2008

Fair Labor Association
Independent External Monitoring Report

COMPANY: Milliken
COUNTRY: United States
FACTORY CODE: 760082939G
MONITOR: ALGI
AUDIT DATE: September 23 – 24, 2008
PRODUCTS: Carpet, Tiles
PROCESSES: Manufacturing
NUMBER OF WORKERS: 367

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

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CONTENTS:

Forced Labor: Other - Forced Labor* _____ 3
Child Labor: Other - Child Labor _____ 3
Health and Safety: Evacuation Requirements and Procedure _____ 4
Health and Safety: Safety Equipment and First Aid Training _____ 6
Hours of Work: Rest Day_____ 7
Hours of Work: Other - Hours of Work_____ 8

*Denotes a Notable Feature

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Forced Labor: Other - Forced Labor

Other

Notable Feature

Explanation: Facility provides a flexible work schedule. Work schedule is structured to allow more than 2 days off during the week. As per interviews, this schedule allows them to spend more time with their families.

Child Labor: Other - Child Labor

Other

Noncompliance

Explanation: Although facility has adopted the FLA benchmarks which include the prohibition of child labor, there are no written procedures for age verification. Facility did not know or was not advised of the need to have a written procedure for age verification.

Plan Of Action: Facility does have documented procedures to address age verification. This item was not mentioned in the audit wrap up as being an actionable item. Applications & Employment SPI states that an applicant shall be at least eighteen (18) years of age except that applicants over sixteen (16) and under eighteen (18) years of age may be employed after securing a work permit (if applicable), with the approval of the authority designated by the Plant or Location Manager. Further, all associates have a Form I-9 on file (OMB no. 1615-0047), which details the documentation supporting associate age verification.

Deadline Date: 03/09/2009

Action Taken:

Plan Complete: No

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Plan Complete Date: 03/09/2009

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. Company policy is structured to have 4 drills per year. 2007 (One drill conducted - Severe weather drill), 2008 (None conducted up to date).

2. An exit by the shipping area does not have a “No Passageway” sign. This is a designated truck lift area and employees are not allowed to use this exit.

3. Evacuation plans located in the office are not 100% legible. The legends of these evacuation plans are not legible, as they are reduced copies of an originally larger plan. All other plans throughout the production floor are large enough to read all its contents.

1. Company policy was not followed up.

2 & 3. Safety committee failed to detect these observations.

Plan Of Action:	In follow up to the violation cited during our recent FLA audits regarding our failure to conduct 4 emergency preparedness drills annually, we have taken the following corrective actions: 1. The [Factory name] Complex Emergency Preparedness Safety Subcommittee has been assigned ownership and responsibility for conducting the 4 drills annually. 2. The Emergency Preparedness Safety Subcommittee has entered this action item on their safety tracking list to ensure annual completion of the 4 drills. 3. The Emergency Preparedness Safety Subcommittee has a drill evaluation document that they use to ensure a record is kept of all drills and action items generated from the drills are assigned ownership and completed. 4. As evidence of the process being implemented, a drill was successfully conducted on October 13, 2008.
Deadline Date:	03/09/2009
Action Taken:	
Plan Complete:	No
Plan Complete Date:	03/09/2009

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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: There aren't any procedures posted that deal with first aid and at least 2 first aid kits need replenishing with commercial grade materials as per 29CFR1910.266 App A . Safety committee failed to detect this observation. 29CFR1910.266 App A.

Plan Of Action: Flowcharts are posted which detail the correct actions for associates in need of first Aid. Further, this process is communicated with associate sign off during Orientation.

Deadline Date: 03/09/2009

Action Taken:

Plan Complete: No

Plan Complete Date: 03/09/2009

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Hours of Work: Rest Day

HOW.2 Workers shall be entitled to at least one day off in every seven-day period. If workers must work on a rest day, an alternative day off must be provided within that same seven-day period or immediately following the seven-day period. (P)

Noncompliance

Explanation:	Employees from the rug department on occasions volunteer to work on their rest days. This occurs during the months prior to Christmas demand orders.
Plan Of Action:	Company policy is to man to a median level of work demand, whereby our associates can expect to receive between 40 and 60 hours of work weekly. To meet demand during peak production seasons, we must ask associates to volunteer for overtime hours. The company deems this practice to be the fairest alternative for the associates, as opposed to manning for peak seasons and thereby requiring associates to rotate out and/or receive less than 40 hours during non-peak demand cycles.
Deadline Date:	03/09/2009
Supplier CAP:	Also, due to the current economic downturn, we foresee no events whereby associates will receive more than 60 hours per week in 2009.
Supplier CAP Date:	03/09/2009
Action Taken:	
Plan Complete:	No
Plan Complete Date:	03/09/2009

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Hours of Work: Other - Hours of Work

Other

Noncompliance

Explanation:	It is customary for employees from the various departments to voluntarily work overtime and exceed the permitted 60 hours per week (Regular and Overtime) during peak season (i.e., prior to Christmas season). As a sample from the week ending September 14, 2008, 87 employees worked over 60 hours per week in various departments.
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