

2010

FAIR LABOR ASSOCIATION INDEPENDENT EXTERNAL MONITORING REPORT

COMPANY: New Balance

COUNTRY: India

FACTORY CODE: 97003211961

MONITOR: International Resources for Fairer Trade

AUDIT DATE: November 18, 2010 **PRODUCTS:** Field Hockey Sticks

PROCESSES: Saw Machine; Blade and Handling Fixing; Shaping; Reinforcement; Painting; Final

Finishing; Packing; Dispatching
NUMBER OF WORKERS: 16

Company Comment: From November 2010-March 2011, New Balance worked actively with this supplier to develop a remediation plan to address the findings raised by the IEM. However, due to other significant ongoing production problems, the sourcing team decided to permanently cease working with the factory at that same time. As a result, New Balance was unable to complete communication and implementation of the remediation plan.



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Wages, Benefits and Overtime Compensation: Holidays, Leave, Legal Benefits and Bonuses

WBOT.5 Employers shall provide all legally mandated holidays, leave, benefits and bonuses, such as official holidays, annual leave, sick leave, severance payments and 13th month payments, to all eligible workers within legally defined time periods. In addition, all leave and bonuses shall be calculated correctly. (S)

Explanation:	Factory does not provide any legally mandated paid leaves, Provident Fund, ESI, and bonuses to any of the workers.
	Sources: document review, worker and management interviews
Plan Of Action:	
Deadline Date:	
Supplier CAP:	We confirmed January 1, 2011: incorporated PF, ESI for all our employees. We shall also incorporate all other benefits as per the law for all our employees. We plan to email scanned copies of PF, ESI receipts.
Supplier CAP Date:	03/31/2011
Action Taken:	
Plan Complete:	No
Plan Complete Date:	



Wages, Benefits and Overtime Compensation: General Compliance Wages, Benefits and Overtime Compensation

WBOT.1 Employers shall comply with all local laws, regulations and procedures concerning the payment of wages and benefits, including overtime compensation. In any case where laws and the FLA Code are contradictory, the standard that provides the greatest protection for workers shall apply. Where provisions are lacking, employers shall take measures to reasonably accommodate matters concerning the payments of wages and benefits, including overtime compensation. (S)

Explanation:	Monitors observed inconsistency regarding the amount of wages paid. Worker testimony on wages revealed that the amounts workers receive are different than the amounts indicated on the salary payment and wage records. 1 worker on the manual attendance register is paid the overtime wage weekly on a piece rate basis. However, the OT payment is recorded on the subcontractors bill, instead of the wage records.
	Sources: record review, worker interviews
Plan Of Action:	
Deadline Date:	
Supplier CAP:	All employees are now paid salary/wages on a monthly basis, not on piece rate.
Supplier CAP Date:	03/31/2011
Action Taken:	
Plan Complete:	No
Plan Complete Date:	



Wages, Benefits and Overtime Compensation: Minimum Wage

WBOT.2 Employers shall pay workers at least the legal minimum wage or the prevailing industry wage, whichever is higher. (S)

No	nco	mp	lian	ce
		,P		

Explanation: The unskilled workers are paid less than the legal minimum wage. Factory pays INR

134.61, while the minimum wage for unskilled workers is INR 136.69.

Sources: record review, management interview

	Sources. record review, management interview
Plan Of Action:	
Deadline Date:	
Supplier CAP:	All employees are now paid salary/wages on a monthly basis, not on piece rate.
Supplier CAP Date:	03/31/2011

Action Taken:

Plan Complete: No

Plan Complete

Date:



Wages, Benefits and Overtime Compensation: Timely Payment of Wages

WBOT.4 All wages, including overtime compensation shall be paid within legally defined time limits. When no time limits are defined by law, compensation shall be paid at least once a month. (S)

Explanation	: Wages are paid on the 10th of each month as opposed to the 7th, as required by local law. Factory provides 4 workers free accommodation on the premises. On the day of the audit, 1 of them was found working in the morning (around 9am, before the factory starts operating at 10am), helping the saw man in production. It was not possible to predict if these extra hours were added to the OT hours, as this workers' in and out times are not recorded. Sources: worker and management interviews Legal Reference: Section 5 (1) of the Payment of Wages Act,1936
Plan Of Action:	
Deadline Date:	
Supplier CAP:	We confirmed that, starting April 1, 2011, salary/wages shall be paid before/on the 7th of each month. Any OT worked by any employee is duly recorded and paid with the salary/wages.
Supplier CAP Date:	03/31/2011
Action Taken:	
Plan Complete:	No
Plan Complete Date:	



Wages, Benefits and Overtime Compensation: Overtime Compensation Awareness

WBOT.11 Workers shall be informed, orally and in writing, about overtime compensation rates prior to undertaking overtime. (P)

	Noncompliance
Explanation:	Workers are not informed about OT compensation rates. Workers are not aware of the wages calculation or of the overtime payment. They reported that they understand having worked overtime only if they receive an additional payment to their basic wage at the end of the month.
	Sources: document review, worker interviews
Plan Of Action:	
Deadline Date:	
Supplier CAP:	We confirmed that each worker, if working overtime, shall be duly informed of overtime rates, with pay details on the pay slip, provided on pay day.
Supplier CAP Date:	03/31/2011
Action Taken:	
Plan Complete:	No
Plan Complete Date:	



Wages, Benefits and Overtime Compensation: Record Maintenance

WBOT.21 Employers shall ensure that all legally required payroll documents, journals and reports are available, complete, accurate and up-to-date. (P)

Noncompliance

Explanation: 1. Annual returns are not submitted to the inspectorate of factories as required by law.

2. Factory has subcontracted workers, but does not have registration certificate as required by law.

Source: record review

Legal References:

- 1) Section 110 of The Factories Act, 1948
- 2) Section 7 of The Contract Labour (Regulation and Abolition) Act, 1970

Plan Of
Action:
Deadline

Supplier

CAP:

Date:

Subcontracted production processes are for non-[Name of other company in factory] hand-stitched balls production. [Factory name] has subsequently joined the Sports Good Foundation of India (SGFI), as this organization helps monitor soccer ball production compliance. Annual company returns shall be submitted to the SGFI. We have also increased the number of employees to cut this subcontracting need.

Supplier CAP Date:	03/31/2011
Action	

Plan No

Plan Complete

Date:

Complete:

Taken:



Wages, Benefits and Overtime Compensation: Worker Wage Awareness

WBOT.22 Employers shall make every reasonable effort to ensure workers understand the wages, including the calculation of wages, incentives systems, benefits and bonuses they are entitled to in a factory and under applicable laws. To this end, employers shall communicate orally and in writing to all workers all relevant information in the local language or language(s) spoken by the workers, if different from the local language. (P)

Factory does not have any HR policies or training records to ensure that workers understand the calculation of their wages and mandatory benefits such as PF, ESI, and bonuses they are entitled to as required by law.
We confirm we that, in the factory area, we are now displaying explanations of the written minimum wage rates, wage calculations, incentive system, bonuses, etc., paid to workers.
03/31/2011
No



Wages, Benefits and Overtime Compensation: Posting Notices

WBOT.23 All notices that are legally required to be posted in the factory work areas shall be posted. All legally required documents, such as copies of legal code or law, shall be kept at the factory and available for inspection. (P)

	Noncompliance
Explanation	: Abstracts of The Factories Act, 1948; Minimum Wages Act, 1948; Minimum Wages; Wage Payment Day; Weekly Off; Holidays; and contact details of the government authorities such as the Labour and Factories Inspector are not posted in the factory.
	Source: factory walkthrough
Plan Of Action:	
Deadline Date:	
Supplier CAP:	We confirm that we are now putting these acts in printed format to display in the factory workshops.
Supplier CAP Date:	03/31/2011
Action Taken:	
Plan Complete:	No
Plan Complete Date:	



Wages, Benefits and Overtime Compensation: Pay Statement

WBOT.26 Employers shall provide workers a pay statement each pay period, which shall show earned wages, wage calculations, regular and overtime pay, bonuses, all deductions and final total wage. (P)

