COMPANY: Club Colors
COUNTRY: United States
FACTORY CODE: 940082447H
MONITOR: Accordia Global Compliance Group
AUDIT DATE: November 17, 2009
PRODUCTS: T-Shirts, Jackets, Pants
PROCESSSES: Embroidery, Screen Printing
NUMBER OF WORKERS: 34

For an explanation on how to read this report, please visit the FLA website [here](#).
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Forced Labor: Employment Records

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

Noncompliance

Explanation: Facility does not maintain sufficient hiring and employment records to demonstrate and verify compliance with this Code provision. I-9 forms are missing. (US Citizenship & Immigration Services Employment Eligibility Verification)

Plan Of Action: Factory informed us they maintain their employment records, including the I-9s, at a separate location. The company in charge of their records is one of the world's largest providers of HR and payroll services. This off-site company notifies the factory of any discrepancies with employee paperwork. In the event of any discrepancies, the factory investigates and resolves any issues.

Deadline Date:

Action Taken:

Plan Complete:

Plan Complete Date:
Freedom of Association: Grievance Procedure

FOA.26 Employer shall have in place written grievance procedures that allow first an attempt to settle grievances directly between the worker and the immediate supervisor but that, where this is inappropriate or has failed, it is possible for the worker to have the grievance considered at one or more steps, depending on the nature of the grievance and the structure and size of the enterprise. Employers shall ensure that the grievance procedures and applicable rules are known to workers. (P)

Noncompliance

Explanation: Facility does not have a written grievance procedure which would allow an employee to directly settle grievances with their immediate supervisor. If this direct approach is inappropriate or has failed, it is possible for the worker to have the grievance reconsidered. This depends on the nature of the grievance and the structure and size of the enterprise.

Plan Of Action: The factory currently has a grievance policy within its employee handbook. This handbook is given to each employee when they begin working at the factory. The factory staff shared their handbook with the company. The factory plans to incorporate their grievance policy into written procedures. They plan on holding an employee meeting to go over the revised policy with employees.

Deadline Date: 05/03/2010

Action Taken:

Plan Complete:

Plan Complete Date:
Harassment or Abuse: Discipline/Review of Disciplinary Action

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

Noncompliance

Explanation: The current Conduct Standards and Discipline do not provide workers with an opportunity to reply, challenge or make appeals against the actions taken.

Plan Of Action: The factory currently has a grievance policy within its employee handbook. This handbook is given to each employee when they begin working at the factory. The factory staff shared their handbook with the company. The factory plans to incorporate their grievance policy into written procedures. They plan on holding an employee meeting to go over the revised policy with employees.

Deadline Date: 02/09/2010

Supplier CAP: 03/01/2010

Action Taken: Plan Complete: 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: Company has not communicated a Code of Conduct to facility (management nor workers).

Plan Of Action: The factory currently has a grievance policy within its employee handbook. This handbook is given to each employee when they begin working at the factory. The factory staff shared their handbook with the company. The factory plans to incorporate their grievance policy into written procedures. They plan on holding an employee meeting to go over the revised policy with employees.

Deadline Date: 02/09/2010

Supplier CAP: 03/01/2010

Action Taken:

Plan Complete:

Plan Complete Date:
Health and Safety: General Compliance Health and Safety

H&S.1 Employers shall comply with all local laws, regulations and procedures concerning health and safety.

Noncompliance

Explanation:

1. Fire extinguishers are not inspected on a monthly basis to check for operability. OSHA Fire Fighting (29CFR 1910.157) Portable Fire Extinguishers

2. No formal or acceptable training program to teach workers on the safe use of industrial trucks (classroom and road test are mandatory). OSHA Powered Industrial Truck (29CFR 1910.178)

3. No OSHA 300 Log found at facility. OSHA Safety and Accident reports. (29CFR 1904.7)

4. No eye wash station found within the proximity of the screen cleaning area. OSHA Medical Services and First Aid (29CFR 1910.151)

5. Electrical panels along the back wall of production area lack a minimum 36”-frontal clearance, in a width equal to the width of the panels. OSHA Electrical (29CFR1910.303)

Plan Of Action:

1. Factory has 22 fire extinguishers on premise that are inspected once yearly by a private company. City requirements mandate that they are inspected once a year; therefore, they are in compliance. Local fire district comes twice a year for training on use of fire extinguishers.

