

FLA Audit Profile		Company
Country	Bangladesh	Comment: Outdoor Cap placed a test order of one full container with this factory in 2005. This was a shared audit between Outdoor Cap and Top of the World. Social Compliance Managers worked together with the factory to remediate all findings. Top of the World visited the factory in 2005 to verify compliance findings and Outdoor Cap visited the factory in February 2006. In 2006, Outdoor Cap had a few remaining pieces shipped. Since 2006, Outdoor Cap has not purchased any product from [factory]. If the Company begins business again with this factory in the future, it will resubmit the factory to the FLA IEM program as an active factory.
Factory name	38020586D	
IEM	LIFT Standards Ltd.	
Date(s) in facility	30th July, 31st July, 2nd August and 4th August 2005	
PC(s)	Top of the World and Out Door Cap Company	
Number of workers	948	
Product(s)	Caps and Hats	
Production processes	Cutting, sewing and finishing	

IEM Findings								
FLA Code/ Compliance issue	Country Law/Legal Reference	FLA Benchmark	Non-compliance	Risk of Non-compliance	Evidence of Non-compliance (un corroborated)	If not corroborated, explain why	Sources/Documentation used for corroborating	Notable Features implemented by Factory Management or Company
1. Code Awareness								
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 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.	Workers are unaware about the code of conduct and its purpose contents. No formal training system exists				Workers and management interview about the training and records reviewed	
Confidential non-compliance 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 confidential non-compliance reporting channel that exists in the factory				workers and management interview and recording system reviewed	
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								
Employment Records		Employers will maintain sufficient hiring and employment records to demonstrate and verify compliance with this Code provision	Workers are not provided with appointment letter and confirmation letter. The letters are signed by the works and only kept in the personnel files. Some Documents are not consistent: 8 - No appointment letter, 1 person - no confirmation letter, 5 appointment letter without sign of management, Employment contract does not contain signature from management, No settlement paper for the terminated workers. More over it takes at least 3 months time to complete one personnel file.				Workers interview and management interview and records of personnel file reviewed	

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Employment Records		Employers will maintain sufficient hiring and employment records to demonstrate and verify compliance with this Code provision	It takes 3 months time to open and complete a personnel file				Personnel File review and worker interviews	
Employment Records		Employers will maintain sufficient hiring and employment records to demonstrate and verify compliance with this Code provision	Contract papers are not complete. Reviewed and found 5 contract papers and 1 contract collected where management signature does not exist. Documents are not consistent: 8 - No appointment letter, 1 person - no confirmation letter, 5 appointment letter without sign of management, Employment contract does not contain signature from management, No settlement paper for the terminated workers.				Attendance record review and management interview and personnel files reviewed, worker interview	
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.	Workers age certificate is issued after the job application date and joining date.				Personnel files and age documentation reviewed and interviewed the certification process with management and nurse	
Childcare facilities	Childcare facility need to be in a separate building/place other than the production floor.	Childcare facilities will not physically overlap with production areas, and children will not have access to production areas.	Childcare facility is inside the factory premises on 4th floor. The childcare facility is not functional and used as informal store - dresses/ uniforms of the workers are kept in it. No child was available in the center and workers are unaware about the facility and its advantages.				Visual inspection and workers interview and training system quarry with management	

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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.								
Progressive Discipline		Employers will utilize progressive discipline, e.g., escalating discipline using steps such as verbal warning, written warning, suspension, termination. Any exceptions to this rule, e.g., immediate termination for theft or assault, shall be in writing and clearly communicated to the workers.	No formal disciplinary system i.e. policy and procedure exists.				Management interview and workers interview	
Progressive Discipline		Employers will utilize progressive discipline, e.g., escalating discipline using steps such as verbal warning, written warning, suspension, termination. Any exceptions to this rule, e.g., immediate termination for theft or assault, shall be in writing and clearly communicated to workers.	Workers are terminated for continuous absent from work for 3 – 4 days.				Personnel files and warning letter and termination cases	
Disciplinary Practices		Employers will utilize consistent written disciplinary practices that are applied fairly among all workers	No disciplinary policies and procedures are found and not practiced in the factory. Only paper maintained on disciplinary action is the warning letter. Some warning letter found where the reason of issuing the warning letter is not mentioned or ticked, at a time 3 warning is given in one letter and terminated without verify the reason.				Workers interview and personnel warning letters	
Training of Management in Disciplinary Practices		Employers will provide training to managers and supervisors in appropriate disciplinary practices	No formal training is provided on disciplinary systems				management and workers interview	
Records Maintenance		Employers will maintain written records of disciplinary actions taken.	No written records maintained for the number of disciplined workers or separated or migrated workers per month, the steps and procedures of disciplinary actions. Only warning letter is issues and also maintained properly with respective files. Warning come termination letter was found but no personnel file/ any paper of that person was available.				Management interview and personnel file check	
Verbal abuse		Employers will prohibit screaming, threatening, or demeaning verbal language.	Verbal abuse occurs in case of fail to achieve the production target, unauthorized absent and mistake in works. Workers has to stand in front of the sewing line for half and hour because of absent.				workers and supervisors interview and group discussion.	

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Monetary Fines and Penalties		Employers will not use monetary fines and penalties for poor performance	Workers attendance was omitted from the attendance register and result into salary deduction because of doing wrong / mistake in the work				worker and supervisor interview and attendance and payment record reviewed	
Monetary Fines and Penalties		Employers will not use monetary fines and penalties for poor performance	Workers attendance is turned into absent because of doing wrong which results into wages deduction. Approved leave is also deducted from the salary if special permission for leave with pay is given by the production in charge from the floor				Attendance record review and management interview and personnel files reviewed, worker interview.	
Other (Grievance Procedure)				Worker handbook is not provided to all the workers- Workers are not aware about the grievance and disciplinary system and procedure. Some of the workers only know about the existence of suggestion box but they are not clear and confident about the credibility and effectiveness of the suggestion box			Attendance record review and management interview and personnel files reviewed, worker interview and WWC member interview	

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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								
Fire Safety Health and Safety legal compliance		Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits	There is no fire fighting team trained on the issue only 3 persons name are written as fire fighter for the full factory who are not trained and workers also recognize these persons as responsible for fire fighter. No first aid policy and no doctor found, only a nurse (without professional academic and experience certificate) found, no first aid team found in the facility				Management interview, records reviewed and workers interview Personnel files reviewed	
Evacuation Procedure		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	Fire safety policy is not in local language and not posted and not available for workers. Fire drill is not arranged every months as mentioned in the factory internal policy. Workers are not trained on fire safety and first aid policy.				Management interview and visual inspection. Records and register reviewed	
Safety Equipment		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	First aid kits are not well-stocked and no one supervise the first aid boxes				Visual inspection and management interview	
PPE		Workers shall wear appropriate 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 hazardous elements including medical waste.	PPE are not provided to the workers (hand gloves- iron section, mask - overlock machine, ear plug - Kanasi special and bartek machine) and no training on the use of PPE is provided to workers				Visual inspection and management interview and workers interview	
Chemical Management		All chemicals and hazardous substances should be properly labeled and stored in accordance with applicable laws. Workers should receive training, appropriate to their job responsibilities, in the safe use of chemicals and other hazardous substances	Thinner is used without labeling and taking any safe measure				Visual inspection	

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Machinery Maintenance		All production machinery and equipment shall be maintained, properly guarded, and operated in a safe manner	Eye guard with the overlock and bartek machine is not used and some cases the guard are not found fixed with the machines				Visual inspection	
Sanitation in Facilities		All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with applicable laws	Number of male toilet is sufficient and according the local law. But female toilet need to be - 36 for 900 female workers but factory has 5 female toilet per floor and total - 15 toilets The canteen are not spacious enough to accommodate all the workers, as a result some workers take their lunch sitting on the floor. Sometimes water supply and washing facility is not available and sufficient during lunch hour.				Visual inspection and records review, group discussion with workers	
Worker Participation		Workers should be involved in planning for safety, including through worker safety committees	No workers safety committee found and no involvement or workers found				Workers and management interview	
Other (Childcare facility)			Child care facility in not functional, workers are not aware about the facility. Child care room is in the main building where production is ongoing not in a separate building				Visual inspection and worker interview	
Other (Qualification of the Medical Practitioner)			Technical staff (nurse and electrician i.e. in-charge of safety and health matters) do not have any academic and professional certificate and degree. They have only experience of working in their respective field but even those experience certificate is not maintained in the personnel file				Personnel File review	
7. Freedom of Association and Collective Bargaining								
Employers will recognize and respect the right of employees to freedom of association and collective bargaining								
				A Worker Welfare Committee has been selected during Jan 05. But the committee is ineffective and workers are not familiar with the members and their activities.			Attendance record review and management interview and personnel files reviewed, worker interview and WWC members interview	

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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								
Wage Benefits Awareness		Employers will communicate orally and in writing to all employees in the language of the worker the wages, incentive systems, benefits and bonuses to which all workers are entitled in that company and under the applicable law	workers are not aware about the salary fixation, incentive system, entitlement and benefits they are supposed to get				worker and management interview and group discussion with workers	
Payroll Reporting		Accurate and reliable payroll reporting, including pay stubs will be provided	Payroll is not in local language, double attendance record keeping and payment is practiced, no payment date is mentioned on the payroll,				Sample payroll check and documentation check, management interview	
Pay statement		Employers will provide workers a pay statement each pay period, which will show earned wages, regular and overtime pay, bonuses and all deductions	Deduction amount for absenteeism is not clearly mentioned in the payroll				Payroll checked and management interview	
Time-recording system		Time worked by all employees, regardless of compensation system, will be documented by time cards or other accurate and reliable recording systems such as electronic swipe cards	Time recording is manual and maintained in the register and in the full control of the supervisor or line in charge, workers have no authority in recording the in and out time in the factory. (Factory has initiated the thumb reader electronic system but it is not functional and will take more two months time)				visual inspection and worker and management and worker interview	
Legal benefits		Employers will provide all legally mandated benefits to all eligible workers	Leave benefit is not practiced properly. Earn leave is not given to workers, festival leave is paid only with the two eid holidays (5+5) days, Casual leave is some times paid and some times not depending on the superiors, Maternity leave is allowed but not paid. Even maternity leave is encouraged to avail two months instead of 12 weeks.				Worker interview and records review and management interview	
Legal Compliance for holiday/leave		Workers will be paid for holidays and leave as required by law	Friday work is paid as overtime but not compensated with another day off with in three days according the law				Worker and management interview and records review.	
False Payroll Records		Employers will not use hidden or multiple payroll records in order to hide overtime, to falsely demonstrate hourly wages, or for any other fraudulent reason.	Factory maintains hidden or multiple payroll records in order to hide overtime, to falsely demonstrate hourly wages				Management interview and records reviewed	
Accurate benefit compensation		All employees will be credited with all time worked for an employer for purposes of calculating length of service to determine the benefits to which workers are entitled	Some of the daily workers are working in the factory for a long time regularly (even maximum up to 4 years continuously and almost regularly) but have not been absorbed as regularized workers.				Attendance record review and management interview and personnel files reviewed, workers interview	

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Other				Newly joined workers name and attendance record are not maintained immediately after their joining. Workers found started working from 17th of the month but till the end of the month their name and attendance is not recorded in the attendance register. If the workers continue to come or become regular than their attendance is recorded by the line chief to prepare the monthly wages.			Supervisors and workers interview. Interview new workers and attendance records reviewed and full process reviewed	
Other				Wages is also deducted sometimes though leave is applied and approved by the management			Worker, Management interviews and review of personnel files and attendance records	
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								
Overtime Limitations		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. An extraordinary business circumstance is a temporary period of extra work that could not have been anticipated or alleviated by other reasonable efforts	Daily and weekly and monthly working hour with overtime is not maintained. Daily overtime is some times 4 hours a day and monthly more than 75 hours in June'05 and July'05. In December'04 the overtime crosses 100 hours a month. Continuous work happened in December'04, 6th and 20th May'05, 29th July'05				Worker interview and documents review with management	
Reduce Mandated OT		The employer will demonstrate a commitment to reduce mandated overtime and to enact a voluntary overtime system to meet unforeseen situations	No prove or documents of recording OT as voluntary				management interview and records review	
Explanation of continued required OT		If the employer repeatedly requires overtime in order to respond to the same situation, the employer will explain why it will not have sufficient staff on hand to avoid the necessity of overtime.	No explanation of continued required OT is maintained				management interview and records review	
Overtime Explanation		Employers shall be able to provide explanation for all periods when the extraordinary business circumstances exception has been used. Employers shall take reasonable steps to inform workers about the nature and expected duration of the circumstances	No record maintained as overtime reason explanation				management interview and records review	
Legal compliance with protected workers		The factory will comply with all applicable laws governing work hours, including those regulating or limiting the nature and volume of work performed by women or workers under the age of 18	Women work is carried out more than the legal limit i.e.. more than 8 pm and sometimes up to 10 pm.				Records reviewed and worker interview	

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Voluntary OT		Overtime hours worked in excess of code standard will be voluntary	no recording system of voluntary overtime system				Records reviewed and worker interview	
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.								
Accurate recording of OT hours worked		Employees will be paid for all hours worked in a workweek. Calculation of hours worked must include all time that the employer allows or requires the worker to work	As the working hour and overtime recording system is manual and maintained by supervisor there is evidence of manipulating the OT data by the floor level management as a punishment of mistake in the work				Management interview and attendance records review and payroll reviewed	
OT Compensation Awareness		Workers shall be informed about overtime compensation rates, by oral and printed means	Workers are not aware about the overtime rate and calculation system				Worker interview	
Miscellaneous								
Other (new and migrated workers)				Factory does not maintain the number and the list of migrated and newly recruited workers per month. On the request of auditor factory could only provide the month wise new recruits records but failed to provide the migration record.			Attendance record reviewed and management interview and personnel files reviewed, workers interview	

Remediation				Updates (Cite Date of Follow up)		
PC Remediation plan	Target Completion Date	Factory Response (Optional)	Company follow up (Cite date of follow up)	Documentation	Company Follow up	Documentation
Outdoor Cap and Top of the World (ODC/TOW) request factory to send your records of workers being trained in every work station. ODC/TOW require detailed notes of this training and signed documentation of workers that attended the training. ODC/TOW request factory to send picture of supervisor that trained workers and his signed documentation of training for our records. • Send us pictures of suggestion/grievance boxes for workers in the factories and advise how many boxes are available and the location of these boxes. • Advise who is in charge of collecting the suggestion/grievances from	1st week of August 2006	Factory will send photos of the training of Code of Conduct. They will also send notes of the training and signed documentation from workers that took the training by the first week of August 2006.				Factory sent photos of CoC meetings held for employees and signature sheets from all employees that attended. Received 8/23/06 on file at ODC and TOW.
• ODC/TOW requests factory to send us pictures of suggestion/grievance boxes for workers in the factories and advise how many boxes are available and the location of these boxes. • ODC/TOW requests factory to advise who is in charge of collecting the suggestion/grievances from these boxes and how often are they collected. • ODC/TOW requests factory to send us procedures of how the suggestions/grievances are handled so that they can be resolved for the worker.	1st week of August 2006	Factory will send pictures of suggestion/grievance boxes, quantity of boxes, location of boxes along with documents of procedures of how suggestion/grievances are collected and handled.				Factory sent photos of suggestion/grievance boxes in place and procedures for how suggestion/grievances are collected and handled. These items are on file at ODC and TOW.
1. The factory must give each employee an appointment letter and confirmation letter as required by local law. A copy of the letters will be kept in the employee's personnel files at all times. Management must sign both the appointment letter and confirmation letter. The original appointment and/or confirmation letters should include the statement, "I, employee name, have read and received a copy of this letter." Have the employee sign and date the letter. Give a copy to the employee for their records. This is to be implemented immediately for all appointments and new hires. The factory is to send at least 5 copies of the newly signed confirmation/appointment letters to ToW/ODC by Nov 1, 2005.	11/1/2005	1. The factory has already started to give each employee an appointment letter and confirmation letter as required by local law. The factory is also keeping a copy of the letters in the employee's personnel files at all times. Will send requested items by 11/1/05.	1. The factory sent 5 copies of employee appointment/confirmation letters on 10/31/05, showing management signatures and employee signatures.	1. The factory sent 5 copies of employee appointment/confirmation letters on 10/31/05, showing management signatures and employee signatures.		
2. The factory management must sign all employee contracts; the employee must also sign the contract. Keep a copy of the contract in the employee's files and give a copy of the contract to the employee. This is to go into effect immediately. Please send ToW /ODC 5 copies of employee contracts with employee and management signatures by Nov 1, 2005.	11/1/2005	2. Both the factory management and the employee are signing all employee contracts. The factory is keeping a copy of the contract in the employee's files and giving a copy of the contract to the employee. Will send requested items by 11/1/05.	2. The factory sent 5 copies of employees contracts on 10/31/01, showing management signatures and employees signature.	2. The factory sent 5 copies of employee contracts on 10/31/05, showing management signatures and employee signatures.		
3. The factory must create a "Settlement" document for all terminated employees. This document should cover all benefits and monies the employee is to receive as required by local law. This is to go into effect immediately. Please send ToW/ODC 5 copies of "settlement" documents by Nov 1, 2005.	11/1/2005	3. The factory does not terminate any worker. Most of the workers go away by their resignation letter.	4. The factory sent 5 copies of each service book, appointment letter and age determination documents on 10/31/05. We are requesting a policy and procedure stating responsible parties to make sure this happens prior to employment of an employee.	4. The factory sent 5 copies of each service book, appointment letter and age determination documents on 10/31/05.	3. Factory has still not sent settlement document for terminated employees. 2nd request made after Top of the World follow-up audit in December 2005. Factory deadline to comply February 10, 2006. Outdoor Cap to check on factory follow-up audit February 19, 2006. On May 23rd factory sent settlement documents completing this request.	
4. The factory shall immediately have the service book, appointment letter including break-down of wages, an age and fitness certificate completed upon hiring an employee. Send ToW/ODC 5 copies of new employees service books, appointment letters including break-down of wages, an age and fitness certificate, by Nov 1, 2005.		4. The factory is now giving the service book, appointment letter including break-down of wages, an age and fitness certificate completed upon hiring an employee. Will send requested items by 11/1/05.				

Remediation				Updates (Cite Date of Follow up)		
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The factory shall immediately have the service book, appointment letter including break-down of wages, an age and fitness certificate completed upon hiring an employee. Send Top of the World/Outdoor Cap 5 copies of new employees service books, appointment letters including break-down of wages, an age and fitness certificate, by November 1, 2005.	11/1/2005 & 11/15/2005	The factory is now giving the service book, appointment letter including break-down of wages, an age and fitness certificate completed upon hiring an employee. Will send requested items by 11/1/05.	Factory has sent copies of services books, appointment letters, etc. to satisfy this request. Dec. 05.	Copy of service book and appointment letters kept in files.		
The factory management must sign all employee contracts; the employee must also sign the contract. Keep a copy of the contract in the employee's files and give a copy of the contract to the employee. This is to go into effect immediately. Please send Top of the World/Outdoor Cap 5 copies of employee contracts with employee and management signatures by November 1, 2005.	11/1/2005 & 11/15/2005	Both the factory management and the employees are signing all employee contracts. The factory is keeping a copy of the contract in the employee's files and giving a copy of the contract to the employee. Will send requested items by 11/1/05.	Factory has sent copies of services books, appointment letters, etc to satisfy this request. Dec. 05.	Copy of service book and appointment letters kept in files.		
The factory must make age determination prior to the employees joining date with the factory. This age determination must be documented in the employee files. This is to be implemented immediately for all new hires. Send Top of the World/Outdoor Cap 5 copies of age determination of newly hired employees by November 1, 2005.	11/1/2005	Factory Response: In our factory, child labor is strictly prohibited. Normally the factory takes age determination certificate prior to the employees joining date. This age determination also documented in the employee files. We will send all requested items by 11/1/05.	The factory sent 5 copies of age determination certificates. We are requesting a policy and procedure from the factory stating that age determination must be made prior to an employee's start date. Please send by December 15, 2005.	The factory sent 5 copies of age determination certificates on 10/31/05. Factory gave TOW copies of policy and procedures December 05.		
The factory must ensure that the childcare facility is clearly away from any production area. The childcare facility must be kept clear of all obstacles that are not related to childcare. The factory must now promote the use of the child care facility to the employees. We recommend the factory contract with Lift-Standards to complete a consultancy training to help bring many different areas of the factory into compliance, by doing this the female workers will be asked what would make the child care acceptable for them and then this information would be brought to management for further discussion. Send Top of the World/Outdoor Cap the training date that is confirmed with Lift-Standards for the consultancy training by November 1, 2005.	11/1/2005	Factory Response: Now it is impossible to us for shifting the childcare center from the production floor. But in the future, we shall try to shift child care from the production floor. Now the factory promotes the use of the child care facility to the employees. We are taking the necessary actions to make day care center functional. We shall send information about the day care center by 11/1/2005.	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. Factory is no longer using room for storage, but not utilizing as child care room at this time either, Dec. 05		ODC to discuss child care issue with factory management at Feb. 06 visit ODC toured child care facility which is located in the production facility, no children are enrolled in child care facility at this time. No updates have been made as of 10/17/06.	

Remediation				Updates (Cite Date of Follow up)		
PC Remediation plan	Target Completion Date	Factory Response (Optional)	Company follow up (Cite date of follow up)	Documentation	Company Follow up	Documentation
The factory will attend a training of supervisors/management on treatment of employees and disciplinary actions. We are sending the training outline from Lift-Standards and we, Top of the World/Outdoor Cap, fully recommend that [factory] contract with Lift-Standards Ltd. to complete this training program which consist of 2 days disciplinary and CoC training and a consultancy 4 months program. See attached list of disciplinary procedures as a reference of what your system should resemble. Please send Top of the World/Outdoor Cap the factory's revised policies and procedures relating to discipline by and a set date for the training November 1, 2005.	11/1/2005	Factory Response: The factory is arranging training programs for supervisors/management on treatment of employees and disciplinary actions. We will send revised policies and procedures and a confirmed training date by 11/1/05.	The factory has chosen not to hire Lift Standards Ltd. for the training. They have hired a person to help the factory become compliant. The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. Factory has established and posted disciplinary policy and procedures. Training has occurred for management. Training to be provided to the workers the month of	Copies of the policy and procedures are kept in files at ODC and TOW.	ODC to discuss when training will be given to the workers.	Factory will send signed documentation from the workers by August 1, 2006.
According to the law "The Employment of Labor (Standing Orders) Act, 1965", the employer is authorized to terminate a worker if s/he is absent from work for more than 10 days without prior permission or information to the management. This includes that upon the return the workers is not able to give a justified explanation. In this case a registered letter will be sent to the temporary and permanent address of the worker with the information of loss of lien and request to report with a given date. If his report does not happened as outlined in a registered letter, s/he can be lawful terminated. The factory shall immediately starting complying with local law and shall amend your employee handbook to state as such. Please send Top of the World/Outdoor Cap a copy of the revised employee handbook translated into English and in local language highlighting this change.		We shall immediately start complying with local law and shall amend our employee handbook. We shall send all requested items by 11/1/2005.	The factory has chosen not to hire Lift Standards Ltd. for the training. They have hired a person to help the factory become compliant. The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. Factory has established and posted disciplinary policy and procedures. Training has occurred for management. Training to be provided to the workers the month of July 2006.	Copies of the policy and procedures are kept in files at ODC and TOW.	ODC to discuss when training will be given to workers.	Factory will send signed documentation from workers by August 1, 2006.
The factory will attend a training of supervisors/management on treatment of employees and disciplinary actions. We are sending the training outline from Lift Standards Ltd. and we, Top of the World/Outdoor Cap, fully recommend that [factory] contract with Lift Standards Ltd. to complete this training program which consist of a 2 day disciplinary and CoC training and a consultancy 4 months program. See attached list of disciplinary procedures as a reference of what your system should resemble. Please send Top of the World/Outdoor Cap the factory's revised policies and procedures relating to discipline by and a set date for the training November 1, 2005.	11/1/2005	Factory Response: The factory is arranging training programs for supervisors/management on treatment of employees and disciplinary actions. We will send revised policies and procedures and a confirmed training date by 11/1/05.	The factory has chosen not to hire Lift Standards for the training. They have hired a person to help the factory become compliant. The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. Factory has established and posted disciplinary policy and procedures. Training has occurred for management. Training will be provided to the workers by the Social Compliance manager the month of July.	Copies of the policy and procedures are kept in files at ODC and TOW.	ODC to discuss when training will be given to workers.	Factory will send signed documentation from workers by August 1, 2006.
The factory will attend a training of supervisors/management on treatment of employees and disciplinary actions. We are sending the training outline from Lift-Standards and we, Top of the World/Outdoor Cap, fully recommend that [factory] contract with Lift-Standards to complete this training program which consist of a 2 day disciplinary and CoC training and the a consultancy 4 month program See attached list of disciplinary procedures as a reference of what your system should resemble. Please send Top of the World/Outdoor Cap the factory's revised policies and procedures relating to discipline by and a set date	11/1/2005	Factory Response: The factory is arranging training programs for supervisors/management on treatment of employees and disciplinary actions. We will send revised policies and procedures and a confirmed training date by 11/1/05.	The factory has chosen not to hire Lift Standards for the training. They have hired a person to help the factory become compliant. The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. Factory has established and posted disciplinary policy and procedures.	Copies of the policy and procedures are kept in files at ODC and TOW.	ODC to discuss when training will be given to workers.	Factory will send signed documentation from workers by August 1, 2006.
The factory will attend a training of supervisors/management on treatment of employees and disciplinary actions. We are sending the training outline from Lift-Standards and we Top of the World/Outdoor Cap fully recommend that [factory] contract with Lift-Standards to complete this training program which consist of 2 days disciplinary and CoC training and the a consultancy 4 months program . We are also sending you a list of disciplinary procedures as a reference of what your system should resemble. Please send Top of the World/Outdoor Cap the factory's revised policies and procedures relating to discipline and a confirmed training date by November 1, 2005.	11/1/2005	Factory Response: The factory is arranging training programs for supervisors/management on treatment of employees and disciplinary actions. We will send revised policies and procedures and a confirmed training date by 11/1/05.	The factory has chosen not to hire Lift Standards for the training. They have hired a person to help the factory become compliant. The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. Factory has established and posted disciplinary policy and procedures. Training has occurred for management. Training to be	Copies of the policy and procedures are kept in files at ODC and TOW.	ODC has requested signed documentation of training by the manager.	Factory will send signed documentation from workers by August 1, 2006.
The factory will attend a training of supervisors/management on treatment of employees and disciplinary actions. We are sending a training outlined from Lift-Standards and we Top of the World/Outdoor Cap fully recommend that [factory] contract with Lift-Standards to complete this training program. Please send Top of the World/Outdoor Cap the factory's revised policies and procedures relating to discipline and a confirmed training date by November 1, 2005.	11/1/2005	Factory Response: The factory is arranging training programs for supervisors/management on treatment of employees and disciplinary actions. We will send revised policies and procedures and a confirmed training date by 11/1/05.	The factory has chosen not to hire Lift Standards for the training. They have hired a person to help the factory become compliant. The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. Factory has established and posted disciplinary policy and procedures. Training has occurred for management Thru worker interviews, no evidence of continued	Copies of the policy and procedures are kept in files at ODC and TOW and employee interviews.	ODC has requested signed documentation of training by the manager.	Factory will send signed documentation from workers by August 1, 2006.

Remediation					Updates (Cite Date of Follow up)	
PC Remediation plan	Target Completion Date	Factory Response (Optional)	Company follow up (Cite date of follow up)	Documentation	Company Follow up	Documentation
The factory will immediately STOP the practice of omitting workers attendance from the attendance register; this is a form of informal punishment. Please send Top of the World/Outdoor a copy of the attendance record for the embroidery section for the months of September and October 2005 and a letter from top management that this practice has immediately been corrected by November 15, 2005.	11/15/2005	Factory Response: The factory will immediately STOP the practice of omitting workers attendance from the attendance register. The factory shall send a copy of the attendance register record for the embroidery section as requested for the months of Sept. and Oct. 2005 and a letter from management stating as such by 11/15/2005.	The factory has stopped the practice of omitting workers attendance from attendance register.	Copy of attendance register kept in files.		
The factory will immediately STOP the practice of omitting workers attendance from the attendance register; this is a form of informal punishment. Please send Top of the World/Outdoor a copy of the attendance record for the embroidery section for the months of September and October 2005 and a letter from top management that this practice has immediately been corrected by November 15, 2005.	11/1/2005	The factory will immediately STOP the practice of omitting workers attendance from the attendance register. The factory shall send a copy of the attendance register record for the embroidery section as requested for the months of Sept. and Oct. 2005 and a letter from management stating as such by 11/15/2005.	The factory has stopped the practice of omitting workers attendance from attendance register.	1. Copy of attendance register kept in files.		
The factory shall immediately give all workers a worker handbook, also the factory shall post their grievance and disciplinary policies on notice boards through out the factory and we recommend that you have the WWC start collecting the suggestion box comments, review the complaints/suggestions, and give to management. Management should respond back to the WWC within a specified period of time and the WWC can post the resolutions to the problems or comment on a notice board soothe employees can see the effectiveness of this communication system. Send Top of the World/Outdoor Cap photos of the posted grievance and disciplinary policies and a new procedure for the involvement of the WWC in this process by November 1, 2005.	11/1/2005 & 11/15/2005	Factory Response: The factory shall immediately give all workers a worker handbook, also the factory shall post their grievance and disciplinary policies on notice boards through out the factory. The factory will send photos of the posted policies and a new procedure for the involvement of the WWC is in the process by 11/1/05.	The factory provided copy of handbook. Currently the factory is in the process of updating their handbook and will submit a new handbook by Feb. 15, 2006. Outdoor Cap to check for new handbook on Feb 06 visit.	Copy of handbook kept in files.	ODC reviewing and working with factory on revised handbook and training of workers.	

Remediation				Updates (Cite Date of Follow up)		
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1. The factory shall contact the local fire marshal and have a training conducted with the current fire fighting team. Also, have the local fire fighting team Keep meeting notes from this training on file. Training should be done quarterly. The factory will train all employees on who the fire fighting team members are on a quarterly basis. Meeting notes are to be kept. Photos on the fire fighting team need to be posted in the canteen, production area, at all entrances and any place employees gather. The training will be completed by November 1, 2005 and meeting notes sent to Top of the World/Outdoor Cap. Send photos of the fire fighting team photos as they are posted in all areas of the factory by November 1, 2005. 2. Per the Bangladesh Factories Rules, 1979; The ambulance room or dispensary shall be in charge of a qualified medical practitioner assisted by at least one qualified compounder and nurse and such subordinate staff as the Chief Inspector may direct. The medical practitioner shall always be available on call during working hours.	11/1/2005	Factory Response: 1. The factory shall contact the local fire marshal and have a training conducted with the current fire fighting team. The factory will keep meeting notes from this training on file. The factory will send photos of the posted fire fighting team photos at the factory by 11/1/2005. 2. The factory has already created a first aid policy. The factory will hire a qualified medical practitioner and at least one qualified compounder and nurse as soon as possible. The factory will send us evidence this has been completed as soon as possible.	1. The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. 2. The factory sent a copy of their first aid policy on 10/31/05. We are requesting a procedure from the factory stating who is responsible for maintaining the first aid boxes by December 15, 2005. The factory did not send evidence of an appointed medical practitioner that is to be on-call at all times during factory hours. Please send medical certificate and contract of the appointment by December 15, 2005.	1. The factory has established and trained a fire fighting team, Dec. 05. Meeting notes and photos of the members were sent. 2. The factory sent a copy of their first aid policy on 10/31/05. The factory sent 2 letters from hospital personnel for Mrs. *** (***) from *** Hospital, as evidence she has been certified.	Factory sent copy of The Letter of Appointment of a part-time doctor that started on 4/16/06 that will be in the factory 2 days a week and on call. Advised factory by law that a doctor should be on the premises at all times but this is a step in the right direction. Also sent was nurse's certificate.	
In accordance with Section 22 of the Factories Act, 1965, and Instruction Number F.S.O. CD/4409/4(120) dated 9/11/97 of the Fire Service, each factory shall conduct at least 1 fire escape drill every month, and maintain proper details of the drill. The factory shall start immediately adhering to local law by conducting a monthly fire drill. These fire drills should be kept in a log. Please send Top of the World/Outdoor Cap a copy of the fire drill log and photos of the drill for the month of September and October 2005 by November 1, 2005.	11/1/2005	Factory Response: Fire safety policy already been made and posted in the notice board. Fire drills are now kept in a log. Will send copy of log and photos of monthly drill for the month of Sept and Oct. 2005 by 11/1/2005.	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. Factory has now posted the fire safety policy in the local language. Factory conducts monthly fire drill - confirmed by TOW through worker interviews, Dec. 05.	Confirmed thru worker interviews, copies of notes kept in files.		
According to the Factories Act 1965, Section 44, and Factories Rules 1979, Section 55 every factory shall provide and maintain at least 1 first aid box with its prescribed contents for every 150 workers, in the charge of a person trained in the use of first aid. The factory shall comply with local law and properly stock all first aid kits at the factory as stated above and create a policy and procedure for the kits to be checked weekly for re-stocking. Please send Top of the World/Outdoor Cap photos of the completely stocked first aid kits and a copy of the new policy and procedures for re-stocking of the first aid kits by November 1, 2005.	11/1/2005	Factory Response: The factory has already created a policy and procedure for the kits to be checked weekly for re-stocking. The factory will send photos of the completely stocked kits and a copy of the new policy and procedures for re-stocking by 11/1/05.	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. TOW found that first aid kits still not well stocked in Dec. 05, TOW will send a fully stocked first aid kit as an example by 2-15-06. Outdoor Cap to check on February 19 factory follow-up visit.		ODC to check all first aid kits at factory during Feb. visit. ODC found first aid kits to be stocked well. Also was told that the factory will model their first aid kits as the one TOTW sends.	
The factory shall immediately supply all PPE to necessary employees and train the employees on the use of the protective equipment. Please send photos of employees wearing required PPE by November 1, 2005.	11/1/2005	Factory Response: The factory shall supply all PPE to necessary employees as soon as possible and train the employees on the use of the protective equipment. The factory will send photos as soon as possible	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. TOW found again that PPE was not provided to workers Dec. 05. Outdoor Cap to check again on Feb. 19th visit.		ODC to check for PPE used by workers on factory tour. ODC toured the factory and saw workers using PPE. Several photos were taken and on file.	
The factory shall immediately label all chemical in the local language and English and post Material Safety Data Sheets (MSDS) for all chemicals. Send Top of the World/Outdoor Cap photos of the labeled chemical containers and copies of the MSDS sheets by October 1, 2005.	11/1/2005	Factory Response: The factory has already labeled all chemicals in the local language and English. They have posted MSDS sheets for all chemicals. The factory will send photos of the labeled containers and copies of the MSDS sheets within short time.	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. Follow-up audit in Dec. 05 showed thinner marked and MSDS checks being followed.	Tour of factory.		

Remediation				Updates (Cite Date of Follow up)		
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The factory shall immediately supply all PPE to necessary employees and train the employees on the use of the protective equipment. Please send photos of employees wearing required PPE by November 1, 2005.	11/1/2005	Factory Response: The factory shall supply all PPE to necessary employees as soon as possible and train the employees on the use of the protective equipment. The factory will send photos as soon as possible	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. TOW found again that PPE was not provided to workers Dec. 05. Outdoor Cap to check again on Feb. 19th visit.		ODC to check for PPE used by workers on factory tour. ODC toured the factory and saw workers using PPE. Several photos were taken and on file.	
1. We suggest that the factory re-allocated the number of restrooms between male and female, you have too many for the men and not enough for the females. The total number of female toilets required by law should be increased from 15 to 36 by November 1, 2005. If after re-allocation of the bathrooms, you still do not have enough for the women, then you will have to install new facilities for the women to bring your total to 36. Please send Top of the World/Outdoor Cap your plans to comply with local law by increasing the number of female totals to 36 by November 1, 2005. 2. We recommend that the factory stagger the lunch times to accommodate all workers comfortable during lunch breaks if possible, otherwise you will need to enlarge the canteen to accommodate all the workers, and to supply water and washing facilities in the canteen area for the employees. Send Top of the World/Outdoor Cap your plans to	11/1/2005	Factory Response: 1. We will take action for this and will send you our plans to comply with local law by 11/1/2005. 2. We have taken necessary action for this. We will send all information by 11/1/2005 as requested.	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. 1. December 05 follow-up audit found the factory still in the process of increasing the number of toilets to the required level. IN an effort to fulfill this requirement the factory has opened the 4th floor toilets to the workers. 2. The factory is now staggering the lunch times to alleviate over full canteen area.		The factory has realigned the # of bathrooms for women and men to ensure enough for women giving the women 41 and the men 15.	
The factory shall create and appoint some employees to a worker safety committee by November 1, 2005. This committee shall meet at least quarterly and meeting notes must be kept. Please send Top of the World/Outdoor Cap a list of all members of the committee and a plan of upcoming meetings for this committee by November 1, 2005.	11/1/2005	Factory Response: The factory shall create a worker safety committee by 11/1/05. This committee shall meet at least quarterly and meeting notes must be kept. The factory will send a list of all members of the committee and a plan of upcoming meeting by 11/1/05.	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. The factory has established a workers safety committee.	Photos of members sent and kept in file.		
The factory must ensure that the childcare facility is clearly away from any production area. The childcare facility must be kept clear of all obstacles that are not related to childcare. The factory must now promote the use of the child care facility to the employees. We recommend the factory contract with Lift-Standards to complete a consultancy training to help bring many different areas of the factory into compliance, by doing this the female workers will be asked what would make the child care acceptable for them and then this information would be brought to management for further discussion. Send Top of the World/Outdoor Cap the training date that is confirmed with Lift-Standards for the consultancy training by November 1, 2005, see attached information regarding this program.	11/1/2005	Factory Response: Now it is impossible to us for shifting the childcare center from the production floor. But in the future, we shall try to shift child care from the production floor. Now the factory promotes the use of the child care facility to the employees. We are taking the necessary action to make day care center functional. We shall send information about the daycare center by 11/1/2005.	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. The factory is no longer using the facility for uniform storage. Employees are aware other facility exists and is functional, however it is not being used. Outdoor Cap will check at Feb. follow-up audit.		ODC to discuss child care issue with factory management at Feb. 06 visit ODC toured child care facility which is located in the production facility, no children are enrolled in child care facility at this time.	
The factory shall create a first aid policy immediately. The factory shall hire a qualified medical practitioner and at least one qualified compounder and nurse as required by local law by October 1, 2005. Send Top of the World/Outdoor Cap a copy of the first aid policy and copies of the medical staff's certificates and photos by November 1, 2005 as evidence.	11/1/2005 & 11/15/2005	The factory has already created a first aid policy. The factory will hire a qualified medical practitioner and at least one qualified compounder and nurse as soon as possible. The factory will send us evidence this has been completed as soon as possible.	The factory sent a copy of their first aid policy on 10/31/05. We are requesting a procedure from the factory stating who is responsible for maintaining the first aid boxes by December 15, 2005. The factory did not send evidence of an appointed medical practitioner that is to be on-call at all times during factory hours. Please send medical certificate and contract of the appointment by		ODC to discuss with factory management about hiring a medical practitioner, factory has hired a medical practitioner part-time.	
The factory shall request the WWC to have monthly meetings starting immediately, document the meetings and help to promote this committee with the workers. Post photos of the WWC members in all areas of the factory where employee may gather, so the general employees can identify who their WWC committee members are. Send Top of the World/Outdoor Cap meeting notes in the local language and translated into English for the October 2005 meeting and photos of the WWC members posted at the factories by November 15, 2005.	11/1/2005 & 11/15/2005	The WWC is now arranging meetings and help to promote this committee with the workers. The factory shall send meeting notes for Oct. and photos of the WWC members posted at the factory by 11/15/2005.	TOW found evidence of increased maternity benefits and financial assistance for housing for workers through the WWC involvement during worker interviews in Dec. 05.		ODC reviewing and working with factory on revised handbook and training of workers.	

