

FLA Audit Profile	
Country	USA
Factory name	210082321E
IEM	ACCORDIA GLOBAL COMPLIANCE GROUP
Date(s) in facility	SEPTEMBER 14-15, 2006
PC(s)	COMMEMORATIVE BRANDS INC. (CBI)
Number of workers	142
Product(s)	GRADUATION ANNOUNCEMENTS, GRADUATION ACCESSORIES, DIPLOMAS, DIPLOMA
Production processes	PRINTING

FLA Code/ Compliance issue	Country Law/Legal Reference	FLA Benchmark	IEM Findings							Remediation					[Status]	Updates (Cite Date of Follow up)		Third-Party Verification		Company Verification Follow up			
			Non-compliance	Risk of Non-compliance	Evidence of Non-compliance (un corroborated)	If not corroborated, explain why	Sources/Documentation used for corroborating	Notable Features implemented by Factory Management or Company	PC Internal audit findings (Optional)	PC Remediation plan	Target Completion Date	Factory Response (Optional)	Company follow up (Cite date of follow up)	Documentation		Completed; Pending; On-going	Company Follow up	Documentation	External Verification (Date)	Documentation	Company Follow up (Cite date of planned or follow up visit, if appropriate)	Documentation	
1. Code Awareness																							
2. Forced Labor																							
There will not be any use of forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise																							
Employment Records	According to the Immigration Reform and Control Act: All U.S. employers are responsible for verifying the employment eligibility and identity of all employees hired to work in the United States after November 6, 1986. To implement the law, employers are required to complete Employment Eligibility Verification forms (Form I-9) for all employees, including U.S. Citizens.	Employers will maintain sufficient hiring and employment records to demonstrate and verify compliance with this Code provision	Monitors reviewed 20 personnel files. Of those 20, only 11 files held I-9 forms (9 I-9 forms were missing). Out of the 11 I-9s available, 8 were incomplete.					Monitors reviewed 20 personnel files to assess compliance with employment record keeping standards. Monitors noted non-compliance concerning I-9 forms.			Initiated a full review of the employee files and identified employees with missing I-9's and/or information on the I-9. Implemented a automatic employee verification in Jan 07.	Completed June 11, 2007		June 12th, 2007		On going	Review completed and update is ongoing.						
3. Child Labor																							
No person will be employed at an age younger than 15 (or 14 where the law of the country of manufacture allows) or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15.																							
4. Harassment or Abuse																							
Every employee will be treated with respect and dignity. No employee will be subject to any physical, sexual, psychological or verbal harassment of abuse.																							
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 Fighting (29CFR 1910.1200): Fire extinguishers must be inspected monthly for operability.	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	Fire extinguishers lack maintenance tags that indicate that they are inspected monthly for operability.					Monitors viewed non-compliance with safety equipment standards upon the visual inspection of the factory.			Set monthly inspection date, added follow-up on monthly Audit Sheet, Fire Extinguisher and conducted 3 classes on how to use and test.	November 15th 2006	Same	All items completed by November 15th, 2006		Completed	Completed and implemented with monthly Audit checks and verifications						
	Medical Services and First Aid (29CFR 1910.151): Where eyes or the bodies of workers may be exposed to injurious corrosive materials, suitable facilities should be found within the work area for quick drenching or flushing of eyes and body.		Eye wash is missing in the battery charging area. Eye wash solution was found expired.					Monitors viewed non-compliance of safety equipment upon the visual inspection of the factory.			Refilled and/or purchased new solution bottles for each station, labeled all bottles with expiration date, relocated eyewash station to the area near fork lift chargers, added monthly flu inspections on the 15th of each month.	November 15th 2006	Same	Nov-06		Completed	Completed and implemented with monthly Audit checks and verifications						
Chemical Management	Hazardous Communication Program (29CFR 1910.1200): Chemicals must be properly labeled in the language spoken by workers. Label must note the identity of the chemical and the hazard warning (regarding health, flammability, reactivity and special hazard information).	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	Chemical containers were found unlabeled. Facility does not have a chemical labeling program to assure that all chemicals used outside of their normal containers are adequately labeled and kept in an appropriate container for operator use.					Monitors viewed non-compliance with chemical safety standards upon the visual inspection of the factory.			Ordered 3 types of labels for bottles, added monthly inspection to audit sheet, put on department check list for weekly inspections and labeled every bottle. New hires are trained when hired, and once a year updated training is conducted.	November 15th, 2006	Same	15-Nov		Completed	Completed and implemented with monthly Audit checks and verifications.						
Chemical Management	MSDS (29CFR 1910.1200): Facility must provide current MSDS for all chemicals and chemical products onsite. MSDS must be posted where chemicals are used/stored.		MSDS were present in the factory but were not posted where chemicals were stored and used.					Monitors viewed non-compliance with chemical safety standards upon the visual inspection of the factory.			Moved all MSDS books to visible location and made labels for each dept. to use and made sure all Dept. Supervisors and Leads are aware of the location of MSDS book. New hires are trained when hired, and once a year updated training is conducted. MSDS sheets are kept in factory accessible to employees.	November 15th, 2006	Same	Nov-06		Completed	Completed and Implemented.						
Ventilation/Electrical/facility maintenance	Housekeeping-Safety (29CFR 1910.22): No spaces on the panel shall be kept open after removing an electric breaker. Plate covers shall cover all openings to prevent accidental electrocution. No obstruction shall block access to an electrical panel. Three (3) feet clearance should be maintained in front of all panels and electric storage devices.	All ventilation, plumbing, electrical, and lighting services shall be provided and maintained to conform to applicable laws and prevent hazardous conditions to employees in the facility	Electrical panels were found with missing covers. Electrical panels lacked three feet of clearance in front.					Monitors viewed non-compliance with electrical maintenance standards upon the visual inspection of the factory.			Purchased and replaced new plate covers. Check for proper space clearance. There is a factory maintenance supervisor responsible for daily maintenance.	Nov-06	Same	Nov-06		Completed	Completed and Implemented.						

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Machinery Maintenance	Powered Industrial Truck (29CFR 1910.22): There must be a daily maintenance procedure that is followed by workers to inspect vehicles prior to use.	All production machinery and equipment shall be maintained, properly guarded, and operated in a safe manner	There is no daily maintenance procedure that is followed by workers to inspect vehicles prior to use.					Monitors looked for daily reports and informally interviewed workers to determine non-compliance with machinery maintenance standards.			Daily maintenance reports and inspections were implemented shortly after the audit findings.	6-Nov	Same	6-Nov		Completed	Completed and implemented.				
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																					
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																					
10. Overtime Compensation																					
In addition to their compensation for regular hours of work, employees will be compensated for overtime hours at such premium rate as is legally required in the country of manufacture or, in those countries where such laws will not exist, at a rate at least equal to their regular hourly compensation rate.																					
Miscellaneous																					