



2008

FAIR LABOR ASSOCIATION INDEPENDENT EXTERNAL MONITORING REPORT

COMPANY: Jostens
COUNTRY: United States
FACTORY CODE: 220082927G
MONITOR: Accordia Global Compliance
Group
AUDIT DATE: September 24 – 25, 2008
PRODUCTS: Scholastic Award Products
PROCESSES: Automatic Cutting, Sewing,
Leather Cutting, Embroidery, Final
Inspection, Warehouse, Shipping
NUMBER OF WORKERS: 125



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*Denotes a Notable Feature



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)

Notable Feature

Explanation: Monitor reviewed the published documents related to worker benefits provided by the company. Typically, in the apparel industry, only mandatory benefits related to social security taxes, workers' compensation and unemployment insurance are offered by companies. At this facility, workers are offered an expanded list of voluntarily paid benefits that include profit sharing (amount set aside from company profits and apportioned to workers), sickness and accident pay for workers who are out of work due to an illness or injury (to provide partial wage continuation to workers for support of their families), and 401k Retirement Plan where workers may set aside a portion of their wages, before taxation, into an independently managed account and the company provides a matching contribution of 20% for all savings above 4% of the worker's contribution.



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: There is no reporting mechanism which allows factory workers to contact the Company to report noncompliances related to the workplace standards.

Plan Of Action: Employees have been notified of the confidential hotline (1-877-***-****) which can be used as an anonymous tool to report any issues. Additionally, the plant has implemented an Open Door Policy, a progressive mechanism for employees to communicate to Supervisors and plant management. Communication and training on the policy occurred the week of December 8, 2008. To supplement training and other notification, the hotline number is posted in the plant. The plant manager retains responsibility for assuring the implementation and enforcement of the policy within the respective plant. Policies and procedures will be communicated through a) periodic employee training with respect to policies and procedures and b) posting of the hotline for employee reporting under the Code at various locations throughout the plant.

Deadline Date: 12/15/2008

Supplier CAP:

Supplier CAP Date: 12/12/2008

Action Taken: PowerPoint presentation developed by HR and presented by the plant management to all employees.

Plan Complete: No

Plan Complete Date: 12/12/2008



Health and Safety: Notification and Record Maintenance

H&S.7 Employers shall notify the relevant authorities of all illnesses and accidents as required by applicable laws. All illness, safety and accident reports shall be maintained on site for at least one year, or longer if required by law. (P)

Notable Feature

Explanation: Facility has reported on the Form 300A that over the 12 month period of 2008, there were only 2 reportable accidents/injuries in the factory. This low level of injuries is likely due to the substantial level of training that is provided to workers in the areas of Hazardous Communications, Proper Lifting, Ergonomics, First Aid, Use of Personal Protective Equipment, and other aspects of H&S. One injury was for a minor abdominal strain and the other for a minor cut that required sutures. In comparison to like facilities of its size, this is a notable record.

Health and Safety: Evacuation Requirements and Procedure

H&S.9 All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, the installation and maintenance of an employee alarm and emergency lighting systems, ensuring aisles/exits are not blocked and that workers are not blocked within their workstations, employee education, evacuation procedures, etc.) shall be complied with. Workers shall be trained in evacuation procedures. Alarm systems shall be regularly tested and evacuation drills shall be undertaken at least annually. (S)

Uncorroborated Evidence of Noncompliance

Explanation: Facility management does not have a written emergency plan that includes fire evacuation (only tornado procedures), explaining to workers in a step-by-step fashion how to proceed in the event of a fire.

Plan Of Action: Develop a written emergency plan to present to all employees. Copy of Fire Safety and Evacuation plan on file at Jostens.

Deadline Date: 12/01/2008

Supplier CAP:



Supplier CAP 12/01/2008

Date:

Action Taken: Written Fire Safety and Evacuation plan presented to all employees.

Plan Complete: No

Plan Complete Date: 10/31/2008

Health and Safety: Safety Equipment and First Aid Training

H&S.10 All safety and medical equipment (such as fire fighting equipment, first aid kits, etc.) shall be available in sufficient numbers throughout the factory, maintained and stocked as prescribed and easily accessible to workers. A sufficient number of workers shall be trained in first aid and fire fighting techniques. (S)

Noncompliance

Explanation: Facility does not conduct hands-on training in the use of fire extinguishers. Nevertheless, management explained that written instructions are affixed to each extinguisher, detailing safe operation of the unit.

Plan Of Action: Plant to work with local fire protection agency and train personnel in the use of fire extinguishers.

Deadline Date: 12/01/2008

Supplier CAP:

Supplier CAP Date: 12/01/2008



Action Taken: Six employees trained by local fire protection services in the use of Portable Fire Extinguishers. Training is documented and Certificate of Completion has been issued to the plant. Copy of Certificate of completion on file at Jostens.

Plan Complete: No

Plan Complete Date: 10/15/2008

Health and Safety: Personal Protective Equipment

H&S.11 Workers shall be provided with effective and all necessary personal protective equipment (such as gloves, eye protection, hearing protection, respiratory protection, etc.) to prevent unsafe exposure (such as inhalation or contact with solvent vapors, noise, dust, etc.) to health and safety hazards, including medical waste. (S)

Noncompliance

Explanation: 1. Employees were observed applying logos on jackets using pins, creating a blood pathogen issue since all employees in that area use the same pins.

2. During the facility safety inspection monitors found four employees operating overlock sewing machines, which include eye guards meant to protect employees, with the guard positioned up (unprotected). This is not a machine guard issue, but rather a personal protective equipment issue, due to the lack of importance placed on the use of such protective equipment.

Plan Of Action: 1. The plant is reviewing several options to resolve any potential issues including: a) gloves, b) using tape or glue instead of pins and c) utilizing plastic tabs to affix the logos to the product. In January 2009 the plant will test different methods that would use glue, tape or tagging gun to temporarily hold the patch until it is sewn on, thereby eliminating the use of pins completely.

2. Plant will review safety issues in relation to using the eye guards and will place notices in the sewing areas reminding employees that the use of any type of guard is mandatory while operating the machines.



Deadline 12/19/2008
Date:

Supplier
CAP:

Supplier CAP 12/19/2008
Date:

Action 1. Still in process and testing. Ongoing.
Taken: 2. Signs have been posted in sewing area which read: "Notice all guards must be in the correct position when machines are operating."

Plan No
Complete:

Plan 12/19/2008
Complete
Date:
