

Fair Labor Association: Independent External Factory Assessment

Assessment Date :

12 Aug 2021



Factory Information

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| FLA Affiliates | Amer Sports |
| Country | Indonesia |
| Number of Workers | |

Understanding this Report

Companies that join the FLA agree to uphold the FLA Workplace Code of Conduct throughout their entire supply chain. The Code of Conduct is based on International Labour Organization (ILO) standards, and defines labor standards that aim to achieve decent and humane working conditions.

FLA Code Element

Number of Violations

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| Compensation (C) | 10 |
| Employment Relationship (ER) | 30 |
| Freedom Of Association And Collective Bargaining (FOA) | 2 |
| Harassment Or Abuse (H/A) | 1 |
| Health, Safety And Environment (HSE) | 32 |
| Hours Of Work (HOW) | 8 |
| Nondiscrimination (ND) | 2 |

Assessment Information

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| Assessor | Donny Triwandhani |
| Assessment Date | 12 Aug 2021 |
| Assessment Purpose | Factory Assessment (In-Person) |

ASSESSMENT RESULTS

Compensation (C)

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| Benchmark ID | C.16.1 |
| Benchmark Details | All compensation records, including wages and benefits whether in cash or in-kind, must be properly documented and their receipt and accuracy must be confirmed by the relevant worker in writing (e.g. signature, thumbprint). |
| Finding Details | Please review C.7 for details |
| Recommendation for Immediate Action | |
| Compliance Classifications | Immediate Action Required |
| Local Law | |
| Benchmark ID | C.7 |
| Benchmark Details | All payments to workers, including hourly wages, piecework, fringe benefits and other incentives shall be calculated, recorded, and paid accurately. |

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| Finding Details | Workers' working hours and their compensation could not be fully verified, since: - The finger scan time record system is not reliable or accurate since around 70% of time records did not reflect both time in and time out. The factory uses daily manual attendance records with mark "1" to mean present and "2 or 3" to mean overtime for 1 or 3 hours. Additionally the factory uses overtime agreement forms for calculating overtime hours instead of the electronic time recording system. The factory does not require workers to scan their finger to record hours of work. - The factory does not provide training workers with their own time record. The factory manually records training worker attendance using uniform time in and out, such as 7:30 to 16:30. - The factory does not maintain adequate records for swapping work hours due to electricity blackouts. |
| Recommendation for Immediate Action | Maintain accurate working records so that compensation, benefits, and hours of worked can be fully verified. |
| Compliance Classifications | Immediate Action Required |
| Local Law | Regulation of the Minister of Manpower No. KEP-06/MEN (1990) |
| Benchmark ID | C.5 |
| Benchmark Details | Contract/contingent/migrant/temporary workers shall: Receive at least the minimum wage for regular workers or the prevailing industry wage for regular workers, whichever is higher; Receive all legally mandated benefits; and Receive at least the same compensation as regular workers performing the same job functions or tasks with similar levels of experience or seniority. |
| Finding Details | Before June 2021, the factory did not pay the correct minimum wage to trainees; they were paid only a daily rate IDR 50,000 (USD 3.50). Based on 2021 local minimum wage, the workers should be paid IDR 1,770,000 (USD 126)/month or IDR 84,286 (USD 6.00)/day. The factory calculated deficient minimum wage and overtime and paid back to workers for the period from October 2020 to present but not from the past 12 months (back to August 2020). |
| Recommendation for Immediate Action | Retroactively pay the deficient minimum wage at least from the past 12 months or from August 2020. |

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| Compliance Classifications | Immediate Action Required |
| Local Law | Law No. 13 on Manpower (2003), Art. 90(1) |
| Benchmark ID | C.9.3 |
| Benchmark Details | Employees shall be compensated for overtime hours at such premium rate as is legally required in the producing country |
| Finding Details | <p>1. Before June 2021, the factory calculated all workers' overtime at a rate of 1.3X for all overtime hours instead of the legal overtime rate 1.5X and 2.0X. The factory calculated the outstanding deficient minimum wage and overtime and paid back to workers. However, they only paid back workers for periods from October 2020 and not from the past the 12 months prior this assessment (August 2020).</p> <p>2. Electricity blackouts happened several times during normal working hours and the factory has required workers to work an extra one hour after normal hours on regular days or 2.5 hours on the rest day (Saturday) as substitutes without being paid overtime. The factory does not maintain adequate records for these swapping work hours. Assessors noted seven worker grievances about this policy because the blackouts are not the workers' fault and the factory does not have an electric generator. Written notes are found on overtime agreement forms regarding overtime hour deduction for substitution of owed hours such as below: Overtime for 8 hours on May 22, 2021 (off day- Saturday) from 7:30am to 4:00pm with 30 minutes break in printing section is calculated only 7 overtime hours after 1 hour deduction of owed hour, and workers' overtime in cutting section is calculated 5.5 hours after 2.5 hour deduction of owed hours.</p> |
| Recommendation for Immediate Action | 1. Retroactive pay the deficient overtime wage at least from past 12 months or from August 2020. 2. Ensure to pay all overtime hours without any deductions. |
| Compliance Classifications | Immediate Action Required |
| Local Law | Decision of the Minister of Manpower and Transmigration No. KEP 102/MEN/VI on Overtime work and Overtime pay (2004), Art. 11; Government Regulation No.78 Year 2015 Article 20 |

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| Benchmark ID | C.22 |
| Benchmark Details | Employers must establish a system through which workers can dispute compensation and receive clarifications in this respect in a timely manner. |
| Finding Details | The factory does not have a grievance policy or procedures. There is no system known by workers to submit grievances or questions regarding wage payments or benefits. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |
| Benchmark ID | C.1.1 |
| Benchmark Details | Employers shall comply with all national laws, regulations and procedures concerning the payment of compensation to workers. |
| Finding Details | Based on August 2021 contribution records, around 175 out of 931 total employees are not covered with Social Security (BPJS Tenaga Kerja) and 160 workers are not registered to Healthcare program (BPJS Kesehatan). |
| Recommendation for Immediate Action | Register all workers to receive Social Insurance and Healthcare program BPJS. |
| Compliance Classifications | Immediate Action Required |
| Local Law | Law No.24 Year 2011 Article 15 |
| Benchmark ID | C.17 |
| Benchmark Details | Employers shall ensure that all legally required payroll documents, journals and reports are available, complete, accurate and up-to date. |

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| Finding Details | Please review C.7 and C.9.3 for details. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Immediate Action Required |
| Local Law | |
| Benchmark ID | C.19.1 |
| Benchmark Details | Employers shall make every reasonable effort to ensure workers understand their compensation, including: the calculation of wages, incentives systems, benefits, and bonuses they are entitled to at the workplace and under applicable laws. |
| Finding Details | There is no introduction/orientation training for new workers or ongoing training on wages and benefits calculations. In addition, workers are not informed, orally and in writing, about overtime wage rates prior to undertaking overtime. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | N/A |
| Benchmark ID | C.21.1 |
| Benchmark Details | Employers shall provide all legally mandated benefits, including holidays, leave, bonuses, severance payments and 13th month payments to all eligible workers within legally defined time periods. |

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| Finding Details | All workers are hired under a fixed-term contract, and no compensation money or severance pay is provided for workers under a fixed-term contract (PKWT - Perjanjian Kerja Waktu Tertentu) when their contract ends as stipulated in the new Government Regulation. This regulation states that workers under the PKWT must be provided with compensation upon expiration of the PKWT. |
| Recommendation for Immediate Action | Provides compensation money to the fixed-term contract (PKWT) workers when their contract ends. |
| Compliance Classifications | Immediate Action Required |
| Local Law | Government Regulation No.35 Year 2021 Article 15 and 16 |
| Benchmark ID | C.10 |
| Benchmark Details | Workers shall be informed, orally and in writing, in language(s) spoken by workers about overtime wage rates prior to undertaking overtime. |
| Finding Details | Please review C.19.1 for details. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | N/A |

Employment Relationship (ER)

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| Benchmark ID | ER.17.5 |
| Benchmark Details | Employers shall have in place procedures to track the number, types, and timing and resolution of grievances, and to communicate the resolution of grievances to the workforce. |

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| Finding Details | Please review ER.17.1 for details. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |
| Benchmark ID | ER.19.2 |
| Benchmark Details | All notices that are legally required to be posted in the workplace work areas shall be posted by employers. |
| Finding Details | All notices such as factory regulation (Peraturan Perusahaan) and a copy of Safety Act No. 1 year 1970 (Undang Undang Keselamatan Kerja) required to be posted in the workplace are not being displayed at prominent areas accessible to workers. |
| Recommendation for Immediate Action | Post all legally required notices such as factory regulation (Peraturan Perusahaan) and a copy of Safety Act No. 1 year 1970 (Undang Undang Keselamatan Kerja) at prominent areas accessible to workers. |
| Compliance Classifications | Immediate Action Required |
| Local Law | Act. No. 1 on Safety (1970), Art. 14(a) |
| Benchmark ID | ER.9.3 |
| Benchmark Details | Contract/contingent/temporary workers shall only be hired if one of the following conditions is met the permanent workforce of the enterprise is not sufficient to meet unexpected or unusually large volume of orders, exceptional circumstances* may result in great financial loss to the supplier if delivery of goods cannot be met on time, or work that needs to be done and is outside the professional expertise of the permanent workforce. |
| Finding Details | Please review ER.10.1 for details. |

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| Recommendation for Immediate Action | |
| Compliance Classifications | Immediate Action Required |
| Local Law | |
| Benchmark ID | ER.11.2 |
| Benchmark Details | Employers must ensure the following minimum terms and conditions are met in the employment of contract/contingent/migrant/temporary workers: Contract/contingent/migrant/temporary workers shall be provided an employment agreement in their native language setting out the employment terms and conditions. for migrant workers, a copy of their employment contract in their native language shall be provided prior to departure from their country of origin; |
| Finding Details | 1. There were 72 trainees at the time of the assessment and none have been provided with an employment contract (PKWT). 2. The factory does not provide workers with a copy of the employment contract. |
| Recommendation for Immediate Action | 1. Sign an employment contract with workers on the first day of hire. 2. Provide a copy of employment contract to all workers. |
| Compliance Classifications | Immediate Action Required |
| Local Law | Government Regulation No.35 Year 2021 Chapter II Article 2 (1 &2); Law No. 13 on Manpower (2003), Art. 54 (3) |
| Benchmark ID | ER.1.2 |
| Benchmark Details | Employers shall assign responsibility for the administration of human resources to a clearly defined and adequately qualified staff member or staff members and ensure workers at all levels receive communication and training about existing policies and procedures or any revisions. |

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| Finding Details | The factory does not clearly define qualified staff responsible for social compliance issues at the workplace. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |
| Benchmark ID | ER.18.2 |
| Benchmark Details | Employers shall ensure managers and supervisors are fully familiar with the workplace disciplinary system and in applying appropriate disciplinary practices. |
| Finding Details | The factory does not train managers or supervisors on the disciplinary system. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |
| Benchmark ID | ER.2 |
| Benchmark Details | Employers shall ensure that all legally mandated requirements for the protection or management of special categories of workers, including migrant, juvenile, contract/contingent/temporary, probationary workers, home workers, and pregnant or disabled workers, are implemented. Where local laws and FLA standards differ, the employer is expected to follow the highest applicable standard. |

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| Finding Details | According to management, the factory has not hired any disabled workers. This practice does not comply with local law which requires the factory to hire one person with a disability for every 100 workers. Thus, for a factory of 931 total employees, the factory must employ at least nine workers with disabilities. |
| Recommendation for Immediate Action | Establish a program to provide training and employ workers with disabilities. |
| Compliance Classifications | Immediate Action Required |
| Local Law | Law No. 4 of 1997 concerning persons with disabilities. Article 14 |
| Benchmark ID | ER.5.1 |
| Benchmark Details | Employers shall ensure that all supervisors are trained in national laws, workplace regulations, and the FLA Code, workplace grievance systems, and the appropriate practices to ensure compliance. |
| Finding Details | The factory does not provide training to relevant supervisors on the FLA's code elements or employment functions. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |
| Benchmark ID | ER.17.1 |
| Benchmark Details | Employers shall have a clear and transparent system of worker and management communication that enables workers to consult with and provide input to management. This might include suggestion boxes, worker committees, designated spaces for worker meetings, union representatives, and meetings between management and workers' representatives. |

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| Finding Details | 1. The factory does not have procedures on grievance system. 2. The grievance system has not been implemented since: - There are no grievance policy or procedures. - Only one grievance box is available and it is in an open area at the sewing section. As a result, anyone can easily see workers who submit grievances. - Management stated that they have not received any grievances. However, the assessor found around 52 grievances when the grievance box was opened on the first day of the assessment. - Workers stated that they are required to write names and departments on any grievances submitted. - There is no management response and follow up on workers' grievances. - The factory does not provide workers with training on grievance mechanisms. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |
| Benchmark ID | ER.17.6 |
| Benchmark Details | Employers shall have a system in place to prevent retaliation against or discrimination towards workers who are filing grievances, including grievances regarding harassment, abuse, violations of factory procedures, compensation, or unsafe working conditions |
| Finding Details | The factory does not have a policy or procedures on anti-retaliation. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |
| Benchmark ID | ER.15.1 |

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| Benchmark Details | Employers shall have in place a procedure for determining termination payouts, including methods for correct assessment of payouts for all modes of termination/retranchment, taking into account national legal requirements. |
| Finding Details | The factory does not provide any COVID-19 specific training to supervisors. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | N/A |
| Benchmark ID | ER.1.1 |
| Benchmark Details | Employers shall have in place written policies and practices and maintain proper and accurate records governing all aspects of employment from recruitment, hiring and probation, including written terms and conditions of employment, job descriptions, administration of compensation, and working hours for all positions, through to retranchment and termination processes. |
| Finding Details | 1. The factory has a written policy on recruitment and hiring but no procedures. 2. There are no procedures on nondiscrimination. 3. The factory does not have procedures on forced labor. 4. The factory does not have procedures on child labor or child labor remediation. 5. The factory does not have policies or procedures governing all aspects of termination and retranchment. 6. The factory does not have policies or procedures on compensation. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |
| Benchmark ID | ER.9.2 |

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| Benchmark Details | Employers shall have in place written policies and procedures regulating the recruitment and hiring of contract/contingent/temporary workers. |
| Finding Details | There are no policies and procedures on recruitment and hiring of contract/contingent/temporary workers. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |
| Benchmark ID | ER.18.1 |
| Benchmark Details | Employers shall have written disciplinary rules, procedures and practices that embody a system of progressive discipline (e.g. a system of maintaining discipline through the application of escalating disciplinary action moving from verbal warnings to written warnings to suspension and finally to termination). |
| Finding Details | The factory does not have policies or procedures on workplace conduct and discipline. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |
| Benchmark ID | ER.6.1 |
| Benchmark Details | Employers shall have written policies and procedures and implement practices that encourage ongoing training of all categories of workers with the goal of raising or broadening skills in order to advance in their careers within the factory or beyond. |

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| Finding Details | The factory does not have written policies and procedures on personnel development that encourage ongoing training with the goal of raising or broadening workers' skills so they can advance in their careers. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | N/A |
| Benchmark ID | ER.7.1 |
| Benchmark Details | Employers shall have written policies and procedures with regard to performance reviews that outline the review steps and process, demonstrate linkages to job grading, prohibit discrimination, are provided in writing and seek feedback and agreement/disagreement from employees in writing, and that follow all local legal requirements. |
| Finding Details | 1. The factory does not have policies or procedures on performance reviews. 2. The factory conducts performance reviews but workers are not provided with access to their evaluations or have the right to provide feedback. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |
| Benchmark ID | ER.8 |

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| Benchmark Details | Employers shall have written policies and procedures with regard to promotion, demotion, and job reassignment that outline the criteria, demonstrate linkages to job grading, and prohibit discrimination or use of demotion or job reassignment as a form of penalty or punishment, are provided in writing and seek feedback from employees in writing, and follow all local legal requirements. |
| Finding Details | There are no policies and procedures on promotion, demotion and job reassignment. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |
| Benchmark ID | ER.9.1 |
| Benchmark Details | Employers shall hire contract/contingent/temporary workers only if such hiring is consistent with the national law of the country of production. |
| Finding Details | Please review ER.10.1 for details. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Immediate Action Required |
| Local Law | |
| Benchmark ID | ER.4 |

