

FLA Audit Profile			FLA IEV Audit Profile						
Factory Name	030032629F		030032629FV						
Country	India		India						
Independent External Monitoring Organization	Fair Wear Foundation		Level Works Ltd.						
Date(s) in Facility	November 1 - 2, 2007		October 23 - 24, 2009						
FLA Affiliated Compañ(ies)	GFSI, Inc.		GFSI, Inc.						
Number of Workers	311		780						
Product(s)	Garments								
Production Processes	Cutting to Packing								
FLA Code/Benchmark	Compliance Status	[Status]	Description of Noncompliance, Risk of Noncompliance or Un corroborated Evidence of Noncompliance	Updates (Cite Date of Follow Up)		Third-Party Verification		Company Verification Follow Up	
		Completed, Pending, Ongoing		Company Follow Up	Documentation	External Verification (October 24, 2009)	Documentation	Company Follow Up (January 10, 2010)	Documentation
GEN 1: Establish and articulate clear, written workplace standards. Formally convey those standards to Company factories as well as to licensees, contractors and suppliers.	Risk of noncompliance	Pending	Could not check with contractors, suppliers, etc., but the understanding is that workplace standards have not been shared with them.			The workplace standards still have not been shared with the contractors, suppliers, etc., including the group factories where embroidery and collar work is done. Pending	record review; worker and management interviews; physical observation of notices and postings	GFSI does not allow unauthorized subcontracting. Workplace standards, that meet or exceed GFSI's Code of Conduct (COC), should be shared with all facilities in [Factory name] and factories where embroidery and collar work is done. These factories must sign our Factory Obligation Letter and return by the deadline date 3/1/2010.	Workplace standards have been briefed to our workers in all our training sections and detailed written regulations are handed over to them along with their appointment order as per policy mentioned in our WRAP manual policy #2.2. We cannot display our work standards in areas of subcontractors and group factories as per local practice.
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.	Risk of noncompliance	Pending	Could not check with contractors, suppliers, etc., but the understanding is that workplace standards have not been shared with them.			The workplace standards still have not been shared with the contractors, suppliers, etc., including the group factories where embroidery and collar work is done. Pending	record review; worker and management interviews; physical observation of notices and postings	GFSI does not allow unauthorized subcontracting. Workplace standards, that meet or exceed GFSI's Code of Conduct (COC), should be shared with all facilities in [Factory name] and factories where embroidery and collar work is done. Advise plan for how to communicate these expectations to other locations and suppliers. Deadline Date: 3/1/2010	Workplace standards have been briefed to our workers in all our training sections and detailed written regulations are handed over to them along with their appointment order, as per policy mentioned in our WRAP manual policy #2.2. We cannot display our work standards in areas of subcontractors and group factories as per local norms.
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	Pending	Local contact details are not available along with the displayed codes.			Local contact details were still not posted. Pending	physical observation of postings	Post GFSI's COC, which includes local contact details for workers to contact GFSI directly. GFSI's COC should be posted in an area where workers are able to review it. Deadline Date: 3/1/2010	Local contact details and emergency numbers are displayed at the entrance of the company and in the work place. GFSI posters with local contacts are displayed on the production floor and at the entrance for workers' reference.
F.9 Employment Records	Risk of noncompliance	Pending	Records for temporary workers are not available. However, both management and worker interviews clearly showed no forced labor.			No records of temporary workers were available. But, both management and worker interviews clearly showed no forced labor. Pending	documentation review; worker and management interviews	Records of temporary workers must be kept on file. Factory should have a written procedure on handling temporary worker documents in place and available for review. Deadline Date: 4/1/2010	Per our policy, we do not entertain temporary workers in our company. Refer to our manual policy #2.2.
CL.3 Proof of Age Documentation	Risk of noncompliance	Pending	No such documentation for temporary workers.			No documents available for temporary workers employed in the past year, although factory admits having employed them. Presently, no temporary workers were appointed. Pending	documentation review, management interview	Records of temporary workers must be kept on file. Factory should have a written procedure on handling temporary worker documents in place and available for review. Deadline Date: 4/1/2010	Per our policy, we do not entertain temporary workers in our company. Refer to our manual policy #2.2.
CL.4 Other Means of Age Verification	Risk of noncompliance	Pending	No such documentation for temporary workers.			There was no evidence that any other means of age verification was used by the factory for temporary workers. Pending	documentation review, management interview	Records of temporary workers must be kept on file. Factory should have a written procedure for handling temporary worker documents in place and available for review. Deadline Date: 4/1/2010	The age proof document is a compulsory document for employee personnel file. During interviews, age verification and age calculation sheet are mandatory for young looking workers. Evidence is attached in workers' files.
D.2 Employment Decisions	Risk of noncompliance	Pending	Regarding temporary workers, management maintains that those who work regularly for a year without being absent for a few weeks now and then are turned permanent, while workers claim that in spite of continued service in the factory for more than a year, they are still termed temporary, and thus given lower wages, and no benefits.			No record was available to verify whether temporary workers were made permanent in the past. As there were no temporary workers employed at the time of audit, it could not be verified. Pending	documentation review	Records of temporary workers must be kept on file. Factory should have a written procedure for handling temporary worker documents in place and available for review. Deadline Date: 4/1/2010	We do not engage any temporary workers in our unit, permanent workers are employed with their complete records and work history maintained.
D.3 Recruitment and Employment Practices (Job Advertisements, Job Descriptions and Evaluation Policies)	Risk of noncompliance	Pending	Temporary vs. permanent nature of work not clear to workers.			This matter is still not clear to workers. As all worker accounts are settled on a yearly basis, there is actually not much clarity. Pending	documentation review, worker interview	The factory should develop a clear distinction between the nature of temporary and permanent work. This should be written and workers should be notified. Deadline Date: 3/1/2010	We do not engage any temporary workers in our unit, permanent workers are employed with their complete records and work history maintained.
D.14 Discriminatory Violence/Harassment/Abuse	Noncompliance	Pending	Temporary workers are discriminated with wages below the minimum wage and no benefits.			This could not be verified, as there were no temporary workers at the time of audit and the factory was unable to produce temporary worker wage records for past months. Pending	documentation review, management interview	Records of temporary workers must be kept on file. Factory should have a written procedure for handling temporary workers in place and available for review. Deadline Date: 4/1/2010	We have written procedure in place as per our policy #7, a contract of workers is formed to identify this and bring it to management's knowledge. Display boards educate workers to approach appropriate persons when they come across or undergo discrimination.
H&S.20 Bodily Strain	Noncompliance	Pending	Workers do not have stools with backrests. No stools for standing workers like checkers and ironers.			Stools were still without backrests. No seating arrangements were made for workers who normally work in a standing position. Pending	physical observation	To determine ways to lessen bodily strain on workers, the factory should contract a company for an ergonomic assessment. Deadline Date: 5/1/2010	Seating arrangements are made per workers' demands. Requirement of workers' convenience is made and discussed in each meetings held each month. Progress is analyzed and recorded. Stools are provided for workers who work in standing position. But, workers insist we are ready to invest in back rest stools.
FOA.19 Right to Collective Bargaining/Good Faith	Risk of noncompliance	Completed	A workers' association exists, but it is not a forum for collective bargaining agreement (CBA), as there are no management representatives in it to enable mutual discussion.			Management representation was included in the Works & Grievance Committee that met periodically. The present strength being 3 workers' representative and 1 management representative. Completed	documentation review, management interview		
FOA.22 Right to Collective Bargaining/Compliance with Collective Bargaining Agreement (CBA)	Noncompliance	Pending	The TEA ([District name] Export Association) CBA rate is not honored in the factory. There is no forum for workers to raise this issue, nor are workers aware of the TEA rates. In fact, even the management feels that it is enough to abide by the legal minimum wage. Still, temporary workers fall below this minimum wage also.			Management still feels it was enough to abide by the minimum wages prescribed by the State and not honor the TEA ([District name] Export Association) CBA rate, although factory management admitted they were members of TEA. Pending	documentation review, management interview	Factory should honor the TEA ([District name] Export Association) CBA wage for all workers. Wages should meet or exceed the TEA wage for normal and overtime hours. The factory must clarify how wages are calculated and demonstrate to all workers that they are being paid at a rate meeting or exceeding the TEA rate. Deadline Date: 5/1/2010	Per our policies #5 and #9 workers all have freedom to form associations and collectively bargain their needs. Wages are fixed and meet the Government Minimum Wage Act released each year. Wage slips are given during wage disbursement that clearly state the details of their wages.

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HOW.1 General Compliance Hours of Work	Noncompliance	Pending	While management mentioned work hours to not be excessive, evidence has shown otherwise.			There was still evidence of the factory having work hours in excess of the recorded working hours. The factory was unable to produce further records for verification of working hours. Pending	documentation review; worker and management interviews	GFSI prefers to work with suppliers who are transparent about their business practices, even if the practice is out of compliance with local law. Factory must maintain accurate records to account for all total hours worked. Factory needs to develop a plan to ensure that all working hours are being accounted for properly. Management must review their record-keeping practices and ensure that all records are accurate and available for review. Records must correspond with all other documents. Deadline Date: 5/1/2010	Per our policy #6, workers are engaged for 8 hours a day, and work OT as per duration stipulated by the inspector of factories. Biometric system is in place for all workers and working hours for workers are recorded on time cards which reveal their working hours.
HOW.5 Protected Workers (Women and Young Workers)/Record Keeping	Noncompliance	Pending	No such records for temporary workers.			No records of temporary workers were produced by the factory for verification. Pending	documentation review	Records of temporary workers must be kept on file. Factory should have a written procedure for handling temporary work documents in place and available for review. Deadline Date: 4/1/2010	Per our policy #3, we do not engage child labor in our company. Young workers below the age of 18 are not allowed to work per our policy. Their age is identified by age-proof documents and if required, they undergo a dentist's check up to identify their age. Deadline: September 5, 2010
HOW.6 Time Recording System	Noncompliance	Pending	Legally permitted 48 hours OT per quarter alone is documented and made available for audit. All work time should be properly recorded as per the compliance norms.			Complete working hours were still not being documented and produced for verification, as the production records showed that the factory worked September 6 and October 11, whereas time and attendance records showed the factory was closed for rest day. Pending	documentation review; worker and management interviews	GFSI prefers to work with suppliers who are transparent about business practices, even if the practice is out of compliance with local law. Factory must maintain accurate records to account for all total hours worked. Factory needs to develop a plan to ensure that all working hours are being accounted for properly. Management must review their record-keeping practices and ensure that all records are accurate and available for review. Records must correspond with all other documents (production records). Deadline Date: 5/1/2010	A biometric system is in place to calculate workers' working hours. Exact time records are maintained their wages are based on these records and distributed each week. Workers can cross check their hours of work and wages with the wage slip provided to them, which ensures prompt payment of wages for working hours.
HOW.9 Overtime/Positive Incentives	Uncorroborated noncompliance	Pending	Due to lack of all pertinent records, it is not clear whether all OT is paid at premium rate.			Complete overtime hours and their compensation could not be verified for adequate compensation, as pertinent records were still not produced. Pending	documentation review; worker and management interviews	Records of temporary workers must be kept on file. Factory should have a written procedure for handling worker documents in place and available for review. Deadline Date: 4/1/2010	OT wages are disbursed with weekly wages and leave wages are given once a year along with bonus. Workers are well aware of this procedure and calculations are transparent on the time card with them.
HOW.11 Extraordinary Business Circumstance/Forced Overtime	Noncompliance	Pending	No system to document that OT is voluntary.			There was still no system to document that overtime work was voluntary. Pending	documentation review; management interview; physical observation of postings	Factory should ensure that all work, including overtime, is voluntary. Factory should ensure a policy is in place that indicates to workers that overtime is voluntary. Workers and management should be notified of this policy and it should be posted where workers can review. Deadline Date: 3/1/2010	Per our policy #2, we do not force any laborer to work unwillingly at any point in time. They have formed a committee that can bring this to management's notice if they come across any such occurrences.
WBOT.1 General Compliance Wages, Benefits and Overtime Compensation	Noncompliance	Pending	Temporary workers are discriminated with wages below the minimum wage and no benefits. Double payment for all OT is not documented.			No records were produced for the temporary workers employed during the past year to verify non-discrimination on wages or payment of minimum wage. Double payment for all overtime was still not documented. Pending	documentation review; management interview	Records of temporary workers must be kept on file. Factory should have a written procedure for handling temporary worker documents in place and available for review to ensure that there is no discrimination of wages or payment for temporary workers. Payment of overtime must be documented for temporary workers. Deadline Date: 4/1/2010	Per our policy #7, we do not discriminate workers on the basis of wage, age, experience, etc. Workers are well educated on this by monthly meetings and training sections.
