct and employees will be educated on the same at quarterly

meetings.

Dead	line
Date:	

Action

Taken:



Ρ	la	n

Complete:

Plan

Complete

Date:

Action Verified:

No

Action Verified PENDING: Workers were not able to confirm awareness of the Code. Monitor did not find evidence that Wilson has provided training and information to the factory regarding

Text: the Code. Code is posted, only.

No training records were provided to the Monitor from the company to indicate that training has occurred. Workers did not have knowledge, awareness or comprehension

about the code based on interviews between 8 workers and the Monitor.

Action Verified 11/03/2010

Verified Date:

Follow-up Plan of Action: Effective April 26, 2011: Workplace standards/Code of Conduct added to New Hire materials and employees will be educated on the same at quarterly meetings.



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: The facility has not developed a secure communications channel to allow employees to

report to the Company on noncompliance with the workplace standards without fear of

retribution.

Plan Of

Action:

It should be noted that the applicable facility is a wholly owned facility of Wilson. All Wilson employees, employees of contractors, and suppliers are free to speak with

Wilson's Human Resources Office located at the facility at any time with security that

they shall not be punished or prejudiced for doing so.

Additionally, Wilson will place a comment box at or near the Human Resources Office to enable employees and employees of contractors and suppliers to anonymously report to Wilson on noncompliance with Wilson's established workplace standard, with security

that they shall not be punished or prejudiced for doing so.

Deadline

12/31/2008

Date:

Action CAP was completed on or before Dec 31, 2008.

Taken:

Plan Yes

Complete:

Plan 12/31/2008

Complete

Date:

Action No

Verified:

Action PENDING: Monitor was not able to confirm the presence of a secure communications Verified channel to allow workers to report on issues related to the Code to the Company. The

Text: monitor did find a comment box



However, this does not meet the intent of a secure communication channel where workers can report to the Company (normally the corporate office) on noncompliance with the workplace standards, with security that they shall not be punished or prejudiced for doing so. Interviews with a sample of 8 workers did not confirm their knowledge of any reporting mechanism.

Action Verified 11/03/2010

Date:

Health and Safety: General Compliance Health and Safety

H&S.1 Employers shall comply with all local laws, regulations and procedures concerning health and safety. (S)

Noncompliance

Explanation: NEW FINDING:

1) Monitor's interview with management and subsequent inspection of the facility found that a US Department of Labor, Occupational Safety and Health Administration inspection was conducted on November 5, 2009 and December 2, 2009.

The company received three citations (posted in factory in view of workers) that covered various OSHA regulations including

- a) Availability of personal protective equipment to sewers,
- b) Lock out/tag out training and procedures
- c) Use of unrated/unapproved equipment attachment for fork truck
- d) Machine guarding
- e) Risk analysis for certain jobs where manual repetitive motion and force is needed to "turn" and "lace" product.
- e) OSHA incident and accident reporting (300 log) violations beginning in 2006 to 2009. Facility has not completed abatement on all citations at the time of the IEM specifically items #2 (training on lock out/tag out) and #5 (risk assessment and modification for lacing and turning tasks.



2) The monitor's inspection and testing of the facility's emergency lighting system found that two out of four emergency lights are not in working order. One light was located in the maintenance shop and the second near the south exit door of the factory.

Plan Of

With respect to citations - Litigate and settle. With respect to lighting, replace bulbs.

Action:

Deadline 12/08/2010

Date:

Action Litigated and Settled. Bulbs replaced.

Taken:

Plan No

Complete:

Plan 12/08/2010

Complete Date:

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)

Uncorroborated Evidence of Noncompliance

Explanation: Facility conducted a formal fire drill on August 1, 2007. According to employees and

management, there was a recent non-documented false alarm drill where employees

evacuated building as well. This event was not documented.

Plan Of Action:

It should be noted that all applicable legally required or recommended elements of safe

evacuation have been complied with. Workers are trained in evacuation procedures.

Alarm systems are regularly tested and evacuation drills are undertaken at least

annually.

As to the documentation of such evacuation drills, all area supervisors have been instructed to report all evacuation drills whether announced or unannounced to the Human Resources Office, which will keep a written record of all such events.



Deadline

12/31/2008

Date:

Action

This CAP was completed. No further action taken

Taken:

Plan Yes

Complete:

Plan 12/31/2008

Complete

Date:

Action Yes

Verified:

Action Verified

Text:

COMPLETED: Monitor found that the factory has conducted regular fire evacuation drills. The most recent fire evacuation drill was conducted on August 24, 2010. Notes on the evacuation drill performance were taken and items needing improvement were raised (including that supervisors and maintenance workers had taken a longer amount of time to evacuate due to shut down of critical equipment, location of alarms and sounding horns needs to be assessed and the uneven ground needed to be assessed for possible repair).

All items for improvement were noted and communicated to management for review. Worker interviews with a sample of 8 workers confirmed the fire evacuation drill event occurred in August.

Action
Verified
Date:

11/03/2010



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: NEW FINDING: Monitor found that Fire Extinguisher training for workers has not been

recently conducted (within past 12 months).

Annual training is required by OSHA 29CFR1910.157

Plan Of

Comply.

Action:

Deadline 06/30/2011

Date:

Action Scheduling in progress

Taken:

Plan No

Complete:

Plan 04/26/2011

Complete

Date:



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: NEW FINDING: Facility has not conducted Hazardous Communication training recently in

accordance with requirements of 29CFR1910.1200.

HR Manager informed monitor that training is scheduled for Spring 2011.

Plan Of Comply.

Action:

Deadline 06/30/2011

Date:

Action Scheduling in progress.

Taken:

Plan No

Complete:

Plan Complete Date:



Health and Safety: Other - Health and Safety

Other

Noncompliance

Explanation: Monitor found that the portable eyewash units at the battery charger station were

blocked.

Plan Of All obstacles to the portable eyewash units at the battery charger station were removed.

Action: The floor surrounding these units was painted red, so as to indicate that no materials

shall be placed in the area. While most employees understand this red indicator, a reminder, in the form of a newsletter, will be sent to all employees. This will prevent any

future blockage of this area

Deadline

12/31/2008

Date:

Action The CAP was completed. No further action taken

Taken:

Plan Yes

Complete:

Plan 12/31/2008

Complete

Date:

Action Yes

Verified:

Action COMPLETED: The factory maintains clear access to the battery charger eyewash station.

Verified The monitor inspected the facility for compliance to OSHA requirements. It was noted

Text: that the area leading to the eyewash station has been indicated by floor marking (paint)

to keep the area unobstructed.

Action

11/03/2010

Verified

Date: