FLA Audit Profile	
Country	China
Factory name	050215440E
IEM	Global Standards
Date(s) in facility	October 18-19, 2006
PC(s)	Liz Claiborne, Inc., Nordstrom, Inc.
Number of workers	498
Product(s)	Jeans, Garments
Production processes	Cutting, Sewing, Sampling, Finishing

			IEM Findings						Remediation				[Status]	Updates (Cite Date of Follow Up)		Updates (Cite Date of Follow up)		Third-Party Verification		Company Verification Follow	
FLA Code/Compliance Issue	Country Law/Legal Reference	FLA Benchmark	Noncompliance	Risk of Noncompliance	Evidence of Noncompliance (Uncorroborated)	If Not Corroborated, Explain Why	Sources/ Documentation	Notable Features	PC Remediation Plan	Target Completion Date	Company Follow Up	Documentation	Completed, Pending, Ongoing	Company Follow Up (March 15, 2007)	Documentation	Company Follow Up (November 9, 2007)	Documentation	External Verification (Date)	Documentation	Company Follow Up	Documentation
1. Code Awareness																					
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.	All workers interviewed are not familiar with the code of conduct (COC).			Factory provides trainings on COC for workers.	record review; management and worker interviews						Completed		record review, management interview	During a reaudit auditor confirmed, factory provides trainings on COC for workers.	record review, management interview				
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.		No policy to ensure that workers can use a grievance system without fear of reprisal and no procedures for solving complaints.			record review, management interview		Nordstrom in process of reviewing secure communication channels for factory worker usage.				Pending								
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.																					
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.																					
Lack of Protection of Underage Workers	Circular of Ministry of Labor on Issuing Provisions on Special Protection for Juvenile Workers (LMI No. 498 of 1994). Seventeen Regulations Pertaining to Labor Law, Ministry of Labor, China Labor Press: Governs employment of workers between 16 and 17 years of age. Specifies types of labor which shall not be performed by juvenile workers, and lists medical conditions which shall bar a juvenile from working. Juvenile workers shall be registered and undergo regular medical examinations. Date of entry into force: 1995-01-01	Employers will ensure that, all workers engaged in operating or working close to hazardous equipment, working at dangerous heights or lifting heavy loads, or exposed to hazardous substances, are above the legal age for such work.		No policy on the protection of juvenile workers. Management reported that they do not have a policy, as they do not recruit juvenile workers.			record review, management interview		Management has corrected this issue by no longer hiring juvenile workers. However, factory rules, regulations and employee handbooks should be updated to include recruiting policies for juvenile workers and specialized requirements of juvenile workers. All notices that are legally required to be posted in factory work areas will be posted. All legally required documents, such as copies of legal code or law, will be kept at the factory and available for inspection.	2/1/2007			Completed	Pending review of updated policies to ensure accuracy. Follow up will be needed.		During a reaudit auditor confirmed workers understanding of all factory rules, regulations, as well as juvenile worker policies. Confirmed there are no juvenile workers employed at factory.	Employee handbook				
Other				There is 1 contradiction between factory regulation and worker handbook. Factory regulation, Article 3. Factory hires workers who are at least 16 years old. Worker handbook, Article 8, factory hires workers who are at least 18 years old.			record review		Factory rules, regulations and employee handbooks should be updated to state the same information regarding recruiting policies formal workers including juvenile workers. All notices that are legally required to be posted in factory work areas will be posted. All legally required documents, such as copies of legal code or law, will be kept at the factory and available for inspection.	2/1/2007			Completed	Pending review of updated policies to ensure accuracy. Follow up will be needed.		During a reaudit auditor confirmed workers understanding of all factory rules, regulations, as well as juvenile worker policies. Confirmed there are no juvenile workers employed at factory. Confirmed all regulations, rules and requirement information is the same in all posted and printed documentation.	Employee handbook, factory regulations				
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 of abuse.																					
Progressive Discipline		Employers will utilize progressive discipline, e.g., escalating discipline using steps such as verbal warning, written warning, suspension, termination. Any exceptions to this rule, e.g., immediate termination for theft or assault, shall be in writing and clearly communicated to workers.	Disciplinary actions include only warning and termination, that is if workers violate one regulation, they will receive written warnings, if they violate the same regulation again, they will be fired with no pay.				record review, management interview		Employers will utilize progressive discipline, e.g., escalating discipline using steps such as verbal warning, written warning, suspension, termination. Any exceptions to this rule, e.g., immediate termination for theft or assault, shall be in writing and clearly communicated to workers.	2/1/2007	2/8/2007		Completed	Factory has submitted the plan and proposal for review. However, as Chinese New Year (CNY) holiday is approaching, while factory expected to have a high turnover rate after the new year, training to workers on new company policies will be conducted after the holidays.		During re-audit the auditor reviewed and verified updated disciplinary process and procedure. Factory utilizes a progressive escalating discipline process of verbal warning, written warning, suspension and lastly termination. This includes communication to workers on how to comment, repeal or challenge disciplinary action leading to termination. Workers and management interviewed for understanding of disciplinary practices. Both management and all interviewed employees confirmed only verbal and/or written warnings are used to correct employees' mistakes. No disciplinary deduction detected from facility's written regulations, payroll registers, or reported by any employee.	disciplinary procedure review				
Other				Factory does not have a policy regarding harassment and abuse.			record review, management interview		Factory rules, regulations and employee handbooks should be updated to include policy regarding harassment and abuse. All notices that are legally required to be posted in the factory work areas will be posted. All legally required documents, such as copies of legal code or law, will be kept at the factory and available for inspection.	2/1/2007			Completed	Pending review of updated policies to ensure accuracy. Follow up will be needed.		During a reaudit auditor confirmed harassment and abuse policy has been added and posted.	Employee handbook; factory regulations and rules				
				In cases where disciplinary process results in termination, there is no policy to provide workers with an opportunity to reply, challenge or making appeals against the termination.			record review, management interview		Employers will utilize progressive discipline, e.g., escalating discipline using steps such as verbal warning, written warning, suspension, termination. Any exceptions to this rule, e.g., immediate termination for theft or assault, shall be in writing and clearly communicated to workers. This will include communication to workers on how to comment, repeal or challenge disciplinary action leading to termination.	2/1/2007	2/8/2007		Completed	Factory has submitted the plan and proposal for review. However, as Chinese New Year (CNY) holiday is approaching, while factory expected to have a high turnover rate after the new year, training to workers on new company policies will be conducted after the holidays.		During re-audit the auditor reviewed and verified updated disciplinary process and procedure. Factory utilizes a progressive escalating discipline process of verbal warning, written warning, suspension and lastly termination. This includes communication to workers on how to comment, repeal or challenge disciplinary action leading to termination. Workers and management interviewed for understanding of disciplinary practices. Both management and all interviewed employees confirmed only verbal and/or written warnings are used to correct employees' mistakes. No disciplinary deduction detected from facility's written regulations, payroll registers, or reported by any employee.	disciplinary procedure review; management and worker interviews				
				Factory regulation, Article 22 only states that factory can fire workers for operational purposes as per law. No specific procedures regarding notification process and other related issues including notification process, process dates, whether workers have an opportunity to reply, challenge or make appeals. Furthermore, if factory does not include more details in factory regulations, workers will not know understand, and usually no worker knows where to find the law on their own.			record review, management interview		Employers will utilize progressive discipline, e.g., escalating discipline using steps such as verbal warning, written warning, suspension, termination. Any exceptions to this rule, e.g., immediate termination for theft or assault, shall be in writing and clearly communicated to workers. This will include communication to workers on how to comment, repeal or challenge disciplinary action leading to termination.	2/1/2007	2/8/2007		Completed	Factory has submitted the plan and proposal for review. However, as Chinese New Year (CNY) holiday is approaching, while factory expected to have a high turnover rate after the new year, training to workers on new company policies will be conducted after the holidays.		During re-audit the auditor reviewed and verified updated disciplinary process and procedure. Factory utilizes a progressive escalating discipline process of verbal warning, written warning, suspension and lastly termination. This includes communication to workers on how to comment, repeal or challenge disciplinary action leading to termination. Workers and management interviewed for understanding of disciplinary practices. Both management and all interviewed employees confirmed only verbal and/or written warnings are used to correct employees' mistakes. No disciplinary deduction detected from facility's written regulations, payroll registers, or reported by any employee.	disciplinary procedure review; management and worker interviews				
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.																					
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.																					
Safety Equipment	Fire regulation #14, Point 5. Ensure all fire fighting equipment are function and easy access.	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.	Part of the fire extinguishers are blocked.				visual inspection		Ensure all extinguishers are unblocked and easily accessible.	12/1/2006	1/5/2007		Completed	Factory states they have been completed, but need to receive photos and/or on-site visit to verify.		During reaudit, auditor verified no extinguishers are blocked and all are easily accessible.	factory tour				
Personal protective equipment (PPE)	Factory Health & Safety regulation #74. Factory must provide appropriate PPE for worker.	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.	Inappropriate protective equipment for cleaning workers, and workers do not use it when working.				visual inspection		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. Factory must train workers on how to use the PPE and educate them on why wearing PPE properly is necessary.	12/1/2006	1/5/2007		Completed	Factory states they have been completed, but need to receive photos and/or on-site visit to verify.		During reaudit, auditor confirmed workers are provided and wearing 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. Reaudit confirmed factory trained workers on how to use PPE and educated them on why wearing PPE properly is necessary.	factory tour				

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Chemical Management	Health & Safety regulation #6, Point 3. All chemicals should have clear Chinese label on container.	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.	No Chinese label on some of the chemical bottles.				visual inspection		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.	12/1/2006	1/5/2007		Completed	Factory states they have been completed, but need to receive photos and/or on-site visit to verify.		During reaudit, auditor confirmed MSDS are maintained and posted. Auditor confirmed employees using chemicals are provided with respirators and all of them were wearing the provided personal protective equipment. All chemicals in use and storage are clearly labeled.	factory tour				
Machinery Maintenance	Industrial safety regulation #32. Machinery should protective cover or guard for protection.	All production machinery and equipment shall be maintained, properly guarded, and operated in a safe manner.	No protective cover at sewing machines.				visual inspection		All production machinery and equipment shall be maintained, properly guarded, and operated in a safe manner.	12/1/2006	1/5/2007		Completed	Factory states they have been completed, but need to receive photos and/or on-site visit to verify.		During reaudit, auditor confirmed, in terms of machine safety, all machines with rotating parts are equipped with pulley guards where applicable.	factory tour				
7. Freedom of Association and Collective Bargaining																					
Employers will recognize and respect the right of employees to freedom of association and collective bargaining.																					
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.																					
Wage Benefits Awareness		Employers will communicate orally and in writing to all employees in language of worker the wages, incentive systems, benefits and bonuses to which all workers are entitled in that company and under the applicable law.			[Some] workers do not know how to calculate wages. Workers enjoy paid holidays, but [some] workers expressed that they did not know they were paid.	Factory provides trainings on these issues for workers.	record review; management and worker interviews.														
Wage and Benefits Posting		All notices that are legally required to be posted in the factory work areas will be posted. All legally required documents, such as copies of legal code or law, will be kept at the factory and available for inspection.	Labor law is not posted throughout the facility.				visual inspection, management interview		Some basic China Labor Laws not posted; some factory regulations not clearly listed and/or needed updating. This was marked as a violation, as 100% of factory regulations and China Labor Laws not posted and/or made available to workers. There are a couple ways the factory can remediate: 1) post copy of China Labor Laws to ensure all workers are informed and updated about legal information related to wage, hours, benefits and health and safety. This should be a stapled packet posted in areas all workers can review such as canteen, factory production floor or dormitory and 2) include China Labor Laws in employee handbook that also includes updated factory rules and policies. All notices that are legally required to be posted in factory work areas will be posted. All legally required documents, such as copies of legal code or law, will be kept at factory and available for inspection.	1/1/2007	2/8/2007		Completed	Factory posted copy of China Labor Law on notice boards of each production floor. This will be verified in follow-up visit after Chinese New Year.		During reaudit, confirmed that the factory posted a copy of the China Labor Laws on notice boards of each production floor.	factory tour				
Legal Benefits	Article 72, PRC Labor Code, the sources of social insurance funds shall be determined according to the branches of insurance, and an overall raising of social insurance funds shall be practiced step by step. The employing unit and laborers must participate in social insurance and pay social insurance premiums in accordance with the law.	Employers will provide all legally mandated benefits to all eligible workers.	Factory buys all 5 kinds of insurance for 190 senior workers out of 498 workers.	Record review found there is no specific policy regarding how workers can enjoy paid sick leave.	Workers reported that they did not have paid sick leave.	Management explained that workers could not enjoy paid sick leave unless they could provide appropriate document issued by doctor. There is no such case yet, so factory could not provide any record regarding paid sick leave.	record review; management and worker interviews		Factory must provide 100% coverage for work-related injury insurance for all employees. Factory should provide coverage for all other social insurances. Factory rules, regulations and employee handbooks should be updated to include policy regarding paid sick leave, how to request it and procedures. All notices that are legally required to be posted in factory work areas will be posted. All legally required documents, such as copies of legal code or law, will be kept at the factory and available for inspection.	1/1/2007	2/8/2007		Completed	Social insurance purchases will occur after Chinese New Year, as many workers tend to not return and factory wants total headcount for accident/injury insurance purchase. Will be verified via documentation review.		During reaudit, social insurance receipts provided for review. As per receipts, all employees in facility are covered by work-related injury frame under social insurance program. No apparent concern was detected regarding the benefit of employees.	insurance receipt				
Payment of Wages	[City name], Wage Payment regulation, Article 13: Unit must pay the wages at last day of termination or resignation.	Legally mandated bonuses (e.g. 13th month payments and severance payments) will be paid in full and in a timely manner.	No matter when workers quit, they should wait until the next pay date to get the wages.				record review; management and worker interviews		Factory agreed to create a document for workers to sign to verify they are being paid for all days worked within, at the most, 10 days of their last day worked.	1/1/2007	2/8/2007		Completed	Pending review of plan proposal to ensure accuracy. Follow up will be needed.		During reaudit, confirmed factory created a document for workers to sign to verify they are being paid for all days worked within at the most 10 days of their last day worked. As per provided payment records, terminated employees are paid off on the 10th day after termination.					
Record Maintenance	[City name] Wage payment regulation, Article 16: Payroll documents should be kept for at least for 2 years.	All legally required payroll documents, journals and reports will be available complete, accurate and up-to date. (In the United States terms this would include W-4s, I-9s, green cards, 941s and supporting material.)	1) Factory only keeps records of terminated or retrenched employees for 1 to 2 months. 2) Factory does not keep old contracts.				record review, worker interviews		All legally required payroll documents, journals and reports will be available complete, accurate and up-to date. All legally required documents (payrolls, employment contract, personnel records, including termination/retrenchment, etc.) must maintained by the factory onsite for at least one year.	1/1/2007	2/8/2007		Completed	Pending on-site reaudit after Chinese New Year for verification.		During reaudit, auditor reviewed and confirmed all legally required payroll documents, journals and reports were made available and were complete, accurate and up to date. All legally required documents are maintained by the factory on site for at least 1 year.	payroll document, journal, report				
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	Labor Law, Article 41: Employers must get laborers' agreement to prolong working hours in order to meet production needs.	Under extraordinary business circumstances, employers will make extensive efforts to secure voluntary overtime work prior to mandating involuntary overtime.			Workers' handbook, Article 32, Working days in factory are 6 days, 8 hours per day, working hours exceeding these 48 hours will be regarded as OT. If factory requires OT, workers must work OT unconditionally.	Management explained that when they trained workers on workers' handbook, they would tell workers that this article was outdated, and that all working time exceeding 40 hours would be regarded as OT. Payroll also shows that working hours exceeding 40 regarded as OT. Workers said that working hours exceeding 40 hours would be regarded as OT, and they could ask for leave if they had reasonable cause.	record review; management and worker interviews		Factory rules, regulations and employee handbooks should be updated to include policy regarding working overtime hours is voluntary. Article 32 of worker handbook will be revised to show work over 40 hours a week is treated as overtime. All notices that are legally required to be posted in factory work areas will be posted. All legally required documents, such as copies of legal code or law, will be kept at the factory and available for inspection.	12/1/2006	2/8/2007		Completed	Pending review of plan proposal to ensure accuracy. Follow up will be needed.		During the re-audit the auditor confirmed that factory rules, regulations and employee handbooks updated to include policy that working overtime hours is voluntary. Auditor also confirmed that all overtime is voluntary.	worker interviews				
Overtime Limitations	Article 41 PRC Labor Code, employing unit may extend working hours as necessitated by its production or business operation after consultation with the trade union and laborers, but extended working hours per day shall generally not exceed 1 hour; if such extension is needed for special reasons, under condition that the health of laborers is guaranteed, extended hours shall not exceed 3 hours per day. However, total extension in a month shall not exceed 36 hours. According to Regulations about Employee Work Time by State Government - May 1, 1997, Article #3 Employees shall work 40 hours per week, overtime is not to exceed 36 hours per month.	Except in extraordinary business circumstances, employees will i) not be required to work more than lesser of a) 48 hours per week and 12 hours overtime or b) limits on regular and overtime hours allowed by law of country of manufacture or, where laws of such country will not limit hours of work, the regular work week in such country plus 12 hours overtime; and ii) be entitled to at least 1 day off in every 7-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.	Many workers worked around 65 hours a week last December. Most workers worked around 65 hours for a week in this January. Most sewing workers from [some] teams worked 70-80 hours for 1 week this March. Most workers continuously worked for 13 days last December, 10 days this January. Most sewing workers worked continuously for 13 days; some sewing workers worked continuously for 23 days this March.				record review; management and worker interviews		Except in extraordinary business circumstances, employees will i) not be required to work more than lesser of a) 48 hours per week and 12 hours overtime or b) limits on regular and overtime hours allowed by law of country of manufacture or, where laws of such country will not limit hours of work, the regular work week in such country plus 12 hours overtime; and ii) be entitled to at least 1 day off in every 7-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.	1/1/2007	2/8/2007		On-going	Continuous improvement model to see gradual reduction in OT hours worked. Will follow up after Chinese New Year.		During the reaudit, auditor conducted a full payroll journal check. Payroll journals for February, August, and September 2007 reviewed as management and workers both advised this peak production. Auditor confirmed no Sunday work reflected and 7th day of rest guaranteed to all employees currently. Auditor reviewed factory's comprehensive working hours system waiver, effective 81/2007 to 7/31/2008. However, waiver is inadequate, based upon authorization by local town labor department, authorized local country or above level labor department. Although still over legal limits, there has been a decrease in OT hours worked with the most monthly OT hours being 46 hours in September 2007.	payroll documents				
Voluntary OT		Overtime hours worked in excess of code standard will be voluntary.		No written policy or record showing that OT exceeding code standard is voluntary. But management and workers all reported that if they didn't want to work OT, they could orally tell supervisors, which would not affect full attendance bonus.			record review; management and worker interviews		Factory rules, regulations and employee handbooks should be updated to include policy regarding working overtime hours is voluntary. All notices that are legally required to be posted in factory work areas will be posted. All legally required documents, such as copies of legal code or law, will be kept at factory and available for	12/1/2006	2/8/2007		Completed	Pending review of plan proposal to ensure accuracy. Follow up will be needed.		During the re-audit, auditor confirmed that factory rules, regulations and employee handbooks updated to include policy that working overtime hours is voluntary. Auditor also confirmed that all overtime is voluntary.	Employee handbook; factory regulations and rules; worker interviews				

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4E 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?	Guangdong wage payment regulation Article 4 : Wage calculation in according to the actual working hours.	Employees will be paid for all hours worked in a workweek. Calculation of hours worked must include all time that the employee allows or requires the worker to work.			Factory calculates OT hours according to OT hours set in advance, not actual OT hours recorded in time cards. For example, 1 worker swiped time card at 17:57pm and then left at 22:30pm, but OT set by production department is from 18:00 to 21:00. Factory accounting department would count OT hours as 3.5 hours, not 4.5 hours recorded in time cards. The management explained that because some workers would go to production places to chat while rest at work, it is not realistic to count this time as OT hours. According to records review, difference between OT hours in time cards and payroll is several hours, and such case just happened to some workers. Workers said that they did not go to work before set time.		record review; management and worker interviews		Factory to submit plan by 12/01/2006. Employees will be paid for all hours worked in a workweek. Calculation of hours worked must include all time that employer allows or requires worker to work. Factory must calculate OT hours according to actual OT hours recorded on time cards, not pre-determined OT hours set by factory. All OT premium must be calculated based on actual OT hours.	12/1/2006	2/8/2007		Completed	Pending review of plan proposal to ensure accuracy. Follow-up will be needed.		During resaudit, auditor confirmed that a swiping time card system is used for recording working hours. Per provided time records, established working hours are from 8:00am to 5:30pm, with a 1.5-hour lunch break. Employees work 5 days per week, Monday-Friday. All provided payroll journals are itemized as pay period, department no., name, regular working hours, regular wage, regular overtime hours, rest-day overtime hours, statutory holiday overtime hours, regular wage, accordingly overtime compensation, total wage, full-attendance bonus, subsidy, deductions, net wages and employees' signatures. In addition, employees compensated at 150% and 200% of normal wage for overtime hours on regular days and rest days, respectively.	time record				
OT Compensation Awareness		Workers shall be informed about overtime compensation rates, by oral and printed means.			[Some] workers reported that they did not know how to calculate OT wages.	Factory provides trainings on how to calculate OT wages to workers.	record review; management and worker interviews														
Miscellaneous																					