

Member(s)

KMD Brands

11/15/2016

Country

China

Date of Inspection

Additional CAP Notes

**FLA Assessment Corrective Action Plan** 

Summary of Corrective Actions Taken or Planned

Benchmark ID	Benchmark details	Question(s)	Finding details	Recommendation for Immediate Action	Recommendation for Sustainable Improvement	Company Plan of Action	Company deadline (MM-DD-YYYY)	Action Taken	Company Progress Status
XX.1	Please refer to the assessment report for benchmark information. For assessments conducted prior to 2020 benchmark numbers refl the FLA's 2011 Workplar Compliance Benchmarks	ce	The worker integration component is missing across all Employment Functions. This indicates that the factory has no established procedures to request and/or receive workers' input and feedback regarding the creation implementation and updating of its policies and procedures. Workers are neithe systematically integrated nor consulted in decision-making processes.	ot d		Established procedures to request and/or receive workers' input and feedback regarding the creation implementation and updating of policies and procedures. Systematically integrate and consult workers in decision-making processes. Please also provide training to all workers on the updated policy and procedure.	i	training content and records provided.	Completed
C.6	All wages including payment for overtime shive paid directly and in fur within legally defined tim limits. When no time limit are defined by law compensation shall be pat least once a month.	II e ts	1. The factory was unable to provide proof of social insurance payments in the past 12 months for assessors to review. However in a review of social insurance application forms and participants list from October 2015 to November 2016 in addition to interviews with workers it was found that a 182 eligible workers were provided with all five types of mandatory social insurance in November 2016: work-related injury maternity pension unemployment and medical insurance. The factory does not provide any commercial accidental insurance for all threworkers over retirement age (and therefore ineligible to make social insurance contributions) as required by the FLA.  2. The contribution base of the five types of social insurances is not in line with legal requirements. The contribution should be based or a worker's average monthly wage of the previous year which for the factory averages between CNY 4300 and CNY 4900 per month (USD 644 to USD 734). However the factory only contributes to the five types of social insurances based on the legal requirements.	I workers with government- mandated insurance as well as  commercial work-related injury  insurance for workers ineligible  for social insurance. Base  contributions for social  insurance on workers' actual  wages.  Il 2. Provide or pay  out unused annual leave to  resigned workers.  3. Enhance training and  worker communication on the  sick leave policy so that worker  are aware of their benefits.	S	As above explore ways the factory build payments into the Housing Provident Fund as part of the pay structure.     Ernoll all workers into the legally required Housing Provident Fund before the end of 2017.	02-10-2017	factory stated: ""Housing provident fund is not within the obligatory insurance in factory loacted area. Seaking possible margin and dis. with workers to make it happen.???????????????????????????????????	

payme be pai within limits. are de comp	aid directly and in full I legally defined time S. When no time limits defined by law pensation shall be paid ast once a month.	1. The factory was 1. Provide all unable to provide proof of social insurance payments in the past 12 months for assessors to eview. However in a review of social insurance application orms and participants list from Cotober 2015 to November 2016 in addition to interviews with workers it was found that all 2. Provide all workers with government-manded work-related injury insurance for workers ineligible for social insurance. Base contributions for social insurance on workers' actual wages.	Determine how many workers 02-10-2017 do not have government-mandated insurance as well as commercial work-related injury insurance for workers ineligible for social insurance.     Make a plan to provide all workers with government-	receipt of social insurance Completed provided
be pai within limits. are de comp	aid directly and in full i n legally defined time s. When no time limits defined by law pensation shall be paid ast once a month.	nsurance payments in the past 12 months for assessors to eview. However in a review of oscial insurance application orms and participants list from 2016 in addition to interviews 2016 in addition to interviews and participants list from 2016 in addition to interviews 2016 in addition 2016 in addition to interviews 2016 in addition to inter	mandated insurance as well as commercial work-related injury insurance for workers ineligible for social insurance.  2. Make a plan to provide all workers with government-	provided
within limits. are de comp	n legally defined time s	12 months for assessors to commercial work-related injury events. However in a review of social insurance application forms and participants list from corbor 2015 to November 2016 in addition to interviews expenses.	commercial work-related injury insurance for workers ineligible for social insurance.  2. Make a plan to provide all workers with government-	
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are de compe	defined by law spensation shall be paid flast once a month.	social insurance application for social insurance. Base contributions for social october 2015 to November insurance on workers' actual wages.	for social insurance.  2. Make a plan to provide all workers with government-	
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compe	pensation shall be paid flast once a month.	orms and participants list from contributions for social cotober 2015 to November insurance on workers' actual vages.	Make a plan to provide all workers with government-	
	ast once a month. (	October 2015 to November insurance on workers' actual wages.	workers with government-	
	2	2016 in addition to interviews wages.		
	, F		mandated insurance as well as	
	·		commercial work-related injury	
	ŗ	182 eligible workers were out unused annual leave to	insurance for workers ineligible	
	F		for social insurance by the end	
		provided with all five types of resigned workers.		
		nandatory social insurance in 3. Enhance training and	of 2017.	
		November 2016: work-related worker communication on the	Base contributions for social	
		njury maternity pension sick leave policy so that workers	insurance on workers' actual	
		unemployment and medical are aware of their benefits.	wages.	
		nsurance. The factory does not		
	,	provide any commercial		
		accidental insurance for all three		
		vorkers over retirement age		
		and therefore ineligible to make		
		social insurance contributions)		
		as required by the FLA.		
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		pase of the five types of social		
		nsurances is not in line with		
		egal requirements. The		
		contribution should be based on		
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	<b>\</b>	vage of the previous year which		
	f	or the factory averages		
	t	petween CNY 4300 and CNY		
1		1900 per month (USD 644 to		
		JSD 734). However the factory		
I		only contributes to the five types		
1		of social insurances based on		
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	ages including 5	he local minimum contribution.  1. The factory was 1. Provide all	Explore ways the factory can 02-10-2017	factory stated: ""Current Completed
paym <sup>,</sup>	nent for overtime shall	ınable to provide proof of social workers with government-	increase social insurance	social insurance
be pa	aid directly and in full i	nsurance payments in the past mandated insurance as well as	contributions based on a	contribution conform to
within	n legally defined time	12 months for assessors to commercial work-related injury	worker's average monthly wage	local insurance
		eview. However in a review of insurance for workers ineligible	of the previous year.	requirement and kept
		social insurance application for social insurance. Base	2. Build this into the factory pay	trying to upgrading the
		forms and participants list from contributions for social	structure before the end of	insurance base. Do
	ast once a month.	October 2015 to November insurance on workers' actual	2017.	annualy review of the
at leas			2017.	insurance base.
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I		with workers it was found that all 2. Provide or pay		
1		182 eligible workers were out unused annual leave to		?????????????????
		provided with all five types of resigned workers.		?????????????????
		mandatory social insurance in 3. Enhance training and		??????????""
		November 2016: work-related worker communication on the		
		njury maternity pension sick leave policy so that workers		
	l	unemployment and medical are aware of their benefits.		
	i	nsurance. The factory does not		
	r	provide any commercial		
		accidental insurance for all three		
		vorkers over retirement age		
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		and therefore meligible to make social insurance contributions)		
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	6	as required by the FLA.		
		2. The contribution		
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		1900 per month (USD 644 to		
		JSD 734). However the factory		
		only contributes to the five types		
		of social insurances based on		
	t	ne local minimum contribution		

C.6	All wages including 6	The factory was     Provide all	1. Provide or pay out unused 02-10-2017	photos of annual leave Completed
	payment for overtime shall	unable to provide proof of social workers with government-	annual leave to resigned	policy provided and factory
	be paid directly and in full	insurance payments in the past mandated insurance as well as	workers.	stated: ""Creat
	within legally defined time	12 months for assessors to commercial work-related injury	Establish a system so that	supplementary terms of
	limits. When no time limits	review. However in a review of insurance for workers ineligible	when workers resign the factory	annual leave regulations
	are defined by law	social insurance application for social insurance. Base	pays them at the time for any	stating clearly that workers
	compensation shall be paid	forms and participants list from contributions for social	and all unused annual leave.	will be paid with the last
	at least once a month.	October 2015 to November insurance on workers' actual		month wages for unused
		2016 in addition to interviews wages.		annual leave when
		with workers it was found that all 2. Provide or pay		resigned. The
		182 eligible workers were out unused annual leave to		supplementary terms
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		mandatory social insurance in 3. Enhance training and		board and broasted in
		November 2016: work-related worker communication on the		work
		injury maternity pension sick leave policy so that workers		place.1.????2016.11.14??
		unemployment and medical are aware of their benefits.		7????????????????
		insurance. The factory does not		????????????????
		provide any commercial		??;2.?????????????
		accidental insurance for all three		????????????""
		workers over retirement age		
		(and therefore ineligible to make		
		social insurance contributions)		
		as required by the FLA.		
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		base of the five types of social		
		insurances is not in line with		
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		contribution should be based on		
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		4900 per month (USD 644 to		
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		only contributes to the five types		
		of social insurances based on		
		the local minimum contribution		
C.6	All wages including 7	The factory was 1. Provide all	3. Enhance training and worker 02-10-2017	factory stated: ""1. Factory Completed
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	be paid directly and in full	unable to provide proof of social workers with government- insurance payments in the past mandated insurance as well as	communication on the sick leave policy so that workers are	sick leave policy. 2.
	be paid directly and in full within legally defined time	unable to provide proof of social workers with government- insurance payments in the past mandated insurance as well as 12 months for assessors to commercial work-related injury	communication on the sick	sick leave policy. 2. Include the related policy
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	be paid directly and in full within legally defined time limits. When no time limits are defined by law compensation shall be paid	unable to provide proof of social insurance payments in the past 12 months for assessors to review. However in a review of social insurance application forms and participants list from October 2015 to November 2016 in addition to interviews with workers it was found that all 182 eligible workers were provided with all five types of mandatory social insurance in November 2016: work-related injury maternity pension unemployment and medical insurance. The factory does not provide any commercial accidental insurance for all three workers over retirement age (and therefore ineligible to make social insurances contributions) as required by the FLA.  2. The contribution base of the five types of social insurances on worker's actual wages.  2. Provide or pay out unused annual leave to resigned workers.  3. Enhance training and worker communication on the side leave policy so that workers are aware of their benefits.	communication on the sick leave policy so that workers are	sick leave policy. 2. Include the related policy in the induction training 3. Announce the leagal benefits to workers. 1.???????????????????????????????????
	be paid directly and in full within legally defined time limits. When no time limits are defined by law compensation shall be paid	unable to provide proof of social insurance payments in the past 12 months for assessors to review. However in a review of social insurance application forms and participants list from October 2015 to November 2016 in addition to interviews with workers it was found that all 182 eligible workers were provided with all five types of mandatory social insurance in November 2016: work-related injury maternity pension unemployment and medical insurance. The factory does not provide any commercial accidental insurance for all three workers over retirement age (and therefore ineligible to make social insurances is not in line with legal requirements. The contribution should be based on	communication on the sick leave policy so that workers are	sick leave policy. 2. Include the related policy in the induction training 3. Announce the leagal benefits to workers. 1.???????????????????????????????????
	be paid directly and in full within legally defined time limits. When no time limits are defined by law compensation shall be paid	unable to provide proof of social insurance payments in the past 12 months for assessors to review. However in a review of social insurance application forms and participants list from October 2015 to November 2016 in addition to interviews with workers it was found that all 182 eligible workers were provided with all five types of mandatory social insurance in November 2016: work-related injury maternity pension unemployment and medical insurance. The factory does not provide any commercial accidental insurance for all three workers over retirement age (and therefore ineligible to make social insurance contributions) as required by the FLA.  2. The contribution base of the five types of social insurances is not in line with legal requirements. The contribution should be based on a worker's average monthly wage of the previous year which	communication on the sick leave policy so that workers are	sick leave policy. 2. Include the related policy in the induction training 3. Announce the leagal benefits to workers. 1.???????????????????????????????????
	be paid directly and in full within legally defined time limits. When no time limits are defined by law compensation shall be paid	unable to provide proof of social insurance payments in the past 12 months for assessors to review. However in a review of social insurance application forms and participants list from October 2015 to November 2016 in addition to interviews with workers it was found that all 182 eligible workers were provided with all five types of mandatory social insurance in November 2016: work-related injury maternity pension unemployment and medical insurance. The factory does not provide any commercial accidental insurance for all three workers over retirement age (and therefore ineligible to make social insurance contributions) as required by the FLA.  2. The contribution base of the five types of social insurances is not in line with legal requirements. The contributions hould be based on a worker's average monthly wage of the previous year which for the factory averages	communication on the sick leave policy so that workers are	sick leave policy. 2. Include the related policy in the induction training 3. Announce the leagal benefits to workers. 1.???????????????????????????????????
	be paid directly and in full within legally defined time limits. When no time limits are defined by law compensation shall be paid	unable to provide proof of social insurance payments in the past 12 months for assessors to review. However in a review of social insurance application forms and participants list from October 2015 to November 2016 in addition to interviews with workers it was found that all 182 eligible workers were provided with all five types of mandatory social insurance in November 2016: work-related injury maternity pension unemployment and medical insurance. The factory does not provide any commercial accidental insurance for all three workers over retirement age (and therefore ineligible to make social insurance contributions) as required by the FLA.  2. The contribution base of the five types of social insurances is not in line with legal requirements. The contribution should be based on a worker's average monthly wage of the previous year which for the factory averages between CNY 4300 and CNY 4990 per month (USD 644 to	communication on the sick leave policy so that workers are	sick leave policy. 2. Include the related policy in the induction training 3. Announce the leagal benefits to workers. 1.???????????????????????????????????
	be paid directly and in full within legally defined time limits. When no time limits are defined by law compensation shall be paid	unable to provide proof of social insurance payments in the past 12 months for assessors to review. However in a review of social insurance application forms and participants list from October 2015 to November 2016 in addition to interviews with workers it was found that all 182 eligible workers were provided with all five types of mandatory social insurance in November 2016: work-related injury maternity pension unemployment and medical insurance. The factory does not provide any commercial accidental insurance for all three workers over retirement age (and therefore ineligible to make social insurance contributions) as required by the FLA.  2. The contribution base of the five types of social insurances is not in line with legal requirements. The contribution should be based on a worker's average monthly wage of the previous year which for the factory averages between CNY 4300 and CNY 4900 per month (USD 644 to USD 734). However the factory	communication on the sick leave policy so that workers are	sick leave policy. 2. Include the related policy in the induction training 3. Announce the leagal benefits to workers. 1.???????????????????????????????????
	be paid directly and in full within legally defined time limits. When no time limits are defined by law compensation shall be paid	unable to provide proof of social insurance payments in the past 12 months for assessors to review. However in a review of social insurance application forms and participants list from October 2015 to November 2016 in addition to interviews with workers it was found that all 182 eligible workers were provided with all five types of mandatory social insurance in November 2016: work-related injury maternity pension unemployment and medical insurance. The factory does not provide any commercial accidental insurance contributions) as required by the FLA.  2. The contribution base of the five types of social insurances is not in line with legal requirements. The contribution should be based on a worker's average between CNY 4300 and CNY 4900 per month (USD 644 to USD 734). However the factory only contributes to the five types	communication on the sick leave policy so that workers are	sick leave policy. 2. Include the related policy in the induction training 3. Announce the leagal benefits to workers. 1.???????????????????????????????????
	be paid directly and in full within legally defined time limits. When no time limits are defined by law compensation shall be paid	unable to provide proof of social insurance payments in the past 12 months for assessors to review. However in a review of social insurance application forms and participants list from October 2015 to November 2016 in addition to interviews with workers it was found that all 182 eligible workers were provided with all five types of mandatory social insurance in November 2016: work-related injury maternity pension unemployment and medical insurance. The factory does not provide any commercial accidental insurance for all three workers over retirement age (and therefore ineligible to make social insurance contributions) as required by the FLA.  2. The contribution base of the five types of social insurances is not in line with legal requirements. The contribution should be based on a worker's average monthly wage of the previous year which for the factory averages between CNY 4300 and CNY 4900 per month (USD 644 to USD 734). However the factory	communication on the sick leave policy so that workers are	sick leave policy. 2. Include the related policy in the induction training 3. Announce the leagal benefits to workers. 1.???????????????????????????????????

XX.3	Please refer to the assessment report for benchmark information. For assessments conducted prior to 2020 benchmark numbers reflect the FLA's 2011 Workplace Compliance Benchmarks.	not have the Environmental Protection Final Acceptance Check Report for their completed construction project. Additionally the factory has not updated its Environmental Impact Report and Approval to reflect the factory name change which occurred in June 2013. The related approval is still under the previous name and was issued by the local environmental protection department in October 2006. 2. The factory does not have any formal written policies or procedures on Environmental Protection. 3. The factory does not have any standard protection of energy and water efficiency or of energy and water efficiency or a commitment to minimize impacts with respect to air emissions waste hazardous materials and other applicable environmental risks. 4. The factory does	Create a formal written policy and procedures on Environmental Protection.	environmental policy Completed provided. Factory stated that ""Arrange environment protection training. Add in annual training plan.????????????????????????????????????
HOW.1.1	Employers shall comply 26 with all national laws regulations and procedures	not have a procedure to manage the factory's environmental impact to its surroundings nor does it identify whether its onsite operations generate any negative environmental impacts.  Therefore the factory is not making an affort to reduce its it was noted that the factory had environmental impacts.  Therefore the factory is not making an affort to reduce its it was noted that the factory had environmental impacts.  Therefore the factory is not making an affort to reduce its it was noted that the factory had environmental impacts.  Comprehensive Working Hour	Establish a plan to correctly	factory stated: ""Keep Completed working on decreasing the OT
	concerning hours of work public holidays and leave.	Working Hours System valid from April 18 2015 to April 17 2016. The total working hours for two sampled workers during this period were 2688 and 2706 hours both exceeding the written approval's limit of 2424 hours.  Due to inaccurate and inauthentic time record system found the actual working hours could not be verified.  Update: The factory obtained another written approval for adopting a Comprehensive Working Hours System valid from April 18 2016 to April 17 2017. The total working hours for the two sampled workers from April 18 2016 to November 14 2016 were within the written approval's limit of 2432 hours.	2. Identify those workers whose hours consistently exceed the working hour system. 3. Provide training to line supervisors to ensure that workers comply with start and end time of their shifts in keeping with factory policy and not exceeding working hour system. 4. Report back on how the factory has taken steps to proactively address the excessive hours worked within the factory by year end 2017.	time.????????????????????????????????????

XX.4	Diagon sofon to the	A The feet will be	O	and an analysis of the state of
XX.4	Please refer to the 9	The factory does	Create a procedure to manage 02-10-2017	environmental policy Completed
	assessment report for	not have the Environmental Protection Final Acceptance	the factory's environmental	provided. Factory stated
	benchmark information.	Check Report for their	impact to its surroundings and identify whether its on-site	that ""No harmful substance emission cause
	For assessments	completed construction project.	operations generate any	
	conducted prior to 2020 benchmark numbers reflect	Additionally the factory has not	operations generate any negative environmental impacts.	by production. Household disposal comply with rules
	the FLA's 2011 Workplace	updated its Environmental	riegative environmental impacts.  Train staff members responsible	disposal comply with rules
	Compliance Benchmarks.	Impact Report and Approval to	for environmental protection and	α regulations.??????????
	Compliance Benchmarks.	reflect the factory name change	for environmental protection and	??????????????????????????????????????
			have assigned HR or manager	
		which occurred in June 2013.	conduct periodic reviews.	????????????????
		The related approval is still		???????????".
		under the previous name and		
		was issued by the local		
		environmental protection		
		department in October 2006.		
		The factory does		
		not have any formal written		
		policies or procedures on		
		Environmental Protection.		
		<ol><li>The factory does</li></ol>		
		not have a statement of factory		
		management's general support		
		of energy and water efficiency or		
		a commitment to minimize		
		impacts with respect to air		
		emissions waste hazardous		
		materials and other applicable		
		environmental risks.		
		<ol> <li>The factory does</li> </ol>		
		not have a procedure to manage		
		the factory's environmental		
		impact to its surroundings nor		
		does it identify whether its on-		
		site operations generate any		
		negative environmental impacts.		
		Therefore the factory is not		
707.5		making an effort to reduce its.  1. The factory does	0 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
XX.5	Please refer to the 10		Create and issue a statement of 02-10-2017	environment policy Completed
	assessment report for	not have the Environmental	the factory management's	provided.
	benchmark information.	Protection Final Acceptance	general support of energy and	
	For assessments	Check Report for their	water efficiency and a	
	conducted prior to 2020	completed construction project.	commitment to minimize	
	benchmark numbers reflect	Additionally the factory has not	impacts with respect to air emissions waste hazardous	
	the FLA's 2011 Workplace	updated its Environmental		
	Compliance Benchmarks.	Impact Report and Approval to	materials and other applicable	
	Compliance Benchmarks.	reflect the factory name change		
	Compliance Benchmarks.	reflect the factory name change which occurred in June 2013.	materials and other applicable	
	Compliance Benchmarks.	reflect the factory name change which occurred in June 2013. The related approval is still	materials and other applicable	
	Compliance Benchmarks.	reflect the factory name change which occurred in June 2013. The related approval is still under the previous name and	materials and other applicable	
	Compliance Benchmarks.	reflect the factory name change which occurred in June 2013. The related approval is still under the previous name and was issued by the local	materials and other applicable	
	Compliance Benchmarks.	reflect the factory name change which occurred in June 2013. The related approval is still under the previous name and was issued by the local environmental protection	materials and other applicable	
	Compliance Benchmarks.	reflect the factory name change which occurred in June 2013. The related approval is still under the previous name and was issued by the local environmental protection department in October 2006.	materials and other applicable	
	Compliance Benchmarks.	reflect the factory name change which occurred in June 2013. The related approval is still under the previous name and was issued by the local environmental protection department in October 2006. 2. The factory does	materials and other applicable	
	Compliance Benchmarks.	reflect the factory name change which occurred in June 2013. The related approval is still under the previous name and was issued by the local environmental protection department in October 2006. 2. The factory does not have any formal written	materials and other applicable	
	Compliance Benchmarks.	reflect the factory name change which occurred in June 2013. The related approval is still under the previous name and was issued by the local environmental protection department in October 2006. 2. The factory does	materials and other applicable	
	Compliance Benchmarks.	reflect the factory name change which occurred in June 2013. The related approval is still under the previous name and was issued by the local environmental protection department in October 2006. 2. The factory does not have any formal written	materials and other applicable	
	Compliance Benchmarks.	reflect the factory name change which occurred in June 2013. The related approval is still under the previous name and was issued by the local environmental protection department in October 2006.  2. The factory does not have any formal written policies or procedures on Environmental Protection.	materials and other applicable	
	Compliance Benchmarks.	reflect the factory name change which occurred in June 2013. The related approval is still under the previous name and was issued by the local environmental protection department in October 2006.  2. The factory does not have any formal written policies or procedures on Environmental Protection.  3. The factory does	materials and other applicable	
	Compliance Benchmarks.	reflect the factory name change which occurred in June 2013. The related approval is still under the previous name and was issued by the local environmental protection department in October 2006.  2. The factory does not have any formal written policies or procedures on Environmental Protection.  3. The factory does not have a statement of factory does not have a statement of factory does	materials and other applicable	
	Compliance Benchmarks.	reflect the factory name change which occurred in June 2013. The related approval is still under the previous name and was issued by the local environmental protection department in October 2006.  2. The factory does not have any formal written policies or procedures on Environmental Protection.  3. The factory does not have a statement of factory management's general support	materials and other applicable	
	Compliance Benchmarks.	reflect the factory name change which occurred in June 2013. The related approval is still under the previous name and was issued by the local environmental protection department in October 2006.  2. The factory does not have any formal written policies or procedures on Environmental Protection.  3. The factory does not have a statement of factory management's general support of energy and water efficiency or	materials and other applicable	
	Compliance Benchmarks.	reflect the factory name change which occurred in June 2013. The related approval is still under the previous name and was issued by the local environmental protection department in October 2006.  2. The factory does not have any formal written policies or procedures on Environmental Protection.  3. The factory does not have a statement of factory management's general support of energy and ware efficiency or a commitment to minimize	materials and other applicable	
	Compliance Benchmarks.	reflect the factory name change which occurred in June 2013. The related approval is still under the previous name and was issued by the local environmental protection department in October 2006.  2. The factory does not have any formal written policies or procedures on Environmental Protection.  3. The factory does not have a statement of factory management's general support of energy and water efficiency or a commitment to minimize impacts with respect to air	materials and other applicable	
	Compliance Benchmarks.	reflect the factory name change which occurred in June 2013. The related approval is still under the previous name and was issued by the local environmental protection department in October 2006.  2. The factory does not have any formal written policies or procedures on Environmental Protection.  3. The factory does not have a statement of factory management's general support of energy and water efficiency or a commitment to minimize impacts with respect to air emissions waste hazardous	materials and other applicable	
	Compliance Benchmarks.	reflect the factory name change which occurred in June 2013. The related approval is still under the previous name and was issued by the local environmental protection department in October 2006.  2. The factory does not have any formal written policies or procedures on Environmental Protection.  3. The factory does not have as a statement of factory management's general support of energy and water efficiency or a commitment to minimize impacts with respect to air emissions waste hazardous materials and other applicable	materials and other applicable	
	Compliance Benchmarks.	reflect the factory name change which occurred in June 2013. The related approval is still under the previous name and was issued by the local environmental protection department in October 2006.  2. The factory does not have any formal written policies or procedures on Environmental Protection.  3. The factory does not have a statement of factory managements general support of energy and water efficiency or a commitment to minimize impacts with respect to air emissions waste hazardous materials and other applicable environmental risks.	materials and other applicable	
	Compliance Benchmarks.	reflect the factory name change which occurred in June 2013. The related approval is still under the previous name and was issued by the local environmental protection department in October 2006.  2. The factory does not have any formal written policies or procedures on Environmental Protection.  3. The factory does not have a statement of factory management's general support of energy and water efficiency or a commitment to minimize impacts with respect to air emissions waste hazardous materials and other applicable environmental risks.  4. The factory does	materials and other applicable	
	Compliance Benchmarks.	reflect the factory name change which occurred in June 2013. The related approval is still under the previous name and was issued by the local environmental protection department in October 2006.  2. The factory does not have any formal written policies or procedures on Environmental Protection.  3. The factory does not have a statement of factory management's general support of energy and water efficiency or a commitment to minimize impacts with respect to air emissions waste hazardous materials and other applicable environmental risks.  4. The factory does not have a factory management of the foliations waste hazardous materials and other applicable environmental risks.  4. The factory does not have a procedure to manage	materials and other applicable	
	Compliance Benchmarks.	reflect the factory name change which occurred in June 2013. The related approval is still under the previous name and was issued by the local environmental protection department in October 2006.  2. The factory does not have any formal written policies or procedures on Environmental Protection.  3. The factory does not have a statement of factory management's general support of energy and water efficiency or a commitment to minimize impacts with respect to air emissions waste hazardous materials and other applicable environmental risks.  4. The factory does not have a procedure to manage the factory's environmental	materials and other applicable	
	Compliance Benchmarks.	reflect the factory name change which occurred in June 2013. The related approval is still under the previous name and was issued by the local environmental protection department in October 2006.  2. The factory does not have any formal written policies or procedures on Environmental Protection.  3. The factory does not have a statement of factory management's general support of energy and water efficiency or a commitment to minimize impacts with respect to air emissions waste hazardous materials and other applicable environmental risks.  4. The factory does not have a procedure to manage the factory's environmental impact to its surroundings nor	materials and other applicable	
	Compliance Benchmarks.	reflect the factory name change which occurred in June 2013. The related approval is still under the previous name and was issued by the local environmental protection department in October 2006.  2. The factory does not have any formal written policies or procedures on Environmental Protection.  3. The factory does not have a statement of factory management's general support of energy and water efficiency or a commitment to minimize impacts with respect to air emissions waste hazardous materials and other applicable environmental risks.  4. The factory does not have a procedure to manage the factory's environmental impact to its surroundings nor does it identify whether its on-	materials and other applicable	
	Compliance Benchmarks.	reflect the factory name change which occurred in June 2013. The related approval is still under the previous name and was issued by the local environmental protection department in October 2006.  2. The factory does not have any formal written policies or procedures on Environmental Protection.  3. The factory does not have a statement of factory management's general support of energy and water efficiency or a commitment to minimize impacts with respect to air emissions waste hazardous materials and other applicable environmental risks.  4. The factory does not have a procedure to manage the factory's environmental impact to its surroundings nor does it identify whether its onside the operations generale any	materials and other applicable	
	Compliance Benchmarks.	reflect the factory name change which occurred in June 2013. The related approval is still under the previous name and was issued by the local environmental protection department in October 2006.  2. The factory does not have any formal written policies or procedures on Environmental Protection.  3. The factory does not have a statement of factory management's general support of energy and water efficiency or a commitment to minimize impacts with respect to air emissions waste hazardous materials and other applicable environmental risks.  4. The factory does not have a procedure to manage the factory's environmental impact to its surroundings nor does it identify whether its onsite operations generate any negative environmental impacts.	materials and other applicable	
	Compliance Benchmarks.	reflect the factory name change which occurred in June 2013. The related approval is still under the previous name and was issued by the local environmental protection department in October 2006.  2. The factory does not have any formal written policies or procedures on Environmental Protection.  3. The factory does not have a statement of factory management's general support of energy and water efficiency or a commitment to minimize impacts with respect to air emissions waste hazardous materials and other applicable environmental risks.  4. The factory does not have a procedure to manage the factory's environmental impact to its surroundings nor does it identify whether its onside the operations generale any	materials and other applicable	

XX.6	Please refer to the 11	1. The factory does	Obtain the Environmental 02-10-2017	Environmental Impact Completed
	assessment report for	not have the Environmental	Protection Final Acceptance	Report and Approval in
	benchmark information.	Protection Final Acceptance	Check Report for their	progress
	For assessments	Check Report for their	completed construction project.	
	conducted prior to 2020 benchmark numbers reflect	completed construction project. Additionally the factory has not	Update its Environmental Impact Report and Approval to	
	the FLA's 2011 Workplace	updated its Environmental	reflect the factory name change	
	Compliance Benchmarks.	Impact Report and Approval to	which occurred in June 2013.	
	Compliance bencimarks.	reflect the factory name change	WHICH occurred in June 2015.	
		which occurred in June 2013.		
		The related approval is still		
		under the previous name and		
		was issued by the local		
		environmental protection		
		department in October 2006.		
		2. The factory does		
		not have any formal written		
		policies or procedures on		
		Environmental Protection.		
		The factory does		
		not have a statement of factory		
		management's general support		
		of energy and water efficiency or		
		a commitment to minimize		
		impacts with respect to air emissions waste hazardous		
		materials and other applicable		
		environmental risks.		
		4. The factory does		
		not have a procedure to manage		
		the factory's environmental		
		impact to its surroundings nor		
		does it identify whether its on-		
		site operations generate any		
		negative environmental impacts.		
		Therefore the factory is not		
HSE.1	Employers shall comply 12	naking an effort to reduce its.  1. The factory has 1. Install proper	1. Install proper guards – 02-10-2017	photo evidence provided. Completed
	with all national laws	not installed needle guards on guards – including needle	including needle guards pulley	·
	regulations and procedures	any of the sewing machines. guards pulley guards and eye-	guards and eye-protection	
	concerning health safety	The pulley guards for two protection shields – on all	shields – on all sewing	
	and the environment.	sewing machines are missing. sewing machines.	machines.	
		Additionally all three high-speed 2. Keep the toilets	Provide training to relative	
		sewing machines are missing clean and sanitized.	workers to ensure this does not	
		eye-protection guards.	reoccur.	
		2. The factory has		
		not obtained the Report on		
		Inspection and Acceptance of Completed Construction		
		Project for any the four main		
		factory buildings (built in 2007)		
		or for the temporary building that		
		is situated between production		
		Buildings 1 and 2 (built in 2014		
		and are approximately 807.5		
		square meters).		
		3. The factory was		
		established in December 2007		
		as a garment producer. There		
		are no major hazardous sources		
		in the factory. However the		
		factory did not obtain an		
		Assessment of Current		
		Condition of Occupational		
		Disease Hazards as legally		
		required.		
		required.  4. The toilets in the		
		required.  4. The toilets in the factory are not clean or		
		required.  4. The toilets in the factory are not clean or sanitized.		
		required.  4. The toilets in the factory are not clean or sanitized.  5. While the factory		
		required. 4. The toilets in the factory are not clean or sanitized. 5. While the factory has established a written		
		required.  4. The toilets in the factory are not clean or sanitized.  5. While the factory		

UCE 1	Empleyees shall see 1. 40	A The feature Land A 1 4 4 4	Apriles LID account to the Contract of the Con	procedureid-d
HSE.1	Employers shall comply 13	The factory has 1. Install proper  not installed people guarde installed people.  The factory has 1. Install proper installed people inst	Assign HR person to create a 02-10-2017	procedure provided. Completed
	with all national laws	not installed needle guards on guards – including needle	procedure to track all illnesses	
	regulations and procedures	any of the sewing machines. guards pulley guards and eye-	of workers and staff.	
	concerning health safety	The pulley guards for two protection shields – on all	Include in their KPIs the	
	and the environment.	sewing machines are missing. sewing machines.	responsibility for maintaining	
		Additionally all three high-speed 2. Keep the toilets	daily records of staff illnesses.	
		sewing machines are missing clean and sanitized.	•	
		eye-protection guards.		
		2. The factory has		
		not obtained the Report on		
		Inspection and Acceptance of		
		Completed Construction		
		Completed Construction Project for any the four main		
		Project for any the four main factory buildings (built in 2007)		
		or for the temporary building that		
		is situated between production		
		Buildings 1 and 2 (built in 2014		
		and are approximately 807.5		
		square meters).		
		3. The factory was		
		established in December 2007		
		as a garment producer. There		
		are no major hazardous sources		
		in the factory. However the		
		factory did not obtain an		
		Assessment of Current		
		Condition of Occupational		
		Disease Hazards as legally		
		required.		
		4. The toilets in the		
		factory are not clean or		
		sanitized.		
		<ol><li>While the factory</li></ol>		
		has established a written		
		lockout-tagout (LOTO) policy		
		and procedures it has not		
1105 /		created a list of equipment and	<u> </u>	
HSE.1	Employers shall comply 14	The factory has 1. Install proper	Assign responsibility for a staff 02-10-2017	toilet checklist provided. Completed
				·
	with all national laws	not installed needle guards on guards – including needle	member HR or manager to	
	regulations and procedures	not installed needle guards on guards – including needle any of the sewing machines. guards pulley guards and eye-	Keep the toilets clean and	
	regulations and procedures concerning health safety	not installed needle guards on guards – including needle any of the sewing machines. guards pulley guards and eye- The pulley guards for two protection shields – on all	Keep the toilets clean and sanitized.	, , , , ,
	regulations and procedures	not installed needle guards on any of the sewing machines.  The pulley guards for two sewing machines are missing. sewing machines.	Keep the toilets clean and sanitized. Their KPI is to	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed guards – including needle guards pulley guards and eye-protection shields – on all sewing machines.  Additionally all three high-speed 2. Keep the toilets	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing clean and sanitized.	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards. Including needle guards – including needle guards and eye-protection shields – on all sewing machines.	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets - Train cleaners	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has not obtained the Report on	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets - Train cleaners - Periodic daily spot check by	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has not obtained the Report on Inspection and Acceptance of	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets - Train cleaners - Periodic daily spot check by relevant HR person or	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has not obtained the Report on Inspection and Acceptance of Completed Construction	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets - Train cleaners - Periodic daily spot check by relevant HR person or management on toilet	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has not obtained the Report on Inspection and Acceptance of Completed Construction Project for any the four main	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets - Train cleaners - Periodic daily spot check by relevant HR person or management on toilet conditions.	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has not obtained the Report on Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007)	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets - Train cleaners - Periodic daily spot check by relevant HR person or management on toilet conditions Measure performance of	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has not obtained the Report on Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets - Train cleaners - Periodic daily spot check by relevant HR person or management on toilet conditions Measure performance of cleaners	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has not obtained the Report on Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets - Train cleaners - Periodic daily spot check by relevant HR person or management on toilet conditions Measure performance of cleaners - Provide reminders to workers	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has not obtained the Report on Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets - Train cleaners - Periodic daily spot check by relevant HR person or management on toilet conditions Measure performance of cleaners	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has not obtained the Report on Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets - Train cleaners - Periodic daily spot check by relevant HR person or management on toilet conditions Measure performance of cleaners - Provide reminders to workers	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has not obtained the Report on Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets - Train cleaners - Periodic daily spot check by relevant HR person or management on toilet conditions Measure performance of cleaners - Provide reminders to workers of proper use of toilets using	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has not obtained the Report on Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets - Train cleaners - Periodic daily spot check by relevant HR person or management on toilet conditions Measure performance of cleaners - Provide reminders to workers of proper use of toilets using	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has not obtained the Report on Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).  3. The factory was	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets - Train cleaners - Periodic daily spot check by relevant HR person or management on toilet conditions Measure performance of cleaners - Provide reminders to workers of proper use of toilets using	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has not obtained the Report on Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).  3. The factory was established in December 2007	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets - Train cleaners - Periodic daily spot check by relevant HR person or management on toilet conditions Measure performance of cleaners - Provide reminders to workers of proper use of toilets using	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has not obtained the Report on Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).  3. The factory was established in December 2007 as a garment producer. There	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets - Train cleaners - Periodic daily spot check by relevant HR person or management on toilet conditions Measure performance of cleaners - Provide reminders to workers of proper use of toilets using	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has not obtained the Report on Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).  3. The factory was established in December 2007 as a garment producer. There are no major hazardous sources	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets - Train cleaners - Periodic daily spot check by relevant HR person or management on toilet conditions Measure performance of cleaners - Provide reminders to workers of proper use of toilets using	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has not obtained the Report on Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).  3. The factory was established in December 2007 as a garment producer. There are no major hazardous sources in the factory. However the	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets - Train cleaners - Periodic daily spot check by relevant HR person or management on toilet conditions Measure performance of cleaners - Provide reminders to workers of proper use of toilets using	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has not obtained the Report on Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).  3. The factory was established in December 2007 as a garment producer. There are no major hazardous sources in the factory. However the factory did not obtain an	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets - Train cleaners - Periodic daily spot check by relevant HR person or management on toilet conditions Measure performance of cleaners - Provide reminders to workers of proper use of toilets using	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has not obtained the Report on Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).  3. The factory was established in December 2007 as a garment producer. There are no major hazardous sources in the factory. However the factory did not obtain an Assessment of Current	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets - Train cleaners - Periodic daily spot check by relevant HR person or management on toilet conditions Measure performance of cleaners - Provide reminders to workers of proper use of toilets using	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has not obtained the Report on Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).  3. The factory was established in December 2007 as a garment producer. There are no major hazardous sources in the factory. However the factory did not obtain an Assessment of Current Condition of Occupational	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets - Train cleaners - Periodic daily spot check by relevant HR person or management on toilet conditions Measure performance of cleaners - Provide reminders to workers of proper use of toilets using	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has not obtained the Report on Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).  3. The factory was established in December 2007 as a garment producer. There are no major hazardous sources in the factory. However the factory did not obtain an Assessment of Current Condition of Occupational Disease Hazards as legally	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets - Train cleaners - Periodic daily spot check by relevant HR person or management on toilet conditions Measure performance of cleaners - Provide reminders to workers of proper use of toilets using	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has not obtained the Report on Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).  3. The factory was established in December 2007 as a garment producer. There are no major hazardous sources in the factory. However the factory did not obtain an Assessment of Current Condition of Occupational Disease Hazards as legally required.	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets - Train cleaners - Periodic daily spot check by relevant HR person or management on toilet conditions Measure performance of cleaners - Provide reminders to workers of proper use of toilets using	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has not obtained the Report on Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).  3. The factory was established in December 2007 as a garment producer. There are no major hazardous sources in the factory. However the factory did not obtain an Assessment of Current Condition of Occupational Disease Hazards as legally required.  4. The toilets in the	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets - Train cleaners - Periodic daily spot check by relevant HR person or management on toilet conditions Measure performance of cleaners - Provide reminders to workers of proper use of toilets using	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has not obtained the Report on Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).  3. The factory was established in December 2007 as a garment producer. There are no major hazardous sources in the factory. However the factory did not obtain an Assessment of Current Condition of Occupational Disease Hazards as legally required.  4. The toilets in the factory are missing.	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets - Train cleaners - Periodic daily spot check by relevant HR person or management on toilet conditions Measure performance of cleaners - Provide reminders to workers of proper use of toilets using	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has not obtained the Report on Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).  3. The factory was established in December 2007 as a garment producer. There are no major hazardous sources in the factory. However the factory did not obtain an Assessment of Current Condition of Occupational Disease Hazards as legally required.  4. The toilets in the factory are not clean or sanitized.	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets - Train cleaners - Periodic daily spot check by relevant HR person or management on toilet conditions Measure performance of cleaners - Provide reminders to workers of proper use of toilets using	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has not obtained the Report on Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).  3. The factory was established in December 2007 as a garment producer. There are no major hazardous sources in the factory. However the factory did not obtain an Assessment of Current Condition of Occupational Disease Hazards as legally required.  4. The toilets in the factory  5. While the factory	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets - Train cleaners - Periodic daily spot check by relevant HR person or management on toilet conditions Measure performance of cleaners - Provide reminders to workers of proper use of toilets using	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has not obtained the Report on Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).  3. The factory was established in December 2007 as a garment producer. There are no major hazardous sources in the factory. However the factory did not obtain an Assessment of Current Condition of Occupational Disease Hazards as legally required.  4. The toilets in the factory has established a written	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets - Train cleaners - Periodic daily spot check by relevant HR person or management on toilet conditions Measure performance of cleaners - Provide reminders to workers of proper use of toilets using	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has not obtained the Report on Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).  3. The factory was established in December 2007 as a garment producer. There are no major hazardous sources in the factory. However the factory did not obtain an Assessment of Current Condition of Occupational Disease Hazards as legally required.  4. The toilets in the factory has established a written lockout-tagout (LOTO) policy	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets - Train cleaners - Periodic daily spot check by relevant HR person or management on toilet conditions Measure performance of cleaners - Provide reminders to workers of proper use of toilets using	
	regulations and procedures concerning health safety	not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has not obtained the Report on Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).  3. The factory was established in December 2007 as a garment producer. There are no major hazardous sources in the factory. However the factory did not obtain an Assessment of Current Condition of Occupational Disease Hazards as legally required.  4. The toilets in the factory has established a written	Keep the toilets clean and sanitized. Their KPI is to - create a maintenance and checklist procedure for cleaning toilets - Train cleaners - Periodic daily spot check by relevant HR person or management on toilet conditions Measure performance of cleaners - Provide reminders to workers of proper use of toilets using	

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HSE.1	Employers shall comply 15	The factory has 1. Install proper	Communicate with the relevant 02-10-2017	Assessment of Current Completed
	with all national laws	not installed needle guards on guards – including needle	local officials or Government	Condition of Occupational
	regulations and procedures	any of the sewing machines. guards pulley guards and eye-	department and obtain an	Disease Hazards in
	concerning health safety	The pulley guards for two protection shields – on all	assessment of the current	progress
	and the environment.	sewing machines are missing. sewing machines.	conditions of Occupational	
		Additionally all three high-speed 2. Keep the toilets	Disease Hazards as legally	
		sewing machines are missing clean and sanitized.	required.	
		eye-protection guards.	•	
		2. The factory has		
		not obtained the Report on		
		Inspection and Acceptance of		
		Completed Construction		
		Project for any the four main		
		factory buildings (built in 2007)		
		or for the temporary building that		
		is situated between production		
		Buildings 1 and 2 (built in 2014		
		and are approximately 807.5		
		and are approximately 807.5 square meters).		
		square meters).  3. The factory was		
		The factory was established in December 2007		
		as a garment producer. There		
		are no major hazardous sources		
		in the factory. However the		
		factory did not obtain an		
		Assessment of Current		
		Condition of Occupational		
		Disease Hazards as legally		
		required.		
		4. The toilets in the		
		factory are not clean or		
		sanitized.		
		5. While the factory		
		has established a written		
		lockout-tagout (LOTO) policy		
		and procedures it has not		
HSE.1	Employers shall comply 16	1. The factory has 1. Install proper	Communicate with the relevant 02-10-2017	inspection reports Completed
•	with all national laws	not installed needle guards on guards – including needle	local officials or local	provided.
	regulations and procedures	any of the sewing machines. guards pulley guards and eye-	Government Department and	•
	concerning health safety	The pulley guards for two protection shields – on all	obtain the Report on Inspection	
	and the environment.	sewing machines are missing. sewing machines.	and Acceptance of Completed	
	***************************************	Additionally all three high-speed 2. Keep the toilets	Construction Project for the four	
		sewing machines are missing clean and sanitized.	main factory buildings (built in	
		eve-protection guards.	2007) and for the temporary	
		2 The factory has	building that is situated between	
		Z. 1116 IAGIOI V 1183		
		not obtained the Report on	production Buildings 1 and 2	
		2. The factory has not obtained the Report on Inspection and Acceptance of		
		not obtained the factory has not obtained the Report on Inspection and Acceptance of Completed Construction	production Buildings 1 and 2	
		Inspection and Acceptance of Completed Construction Project for any the four main	production Buildings 1 and 2	
		Inspection and Acceptance of Completed Construction	production Buildings 1 and 2	
		Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007)	production Buildings 1 and 2	
		Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that	production Buildings 1 and 2	
		Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production	production Buildings 1 and 2	
		Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014	production Buildings 1 and 2	
		Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5	production Buildings 1 and 2	
		Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).	production Buildings 1 and 2	
		Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).  3. The factory was	production Buildings 1 and 2	
		Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters). 3. The factory was established in December 2007	production Buildings 1 and 2	
		Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters). 3. The factory was established in December 2007 as a garment producer. There	production Buildings 1 and 2	
		Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).  3. The factory was established in December 2007 as a garment producer. There are no major hazardous sources	production Buildings 1 and 2	
		Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters). 3. The factory was established in December 2007 as a garment producer. There are no major hazardous sources in the factory. However the	production Buildings 1 and 2	
		Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters). 3. The factory was established in December 2007 as a garment producer. There are no major hazardous sources in the factory did not obtain an	production Buildings 1 and 2	
		Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).  The factory was established in December 2007 as a garment producer. There are no major hazardous sources in the factory. However the factory did not obtain an Assessment of Current	production Buildings 1 and 2	
		Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters). 3. The factory was established in December 2007 as a garment producer. There are no major hazardous sources in the factory. However the factory did not obtain an Assessment of Current Condition of Occupational	production Buildings 1 and 2	
		Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).  3. The factory was established in December 2007 as a garment producer. There are no major hazardous sources in the factory. However the factory did not obtain an Assessment of Current Condition of Occupational Disease Hazards as legally	production Buildings 1 and 2	
		Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).  3. The factory was established in December 2007 as a garment producer. There are no major hazardous sources in the factory. However the factory did not obtain an Assessment of Current Condition of Occupational Disease Hazards as legally required.	production Buildings 1 and 2	
		Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters). 3. The factory was established in December 2007 as a garment producer. There are no major hazardous sources in the factory. However the factory did not obtain an Assessment of Current Condition of Occupational Disease Hazards as legally required. 4. The toilets in the	production Buildings 1 and 2	
		Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).  3. The factory was established in December 2007 as a garment producer. There are no major hazardous sources in the factory, However the factory did not obtain an Assessment of Current Condition of Occupational Disease Hazards as legally required.  4. The toilets in the factory are not clean or	production Buildings 1 and 2	
		Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).  3. The factory was established in December 2007 as a garment producer. There are no major hazardous sources in the factory. However the factory did not obtain an Assessment of Current Condition of Occupational Disease Hazards as legally required.  4. The toilets in the factory are not clean or sanitized.	production Buildings 1 and 2	
		Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).  3. The factory was established in December 2007 as a garment producer. There are no major hazardous sources in the factory. However the factory did not obtain an Assessment of Current Condition of Occupational Disease Hazards as legally required.  4. The toilets in the factory are not clean or samitized.  5. While the factory	production Buildings 1 and 2	
		Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).  3. The factory was established in December 2007 as a garment producer. There are no major hazardous sources in the factory. However the factory did not obtain an Assessment of Current Condition of Occupational Disease Hazards as legally required.  4. The toilets in the factory are not clean or sanitized. 5. While the factory has established a written	production Buildings 1 and 2	
		Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).  3. The factory was established in December 2007 as a garment producer. There are no major hazardous sources in the factory. However the factory did not obtain an Assessment of Current Condition of Occupational Disease Hazards as legally required.  4. The toilets in the factory are not clean or samitized.  5. While the factory	production Buildings 1 and 2	

TIOE 4	5	The fortunal control of the H	0	to the control of the last of
HSE.1	Employers shall comply 17 with all national laws regulations and procedures concerning health safety and the environment.	1. The factory has not installed needle guards on any of the sewing machines. The pulley guards for two sewing machines are missing. Additionally all three high-speed sewing machines are missing eye-protection guards.  2. The factory has not obtained the Report on Inspection and Acceptance of Completed Construction Project for any the four main factory buildings (built in 2007) or for the temporary building that is situated between production Buildings 1 and 2 (built in 2014 and are approximately 807.5 square meters).  3. The factory was established in December 2007 as a garment producer. There are no major hazardous sources in the factory. However the factory did not obtain an Assessment of Current Condition of Occupational Disease Hazards as legally required.	Create a list of equipment and 02-10-2017 machines that require the LOTO procedure and implement LOTO in the factory.  Train the relevant staff and assign responsibility to a staff member for ongoing training and refresher courses.	training content and Completed attendance provided.
		4. The toilets in the factory are not clean or sanitized. 5. While the factory has established a written lockout-tagout (LOTO) policy and procedures it has not		
HSE.1	Employers shall comply 18 with all national laws regulations and procedures concerning health safety and the environment.	1. Install a backup system does not have a backup battery.  2. Seven fire extinguishers (about 10%) in the office building are placed directly on the ground instead of mounted as required.  3. Two fire alarm buttons are partially blocked by production materials one each in the warehouse and sewing workshop.  4. Two out of the four emergency exits in the sewing workshop are locked during working hours. The workshop is approximately 1360.38 square meters and has 120 workers.  5. The evacuation passages for about 5% of the sewing workers are completely blocked by production materials.  6. The factory's emergency evacuation plan is incomplete as the location of first aid kits are not shown on the plan.  7. The emergency alarm is not inspected or tested regularly.  8. The fire brigade does not have the appropriate personal protective equipment (PPE) to feith fires (such as a	1. Assign at least 2 people in management or HR who are responsible for ensuring that the factory creates a policy on fire safety procedures.  2. Assign these staff to provide regular training on fire safety (minimum every 6 months) to workers and management.  3. Assign these staff to provide monthly internal monitoring system of all Health and Safety issues including fire systems.  4. Assign these staff to create a tool or checklist to follow and to complete this every month.  5. Provide the fire brigade with the necessary PPE and train them on its use.	photo evidence provided. Completed Factory stated that "PPE provided and arrange training in annualy fire-drill. ???????????????????????????????????

HSE.1	Employers shall comply 19	The fire alarm 1. Install a backup	1. Assign at least 2 people in 02-10-2017	photo of cleared passages Completed
ISE.1	with all national laws	system does not have a backup battery on the fire alarm system	management or HR who are	provided. Factory stated
	regulations and procedures	battery. in the factory.	responsible for ensuring that the	that ""Monitors of each line
	concerning health safety	2. Seven fire 2. Mount fire	factory creates a policy on fire	be responsible for semi-
	and the environment.	extinguishers (about 10%) in the extinguishers in the right	safety procedures.	finished products stacking.
	and the environment.	office building are placed directly position (between 0.08 - 1.5	2. Assign these staff to provide	No stacking at path way.
		on the ground instead of meters) or install fire	regular training on fire safety	Provide necessary
		mounted as required. extinguishers in extinguisher	(minimum every 6 months) to	removable stacking facility.
		3. Two fire alarm boxes as per legal	workers and management.	777777777777777777
		buttons are partially blocked by requirements.	3. Assign these staff to provide	??????????????
		production materials one each in 3. Move materials	monthly internal monitoring	
		the warehouse and sewing away from the fire alarm buttons	system of all Health and Safety	
		workshop. and evacuation passages and	issues including fire systems.	
		4. Two out of the keep them free of obstructions.	4. Assign these staff to create a	
		four emergency exits in the Regularly monitor for	tool or checklist to follow and to	
		sewing workshop are locked compliance.	complete this every month.	
		during working hours. The 4. Ensure that all	5. Ensure all evacuation	
		workshop is approximately emergency exits remain	passages of the sewing workers	
		1360.38 square meters and has unlocked during working hours.	are completely unblocked by	
		120 workers. 5. Mark the	production materials.	
		5. The evacuation location of fire alarms on the	production materials.	
		passages for about 5% of the emergency plan maps.		
		sewing workers are completely 6. Provide the fire		
		blocked by production materials. brigade with the necessary PPE		
		6. The factory's and train them on its use.		
		emergency evacuation plan is		
		incomplete as the location of		
		first aid kits are not shown on		
		the plan.		
		7. The emergency		
		alarm is not inspected or tested		
		regularly.		
		8. The fire brigade		
		does not have the appropriate		
		personal protective equipment		
		(PPE) to fight fires (such as a		
		hreathing apparatus)		
SE.1	Employers shall comply 20	hreathing apparatus). 1. The fire alarm 1. Install a backup	1. Assign at least 2 people in 02-10-2017	photo of exits provided. Completed
	with all national laws	system does not have a backup battery on the fire alarm system	management or HR who are	Factory stated that
	regulations and procedures	battery. in the factory.	responsible for ensuring that the	""Emergency exits remain
	concerning health safety	2. Seven fire 2. Mount fire	factory creates a policy on fire	unlcoked during working
	and the environment.	extinguishers (about 10%) in the extinguishers in the right	safety procedures.	hour. ???????????""
		office building are placed directly position (between 0.08 - 1.5	Assign these staff to provide	
		on the ground instead of meters) or install fire	regular training on fire safety	
		mounted as required. extinguishers in extinguisher	(minimum every 6 months) to	
		Two fire alarm boxes as per legal	workers and management.	
		buttons are partially blocked by requirements.	Assign these staff to provide	
		production materials one each in 3. Move materials	monthly internal monitoring	
		the warehouse and sewing away from the fire alarm buttons	system of all Health and Safety	
		workshop. and evacuation passages and	issues including fire systems.	
		4. Two out of the keep them free of obstructions.	Assign these staff to create a	
		four emergency exits in the Regularly monitor for	tool or checklist to follow and to	
		sewing workshop are locked compliance.	complete this every month.	
		during working hours. The 4. Ensure that all	Ensure that all emergency	
		workshop is approximately emergency exits remain	exits remain unlocked during	
		1360.38 square meters and has unlocked during working hours.	working hours.	
		120 workers. 5. Mark the	3	
		<ol><li>The evacuation location of fire alarms on the</li></ol>		
		passages for about 5% of the emergency plan maps.		
		sewing workers are completely 6. Provide the fire		
		blocked by production materials. brigade with the necessary PPE		
		6. The factory's and train them on its use.		
		emergency evacuation plan is		
		incomplete as the location of		
		first aid kits are not shown on		
		the plan.		
		7. The emergency		
		alarm is not inspected or tested		
		regularly.		
		8. The fire brigade		
		does not have the appropriate		
		personal protective equipment		
		(PPE) to fight fires (such as a		
		(i i L) to light lifes (such as a		

HSE.1	Employers shall comply 21 with all national laws	The fire alarm     Install a backup system does not have a backup battery on the fire alarm system	Assign at least 2 people in 02-10-2017 management or HR who are	photo of checklist Completed provided. Factory stated
	regulations and procedures	battery. in the factory.	responsible for ensuring that the	that ""Test and inspect
	concerning health safety	2. Seven fire 2. Mount fire	factory creates a policy on fire	emergency alarm monthly
	and the environment.	extinguishers (about 10%) in the extinguishers in the right	safety procedures.	and set up separate check
		office building are placed directly position (between 0.08 - 1.5	Assign these staff to provide	list.???????????????
		on the ground instead of meters) or install fire	regular training on fire safety	??????????""
		mounted as required. extinguishers in extinguisher 3. Two fire alarm boxes as per legal	(minimum every 6 months) to workers and management.	
		buttons are partially blocked by requirements.	3. Assign these staff to provide	
		production materials one each in 3. Move materials	monthly internal monitoring	
		the warehouse and sewing away from the fire alarm buttons	system of all Health and Safety	
		workshop. and evacuation passages and	issues including fire systems.	
		<ol> <li>Two out of the keep them free of obstructions.</li> </ol>	Assign these staff to create a	
		four emergency exits in the Regularly monitor for sewing workshop are locked compliance.	tool or checklist to follow and to complete this every month.	
		during workshop are locked compliance.  during working hours. The 4. Ensure that all	5. Inspect and test the	
		workshop is approximately emergency exits remain	emergency alarm regularly.	
		1360.38 square meters and has unlocked during working hours.	omorgonoy alam rogalary.	
		120 workers. 5. Mark the		
		<ol><li>The evacuation location of fire alarms on the</li></ol>		
		passages for about 5% of the emergency plan maps.		
		sewing workers are completely 6. Provide the fire		
		blocked by production materials. brigade with the necessary PPE 6. The factory's and train them on its use.		
		emergency evacuation plan is		
		incomplete as the location of		
		first aid kits are not shown on		
		the plan.		
		7. The emergency		
		alarm is not inspected or tested		
		regularly. 8. The fire brigade		
		does not have the appropriate		
		personal protective equipment		
		(PPE) to fight fires (such as a		
HSE.1	Employers shall comply 22	hreathing apparatus)  1. The fire alarm  1. Install a backup	1. Assign at least 2 people in 02-10-2017	photo of back up battery Completed
I IOL. I	with all national laws	system does not have a backup battery on the fire alarm system	management or HR who are	provided.
	regulations and procedures	battery. in the factory.	responsible for ensuring that the	p
	concerning health safety	2. Seven fire 2. Mount fire	factory creates a policy on fire	
	and the environment.	extinguishers (about 10%) in the extinguishers in the right	safety procedures.	
		office building are placed directly position (between 0.08 - 1.5	Assign these staff to provide	
		on the ground instead of meters) or install fire mounted as required. extinguishers in extinguisher	regular training on fire safety (minimum every 6 months) to	
		3. Two fire alarm boxes as per legal	workers and management.	
		buttons are partially blocked by requirements.	3. Assign these staff to provide	
		production materials one each in 3. Move materials	monthly internal monitoring	
		the warehouse and sewing away from the fire alarm buttons	system of all Health and Safety	
		workshop. and evacuation passages and	issues including fire systems.	
		<ol> <li>Two out of the keep them free of obstructions.</li> </ol>	Assign these staff to create a	
		four emergency exits in the sewing workshop are locked compliance.	tool or checklist to follow and to complete this every month.	
		sewing workshop are locked compliance. during working hours. The 4. Ensure that all	5. Install a backup battery on	
		workshop is approximately emergency exits remain	the fire alarm system in the	
		1360.38 square meters and has unlocked during working hours.	factory.	
		120 workers. 5. Mark the	,	
		<ol><li>The evacuation location of fire alarms on the</li></ol>		
		passages for about 5% of the emergency plan maps.		
		sewing workers are completely 6. Provide the fire		
		blocked by production materials. brigade with the necessary PPE 6. The factory's and train them on its use.		
		b. The factory's and train them on its use. emergency evacuation plan is		
		incomplete as the location of		
		first aid kits are not shown on		
		the plan.		
		7. The emergency		
		alarm is not inspected or tested		
		regularly.		
		8. The fire brigade		
		does not have the appropriate personal protective equipment		
		(PPE) to fight fires (such as a		

with regu conv	loyers shall comply 23 all national laws lations and procedures erning health safety the environment.	2. Seven fire extinguishers (about 10%) in the office building are placed directly on the ground instead of mounted as required.  3. Two fire alarm buttons are partially blocked by production materials one each in the warehouse and sewing workshop.  Two out of the four emergency exits in the sewing workshop are locked during working hours. The workshop is approximately 1360.38 square meters and has 120 workers.  5. The evacuation passages for about 5% of the sewing works are completely blocked by production materials.	in the factory.  2. Mount fire extinguishers in the right position (between 0.08 - 1.5 meters) or install fire extinguishers in extinguisher boxes as per legal requirements. 3. Move materials away from the fire alarm buttons and evacuation passages and keep them free of obstructions. Regularly monitor for compliance. 4. Ensure that all emergency exits remain unlocked during working hours. 5. Mark the location of fire alarms on the emergency plan maps. 6. Provide the fire	1. Assign at least 2 people in management or HR who are responsible for ensuring that the factory creates a policy on fire safety procedures.  2. Assign these staff to provide regular training on fire safety (minimum every 6 months) to workers and management.  3. Assign these staff to provide monthly internal monitoring system of all Health and Safety issues including fire systems.  4. Assign these staff to create a tool or checklist to follow and to complete this every month.  5. Mark the location of fire alarms on the emergency plan maps.	updated the plan provided. Completed
with regu cond	loyers shall comply 24 all national laws lations and procedures erning health safety the environment.	system does not have a backup battery.  2. Seven fire extinguishers (about 10%) in the office building are placed directly on the ground instead of mounted as required.  3. Two fire alarm buttons are partially blocked by production materials one each in the warehouse and sewing workshop.  4. Two out of the four emergency exits in the sewing workshop are locked during working hours. The workshop is approximately 1360.38 square meters and has 120 workers.  5. The evacuation passages for about 5% of the sewing workers are completely blocked by production materials.	in the factory.  2. Mount fire extinguishers in the right position (between 0.08 - 1.5 meters) or install fire extinguishers in extinguisher boxes as per legal requirements.  3. Move materials away from the fire alarm buttons and evacuation passages and keep them free of obstructions. Regularly monitor for compliance.  4. Ensure that all emergency exits remain unlocked during working hours. 5. Mark the location of fire alarms on the emergency plan maps. 6. Provide the fire	2. Mount fire extinguishers in 02-10-2017 the right position (between 0.08 - 1.5 meters) or install fire extinguishers in extinguisher boxes as per legal requirements.	photo of extinguisher provided. Factory stated that ""Extinguishers and extinguisher boxes installed as per legal requirement Noc. 24 2016. ??2016.11.24??????????????????????????????????

HSE.1	Employers shall comply 25 with all national laws regulations and procedures concerning health safety and the environment.	1. The fire alarm system does not have a backup battery. 2. Seven fire extinguishers (about 10%) in the office building are placed directly on the ground instead of mounted as required. 3. Two fire alarm buttons are partially blocked by production materials one each in the warehouse and sewing workshop. 4. Two out of the four emergency exits in the sewing workshop are locked during working hours. The workshop is approximately 1360.38 square meters and has 120 workers. 5. The evacuation passages for about 5% of the sewing workers are completely blocked by production materials. 6. The factory's emergency evacuation plan is incomplete as the location of first alid kits are not shown on the plan. 7. The emergency alarm is not inspected or tested regularly. 8. The fire brigade does not have the appropriate personal protective equipment (PPE) to filth fires (such as a	3. Move materials away from 02-10-2017 the fire alarm buttons and evacuation passages and keep them free of obstructions. Regularly monitor for compliance.	photo of cleared area Completed provide. Factory stated that "Monitors of each line be responsible for the semi-finished products' stacking. No stacking at alarm area. ????????????????????????????????????
HOW.1.1	Employers shall comply 27 with all national laws regulations and procedures concerning hours of work public holidays and leave.	The working-hours records were possibly inauthentic as wages are calculated based on inaccurate working hours. Therefore assessors could not draw conclusions on factory compliance for wages and working hours. Onsite observation and testing found that one out of three sampled workers could not access the fingerprinting time record system (it did not recognize her fingerprinting mere record system during lunch break. This is contrary to the provided records which show all workers using the fingerprinting mere cord system during the lunch break. Furthermore the factory only provided two sampled workers' time records for the past 12 months; the time records of the other workers were not provided for assessors' review. Factory management stated that the administrator for the time record was not available during the assessment time and the other management staff did not have the authority to access the system.	1. Maintain accurate and authentic working hours and payroll records. 2. Provide a copy of working-hours records to the assessor prior to any audit. 3. Ensure that the time record administrator is available and on site for the audit. 4. Ensure that all records are available to assessors upon request during an audit.	Completed record of working hours provided.

XX.11	Please refer to the 32 assessment report for benchmark information. For assessments conducted prior to 2020 benchmark numbers reflect the FLA's 2011 Workplace Compliance Benchmarks.	1. The factory has not created written job descriptions for any of the positions. 2. The factory does not have written policies and procedures outlining the process for performance reviews; therefore the factory does not conduct regular performance reviews. 3. There are no policies and procedures regarding workers' career paths or Personnel Development; therefore the factory does not have specific career paths or skill development plans for workers. 4. The factory has not hirred any disabled workers which is a violation of legal requirements that state at least 1.5% of the total workforce should be composed of disabled workers. Although the factory contributes to the Employment Security Fund in lieu of employing disabled workers as allowed by the local law this practice carries the risk of discrimination based on FLA Workplace Code and Benchmarks.	Create written policies and procedures outlining the process for performance reviews and conduct regular performance reviews.	samples of performance reviews provided.
XX.7	Please refer to the 28 assessment report for benchmark information. For assessments conducted prior to 2020 benchmark numbers reflect the FLA's 2011 Workplace Compliance Benchmarks.	I. Management did not provide any office space or other facilities for worker representatives to meet. 2. FLA Comments: The Chinese constitution guarantees Freedom of Association; however the Trade Union Act prevents the establishment of trade unions independent of the sole official trade union – the All- China Federation of Trade Unions (ACFTU). According to the International Labor Organization (ILO) many provisions of the Trade Union Act are contrary to the fundamental principles of freedom of association including the non-recognition of the right to strike. As a consequence all factories in China fall short of the ILO standards on the right to organize and bargain collectively. Recently however the government has introduced new regulations that could improve the functioning of the labor relations' mechanisms. The Amended Trade Union Act of October 2001 stipulates that union committees have to be democratically elected at members' assemblies and trade unions must be accountable to their members. The trade union	Explore ways to incorporate and 02-10-2017 apply these provisions within the factory and worker voice. Hold regular meetings between management and worker representatives.  Assign responsibility to workers representatives to act as a voice for their peers and to in turn convey management's feedback to the workers.	evidence of Freedom of Association policy provided and factory stated: ""Factory to build up compliant procedure and Highrock FLA team do random snap check.????????????????????????????????????

XX.8	Please refer to the 29 assessment report for benchmark information. For assessments conducted prior to 2020 benchmark numbers reflect the FLA's 2011 Workplace Compliance Benchmarks.	1. Management did not provide any office space or other facilities for worker representatives to meet. 2. FLA Comments: The Chinese constitution guarantees Freedom of Association; however the Trade Union Act prevents the establishment of trade unions independent of the sole official trade union – the All-China Federation of Trade Unions (ACFTU). According to the International Labor Organization (ILO) many provisions of the Trade Union Act are contrary to the fundamental principles of freedom of association including the non-recognition of the right to strike. As a consequence all factories in China fall short of the ILO standards on the right to organize and bargain collectively. Recently however the government has introduced new regulations that could improve the functioning of the labor relations' mechanisms.  The Amended Trade Union Act of October 2001 stipulates that union committees have to be democratically elected at	Provide office space or other facilities for worker representatives to meet.	02-10-2017	photos of office provided. Completed
		members' assemblies and trade unions must be accountable to			
		their members. The trade union			
XX.10	Please refer to the 31 assessment report for benchmark information. For assessments conducted prior to 2020 benchmark numbers reflect the FLA's 2011 Workplace Compliance Benchmarks.	1. The factory has not created written job descriptions for any of the positions. 2. The factory does not have written policies and procedures outlining the process for performance reviews; therefore the factory does not conduct regular performance reviews. 3. There are no policies and procedures regarding workers' career paths or Personnel Development; therefore the factory does not have specific career paths or skill development plans for workers. 4. The factory has not hired any disabled workers which is a violation of legal requirements that state at least 1.5% of the total workforce should be composed of disabled workers. Although the factory contributes to the Employment Security Fund in lieu of employing disabled workers as allowed by the local law this practice carries the risk of discrimination based on FLA Workplace Code and	Create written job descriptions for all positions.	02-10-2017	samples of job descriptions Completed provided .

Benchmarks.

<.12	Please refer to the 33	1. The factory has	Look for ways to hire disabled 02-10-2017	receipt of disable workers	Completed
W. 12	assessment report for	not created written job	workers as appropriate.	insurance provided.	22
	benchmark information.	descriptions for any of the	Identify what positions are	·	
	For assessments	positions.	suitable for disabled workers.		
	conducted prior to 2020	The factory does	Include in advertisements for job		
	benchmark numbers reflect	not have written policies and	opportunities that candidates		
the FLA's 2011 Workplace	the FLA's 2011 Workplace Compliance Benchmarks.	procedures outlining the process	with disabilities are welcome to		
	Compilance Benchmarks.	for performance reviews; therefore the factory does not	apply.		
		conduct regular performance			
		reviews.			
		3. There are no			
		policies and procedures			
		regarding workers' career paths			
		or Personnel Development;			
		therefore the factory does not			
		have specific career paths or			
		skill development plans for			
		workers.			
		The factory has not hired any disabled workers			
		not nired any disabled workers which is a violation of legal			
		requirements that state at least			
		1.5% of the total workforce			
		should be composed of disabled			
		workers. Although the factory			
		contributes to the Employment			
		Security Fund in lieu of			
		employing disabled workers as			
		allowed by the local law this			
		practice carries the risk of			
		discrimination based on FLA			
		Workplace Code and			
9	Please refer to the 30	Benchmarks.  1. The factory has	Create policies and procedures 02-10-2017	sample of skill	Complete
9	assessment report for	not created written job	regarding workers' career paths	development plan	Complete
	benchmark information.	descriptions for any of the	and Personnel Development;	provided.	
	For assessments	positions.	create specific career paths or	provided.	
	conducted prior to 2020	2. The factory does	skill development plans for		
	benchmark numbers reflect	not have written policies and	workers.		
	the FLA's 2011 Workplace	procedures outlining the process	Please also integrate workers'		
	Compliance Benchmarks.	for performance reviews;	thoughts when you establish		
		therefore the factory does not	policy and procedure. That		
		conduct regular performance	would help you in the following		
		reviews.	training.		
		3. There are no			
		policies and procedures			
		regarding workers' career paths or Personnel Development;			
		therefore the factory does not			
		have specific career paths or			
		skill development plans for			
		workers.			
		4. The factory has			
		not hired any disabled workers			
		which is a violation of legal			
		requirements that state at least			
		1.5% of the total workforce			
		should be composed of disabled			
		workers. Although the factory			
		contributes to the Employment			
		Security Fund in lieu of			
		employing disabled workers as			
		allowed by the local law this practice carries the risk of			
		practice carries the risk of discrimination based on FLA			
	Workplace Code and				
		Benchmarks.			
	Please refer to the 2	The factory has not formally	Define in writing the person(s) 02-10-2017	job description and	Complete
-	assessment report for	defined in writing the person(s)	accountable for any of the	accountability contract	OU.IIPIOIO
	benchmark information.	accountable for any of the	Employment Functions. Define	provided .	
	For assessments	Employment Functions.	the person(s) with ultimate		
	conducted prior to 2020	Furthermore it has not formally	accountability within the factory.		
	benchmark numbers reflect	defined the person(s) with	•		
	the FLA's 2011 Workplace	ultimate accountability within the			
	Compliance Benchmarks.	factory.			

XX.13	Please refer to the assessment report for benchmark information. For assessments conducted prior to 2020 benchmark numbers reflect the FLA's 2011 Workplace Compliance Benchmarks.	The factory has not conducted management or internal reviews to ensure that policies and procedures are updated according to local laws and the FLA Workplace Code and Benchmarks across all Employment Functions.	Conduct management or internal reviews to ensure that policies and procedures are updated according to local laws and the FLA Workplace Code and Benchmarks across all Employment Functions.  Please also indicate the frequency of document review so that you are able to avoid such issue occurred again in the future.	factory stated: ""Build up guide catalogue of all the docs listing valid time for easy checking and updating. ????????????????????????????????????
XX.14	Please refer to the 35 assessment report for benchmark information. For assessments conducted prior to 2020 benchmark numbers reflect the FLA's 2011 Workplace Compliance Benchmarks.	The factory is missing all management functions on Retrenchment including Policy & Procedure Training Implementation Review Process and Communications & Worker Involvement.	1. Assign a factory manager responsible for Retrenchment. 2. Assign that person responsibility for creating Policy & Procedures around retrenchment in keeping with local laws and best practice. 3. Assign that person responsibility for providing training to relevant staff including HR Line Supervisors and other management. 4. Assign that person responsibility for Implementation and review of this process 5. Assign that person responsibility for Implementation and review of this process 5. Assign that person responsibility for communicating with workers and creating opportunities platforms and mediums for workers to be involved in this process and provide input and feedback to management.	Highrock states ""team Completed take the responsibility of management functions such as policy procedure training etc. "" management function structure provided. Hill: ??????????-20170816 - ??
XX.15	Please refer to the assessment report for benchmark information. For assessments conducted prior to 2020 benchmark numbers reflect the FLA's 2011 Workplace Compliance Benchmarks.	1. The factory does not provide specific training to managers and supervisors for any Employment Function. 2. The factory does not provide ongoing training to workers for any Employment Functions.	IA 02-10-2017  1. Appoint Person Responsible for Training. 2. Develop training materials for workers on Any Employment Function including Recruitment Hiring & Personnel Development; Compensation; Termination & Retrenchment; Industrial Relations; Workplace Conduct & Discipline; Grievance System; and Environmental Protection. 3. Provide training to workers. 4. Respond to questions.  SI 1. Appoint relevant HR and related personnel to be responsible for training and education within the factory. 2. Create a Training Policy Training Outline and Course Content that addresses ongoing training to workers on any Employment Function including Recruitment Hiring & Personnel Development; Compensation; Termination & Retrenchment; Industrial Relations; Workplace Conduct & Discipline; Grievance System; and Environmental Protection. 3. Roll out such training at least twice a year. 4. Include the same information	evidence of training plan Completed provided.

XX.16	Please refer to the assessment report for benchmark information. For assessments conducted prior to 2020 benchmark numbers reflect the FLA's 2011 Workplace Compliance Benchmarks.	1. The factory does not provide specific training to managers and supervisors for any Employment Function. 2. The factory does not provide ongoing training to workers for any Employment Functions.	Training (Macro) 1.1 02-10-2017 Details IA  1. Appoint Person Responsible for Training. 2. Develop training materials for supervisors for any employment function 3. Ensure that such training is provided. 4. Answer any questions.  SI 1. Train HR and related personnel responsible for training for supervisors. 2. Create a Training Policy Training Outline and Course Content that addresses employment functions during worker orientation and supervisor training. 3. Include in worker handbook for supervisors. 4. Include these changes in supervisor promotion orientation and on going training. 5. Employment functions will be reviewed to determine which needs to be prioritized for training. 5. Create system to monitor regular performance reviews.	Completed
XX.17	Please refer to the assessment report for benchmark information. For assessments conducted prior to 2020 benchmark numbers reflect the FLA's 2011 Workplace Compliance Benchmarks.	1. Workers do not receive a copy of the workplace rules during orientation or written documentation that substantiates all the issues covered in orientation. 2. The disciplinary procedures do not include the workers' right to have a third party witness present during imposition of the disciplinary action. 3. The records of disciplinary actions are maintained in a centralized file but not in workers' personnel	regular performance reviews.  6. Monitor implementation.  1. Create a written copy of 02-10-2017 workplace rules.  2. Assign responsibility to manager or HR staff member for providing such handbook to workers upon their hiring and induction.  3. Confirm this by making it part of their performance review.  4. The manager / HR person responsible it to keep a written record in the workers record that such handbook has been provided.	factory stated: ""Factory Completed post updated rules and regulations on bulletin board.Place hard copies free taken. ????????????????????????????????????
XX.18	Please refer to the 39 assessment report for benchmark information. For assessments conducted prior to 2020 benchmark numbers reflect the FLA's 2011 Workplace Compliance Benchmarks.	files.  1. Workers do not receive a copy of the workplace rules during orientation or written documentation that substantiates all the issues covered in orientation.  2. The disciplinary procedures do not include the workers' right to have a third party witness present during imposition of the disciplinary action.  3. The records of disciplinary actions are maintained in a centralized file but not in workers' personnel	Assign responsibility to a 02-10-2017 manager or other HR staff member who is to ensure that records of disciplinary actions are maintained in a centralized file as well as in workers' personnel files.  Build this into their performance review to ensure this is happening.	factory stated: ""Discuss Completed with workers to reach agreement regarding maintain the disciplinary actions in personnel files. ????????????????????????????????????
XX.19	Please refer to the 40 assessment report for benchmark information. For assessments conducted prior to 2020 benchmark numbers reflect the FLA's 2011 Workplace Compliance Benchmarks.	files.  1. Workers do not receive a copy of the workplace rules during orientation or written documentation that substantiates all the issues covered in orientation. 2. The disciplinary procedures do not include the workers' right to have a third party witness present during imposition of the disciplinary action. 3. The records of disciplinary actions are maintained in a centralized file but not in workers' personnel files.	Correct the disciplinary 02-10-2017 procedures to ensure that workers have the right to have a third party witness present during imposition of the disciplinary action.  Communicate these changes and train workers on the updated procedures.	evidence of updated Completed disciplinary procedure provided.