

FLA Audit Profile	
Country	USA
Factory	080082499E USA
IEM	Accordia Global Compliance Group
Date(s) in facility	November 30 - December 1, 2006
PC(s)	Nordstorm
Number of workers	225
Product(s)	Compression Socks
Production processes	Knitting, Sewing, Dyeing, Boarding, Packing

FLA Code/Compliance Issue	Country Law/Legal Reference	FLA Benchmark	Noncompliance	Risk of Noncompliance
1. Code Awareness				
Code Posting/Information		FLA Principle of Monitoring, Obligation of Companies: Establish and articulate clear, written workplace standards. Formally convey those standards to Company factories as well as to licensees, contractors and suppliers.	Code of Conduct was found posted on a wall in the cafeteria where workers frequent; however, view was obstructed.	
Worker/Management Awareness of Code		FLA Principle of Monitoring, Obligation of Companies: Ensure that all Company factories as well as contractors and suppliers inform their employees about workplace standards orally and through posting of standards in a prominent place (in local languages spoken by employees and managers) and undertake other efforts to educate employees about standards on a regular basis.	Workers not aware of Nordstrom code or FLA Code of Conduct or of Nordstrom's affiliation with FLA (related to code).	

Confidential Noncompliance Reporting Channel		FLA Principle of Monitoring, Obligation of Companies: 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.	There is no secure or confidential noncompliance reporting mechanism by which [Factory name] employees can report noncompliance to Nordstrom or FLA codes directly to the Participating Company.	
2. Forced Labor				
There will not be any use of forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise.				
3. Child Labor				
No person will be employed at an age younger than 15 (or 14 where the law of the country of manufacture allows) or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15.				
Age Documentation		Employers will maintain proof of age documentation for all workers, such as a birth certificate, which verifies date of birth.	The facility does not keep copies of employee identification on file for age verification purposes.	
4. Harassment or Abuse				
Every employee will be treated with respect and dignity. No employee will be subject to any physical, sexual, psychological or verbal harassment of abuse.				
5. Nondiscrimination				
No person will be subject to any discrimination in employment, including hiring, salary, benefits, advancement, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, or social or ethnic origin.				
6. Health and Safety				
Employers will provide a safe and healthy working environment to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of employer facilities.				

Evacuation Procedure	<p>29 CFR 1910.37(b)(i): Each exit route must be adequately lighted so that an employee with normal vision can see along the exit route. NFPA 101 Life Safety Code Section 7.8.1 Illumination of Means of Egress: Illumination of means of egress shall be provided to include exit access - designated stairs, aisles, corridors, ramps, escalators and passageways leading to an exit.</p>	<p>All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, unblocked aisles/exits, employee education, evacuation procedures, etc.) shall be complied with and workers shall be trained in proper safety, first aid, and evacuation procedures.</p>	<p>There is a need for more emergency lighting in the facility. In the dye house, 1 emergency light fixture found for the entire area (approximately 1500 square feet). In general, finding is that placement of emergency lighting fixtures do not appear to correspond with OSHA and NFPA requirement for proper illumination of means of egress in several areas of facility. Due to the physical size of enclosed areas or rooms, adequate emergency lighting may not be present.</p>	
Evacuation Procedure	<p>30 CFR 1910.37(b)(i): Each exit route must be adequately lighted so that an employee with normal vision can see along the exit route. NFPA 101 Life Safety Code Section 7.8.1 Illumination of Means of Egress: Illumination of means of egress shall be provided to include exit access - designated stairs, aisles, corridors, ramps, escalators and passageways leading to an exit.</p>	<p>All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, unblocked aisles/exits, employee education, evacuation procedures, etc.) shall be complied with and workers shall be trained in proper safety, first aid, and evacuation procedures.</p>	<p>An emergency exit in the dye house was blocked by buggies containing in-process products.</p>	
Evacuation Procedure	<p>31 CFR 1910.37(b)(i): Each exit route must be adequately lighted so that an employee with normal vision can see along the exit route. NFPA 101 Life Safety Code Section 7.8.1 Illumination of Means of Egress: Illumination of means of egress shall be provided to include exit access - designated stairs, aisles, corridors, ramps, escalators and passageways leading to an exit.</p>	<p>Emergency evacuation drills should be conducted at least annually.</p>	<p>Most recent fire drill was conducted September 14, 2005, more than 1 year before audit date.</p>	

Safety Equipment	29 CFR 1910.151: Where eyes or bodies of workers may be exposed to injurious corrosive materials, suitable facilities should be found within the work area for quick drenching or flushing of eyes and body.	All safety and medical equipment (such as fire fighting equipment, first aid kits, etc.) shall be in place, maintained as prescribed and accessible to the employees.	Eye wash station in dye house found in an unhygienic state and no evidence of periodic or regular inspection was found.	
Safety Equipment	29 CFR 1910.157(c)(1): The employer shall provide portable fire extinguishers and shall mount, locate and identify them so that they are readily accessible to employees without subjecting employees to possible injury.	All safety and medical equipment (such as fire fighting equipment, first aid kits, etc.) shall be in place, maintained as prescribed and accessible to the employees.	Fire extinguisher in dye house was blocked by buggies of in-process product.	
Ventilation/Electrical/ Facility Maintenance	29 CFR 1910.22(4)(c): No obstruction shall block access to an electrical panel. 3 foot clearance should be maintained in front of all panels and electric storage devices.	All ventilation, plumbing, electrical, and lighting services shall be provided and maintained to conform to applicable laws and prevent hazardous conditions to employees in the facility.	Electrical panels in dye house were blocked by buggies of in-process product.	
7. Freedom of Association and Collective Bargaining				
Employers will recognize and respect the right of employees to freedom of association and collective bargaining.				
8. Wages and Benefits				
Employers recognize that wages are essential to meeting employees' basic needs. Employers will pay employees, as a base, at least the minimum wage required by local law or the prevailing industry wage, whichever is higher, and will provide legally mandated benefits.				
9. Hours of Work				
Except in extraordinary business circumstances, employees will (i) not be required to work more than the lesser of (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture or, where the laws of such country will not limit the hours of work, the regular work week in such country plus 12 hours overtime; and (ii) be entitled to at least one day off in every seven day period.				
10. Overtime Compensation				

In addition to their compensation for regular hours of work, employees will be compensated for overtime hours at such premium rate as is legally required in the country of manufacture or, in those countries where such laws will not exist, at a rate at least equal to their regular hourly compensation rate.

Miscellaneous

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Miscellaneous		

IEM Findings							
Evidence of Noncompliance (Uncorroborated)	If Not Corroborated, Explain Why	Sources/ Documentation Used for Corroborating	Notable Features Implemented by Factory Management or Company	PC Internal Audit Findings (Optional)	PC Remediation Plan	Target Completion Date	Factory Response (Optional)
		Visual observation			Remove obstruction and ensure code of conduct remains in clear view.	1/25/2007	
		Monitors noted this noncompliance during visual inspection of facility, as well as during interviews with workers.			Train workers on code of conduct.	1/25/2007	

		Monitors noted this noncompliance during visual inspection and document review.			Ensure that employees are aware of an open communication channel between Nordstrom and the employees.	1/25/2007	
		Monitors noted this noncompliance during review of employee personnel files and I-9 files.			Keep copy of age documentation for all employees on file.	1/25/2007	

		Monitors noted this noncompliance during visual inspection of facility.			Ensure adequate emergency lighting exists for all facilities.	1/25/2007	
		Monitors noted this noncompliance during visual inspection of facility.			Clear all obstacles near emergency exits.	1/25/2007	
		Monitors noted this noncompliance during review of factory records.			Conduct fire drill annually.	1/25/2007	

Remediation		[Status]	Updates (Cite Date of Follow Up)		Third-Party Verification		Company Verificat
Company Follow Up (Cite Date of Follow Up)	Documentation	Completed, Pending, Ongoing	Company Follow Up	Documentation	External Verification (Date)	Documentation	Company Follow Up (Cite Date of Planned or Follow-up Visit, if Appropriate)
Obstruction was removed.	Pictures of clear visibility of code of conduct	Completed					
During biweekly associate meeting held on Monday, January 8, 2007, associates in all areas were made aware of the Nordstrom/FLA Codes of Conduct and Nordstrom's affiliation with the FLA. All new hires will be shown the posting of the code of conduct during orientation.	Meeting minutes	Completed					

<p>During biweekly associate meeting held Monday, January 8, 2007, associates were told again about the confidentiality in all areas of discussion. They can approach any manager in anonymity regarding all concerns. These biweekly meetings involve all employees, and notes from the meetings are taken and posted soon after the meeting for those who were absent.</p>	<p>Meeting minutes</p>	<p>Completed</p>					
<p>They verify that all employees are 18 years of age or older by using an I-9 form.</p>	<p>Copies of I-9 forms were sent.</p>	<p>Completed</p>					

<p>Factory consulted with fire inspector from [City name] and determined areas where additional emergency lighting was needed and added lighting to the dye house and packing department.</p>	<p>Pictures</p>	<p>Completed</p>					
<p>All emergency exits were unblocked. During the biweekly associate meetings held Monday, January 8, 2007, associates in all areas, including dye house, were reminded and encouraged to keep all exits clear of buggies or other items to allow unobstructed path to exits.</p>	<p>Pictures, minutes from meeting</p>	<p>Completed</p>					
<p>Fire drills were conducted for all shifts Wednesday, December 12, 2006. Factory is now aware that fire drills must be conducted twice a year and has established a schedule with the local fire department to ensure that they complete 2 drills a year.</p>	<p>Record of fire drill</p>	<p>Completed</p>					

<p>Eye wash station in dye house cleaned with an all-purpose cleaner and brush, checked for proper function and placed on a monthly checklist to ensure follow-up maintenance is completed.</p>	<p>Picture and record of cleaning schedule</p>	<p>Completed</p>					
<p>All fire extinguishers were unblocked. During the biweekly associate meetings held Monday, January 8, 2007, associates in all areas, including dye house, reminded and encouraged to keep all fire extinguishers clear to allow ease in reaching extinguisher in the event of a fire.</p>	<p>Pictures and Meeting notes</p>	<p>Completed</p>					
<p>All electrical panels were unblocked. During the biweekly associate meetings held Monday, January 8, 2007, associates in all areas, reminded and encouraged to keep all electrical panels clear for their own safety.</p>	<p>Pictures and Meeting notes</p>	<p>Completed</p>					

ion Follow Up
Documentation