	Noncompliance
Explanation:	Workers are not provided pay slips.
	Sources: record review, worker interviews
Plan Of Action:	
Deadline Date:	
Supplier CAP:	We confirm starting April 1, 2011, all workers/employees shall be issued pay slips showing details of earned wages, OT pay, deductions, etc.
Supplier CAP Date:	03/31/2011
Action Taken:	
Plan Complete:	No
Plan Complete Date:	



Forced Labor: Freedom in Employment

F.2 All workers shall have the right to enter into and to terminate their employment freely. (P)

	Noncompliance
Explanation:	Factory does not provide employment contracts to workers.
	Sources: record review, worker and management interviews
Plan Of Action:	
Deadline Date:	
Supplier CAP:	We confirm that we are creating all employment contracts with workers, including freedom to terminate the employment clause.
Supplier CAP Date:	03/31/2011
Action Taken:	
Plan Complete:	No
Plan Complete Date:	



Freedom of Association: Grievance Procedure

FOA.26 Employer shall have in place written grievance procedures that allow first an attempt to settle grievances directly between the worker and the immediate supervisor but that, where this is inappropriate or has failed, it is possible for the worker to have the grievance considered at one or more steps, depending on the nature of the grievance and the structure and size of the enterprise. Employers shall ensure that the grievance procedures and applicable rules are known to workers. (P)

Explanation:	There are no mechanisms for addressing workers' concerns at the factory or any written policies or procedures. There are no committees representing workers or any suggestion boxes. Management reported that the grievance system is informal. Workers can approach the production manager or the owner directly.
Plan Of Action:	
Deadline Date:	
Supplier CAP:	We confirm putting up a suggestion box inside the factory for workers for any suggestion or grievance, as an alternative to writing in the grievance register with the production manager.
Supplier CAP Date:	03/31/2011
Action Taken:	
Plan Complete:	No
Plan Complete Date:	



Harassment or Abuse: General Compliance Harassment or Abuse

H&A.1 Employers shall comply with all local laws, regulations and procedures concerning discipline, violence, harassment and abuse. (S)

Noncompliance

Explanation: Factory does not have policy and procedure on harassment and abuse. Factory also does not have an Anti-Sexual Harassment Committee, although 4 women were seen on factory premises. The Supreme Court guidelines and The Sexual Harassment of Women at the Workplace (Prevention and Redressal) Bill, 2004 (later revised in 2006) have made it explicit that it is mandatory, on the part of an employer, to ensure an environment free from the threat of any kind of sexual harassment and exploitation. The Supreme Court has mandated every organization to have a committee to address incidents of sexual harassment in the workplace.

Plan Of Action:	
Deadline Date:	
Supplier CAP:	We are now formulating a policy to be posted in the factory area that clearly mentions that any person found or reported for sexual harassment shall be immediately terminated from their employment.
Supplier CAP Date:	03/31/2011
Action Taken:	
Plan Complete:	No
Plan Complete Date:	



Harassment or Abuse: Discipline/Written Disciplinary System

H&A.5 Employers shall maintain a system of written disciplinary rules, procedures and practices. Disciplinary rules, procedures and practices shall be clearly communicated to all workers. (P)

	Noncompliance
Explanation:	Factory does not have policy and procedure for handling discipline.
	Sources: record review, management interview
Plan Of Action:	
Deadline Date:	
Supplier CAP:	We are formulating a set of rules on discipline in the factory.
Supplier CAP Date:	03/31/2011
Action Taken:	
Plan Complete:	No
Plan Complete Date:	



Child Labor: Proof of Age Documentation

CL.3 Employers shall collect and maintain all documentation necessary to confirm and verify date of birth of all workers, such as birth certificates. In addition, the employers shall take reasonable measures to ensure such documentation is complete and accurate. (P)

Explanation	There are no age verification systems at the factory. The factory does not maintain any age verification documentation, such as workers' birth certificates or school-leaving certificates.
Plan Of Action:	
Deadline Date:	
Supplier CAP:	We are asking for copies of employees' birth certificates of all employees, or of any other age proof, to keep in our record files.
Supplier CAP Date:	03/31/2011
Action Taken:	
Plan Complete:	No
Plan Complete Date:	



Child Labor: Employment of Young Workers

CL.6 Employers shall comply with all relevant laws that apply to young workers (i.e., those between the minimum working age and the age of 18) including regulations relating to hiring, working conditions, types of work, hours of work, proof of age documentation, and overtime. (P)

Uncorroborated Evidence of Noncompliance:

Explanation	Monitors observed that there were 2 young looking workers in the factory. Further interaction with them revealed that they are between 16-17 years old; however, this could not be corroborated with records or evidence, as the factory does not maintain employment records for any of the workers. 1 of the young workers is staying in the dormitory; their name is not in the payroll, although they earn a salary of INR 3000. This worker is neither employed by the contractor nor has records available for review.
Plan Of Action:	
Deadline Date:	
Supplier CAP:	We are strictly against the use of child labor; we are also a member of SGFI, which is monitored by the ILO. We shall ensure no worker at our factory is underage.
Supplier CAP Date:	03/31/2011
Action Taken:	
Plan Complete:	No
Plan Complete Date:	



Non-Discrimination: General Compliance Non-Discrimination

D.1 Employers shall comply with all local laws, regulations and procedures concerning non-discrimination. (S)

	Noncompliance
Explanation:	Factory does not have a policy on non-discrimination. There is no procedure on how the factory makes its decisions for work assignments, job training, etc.
	Legal Reference: Section 5 of The Equal Remuneration Act, 1976
Plan Of Action:	
Deadline Date:	
Supplier CAP:	We are posting our written policy for non-discrimination and equal remuneration.
Supplier CAP Date:	03/31/2011
Action Taken:	
Plan Complete:	No
Plan Complete Date:	



Non-Discrimination: Sex-Based Wage Discrimination

D.4 There shall be no differences in remuneration for men and women workers for work of equal value. Remuneration (wages, compensation) includes the basic minimum or prevailing industry wage and any additional payments to be made directly or indirectly, whether in cash or in-kind, by the employer to the worker and arising out of the workers' employment. Such additional payments include wage differentials or increments based on seniority or marital status, cost of living allowances, housing or residential allowances, family allowances, benefits in-kind such as the allotment and cleaning of work clothes or safety equipment, and social security benefits. (S)

	Noncompliance
Explanation:	Factory does not have a policy on maternity leave.
	Sources: record review, management interview
Plan Of Action:	
Deadline Date:	
Supplier CAP:	We confirm posting the policy on non-discrimination and equal remuneration for men and women. We are posting a maternity leave benefits rule.
Supplier CAP Date:	03/31/2011
Action Taken:	
Plan Complete:	No
Plan Complete 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 has posted New Balance's Code of Conduct (COC) in English and Hindi languages in prominent places. However, workers said that they are not aware of the COC. There was no evidence of any kind of training on the COC. Source: observation, worker interviews Plan Of Action: **Deadline** Date: Supplier We shall inform our workers about the COC thoroughly. CAP: Supplier 03/31/2011 **CAP Date:** Action Taken: Plan No **Complete:** Plan Complete Date:



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:	Neither workers nor management are aware of the confidential noncompliance reporting mechanism which allows factory workers to contact the company directly. Factory has received the New Balance COC, but it does not involve any contact details.
	Sources: worker and management interviews
Plan Of Action:	
Deadline Date:	
Supplier CAP:	We confirm to inform workers of their right to put any grievances in writing in the suggestion/grievance box regarding any non-compliance with the workplace standards, etc.
Supplier CAP Date:	03/31/2011
Action Taken:	
Plan Complete:	No
Plan Complete 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)

Explanation	
Plan Of Action:	
Deadline Date:	
Supplier CAP:	We shall fully comply.
Supplier CAP Date:	03/31/2011
Action Taken:	
Plan Complete:	No
Plan 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)

Noncompliance

Explanation: 1. Factory does not have fire escapes on either side of the building as required by law.

- 2. Stairs are not equipped with handrails.
- 3. No fire extinguishers.
- 4. No rubber mats provided under the electrical panel boards. 5. No accident/injury records are maintained by the factory.
- 6. Aisles and exits are not marked.
- 7. No evacuation plan is posted.
- 8. No fire alarm in the factory.
- 9. No training is provided to workers on evacuation procedures and no evacuation drills are undertaken.

