For an explanation on how to read this report, please visit the FLA website [here](#).
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*Denotes a notable feature
Forced Labor: Forced Overtime

F.14 The imposition of mandatory overtime beyond the limits set by the law, a freely negotiated collective bargaining agreement, and/or the FLA Code, in an environment where a worker is unable to leave the work premises, constitutes forced labor. (S)

Noncompliance

Explanation: Although there is not much OT performed and regular plus OT hours do not surpass the 60 hours limit, as per company policy, overtime is expected to be performed when there are company needs. Management interview and policy review.

Plan Of Action: [Factory name] is not subject to a limitation by law; however, company procedures do not allow employees to work over 60 hours per week. If an employee is scheduled to work (including any overtime hours) they are expected to be at work unless otherwise excused. If they do not get the absence excused then it can count against their attendance record. [Factory name] does not intend to take any further action on this or change our policy at this time.

Deadline Date: 03/06/2009

Action Taken: No

Plan Complete: No

Plan Complete Date:
Harassment or Abuse: Discipline/Verbal Abuse

H&A.11 Employers shall not use any form of verbal violence, including screaming, yelling, or the use of threatening, demeaning, or insulting language, as a means to maintain labor discipline. (S)

Uncorroborated Evidence of Noncompliance

Explanation: Two workers said they have received threatening statements from supervisor, “Work overtime or we may have to let you go. This is my policy.” Supervisor does not have any historical disciplinary actions taken against him. Other employees interviewed did not feel the same way about this supervisor. Monitor mentioned this during the closing. Auditor could not corroborate this.

Plan Of Action: [Factory name] does not permit any form of harassment in its workplace by any employee. Our company policy on this type of behavior is clear and employees are encouraged to report any form of harassment to a senior manager or Human Resources. They also have the option to contact our third-party HR services company, [company name], on a completely confidential basis. Action plan going forward is to continue to communicate the company’s Complaint Resolution Procedure as listed in the EE Handbook on page 28.

Deadline Date: 03/06/2009

Action Taken: No

Plan Complete: No

Plan Complete Date:
Child Labor: Other - Child Labor

Other

Noncompliance

Explanation: Facility does not have written procedures for age verification. It is the monitor's impression that the facility did not create a written age verification process because this is not required by local (federal or state) regulations.

Plan Of Action: [Factory name] will formally implement the [HR company name] Employment Policy regarding Hiring Minor Employees. The policy was revised on May 1, 2008 and is available for HR professionals at [factory name] to review. [HR company name] monitors our hiring practices in regards to the ages of all employees by verifying the I-9 documentation completed at the onset of the hiring process. [HR company name] does not permit the employment of employees under the age of 16 unless it is a very specific circumstance.

Deadline Date: 03/06/2009

Action Taken: No

Plan Complete: No

Plan Complete Date: 
Non-Discrimination: Employment Decisions

D.2 All employment decisions shall be made solely on the basis of a person’s qualifications, in terms of education, training, experience, demonstrated skills and/or abilities, as they relate to the inherent requirements of a particular job. (P)

Uncorroborated Evidence of Noncompliance

Explanation: Two workers alleged that the manager's son was given special treatment. Monitor reviewed personnel file and found this worker has been with the facility for many years and has been promoted on several occasions; yet, the facility did not have any written evidence to prove why he was promoted instead of other workers. As of this year, facility has changed procedures and has now started to keep records of all activities within the facility. The promotion happened prior to this change.

Plan Of Action: No new remedial actions. [Factory name] has implemented an interview procedure that includes a panel review. No hiring or promotion activity is authorized without panel review and HR approval at the corporate level.

Deadline Date: 03/06/2009

Action Taken: No

Plan Complete: No

Plan Complete Date: 
Code Awareness:
GEN.2 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.

Noncompliance

Explanation: Workers are not informed of the code at the time of induction and on an ongoing basis.

Plan Of Action: [Factory name] will include the code in the published Employee Handbook. All employees receive this and sign off in receipt. The handbook is reviewed with all new hires during the orientation process. At that time Human Resources will specifically cover the code of conduct and relationship with FLA. [Factory name] will also plan to communicate the code to their current employees on a quarterly basis during the daily shift communication process. Human Resources will attend the meeting and present the information; in HR’s absence, a "script" will be provided to the supervisors to ensure that the information is covered in detail.

Deadline Date: 03/06/2009

Action Taken: No

Plan Complete: No

Plan Complete Date:
Health and Safety: Evacuation Requirements and Procedure

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

Noncompliance

Explanation: 1. In the case of at least 2 fire hoses that have been removed, facility has not removed the sign that identifies the presence of a fire hose.

2. Facility should paint pedestrian lines where necessary to avoid workers being hit by small trucks circulating around the factory.

Plan Of Action: Signage referencing the 2 fires hoses has been removed. The Safety Committee is reviewing the possibility for repainting or painting red lines where necessary.

Deadline Date: 04/10/2009

Action Taken: No

Plan Complete: No

Plan Complete Date: 
Health and Safety: Other - Health and Safety

Other

Notable Feature

Explanation: Facility has a very extensive safety program. Every month there are different types of trainings conducted. During the month of August the following trainings took place:

1. Safety Training - Ergonomics/Back Safety: 116 employees received this training.
2. Safety Training - Lock-Out/Tag-Out: 106 employees received this training.
3. Safety Training - Emergency Action Plan: 102 employees received this training.
4. Safety Training - Fire Extinguisher Training 131 employees received this training.
5. Safety Training - Electrical Training 115 employees received this training.

Plan Of Action:

Deadline Date:

Action Taken:

Plan Complete: No

Plan Complete Date: