

FLA Assessment Corrective Action Plan

Summary of Corrective Actions Taken or Planned

Additional CAP Notes

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 reflect the FLA's 2011 Workplace Compliance Benchmarks.	1	The worker integration component is missing across all Employment Functions. This indicates that the factory has not established procedures to request and/or receive workers' input and feedback regarding the creation implementation and updating of its policies and procedures. Workers are neither systematically integrated nor consulted in decision-making processes.			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.	02-10-2017	training content and records provided.	Completed
C.6	All wages including payment for overtime shall be paid directly and in full within legally defined time limits. When no time limits are defined by law compensation shall be paid at least once a month.	3	<p>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 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.</p> <p>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 only contributes to the five types of social insurances based on the local minimum contribution</p>	<p>1. Provide all 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.</p> <p>2. Provide or pay out unused annual leave to resigned workers.</p> <p>3. Enhance training and worker communication on the sick leave policy so that workers are aware of their benefits.</p>		<p>1. As above explore ways the factory build payments into the Housing Provident Fund as part of the pay structure.</p> <p>2. Enroll all workers into the legally required Housing Provident Fund before the end of 2017.</p>	02-10-2017	factory stated: ""Housing provident fund is not within the obligatory insurance in factory located area. Seaking possible margin and dis. with workers to make it happen.????????????????? ????????.""	Completed

C.6	All wages including payment for overtime shall be paid directly and in full within legally defined time limits. When no time limits are defined by law compensation shall be paid at least once a month.	4	<p>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 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.</p> <p>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 only contributes to the five types of social insurances based on the local minimum contribution</p>	<p>1. Provide all 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.</p> <p>2. Provide or pay out unused annual leave to resigned workers.</p> <p>3. Enhance training and worker communication on the sick leave policy so that workers are aware of their benefits.</p>	02-10-2017	1. Determine how many workers do not have government-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-mandated insurance as well as commercial work-related injury insurance for workers ineligible for social insurance by the end of 2017. 3. Base contributions for social insurance on workers' actual wages.	receipt of social insurance provided	Completed
C.6	All wages including payment for overtime shall be paid directly and in full within legally defined time limits. When no time limits are defined by law compensation shall be paid at least once a month.	5	<p>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 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.</p> <p>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 only contributes to the five types of social insurances based on the local minimum contribution</p>	<p>1. Provide all 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.</p> <p>2. Provide or pay out unused annual leave to resigned workers.</p> <p>3. Enhance training and worker communication on the sick leave policy so that workers are aware of their benefits.</p>	02-10-2017	1. Explore ways the factory can increase social insurance contributions based on a worker's average monthly wage of the previous year. 2. Build this into the factory pay structure before the end of 2017.	factory stated: ""Current social insurance contribution conform to local insurance requirement and kept trying to upgrading the insurance base. Do annually review of the insurance base. ???????????????? ???????????????? ???????????????? ?????????????"	Completed

C.6	All wages including payment for overtime shall be paid directly and in full within legally defined time limits. When no time limits are defined by law compensation shall be paid at least once a month.	6	<p>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 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.</p> <p>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 only contributes to the five types of social insurances based on the local minimum contribution</p>	<p>1. Provide all 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.</p> <p>2. Provide or pay out unused annual leave to resigned workers.</p> <p>3. Enhance training and worker communication on the sick leave policy so that workers are aware of their benefits.</p>	<p>1. Provide or pay out unused annual leave to resigned workers.</p> <p>2. Establish a system so that when workers resign the factory pays them at the time for any and all unused annual leave.</p>	02-10-2017	photos of annual leave policy provided and factory stated: ""Creat supplementary terms of annual leave regulations stating clearly that workers will be paid with the last month wages for unused annual leave when resigned. The supplementary terms announced in the bulletin board and broasted in work place.1.????2016.11.14??? ?????????????????? ?????????????????? ??,2.???????????????? ??????????????"	Completed
C.6	All wages including payment for overtime shall be paid directly and in full within legally defined time limits. When no time limits are defined by law compensation shall be paid at least once a month.	7	<p>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 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.</p> <p>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 only contributes to the five types of social insurances based on the local minimum contribution</p>	<p>1. Provide all 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.</p> <p>2. Provide or pay out unused annual leave to resigned workers.</p> <p>3. Enhance training and worker communication on the sick leave policy so that workers are aware of their benefits.</p>	<p>3. Enhance training and worker communication on the sick leave policy so that workers are aware of their benefits.</p>	02-10-2017	factory stated: ""1. Factory listed the leagal benefits in sick leave policy. 2. Include the related policy in the induction training 3. Announce the leagal benefits to workers. 1.????????????????? ????????????;2.??????? ????????????;3.??????? ??????????????"	Completed

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.	8	<p>1. The factory does 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.</p> <p>2. The factory does not have any formal written policies or procedures on Environmental Protection.</p> <p>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.</p> <p>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 making an effort to reduce its</p>	Create a formal written policy and procedures on Environmental Protection.	02-10-2017	environmental policy provided. Factory stated that ""Arrange environment protection training. Add in annual training plan.????????????????? ??????????????????"".	Completed	
HOW.1.1	Employers shall comply with all national laws regulations and procedures concerning hours of work public holidays and leave.	26	<p>It was noted that the factory had obtained a written approval for adopting a Comprehensive 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.</p>	Ensure workers' working hours do not exceed the Comprehensive Working Hour System limit.	<p>1. Establish a plan to correctly monitor and maintain accurate working hours of workers.</p> <p>2. Identify those workers whose hours consistently exceed the working hour system.</p> <p>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.</p> <p>4. Report back on how the factory has taken steps to proactively address the excessive hours worked within the factory by year end 2017.</p>	02-10-2017	factory stated: ""Keep working on decreasing the OT time.????????????????? ?????????????????????? ??????????????????"".	Completed

XX.4	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.	9	<p>1. The factory does 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.</p> <p>2. The factory does not have any formal written policies or procedures on Environmental Protection.</p> <p>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.</p> <p>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 making an effort to reduce its</p>	Create a procedure to manage the factory's environmental impact to its surroundings and identify whether its on-site operations generate any negative environmental impacts. Train staff members responsible for environmental protection and have assigned HR or manager conduct periodic reviews.	02-10-2017	environmental policy provided. Factory stated that ""No harmful substance emission cause by production. Household disposal comply with rules & regulations.??".	Completed
XX.5	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.	10	<p>1. The factory does 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.</p> <p>2. The factory does not have any formal written policies or procedures on Environmental Protection.</p> <p>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.</p> <p>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 making an effort to reduce its</p>	Create and issue a statement of the factory management's general support of energy and water efficiency and a commitment to minimize impacts with respect to air emissions waste hazardous materials and other applicable environmental risks.	02-10-2017	environment policy provided.	Completed

XX.6	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.	11	<p>1. The factory does 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.</p> <p>2. The factory does not have any formal written policies or procedures on Environmental Protection.</p> <p>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.</p> <p>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 making an effort to reduce its</p>	Obtain the Environmental Protection Final Acceptance Check Report for their completed construction project. Update its Environmental Impact Report and Approval to reflect the factory name change which occurred in June 2013.	02-10-2017	Environmental Impact Report and Approval in progress	Completed	
HSE.1	Employers shall comply with all national laws regulations and procedures concerning health safety and the environment.	12	<p>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.</p> <p>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).</p> <p>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.</p> <p>4. The toilets in the factory are not clean or sanitized.</p> <p>5. While the factory has established a written lockout-tagout (LOTO) policy and procedures it has not created a list of equipment and</p>	<p>1. Install proper guards – including needle guards pulley guards and eye-protection shields – on all sewing machines.</p> <p>2. Keep the toilets clean and sanitized.</p>	<p>1. Install proper guards – including needle guards pulley guards and eye-protection shields – on all sewing machines.</p> <p>2. Provide training to relative workers to ensure this does not reoccur.</p>	02-10-2017	photo evidence provided.	Completed

HSE.1	Employers shall comply with all national laws regulations and procedures concerning health safety and the environment.	13	<p>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.</p> <p>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).</p> <p>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.</p> <p>4. The toilets in the factory are not clean or sanitized.</p> <p>5. While the factory has established a written lockout-tagout (LOTO) policy and procedures it has not created a list of equipment and</p>	<p>1. Install proper guards – including needle guards pulley guards and eye-protection shields – on all sewing machines.</p> <p>2. Keep the toilets clean and sanitized.</p>	Assign HR person to create a procedure to track all illnesses of workers and staff. Include in their KPIs the responsibility for maintaining daily records of staff illnesses.	02-10-2017	procedure provided.	Completed
HSE.1	Employers shall comply with all national laws regulations and procedures concerning health safety and the environment.	14	<p>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.</p> <p>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).</p> <p>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.</p> <p>4. The toilets in the factory are not clean or sanitized.</p> <p>5. While the factory has established a written lockout-tagout (LOTO) policy and procedures it has not created a list of equipment and</p>	<p>1. Install proper guards – including needle guards pulley guards and eye-protection shields – on all sewing machines.</p> <p>2. Keep the toilets clean and sanitized.</p>	<p>Assign responsibility for a staff member HR or manager to Keep the toilets clean and sanitized.</p> <p>Their KPI is to</p> <ul style="list-style-type: none"> - 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 bulletin boards and visuals) 	02-10-2017	toilet checklist provided.	Completed

HSE.1	Employers shall comply with all national laws regulations and procedures concerning health safety and the environment.	15	<p>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.</p> <p>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).</p> <p>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.</p> <p>4. The toilets in the factory are not clean or sanitized.</p> <p>5. While the factory has established a written lockout-tagout (LOTO) policy and procedures it has not created a list of equipment and</p>	<p>1. Install proper guards – including needle guards pulley guards and eye-protection shields – on all sewing machines.</p> <p>2. Keep the toilets clean and sanitized.</p>	Communicate with the relevant local officials or Government department and obtain an assessment of the current conditions of Occupational Disease Hazards as legally required.	02-10-2017	Assessment of Current Condition of Occupational Disease Hazards in progress	Completed
HSE.1	Employers shall comply with all national laws regulations and procedures concerning health safety and the environment.	16	<p>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.</p> <p>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).</p> <p>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.</p> <p>4. The toilets in the factory are not clean or sanitized.</p> <p>5. While the factory has established a written lockout-tagout (LOTO) policy and procedures it has not created a list of equipment and</p>	<p>1. Install proper guards – including needle guards pulley guards and eye-protection shields – on all sewing machines.</p> <p>2. Keep the toilets clean and sanitized.</p>	Communicate with the relevant local officials or local Government Department and obtain the Report on Inspection and Acceptance of Completed Construction Project for the four main factory buildings (built in 2007) and for the temporary building that is situated between production Buildings 1 and 2 (built in 2014).	02-10-2017	inspection reports provided.	Completed

HSE.1	Employers shall comply with all national laws regulations and procedures concerning health safety and the environment.	17	<p>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.</p> <p>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).</p> <p>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.</p> <p>4. The toilets in the factory are not clean or sanitized.</p> <p>5. While the factory has established a written lockout-tagout (LOTO) policy and procedures it has not created a list of equipment and</p>	<p>1. Install proper guards – including needle guards pulley guards and eye-protection shields – on all sewing machines.</p> <p>2. Keep the toilets clean and sanitized.</p>	Create a list of equipment and 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.	02-10-2017	training content and attendance provided.	Completed
HSE.1	Employers shall comply with all national laws regulations and procedures concerning health safety and the environment.	18	<p>1. The fire alarm system does not have a backup battery.</p> <p>2. Seven fire extinguishers (about 10%) in the office building are placed directly on the ground instead of mounted as required.</p> <p>3. Two fire alarm buttons are partially blocked by production materials one each in the warehouse and sewing workshop.</p> <p>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.</p> <p>5. The evacuation passages for about 5% of the sewing workers are completely blocked by production materials.</p> <p>6. The factory's emergency evacuation plan is incomplete as the location of first aid kits are not shown on the plan.</p> <p>7. The emergency alarm is not inspected or tested regularly.</p> <p>8. The fire brigade does not have the appropriate personal protective equipment (PPE) to fight fires (such as a breathing apparatus).</p>	<p>1. Install a backup battery on the fire alarm system in the factory.</p> <p>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.</p> <p>3. Move materials away from the fire alarm buttons and evacuation passages and keep them free of obstructions. Regularly monitor for compliance.</p> <p>4. Ensure that all emergency exits remain unlocked during working hours.</p> <p>5. Mark the location of fire alarms on the emergency plan maps.</p> <p>6. Provide the fire brigade with the necessary PPE and train them on its use.</p>	<p>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.</p> <p>2. Assign these staff to provide regular training on fire safety (minimum every 6 months) to workers and management.</p> <p>3. Assign these staff to provide monthly internal monitoring system of all Health and Safety issues including fire systems.</p> <p>4. Assign these staff to create a tool or checklist to follow and to complete this every month.</p> <p>5. Provide the fire brigade with the necessary PPE and train them on its use.</p>	02-10-2017	photo evidence provided. Factory stated that "PPE provided and arrange training in annually fire-drill. ?????????????????????? ??????????????????????"	Completed

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

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

HSE.1	Employers shall comply with all national laws regulations and procedures concerning health safety and the environment.	23	<div>1. The fire alarm system does not have a backup battery.</div> <div>2. Seven fire extinguishers (about 10%) in the office building are placed directly on the ground instead of mounted as required.</div> <div>3. Two fire alarm buttons are partially blocked by production materials one each in the warehouse and sewing workshop.</div> <div>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.</div> <div>5. The evacuation passages for about 5% of the sewing workers are completely blocked by production materials.</div> <div>6. The factory's emergency evacuation plan is incomplete as the location of first aid kits are not shown on the plan.</div> <div>7. The emergency alarm is not inspected or tested regularly.</div> <div>8. The fire brigade does not have the appropriate personal protective equipment (PPE) to fight fires (such as a breathing apparatus).</div>	<div>1. Install a backup battery on the fire alarm system in the factory.</div> <div>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.</div> <div>3. Move materials away from the fire alarm buttons and evacuation passages and keep them free of obstructions. Regularly monitor for compliance.</div> <div>4. Ensure that all emergency exits remain unlocked during working hours.</div> <div>5. Mark the location of fire alarms on the emergency plan maps.</div> <div>6. Provide the fire brigade with the necessary PPE and train them on its use.</div>	<div>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.</div> <div>2. Assign these staff to provide regular training on fire safety (minimum every 6 months) to workers and management.</div> <div>3. Assign these staff to provide monthly internal monitoring system of all Health and Safety issues including fire systems.</div> <div>4. Assign these staff to create a tool or checklist to follow and to complete this every month.</div> <div>5. Mark the location of fire alarms on the emergency plan maps.</div>	02-10-2017	updated the plan provided.	Completed
HSE.1	Employers shall comply with all national laws regulations and procedures concerning health safety and the environment.	24	<div>1. The fire alarm system does not have a backup battery.</div> <div>2. Seven fire extinguishers (about 10%) in the office building are placed directly on the ground instead of mounted as required.</div> <div>3. Two fire alarm buttons are partially blocked by production materials one each in the warehouse and sewing workshop.</div> <div>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.</div> <div>5. The evacuation passages for about 5% of the sewing workers are completely blocked by production materials.</div> <div>6. The factory's emergency evacuation plan is incomplete as the location of first aid kits are not shown on the plan.</div> <div>7. The emergency alarm is not inspected or tested regularly.</div> <div>8. The fire brigade does not have the appropriate personal protective equipment (PPE) to fight fires (such as a breathing apparatus).</div>	<div>1. Install a backup battery on the fire alarm system in the factory.</div> <div>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.</div> <div>3. Move materials away from the fire alarm buttons and evacuation passages and keep them free of obstructions. Regularly monitor for compliance.</div> <div>4. Ensure that all emergency exits remain unlocked during working hours.</div> <div>5. Mark the location of fire alarms on the emergency plan maps.</div> <div>6. Provide the fire brigade with the necessary PPE and train them on its use.</div>	<div>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.</div>	02-10-2017	photo of extinguisher provided. Factory stated that ""Extinguishers and extinguisher boxes installed as per legal requirement Noc. 24 2016. ??2016.11.24?????????? ??????????????????"	Completed

HSE.1	Employers shall comply with all national laws regulations and procedures concerning health safety and the environment.	25	<p>1. The fire alarm system does not have a backup battery.</p> <p>2. Seven fire extinguishers (about 10%) in the office building are placed directly on the ground instead of mounted as required.</p> <p>3. Two fire alarm buttons are partially blocked by production materials one each in the warehouse and sewing workshop.</p> <p>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.</p> <p>5. The evacuation passages for about 5% of the sewing workers are completely blocked by production materials.</p> <p>6. The factory's emergency evacuation plan is incomplete as the location of first aid kits are not shown on the plan.</p> <p>7. The emergency alarm is not inspected or tested regularly.</p> <p>8. The fire brigade does not have the appropriate personal protective equipment (PPE) to fight fires (such as a breathing apparatus).</p>	<p>1. Install a backup battery on the fire alarm system in the factory.</p> <p>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.</p> <p>3. Move materials away from the fire alarm buttons and evacuation passages and keep them free of obstructions. Regularly monitor for compliance.</p> <p>4. Ensure that all emergency exits remain unlocked during working hours.</p> <p>5. Mark the location of fire alarms on the emergency plan maps.</p> <p>6. Provide the fire brigade with the necessary PPE and train them on its use.</p>	3. Move materials away from the fire alarm buttons and evacuation passages and keep them free of obstructions. Regularly monitor for compliance.	02-10-2017	photo of cleared area provide. Factory stated that ""Monitors of each line be responsible for the semi-finished products' stacking. No stacking at alarm area. ???????????????????? ???????????????????? ??".	Completed
HOW.1.1	Employers shall comply with all national laws regulations and procedures concerning hours of work public holidays and leave.	27	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 fingerprint) and about 80% of workers did not use the fingerprinting time record system during lunch break. This is contrary to the provided records which show all workers using the fingerprinting machine to record their attendance 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.	Maintain accurate and authentic working hours and payroll records. Ensure that all records are available to assessors upon request.	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.	02-10-2017	record of working hours provided.	Completed

XX.11	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.	32	<p>1. The factory has not created written job descriptions for any of the positions.</p> <p>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.</p> <p>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.</p> <p>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 Benchmarks.</p>	Create written policies and procedures outlining the process for performance reviews and conduct regular performance reviews.	02-10-2017	samples of performance reviews provided.	Completed
XX.7	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.	28	<p>1. Management did not provide any office space or other facilities for worker representatives to meet.</p> <p>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 has the responsibility to consult</p>	Explore ways to incorporate and 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.	02-10-2017	evidence of Freedom of Association policy provided and factory stated: ""Factory to build up compliant procedure and Highrock FLA team do random snap check.?????????????????? ?????????????????"m	Completed

XX.8	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.	29	<p>1. Management did not provide any office space or other facilities for worker representatives to meet.</p> <p>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 has the responsibility to consult</p>	Provide office space or other facilities for worker representatives to meet.	02-10-2017	photos of office provided.	Completed
XX.10	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.	31	<p>1. The factory has not created written job descriptions for any of the positions.</p> <p>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.</p> <p>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.</p> <p>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 Benchmarks.</p>	Create written job descriptions for all positions.	02-10-2017	samples of job descriptions provided .	Completed

XX.12	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.	33	<p>1. The factory has not created written job descriptions for any of the positions.</p> <p>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.</p> <p>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.</p> <p>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 Benchmarks.</p>	Look for ways to hire disabled workers as appropriate. Identify what positions are suitable for disabled workers. Include in advertisements for job opportunities that candidates with disabilities are welcome to apply.	02-10-2017	receipt of disable workers insurance provided.	Completed
XX.9	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.	30	<p>1. The factory has not created written job descriptions for any of the positions.</p> <p>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.</p> <p>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.</p> <p>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 Benchmarks.</p>	Create policies and procedures regarding workers' career paths and Personnel Development; create specific career paths or skill development plans for workers. Please also integrate workers' thoughts when you establish policy and procedure. That would help you in the following training.	02-10-2017	sample of skill development plan provided.	Completed
XX.2	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.	2	The factory has not formally defined in writing the person(s) accountable for any of the Employment Functions. Furthermore it has not formally defined the person(s) with ultimate accountability within the factory.	Define in writing the person(s) accountable for any of the Employment Functions. Define the person(s) with ultimate accountability within the factory.	02-10-2017	job description and accountability contract provided .	Completed

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.	34	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.	02-10-2017	factory stated: ""Build up guide catalogue of all the docs listing valid time for easy checking and updating. ?????????????????? ??????????????""	Completed
XX.14	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.	35	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 communicating with workers and creating opportunities platforms and mediums for workers to be involved in this process and provide input and feedback to management.	02-10-2017	Highrock states ""team take the responsibility of management functions such as policy procedure training etc. "" management function structure provided. Hill: ??????????-20170816 - ??	Completed
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.	36	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 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 in the employee handbook	02-10-2017	evidence of training plan provided.	Completed

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.	37	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 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. 6. Monitor implementation.	02-10-2017		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.	38	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.	1. Create a written copy of 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.	02-10-2017	factory stated: ""Factory post updated rules and regulations on bulletin board.Place hard copies free taken. ????????????????? ????????????????? ?????????????""	Completed
XX.18	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.	39	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.	Assign responsibility to a 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.	02-10-2017	factory stated: ""Discuss with workers to reach agreement regarding maintain the disciplinary actions in personnel files. ????????????????? ????????????????? ?????????????""	Completed
XX.19	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.	40	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 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.	02-10-2017	evidence of updated disciplinary procedure provided.	Completed