

FLA Audit Profile	
Country	USA
Factory name	22008215DV
ITEM	CSCC
Date(s) in facility	November 8 - 9, 2005
PC(s)	Jostens, Inc.
Number of workers	84
Product(s)	Classic rings
Production processes	Casting, Design, Tooling, CNC, Finishing, Engraving, etc.

FLA Code/ Compliance Issue	Country Law/Legal Reference	FLA Benchmark	Non-compliance	Risk of Non-compliance	IEM Findings				PC Remediation plan	Remediation			Documentation	[Status]	Updates (Cite Date of Follow up)	Documentation
					Evidence of Non-compliance (un corroborated)	If not corroborated, explain why	Sources/Documentatio used for corroborating	Notable Features implemented by Factory Management or Company		PC Internal audit findings (Optional)	Target Completion Date	Factory Response (Optional)				
1. Code Awareness																
Work 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.	The interviewed employees reported not being aware of the Code of Conduct or remembering if they took any Code Awareness Training in the past.					Employee interviews.		Compliance training, which includes information on the Jostens Code of Conduct is conducted on a yearly basis at all Jostens' plants. Employees sign an acknowledgement of having received the training for all new and existing employees. Annual compliance training was held on 10-27-05, 11-01-2005, 12-01-2005 and 12-13-2005	12/13/2005		An Acknowledgement of 2005 Compliance Training document is in each employees personnel file in the *** facility. Contents of the compliance training is also on file.	Completed		
Confidential non-compliance 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.		The facility created a toll free hotline for the employees to report issues. However, the interviewed employees did not know this number.				Employee interviews and the management interview.		Compliance training, which includes information on the secure communications line, is conducted on a yearly basis at all Jostens' plants for existing and new employees. Employees sign an acknowledgement of having received the training. Annual compliance training was held on 10-27-05, 11-01-2005, 12-01-2005 and 12-13-2005	12/13/2005		An Acknowledgement of 2005 Compliance Training document is in each employee's personnel file in the facility. Contents of the compliance training is also on file.	Completed		
Other				The facility established a suggestion box about two years ago and the suggestion box was observed in the employee lunch room. Nevertheless, the management did not receive any information from the employees through the suggestion box during the 2-year period. In addition, the interviewed employees reported not being aware of the suggestion box.				Employee interviews and the management interview.		Employees at this location are comfortable in coming directly to Management and HR with any issues or concerns. Management and HR personnel are highly visible and approachable. Plant will cover the availability of the suggestion box in the yearly compliance training and in upcoming team meetings	Compliance Training 12-31-2006 Team meetings 3-31-2006	1-1-2007 4/1/2006	Documentation on file of the March 2006 plant meeting regarding the availability and location of the plant suggestion box.	Pending Completed		
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.																
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.																
Hiring Discrimination Practices		Employment decisions will be made solely on the basis of education, training, demonstrated skills or abilities. All employment decisions will be subject to this provision. They include hiring, job assignment, wages, bonuses, allowances, and other forms of compensation, promotion, discipline, assignment of work, termination of employment, provision of retirement.		The employees from the same department reported not being content with their supervisor. Employees said that all supervisors did not follow the same company rules and regulations; thus, they felt that their own supervisor used different guidelines to communicate with them. They also reported their grievances by stating they did not feel treated equally as in some departments employees got to leave earlier because they had different supervisors. This reported issue could lead to possible discrimination among employees and supervisors and possible inequality in the treatment.				Employee interview.		The situation referenced has been resolved. Specific HR matters regarding Jostens employees are confidential; therefore, we are not able to discuss any specific actions in detail. All Jostens employees are required to be in compliance with Jostens' Code of Business Conduct and Ethics, Jostens' Workplace Code of Conduct and HR policies and procedures. However, please note that this Supervisor no longer works for Jostens.	2/3/2006		Documentation on file of corrective action	Completed		
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																
H851 General Compliance Health and Safety																
H8510 Safety Equipment and First Aid Training																
H8517 Ventilation/Electrical/Facility Installation and Maintenance																
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																

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					Evidence of Non-compliance (un corroborated)	If not corroborated, explain why	Sources/Documentatio n used for corroborating	Notable Features implemented by Factory Management or Company			Target Completion Date	Factory Response (Optional)	Company follow up (Cite date of follow up)		Documentation	Completed; Pending; On-going
Record Maintenance		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).	It was found that I-9s Section 1 and/or 2 of temporary employees from (Staffing Company 2), one of the labor service companies, were not complete.			Documentation review.			Required written documentation from both (Staffing Company 1) and (Staffing Company 2) of compliance to this requirement.	2/15/2006		Written documentation from both companies to comply with this requirement on file at Jostens and available upon request.	Completed			
Payroll Reporting		Accurate and reliable payroll reporting, including pay stubs will be provided				(Staffing Company) refused to provide payroll records for review. (Payroll Company) agreed to provide interviewed employees' payroll documents for review. However, by the time the report was complete, the auditors had not received it from (Payroll Company) or (factory).			(Payroll Company) will provide payroll documentation however, as they were running payroll at the time of the request, they could not supply the required information, but will do so going forward. Jostens will take appropriate remedial measures to address suppliers that are unable or unwilling to comply with the Jostens Workplace Code of Conduct.	2/15/2006		Documentation on file.	Completed			
Other						(Staffing Company) refused to provide W-4 form for the interviewed temporary employees.			Required written documentation from (Staffing Company) of compliance to this requirement.	2/15/2006		Written documentation of commitment to comply with this requirement on file at Jostens and available upon request.	Completed			
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																
Overtime Limitations		Except in extraordinary business circumstances, employees will (i) not be required to work more than the lesser of (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture or, where the laws of such country will not limit the hours of work, the regular work week in such country plus 12 hours overtime; and (ii) be entitled to at least one day off in every seven day period. An extraordinary business circumstance is a temporary period of extra work that could not have been anticipated or alleviated by other reasonable efforts	The employees worked more than 52 hours a week (40 regular hours plus 12 hours overtime) during the week ending 11/16/05. The maximum weekly working hours found on the reviewed records were 57.50.					Documentation review.	Plant will conduct a weekly review of production hours to help manage overtime requirements and to provide employees, when feasible, information related to upcoming overtime hours expectations and approximately a 24 hour prior notice. Jostens makes every attempt to comply with the overtime hours stated in the Jostens Workplace Code of Conduct. Due to the highly specialized nature of work and the seasonality of the business, Jostens attempts to remain as flexible as possible in order to avoid layoffs (where possible), reduce turnover and to mitigate the impact of retiring employees.	2/28/2006		Weekly reviews of production hours have been implemented.	Completed			
Voluntary OT		Overtime hours worked in excess of code standard will be voluntary	According to the company, overtime policies and employee testimonies, overtime is mandatory when it is scheduled by management.	1. According to the facility overtime policies, the employees shall receive 24 hours up to one week notice in advance if mandatory overtime is scheduled. However, the interviewed employees reported that they received notice by the beginning of the day that the overtime hours need to be worked in 95% of the cases. 2. The employees from the finishing area reported group daily quota. They are not allowed to go home if the group daily quota is not achieved.				Employee interview, management interview, and documentation review.	Plant will conduct a weekly review of production hours to help manage overtime requirements and to provide employees, when feasible, information related to upcoming overtime hours expectations and approximately a 24 hour prior notice. Jostens makes every attempt to comply with the overtime hours stated in the Jostens Workplace Code of Conduct. Due to the highly specialized nature of work and the seasonality of the business, Jostens attempts to remain as flexible as possible in order to avoid layoffs (where possible), reduce turnover and to mitigate the impact of retiring employees.	2/28/2006		Weekly reviews of production hours have been implemented and employees are notified of expected overtime with approximately 24 hour prior notice.	Completed			
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																

Third-Party Verification		Company Verification Follow up	
External Verification (Date)	Documentation	Company Follow up (Cite date of planned or follow up visit, if appropriate)	Documentation
Interviews were conducted with a sample of several workers. Monitor requested if workers have knowledge of the Code and if training had been provided. All workers replied that they received training by way of Powerpoint presentation and that they have been provided with access to the code of conduct by way of posting. Monitor reviewed training records and found that workers were trained on the Jostens Code at various dates in 2005 – specifically monitor reviewed samples of training records dated 12/01, 12/13 and 12/27 in 2005	Training Records / Employee Interviews		
Interviews were conducted with a sample of several workers. Monitor requested if workers have knowledge of the Code and if training had been provided. All workers replied that they received training by way of Powerpoint presentation and that they have been provided with access to the code of conduct by way of posting. Monitor reviewed training records and found that workers were trained on the Jostens Code at various dates in 2005 – specifically monitor reviewed samples of training records dated 12/01, 12/13 and 12/27 in 2005	Training Records / Employee Interviews		
Interviews were conducted with a sample of several workers. Monitor requested if workers have been provided with adequate information on the suggestion box. Additionally, management provided agenda and meeting minutes where the suggestion box location and procedure for use was discussed in a plant-wide meeting in March, 2006. Workers confirmed (verified) that the meeting did take place and they were aware of the procedure.	Agenda and Meeting Minutes / Employee Interviews		
Supervisor was terminated subsequent to the audit (IEM) however, it was not disclosed if the termination was a result of this finding. Workers did indicate through interviews that the issue no longer exists and that the working environment has improved since the supervisor's departure	Management Interview / Employee Interviews		
NEW FINDINGS: a) The facility has not posted an evacuation plan to inform occupants of designated exit paths and emergency exit doors b) Unlabeled main doors for entry to various rooms (compressors, casting room, EDM room) can be confused as building exits		Completed 11-29-2007. a) Evacuation map completed and posted. b) Mandoors labeled appropriately with "Not an Exit" signs.	Documentation on file, available upon request.
NEW FINDING: a) The facility has not trained workers in fire fighting techniques; b) Fire extinguishers installed throughout the facility are not identified by location signs and c) Fire extinguishers have not been inspected on a monthly basis and recorded on inspection tags		Completed 10-30-2007 a) The local Fire Dept. provided fire safety training to the plant b) Fire extinguishers are identified on the evacuation map which has been posted throughout the building c) All fire extinguishers have been inspected and monthly inspections will be conducted.	Documentation on file, available upon request.
NEW FINDING: Electric service panels were found to not be updated with labeling to identify circuits		Completed by 10-30-2007 All electrical panels have been appropriately labeled.	Documentation on file, available upon request.

Third-Party Verification		Company Verification Follow up	
External Verification (Date)	Documentation	Company Follow up (Cite date of planned or follow up visit, if appropriate)	Documentation
Facility is not currently using staffing agencies. Monitors reviewed written documentation from staffing companies used in the past requiring compliance related to I-9s	Letters from staffing agencies / Management Interviews		
Facility is not currently using staffing agencies.			
Facility is not currently using staffing agencies.			
Review of payroll records was performed for three time periods that included the most recent period, a peak period (production) and a random period. No violation of Hours of Work was found in the sample review. Workers also indicated that overtime is not usually performed beyond 8 hours per week.	Payroll Records / Time Keeping Records		
Workers interview indicated that mandatory overtime is not being required in all cases. Normally, adequate advance notice is given when Overtime work is necessary. Additionally, the supervisor that was responsible for this practice was dismissed – verified by management records of employment as well as worker testimony. No limitation on freedom to leave work based on quota being achieved is in existence at this location based on worker interviews.	Worker Interviews / Management Interviews		