2. Each person designated to operate the forklift is trained and certified.

3. Factory has not had any accidents to report and therefore did not fill out the form. [Company name] suggested that they fill out the dates on the form for compliance.

4. Factory purchased an eye wash station within the last week. They plan on installing it within the next week.

5. Factory showed us the electrical panels. City inspector approved the panels’ location when building was built. City also approved adjacent machinery location at time it was installed. There are strict codes in this building area due to proximity to the airport.

Deadline Date: 02/09/2010

Supplier CAP:
Supplier CAP 03/01/2010

Action Taken:

Plan Complete:

Plan Complete Date:

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Health and Safety: Health and Safety Management System

H&S.5 The health and safety policy shall contain the framework for a comprehensive health and safety management system within which employers' responsibilities and workers' rights and duties, various responsibilities of designated personnel, procedures that enable workers to raise health and safety concerns and procedures for reporting death, injury, illness and other health and safety issues (for instance, near-miss accidents) are clear and regularly tested and reviewed. (P)

Noncompliance

Explanation: Facility does not have a H&S policy containing the framework for a comprehensive HS& management system within which employers' responsibilities and workers' rights and duties, various responsibilities of designated personnel, procedures that enable workers to raise H&S concerns and procedures for reporting death, injury, illness and other H&S issues (for instance, near-miss accidents) are clear, regularly tested and reviewed.

Plan Of Action: Factory currently has H&S management policy within employee handbook. Handbook is given to each employee upon hire. Factory plans to incorporate their grievance policy into written procedures. They plan on holding an employee meeting to go over revised policy with employees.

Deadline Date: 02/09/2010
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. Facility does not have an evacuation plan (written procedure explaining exit markings, signs, emergency lighting locations, and details on what to do in event of an emergency and what persons have what responsibilities).

2. Evacuation plan maps are not visibly posted within the facility.

3. Workers have not been trained in evacuation procedures.

4. Evacuation drills are not performed at the facility.

Evacuation Requirements and Procedure - OSHA Evacuation (29CFR 1910.38)

Plan Of Action: Factory plans to sign into their OSHA account online and create a written evacuation plan. Factory will create a map of exits and post this map accordingly. After these are written, factory will have a training session with all employees. Alarm systems are tested on a regular basis.

Deadline Date: 02/09/2010

Supplier CAP: 03/01/2010

Action Taken:

Plan Complete:
Health and Safety: Chemical Management and Training

H&S.13 All chemicals and hazardous substances shall be properly labeled and stored in accordance with applicable laws. Labels shall be placed in the local language and the language(s) spoken by workers, if different from the local language. Workers shall receive training, appropriate to their job responsibilities, concerning the hazards, risks and the safe use of chemicals and other hazardous substances. (S)

Noncompliance

Explanation: Workers do not receive training that is appropriate to their job responsibilities. These training sessions do not cover hazards, risks and safe usage of chemicals and other hazardous substances.

OSHA Hazardous Communication Program (29CFR 1910.1200)

Plan Of Action: Factory currently explains the proper use of materials and equipment safety upon hire. The inks that the factory uses are not hazardous chemicals. They use soy-based inks. The cleaners they use are mineral spirits. They do use hydrogen peroxide and the bottle contains a hazardous warning on it. All the machines have safety cords that will immediately shut off the machine should anyone go near the working parts. [Factory name] demonstrated how this worked.

Deadline Date: 02/09/2010

Action Taken:

Plan Complete:

Plan Complete Date: