

FLA Audit Profile	
Country	Pakistan
Factory name	260057422E
IEM	T Group Solutions Pvt. Ltd.
Date(s) in facility	October 16-17, 2006
PC(s)	Russell Athletic
Number of workers	1218
Product(s)	Knit Apparel
Production processes	Cut to Pack

FLA Code/Compliance Issue	Country Law/Legal Reference	FLA Benchmark	Noncompliance
1. Code Awareness			
Code Posting/Information		FLA Principle of Monitoring, Obligation of Companies: Establish and articulate clear, written workplace standards. Formally convey those standards to Company factories as well as to licensees, contractors and suppliers.	1 code of conduct (COC) poster for Russell Athletic was seen posted in English near the finishing section office and 1 in the local language in the ladies' sewing hall. They were not posted in a prominent place easily accessible to all employees. Russell Athletic's COC poster is not posted anywhere at the facility [Factory name].
Worker/Management Awareness of Code		FLA Principle of Monitoring, Obligation of Companies: 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.	Workers are not aware of the Russell's COC elements. Neither Russell nor factory has made any effort to communicate the COC elements to employees.
Confidential Noncompliance Reporting Channel		FLA Principle of Monitoring, Obligation of Companies: 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.	There is no secure communication channel for reporting issues of noncompliance.
2. Forced Labor			
There will not be any use of forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise.			

Employment Records	Employment (Record of Services) Act 1951	Employers will maintain sufficient hiring and employment records to demonstrate and verify compliance with this code provision.	Factory only maintains records of the personal data sheet and a copy of the National Identity Card for piece-rate workers. No other employment documents are maintained.
Employment Terms	West Pakistan Industrial and Commercial Employment (Standing Orders) Ordinance 1969	Employment terms shall be those to which the worker has voluntarily agreed.	1) Personnel file review revealed that some appointment letters on file were not signed by employees. 2) Most interviewed workers stated that they had not received a copy of their appointment letter. 3) Workers stated that they are not given time to read the employment documents prior to signing on them. They are asked to sign the documents quickly and get to work; a copy of these documents is not provided to them.
Recruitment Contracts		There can be no employment terms (including contracts, recruitment arrangements, or any other instruments) which specify that employees can be confined or be subjected to restrictions on freedom of movement; allow employers to hold wages already earned; provide for penalties resulting in paying back wages already earned; or, in any way punish workers for terminating employment. (It is acceptable to provide bonuses to workers who stay for a term of contract and meet reasonable conditions, such as regular attendance, punctuality, good quality, etc.	Appointment letters state that workers need to obtain prior approval if they do not wish to work on a gazetted holiday.
Other			1) No interviewed workers were aware of any induction program. 2) Female workers stated they use company transport to commute to factory. If they leave factory after regular work hours, they are dropped off where they are picked up from in the morning. However, when working OT, they are dropped off at a particular point from where they have to make their own arrangements to get home. Workers stated that their parents get worried, as it gets dark and they have to walk home alone if there are no other co-workers staying in that area.
3. Child Labor			
No person will be employed at an age younger than 15 (or 14 where the law of the country of manufacture allows) or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15.			
4. Harassment or Abuse			
Every employee will be treated with respect and dignity. No employee will be subject to any physical, sexual, psychological or verbal harassment or abuse.			

Verbal Abuse		Employers will prohibit screaming, threatening, or demeaning verbal language.	Workers stated that supervisors often speak to them with aggression and in loud tones. They feel nervous and insulted.
Gender Sensitive Security		Security practices will be gender-appropriate and non-intrusive.	There is no female security guard posted at the facility.
Access to Facilities		Access to food, water, toilets, medical care, health clinics or other basic necessities will not be used as either reward or punishment.	1) Interviewed workers stated that they are given a lunch break of 30 minutes which includes 15 minutes of prayer break. They find it very difficult to have their lunch and return to work in such a short time. If they are late in reporting for work after lunch, they are reprimanded and warned. 2) Some workers said they were reprimanded for eating in their work areas on a rainy day. Workers have been requesting a canteen (legally required), but there has been no response from management.
Freedom of Movement		Employers will not unreasonably restrain workers' freedom of movement, including movement in canteen, during breaks, using toilets, accessing water, or to access necessary medical attention.	1) Female workers stated that they need to obtain a "pass" to use the toilets. At times when there is work pressure, workers are refused permission to use the toilets until their work is completed. 2) Both the toilets in a toilet block on the second floor in unit 2 at [Factory name], were found to be locked; hence, they could not be used.
5. Nondiscrimination			
No person will be subject to any discrimination in employment, including hiring, salary, benefits, advancement, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, or social or ethnic origin.			
Sex Discrimination		There shall be no differences in compensation and benefits attributable to gender.	Interviewed male workers said that while female workers are provided free transportation, male workers are not provided this. They said that commuting to the factory was a problem they faced.
Other			Workers in [Factory name] stated that workers who give money to supervisors are given priority over other workers in working overtime.
6. Health and Safety			
Employers will provide a safe and healthy working environment to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of employer facilities.			

Fire Safety: Health and Safety Legal Compliance	Factories Act 1934	Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits	1) Emergency lights installed over some exits were not working in some places. 2) There are no emergency lights on some of the exits, staircase landings, and main pathways leading to exits.
Document Maintenance/ Accessibility		All documents required to be available to workers and management by applicable laws (such as policies, material safety data sheets (MSDS), etc.) shall be made available in the prescribed manner and in the local language or language spoken by majority of the workers if different from the local language.	1) MSDS posted at the chemical storage area in the dye-house is not only blocked with chemical containers, the printed matter has also become garbled because of chemical vapors/moisture. 2) MSDS postings do not reflect nature of hazard in color codes, which making it difficult for workers to comprehend them. 3) MSDS not posted in the chemical mixing room, the winch dye section, and the dye store. 4) MSDS posted only for some of the chemicals stored in the chemical store.
Evacuation Procedure	Factories Act 1934; Section 25, Punjab Factories Rules 1978	All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, unblocked aisles/exits, employee education, evacuation procedures, etc.) shall be complied with and workers shall be trained in proper safety, first aid, and evacuation procedures.	1) In work areas where they exist, aisle markings have faded; no aisle markings in most work areas. 2) Evacuation signs not posted in work areas. 3) Emergency lights installed not high-beam type, but low intensity tube lights, which are not appropriate in thick smoke. 4) Many exits in work areas open inwards, instead of outwards. 5) 1 of the dye house emergency exits is blocked with compacting machine and a workstation. 6) Exits blocked in some work areas; aisles blocked in most work areas at both locations. 7) Yellow boxes marked "Keep clear" not marked in front of some exits and under some fire extinguishers; these markings have faded in many areas where posted. 8) "Do not use lift in case of fire" not posted in local language outside of lift cage on all floors. 9) "Gray" fabric store has no emergency exit. 10) Evacuation plans not posted in some work areas, while those posted are not appropriate, as they do not depict layout of floor areas and are incomplete. 11) In production areas, many operators had blocked their access to passage with bins or trolleys; some were completely "caged in" from all sides with no means of escape during an emergency. 12) Most production areas are quite disorganized. Aisles blocked, workstations are located in a haphazard manner, trolleys and cartons scattered in work areas and exit pathways difficult to determine. 13) Air pipe seen across passage on 2nd floor at unit 2. 14) Both exits located on same wall and not in opposite directions at unit 2 on 2nd floor.

Safety Equipment	Factories Act 1934 and Punjab Factories Rules 1978	All safety and medical equipment (such as fire fighting equipment, first aid kits, etc.) shall be in place, maintained as prescribed and accessible to the employees	1.Fire extinguishers were found blocked in many places in work areas at both the locations.2.Some of the fire extinguisher locations are not marked.3.There is no fire extinguisher installed at the finished goods store.4.There are no first-aid boxes provided in work areas. Only one was seen in the production hall at Leisure Textiles and it only had cotton wool and eye drops. 5.Only one fire extinguisher installed at the chemical store had expired.
Personal Protective Equipment (PPE)	Factories Act 1934 and Punjab Factories Rules 1978	Workers shall wear appropriate 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 hazardous elements including medical waste.	1) Fabric dust seen on operators' hair in production areas. None of these operators had been provided dust masks and they were breathing in dust particles. 2) Workers on stain removing jobs using paper masks instead of filter masks to prevent breathing in toxic fumes. Some not using any mask. 3) Rubber mats not provided to pressmen, many of whom were working barefoot. 4) Ear muffs not provided at power generating sheds where sound levels are in excess of 100dbs. when generators are in operation. 5) Operators on band-knife machines use protective glove only on 1 hand instead of both hands. 6) Interviewed workers stated they are not provided with respiratory masks to prevent them from breathing in floating fiber. 1 interviewed worker was suffering from tuberculosis. 7) No signs or diagrams posted in language spoken by workers, indicating need for personal protective equipment
Chemical Management		All chemicals and hazardous substances should be properly labeled and stored in accordance with applicable laws. Workers should receive training, appropriate to their job responsibilities, in the safe use of chemicals and other hazardous substances	1) Barrels containing high speed diesel and chemicals seen lying outside in open, exposed to rain and sunlight at both locations. No smoking sign and fire extinguishers also not provided in these areas. MSDS not posted. 2) Barrels containing 'percho-ethylene' used for stain removing seen kept on passage leading to toilet blocks. 3) Many chemical containers and high speed diesel barrels do not bear any signage of contents. 4) Test reports indicating pH levels of water being discharged after treatment at effluent treatment plant not available for review.

<p>Ventilation/Electrical/Facility Maintenance</p>	<p>Punjab Factory Rules 1978</p>	<p>All ventilation, plumbing, electrical, and lighting services shall be provided and maintained to conform to applicable laws and prevent hazardous conditions to employees in the facility.</p>	<p>1) Desert cooler in dye house did not have rear protective cover exposing internal electrical and an exhaust fan running at a high rpm. Heavy lint accumulation on motor, wiring, and water pump installed inside. 2) Live electrical wires with taped joints noticed in work areas. 3) Electric switch-gear and electric panels found blocked with furniture and bags of garments in work areas at both locations. 4) Cobwebs seen on overhead lights and electric wires in many work areas at both locations. 5) Heavy lint noticed on wall fans, exhaust fans, electric wires and cables, steam pipes and overhead lights in work areas. 6) Workers stated that working conditions were poor. Work areas have a lot of fabric dust; ventilation is poor. During summer months coolers and fans do not work, so sometimes it gets very uncomfortable. 6) Open junction boxes of electrical wires seen in cutting section on 2nd floor at cut panel storage area. 7) Wire of vertical cutting machine seen running on floor across passage. 8) Lighting at most work areas and at needle point on sewing machines is inadequate ranging from 60 lux to 350 lux. 9) Ambient temperatures in work areas ranged from 92°F to 95°F. 10) Cover of an electric panel missing at production hall at (units 5 and 6). 11) Broken electric switches seen in stain removing section at unit 3 on 1st floor.</p>
<p>Machinery Maintenance</p>	<p>Factories Act 1934</p>	<p>All production machinery and equipment shall be maintained, properly guarded, and operated in a safe manner.</p>	<p>1) In winch dye area, belt guards missing from transmission drives of 2 machines. 2) Steam pipe in winch dye area not insulated and could cause burn injuries. 3) Needle guards either missing or had been tampered with, rendering them ineffective on most sewing machines. 4) Belt guards and under-motor pulley guards missing from some sewing machines. 5) Pedal mats missing from most sewing machines. 6) Exhaust pipes of power generating sets not insulated. 7) Buttoning machines do not have eye shields.</p>

Sanitation in Facilities	Factories Act 1934 and Punjab Factories Rules 1978	All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with applicable laws.	1) Stagnant water noticed in dye house, in places where floor was damaged. 2) Some flushes in gents' toilet block not working; toilet closet doors corroded and need to be repaired. 3) Floor of "gray" fabric store damaged at many places. 4) Housekeeping standards poor. 5) All flushes in gents' toilet block at unit 2 on 2nd floor found broken. Doors found corroded. 6) No hand drying facility provided at hand wash areas in toilet blocks. Soap not available at some hand wash areas. 7) Medical room, as required by law, not provided. 8) Some interviewed workers stated that toilet facilities were inadequate. 9) Workers stated that drinking water facilities were not adequate. 10) Number of toilets for male workers are inadequate. 11) During interviews, workers stated that doctor is available only up to 1pm everyday. If there is an emergency after 1 pm, workers are taken to a clinic located close to the factory.
Sanitation in Dining Area	Factories Act 1934		1) 1 drinking water cooler installed at entrance of toilet block. By law, it should be at least 20 feet away. 2) Most drinking water cooler installations do not have water filters installed on water pipeline. 3) No canteen facility provided for workers. This is a legal requirement. 4) All workers complained that they do not have a canteen and are uncomfortable while having lunch. They stated that they have to sit on the floor and eat. Most of them complained of rats running all over the place and they found it very difficult to eat. The prayer hall provided for women. where they also sit on the floor and have their food, poorly maintained and workers had to clean it up themselves before they could sit down to eat. 5. During interviews, female workers stated that heating arrangement provided for heating food in the prayer/lunch hall for women, was inadequate to cater to over 150 workers. Also, at times, freezer provided does not work, resulting in food spoiling. 6) Workers complained of sand in drinking water.
Other	Factories Act 1934		1) Fabric rolls in dye house stored in disorganized manner. No passages provided between stacks of rolls. 2) Main store disorganized; goods stored in haphazard manner and on passage. Emergency exit at store locked. 3) Some female workers in standing jobs in production hall on 1st floor seen wearing hard-soled platform sandals while some seen working barefoot. 4) Waste fabric store was completely choked with fabric pieces stuffed up to ceiling and exit. This is a fire hazard. 5) Packed goods store on 1st and ground floors disorganized. Aisles either blocked with cartons or not provided between stacks/rows of cartons.
7. Freedom of Association and Collective Bargaining			

Employers will recognize and respect the right of employees to freedom of association and collective bargaining.			
Employer Interference/Elections	Industrial Relations Ordinance 2002	Workers' organizations have the right to elect their representatives and conduct their activities without employer interference.	Worker representatives in Grievance Committee nominated by management. Committee consists of 6 members, out of which 4 are workers' representatives. There was only 1 female worker representative, who has since left.
Other			Workers felt very scared to approach supervisors with any grievances because they are insulted and their problems are rarely addressed. They stated there was no one in the facility to hear their grievances. They also said that most of the factory staff is related to management in some way or the other; hence, there is no point in taking their grievances to them, they will not be heard.
8. Wages and Benefits			
Employers recognize that wages are essential to meeting employees' basic needs. Employers will pay employees, as a base, at least the minimum wage required by local law or the prevailing industry wage, whichever is higher, and will provide legally mandated benefits.			
Minimum Wage	Finance Act 2006, The Punjab Gazette (Extra Ordinary) August 10, 2006	Employers will pay workers the legal minimum wage or the prevailing industry wage, whichever is higher.	1) Factory has revised minimum wages for unskilled workers. However, factory has yet to revise wages for other categories. Security guards, telephone operators, timekeepers who generate pay records, quality inspectors in dye house, assistant, operator boiler, stain remover in cutting section, stitchers in stitching lines, etc., are being paid unskilled wages. 2) Details piece-rate workers' earnings not available for review. Only record reflecting total earnings produced for review. Review of these records reveal that some workers have been paid an amount less than minimum wage. In absence of time record and attendance records, cannot confirm if minimum wages are being paid to these workers.
Wage Benefits Awareness		Employers will communicate orally and in writing to all employees in the language of the worker, wages, incentive systems, benefits, and bonuses to which all workers are entitled in that company and under the applicable law.	Wages mentioned in workers' personnel files do not match figures cited by workers during interviews.

Deduction for Services		Deductions for services to employees will not exceed the cost of the service to the employer. If questioned, employers will demonstrate the reasonableness of these charges.	Piece-rate workers engaged through a contractor. Part of earnings of piece rate workers given to contractor. E.g., if rate per piece for a particular operation is Rs 6.60/-, worker gets Rs 5.40/-, while Rs 1.20/- is required to be given to contractor by worker. This practice carries on as long as worker is employed through contractor. If worker refuses to give this amount, their services are discontinued by the contractor with the help of the management.
Payroll Reporting	West Pakistan Payment of Wages Rules 1960.	Accurate and reliable payroll reporting, including pay stubs will be provided.	Date of wage payment not mentioned on the wage records.
Pay statement		Employers will provide workers a pay statement each pay period, which will show earned wages, regular and overtime pay, bonuses and all deductions.	Wage slips issued are in English.
Time-recording system	Punjab Factories Rules - 1978 and Factories Act - 1934	Time worked by all employees, regardless of compensation system, will be documented by time cards or other accurate and reliable recording systems such as electronic swipe cards.	1) As stated by management, manual time records maintained for piece rate workers. However, they could not be produced for review. 2) Time recording system does not appear to be accurate. Instances noticed where, for example, a worker punched out at 07:18am the next day after working the night; however, the in time, against the same worker on the day he exited is also recorded as 6.58 am. This is physically impossible and needs to be looked into. Similar recordings for other workers were also noticed.
Record Maintenance	Factories Act 1934, West Pakistan Minimum Wages for Unskilled Workers Ordinance-1969	All compensation records will be maintained accurately and should be acknowledged by the employee as accurate.	1) Details of earnings for piece rate workers not available for review. Only record reflecting total earnings made available. 2) Wage records do not provide details of overtime hours worked.

Legal benefits	Factories Act 1934	Employers will provide all legally mandated benefits to all eligible workers.	1) Interviewed workers stated that if they are unwell and cannot attend work, they call up and inform their supervisors. However, their supervisors ask them to take medicine and report for work. Workers narrated some instances where they lost wages as they could not attend work due to illness. These workers were not getting mandated benefit of sick leave. 2) Workers stated that no medical checks are conducted as required by law. 3) Workers stated they have not received any bonus so far from factory, although they have been working for 7-10 years. Factory only pays a profit amount of Rs 1500/- every year. 4) Piece rate workers stated in interviews they do not have a social security card; hence, they cannot avail medical benefits under this scheme.
Payment of Legal Benefits	Factories Act-1934	Legally mandated benefits will be provided or paid in full within legally defined time periods.	Workers stated that they have not received any bonus so far from the factory, although they have been working for 7-10 years. Factory only pays a profit amount of Rs 1500/- every year.
Legal Compliance for Holiday/Leave	Factories Act 1934	Workers will be paid for holidays and leave as required by law.	All interviewed workers stated they do not get leave when requested. In 1 instance, worker stated that she was refused the leave she had requested to attend her sister's wedding.
Accurate Recording of Wage Compensation	West Pakistan Minimum Wages for unskilled workers Ordinance 1969	All hourly wages, piecework, bonuses, and other incentives will be calculated and recorded accurately.	1) Minimum wages being calculated based on number of days in month and not on 26 days as required by local law. 2) Piece rate workers stated that, in most instances, number of pieces recorded by supervisor does not match personal records maintained by them. If number of pieces recorded by supervisor is less than pieces on records maintained by workers, then supervisors record is considered as final record. In reverse case, which occurs occasionally, if number of pieces recorded by supervisor for particular worker are more than that recorded by worker, monetary benefit of additional pieces on the supervisors' record is distributed amongst all workers performing that operation in that particular batch and not specifically to that worker. Hence, supervisors' record is gospel; as a result, workers often tend to lose.

Minimum Wage/Incentives		Regardless of any production quotas, incentives will not be reduced or unpaid if the result will be wages below the minimum wage.	1) Workers stated they are required to complete their targets irrespective of machinery breakdown. Unless they do so, they are unable to earn additional incentive. Interviewed workers also said that machinery maintenance is not satisfactory and there are frequent breakdowns. Repairs take time and they lose on production time and quality is also affected. Piece rate workers stated that this impacts their earnings. 2) Some salaried workers stated they are paid Rs 4000/- as salary (unskilled rate). To qualify for higher category of wage, being skilled workers, they are required to earn an additional amount of Rs.1500 through a piece-rate based production incentive system. If they earn Rs.1000 or more by way of this incentive system they are paid full amount so earned. However, if they earn less than Rs.1000 by way of incentive then incentive amount paid to them is 50% of the qualifying amount of Rs.1500.
Other			1) Workers stated that rate per piece for re-pressing garments, has been halved over the past few months, whereas the rate per piece for pressing garments has not been enhanced in past 7 years. 2) Production workers stated that the rate per piece paid to them was the lowest in the industry. It has remained at Rs.6 per piece for the past 10 years while the cost of food has increased at least 2 and a half times during this period.
9. Hours of Work			
Except in extraordinary business circumstances, employees will (i) not be required to work more than the lesser of (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture or, where the laws of such country will not limit the hours of work, the regular work week in such country plus 12 hours overtime; and (ii) be entitled to at least one day off in every seven day period.			
Forced Overtime		Under extraordinary business circumstances, employers will make extensive efforts to secure voluntary overtime work prior to mandating involuntary overtime.	Few workers complained of forced overtime. In 1 instance, worker was not allowed to leave, although she had requested permission to leave to attend her uncle's funeral. Workers stated that if they refuse to work overtime, they were told that they need not come to work the next day.

Overtime Limitations	Factories Act 1934	Except in extraordinary business circumstances, employees will (i) not be required to work more than the lesser of (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture or, where the laws of such country will not limit the hours of work, the regular work week in such country plus 12 hours overtime; and (ii) be entitled to at least one day off in every seven day period. An extraordinary business circumstance is a temporary period of extra work that could not have been anticipated or alleviated by other reasonable efforts.	1) Time record review of some workers revealed they have worked up to 80 hours a week in September 2006. 2) Review of time records reveal that some workers in maintenance department, electricians, and boiler house have worked on rest days in September and October 2006. 3) Instances of some workers from fabric finishing department having worked for 13 days continuously seen. 4) Instances of workers having worked continuously from 3pm on a particular day to 11:00pm the next day. Per time records these workers had punched out at 6:02am on 2nd day and punched in again at 6:51 am and went on to work until 11:00pm.
Other	Factories Act 1934		Adequate gap for rest is not provided to workers during shift change at the dye house. For instance, worker in B shift (3:00pm to 11:00pm) who actually worked until 7:00am the next day was transferred to A shift (7:00am to 3:00pm) and continued to work until 11:00pm.
10. Overtime Compensation			
In addition to their compensation for regular hours of work, employees will be compensated for overtime hours at such premium rate as is legally required in the country of manufacture or, in those countries where such laws will not exist, at a rate at least equal to their regular hourly compensation rate.			
Accurate Recording of OT hours Worked?		Employees will be paid for all hours worked in a workweek. Calculation of hours worked must include all time that the employer allows or requires the worker to work.	Time records for piece rate workers was not produced for review. Hence, could not verify working hours.
OT Compensation	Factories Act 1934	The factory shall comply with applicable law for premium rates for overtime compensation.	Workers stated during interviews that work done on rest days is at times compensated with a single wage payment and a compensatory day off or a double wage payment with no compensatory day off.
Miscellaneous			
Other			

	record review and management interviews	Finding was Incriminating.						
	record review and worker interviews	Finding was Incriminating.						
	record review	Finding was Incriminating.						
	worker interviews	Finding was Incriminating.						

	worker interviews	Finding was Incriminating.						
	visual observation; worker and management interviews	Finding was Incriminating.						
	worker interviews	Finding was Incriminating.						
	visual observation, worker interviews	Finding was Incriminating.						
	male worker interviews	Finding was Incriminating.						
	worker interviews	Finding was Incriminating.						

	visual inspection	Finding was Incriminating.						
	visual inspection	Finding was Incriminating.						
	visual inspection	Finding was Incriminating.						

	visual inspection	Finding was Incriminating.						
	Visual Inspection and worker interviews.	Finding was Incriminating.						
	visual inspection	Finding was Incriminating.						

	visual inspection and worker interviews	Finding was Incriminating.						
	visual inspection	Finding was Incriminating.						

	visual inspection and worker interviews	Finding was Incriminating.						
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	visual inspection	Finding was Incriminating.						

	worker and management interviews	Finding was Incriminating.						
	worker interviews	Finding was Incriminating.						
	record review; worker and management interviews	Finding was Incriminating.						
	record review and worker interviews	Finding was Incriminating.						

	worker interviews	Finding was Incriminating.						
	record review	Finding was Incriminating.						
	record review; worker and management interviews	Finding was Incriminating.						
	management interviews	Finding was Incriminating.						
	record review; worker and management interviews	Finding was Incriminating.						

	record review; worker and management interviews	Finding was incrimination						
	worker interviews	Finding was incrimination						
	worker interviews	Finding was Incriminating.						
	record review; worker and management interviews	Finding was Incriminating.						

	worker interviews	Finding was Incriminating.						
	worker interviews	Finding was Incriminating.						
	worker interviews	Finding was Incriminating.						

	record review	Finding was Incriminating.						
	time record review and worker interviews	Finding was Incriminating.						
	management interviews and record review	Finding was Incriminating.						
	worker interviews	Finding was Incriminating.						
No procedure in place to monitor implementation of COC at premises of subcontractors (knitting and printing)	management interviews	Finding was Incriminating.		1) Factory pays for any urgent medical expenditure required by employees. 2) Factory pays for annual entertainment for all employees at Rs 350 /- for local meal and Rs 1000/- for employees visiting hill stations. 3) Factory provides free transportation to female workers for pick up and drop off.				

Mediation		[Status]	Updates		Third-Party Verification	
Company Follow Up	Documentation	Completed, Pending, Ongoing	Company Follow Up	Documentation	External Verification (Date)	Documentation

Company Verification Follow Up	
Company Follow Up	Documentation

