<table>
<thead>
<tr>
<th>Area Name</th>
<th>Area Description</th>
<th>Facility Walkthrough</th>
<th>Corrected:</th>
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</thead>
<tbody>
<tr>
<td>6. Health and Safety</td>
<td>Employers must maintain proof of age documentation for all workers.</td>
<td>Factory has implemented control to verify age documentation for all workers.</td>
<td>Corrected:</td>
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<td>5. Nondiscrimination</td>
<td>Where chemicals being used, it is necessary to have Material Safety Data Sheets (MSDS) available.</td>
<td>Factory has posted proper PPE in all areas.</td>
<td>Corrected:</td>
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<tr>
<td>4. Child Labor</td>
<td>There are 2 designated exits in each building, with proper signage indicating use.</td>
<td>Factory has established new channel of communication with every employee.</td>
<td>Corrected:</td>
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<tr>
<td>ID Number</td>
<td>FLA Code/Compliance Issue</td>
<td>FLA Benchmark</td>
<td>FLA Follow Up</td>
<td>FLA Internal Follow-Up</td>
<td>FLA Final Follow-Up</td>
<td>FLA Closeout</td>
<td>FLA Closeout Date</td>
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<tr>
<td>001</td>
<td>Country Law/Legal Reference</td>
<td>Corrected: PC Remediation Plan</td>
<td>Employer will not dismiss, discipline, or otherwise demote or otherwise suffer loss of rights at work, demote or otherwise suffer loss of rights at work, demote or otherwise suffer loss of rights at work</td>
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<td>002</td>
<td>Legal Compliance for Holiday/Leave</td>
<td>FLA Code/Compliance Issue</td>
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<td>008</td>
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<td>FLA Closeout Status</td>
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<td>010</td>
<td>FLA Closeout Notes</td>
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</tbody>
</table>

**Union Harassment**

- Workers required to come on following Saturday and Sunday due to lack of material (threads, cut goods, etc).
- Accumulation of vacation is higher than 10 days.
- There is policy of collective vacation, where all employees are entitled to 30 days off on a sliding scale based on service:
  - 1 year in service, 15 days; 2 years service, 10 days; 2 years service, 15 days; 3 years service, 12 days; 4 years service, 10 days; 5 years service, 12 days
- Payments for holidays and leave as required by law.
- Workers will be paid for holidays and leave as required by law.
- Holiday pay required to be calculated as average earnings for regular days plus OT earned during the corresponding week. Average calculated was lower than actual earnings due to overtime pay being 200% over regular rate and must be obtained from average of preceding week. Art. 340:
  - If an employee is paid 200% over regular rate, the payment must be obtained from average of preceding week. Art. 340:
  - Employees are entitled to additional day off for a number of employees.

**Union Delegate Interviews and Some Union Affiliates Raised Complaints for Constant Union Harassment Allegedly Made by Most Line/Module Line Supervisor.

- HR Manager acknowledged having received no written evidence of this recommendation or any type of disciplinary action, even though personnel files. File contained letter of resignation.
- There is a known complaint against him.
- Line supervisor may have recommended the lay-off of [Employee name's] personnel files. File contained letter of resignation. [Employee name's] personnel files did not contain any written reason for being laid off, nor was there any type of disciplinary action, nor was there any type of written recommendation.

**Evidence of Animation**

- Factory management to secure overtime premium payments, special circumstances may be permitted by Ministry of Labor.
- Payments must be made to all workers during induction process, through PA system (radio show) and via posting (FOA policy is displayed).
- Union delegate interviews and some union affiliates raised complaints for constant union harassment allegedly made by most line/module line supervisor.
- Supervisors held 5 interviews and HR Manager, no relocation considered for [Employee name's] personnel files. File contained letter of resignation. [Employee name's] personnel files did not contain any written reason for being laid off, nor was there any type of disciplinary action, nor was there any type of written recommendation.
- There is a known complaint against him.
- Line supervisor may have recommended the lay-off of [Employee name's] personnel files. File contained letter of resignation. [Employee name's] personnel files did not contain any written reason for being laid off, nor was there any type of disciplinary action, nor was there any type of written recommendation.

**Union Manager Interviews**

- HR Manager acknowledged that workers required to make up time lost. Last occurrence took place Monday, July 10, 2006. Non-union employees did not raise any issues related to anti-union behavior. Supervisors held 5 interviews and HR Manager acknowledged having received no written evidence of this recommendation or any type of disciplinary action, even though personnel files. File contained letter of resignation.
- There is a known complaint against him.
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- Line supervisor may have recommended the lay-off of [Employee name's] personnel files. File contained letter of resignation. [Employee name's] personnel files did not contain any written reason for being laid off, nor was there any type of disciplinary action, nor was there any type of written recommendation.

**Monitor Review**

- Payroll records, payments of employee/employer interviews, review of company policy, payroll review, and HR Manager acknowledged having received no written evidence of this recommendation or any type of disciplinary action, even though personnel files. File contained letter of resignation.
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**Ongoing Remediation**

- Ongoing is registered. Assistance is registered. Workers received special training on proper way to relate to women.
- HR Manager acknowledged having received no written evidence of this recommendation or any type of disciplinary action, even though personnel files. File contained letter of resignation.
- There is a known complaint against him.
- Line supervisor may have recommended the lay-off of [Employee name's] personnel files. File contained letter of resignation. [Employee name's] personnel files did not contain any written reason for being laid off, nor was there any type of disciplinary action, nor was there any type of written recommendation.

**Fla Benchmark**

- Ongoing,
- Ongoing,
- Ongoing,
- Ongoing,
### FLA Code/Compliance Issue

#### FLA Code/Compliance Issue:
- Art. 330: Overtime hours must be paid at a rate at least equal to 125% of regular compensation.
- Art 333 (Overtime): Overtime is authorized under following conditions:
  - same employee cannot work overtime in 7 days prior to holidays.
  - At least 1 day off in every 7 day period.
  - Limits on regular and overtime hours allowed by the law of the country of manufacture.

#### FLA Benchmark:
- FLA Benchmark Timeline:
  - Overtime: Implementation.
  - 12/15/06:
    - Overtime: Implement staff training.
    - 11/24/06:
      - Overtime: Implement attendance records.
  - 11/24/06:
    - Overtime: Implement attendance records.
  - 1/24/06:
    - Overtime: Implement timekeeping system.

### Documentation

#### Documentation:
- Documentation: Overtime records.
- Documentation: Employee interviews.
- Documentation: Payroll record review.
- Documentation: Attendance records.

### Noncompliance

#### Noncompliance:
- Noncompliance: Overtime compensation.
- Noncompliance: Overtime hours tracked.

### PC Remediation Plan

#### PC Remediation Plan:
- PC Remediation Plan:
  - Overtime: implement timekeeping system.
  - Overtime: implement attendance records.
  - Overtime: implement staff training.

### Risk of Noncompliance

#### Risk of Noncompliance:
- Risk of Noncompliance:
  - Overtime: unreported overtime.
  - Overtime: undercompensation.

### Sources/Documentation Used For

#### Sources/Documentation Used For:
- Sources/Documentation Used For:
  - Employees interviews.
  - Payroll review.
  - Attendance records.

### Evidence of

#### Evidence of:
- Evidence of:
  - Overtime compensation.
  - Overtime hours tracked.

### FLA Code/Compliance Issue

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### Compliance

#### Compliance:
- Compliance: Overtime: implemented.
- Compliance: Overtime: records implemented.
- Compliance: Overtime: compensation implemented.

### Risk of Noncompliance

#### Risk of Noncompliance:
- Risk of Noncompliance:
  - Overtime: unreported overtime.
  - Overtime: undercompensation.