



2010

## FAIR LABOR ASSOCIATION INDEPENDENT EXTERNAL MONITORING REPORT

**COMPANY:** New Wave Group  
**COUNTRY:** China  
**FACTORY CODE:** 7700151191I  
**MONITOR:** Openview Service Limited  
**AUDIT DATE:** November 17-18, 2010  
**PRODUCTS:** Garments  
**PROCESSES:** Cutting, Embroidering,  
Sewing, Trimming, Ironing, Inspection,  
Packing  
**NUMBER OF WORKERS:** 217

**Company Comment:** During the period of roughly 2007-2012, Cutter & Buck was associated with the FLA through our parent company, New Wave Group AB, which was the Participating Company at that time. Since February 2012, Cutter & Buck has become the directly affiliated Participating Company, with the rest of the New Wave Group ceasing affiliation with the FLA. IEM and SCOPE audits were conducted with several suppliers associated with New Wave Group AB during that period. But many of these suppliers were never used by Cutter & Buck, and never produced garments for the US collegiate market. Because we had no interactions with these suppliers, we have no input or comment on any pending audit reports. The audits should be considered closed and ready for publication once the FLA has concluded their findings.



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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)

#### **Noncompliance**

**Explanation:** 1) According to the social insurance payment receipt for October 2010 provided by factory management and interviews with workers and management, it was noted that the factory only provided pension and work-related injury insurance for 104 out of 217 employees; medical and unemployment insurance for 106 employees, and maternity insurance for 37 employees.

2) Based on the information gathered from document reviews and worker and management interviews, it was confirmed that 90 “temporary workers” were not paid for public holidays.

Legal Reference: Article 73 of China Labor Law

#### **Plan Of Action:**

Finding 1):

- a. Factory shall identify all workers who were not paid social insurance as per law and pay those workers in arrears.
- b. Factory shall establish a wage policy such that all 5 types of social insurance are paid to all workers no later than January 2012.
- c. Factory shall assign a person responsible for reviewing and updating the wage policies as well as following up the implementation of these policies.

Finding 2):

a. Factory shall identify workers who were not paid proper holiday wages and make payment in arrears as per China labor law. Factory shall establish a wage policy such that all workers are paid proper holiday wages.

b. Factory will not hire temporary workers after moving to the new site in early May 2011.

c. Factory shall establish the wage policy to ensure that all workers are paid legally for overtime worked.

d. Factory shall train all workers on wage policy.

e. Factory shall assign responsible person for reviewing and updating the leave policies as well as following up the implementation of these policies.

**Deadline** 01/31/2012  
**Date:**

**Action**  
**Taken:**

**Plan** No  
**Complete:**

**Plan**  
**Complete**  
**Date:**

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### **Wages, Benefits and Overtime Compensation: False Payroll Records**

WBOT.19 Employers shall not use hidden or multiple payroll records in order to hide overtime, to falsely demonstrate hourly wages, or for any other fraudulent reason. Payroll records maintained shall be authentic and accurate. (P)

#### **Noncompliance**

**Explanation:** Payroll records from October 2009 to September 2010 the factory provided were inconsistent and inaccurate due to the following:

- 1) 20% of interviewed workers reported that they were paid based on piece rate with no extra overtime premium. 80% of interviewed workers reported that they were paid based on hourly rate, among which 60% reported that they were also not paid an overtime premium. But the provided payroll records showed that all workers were paid based on an hourly rate and paid overtime premium as per law.
- 2) Based on the review of a worker's handwritten work time records found in production area during factory tour, it was noted that the worker worked in September 2010, but the factory could not provide his payroll records of that month.
- 3) The factory could not provide 30 out of 217 employees' payroll records. Factory management explained that the 30 workers were not their employees, and they were hired by their foreman. But management could not provide any documents to support the explanation.
- 4) The related time and payroll records provided by management were incomplete or inaccurate.

**Plan Of  
Action:**

Finding 1, 2, 3, 4):

- a. Factory shall keep an actual register of working hours for all regular & OT hours for all the workers.
- b. Factory shall provide payroll records to all workers.
- c. Factory shall appoint a responsible person to be in charge of relative issues and establish an internal monitoring policy to ensure compliance with the regulation.
- d. Factory shall provide training to employees on payroll records.
- e. Factory shall maintain at least 12 months of payroll and time records for audit verification.

**Deadline  
Date:**

07/31/2011

**Action  
Taken:**

**Plan  
Complete:**

No

**Plan  
Complete  
Date:**

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### **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)

#### **Noncompliance**

**Explanation:** Although the factory had established policies regarding paid leaves (annual, marriage, maternity, sick and funeral leaves) as per law, no evidence indicated that workers received those paid leaves except annual leave. 90% of interviewed workers were not aware of those policies.

Legal Reference: Article 8 of China Labor Contract Law

**Plan Of Action:**

- a. Factory shall train all workers on leave policy.
- b. Factory shall post leave policy on notice board.
- c. Factory shall implement policies as stated.
- d. Factory shall assign responsible managerial staff for following up the implementation of the leave policies and procedures.

**Deadline** 10/31/2011

**Date:**

**Action Taken:**

**Plan Complete:** No

**Plan Complete Date:**

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**Forced Labor: Employment Terms/Voluntary Agreement**

F.3 Employment terms shall be those to which the worker has voluntarily agreed, in as far as those terms do not fall below provisions of local laws, freely negotiated and valid collective bargaining agreements, or the FLA Code. (P)

**Noncompliance**

**Explanation:** Documents review noted that a worker started working for the factory on October 13, 2010, but the term of his employment contract started on November 13, 2010.

Legal Reference: Article 10 of the China Labor Contract Law

- Plan Of Action:**
- a. Factory shall develop a policy of reviewing contract content with each employee prior to employee's signature.
  - b. Factory shall update all employee contracts with the correct enrollment date verified by employee signature.
  - c. Factory shall appoint a person responsible during the hiring process for monitoring and facilitating contract verification with employees.

**Deadline Date:** 10/31/2011

**Action Taken:**

**Plan Complete:** No

**Plan Complete Date:**

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### Forced Labor: Employment Records

F.9 Employers shall maintain sufficient hiring and employment records to demonstrate and verify compliance with this Code provision. (P)

#### Noncompliance

**Explanation:** The factory management was unable to provide auditors with 30 out of total 217 workers' employment contracts for review.

Legal Reference: Article 10 of the China Labor Contract Law

**Plan Of Action:**

- a. Factory shall sign labor contracts with all workers.
- b. Factory shall appoint a person to be responsible for related issues and establish an internal monitoring policy to ensure compliance with the regulation, including keeping all contracts for minimum of 2 years.
- c. Factory shall train all of workers about China Labor Contract Law.

**Deadline Date:** 10/31/2011

**Action Taken:**

**Plan Complete:** No

**Plan Complete Date:**

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## **Freedom of Association: Right to Freely Associate**

FOA.2 Workers, without distinction whatsoever, shall have the right to establish and, subject only to the rules of the organization concerned, to join organizations of their own choosing without previous authorization. The right to freedom of association begins at the time that a worker seeks employment, and continues through the course of employment, including eventual termination of employment, and is applicable as well to unemployed and retired workers. (S)

### **Noncompliance**

**Explanation:** FLA Comment: The Chinese constitution guarantees Freedom of Association (FOA); however, the Trade Union Act prevents the establishment of trade unions independent of the sole official trade union - the All China Federation of Trade Unions (ACFTU). According to the ILO, many provisions of the Trade Union Act are contrary to the fundamental principles of FOA, including the non-recognition of the right to strike. As a consequence, all factories in China fall short of the ILO standards on the right to organize and bargain collectively. However, the government has introduced new regulations that could improve the functioning of the labor relations mechanisms. The Amended Trade Union Act of October 2001 stipulates that union committees have to be democratically elected at members' assemblies and trade unions must be accountable to their members. The trade union has the responsibility to consult with management on key issues of importance to their members and to sign collective agreements. Trade unions also have an enhanced role in dispute resolution. In December 2003, the Collective Contracts Decree introduced the obligation for representative trade unions and employers to negotiate collective agreements, in contrast to the previous system of non-negotiated administrative agreements.

Notes: There was no trade union in the factory. Through management and worker interviews, it was noted that there was no worker committee, but 4 work representatives in the factory. Management also reported that those worker representatives were not actually performing their function during recent years.



**Plan Of Action:** Factory will establish trade union per Amended Trade Union Act of October 2010 to improve freedom of association for all workers. The policy will be posted on the bulletin board for workers' awareness. In addition, Factory shall communicate Code of Conduct to ensure that workers are aware of their associational rights. Factory managers and workers shall participate in trainings on how to respect FOA in practice. Factory shall establish policies and procedures on FOA that respect the right in practice including adoption of a policy of non-retaliation against workers who choose to exercise their freedom to associate and establishment of a grievance procedure to provide a channel for workers who do feel aggrieved. Factory shall establish policy to prevent discrimination against workers who want to exercise their freedom to associate rights throughout its labor management control system.

**Deadline Date:** 06/30/2011

**Action Taken:**

**Plan Complete:** No

**Plan Complete Date:**

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### Harassment or Abuse: Discipline/Review of Disciplinary Action

H&A.3 The disciplinary system shall include possibilities for workers to have disciplinary action imposed on them reviewed by someone at a higher managerial position than the manager who imposed the disciplinary action. In addition, such a system shall include the ability of a worker to appeal and/or question any disciplinary action against him or her and/or have a third party of his or her choice present when the disciplinary action is being imposed. (P)

#### Noncompliance

**Explanation:** Based on documents review and management and workers interview, it was noted that the disciplinary system did not include the ability of a worker to appeal and/or question any disciplinary action against him or her and/or have a third party of his or her choice present when the disciplinary action was being imposed.

**Plan Of Action:** a. Factory shall set up the disciplinary policy such that workers may have a pathway of appeal of any disciplinary action imposed upon them. The disciplinary policy and appeals process must provide for impartial and non-retaliatory measures and procedures. Procedures shall include but not be limited to duration of appeals period, process of appeal, forms of acceptable evidence such as letters of defense, witness testimonies, other external and internal evidence, and rules governing formation of committee including membership containing elected worker representatives. The disciplinary committee shall have decision-making authority regarding disciplinary actions and appeals.

**Deadline Date:** 12/31/2011

**Action Taken:**

**Plan Complete:** No

**Plan Complete Date:**

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### 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)

#### Noncompliance

**Explanation:** The factory management was unable to provide auditors with 30 out of 217 employees' personnel files and ID documents for review. Management explained that the 30 workers were not their employees, and they were hired by their foreman. But no legal documents could be provided to support the explanation.

Legal Reference: Article 4 of the Provisions on Prohibition of Child Labour

**Plan Of  
Action:**

- a. Factory shall detail personnel files with copies of I.D. for the temporary workers.
- b. Factory shall register temporary workers' enrollment date in the personnel files where applicable.
- c. Factory shall develop and assign a person responsible for monitoring policy of keeping records for a minimum of 2 years, as per law.

**Deadline  
Date:** 10/31/2011

**Action  
Taken:**

**Plan  
Complete:** No

**Plan  
Complete  
Date:**

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## **Non-Discrimination: Recruitment and Employment Practices (Job Advertisements, Job Descriptions, Evaluation Policies)**

D.3 Recruitment and employment policies and practices, including job advertisements, job descriptions, and performance/job evaluation policies and practices shall be free from any type of discriminatory bias. (S)

### **Noncompliance**

**Explanation:** Based on review of recruitment advertisements posted at the factory gate, it was noted that the factory would only hire female candidates for the positions of cleaner, and only male candidates under the age of 50 would be hired for the position of production assistant.

Legal Reference: Article 12 of China Labor Law and Article 20 of Provisions on Employment Services and Employment Management

**Plan Of Action:**

- a. Factory shall abolish discriminatory hiring policy immediately.
- b. Factory shall establish hiring policy that is free of discrimination and ensure all the new employees are above 16 years of age.
- c. Factory shall post the updated hiring policy and chart on site for workers' awareness.
- d. Factory shall require management training on discriminatory practices.

**Deadline Date:** 07/31/2011

**Action Taken:**

Plan            No  
Complete:

Plan  
Complete  
Date:

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### 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) Visual inspection found that there were no exit signs or emergency lights above 1 out of 2 exits in the workshop on the 5th floor; and no exit sign or emergency light above the exit of accessory warehouse on the 3rd floor.

2) Based on the review of documents and management interviews, it was noted that the factory only conducted fire drills once per year, which violated the local law: fire drills should be conducted at least twice per year.

3) Factory tour noticed that aisles of some workstations in the sewing workshop on the 3rd floor were blocked by products.

Legal references: (1) Article 11.3.4 and 11.3.1 of the Code for Design of Building Fire Protection and Prevention (GB50016-2006); (2) Article 16 of the China Fire Prevention Law and Article 40 of the Fire Prevention Regulation for Government offices, Organizations and Enterprises; (3) Article 28 of the China Fire Prevention Law

**Plan Of  
Action:**

Finding 1):

- a. Factory shall equip each emergency exit with emergency light and exit signs for emergency evacuation purposes.
- b. Factory shall establish monthly inspection and maintenance procedures for all the fire equipment to ensure that it is in functioning condition and the inspection records should be well documented.
- c. Factory shall appoint a responsible person to be in charge of regular inspection.

Finding 2):

- a. Factory shall establish the fire safety policy, making sure the fire drill would be conducted at least twice per year.
- b. Factory shall carry out the first half year of fire drill by the end of June 2011 after moving to the new site.
- c. The fire drill minutes shall be well documented for future guidelines.

Finding 3):

- a. Factory shall ensure all the work aisles are free from any obstruction.
- b. Factory shall develop the training program on fire equipment and evacuation safety.
- c. Factory shall appoint a person to be in charge of fire safety inspection in working hours.

**Deadline  
Date:** 03/01/2011

**Action  
Taken:**



**Plan** No  
**Complete:**

**Plan**  
**Complete**  
**Date:**

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### **Health and Safety: Safety Equipment and First Aid Training**

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

#### **Noncompliance**

**Explanation:** Visual inspection found that 4 fire extinguishers in warehouse on the 5th floor were simply put on the floor, not mounted on hangers, brackets or in cabinets.

**Legal Reference:** Article 5.1.3 of the Code for Design of Extinguisher Distribution in Buildings

- Plan Of Action:**
- a. Factory shall ensure that all fire extinguishers would be installed at accessible height, and not over 1.5 m or less than 0.15m.
  - b. Factory shall ensure that all areas would be with suitable number of fire extinguishers / equipment.
  - c. Factory shall ensure that all fire extinguishers / equipment would be inspected at least once a month, and shall keep inspection record.
  - d. Factory would ensure that all fire extinguishers remain easily accessible & unblocked.
  - e. Factory shall assign responsible managerial person to monitor inspection records to ensure periodic compliance.



**Deadline**    10/31/2011  
**Date:**

**Action**  
**Taken:**

**Plan**        No  
**Complete:**

**Plan**  
**Complete**  
**Date:**

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### 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)

#### Noncompliance

**Explanation:** Factory tour noticed that many drink water bottles were used as ethyl alcohol containers without identification labels in inspection area on the 3rd floor.

Legal Reference: Article 12 of the Regulations on Safety in Workplaces Where Chemicals Are Used

- Plan Of Action:**
- a. Factory shall prepare chemical lists and maintain the relevant MSDS.
  - b. Factory shall post MSDS where chemicals are used and stored.
  - c. Factory shall label the chemicals where it used and stored.
  - d. Factory shall establish the Chemical Management Procedure including regular trainings on the procedure, chemical safety and chemical handling/usage.
  - e. Verification methods shall be adopted including, but not limited to, internal audit.

**Deadline Date:** 10/31/2011

**Action Taken:**

**Plan Complete:** No

**Plan  
Complete  
Date:**

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### **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)

#### **Noncompliance**

**Explanation:** 1) Visual inspection found that none of the sewing machines in the factory were equipped with needle guards; there were no eye protective Plexiglas shields for about 50% high-speed sewing machines; and there were no safety guards for all riveting machines in the factory.

2) Factory walkthrough observed that the safety warning for 10% sewing machines were in Japanese and English, and 90% sewing machines had no safety warning.

Legal Reference: Article 6.1.6 of Code of Design of Manufacturing Equipment Safety and Hygiene and Article 28 of the Law of the People's Republic of China on Work Safety

**Plan Of  
Action:**

Finding 1):

- a. Factory shall check all sewing machines for needle guards.
- b. Factory shall equip all the sewing machines with needle guards.
- c. Factory shall establish machine maintenance procedures accordingly.
- d. Factory shall provide training for the workers on machine safety.

Finding 2):

- a. Factory shall conduct routine inspection to identify all dangerous machines.
- b. Factory shall post safety warning for all the dangerous machines in local language.

**Deadline**    03/01/2011  
**Date:**

**Action**  
**Taken:**

**Plan**        No  
**Complete:**

**Plan**  
**Complete**  
**Date:**

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### **Hours of Work: General Compliance Hours of Work**

HOW.1 Employers shall comply with all local laws, regulations and procedures concerning hours of work, public holidays and leave. (S)

#### **Noncompliance**

**Explanation:** 1) Based on the review of time records from October 2009 to November 17, 2010, and the information gathered from worker and management interviews, it was noted that about 40% of workers' overtime exceeded 36 hours in February 2010, and 80% of workers' overtime exceeded 36 hours per month in the other months. The max was up to 142.5 hours in June 2010.

2) Based on the review of the provided time records from October 2009 to November 2010, and the information gathered from worker and management interviews, it was noted that around 60% of workers worked more than 60 hours per week in June and July 2010, the maximum was up to 74 hours.

Legal Reference: Article 41 of the China Labor Law



**Plan Of  
Action:**

Findings 1, 2):

- a. Factory shall identify root cause of excessive overtime through independent study or consultation.
- b. Factory shall report findings and together with Company develop controls based on root cause analysis/consultation to reduce excessive overtime hours.
- c. Factory shall incorporate process and procedures to control excessive overtime in peak periods.
- d. Factory shall develop system of advising buyer of excessive overtime including reason for excessive overtime.
- e. Factory shall assign a responsible person to monitor policies and procedures.

**Deadline  
Date:** 05/31/2012

**Action  
Taken:**

**Plan  
Complete:** No

**Plan  
Complete  
Date:**

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### **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 time records from October 2009 to November 17, 2010 the factory provided were incomplete/ inaccurate so the exact working time could not be verified due to the reasons below:

1) Through review of the broken needle records collected during factory tour and the information gathered from relevant worker interviews, it was noted that a worker had worked on October 20th and 29th, 2010. But the provided employment contracts and personnel records reflected that the worker just entered the factory on November 1st, 2010 and had no time records in October 2010.

