FLA Audit Profile		Independent External Verification								
Country	El Salvador	El Salvador								
Factory name	46002203D	46002203DV								
IEM	GMIES	GMIES								
Date(s) in facility	October 26 - November 7, 2005	August 24 - 26, 2010								
PC(s)	MJ Soffe	MJ Soffe								
Number of workers	632	650								
Product(s)	Apparel	Apparel								
Production processes	Sewing/Packing	Sewing/Packing								

Product(s) Production processes	Apparel Sewing/Packing		Apparel Sewing/Packing															
		1		IEM Findings		ı			Remediation		[Status]	Upo	dates	[Status]	Third-Party Verification		Remediation	[Status]
FLA Code/Compliance Issue	Country Law/Legal Reference	FLA Benchmark	Noncompliance	Risk of Noncompliance	Evidence of If Not Noncompliance Corroborated, (Uncorroborated) Explain Why	Sources/Documentation Used for Corroborating	PC Remediation Plan	Target Completion Date	n Company Follow Up	Documentation	n Pending, Ongoing	Company Follow U	Documentation	Completed, Pending, Ongoing	External Verification (August 24-26, 2010)	Documentation	Company Remediation Plan	Target Completed, Completion Date Pending, Ongoing
Code Awareness     WorkerManagement Awareness of Code		FLA Principle of Monitoring, Obligation of Companies: Ensure that all Company factories are well as contractors and suppliers inform their employees about the workplace standards orally and through the possing of standards in prominent place (in the local languages spoken properties of the contraction of the properties of the properti	Factory has posted codes of conduct and its internal regulations in visible places, such as the plant's main entrance. However, during the interleview, none of the workers knew anything about the codes of conduct.		Constitution of the consti	Interviews with the workers and observation.		7/21/200	Espendors were trained Copy of code of conduct was given to employees. Code of conduct was explained over the microphone. The Initial training, completed July 21, is continuing with each new hire.	Management and worker interview.	Completed and	Completed and ongoing as new hires come in.	Training records, management and worker interview. Follow up 1/4/06	ongoing as new hires come in.	PENDING: Management said that workers are explained about the code during the recruitment process, but no documentary evidence of this was provided besides, 80% of Interviewed workers assured they are not aware of the company code.	Interviews with workers.	Factory management will have meetings every 6 morths, starting February 17, they will englain the code of contact to workers. Every employee has 17, they will englain the code of contact to workers. Every employee has 10 morths of the code of the	
Conflidential Nancompliance Reporting Channel		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 prefutice of for doing a	Albedy in management said that the factory has a support took through which writes are able to require glowance or suggestions to the HR Manager or other management representatives, according to the worker interview, this channel has been hardy over used. Most man the control of the support of the support production of the late of the support how to see a H-lowever, according to the interview with the control of the support of the support of the low to see a H-lowever, according to the interview with the low to see the support of the support of the low to fact the lower low to the support of the support of the low to fact the lower low to fact the lower low to the lower lower low to the lower low to low to the lower low to low to low low to low to low to low to low to low to low to low to l			Interviews with the management, the union representative and the workers.		In Plac	The suggestion fromes are checked on a weekly basis, appealson with their exposens filled filter her as a suggestion toxes in different areas; main entrance, women's restroom, marks restroom. The suggestion house will be opened weekly and management responses will be given within a week.	Inspection, checking with management on suggestions received and if answers were given.	Completed	January 4, 2007: Observation, while visitis	Inspection and ng. workers interview.	Completed	PRINCIPLE According to the management evidence are costly professed the System below and semillaccountry control to contact the bound However, 80% of interviewed sorters do not know have channels.	Interviews with workers.	Tacking vacagement all have needing every it much a starting florause. To a veglian it file node of credatal earlies for between file for earlies or contact the branch for mail or implement and the credit of the posters to winders. With a scendar a signed document by the engines, Employee name (is the person responsible for executing the trainings in the facility.	February 17, 2011
2. Forced Labor There will not be any use of force	d labor, whether in the form of prison labor, ind	entured labor, bonded labor or otherwise.																
<ol> <li>Child Labor</li> <li>No person will be employed at an the age for completing compulsor</li> </ol>	age younger than 15 (or 14 where the law of the y education in the country of manufacture when	e country of manufacture allows) or younger than e such age is higher than 15.																
		ject to any physical, sexual, psychological or verbal																
naracament of abuse. Verball Abuse		Employers will prohibit screaming, threatening, or demeaning verbal language.	One person who bisightened GMES said that during the monitoring processes. Boy are pressured by one of the support of the processes and the processes of the processes of the processes. The processes who were interviewed are specied of the factory, Moreover, after these mortiforing processes, the employees who were interviewed and several and settled of the employees are continuously insulaid froughout the appealant. Beackets, when the employees are continuously insulaid froughout the appealant. Beackets, when the category are represented to the other part of the processes, when the other processes, some employees had been admirately on the processes, some employees had been admirately on management because they reported contenting on the processes of the factory conditions.			Through a phone call and through interviews with the workers held truck the factory's facilities.						January 4, 2007: By observation			COMPLETED: There was no evidence of verbal abuse or resolution actions against workers.	Interviews with workers.		
<ol> <li>Nondiscrimination</li> <li>No person will be subject to any or or retirement, on the basis of ger</li> </ol>	discrimination in employment, including hiring, sader, race, religion, age, disability, sexual orient	alary, benefits, advancement, discipline, termination ation, nationality, political opinion, or social or ethnic																
origin.  Fregnancy Discrimination		Information arising from pregnancy testing undertaken voluntarily will not be used as a factor under taken voluntarily will not be used as a factor and the second of the		A programt women that GMRES interviewed stated that did a new worker finds, out in the first morth of being at a new worker finds, out in the first morth of being at management would fire her. Another workers and that when the found or down their programs or consistent on statement of the factor's management, they look for that could be a professor consequently for that reason, the would probably have to suspend her.	s	Interviews with pregnant women.	Talked with management again today for reasourance that progrant women were reasourance that progrant women were problems doing their legal pit. They problems doing their regular pit. They again reasourem that they would move them to another pib to help them.	Ongoing whe	in January 4, 2007: 84 days of malemaly leave and 70% of their saledes are given by social socially during their leaves are given by social socially during their leaves, section of their sales, storing with section of their sales, storing with extractions given by declore.	Discussions with Management	Completed	January 4, 2007	Discussions with management.	Completed	COMPLETED: No issues relating to pregnant women were found.	Interviews with pregnant women and observation tour.		
Pregnancy Accommodation		Reasonable accommodation will be made in the event of pregnancy, in a manner that will not unreasonably disadvantage the pregnant woman.	of the programs eromen that GMIES interviewed stated that although they have requested some changes related some sharpes. The state accommodations, (i.e., chairs that have some back support, change of operations or machinery) factory management has not attended to their requests.			Interviews with pregnant women.	Factory will train supervisors to work with employees if they encounter problems during pregnancy.	Now an ongoin	ed January 15, 2007. Factory management has assured us glittlet they shot program remome when they encounter problems during programacy by changing their jobs if requested.	Will set up interviews with pregnant women to see how they are doing.	Completed	Next visit down Februar 2007	y Will have interviews with pregnant women.	Completed	COMPLETED: No issues relating to pregnant women were found.	Interviews with pregnant women and observation tour.		
Other	The Law of Equal Opportunities for Disable Presons, on its article 24 the law meetions that "Every private employer has the obligation to hire, as a minimum, for each 25 workers under his service, if disabled personate under his service, if disabled personate properties of the position that is in demand."		Company has here only if disable poople and, according to the law based and the state shadowline for the state of the state shadowline (S.C.), factory the state of the state			Document review and interview with the management.	Work with factory to help them comptly with have concerning the hirting of dasabled persons. Will continue checking employment files to verify thiring process.	Present an continuin	of January 2, 2007. The factory understands are strong only year on the hirting datable persons. There is a unexample of the property of the	Review employment files	Completed	January 8, 2007	Employment files	Completed	COMPLITED: Fatory has row the legal required number of workers with deability.	Records review, worker and management interviews and observation tour.		
6. Health and Safety Employers will provide a safe and occurring in the course of work o	I healthy working environment to prevent accide r as a result of the operation of employer facilit	Ints and injury to health arising out of, linked with, or es.																
Fire Safety: Health and Safety Legal Compliance		Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits.		Although, the factory has the environmental permit required by the law (MARH - DAL - 297-2002) GMIES verified that the Environmental Adjustment Program has not been fully applied by the factory.		Interviews with the management and document review									COMPLETED: Environmental Program is being implemented.	Interview with management and observation tour.		
Document Maintenance/ Accessibility		All documents required to be available to workers and management by applicable laws (such as policies, MSDS, etc.) shall be made available in the prescribed manner and in the local language or language spoken by maprity of the workers if different from the local language.	There is no information posted at visible places regarding the misst of misstanding the chemical substances used at the cleaning department.			Observation									COMPLETED: There is posted information on the safe handing of chemicals in the relevant areas.	Observation tour.		
Evacuation Procedure		All applicable legally required or recommended elements of safe evacuation (such as posting of executation plans, sub-locked slades) careful c	in the production area it is difficult to follow the evacuation route because machines and materials, a) in some concessions, male access to the evacuation route difficult and, b) in other cases, block the exits.			Observation and worker interview			The workers at the factory had participated in several evacuation procedures and also have received courses on first aid proceedures and fire control.						COMPLETED: Evacuation routes were found unblocked.	Observation tour.		
PPE		Workers shall mean gosporphise protection expiremed facults a gloves, any protection, hashing protection, respiratory protection, etc.) to prevent rursale separure (such as inhalities prevent rursale separure (such as inhalities consistent of the such as a such as a such as protect rursale separure (such as inhalities consistent such as a such as a such as hashed doubt a such as a such as hashed doubt	Although the factory provides the adequate equipment to their employees, some of them do not use it.			Observation		1/4	On the pool remover habble them's, a way u.e. cryptoyees the this way out of more than the major than the size way out the more state from grammers, that way chemicals are disposed of through a vacuum system working them to the cubids.						PRINCIPLE 9, decements not. It was constructed first rose towns in the seeing downward production less duri due make bours in the seeing downward production less duri due make bours de limited production de la construction de la construction de adequisit ou en uccomfontable. Other understand and/or adequisit ou en uccomfontable. Other understand they due not the use of massits in serior gospatiment, where there is they glotted table in the use of massits in serior gospatiment, where there is they gotted table in the use of massits in serior gospatiment, where there is they gotted table in the use of massits in serior gospatiment, where there is they gotted table in the use of massits in serior gospatiment, where the is they gotted table in the use of massits in serior of consistent fill an usual serior of the serior of the serior of the serior of the serior of the serior of the serior of the referentiation at the serior of the serior of the referentiation at the serior of the serior of the serior of the serior of the serior of the serior of the serior of the serior of the serior of the serior of the serior of the serior of serior of serior of serior of serior of serior of serior of serior of serior of serior		Tackey presegment all conductions creating even it revolts to students than address the use of PPE student prices by Tackey 17, 2011. Outing these meetings an attendance document will be filled for future reterrors. Parkey this outin PPE sign and respect areas. [Employed rame] and Health and Safety Committee are responsible for endoring the ten the southern to improve and maintain the use of PPE.	February 17, 2011

				IEM Findings					Remediation		[Status] Updates	[Status]	Third-Party Verification		Remediation	[Status]
FLA Code/Compliance	Country Law/Legal Reference	FLA Benchmark	Noncompliance	Risk of Noncompliance	Evidence of If Not Noncompliance Corroborated,	Sources/Documentation Used for Corroborating	PC Remediation Plan	Target Completion	Company Follow Up	Documentation	Completed, Pending, Company Follow Up Documentation	Completed,	External Verification (August 24-26, 2010)	Documentation	Company Remediation Plan	Target Completed, Completion Date
Chemical Management		All chemicals and hazardous substances should be properly labeled and stored in accordance with	There is no information posted in visible places regarding risks of mishandling chemical substances used in the		(Uncorroborated) Explain Why	Observation		Date			Ongoing	Ongoing	COMPLETED: Factory has now posted information required and there was no evidence of problems with handling chemicals.	Observation tour and interviews with workers.		Ongoing
			risks of mishanding chemical substances used in the cleaning department. Substances used in cleaning department are not adequately disposed of because workers in this area sprinkle these substances on some of													
		use or chemicals and other hazardous substances.	workers in this area sprinkle these substances on some of the discarded clothes; later, these clothes are placed inside some of the cabinets in the factory.													
Ventilation/Electrical/facility maintenance		All ventilation, plumbing, electrical, and lighting services shall be provided and maintained to conform to applicable laws and prevent hazardous				Observation							NEW FINDING: In production area (sewing), temperature was 30° Celsius; workers complain because lamps which increase the heat,	Observation tour (temperature taken with the relevant instrument)	Factory repaired 3 fans that were not working when the inspection was conducted. Factory checked that all fans are in working condition in order to decrease the ambient temperature inside of the factory. Also, factory	February 10, 2011
		conditions to employees in the facility.											are so close to them. Fans are insufficient for the sewing department, considering that there is not an air flow system.	and workers interviews.	installed automatic oasis system, so that workers can drink cold water at anytime (Employee name) (maintenance) will be responsible for checking	
															that the fans are working properly. The placement of the lamps was under supervision of the labor department, to comply with the illumination requirements in the factory. A thermometer was installed in order to	
															moritor the temperature during working hours. MJ Soffe recommends to perform regular ambient temperature testing throughout the year. Engage local authorities to lead the testing and make the results available.	
															local authorities to lead the testing and make the results available.	