WBOT.2 Minimum Wage	Noncompliance	Pending	Temporary workers are discriminated with wages below the minimum wage.			No records were produced for the temporary workers employed during the past year to verify non-discrimination of wages. Pending	documentation review	Records of temporary workers must be kept on file. Factory should have a written procedure for handling worker documents in place and available for review to ensure no discrimination of wages for temporary workers. Deadline Date: 4/1/2010	Per our policies #5 and #7, we do not discriminate against workers on basis of wage, age, experience, etc. Workers are well educated on this by monthly meetings and training sections.
WBOT.3 Training and Probation Wage	Noncompliance	Pending	Temporary young workers are discriminated with wages below the minimum wage and no benefits.			No young workers were identified during the audit. But, no records were produced for temporary workers employed during the past year to verify non-discrimination of wages. Pending	documentation review; worker interview	Records of temporary workers must be kept on file. Factory should have a written procedure for handling temporary worker documents in place and available for review to ensure no discrimination of wages for temporary workers. Deadline Date: 4/1/2010	Monthly training sections are held for workers on updates of labor laws and minimum wages. Committees formed among them have updated knowledge of the wages and allowances they get.
WBOT.5 Holidays, Leave, Legal Benefits and Bonuses	Noncompliance	Pending	ESI (Employee State Insurance), PF (Provident Fund) benefits are not given to temporary workers.			ESI (Employee State Insurance) and PF (Provident Fund) benefits are still not extended to temporary workers. No documentation was maintained to this effect. Pending	documentation review	Records of temporary workers must be kept on file. Factory should have a written procedure for handling temporary worker documents in place and available for review. ESI and PF should be extended to temporary workers and well documented. Temporary workers should be notified upon hire that these benefits are extended to them. This notice should also be posted where workers can review it. Deadline Date: 4/1/2010	Per our policy #5, workers are provided with all eligible compensation and benefits. Bonus, leave wages, medical benefits, etc., are provided to our workers as per law. Wage benefits as per law are displayed for workers' easy reference.
WBOT.7 Payment for All Hours Worked	Noncompliance	Pending	No record of work time and payment for temporary workers.			No records were produced for temporary workers employed during the past year to verify whether all working hours were paid. Pending	documentation review	Records of temporary workers must be kept on file. Factory should have a written procedure for handling temporary worker documents in place and available for review. Factory must maintain accurate records in order to verify that all workers, including temporary workers, are paid all hours worked. Deadline Date: 4/1/2010	We do not engage any temporary workers in our unit, permanent workers are employed with complete records and work history is maintained.
WBOT.8 Calculation Basis for Overtime Payments	Noncompliance	Pending	Records incomplete.			The calculation basis for overtime work could not be ascertained due to incomplete time and wage records produced. The production records showed that the factory worked September 6 and October 11, whereas time and attendance records showed factory to be closed for rest day. Pending	documentation review	GFSI prefers to work with suppliers who are transparent about business practices, even if the practice is out of compliance with local law. Factory must maintain accurate records to account for all total hours worked. Factory needs to develop a plan to ensure that all working hours are being accounted for properly and that workers are provided with 1 day off in every 7 days. Management must review their record-keeping practices and ensure that all records are accurate and available for review. Records must correspond with all other documents (production records). Within 5 months, factory must demonstrate that all employees are being paid the correct wages and benefits for all work performed. Deadline Date: 7/1/2010	OT work hours are maintained as per government rules and regulations. OT hours are paid double the wages to workers and they are educated on this via monthly meetings and trainings.

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WBOT.10 Premium/Overtime Compensation	Noncompliance	Pending	No records.			Overtime compensation records were not verifiable due to the absence of complete and correct records. Pending	documentation review	GFSI prefers to work with suppliers who are transparent about business practices, even if the practice is out of compliance with local law. Factory must maintain accurate records to account for all total hours worked. Factory needs to develop a plan to ensure that all working hours are being accounted for properly. Management must review their record-keeping practices and ensure that all records are accurate and available for review. Records must correspond with all other documents (production records). Deadline Date: 5/1/2010	OT records are maintained for employees.
WBOT.17 Accurate Calculation and Recording of Wage Compensation	Noncompliance	Pending	No records for temporary workers, and no accurate records of OT for permanent workers also.			No records for temporary workers and no accurate records of OT for permanent workers were maintained. The production records showed that the factory worked September 6 and October 11, whereas time and attendance records showed the factory to be closed for rest day. Pending	documentation review	GFSI prefers to work with suppliers whom are transparent about business practices, even if the practice is out of compliance with local law. Factory must maintain accurate records to account for all total hours worked. Factory needs to develop a plan to ensure that all working hours are being accounted for properly and that workers are provided with 1 day off in every 7 days. Management must review their record-keeping practices and ensure that all records are accurate and available for review. Records must correspond with all other documents (production records). Within 5 months, factory must demonstrate that all employees are being paid correct wages and benefits for all work performed. Deadline Date: 7/1/2010	A biometric system is in place to calculate workers' working hours. Exact time records are maintained, their wages are based on and distributed through these records each week. Workers can cross check their hours of work and wages with the wage slip provided to them, which ensures prompt payment of wages for working hours.
WBOT.19 False Payroll Records	Noncompliance	Pending	All payroll records were not available for audit.			Correct and complete payroll was not available for audit. The production records showed that the factory worked September 6 and October 11, whereas time, attendance and wage records showed the factory to be closed for rest day. Pending	documentation review, management interview	GFSI prefers to work with suppliers whom are transparent about business practices, even if the practice is out of compliance with local law. Factory must maintain accurate records to account for all total hours worked. Factory needs to develop a plan to ensure that all working hours are being accounted for properly and that workers are provided with 1 day off in every 7 days. Management must review their record-keeping practices and ensure that all records are accurate and available for review. Records must correspond with all other documents (production records). Within 5 months, factory must demonstrate that all employees are being paid correct wages and benefits for all work performed. Deadline Date: 7/1/2010	A biometric system is in place to calculate workers' working hours. Exact time records are maintained, their wages are based on and distributed through these records each week. Workers can cross check their hours of work and wages with the wage slip provided to them, which ensures prompt payment of wages for working hours.
WBOT.20 Payroll Record Maintenance/Worker Acknowledgement	Noncompliance	Pending	No records of payment to temporary workers.			No records of payment to temporary workers. Pending	documentation review, management interview	Records of temporary workers must be kept on file. Factory should have a written procedure in place available for review for handling temporary worker documents. Deadline Date: 4/1/2010	Payroll registers, such as 12 and 25, are acknowledged by workers. Time cards and wages slips are also acknowledged by them.
WBOT.21 Record Maintenance	Noncompliance	Pending	Incomplete - not available for audit.			Correct and complete payroll was not available for audit. The production records showed that the factory worked September 6 and October 11 whereas time, attendance and wage records showed the factory to be closed for rest day. Pending	documentation review, management interview	GFSI prefers to work with suppliers whom are transparent about business practices, even if the practice is out of compliance with local law. Factory must maintain accurate records to account for all total hours worked. Factory needs to develop a plan to ensure that all working hours are being accounted for properly and that workers are provided with 1 day off in every 7 days. Management must review their record-keeping practices and ensure that all records are accurate and available for review. Records must correspond with all other documents (production records). Within 5 months, factory must demonstrate that all employees are being paid correct wages and benefits for all work performed. Deadline Date: 7/1/2010	We have detailed record of each worker working in our company, their working hours are accounted by the biometric system, which generates wages based on their attendance. Time cards are generated to confirm their working hours. Accurate data is available for workers to check their data.
WBOT.27 Wage Receipt	Noncompliance	Pending	Not for temporary workers.			No wage records and wage receipt was produced for temporary workers. Pending	documentation review	Records of temporary workers must be kept on file. Factory should have a written procedure for handling temporary worker documents in place and available for review. Deadline Date: 4/1/2010	A wage slip is given to each worker during wage disbursement, which has all the details of working hours and wage details.