Source: visual observation

Plan Of Action:	
Deadline Date:	
Supplier CAP:	We have already ordered the railings for the staircase; put up fire extinguishers with additional extinguishers arriving; and have installed rubber mats, etc.
Supplier CAP Date:	03/31/2011



Action Taken:	
Plan Complete:	No
Plan Complete Date:	
H&S.10 All sa available in s	Safety: Safety Equipment and First Aid Training affety and medical equipment (such as fire fighting equipment, first aid kits, etc.) shall be ufficient numbers throughout the factory, maintained and stocked as prescribed and easily workers. A sufficient number of workers shall be trained in first aid and fire fighting S)
	Noncompliance
Explanation	: 1. First aid boxes did not have the prescribed medicines.
	2. No training is provided to workers on first aid, fire fighting techniques and safe machinery use, although almost all workers handle different working tools and equipment.
	Sources: record review, visual observation
Plan Of Action:	
Deadline Date:	
Supplier CAP:	We have put up a fully-equipped first aid box and are training 2 workers to effectively use it.
Supplier CAP Date:	03/31/2011
Action Taken:	



Plan Complete:	No
Plan Complete Date:	
H&S.11 Wor as gloves, ey (such as inha	Safety: Personal Protective Equipment kers shall be provided with effective and all necessary personal protective equipment (suc re protection, hearing protection, respiratory protection, etc.) to prevent unsafe exposure alation or contact with solvent vapors, noise, dust, etc.) to health and safety hazards, redical waste. (S)
	Noncompliance
Explanation	: None of the required personal protective equipment (PPE), such as gloves, masks, and earplugs are provided to workers.
Plan Of Action:	
Deadline Date:	
Supplier CAP:	We have started using gloves in the factory, and have ordered masks and earplugs, too.
Supplier CAP Date:	03/31/2011
Action Taken:	
Plan Complete:	No
Plan 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)

Explanation:	The chemicals used for pasting (e.g., hardner (rubber adhesive)) are not labelled in the local language.
Plan Of Action:	
Deadline Date:	
Supplier CAP:	Any hazardous chemical used has been labeled in the local language.
Supplier CAP Date:	03/31/2011
Action Taken:	
Plan Complete:	No
Plan Complete Date:	



Health and Safety: Material Safety Data Sheets/Worker Access and Awareness

H&S.14 Material Safety Data Sheets (MSDS) for all chemicals used in the factory must be available at the usage and storage sites of the chemicals, in the local language and the language(s) spoken by workers, if different from the local language. Workers shall have free access to MSDS. (P)

	Noncompliance
Explanation	: There are no material safety data sheets (MSDS) available for the chemicals being used.
	Sources: observation, worker interviews
Plan Of Action:	
Deadline Date:	
Supplier CAP:	We are posting the MSDS in usage and storage sites.
Supplier CAP Date:	03/31/2011
Action Taken:	
Plan Complete:	No
Plan Complete Date:	



Health and Safety: Ventilation/Electrical/Facility Installation and Maintenance

H&S.17 All necessary ventilation, plumbing, electrical, noise and lighting services shall be installed and maintained to conform to applicable laws and in such a manner as to prevent or minimize hazardous conditions to workers in the facility. (S)

	Noncompliance
Explanation	the noise level was very high in the saw section; the ventilation was also not sufficient, as lots of dust was generated. There were no eyewash stations in the painting/spraying section and in the area where chemicals are being used. The spray painting room had fumes during operation.
	Source: observation
Plan Of Action:	
Deadline Date:	
Supplier CAP:	We have already ordered the eyewash station for the painting room, and earplugs for the saw section.
Supplier CAP Date:	03/31/2011
Action Taken:	
Plan Complete:	No
Plan Complete Date:	



Health and Safety: Machinery Maintenance and Worker Training

H&S.18 All production machinery, equipment and tools shall be regularly maintained and properly guarded. Workers shall receive training in the proper use and safe operation of machinery, equipment and tools they use. Employers shall ensure safety instructions are either displayed/posted near all machinery or are readily accessible to the workers. (S)

Explanation:	There was no machine guarding for the saw machine.
	Source: observation
Plan Of Action:	
Deadline Date:	03/31/2011
Supplier CAP:	The saw machine now is fully guarded by an iron bar to prevent danger to operators.
Supplier CAP Date:	
Action Taken:	
Plan Complete:	No
Plan Complete Date:	



Health and Safety: Sanitation in Factory Facilities

H&S.22 All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with all applicable laws, including relevant sanitation, medical and safety and health regulations. (S)

	Noncompliance
Explanation	: The toilets were not hygienically maintained. There is no signage, such as those for exits, Men's/Women's toilet, and drinking water posted at the relevant areas.
	Source: observation
Plan Of Action:	
Deadline Date:	
Supplier CAP:	Signs have been posted; toilets have been renovated with clean tiles on the side walls and floor.
Supplier CAP Date:	03/31/2011
Action Taken:	
Plan Complete:	No
Plan Complete Date:	



Health and Safety: Drinking Water

H&S.26 Safe and clean drinking water shall be freely available at all times, within reasonable distance of the workplace. Drinking water shall be of a reasonable temperature and the means to drink water (cups, etc.) must be safe and sanitary and available in an appropriate number. (S)

	Noncompliance
Explanation	: The drinking water is not tested.
	Sources: record review, management interviews
Plan Of Action:	
Deadline Date:	
Supplier CAP:	The drinking water is from our own factory well that brings good, drinkable water from 250 feet underground. We are submitting samples for lab tests.
Supplier CAP Date:	03/31/2011
Action Taken:	
Plan Complete:	No
Plan Complete Date:	



Hours of Work: Time Recording System

HOW.6 Time worked by all workers, regardless of compensation system, shall be fully documented by time cards or other accurate and reliable recording systems such as electronic swipe cards. Employers are prohibited from maintaining multiple time-keeping systems and/or false records for any fraudulent reason, such as to falsely demonstrate working hours. Time records maintained shall be authentic and accurate. (P)

	Noncompliance
Explanation:	The factory maintains a manual attendance register. While in/out times are not recorded, the manual system marks "P" for Present and "A" for Absent. If there is overtime, only the total number of hours worked in a day is mentioned on the same manual attendance register. Factory does not maintain the start/end of overtime on the time records.
Plan Of Action:	
Deadline Date:	
Supplier CAP:	The electronic swipe card machine was ordered in February 2011. It is being delivered and installed by the company by the end of March 2011.
Supplier CAP Date:	03/31/2011
Action Taken:	
Plan Complete:	No
Plan Complete Date:	



Hours of Work: Overtime/Reduced Mandated Overtime

HOW.8 The employer shall demonstrate a commitment to reduce overtime and to enact a voluntary overtime system, including for overtime mandated to meet extraordinary business circumstances. (P)

	Noncompliance
Explanation:	3 workers worked more than 140 OT hours in 1 quarter. According to law, OT hours should not exceed 50 hours in 1 quarter. All 3 workers (2 hockey-stick makers, 1 saw man) worked for 50 hours in April and May 2010. In June 2010, they worked 46, 42, and 48 hours, respectively.
	Source: record review
	Legal Reference: Law Reference - Section 64 (4) (iv) of The Factories Act, 1948
Plan Of Action:	
Deadline Date:	
Supplier CAP:	We confirm that OT hours worked shall be duly regulated and recorded with electronic swipe cards.
Supplier CAP Date:	03/31/2011
Action Taken:	
Plan Complete:	No
Plan Complete Date:	



Hours of Work: Annual Leave

HOW.14 Employers shall provide workers with paid annual leave as required under local laws, regulations and procedures. (S)

Explanation:	No earned leave is provided to workers.
	Source: record review
Plan Of Action:	
Deadline Date:	
Supplier CAP:	We confirm that leave will be provided starting from January 1, 2011, when we also incorporate PF, ESI, and other benefits.
Supplier CAP Date:	03/31/2011
Action Taken:	
Plan Complete:	No
Plan Complete Date:	