Sanitation in Facilities		All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clear	The toilets were unclean at the time the monitoring process was being conducted.			These findings were verified by observation.							PENDING: Toilets conditions in restrooms were not appropriate. Some toilets have broken levers to let water go away and some	Observation tour.	Factory has repaired broken levers, toilets and doors that do not close properly. Factory will implement a schedule, and signage sheet for	November 5, 2010
		and safe and be in compliance with applicable laws.											doors don't close properly. Despite the fact that there is a cleanliness personnel, tollets were dirty with urine and feces. Some tollets have also leaks.		maintenance in the bathrooms. Factory has improved the cleanliness of the restrooms. [Employee name] is responsible for keeping both the women's and men's bathrooms clean at all times according to the cleaning schedule.	
7 Francism of Association and	Collective Pargaining														1	
Employers will recognize and resp	ect the right of employees to freedom of asso	ociation and collective bargaining.														
Employer Interference in Registration		The employer will not interfere, to the detriment of worker's organizations, with government	Union affiliation is mandatory, because if employees do not sign the affiliation book at the moment that they sign their			Interviews with the workers and the union representative.							PENDING: Gathered information showed that the management continues promoting employee affiliation to one of the unions:	Interviews with workers and union leaders of both	Factory management to enhance its FOA policy by including the following elements: 1) ensure employees will not be subject to intimidation or	August 30, 2011
		worker's organizations, with government registration requirements regarding the formation of workers' organizations.	labor contracts, they are not hired by the company.										STITAS, which is the one with more affiliations in place. Manageme support STITAS and provide this union more opportunities than SIT	nt trade unions. Observation S. tour.	harassment in exercising their right to join or to refrain from joining any organization; 2) no interference and/or favoritism to any active union at the	
													During the 3 day audit, GMIES could verify that the leader of STITA has time to work on union activities in working hours at the factory, while no member of SITS has such advantage. Besides, some		workplace; 3) define the disciplinary process should any violation to this policy occur; and 4) define the communication protocols of enhanced FOA policy to parties involved. [Employee name], HR Manager, responsible for	
													workers interviewed confirmed that management allows STITAS board members to approach new employees in order to affiliate the to the trade union, while management tries to keep new employees	m	policy implementation and/or enforcement. Factory management to create FOA procedures that provide guidance on the following: a) relationship management; b) consultation/negotiation with active unions; o) dispute settlement; and d) communication of procedures to parties involved.	
													away from SITS members. This is a clearly interference in the union registration.	1	residential, b) consultativities of procedures to parties involved.  [Employee name], HR Manager, responsible to ensure their implementation. MJ Soffe recommends that factory management consider	
															implementation. MJ Soffe recommends that factory management consider a neutral 3rd party for ongoing policy and/or procedures training.	
Unfair Dismissal		otherwise coerce or threaten workers seeking to	Although there are already 2 unions at the factory, some of the workers interviewed stated that they think that the factory would not allow a different union at the plant. Some time ago			Interviews with the workers.							UNCORROBORATED NONCOMPLIANCE: Gathered information shows that factory has fired unionized workers in past, arguing retrenchment. Members of the SITS board that were interviewed	and union leaders of both	MJ Soffe recommends the factory to maintain a better record of employees. (Some workers were fired and they claimed being officials from the union committee, HR requested their IDs, but were not available.	June 30, 2011
		ionit, join of participate in workers organizations.	workers tried to form another union; management did not allow them and even fired some people.										confirmed this. In writing, factory does not have any record demonstrating that these workers were fired, their names are not	information gathered.	Weeks later they returned with their IDs and they were rehired).	
													included in the records of fired workers for the past 12 months.			
Employer Interference/Formation of Alternative Organizations		In cases where a single union represents	Although there are already 2 unions at the factory, some of the workers interviewed stated that they think that the factory			Interviews with the workers.							UNCORROBORATED NONCOMPLIANCE: Gathered information shows that management support STITAS and provide this union	Interviews with workers and union leaders and	Factory management to enhance its FOA policy by including the following elements: 1) ensure employees will not be subject to intimidation or	August 30, 2011
or Atlemative Organizations		in workers' ability to form other organizations that represent workers	would not allow a different union at the plant. Some time ago workers tried to form another union; management did not										more opportunities than SITS. For example, from the observation tour, it was corroborated that the leader of STITAS has time to	members and observation tour.	harassment in exercising their right to join or to refrain from joining any organization; 2) no interference and/or favoritism to any active union at the	
			allow them and even fired some people.										perform union activities in working time at the factory, while no member of SITS has such advantage. Besides, according to SITS leaders, management allows STITAS Board members to approach		workplace; 3) define the disciplinary process should any violation to this policy occur; and 4) define the communication protocols of enhanced FOA policy to parties involved. [Employee name]. HR Manager, responsible for	
													new orkers in order to affiliate them to the trade union, while management tries to keep new employees away from SITS Board members. For that reasons, management is hindering the affiliation		policy in patiest invived. [Employee halling, In R. Mahager, responsible to policy implementation and/or enforcement. Factory management to create FOA procedures that provide guidance on the following: a) relationship management; b) consultation/negotiation with active unions; c) dispute	
													members. For that reasons, management is hindering the affiliation activities of SITS.			
															[Employee name], HR Manager, responsible to ensure their implementation. MJ Soffe recommends that factory management consider a neutral 3rd party for ongoing policy and/or procedures training.	
Compliance to Local Collective		Employers will comply with all national and local laws and regulations concerning collective	According to the percentage established in labor code for			Interviews with the union's representative.							ONGOING: The biggest union at place has begun talks with	Interviews with management and union		
Bargaining Laws		bargaining and free association. Where conflicts are known to exist, employers will use the	collective bargaining, both unions have the right to negotiate a collective bargaining agreement (CBA) with management. However, the union representative interviewed stated that										management in order to negotiate a Collective Bargaining Agreement. The problem is that this union is so close to the management and it does not have independence.	management and union leader.		
		standard that provides the greatest protection for workers.	they would rather negotiate individual cases with Ministry of Labor. On this issue, it is necessary to point out that the reasons argued by both unions to abstain themselves in													
			initiating the negotiation of a collective bargaining agreement with management were contradictory. At the beginning they said that management was not willing to initiate the													
			said that management was not willing to initiate the negotiation, but later on they said that union had decided that it was not necessary.													
Other/No Interference Policy			It is important to mention that union affiliation is mandatory.			Interviews with the workers.				-		1	PENDING: As it was mentioned above, management promotes the	Interviews with workers	Factory management to enhance its FOA policy by including the following	August 30, 2011
			Some of the workers interviewed stated that they think that the factory would not allow a different union at the plant, because some time ago the workers tried to form another										affiliation of workers to the biggest union at place (STITAS), which constitutes an interference.	and union leaders and members.	elements: 1) ensure employees will not be subject to intimidation or harassment in exercising their right to join or to refrain from joining any organization; 2) no interference and/or favoritism to any active union at the	
			union; the management did not allow them and even fired some people. Also, factory does not hire workers who are affiliated to other unions. Besides, none of the workers												workplace; 3) define the disciplinary process should any violation to this policy occur; and 4) define the communication protocols of enhanced FOA policy to parties involved. [Employee name], HR Manager, responsible for	
			interviewed knew any of the unions' names, the activities													
			representatives are elected or if they held meetings with the workers. One worker said that both unions continuously pressure the employees to reach their goals.												FOA procedures that provide guidance on the following: a) relationship management; b) consultation/negotiation with active unions; c) dispute settlement; and d) communication of procedures to parties involved.	
			present the employees to reach their goals.												[Employee name], HR Manager, responsible to ensure their implementation. MJ Soffe recommends that factory management consider a neutral 3rd party for ongoing policy and/or procedures training.	
8. Wages and Renefits																
Employers recognize that wages a least the minimum wage required becofits.	are essential to meeting employees' basic nee by local law or the prevailing industry wage, wh	eds. Employers will pay employees, as a base, at hichever is higher, and will provide legally mandated														
Timely Payment of Benefits		All legally mandated deductions for taxes, social insurance or other purposes will be deposited	The factory has a different payroll which includes the persons that are hired as appreciates and deducts petitier			Payroll review 8	Employees have to sign a new agreement when they have completed their apprenticeship (after 30 days), then they	Now and	The training wage is paid for 30 days now with neither social security quota nor pension plan quota taken out during that	Document review	Completed February 2007 Employee file, and	Completed	COMPLETED: Factory does not have double payroll any more.	Records review.		
			persons that are hired as apprentices and deducts neither their social security quota nor their pension plan quota.					continuing	security quota nor pension plan quota taken out during that 30 days. Beyond the 30 days, normal deductions are taken out.		COCCURRENT POWERS.					
		includes any lawful garnishments for back taxes, etc. Employer will not hold any of these funds over from one pay period to the other, unless the law					ocial security and pension plan quota are aken out of their pay. Will check files to nake sure the policy is being followed.									
		specifies that deposits are to be made less frequently than pay periods (e.g., monthly				,	ebruary 2007									
		deposits, weekly pay). If the law does not specify, then deposits will be made before the next pay period in all cases.														
		parties of the same.														
Deduction for Services	According to the Salvadorian Labor Law deductions made to employees' gross salary will not exceed 20% of it.	Deductions for services to employees will not exceed the cost of the service to employer. If questioned, employers will demonstrate the	Several workers presented a higher withholding than what is permitted by the law.				Tia discussions with management, they willy take out the standard deductions	July 2006	Article 132 of the law allows the company to deduct 20% of their salaries. Article 136 (Flexible) from Labor Code allows the company to deduct 20% of their salaries if they have for	Employee pay files	Completed February 2007 Employee pay files	Completed	COMPLETED: Factory does not apply withholding in excess of the legal limits.	Records review.		
	mino exceed 20% of it.	questioned, employers will demonstrate the reasonableness of these charges.					niess there is an allowance for bank ayment. Will check employee pay files on ext visit February 2007		the company to deduct 20% of their salaries if they have, for example, a bank allowance.							
	<u> </u>	1	J					1		1		1		1	1	

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				IEM Findings	1				Remediation		[Status]	Updates	[Status]	Third-Party Verification		Remediation	[Status]
FLA Code/Compliance	Country Law/Legal Reference	FLA Benchmark	Noncompliance	Risk of Noncompliance	Evidence of If Not Noncompliance Corroborated,	Sources/Documentation Used for Corroborating	PC Remediation Plan	Target Completion	Company Follow Up	Documentation	Completed, Pending, Company F	ollow Up Documentation	Completed, Pending,	External Verification (August 24-26, 2010)	Documentation	Company Remediation Plan	Target Completed, Pending,
Payrol Reporting		Accurate and reliable payout reporting, including pay studies, will be previous.	The factory maintains double payrole.			Shaaton was verified through payroll review and worker tritterviews, when CAMES verified worker tritterviews, when CAMES verified worker tritterviews, when CAMES verified control and the control tritterviews to the control and the control tritterviews control and the control tritterviews programment from CAMES verified worker payrol, which do far de show any social Cancelorarily, was well her last of persons had as approximate. When CAMES verified workers proyel, we noted that employees do not recorde any bonuses or incontrols within the social programment of the control social proyel, we noted that employees do not record any bonuses or incontrols within the social proyel.		Date			Ongoing		Ongoing	COMPLETED. Packary does not have double payed any more.	Records review.		Ongoing Ongoing
Legal Benefits		Employers will provide all legally mandated benefits to all eligible workers.												NEW FINDING: Factory does not effectively guarantee the right of narrang mother to breastfeed her baby (Article 312 of the Code of narrang mother to breastfeed her baby (Article 312 of the Code of way be ensure she ould service the right to provide her the narrangs flow at the beginning or the end of the working day, instead of at the larnch break.	Observation tour, workers and management interviews	Factory will ask the nursing mother what would be the best time for her to name the child, either in the monthing, at moon or towards the end of her makes the child, either in the monthing are more to the child of	June 30, 2011
Payment of Legal Benefits		Legally mandated benefits will be provided or paid in full within legally defined time periods.				GMES combonated this sharlon Proughout the previous								NEW PEAGLE. There is a monomplation regularly \$16 shorted. While the Peagle of the Pea	Payroll and records review.	1) Company recommends that factory consides paying severance to the 4 A Company recommends that factory consides paying severance to the 4 A Contrates boxes calculation. Psychol system was fixed in November 2010 Contrates boxes can factor that Contrate and the severance of the	July 30, 2011
Accurate Recording of Wage Compensation		All hourly wages, piecework, bonuses, and other incentives will be calculated and recorded accurately.	Factory does not pay time established for lunch break because they work is hours a day, instead of 8, which is the standard established by Salvadoran Labor Code.			This situation was corroborated by GMIES through interviews with workers and management, and was also verified through payroit review.	Provide clear guidelines on pay for kinch to all employees and inform employees of these guidelines.	July 21, 2006	According to Labor Code Art. 166, when day work is not divided, employer must give employees breaks within day work so employees can have their food ime. These breaks able to a fleat and home. Feeling the provided chee publishers on pay for furch and has informed employees.	Document review, worker interview.	Completed Copy of guidelik	Document review	Completed	COMPLETED: Factory is paying employees for all the time performed.	Records review.		
Timely Payment		All compensation shall be paid in a timely manner.	Workers' salary is paid 5 days after payroll expiration date. GMIES considers this a very long period for workers, due to their low incomes.			GMIES corroborated this situation throughout the payrolls.	Employees are paid every other Friday, which allows time for payroll to be figured for the previous 2 weeks.		Factory has set pay schedules to be paid every 2 weeks.	Pay files review	Completed January 4, 200 pay files.	7 Check Pay files review	Completed	COMPLETED: Payments have been made in timely manner.	Records review.		
False Payroll Records		Employers will not use restore or milities payroll across in the controller. He controller is not controller to the controller in the cont	The factory maintains double payrols.			Southern well-def recognity payor for review and Southern Southern Souther								COMPLETED. At the present time, there is no evidence of double payme.			
Record Maintenance		All legally required peryol documents, journals and reports with a available complete, accurate and reports with a available complete, accurate and all recited W-4s.4, Jois, green cards, 941s and supporting material.)	On worker flee there is not an accurate date describing the day empty less similated that labor at flactory. Declarate both sympty less similated that labor at flactory. Declarate both January 2005, single with the job applications the flactory has. Also, workers' flee only contain a photocopy of local ID and the employees' picture.			GMIES corroborated this situation through reviewing the workers' files.								COMPLETED: Personnel files and contracts are in proper order.	Records review.		
	Labor Casa Aricle SP "seatablenee that contracts ingenting bloom that, due to its nature, is premanent in factory product be consoluted for an endine parcial, attacopy and an experiment of the consoluted for an endine parcial, attacopy as an experiment of the seatable parcial attacopy and an entire parcial pa	of service to determine the benefits to which workers are entitled.	Factors has a polyly establishing that their engitystes will graph a new lablor contract each year, consequently, their soverance payment will be pold innshigh, although workers contract working at labority. This severance payment is not contract working at labority. This severance payment is not amount that corresponds to workers.			GMES combined this shatten through reviewing the workers' files.	Discussed vacation and bonus pay with factory management.	Factory has been going by schedule and paying vacation and borrus each December	Clacked payor tills for employee sucation and bonus pay- vection pay with er Vegar x rate of pay per day x 19%. "Total Vacation Pays 15 days x rate of pay per day x 19%. "Total Vacation Pays 15 days x rate of pay per day x 19%. "Total Vacation Pays 15 days x rate of pay per day x 19% as a control of pays pays 10% years of payor total years of payor pays 10% years of devotrol — 16 days 10% years of dev	Employee pay files.	Completed January 4, 200	7 Checked employee boxs and vecation pay files.	Completed	PANDNS: Factor continues paying 170s of severance. Period reviewed grees from November 2009 to June 2010.	Payroll and records review.	For exercise payment, factor, management will pay in accordance with local lated trials. Facility of according to pay employees (50% when they have been freed [Employee mand, 14% Manager, responsible, MU Selfer been consecutation, but all any wasters for from the revenue 200° to June 2010, Society will by to brooth from sortiers to pay five remaining 201s.	Under investigation, estimated competion August 30, 2011
	Code of Labor Anticle 20, 6" latter b); claims that employees must provide workers exist? paid softing days per morth, at a maximum, for them to altend to familiar issues related a emergencies (such as death or illness of relatives).													NEW PROMISE, Factory does not proselle the 2 paid winding days permonth that both verrequise for windows to situate to sensitiat stosses (Close of Labor, Article 29; 6° Heart 8)). Factory only less caused for a Labor, Article 29; 6° Heart 8). Factory only less caused the lamit, Excharge discharge strong permonent (Adolanya Despate this, it was not possible to identify any specific permonent of the company of the company of the company of the practice.	management and workers	Sunagement will review the factory's policy. Procedures with or communication to works on shifting family policy mensioned in Afficia. 26 6 juint 51, in a word any confusion to workers. [Employee name] 19th Shaneger, responsible.	February 17, 2011
<ol> <li>Hours of Work</li> <li>Except in extraordinary business of week and 12 hours overtime or (b) where the laws of such country will be entitled to at least one day off in</li> </ol>	) the limits on regular and overtime hours allow Il not limit the hours of work, the regular work w	red to work more than the lesser of (a) 48 hours per wed by the law of the country of manufacture or, week in such country plus 12 hours overtime; and (ii)															
Forced Overtime		Under extraordinary business circumstances, employers will make extensive efforts to secure voluntary overtime work prior to mandating involuntary overtime.	2	workers interviewed said that they feel pressured to ork overtime.		GMIES corroborated this situation throughout interviews with the workers.								COMPLETED: No employee complaints of forced overtime.	Interviews with workers.		
Positive Incentives		Positive incentives will be utilized and known by the workers.		ome workers interviewed said that whenever they act their goals, they roceive bonuses that are bett of their goals, they roceive bonuses that are bett did than the orat houser. However, in these cases, e extra hours are not paid. This means that workers ecive either bonuses or overtime payment, but not the.		GMIES corroborated this situation throughout intenvious with the workers.			\$5.04 per day, \$0.03 per hour, \$1.26 Overtime, Deductions: Social Security = 3%, Provisions. Present and ongoing.	Checked payroll files for hours worked and pay, files were in order.	Payrolifiles Completed	January 4, 2007 checked files.	Completed	COMPLETED: Workers receive the relevant payments of overtime and bonuses.	Payroll and records review.		

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		·		IEM Findings	Remediation [Status]						is [Sta	us]	Third-Party Verification		Remediation		[Status]			
FLA Code/Compliance Issue	Country Law/Legal Reference	FLA Benchmark	Noncompliance	Risk of Noncompliance	Evidence of Noncompliance (Uncorroborated)	If Not Corroborated, Explain Why	Sources/Documentation Used for Corroborating	PC Remediation Plan	Target Completion Company Follow Date	Up Doo	cumentation	Completed, Pending, Ongoing	Company Follow Up	Documentation Comp Pend Ong	ng, ing	External Verification (August 24-26, 2010)	Documentation	Company Remediation Plan	Target Completion Da	Complete Pending, Ongoing
Overtime Limitations		Except in extraordinary business circumstances or employees will (in the required to work more than the issessed of (a) 48 hours per week and 12 to the control of the country of the country of manufacture or, where the laws of such country of manufacture or, where the laws of such country of manufacture or, where the laws of such country in coli mit the hours of work, the regular work, week in such country plass 11 hours overtime, and (i) to entitled to all such come duy of the such country plass 12 hours overtime, and circumstance is a temporary portion of settle work that could not have been articipated or alleviated by other reasonable efforts.					GMMIS combosted this situation throughout the payrolls.								PENDING: Found the	if 6 packaging department workers performed urs per week, in the period between May 17 -	Payroll and records review.	Factory management to defined returns or creame Fours of Virol, policy, and procedures that is collect regalar fours or the specific (employee) and opposition of the collect regalar fours of the specific (employee) and 12 hours courtime, or the times on regalar and coetime hours about 50 yet has used the courties of resultancies, 100 allows also considered or control of the courties of control of the courties o		
Reduced Mandated OT		reduce mandated overtime and to enact a	GMES (Fourd out that, Stautney's shift lusually in extended until 4.00pm, MacD, a workers irreviewed shade that they sare not allowed to leave factory until they reach their daily goal, which russally is around 6.30 in 2.700pm. One worker interviewed said that some employees start their shifts at 6.00am in order to finish their daily goal.				GMES corroborated this situation throughout interviews with the workers.								COMPLETED: Then Saturdays.	e is no evidence of forced working time on	Payroll and records review.			
	of manufacture or, in those countries where s	mpersated for overtime hours at such premium rate such laws will not exist, at a rate at least equal to																		
OT Compensation		premium rates for overtime compensation.	Some workers interviewed said that whenever they reach their goals and receive bonuses, the exits hours are not paid. This means that sorkers receive either bonuses or overtime payment, but not both.				GMIES corroborated this situation throughout interviews with the workers.	Discussed with management about the pay h policy.	January 4, 2007 Note: According to Lal Literal A: The employee can be hired by Literal C: Mixed System. By Time Ulsts time units, without any special consider. Daily Wage: \$5.04, normal hour wage:	Time Unit and emp Wage is adjusted to ation to job result.	view pay files for oloyees	Completed	Employee pay files.	Complet	d COMPLETED: World and bonuses.	cers receive the relevant payments of overtime	Payroll and records review.			

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