2) Based on the review of two workers' handwritten work time records found in production area during factory tour and relevant worker interviews, it was noted:

a) Worker X worked in September, October and November 2010, and Worker Y worked in October and November 2010. But the factory could not provide the worker X's time records of September 2010, or the worker Y's time records of October 2010.

b) The handwritten work time records reflected that these 2 workers worked 12 hours per day from Monday to Saturday and 8 hours on Sundays sometimes. But the time records provided by management reflected that they only worked for 10 hours per day from Monday to Friday, 8 hours on Saturdays and rested on all Sundays.

3) The factory could not provide the 30 out of 217 employees' time records. Factory management explained that they were not the factory's employees and were hired by their foreman. But they could not provide any documents to support the explanation.

4) 10% of interviewed workers reported they had worked on Sundays occasionally during peak season, such as June and July 2010. But the time records provided by management reflected that no workers had ever worked on any Sundays during the past year.

**Plan Of  
Action:**

Findings 1, 2, 3 & 4):

- a. Factory shall develop a working hours control system and assign responsible managerial person to monitor and ensure its implementation and consistency of documentation.
- b. Factory shall keep actual register of working hours for all regular & OT hours for all workers with verification by employee signature including temporary and/or contract workers.
- c. Factory shall ensure all the production documentation matches with time records and that no double sets of records are kept.
- d. Factory shall provide regular and periodic training to employees on policies and laws regarding hours of work.
- e. Responsible managerial person shall lead verification procedure including but not limited to internal audit on a regular basis.

**Deadline  
Date:** 11/30/2011

**Action  
Taken:**

**Plan  
Complete:** No

**Plan  
Complete  
Date:**

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### Hours of Work: Annual Leave

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

#### Noncompliance

**Explanation:** Based on the review of leave and employment records as well as payroll records, it was noted that the factory did not provide 10 but only 5 days of paid annual leave in February 2010 for the 24 workers who should be entitled to 10 days of paid annual leave, as they had worked between 10 and 20 years in the factory. In terms of the remaining 5 days, the factory did not compensate them with 300% of their regular pay rate.

Legal Reference: Article 3 and 5 of the Regulations on Paid Annual Leave for Employees

**Plan Of  
Action:**

Finding 1):

- a. Factory shall provide legal annual leave to all the workers.
- b. Factory shall appoint a responsible person to be in charge of related issues and establish an internal monitoring policy to ensure compliance with the regulations.
- c. Factory shall compensate the 24 workers identified with the additional 5 days of paid annual leave or paid as OT compensation for these 5 days after consultation with the workers.
- d. Factory shall post leave policy in a visible common area and distribute it to worker's committee as applicable. Factory should provide benefit training for new hires including but not limited to review of leave policies.
- e. Factory shall review personnel files to determine if other workers were denied proper annual leave benefits and compensate accordingly.

**Deadline  
Date:** 11/30/2011

**Action  
Taken:**

**Plan Complete:** No

**Plan Complete Date:**

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### Hours of Work: Sick Leave

HOW.19 Employers shall provide workers with sick leave as required under local laws, regulations and procedures. (S)

#### Noncompliance

**Explanation:** According to factory rules, workers who had served in the factory for less than 10 years could only have 5 days of paid sick leave per year, and others could have 10 days of paid sick leave per year. This was below the legal requirement: workers could have paid sick leave for at least 3 months.

Legal Reference: Article 3 of the Medical Treatment Period Provision of Corporation Employee Illness or Non Work-related Injury

**Plan Of Action:** Finding 1):

- a. Factory shall establish leave policy in accordance with applicable law.
- b. Factory shall train managers on applicable law.
- c. Factory shall appoint responsible person to manage and monitor leave policy.
- d. Factory shall post leave policy in a visible common space and distribute to workers' committee as applicable. Factory should provide benefit training for new hires including but not limited to review of leave policies.

**Deadline Date:** 11/30/2011



**Action  
Taken:**

**Plan**      **No**  
**Complete:**

**Plan**  
**Complete**  
**Date:**

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