



2008

FAIR LABOR ASSOCIATION INDEPENDENT EXTERNAL MONITORING REPORT

COMPANY: Umbro
COUNTRY: Mexico
FACTORY CODE: 630050771G
MONITOR: Accordia Global Compliance
Group
AUDIT DATE: October 13 – 14, 2008
PRODUCTS: Football Soccer Uniforms
PROCESSES: Sewing, Reviewing
NUMBER OF WORKERS: 4

FLA Comment: This report was submitted with a corresponding corrective action plan to the FLA and was reviewed by FLA staff. In an effort to improve the effectiveness of remediation, the FLA has provided feedback and recommendations to the company. The FLA has not yet received a response from the company. Therefore, the report is posted in its current state and will be updated once a finalized report has been received.



CONTENTS:

Wages, Benefits and Overtime Compensation: Holidays, Leave, Legal Benefits and Bonuses 3
Wages, Benefits and Overtime Compensation: General Compliance Wages, Benefits and Overtime
Compensation 4
Wages, Benefits and Overtime Compensation: Record Maintenance 5
Wages, Benefits and Overtime Compensation: Pay Statement 6
Forced Labor: Employment Records..... 7
Harassment or Abuse: Discipline/Progressive Discipline..... 8
Harassment or Abuse: Discipline/Written Disciplinary System 9
Child Labor: Proof of Age Documentation 10
Code Awareness:..... 11
Code Awareness:..... 12
Code Awareness:..... 13
Miscellaneous: Possible Homework 14
Health and Safety: General Compliance Health and Safety 15
Health and Safety: Written Health and Safety Policy 16
Health and Safety: Evacuation Requirements and Procedure..... 17
Health and Safety: Safety Equipment and First Aid Training..... 19
Health and Safety: Personal Protective Equipment..... 20
Health and Safety: Chemical Management and Training 21
Health and Safety: Material Safety Data Sheets/Worker Access and Awareness..... 23
Health and Safety: Ventilation/Electrical/Facility Installation and Maintenance..... 24
Health and Safety: Machinery Maintenance and Worker Training 25
Health and Safety: Sanitation in Factory Facilities..... 26
Health and Safety: Drinking Water 27
Hours of Work: Time Recording System 28



Wages, Benefits and Overtime Compensation: Holidays, Leave, Legal Benefits and Bonuses

WBOT.5 Employers shall provide all legally mandated holidays, leave, benefits and bonuses, such as official holidays, annual leave, sick leave, severance payments and 13th month payments, to all eligible workers within legally defined time periods. In addition, all leave and bonuses shall be calculated correctly. (S)

Noncompliance

Explanation: During document review it was observed that production workers are not registered with Social Security (IMSS); as a result, no deductions were evident. However, owners of factory were registered.

Plan Of Action: Employer is required to make contributions to Mexican Federal Social Security (IMSS), Living Quarters Fund (INFONAVIT) and Retirement Savings System (SAR), as well as payments for vacations, vacation premiums, and yearend bonuses. These benefits represent an average of 29% of the paid salary. Thus, salary is 129% of what you state as base salary. Employer should register and maintain employees with Mexican Institute of Social Security (medical care). If not, employer will be liable for medical care and will also still owe social security. Employer should also ensure all employees fully understand their rights with regards to social security. This shall be communicated in a training class scheduled by the factory and reiterated on an annual basis, as well as be included in labor contract.

Deadline Date:

Action Taken:

Plan Complete:

Plan Complete Date:



Wages, Benefits and Overtime Compensation: General Compliance Wages, Benefits and Overtime Compensation

WBOT.1 Employers shall comply with all local laws, regulations and procedures concerning the payment of wages and benefits, including overtime compensation. In any case where laws and the FLA Code are contradictory, the standard that provides the greatest protection for workers shall apply. Where provisions are lacking, employers shall take measures to reasonably accommodate matters concerning the payments of wages and benefits, including overtime compensation. (S)

Noncompliance

Explanation: 1. New workers have not received a comprehensive pay stub when payroll is issued.

2. During document review it was observed that production workers are not registered with IMSS; thusly, no deductions were evident. Factory owners, however, were registered.

Plan Of Action: 1. Factory shall issue workers comprehensive pay stubs when payroll is issued; stub to be included upon employment. Employers shall make every reasonable effort to ensure workers understand wages, including calculation of wages, incentives systems, benefits and bonuses they are entitled to in factory and under applicable laws. Employers shall communicate orally and in writing to all workers all relevant information in the local language spoken by the worker. Worker should sign to confirm they understand.

2. Employer is required to make contributions to IMSS, INFONAVIT and SAR, as well as payments for vacations, vacation premiums, and yearend bonuses. These benefits represent an average of 29% of the paid salary. Thus, salary is 129% of what you state as base salary. Employer should register and maintain employees with IMSS (medical care). If not, employer will be liable for medical care and will also still owe social security. Employer should also ensure all employees fully understand their rights with regards to social security. This shall be communicated in a training class scheduled by the factory and reiterated on an annual basis, as well as be included in labor contract.

Deadline Date:

Action Taken:

Plan Complete:



**Plan
Complete
Date:**

Wages, Benefits and Overtime Compensation: Record Maintenance

WBOT.21 Employers shall ensure that all legally required payroll documents, journals and reports are available, complete, accurate and up-to-date. (P)

Noncompliance

Explanation: No time records were available to review prior to September 1, 2008.

Plan Of Action: The factory shall maintain accurate and consistent records for monitoring pay and working hours, this includes ensuring all time sheets are kept up to date, clocking systems tally with registers, delivery notes, needle logs inspection, production reports cleaning records, etc. All information must match from employee to employee; to determine code compliance, it is necessary that factories have available, complete, accurate and up to date records. Factories are required to implement a clocking or time card system to log all employees' timings of breaks, starts and finishes.

**Deadline
Date:**

**Action
Taken:**

**Plan
Complete:**

**Plan
Complete
Date:**



Wages, Benefits and Overtime Compensation: Pay Statement

WBOT.26 Employers shall provide workers a pay statement each pay period, which shall show earned wages, wage calculations, regular and overtime pay, bonuses, all deductions and final total wage. (P)

Noncompliance

- Explanation:**
1. The new workers have not received a comprehensive pay stub when payroll is issued.
 2. No pay stubs were available to review prior to September 1, 2008.
 3. The pay stubs do not specify the number of hours worked by the employee.

- Plan Of Action:**
1. The factory shall issue workers comprehensive pay stub when payroll is issued; stub to be included upon employment.
 - 2 & 3. The factory shall maintain accurate and consistent records for monitoring pay and working hours, this includes ensuring all time sheets are kept up to date, clocking systems tally with registers, delivery notes, needle logs inspection, production reports and cleaning records. All information must match from employee to employee; to determine code compliance, it is necessary that factories have available, complete, accurate and up to date records. Factories are required to implement a clocking or time card system to log all employees' timings of breaks, starts and finishes.

Deadline

Date:

Action

Taken:

Plan

Complete:

Plan

Complete

Date:



Forced Labor: Employment Records

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

Noncompliance

Explanation: 1. Individual labor contracts are established on a temporary basis without legal justification.

2. Some information is not present on individual labor contracts, such as employee name and the start date of the labor relationship between employee and employer.

3. Individual labor contracts were not signed by employer.

4. Employees have not received an original copy of individual labor contract.

5. All employees are registered as training workers.

6. 2 of 4 requested employee files were available for review.

7. No copies of job applications are present in the employee files.

Plan Of Action: 1 - 7. Labor contract is an agreement between employee and employer; it must be signed and agreed with all employees on record. Contract establishes employment relationship and clarifies the rights and obligations of both parties. Factory shall sign individual labor contract to establish the employment relationship.

Terms and conditions of employment: Subjects employment contract should cover: contracted hours of work, start/finish times; how many days of holiday and sick pay entitlement; overtime rates; bonus structure: performance related bonus schemes and attendance bonus; transport arrangements; dormitory facility info/costs; notice period; penalty payments if employees leave before notice period; wage structure: basic rates and deductions; wage payment method: bank account, cash, check; monthly/weekly date of payment; names; and relevant contact details. The agreement shall be made widely available for every employee throughout their time with the company. If employee is on a temporary contract and changed to permanent, labor contract shall change accordingly, listing altered benefits according to local labor union.

Deadline Date:

Action Taken:

Plan
Complete:

Plan
Complete
Date:

Harassment or Abuse: Discipline/Progressive Discipline

H&A.2 Employers shall have a written system of progressive discipline (e.g., a system of maintaining discipline through the application of escalating disciplinary action moving, for instance, from verbal warnings to written warnings to suspension and finally to termination). Any exceptions to this system (e.g., immediate termination for gross misconduct, such as theft or assault) shall also be in writing and clearly communicated to workers. (P)

Noncompliance

Explanation: Facility lacks a written disciplinary system that would include procedures and practices to be followed by company and employees.

Plan Of Action: Factory is required to implement a fair disciplinary system. Physical abuse, the threat of physical abuse, sexual or other harassment, verbal abuse or other forms of intimidation shall not be used by law. Factory shall communicate the fair disciplinary system, including verbal and written warnings, warning letters for late arrival to work, etc. This policy shall be communicated upon employment and employee shall agree and sign agreement accordingly.

Deadline
Date:

Action
Taken:

Plan
Complete:

Plan
Complete
Date:

Harassment or Abuse: Discipline/Written Disciplinary System

H&A.5 Employers shall maintain a system of written disciplinary rules, procedures and practices. Disciplinary rules, procedures and practices shall be clearly communicated to all workers. (P)

Noncompliance

Explanation: Facility lacks a written progressive disciplinary system.

Plan Of Action: Factory is required to implement a fair disciplinary system, Physical abuse, the threat of physical abuse, sexual or other harassment, verbal abuse or other forms of intimidation shall not be used by law. Factory shall communicate the fair disciplinary system, including verbal and written warnings, warning letters for late arrival to work, etc. Policy shall be communicated upon employment; employee shall agree and sign accordingly. System shall include a log of all disciplinary action taken against an employee.

Deadline Date:

Action Taken:

Plan Complete:

Plan Complete Date:



Child Labor: Proof of Age Documentation

CL.3 Employers shall collect and maintain all documentation necessary to confirm and verify date of birth of all workers, such as birth certificates. In addition, the employers shall take reasonable measures to ensure such documentation is complete and accurate. (P)

Noncompliance

Explanation: No copies of birth certificates were present in the employee files.

Plan Of Action: Upon employment, employer is required to officially verify a worker's age by using one of several methods, one of which is by reviewing birth certificate, making a copy to keep in employee file and returning the original to employee. This information shall be included in employment manual and communicated to all relevant personnel staff.

Deadline

Date:

Action

Taken:

Plan

Complete:

Plan

Complete

Date:



Code Awareness:

GEN.1 Establish and articulate clear, written workplace standards. Formally convey those standards to Company factories as well as to licensees, contractors and suppliers.

Noncompliance

Explanation: There is no evidence that company has conveyed, established and articulated clear, written workplace standards to contractor.

Plan Of Action: Upon signing Umbro Manufacturing Authorization Agreement (MAA), factory is required to read and acknowledge brand code of conduct standards. Code required to be posted in local language around facility in all main areas. It is also licensee's responsibility to enforce code of conduct accordingly. Factory has not yet received an internal monitoring visit due to no SMETA audit conducted yet. Normal Umbro procedure states factory will receive internal training in remediation and compliance during authorization process.

Deadline

Date:

Action

Taken:

Plan

Complete:

Plan

Complete

Date:

Code Awareness:

GEN.2 Ensure that all Company factories as well as contractors and suppliers inform their employees about the workplace standards orally and through the posting of standards in a prominent place (in the local languages spoken by employees and managers) and undertake other efforts to educate employees about the standards on a regular basis.

Noncompliance

Explanation: 1. FLA Code of Conduct is not posted in factory.

2. No workers or members of management have received training regarding local obligations or guidelines under the FLA Code of Conduct.

3. Company has not communicated formally any information about FLA guidelines to employees and management.

4. There is no evidence that company sends compliance staff or designated service providers to assess the company for compliance.

Plan Of Action: Upon signing Umbro MAA, factory is required to read and acknowledge brand code of conduct standards. Code is required to be posted in local language around facility in all main areas. It is also licensee's responsibility to enforce code of conduct accordingly. Factory has not yet received an internal monitoring visit due to no SMETA audit conducted yet. Normal Umbro procedure states that factory will receive internal training in remediation and compliance during authorization process.

Deadline Date:

Action Taken:

Plan Complete:

Plan Complete Date:

Code Awareness:

GEN.3 Develop a secure communications channel, in a manner appropriate to the culture and situation, to enable Company employees and employees of contractors and suppliers to report to the Company on noncompliance with the workplace standards, with security that they shall not be punished or prejudiced for doing so.

Noncompliance

- Explanation:**
1. There is no evidence that the company has taken steps to encourage the factory to establish internal grievance procedures.
 2. There is no noncompliance reporting mechanism in place allowing factory workers to contact the company in a confidential manner, in order to address workplace problems.
 3. There is no evidence showed to auditor regarding a non-retaliation policy for workers through a noncompliance reporting mechanism.

- Plan Of Action:**
1. Factory does not fully understand freedom of association (FOA). Management needs to be educated so that they fully understand the need for collective bargaining and FOA within factory for workers' benefit. Employees have the right to elect representatives of their organizations and to conduct activities without contractor interference. Thus, contractor will not interfere with their right to freely associate by controlling such groups' committees and forces; all employees should receive full training giving full understanding of their right to freely associate. Contractor and employees must honor in good faith the terms of any signed collective bargaining agreement (CBA). Employees must be able to raise issues to management concerning compliance with CBA without retaliation.
 2. Develop secure reporting channel and announce it to workers; then factory should develop complaint handling procedure, including process, report, monitor, report.
 3. All workers should know their rights, how to report and how they get the reply. 3rd party or labor representatives should participate in all follow up of complaints and grievances. Regular updates to all workers shall also be provided; however, certain type of grievances should be replied to in a secure way.

**Deadline
Date:**

**Action
Taken:**

**Plan
Complete:**

**Plan
Complete
Date:**

Miscellaneous: Possible Homework

MISC.2 Possible Homework

Noncompliance

Explanation: One worker occasionally completes home work and is paid based on the number of pieces completed.

**Plan Of
Action:** Umbro requires employers of homeworkers to register homeworker officially, as wages for work done at home should not be less than wages for similar work in facility. Umbro also requests homeworkers paid for mandatory weekly rest day and benefit from annual leave. Labor inspectors have responsibility of monitoring compliance with labor standards on homework.

**Deadline
Date:**

**Action
Taken:**

**Plan
Complete:**

**Plan
Complete
Date:**

Health and Safety: General Compliance Health and Safety

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

Noncompliance

Explanation: 1. No Health and Safety Committee has been established at facility.

2. No medical or accident records are being maintained at facility.

Plan Of Action: Steps should be taken in order to prevent fire and personal injury. Factory shall appoint a responsible employee to ensure that H&S policy is enforced and that all areas of the policy are covered, areas such as:

a) Employers are required to develop, maintain and regularly review written H&S policy;

b) Compliance with legal minimum H&S standards, regulations, procedures (fire safety, PPE, safety equipment, chemical handling, storage, toilet hygiene, drinking water);

c) MSDS: clearly communicate them to workers, post in all chemical storage areas;

d) First aid: outlining H&S management procedures, responsibilities, rights, duties of worker management and designated personnel, including regular medical examinations where chemicals are used.

e) Safety training: should encourage workers to use PPE, instruct them on reasons for it and how to use it properly (fire fighting equipment should not be blocked by materials, production machinery, emergency exits, doorways and stairwells or workstations). This shall then be communicated to all workers in the local language or languages.

f) Maintenance equipment: should be clearly marked with regular inspection sheet showing all requirements and load limits, weight capacities and kept up to date.

g) A fully trained first aid person should always be available in factory; factory shall make all workers aware of the person's name and location.

Deadline

Date:

Action

Taken:

Plan

Complete:

**Plan
Complete
Date:**

Health and Safety: Written Health and Safety Policy

H&S.3 Employers are required to develop, maintain and regularly review a written health and safety policy. The policy must, at the very least, be aimed at complying with legal minimum safety and health standards, regulations and procedures. (P)

Noncompliance

Explanation: Facility has not developed and implemented a written H&S policy.

Plan Of Action: Steps should be taken in order to prevent fire and personal injury. Factory shall appoint a responsible employee to ensure that H&S policy is enforced and all areas of the policy are covered, areas such as:

- a) Employers are required to develop, maintain and regularly review written H&S policy;
- b) Compliance with legal minimum H&S standards, regulations, procedures (fire safety, PPE, safety equipment, chemical handling, storage, toilet hygiene, drinking water);
- c) MSDS: clearly communicate them to workers, post in all chemical storage areas;
- d) First aid: outlining H&S management procedures, responsibilities, rights, duties of worker management and designated personnel, including regular medical examinations where chemicals are used.
- e) Safety training: should encourage workers to use PPE and instruct them on reasons for it and how to use it properly (fire fighting equipment should not be blocked by materials, production machinery, emergency exits, doorways, stairwells or workstations). This shall then be communicated to all workers in the local language or languages.
- f) Maintenance equipment: should be clearly marked with regular inspection sheet showing all requirements and load limits, weight capacities and kept up to date.
- g) A fully trained first aid person should always be available in the factory; factory shall make all workers aware of the person's name and location.

Deadline

Date:

Action

Taken:

Plan

Complete:

Plan

Complete

Date:

Health and Safety: Evacuation Requirements and Procedure

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

Noncompliance

- Explanation:**
1. No fire and evacuation drill has been performed and documented.
 2. No evacuation procedures have been established.
 3. Evacuation plans have not been posted in public places of the factory.
 4. Aisles were obstructed with work in process and sewing machine units.
 5. The emergency exit lacked an emergency light and the door opened inwards.
 6. One extinguisher was stored directly on the floor and another was blocked.
 7. All extinguishers were expired.
 8. No extinguishers available for different categories of fire; only CO2 units available.
 9. No smoke detector has been installed.



Plan Of Action: 1 – 8. As well as fully working fire equipment, extensive training to workers required for fire safety, to enable them to react quickly. Evacuation routes, gathering areas, fire safety, fire extinguishers, exit signs, other equipment should be checked by official external office on regular basis. Evacuation plan and regular evacuation drills shall be conducted, maintained on annual basis. Provide fire safety management program to include written fire prevention plan. All will be clearly outlined, including emergency lights (all must be in working order); each aspect must be tested on a regular basis.

Deadline Date:

Action Taken:

Plan Complete:

Plan Complete Date:

Health and Safety: Safety Equipment and First Aid Training

H&S.10 All safety and medical equipment (such as fire fighting equipment, first aid kits, etc.) shall be available in sufficient numbers throughout the factory, maintained and stocked as prescribed and easily accessible to workers. A sufficient number of workers shall be trained in first aid and fire fighting techniques. (S)

Noncompliance

Explanation: 1. No training has been provided for the First Aid Brigade.

2. No training has been provided for the Fire Fighting Brigade.

3. Medicine in the first aid kit was expired.

Plan Of Action: Full official training must be provided for each of the above areas, qualifications must be posted and be made available in personnel file at all times, names of first aid workers and Fire Fighting Brigade shall be posted so all employees are aware of who to contact in case of an emergency.

Deadline

Date:

Action

Taken:

Plan

Complete:

Plan

Complete

Date:

Health and Safety: Personal Protective Equipment

H&S.11 Workers shall be provided with effective and all necessary personal protective equipment (such as gloves, eye protection, hearing protection, respiratory protection, etc.) to prevent unsafe exposure (such as inhalation or contact with solvent vapors, noise, dust, etc.) to health and safety hazards, including medical waste. (S)

Noncompliance

Explanation: Anti-fatigue mats have not been provided for those employees who work in standing positions for long periods of time.

Plan Of Action: Steps should be taken in order to prevent fire and personal injury. Factory shall appoint a responsible employee to ensure that H&S policy is enforced and all areas of the policy are covered, areas such as:

- a) Employers are required to develop, maintain and regularly review written H&S policy;
- b) Compliance with legal minimum H&S standards, regulations, procedures (fire safety, PPE, safety equipment, chemical handling, storage, toilet hygiene, drinking water);
- c) MSDS: clearly communicate them to workers, post in all chemical storage areas;
- d) First aid: outlining H&S management procedures, responsibilities, rights, duties of worker management and designated personnel, including regular medical examinations where chemicals are used.
- e) Safety training: should encourage workers to use PPE and instruct them on reasons for it and how to use it properly (fire fighting equipment should not be blocked by materials, production machinery, emergency exits, doorways and stairwells or workstations). This shall then be communicated to all workers in the local language or languages.
- f) Maintenance equipment: should be clearly marked with regular inspection sheet showing all requirements and load limits, weight capacities and kept up to date.

Deadline Date:

Action Taken:

Plan Complete:

**Plan
Complete
Date:**

Health and Safety: Chemical Management and Training

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

Noncompliance

Explanation: The chemical containers were located adjacent to the stereo soundsystem, rather than in a designated chemical storage area.

Plan Of Action: Steps should be taken in order to prevent fire and personal injury. Factory shall appoint a responsible employee to ensure that H&S policy is enforced and all areas of the policy are covered, areas such as:

- a) Employers are required to develop, maintain and regularly review written H&S policy;
- b) Compliance with legal minimum H&S standards, regulations, procedures (fire safety, PPE, safety equipment, chemical handling, storage, toilet hygiene, drinking water);
- c) MSDS: clearly communicate them to workers, post in all chemical storage areas;
- d) First aid: outlining H&S management procedures, responsibilities, rights, duties of worker management and designated personnel, including regular medical examinations where chemicals are used.
- e) Safety training: should encourage workers to use PPE and instruct them on reasons for it and how to use it properly (fire fighting equipment should not be blocked by materials, production machinery, emergency exits, doorways and stairwells or workstations). This shall then be communicated to all workers in the local language or languages.
- f) Maintenance equipment: should be clearly marked with regular inspection sheet showing all requirements and load limits, weight capacities and kept up to date.



**Deadline
Date:**

**Action
Taken:**

**Plan
Complete:**

**Plan
Complete
Date:**

Health and Safety: Material Safety Data Sheets/Worker Access and Awareness

H&S.14 Material Safety Data Sheets (MSDS) for all chemicals used in the factory must be available at the usage and storage sites of the chemicals, in the local language and the language(s) spoken by workers, if different from the local language. Workers shall have free access to MSDS. (P)

Noncompliance

Explanation: During factory tour it was observed that chemical containers with oil not labeled and lacked MSDS sheets.

Plan Of Action: Steps should be taken in order to prevent fire and personal injury. Factory shall appoint a responsible employee to ensure that H&S policy is enforced and all areas of the policy are covered, areas such as:

- a) Employers required to develop, maintain and regularly review written H&S policy;
- b) Compliance with legal minimum H&S standards, regulations, procedures (fire safety, PPE, safety equipment, chemical handling, storage, toilet hygiene, drinking water);
- c) MSDS: clear communicate them to workers, post in all chemical storage areas;
- d) First aid: outlining H&S management procedures; responsibilities, rights, duties of worker management and designated personnel, including regular medical examinations where chemicals are used.
- e) Safety training: should encourage workers to use PPE and instruct them on reasons for it and how to use it properly (fire fighting equipment should not be blocked by materials, production machinery, emergency exits, doorways and stairwells or workstations). This shall then be communicated to all workers in the local language or languages.
- f) Maintenance equipment: should be clearly marked with regular inspection sheet showing all requirements and load limits, weight capacities and kept up to date.

Deadline

Date:

Action

Taken:

Plan

Complete:

**Plan
Complete
Date:**

Health and Safety: Ventilation/Electrical/Facility Installation and Maintenance

H&S.17 All necessary ventilation, plumbing, electrical, noise and lighting services shall be installed and maintained to conform to applicable laws and in such a manner as to prevent or minimize hazardous conditions to workers in the facility. (S)

Noncompliance

Explanation: 1. The electrical panel was blocked with work in process.

2. The electric panel lacked signage indicating the amount of voltage used.

**Plan Of
Action:** Steps should be taken in order to prevent fire and personal injury. Factory shall appoint a responsible employee to ensure that H&S policy is enforced and all areas of the policy are covered, areas such as:

a) Employers required to develop, maintain and regularly review written H&S policy;

b) Compliance with legal minimum H&S standards, regulations, procedures (fire safety, PPE, safety equipment, chemical handling, storage, toilet hygiene, drinking water);

c) MSDS: clearly communicate them to workers, post in all chemical storage areas;

d) First aid: outlining H&S management procedures; responsibilities, rights, duties of worker management and designated personnel, including regular medical examinations were chemicals are used.

e) Safety training: should encourage workers to use PPE and instruct them on reasons for it and how to use it properly (fire fighting equipment should not be blocked by materials, production machinery, emergency exits, doorways and stairwells or workstations). This shall then be communicated to all workers in the local language or languages.

f) Maintenance equipment: should be clearly marked with regular inspection sheet showing all requirements and load limits, weight capacities and kept up to date.

Deadline

Date:

Action

Taken:

Plan

Complete:

Plan

Complete

Date:

Health and Safety: Machinery Maintenance and Worker Training

H&S.18 All production machinery, equipment and tools shall be regularly maintained and properly guarded. Workers shall receive training in the proper use and safe operation of machinery, equipment and tools they use. Employers shall ensure safety instructions are either displayed/posted near all machinery or are readily accessible to the workers. (S)

Noncompliance

Explanation: 1. No maintenance records were available for review, including for sewing machines.

2. The sewing machines lacked safety devices such as pulley guards.

**Plan Of
Action:**

Steps should be taken in order to prevent fire and personal injury.

Factory shall appoint a responsible employee to ensure that H&S policy is enforced and all areas of the policy are covered, areas such as:

a) Employers required to develop, maintain and regularly review written H&S policy;

b) Compliance with legal minimum H&S standards, regulation, procedures (fire safety, PPE, safety equipment, chemical handling, storage, toilet hygiene, drinking water);

c) MSDS: clearly communicate them to workers, post in all chemical storage areas;

d) First aid: outlining H&S management procedures; responsibilities, rights, duties of worker management and designated personnel, including regular medical examinations were chemicals are used.

e) Safety training: should encourage workers to use PPE and instruct them on reasons for it and how to use it properly (fire fighting equipment should not be blocked by materials, production machinery, emergency exits, doorways, stairwells or workstations). This shall then be communicated to all workers in local language or languages.

f) Maintenance equipment: should be clearly marked with regular inspection sheet showing all requirements and load limits, weight capacities and kept up to date.

Deadline

Date:

Action

Taken:

Plan

Complete:

Plan

Complete

Date:

Health and Safety: Sanitation in Factory Facilities

H&S.22 All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with all applicable laws, including relevant sanitation, medical and safety and health regulations. (S)

Noncompliance

Explanation: The bathroom requires maintenance.

Plan Of

Action:

Factory maintains clean, well-ventilated and private toilets are segregated by gender for the use of all factory workers. Bathrooms/toilets should have toilet doors for privacy, toilet paper for western toilets, clean running water for non-western toilets, running water and soap outside toilets for workers to wash their hands. Factory should have procedures for keeping bathrooms and toilet areas cleaned throughout the working day.

Deadline

Date:



**Action
Taken:**

**Plan
Complete:**

**Plan
Complete
Date:**

Health and Safety: Drinking Water

H&S.26 Safe and clean drinking water shall be freely available at all times, within reasonable distance of the workplace. Drinking water shall be of a reasonable temperature and the means to drink water (cups, etc.) must be safe and sanitary and available in an appropriate number. (S)

Noncompliance

Explanation: Disposable drinking cups have not been provided to workers.

**Plan Of
Action:** Disposable cups shall be provided for all drinking water stalls and shall be kept stocked at all times.

**Deadline
Date:**

**Action
Taken:**

**Plan
Complete:**

**Plan
Complete
Date:**



Hours of Work: Time Recording System

HOW.6 Time worked by all workers, regardless of compensation system, shall be fully documented by time cards or other accurate and reliable recording systems such as electronic swipe cards. Employers are prohibited from maintaining multiple time-keeping systems and/or false records for any fraudulent reason, such as to falsely demonstrate working hours. Time records maintained shall be authentic and accurate. (P)

Noncompliance

Explanation: 2 of 4 workers have not been registering their attendance when entering and leaving the facility.

Plan Of Action: Factory shall maintain accurate and consistent records for monitoring pay and working hours, this includes ensuring all timesheets are kept up to date, clocking systems tally with registers, delivery notes, needle logs inspection, production reports, and cleaning records. All information must match from employee to employee. In order to determine code compliance, it is necessary that factories have available, complete, accurate and up to date records. Factories are required to implement a clocking or time card system to log all employees' timings of breaks, starts and finishes.

Deadline Date:

Action Taken:

Plan Complete:

Plan Complete Date:
