



2011

FAIR LABOR ASSOCIATION INDEPENDENT EXTERNAL MONITORING REPORT

COMPANY: Columbia Sportswear;
Nike, Inc.

COUNTRY: Indonesia

FACTORY CODE: 550233756GV

MONITOR: Andrew Teh

AUDIT DATE: July 28 – 29, 2011

PRODUCTS: Knitwear: Tops, Bottoms

PROCESSES: Cutting, Sewing, Finishing,
Embroidery

NUMBER OF WORKERS: 1337



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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: 1. At least 1 worker from sewing special has been taking a long sick leave for more than 1 year; the wage payment already came to 25% of wages in accordance to regulation on long sick paid leave issue. However, last May 2008, the worker came to work for 4 days only. After the 4 days of work, the worker got the illness again and still received 25% of wage, instead of full wage, although the worker submitted a legitimate sick letter from the clinic to prove their medical status condition.

2. There were no uniforms provided for newly hired security guards (4 workers), even though they were required to wear the uniform every working day. Currently, they wore uniforms paid for by themselves.

Legal Reference: 1) Labor Act UU No: 13/2003, Article: 93 (3): The amount of wages payable to workers who are taken ill as mentioned under point a of subsection (2) shall be determined as follows: a) for the first 4 months, they shall be entitled to receive 100% of their wages; b) for the second 4 months, they shall be entitled to receive 75% of their wages; c) for the third 4 months, they shall be entitled to receive 50% of their wages; and d) for subsequent months, they shall be entitled to receive 25% of their wages prior to termination of employment by the entrepreneur.

Plan Of Action: 1. Work with factory to investigate the issue and review of the law regarding sick leave and payment. Verify the discrepancy in sick leave benefits and request retroactive payments, as needed.

2. Standardize uniforms for security guards, search for a uniform supplier, and provide uniforms.

Deadline Date: 01/31/2009

Supplier CAP: 1. This issue was not discussed during the closing meeting. Factory said the worker has been taking sick leave less than 1 year (not more than 1 year per FLA monitor). Factory will investigate the issue and review the law regarding sick leave and payment.

2. Factory has an agreement that the new workers are not provided the uniform; however, they are planning to provide the uniform for all security guards, including new workers.

**Supplier
CAP Date:** 08/01/2008

**Action
Taken:** 1. Factory has paid the discrepancy of the worker's wage. Since the worker has been on sick leave less than 1 year, factory paid 50% of the wage (not 25% of wage). Nike's agent verified the payment.

2. The factory has conducted a meeting with management regarding uniforms. The issue was reported to management and they are still working on a solution to obtain uniforms for the security guards. Factory provided uniforms for all new security guards, a total of 5 workers, on December 1, 2008.

**Plan
Complete:** Yes

**Plan
Complete
Date:** 06/30/2009

**Action
Verified:** Yes

**Action
Verified
Text:** Completed.

1. Based on document review, factory has paid the wage discrepancy to the worker.

2. Based on document review and interviews, the factory provided uniforms to the security guards on December 1, 2008.

**Action
Verified
Date:** 07/28/2011

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: [New Finding:](#)

1. According to document review, JAMSOSTEK (Social Security and Retirement Fund Scheme) payments were late for the period of April – September 2010 and November 2010.

2. According to document review, the factory did not pay the transport allowance to workers who have been working since January 2011 (more than 3-month probation period).

Legal Reference: 1) Government Regulation No. 14, Year 1993, Chapter II, Article 10.1: monthly fee to be paid by the employer each month at the latest, the 15th of the following month; 2) Local labor Act No. 13, Year 2003, Chapter 5, Article 22 Subsection (2), the rights of the apprentice include the right to receive pocket money and or transport money, the right to receive social security for employees, certificate upon completion of apprenticeship if they successfully complete the apprenticeship program.

Plan Of Action:

1. Develop RCA (Root Cause Analysis) for pending payment issues of employee social benefit rights (related with JAMSOSTEK, Transportation, Uniform for new security, etc.).

2. Review existing factory payment policy.

3. Socialize Factory Payment Policy for workers.

Action plan agreed upon by factory and brands, August 2011:

1. Factory will pay the JAMSOSTEK on time each month.

2. Transport allowance: a) review the current pay processes of new employees to ensure that transport allowance payment executes according to the employment contract (after 3-month probation period) and b) develop a system to ensure that every new employee that has passed the probation period gets the related payment (including transport allowance) accordingly.

Deadline Date: 10/31/2011

Supplier CAP: Factory will pay the balance of the transport allowance; will be included in salary payment of July 2011, which will be paid on August 5 (April 2011 IDR 99.000; May 2011 IDR 45.000; June 2011 IDR 90.000).

Supplier CAP Date: 11/11/2011

Action Taken: 1. Nike representative visited the factory in October 2011 and verified that the factory has been paying the JAMSOSTEK on time since December 2010.

2. The factory has paid the balance of the transport allowance on August 5 pay slips in the following amounts: April 2011 IDR 99.000; May 2011 IDR 45.000; June 2011 IDR 90.000.

Plan Complete: Yes

Plan Complete Date: 11/11/2011

Wages, Benefits and Overtime Compensation: Other - Wages, Benefits and Overtime Compensation

Other

Notable Feature

Explanation: The factory provided wages more than the legal minimum wage as the basic wage for about 95% of the workers employed. The basic wage included seniority allowance (Rp 5,000 – 15,000 per month) for worker's employed 1 year and above. The factory also provided some allowances for their workers, which are not mandatory by local regulation, such as: a) skill or position allowance (Rp 10,000 – 397,700 per month); b) miscellaneous allowance for chief level (Rp 100,000 – 289,000 per month), c) allowance for sample workers (Rp 20,000 per month); d) housing allowance (Rp 15,000 – 20,000 per month) for those employed more than 3 years; e) attendance allowance (at minimum Rp 114,450 per month) for those have fully attendance in a month; f) meal allowance (Rp 6,000 per attendance day) for all workers; g) transportation allowance (Rp 4,500 per attendance day) for those that did not use bus provided by the factory; h) shift allowance (Rp 2,500 per attendance day) for those that worked in the shift system; and i) other than those mentioned above, the factory also provided a can of milk per week and additional cash as much as Rp 4,000 per day for extra food for certain jobs and sections; such as spot cleaning, embroidery, workers working on shift 3 and in security. Furthermore, the THR (the 13th salary) that normally is paid before a big Muslim holiday once a year was paid with the calculation above regulation applied (e.g., Rp 50,000 for those employed less than 3 months, proper calculation as regulation for those employed 3 – 12 months and 115% of salary for those employed 1 – 5 years, 157% of salary for those employed 5 – 8 years, 210% of salary for those employed 8 – 10 years, and 215% of salary for those employed 10 years and above). Those rules were regulated on the collective bargaining agreement (CBA).

Plan Of Action: Review salary structure related with adjustment of employee wage increment concerns to accommodate seniority allowance referred to in the CBA and Indonesian Man Power Ministerial Regulation (Permenakertrans) No 1/1999, Article 14, Sub-articles 2 and 3 with required: The Entrepreneur should given minimum wage rate payment higher than the District Minimum Wage Standard for the Employees who have been worked more than 1 year.

Deadline Date: 02/06/2013

Supplier CAP: Review the current factory salary structure that refers to CBA and Local Regulation (Permenakertrans No 01/1999) requirement.

Supplier 01/08/2013
CAP Date:

Action Taken: Based on verification process during collaborated meeting (Nike, Colombia, and [Factory name]) on January 8, 2013, the update is: Based on the factory's CBA review and checked employee salary slips (for employees who have been working less than 1 year), knew that the factory had already given minimum wages higher than the district minimum wage standards to their employees, as referred to in the factory's CBA (valid August 2, 2011 until August 1, 2013), that mentions the factory conducts an annual adjustment of employee salaries based on the rules below: 1) salary amount for new employees (less than 1 year of service): a) length of work service 0 – 3 months: follow district minimum wage standard; b) length of work service 3 – 12 months: given minimum wage + extra amount Rp 5,000; 2) salary for the senior employees: length of work service more than 1 year: a) get additional difference value of the old minimum wage with the new minimum wage, b) get additional work performance reward as below: i) A-level work performance achievement, will get additional salary compensation, Rp 15,000; ii) B-level work performance achievement will get additional salary compensation, Rp 10,000; iii) C-level work performance achievement will get additional salary compensation, Rp 5,000; iv) D-level work performance achievement will not get additional salary compensation, Rp 0. Based on those CBA rules, currently, factory already gives employee minimum wage higher than the district minimum wage standard, cause any extra salary payment with amount Rp 5000, after the employee has worked more than 3 months (after new employee passed evaluation of 3-month probation period).

Plan Complete: Yes

Plan Complete Date: 01/15/2013



Freedom of Association: General Compliance Freedom of Association

FOA.1 Employers shall comply with all local laws, regulations and procedures concerning freedom of association and collective bargaining. (S)

Noncompliance

Explanation: The CBA was valid from January 1, 2004 to December 31, 2005. However, until now, the factory has not maintained a new CBA. Management claimed that it was still under negotiation between the management and the union.

Legal Reference: Labor Act UU No: 13/2003 Article 123, Section 1: The validity of the collective labor agreement is for 2 years. Section 2: The effectiveness of the collective labor agreement as mentioned under subsection (1) may be extended for no longer than 1 year based on a written agreement between the entrepreneur and the trade/labor union(s.)

Plan Of Action: 1. Work with factory to conduct a series of meetings with the union on CBA renewal.
2. Ask for regular review of updates needed in CBA.

Deadline Date: 09/30/2009

Supplier CAP: Factory has conducted a meeting with the union to discuss the new CBA and we will make sure both sides agree with the new CBA. It will be sent to the labor department.

Supplier CAP Date: 08/01/2008

Action Taken: The CBA is under final revision by union and management. It will be finished in December 2008.

February 5, 2009: Factory held a meeting between the union and management on January 2; they planned to meet again regarding the CBA on January 24.

May 18, 2009: Factory has yet to finalize the new CBA with the union due to changes in the union chairman in the middle of negotiations. Factory has obtained an extension on the CBA from the local manpower office until September 2009; however, factory is targeting to finalize the negotiations by the end of June 2009.

June 9, 2009: Management is still in negotiations with the union regarding CBA renewal. The process has faced some challenges, including internal disputes among the union (some members attempted to form another union). Management has obtained a letter from the Department of Labor to complete the renewal by September 2009; however, management is targeting to complete the negotiations by July 2009. Based on the fact that Nike's agent, [Agent name], checked and knew the factory already renewed their CBA based on Bipartite Meeting and the current CBA already got validation from the local manpower agency from August 18, 2009 until August 17, 2011. Furthermore, factory has renewal and validated their current CBA since August 2, 2011 until August 1, 2013.

Plan Complete: Yes

Plan Complete Date: 07/28/2011

Action Verified: Yes

Action Verified Text: Completed. The latest CBA is valid from August 1, 2009 until July 31, 2011. The management and the union had their last meeting to finalize the new CBA (valid August 1, 2011 until July 31, 2013) on July 28, 2011.

Action Verified Date: 07/27/2011

Follow-up Plan of Action: Brands confirmed management and union representation signed the new CBA on July 28, 2011.

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: Based on CBA review, there were no terms and conditions indicated in the disciplinary practice policy for work suspension that could be applied to workers.

Plan Of Action:

1. Work with factory to include disciplinary practice policy into revised CBA.
2. Ask for regular updates or need for renewals.

Deadline Date: 06/30/2009

Supplier CAP: Factory will provide the disciplinary procedure in complete explanation and will mention it in the new CBA.

Supplier CAP Date: 08/01/2008

Action Taken: The company has revised the suspension rule, and has included it in the new CBA. The suspension rule is explained in detail in the disciplinary procedures.

February 5, 2009: The disciplinary procedures are mentioned in the CBA, but the CBA has yet to be finalized. Factory met to discuss the CBA on January 24.

May 18, 2009: The suspension policy is mentioned on the new draft of the CBA; however, the new CBA has yet to be finalized due to changes in the union chairman in the middle of negotiation. In the meantime, the factory has developed a procedure on suspension: whenever there is a case of suspension before the CBA is finalized, the factory will communicate the procedure through the union, bipartite meeting, training to workers, and posting the procedure on the announcement board. Once the CBA has been finalized, the factory will provide workers with a copy of the CBA.

Plan Complete: Yes

Plan 06/30/2009

**Complete
Date:**

Action No

Verified:

Action Ongoing. The factory has revised the suspension rule and it has been included in CBA
Verified Article 31, stating about the definition of suspension and mechanism and the law
Text: reference on the latest CBA. However, there were no details as for what kinds of
mistakes that workers would be given "suspension."

Action 07/27/2011

Verified

Date:

Follow-up Action plan agreed upon by factory and brands, August 2011:

Plan of

Action:

1. Review the current policy/CBA to include detail on type of mistakes that may get suspension measure.
2. Develop HR-related procedures that include all employee discipline measures, including type of mistakes that may get suspension measure.
3. Develop a supplement to CBA (Article 31) to include detail on type of mistakes that may get suspension measure. Factory will complete by September 30, 2011.

Follow up, June 2012: The HR Manager amended the article on suspension and management and SPN agreed on the amendment. The amendment was announced on Monday, June 4, 2012, to workers and the amendment was posted on notice board.

Harassment or Abuse: Discipline/Review of Disciplinary Action

H&A.3 The disciplinary system shall include possibilities for workers to have disciplinary action imposed on them reviewed by someone at a higher managerial position than the manager who imposed the disciplinary action. In addition, such a system shall include the ability of a worker to appeal and/or question any disciplinary action against him or her and/or have a third party of his or her choice present when the disciplinary action is being imposed. (P)

Noncompliance

Explanation: The disciplinary practice system did not provide workers with an opportunity to reply, challenge or make appeals against the termination.

Plan Of Action: 1. Work with factory to set up policy and procedure for employees to comment on/appeal disciplinary actions.
2. Work with factory to include the policy in the revised CBA. 3. Communicate policy and procedure to workers.

Deadline Date: 09/30/2009

Supplier CAP: Factory will provide the disciplinary procedure in complete explanation and will mention it in the new CBA.

Supplier CAP Date: 08/01/2008

Action Taken: The factory has revised the suspension rule so that workers have the opportunity to appeal against termination. The suspension rule is explained in detail in the disciplinary procedures in the new CBA.

May 19, 2009: CBA is yet to be finalized due to change in union leadership mid-negotiation. The factory is targeting to complete the CBA by the end of June 2009.

June 9, 2009: Disciplinary practice system with appeal procedure against termination is still undergoing the approval process of both management and union, along with the revision of the new CBA. Management is attempting to develop a company internal policy and procedure while waiting for the CBA's completion. Nonetheless, management was advised to establish a disciplinary practice system with appeal procedure against termination.

Plan Complete: Yes

Plan 01/08/2013

**Complete
Date:**

Action No

Verified:

Action Pending. Factory has not revised the above disciplinary practice clause on the latest CBA.

Verified According to the factory management, they will include it in the new CBA.

Text:

Action 07/27/2011

Verified

Date:

Comments: Based on verification with factory team during collaboration meeting (Nike, Columbia, Factory team) on January 8, 2013: Checked factory CAP document; knew factory already revised termination procedure on May 29, 2012. Also covered employees' opportunity to appeal against termination.

Action plan agreed upon by factory and brands, August 2011:

1. Review the current policy/CBA to include the detailed clause on workers' opportunity to reply, challenge or appeal against employment termination into the to be developed new CBA.

2. Develop HR-related procedures that the detailed clause on workers' opportunity to reply, challenge or appeal against employment termination into the to be developed new CBA.

3. Develop a supplement to CBA (Article 33), the detailed clause on workers' opportunity to reply, challenge or appeal against employment termination into the to be developed new CBA. The factory will complete by September 30, 2011.

Harassment or Abuse: Discipline/Worker Awareness and Participation of Workers

H&A.6 Workers must be informed when a disciplinary procedure has been initiated against them. Workers have the right to participate and be heard in any disciplinary procedure against them. Employers shall maintain written records of all disciplinary actions taken. Workers must sign all written records of disciplinary action against them. Such records must be maintained in the worker's personnel file. (P)

Noncompliance

Explanation: There was no proper record keeping system maintained for the warning letters issued to workers. Some warning letters were kept in 1 folder, while some were kept in the related worker's personnel file. Hence, there were some difficulties found when tracing the historical warning letter issued to workers.

Plan Of Action: 1. Work with factory to create a system to maintain warning letters issued to workers.
2. Train factory to review all warning letter documentation and to make a copy of the warning letter and keep 1 copy in the concerned personnel's file.

Deadline Date: 01/31/2009

Supplier CAP: Factory will keep the warning letter in each personal file and will maintain it properly.

Supplier CAP Date: 08/01/2008

Action Taken: The warning letter has been kept in each personnel file, and it is being maintained properly.

Plan Complete: Yes

Plan Complete Date: 10/27/2008

Action Verified: Yes

Action Verified Text: [Completed](#). The factory keeps the warning letters in each respective employee's personnel file.

Action Verified Date: 07/27/2011

Harassment or Abuse: Discipline/Training of Management

H&A.7 Employers shall ensure managers and supervisors are fully familiar with the factory disciplinary system and trained in applying appropriate disciplinary practices. (P)

Noncompliance

Explanation: There was no specific training ever conducted for manager and supervisor level staff on applying appropriate disciplinary practices.

Plan Of Action:

1. Work with factory to develop training material on applying disciplinary actions.
2. Train all supervisors on the new policy and request updates of training as needed.

Deadline Date: 01/31/2009

Supplier CAP: Factory will conduct the training as a requirement for all managers and chiefs. It will be mentioned during the annual training program and it will be conducted on a regular basis.

Supplier CAP Date: 08/01/2008

Action Taken: Factory has a written schedule to conduct training on disciplinary practices and will conduct the training as scheduled.

[February 5, 2009:](#) Factory is still in the process of conducting disciplinary training for managers and supervisors.

[April 18, 2009:](#) Company verified that the factory has completed training all managers and supervisors on the warning letter issuance procedure.

Plan Complete: Yes

Plan Complete Date: 05/09/2009

Action Verified: Yes

Action Verified Text: Completed. Factory has conducted following training programs as per the below dates: January 6, 2009: harassment abuse policy, harassment abuse procedure, grievance procedure; February 9, 2009: warning letter procedure, harassment abuse procedure, grievance procedure; June 4, 2009: grievance procedure, type of grievance system, worker-management communication; June 22, 2009: investigation team training, harassment abuse and grievance system; January 3, 2011: harassment abuse policy; May 9, 2011: grievance procedure

Action Verified Date: 07/27/2011

Harassment or Abuse: Violence/Harassment/Abuse

H&A.13 Employers shall ensure that the workplace is free from any type of violence, harassment or abuse, be it physical, psychological, sexual, verbal, or otherwise. Employers shall refrain from any action – and shall take all appropriate action to ensure that all workers refrain from any action – that would result in an intimidating, hostile or offensive work environment for workers. (S)

Noncompliance

Explanation: 1. Based on management's response to the letters received through suggestion box and worker interviews, there were 2 complaints delivered by workers regarding chief and supervisor who likes to yell at workers due to production issues.

Plan Of Action: 1. Follow up with factory regarding supervisor/chief motivation tactics.
2. Work with factory to provide training on harassment and abuse to all supervisors.

Deadline Date: 08/28/2009



Supplier CAP: Factory will conduct training and will do an investigation process on each harassment and abuse case and will give warning to workers or manager as mentioned in the H&A procedure.

Supplier CAP Date: 10/27/2008

Action Taken: Factory has already investigated the harassment and abuse case prior to the FLA audit. In response (prior to FLA audit), the supervisor was given a verbal warning. In addition, a harassment and abuse training program was provided to both supervisors and workers. The factory has scheduled a repeat training.

February 5, 2009: Company verified that the factory has taken the following steps: The factory is maintaining all records of verbal warning letters; factory will give appropriate punishment to each harassment and abuse case; and the factory will keep records on each case.

Based on Nike's agent review:

1. Factory re-investigated the case regarding the supervisor and came to the same conclusion as the first investigation.
2. To prevent re-occurrence, the factory has conducted re-training program on the harassment and abuse policy and procedure for all supervisors and chiefs in the sewing section on January 6, 2009.
3. Factory included harassment and abuse topics for the annual training program for workers and supervisors.
4. Factory revised harassment and abuse investigation form and provided a disciplinary record for verbal warnings.

May 28, 2009: Verbal harassment or abuse was reported again during the current visit. Interviewed workers reported that they were occasionally being scolded at in public by their supervisor for poor performance and misbehavior. Management was advised to provide communication and further training with all personnel regarding possible harassment or abuse.

Plan Complete: Yes

Plan Complete Date: 05/30/2011

Action Verified: [Yes](#)

Action Verified Text: [Completed](#). The supervisor has been given a verbal warning and the factory recommended her to be re-trained on the non-harassment policy. She has participated in the training (attendance record was reviewed).

Action Verified Date: [07/27/2011](#)

Harassment or Abuse: Security Practices/Body Searches

H&A.15 All security practices shall be gender-appropriate and non-intrusive, so that the dignity of the worker concerned is protected when a search is undertaken. Searching of bags and other personal items to prevent theft is acceptable. Body searches and physical pat-downs shall only be undertaken when there is a legitimate reason to do so and upon consent of the worker, unless a state official with the power to do so (such as police officer) has ordered the search. Body searches cannot be undertaken in public and the person who undertakes the search shall be of the same sex as the person who is being searched. (S)

Noncompliance

Explanation: [New Finding](#): According to management and worker interviews, the security guards would conduct the physical pat-downs when workers are going back through the main gate.

Plan Of Action: [The factory should not conduct physical pat-downs on workers.](#)

Deadline Date: [09/30/2011](#)

Supplier CAP: [Factory will arrange socialization of proper body checks for security team.](#)

Supplier CAP Date: [10/31/2011](#)

Action Taken: In a visit by a Nike representative in October 2011, it was verified that the factory has stopped conducting physical pat-downs of the workers. Factory already stopped the physical pat-downs for workers, starting on October 28, 2011. The instructions on security checks are documented and communicated to the security guards.

Plan Complete: Yes

Plan Complete Date: 10/28/2011

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: No evidence that company has formally conveyed workplace standards to the factory. Furthermore, originally, company-provided code of conduct (COC) is in English, even through the company's QC officer and local offices are in Indonesia. The factory actually obtained the COC in Bahasa Indonesia through its head office in Korea. The code posted was in A4 format in form of photocopy document only. There were 2 company COCs posted, 1 posted near the drinking water spot and sewing area and another 1 posted near the canteen area. Due to size of the COC, it was not clearly visible as a COC poster.

Plan Of Action: Company will ask the factory to enlarge the COC poster.

Deadline Date: 12/31/2008

Action Taken: Factory has posted COCs (Nike, Columbia) in production area (posted at main door in sewing section and on the announcement board).

February 5, 2009: Company conducted verification visit on January 15 and confirmed that the factory has posted COCs (Nike, Columbia) in production areas listed above.

Plan Complete: Yes

Plan Complete Date: 01/15/2009

Action Verified: Yes

Action Verified Text: Completed. The factory has posted the company COCs (Nike, Columbia) poster in the local language in the production area entrance and on the announcement board.

Action Verified Date: 07/27/2011

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: No evidence indicating that the company has undertaken other efforts to educate the management and the employees about the company's standards on a regular basis.

Plan Of Action: Company will investigate whether code standards and workers' rights are currently covered in new hire orientation and/or regular training program. Company will ask factory to add more content on code standards and workers' rights to existing training program and/or to increase frequency of training to ensure broader code awareness by management and employees. Company will conduct verification visit in January 2009 to check improved code awareness.

Deadline Date: 01/31/2009

Action Taken: Factory conducted COC socialization for workers August 8, 2011, through 5-minute meeting and also covered it in induction/orientation training for new employees, but no regular training plan to raise employee awareness on COC and factory standard concerns is in place.

Plan Complete: Yes

Plan Complete Date: 08/08/2011

Action Verified: No

Action Verified Text: Ongoing. The factory conducted internal training on COC June 21, 2010, and January 31, 2011. However, worker interviews with workers revealed that some workers were not clear about the COC.

Action Verified Date: 07/27/2011

Follow-up Plan of Action: Action plan agreed upon by factory and brands, August 2011:

1. Evaluate the current related training program to assess the level of training effectiveness including ways to raise all employees' awareness.
 2. Continue the factory's current training program with the recent training evaluation results incorporated into the regular training.
-

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: No evidence indicating there is a noncompliance reporting mechanism including a non-retaliation policy, which allows factory workers to contact the company in the factory.

Plan Of Action: Company's objective is to strengthen contract manufacturers' internal grievance systems, so direct involvement by the company in employee grievances should be considered a last resort. In alignment with this objective, we work with contract manufacturers' to strengthen their internal grievance processes. In addition, company's compliance staff spends time listening to factory employees during one-on-one confidential interviews during audits and during follow-up visits. Company will verify effectiveness of factory's grievance process during next follow-up visit in January 2009.

Deadline Date: 01/31/2009

Action Taken: Columbia Sportswear's internal auditors gave business cards with contact information to some workers interviewed during Columbia's August 2007 audit. Company will continue to provide contact information to interviewed workers so workers may contact company confidentially to report issues in the factory.

Plan Complete: No

Plan Complete Date:

Action Verified: No

Action Verified Text: Ongoing. According to worker interviews, some workers did receive name cards from the company's compliance team.

Action 07/27/2011

Verified

Date:

Follow-up [Follow up, June 2012](#): The Corporate Responsibility/SMP Specialists of both brands
Plan of currently provide name cards of the auditors with cell phone numbers and email
Action: addresses to all the interviewed employees. We are looking into options for providing all workers a way of directly and securely communicating with us, which may include one or more of the following: hotline, email address, local PO box, regional phone number, etc.

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: Factory has never conducted any specific medical examinations. Medical examinations conducted were only periodic medical exams, with the same type of exams for all workers regardless their job station and job risk. Furthermore, at least 1 worker from sewing special section has been taking long sick paid leave for months due to illness. However, the factory has not conducted special medical examinations yet to verify whether or not the worker's illness was due to job-related disease.

Legal References: The Safety Act UU No.1/1970, regarding Occupational Safety Law, Chapter III, Article 8.2: Employer shall be obligated to have all workers under their supervision regularly inspected by doctor designated by employer and confirmed by Director. Labor Minister Regulation No PER-02/MEN/1980 regarding Periodical Medical Examination, Articles 2, 3 & 9: Any undertaking as referred to in subsection 2 (2) of Safety Act No. 1/1970 shall provide pre-medical exam, periodical exam, and special medical exam to workers.

Plan Of Work with factory to establish medical examination policy and procedure and follow up
Action: on conducting check ups.

Deadline 01/31/2009
Date:

Supplier The medical examination based on high-risk assessment is under the process of approval
CAP: by management and is still under process of being reviewed by external consultant.

Supplier 09/30/2008
CAP Date:

Action Taken: The factory is using an external consultant to do the medical checkup and is currently waiting for confirmation from the consultant.

February 5, 2009: Factory has contacted a consultant to conduct medical checkups and is now in the process of scheduling checkups.

May 18, 2009: Assessment to determine type of medical checkups based on job function and risk is being conducted by factory through [Company name] (medical checkup consultant). For high-risk employees, medical checkups were conducted Friday, March 6, 2009 by [Company name] for a total of 46 workers. The results of medical checkups for the 1st group were received by factory March 19, 2009 and presented to consultant April 2, 2009. Factory is still working to carry out recommendations from the consultant. For the 2nd group, the factory plans to conduct the medical checkups in September 2009.

Plan Complete: Yes

Plan Complete Date: 10/27/2008

Action Verified: No

Action Verified Text: 1. Pending. The factory has not conducted any specific medical examinations for workers yet. However, general medical check ups were conducted for 46 workers on March 2009.

New Findings:

2. According to document review, the factory did not conduct regular air quality and asbestos monitoring as required by local law.

3. According to document review, the ground water permit expired February 7, 2011.

4. According to document review, the Community Disturbance Control Permit (surat izin gangguan) expired July 5, 2010.

5. According to document review, Environmental Monitoring Report was not available.

Legal References: 2) Ministerial Reg No. PER.03/MEN/1985 about Health and Safety in Use of Asbestos, Chapter 5, Employer shall conduct regular monitoring at least every 3 months, 4) Ministry of State Regulation, No 27, Year 2009 regarding Disturbance Control.

Action 07/27/2011

Verified

Date:

Follow-up Continue and enhance HSE PDCA approach as detailed below:

Plan of

Action:

Plan: a) review existing factory HSE Organization structure, b) review existing annual HSE policy review, c) review existing annual HSE written procedure review if any new business processes/activity.

Do: a) conduct annual HIRAC update, especially if any new business processes, new facilities, relay out, new machines, new material/new chemical/new hazards substances; b) conduct Compliance Status review update referred to brand standard, local law, and other HSE standard requirements; c) arrange annual Top priority HSE program (objective and target HSE annual programs); d) schedule HSE training program for the workers and Capacity Building program for ER team; and e) develop Emergency Respond Action Plan.

Check: a) conduct regular monitoring program for Industrial Hygiene and Environmental Quality Performance (every 6 months refer to UKL-UPK requirement); b) conduct Regular HSE Inspection in shop floor (enhance EHS Committee team involve); c) conduct Occ Health Surveillance (include MCU programs); and d) conduct Annual HSE MS Internal Audit.

Act: a) arrange corrective action plan based on internal audit (or external HSE audit); b) conduct remeasuring IH condition if any engineering control action to reduce hazards risk in shop floors; and c) conduct Annual Management review of HSE Management System Implementation.

Action plan agreed upon by the factory and brands, August 2011:

1. Medical Check-up: The factory should conduct regular medical check ups on the workers: a) review the current medical check up program, create a time line for completing check ups, and contact the provider to schedule and complete the medical check ups as required and b) execute the initial regular medical check ups of 10% of total workforce by end of December 2011. Factory is targeting December 2012 for completing check ups on 100% of workforce.

2. Air Quality and Asbestos Monitoring: a) factory should measure and regularly monitor the current level of indoor air quality and conduct regular asbestos hazard control and b) factory will complete by November 30, 2011.

3. Ground Water Permit: a) submit paperwork to obtain a valid ground water permit; b) review the current license and permit tracking system to ensure a proper valid license/permit cycle; and c) factory will complete by November 30, 2011.

4. Community Disturbance Control Permit: a) submit paperwork to obtain valid Disturbance Control Permit; b) review current license and permit tracking system to ensure proper valid license/permit cycle; and c) factory will complete by November 30, 2011.

5. Environmental Monitoring Report: a) review the current Environmental Monitoring Report, update the status items (include conducting regular environmental quality monitoring, working with environmental consulting provider), and submit the updated report to respective authority office and b) factory will complete by October 31, 2011.

Health and Safety: Permits and Certificates

H&S.8 The employer shall at all times be in possession of all legally required and valid permits and certificates related to health and safety issues, such as those related to the purchase and storage of chemicals, fire safety inspections, inspection of machinery, and (chemical) waste disposal. (P)

Noncompliance

Explanation: Factory has not maintained the Environmental Management Plan/Environmental Monitoring Plan Document (UPL/UKL) on site since it was still under process.

Legal Reference: Government Regulation No.27 of 1999 Regarding Analysis of Environmental Impacts, Chapter I, Article 3: (1) Businesses of activities that might cause notable and significant impacts on environment are: a) transformation of land structure and topography condition; b) exploitation of renewable and non-renewable natural resources; c) process and activities potentially capable to cause depletion, pollution, and damage to environment, and depletion of natural resources in application; d) process and activity that may affect natural, manmade, social and cultural environment; e) process and activity that may affect preservation of natural resources conversation sites and/or cultural conservation sites; f) introduction of type of plants, animals and micro organisms; g) production and usage of organic and non-organic substances; h) application of technology predicted to have considerable potential to affect environment; and i) activity having high risk and/or affecting national security. (2) Types of businesses and/or activities referred to subsection (1) required having environmental impact assessment, which shall be established by the Minister after taking account of recommendation and opinions of other minister and/or head of non-departmental agencies involved. (4) Types of businesses and/or activities excluded from those referred to subsection (2) shall establish environmental management plan and environmental monitoring plan, assisted by the agency in charge of the relevant business and/or activity.)

Plan Of Action: Work with factory to:

1. Send application documents to local environmental department.
2. Search for a consultant.
3. Review the current conditions with consultant.
4. Conduct environmental monitoring and impact assessment.
5. Document and review findings. Create a process based on findings.
6. Validate environmental monitoring process.
7. Re-new UPL/UKL report as required.

Deadline Date: 05/18/2009

Action Taken: Factory consulted with [Consultant name] to obtain the DPPL Document from the Environment Department. The following actions were completed by the factory:

1. Meeting with the consultant [Consultant name] to prepare the documentation as required on January 28, 2009.
2. The measurement test was conducted in February 2009.
3. Factory completed the document as required since February 3 – 27, 2009.
4. Factory received a draft of DPPL document from the consultant on February 27, 2009.
5. Meeting with [Consultant name] on April 20, 2009. 6. Factory visit by [Consultant name] to [Factory name] on April 22, 2009.
7. For next step, an assessment process by the Environmental local government office will be conducted on May 18, 2009.

Plan Complete: Yes

Plan Complete Date: 10/27/2008

Action Verified: No

Action Verified Text: [Pending](#). The factory has not maintained the Environmental Management Plan / Environmental Monitoring Plan Document (UPL/UKL).
[New Finding](#): From document review, 2 boiler operator licenses expired March 2011.

Action Verified Date: 07/27/2011

Follow-up Plan of Action: [Action plan agreed upon by factory and brands, August 2011](#):
1. Submit paperwork to obtain a valid Boiler Operators' license.
2. Review current license and permit tracking system to ensure valid license/permit cycle.
3. Factory has agreed to complete by October 31, 2011.

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: [New Findings](#): According to the factory tour observation, it was noted that:

1. 1 emergency light was out of order.
2. Some evacuation arrow paintings on the floor were fading.

Plan Of Action: Brands met with the factory in August 2011. The factory has agreed to:
1. Emergency lights: a) replace the identified broken emergency lights and b) enhance internal monitoring to ensure all emergency lights are working properly.
2. Evacuation arrow paintings: a) repaint all identified emergency evacuation arrows throughout the factory area; b) enhance internal monitoring to ensure all evacuation arrows are maintained properly.



Deadline Date: 08/25/2011

Supplier CAP: Factory should maintain the emergency lights properly, so they are ready to use. Factory should maintain the arrow painted on the floor in order for it to be not faded.

Supplier CAP Date: 08/25/2011

Action Taken: Factory has repaired the broken emergency lighting and enhanced the regular checking from monthly to bi-weekly since August 15, 2011; also, repainted faded evacuation arrows on August 25, 2011.

Plan Complete: Yes

Plan Complete Date: 08/26/2011

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: New Findings: According to the factory tour observation, it was noted that:

1. 2 workers were cleaning the whiteboard market pen permanent ink with solvent without proper personal protective equipment (PPE) (facial mask, hand gloves) near the generator area.
2. 2 workers did not wear earplugs in the embroidery department.
3. The mechanic's room has no protective hand gloves and the eye goggles were old and dusty.

Plan Of Action:	<p>Brands met with the factory in August 2011. The factory has agreed to:</p> <ol style="list-style-type: none"> 1. Whiteboard cleaning PPE: a) provide proper whiteboard erasers for all whiteboards throughout the production area and b) enhance worker awareness of chemical utilization, including non-production process use. 2. Wearing earplugs: enhance internal monitoring to ensure that PPE is properly used in all areas, including areas with noise exposure above TLV (85db). Raise awareness with employees by posting more signs related to dangerous exposure levels. 3. Protective gloves and goggles: enhance internal monitoring to ensure that PPE is in good condition and properly used in all areas. Raise awareness with employees by posting more signs related to hazard exposure.
Deadline Date:	09/30/2011
Supplier CAP:	Factory should keep workers using proper PPE when working with chemical solvents. Factory should make sure all embroidery workers are using earplugs. Factory should provide hand gloves and proper eye goggles for workers at mechanic's room.
Supplier CAP Date:	08/25/2011
Action Taken:	<p>Based on Factory CAP:</p> <ol style="list-style-type: none"> 1. Factory already provided appropriate PPE for the workers who were cleaning the whiteboard marker pen with permanent ink. Also, provided appropriate eraser on those white boards and gave chemical hazard training to workers on April 13, 2011. 2. Factory has added supplies of 20 units of earplugs for embroidery operators on November 1, 2011 and conducted PPE refreshment training on October 4, 2011. 3. Factory provided hand gloves and eye goggles for mechanic staff on October 6, 2011.
Plan Complete:	Yes
Plan Complete Date:	10/07/2011

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. 1 boiler operator has never participated in boiler operator training conducted by the local labor department.

2. 2 snap machines were not provided with finger guard.

Legal Reference: 1) Labor Minister Regulation PER-01/MEN/1988, Chapter III, regarding Qualifications, Article 3(f): Operator for boiler shall graduate the exams from local labor department cq., sub-unit maintenance, and control.) The Safety Act UU No.1/1970, regarding Occupational Safety Law Chapter III, Article 4.1: By means of regulations, occupational safety requirements are established in the planning, production, transport, circulation, trade, installation, use, utilization, maintenance, and storage of materials, goods, technical products and production apparatus which may cause accident. Labor Minister Regulation PER-01/MEN/1980 regarding Machine Protectors, Article 42.1: the machineries shall be installed with proper protectors to guarantee worker safety. Labor minister Regulation No: PER-04/MEN/1985, Article 110: running parts of sewing machinery must be entirely covered, except on the part that necessary opened.

Plan Of Action: 1. Work with factory to train boiler operation and obtain approval from environmental office.

2. a) work with factory to install finger guard on snap machines and b) request factory to develop system to check periodically.

Deadline Date: 01/31/2009

Supplier CAP: 1. Factory will plan to get the boiler certificate from the labor department for 1 boiler operator, but still is waiting list for participants.

2. Factory will provide the finger guard on each snap machine with proper conditions.

Supplier CAP Date: 08/01/2008

Action Taken:	<p>1. Factory is still waiting for information from the labor department in [Area name] area regarding a training program for the boiler operator.</p> <p><u>February 5, 2009:</u> Factory is still awaiting a boiler operator training program from the local labor department.</p> <p><u>May 18, 2009:</u> The factory has provided a training and certification program for boiler operator on behalf of "[Name]." The training was conducted February 16 – 20, 2009, by a consultant. Currently, the factory has 2 boiler operators that are trained and certified.</p> <p>2. Factory provided the finger guards on the snap machines and verified they were installed properly.</p> <p><u>February 5, 2009:</u> Company conducted a visit on January 15 and verified that snap machine safeguards were re-installed on 10 machines.</p> <p><u>May 18, 2009:</u> Factory has redesigned and reinstalled the machine guarding for all of available snap machines (10 machines). The factory also conducted a 5-minute safety talk on machine guarding on the production line. For snap machine guarding, the factory plans to conduct training in May 2009. For machine guarding monitoring, the factory plans to develop an inspection for machine guarding that will be conducted by a Safety Officer joint with the mechanic section on a weekly basis.</p>
Plan Complete:	Yes
Plan Complete Date:	10/27/2008
Action Verified:	Yes
Action Verified Text:	<p><u>Completed.</u></p> <p>1. The boiler operator has attended the training.</p> <p>2. Snap machines are covered with finger guards.</p> <p><u>New Finding:</u></p> <p>3. According to factory tour observation, some sewing machines have no belt cover.</p>
Action Verified Date:	07/27/2011

Follow-up Plan of Action: [Action plan agreed upon by factory and brands, August 2011:](#)

1. Review the implementation of current machine guarding procedure to ensure that all machine-related hazards are properly identified.
2. Enhance regular machine guarding inspection to ensure that all machines are properly equipped with safety guarding.
3. Factory has agreed to complete this by September 30, 2011.

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: [New Finding:](#) According to the factory tour observation, some cigarette butts were found inside the urine bowl and dustbin in the men's toilets.

Plan Of Action: Brands met with the factory in August 2011. The factory has agreed to:

1. Review the implementation of the current no smoking policy to ensure all employees utilize the assigned smoking areas.
2. Enhance monitoring of the No Smoking policy.

Deadline Date: 09/30/2011

Supplier CAP: Factory should conduct health promotion related with smoking risks. Factory should prepare a No Smoking policy. Factory should ensure no smoking activities in factory building, include in toilet room.

Supplier CAP Date: 08/30/2011

Action Taken: Factory already conducted socialization, No Smoking policy and health promotion related with smoking risks on August 22, 2011. Also, decided some smoking areas outside the factory building.

Plan Complete: Yes

Plan Complete Date: 08/22/2011

Health and Safety: Toilets

H&S.23 Employers shall establish the number of toilets required under applicable laws within reasonable distance of the workplace. (S)

Noncompliance

Explanation: There were an insufficient number of female toilets in the factory. There were total of 16 male toilets and 58 female toilets where there were 130 male workers and 1,378 female workers in the factory. Based on local law, factory has more than enough of male toilets, but there was a lack of 28 female toilets. Based on observation, there was no long queue found in female toilets, even though the numbers were insufficient.

Legal Reference: Labor Minister Regulation PER-07/1964, regarding Condition of Health, Cleanness and Lighting in Workplace, Article 6: (6) The scale of lavatories must be as follows: for 1-15 workers = 1 lavatory, 16-30 workers = 2 lavatories, 31-45 workers = 3 lavatories, 46-50 workers = 4 lavatories, 61-80 workers = 5 lavatories, 81-100 workers = 6 lavatories, and additionally for every 100 workers is 6 lavatories.

Plan Of Action: Work with factory to create more toilets or obtain permission on operations with current number.

Deadline Date: 01/31/2009

Supplier CAP: Factory will plan to build the new toilets as per regulation. We are still making a process to get a permit from the labor department regarding the lack of total toilets.

Supplier 08/01/2008
CAP Date:

Action February 5, 2009: Factory has been monitoring toilets and has calculated the total
Taken: number of toilets to comply with the Health Minister Decision No. 1405/Menkes/SK/XI/2002.

May 18, 2009: Factory will do an observation and survey for the number of toilets in the sewing and finishing areas. From this survey, factory will calculate the total number of toilet compared with Health of Minister Decision No. 1405/Menkes/SK/XI/2002. Factory also has a plan to get approval from Labor Department for existing toilet condition.

Plan Yes
Complete:

Plan 10/27/2008
Complete
Date:

Action No
Verified:

Action Ongoing: The factory has not rectified this issue yet. The factory has shown an appeal
Verified letter to labor department dated July 14, 2011.
Text:

Action 07/27/2011
Verified
Date:

Follow-up Action plan agreed upon by factory and brands, August 2011:
Plan of
Action:

1. Submit and obtain recommendation from respective authority on the current toilet ratio and utilization.
2. Review the current toilet ratio and utilization according to local regulation and best practices including conducting an employee survey of the toilet utilization.
3. Factory will complete by August 5, 2011.

Hours of Work: General Compliance Hours of Work

HOW.1 Employers shall comply with all local laws, regulations and procedures concerning hours of work, public holidays and leave. (S)

Noncompliance

Explanation: Based on attendance record review, in isolated cases (less than 5% of workers) maximum OT hours conducted were 4.5 hours/day February 28, 2008 and March 28, 2008 and 21.5 hours/week in March 24 – 28, 2008. For workers who worked more than 60 hours, it only occurred to a few workers from QC and finishing workers.

Legal References: Labor Act UU No.13/2003, regarding the Working Time, Chapter X, Paragraph 4, Article 78.1(b): maximum OT work allowed are 3 hours per day and 14 hours per week. Labor Minister Decree No. KEP.102/MEN/VI/2004 regarding OT hours and OT pay, Article: 3, (1) OT work can only be executed for maximum 3 hours in 1 day and 14 hours in 1 week.

Plan Of Action: Work with factory to develop work hour monitoring procedure.

Deadline Date: 01/31/2009

Supplier CAP: Factory will follow the overtime work hours as regulation. Factory has been implementing Daily Accumulative Working Hours Control Sheet and controlling it on a daily/weekly basis to prevent from doing OT more than the required limit.

Supplier CAP Date: 08/01/2008

Action Taken: Factory conducted a meeting on systems to control working hours on December 5, 2008. Factory has controlled total working hours according to the regulation since August 2008.

May 18, 2009: Based on Nike agent's review it was noted that factory has: a) an administrative person or leader, such as a supervisor/chief, in charge to monitor and control working hours on a daily and weekly basis; b) established a refresher training for the monitoring person; c) disciplinary action in place for un-procedural excessive working hours; and d) developed excessive OT root cause analysis.

Plan Complete: Yes



Plan Complete Date: 10/27/2008

Action Verified: Yes

Action Verified Text: Completed. Based on working hour record review from August 2010 to July 2011, the monitor did not identify any overtime incident exceeding the daily and weekly overtime limits.

Action Verified Date: 07/27/2011