Remediation					Updates (Cite Date of Follow up)	
PC Remediation plan	Target Completion Date	Factory Response (Optional)	Company follow up (Cite date of follow up)	Documentation	Company Follow up	Documentation
The factory shall immediately start communicating with the employees in writing and hold an employee meeting to explain the employee's wages, incentives systems, benefits and bonuses that each employee is entitled to by law. Send Top of the World/Outdoor Cap a copy of the meeting notes and photos from the employee meetings by November 1, 2005.	11/1/2005	Factory Response: The factory shall immediately start communicating with the employees in writing and hold an employee meeting to explain the employee's wages, incentives systems, benefits and bonuses that each employee is entitled to by law. The factory will send a copy of the meeting notes and photos of the meetings held by 11/1/05.	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. The factory provided TOW with employee meeting notes on training of wages and benefits. Also signed attendance sheet from the meeting, Dec. 05.	Meeting notes from benefits and wage meeting and attendance sheet kept in files.		
The factory will change the payroll system to be in the local language starting October, 2005. Please send a copy of the payroll records for October by November 15th to Top of the World/Outdoor Cap. Double record keeping is not an acceptable practice. This must be stopped immediately. Please have upper management draft a letter to Top of the World and Outdoor Cap stating they will no longer keep double books to hire overtime hours in the future.	11/15/2005	Factory Response: The factory is trying to change the payroll system in the local language. Double record keeping is fully stopped now.	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. The factory submitted a letter from upper management stating that the practice of double books to hide overtime has stopped and will not continue to occur, Dec. 05.	Letter is kept in factory file.		
The factory will change the payroll system to be in the local language starting October, 2005. Please send a copy of the payroll records for October by November 15th to Top of the World/Outdoor Cap. Double record keeping is not an acceptable practice. This must be stopped immediately. Please have upper management draft a letter to Top of the World and Outdoor Cap stating they will no longer keep double books to hire overtime hours in the future.	11/15/2005	Factory Response: The factory is trying to change the payroll system in the local language. Double record keeping is fully stopped now.	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. The factory submitted a letter from upper management stating that the practice of double books to hide	Letter is kept in factory file.		
The factory has initiated a thumb reader time keeping system, but it is not currently operating. Until this system is operating correctly, the factory will need to have alternative reliable system in place, such as time cards that the employees punch, not the supervisors. Please confirm you will have the employees start using time cards to clock in and out until the thumb reader system is operational. Please send Top of the World/Outdoor Cap copies of time cards for 10 employees for the month of October 2005, by November 15th.	11/15/2005	Factory Response: The employees are using time cards to clock in and out until the thumb reader system is operational. The factory will send time cards for 10 employees for the month of October by 11/15/05.	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. The factory has completely installed and is currently using the finger print system for recording time. Outdoor Cap to check on visit in February 06.			
Based on local laws concerning leave, the factory shall immediately start following local law and giving the employees the legally required leaves as stated for annual leave, festival leave, casual and sick leave and maternity leave. Management shall revise the employee handbook to state the above policies and send Top of the World/Outdoor Cap a copy of the revised handbook in the local language and in English by November 1, 2005.	11/1/2005	Factory Response: The factory has already started to give sick leave and maternity leave. They shall immediately start following local law and giving the employees the legally required leaves as stated above for annual leave, festival leave and casual leave. The factory will send a copy of the revised handbook by 11/1/2005.	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. The factory has established a log for leave and maternity leave. Factory has provided copies of paperwork, Dec. 05. Still need a copy of revised worker handbook, Outdoor Cap to check on Feb. 2006 visit.	Factory has provided copies of paperwork, Dec. 05.	ODC working with factory on revised handbook. Once finalized asking factory to confirm training of workers.	
The factory shall immediately start giving all employees who work on a weekly holiday a substitute day off within the legally subscribed 3 days of the weekly holiday. Send Top of the World/Outdoor Cap 10 employee time cards, attendance records and salary sheets for the month of October 2005 by November 15th as evidence this has been corrected.	11/15/2005	Factory Response: The factory has started to give all employees who work on a weekly holiday a substitute day off within the legally subscribed 3 days of the weekly holiday. The factory will send 10 time cards, attendance records and salary sheets for the month of October by 11/15/05.	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. The factory sent time cards, attendance records and salary sheets showing that they are providing employees with	Documents kept in factory files.		
Double record keeping is not an acceptable practice. This must be stopped immediately. Please have upper management draft a letter to Top of the World and Outdoor Cap stating they will no longer keep double books to hire overtime hours in the future.	11/1/2005	Factory Response: Double record keeping has already been stopped.	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. The factory submitted a letter from upper management stating that the practice of double books to hide overtime has stopped and will not continue to occur, Dec. 05.	Letter is kept in factory file.		
The factory shall immediately recognize the time each employee has worked with the company and pay them according to local law. Please send Top of the World/Outdoor Cap a complete record of all employees showing the date of hire and the current pay scale and the gradation pay scale required by local law by November 15, 2005.	11/1/2005 & 11/15/2005	Factory Response: The daily workers don't work regularly. Most of them work 3 days / 4 days in a week. So the factory has not absorbed them as regularized workers.	The factory submitted records showing the immediate recording of new employee's attendance, time cards and salary sheets, Dec. 05.	Records kept in the factory files.		

Remediation				Updates (Cite Date of Follow up)		
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The factory shall immediately have all new employees listed on all attendance records starting from the date of hire. Send Top of the World/Outdoor Cap 5 complete sets of new employee's records, showing their applications, contracts, and for the month of October 2005, their attendance records, time cards and salary sheets by November 15, 2005.	11/15/2005	Factory Response: The factory is now keeping all new employees attendance records from the date of hire. The factory will send 5 complete sets of new employee records, showing their applications, contracts, and for Oct. attendance record, time cards and salary sheets by 11/15/2005.	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. The factory submitted records showing the immediate recording of new employee's attendance, time cards and salary sheets, Dec. 05.	Records kept in factor files.		
Based on local laws concerning leave, the factory shall immediately start following local law and giving the employees the legally required leaves as stated for annual leave, festival leave, casual and sick leave and maternity leave. Management shall revise the employee handbook to state the above policies and send Top of the World/Outdoor Cap a copy of the revised handbook in the local language and in English by November 1, 2005.	11/1/2005 & 11/15/2005	The factory has already started to give sick leave and maternity leave. They shall immediately start following local law and giving the employees the legally required leaves as stated above for annual leave, festival leave and casual leave. The factory will send a copy of the revised handbook by 11/1/2005.	The factory has established a log for leave and maternity leave. Factory provided copies of paperwork.	Copies of log kept in factory files.		
According to the Factories Act, 1965, Sections 51 & 53, where overtime is paid, no adult worker is allowed to work more than 60 hours per week or 56 per week on an average in a year. According to local law, a worker is expected to work up to 60 hours a week (8 hours normal shift + 2 hours overtime/day x 6 days/week = 60 hours). The factory must comply with local law and our code of conduct concerning hours of work. Send Top of the World/Outdoor Cap 10 employee's time cards, attendance records, salary sheets for the month of October 2005 by November 15, 2005.	11/15/2005	Factory Response: The factory is trying to follow our local law. The factory will send 10 employee time cards, attendance records, salary sheets for October by 11/15/05.	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. The factory submitted time cards, attendance records, salary sheets in Dec. 05, showing that are giving workers the appropriate time off. The factory is still working OT weekly about 6 hours over. TOW/ODC will continue to work with factory to get their OT in legal limits.	Records kept in factory files.		
All overtime should be voluntary and a sign up sheet should be posted for all overtime work. The factory will update its worker handbook to reflect this policy and start it by October 1, 2005. Send Top of the World/Outdoor Cap a copy of the revised handbook and a sign up sheet from October by November 15, 2005.	11/15/2005	Factory Response: The factory is now maintaining a sign up sheet to prove all overtime is voluntary. Besides this, the factory informs workers every day for their OT hours before starting their OT. The factory will send a copy of the revised handbook and a sign up sheet for Oct. by 11/15/05.	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. The factory provided copies of voluntary OT sign up sheets. TOW found no evidence of forced OT through interviews during the follow-up audit. Outdoor Cap to check on Feb. 06 visit.	Records kept in factory files.	Factory provided voluntary OT sign up sheets for ODC to review.	
Employers shall be able to provide explanation for all periods when the extraordinary business circumstances exception has been used. Employers shall take reasonable steps to inform workers about the nature and expected duration of the circumstances. The factory shall immediately start documenting all overtime hours worked and why. This register shall be kept at all times and be available to any inspector as required. Please send Top of the World/Outdoor Cap a copy of this register for the month of October 2005 by November 15, 2005.	11/15/2005	Factory Response: The factory shall immediately start documenting all overtime hours worked and why. The factory will send a copy of this register for October by 11/15/05.	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. Outdoor Cap to check on February Visit 06.		Factory provided voluntary OT sign up sheets for ODC to review.	
Employers shall be able to provide explanation for all periods when the extraordinary business circumstances exception has been used. Employers shall take reasonable steps to inform workers about the nature and expected duration of the circumstances. The factory shall immediately start documenting all overtime hours worked and why. This register shall be kept at all times and be available to any inspector as required. Please send Top of the World/Outdoor Cap a copy of this register for the month of October 2005 by November 15, 2005.	11/15/2005	Factory Response: The factory shall immediately start documenting all overtime hours worked and why. The factory will send a copy of this register for October by 11/15/05.	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. Outdoor Cap to check on February Visit 06.		Factory provided voluntary OT sign up sheets for ODC to review.	
The factory shall immediately comply with local law and not allow women to work past 8pm and not before 7 am. Send Top of the World/Outdoor Cap 10 women employee salary records, including timecards, attendance records, and salary sheets for the month of October 2005, by November 15, 2005 as evidence this has been corrected.	11/15/2005	Factory Response: The factory is trying not to allow women to work past 8pm. The factory will send 10 women's employee salary records, time cards and attendance records for Oct. by 11/15/05.	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. TOW found not evidence of women work carried out more than legal limit through interviews during follow-up audit in Dec. 05.			

Remediation				Updates (Cite Date of Follow up)		
PC Remediation plan	Target Completion Date	Factory Response (Optional)	Company follow up (Cite date of follow up)	Documentation	Company Follow up	Documentation
All overtime should be voluntary and a sign up sheet should be posted for all overtime work. The factory will update its worker handbook to reflect this policy and start it by October 1, 2005. Send Top of the World/Outdoor Cap a copy of the revised handbook and a sign up sheet from October by November 15, 2005.	11/15/2005	Factory Response: The factory is now maintaining a sign up sheet to prove all overtime is voluntary. Besides this, the factory informs workers every day for their OT hours before starting their OT. The factory will send a copy of the revised handbook and a sign up sheet for Oct. by 11/15/05.	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. The factory provided copies of voluntary OT sign up sheets. TOW found no evidence of forced OT through interviews during the follow-up audit. Outdoor Cap to check on Feb. 06 visit.	Records kept in factory files.		
Employees will be paid for all hours worked in a workweek. Calculation of hours worked must include all time that the employer allows or requires the worker to work. The factory shall immediately start using time cards for all record of time worked until the thumb reader electronic system is in place and operating correctly, so the supervisors will not have control of any documents that can be manipulated. Please send Top of the World/Outdoor Cap copies of time cards for 10 employees for the month of October 2005, by November 15th.	11/15/2005	Factory Response: The factory is using time cards for all records of time worked until the thumb reader electronic system is in place and operating correctly. The factory will send 10 time cards for Oct. by 11/15/05.	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. The factory has installed and is currently using the finger print time recording system. TOW/ODC are monitoring this and will receive records from the system. ODC to check on Feb. 06 visit.		ODC to get records from newly installed thumb reader. Records received and factory has now changed from thumb reader to card swipe because of accuracy. ODC witnessed employees swiping cards.	
The factory shall starting in October 2005, provide a pay statement that will show the employees earned wages, regular and overtime pay and hours, any bonuses and all deductions taken from their pay. Send Top of the World/Outdoor Cap 10 employees pay statements, time cards, salary sheets and attendance records for the month of October 2005, by November 15, 2005.	11/15/2005	Factory Response: The factory is now providing a pay statement that will show the employee wages, regular and overtime pay and hours, any bonuses and all deductions taken from their pay. The factory will send 10 employees pay statements, time cards, salary sheets and attendance records for Oct. by 11/15/05.	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. Tow found no issues thru interviews with workers in Dec. 05. Outdoor Cap will check for pay statements showing employee wages, OT and attendance in Feb. 06 visit.			
The factory shall immediately have all new employees and migrated workers listed on all attendance records starting from the date of hire. Send Top of the World/Outdoor Cap 5 complete sets of new employee's & migrated workers records, showing their application, contract, and for the month of October 2005, their attendance records, time cards and salary sheets by November 15, 2005.	11/1/2005 & 11/15/2005	Factory Response: The factory now keeps all new employees and migrated workers listed on all attendance records starting from the date of hire. The factory shall send 5 complete sets of new employee's & migrated workers records, showing their application, contract, and for Oct. their attendance records, time cards and salary sheets by 11/15/05.	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. The factory submitted records showing the immediate recording of new employee's attendance, time cards and salary sheets, Dec. 05.	Records kept in factory files.		