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| Benchmark Details | Employers shall inform workers about workplace rules, environmental protection systems, health and safety information, and laws regarding workers' rights with respect to freedom of association, compensation, working hours, and any other legally required information, and the FLA Code through appropriate means, including posted in local language(s) throughout the workplace's common areas. |
| Finding Details | 1. The factory does not post the FLA Code and does not have policies or procedures on most employment functions. 2. The factory does not provide COVID-19 specific training to any workers. The factory does not provide training to supervisors and managers on any revisions to the emergency management plan related to COVID-19. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |
| Benchmark ID | ER.19.1 |
| Benchmark Details | Employers shall maintain on file all documentation needed to demonstrate compliance with the FLA Workplace Code and required laws. |
| Finding Details | The factory does not keep all workers' documentation such as application form, copy national ID card and employment contract in one file. The factory keeps the employment contract in a separate file. |
| Recommendation for Immediate Action | Keep all workers' documentation in an individual personnel file. |
| Compliance Classifications | Immediate Action Required |
| Local Law | |

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| Benchmark ID | ER.10.1 |
| Benchmark Details | Employers shall not hire contract/contingent/temporary workers as a means to support continuing business needs on a long-term basis. |
| Finding Details | All 931 employees including 61 staffs are employed under a PKWT fixed-term contract, even though they are working permanent jobs. |
| Recommendation for Immediate Action | Convert all workers who perform jobs of a permanent nature but are currently hired under a PKWT contract to permanent worker status. |
| Compliance Classifications | Immediate Action Required |
| Local Law | Government Regulation No 35 year 2021 Chapter II Article 4 (2) |
| Benchmark ID | ER.10.2 |
| Benchmark Details | Employers shall not renew contracts for multiple successive short-terms in lieu of providing regular employment. |
| Finding Details | Please review ER.10.1 for details. |
| Recommendation for Immediate Action | |
| Compliance Classifications | |
| Local Law | |
| Benchmark ID | ER.3.1 |
| Benchmark Details | Employers shall provide an orientation to new employees at the time of hiring, which includes explanations of the employers' rules, compensation package and policies for human resources, grievance systems, industrial relations, including respect of the right to freedom of association, workers' rights and responsibilities, FLA Code of Conduct, health and safety, and environmental protection. |

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| Finding Details | There is no orientation training for new workers. As a result, there is no training on FLA's code elements or employment functions and no training on extraordinary or temporary health and safety precautions in the factory. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |
| Benchmark ID | ER.1.3 |
| Benchmark Details | Employers should implement an annual, review process with input from workers of all policies, procedures and their implementation to ensure they meet legal requirements and the FLA Workplace Code. |
| Finding Details | 1. The factory does not have a policy or procedures on regularly reviewing policies and procedures. As a result, management does not periodically review its policies and procedures for all Employment Functions. 2. The factory has not established procedures to request and/or receive workers' input/feedback regarding the creation, implementation, and updating of its policies and procedures. Workers are neither systematically integrated nor consulted in decision-making processes. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | N/A |
| Benchmark ID | ER.18.3.4 |
| Benchmark Details | Records of disciplinary action must be maintained in the worker's personnel file. |

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| Finding Details | The factory maintains records of disciplinary actions in a separate file instead of in workers' personnel files. |
| Recommendation for Immediate Action | Maintain the records of disciplinary actions in workers' personnel files. |
| Compliance Classifications | Immediate Action Required |
| Local Law | |
| Benchmark ID | ER.18.6 |
| Benchmark Details | The workplace shall commit to non-retaliation for all steps of the disciplinary process, including for a worker requesting a witness and filing an appeal of disciplinary action. |
| Finding Details | There is no factory management commitment to non-retailation during the disciplinary process including if a worker requests a witness or files an appeal of disciplinary action. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |
| Benchmark ID | ER.16.2 |
| Benchmark Details | When employers are faced with major changes in production, program, organization, structure, or technology and those changes are likely to result in temporary or permanent layoffs, employers shall communicate any alternatives to retrenchment that have been considered and consult any workers' representatives as early as possible with a view to averting or minimizing layoffs. |

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| Finding Details | Workers are neither systematically integrated nor consulted in decision-making processes. The bipartite committee was established in August 2020 but has yet to have a meeting. The factory has not established procedures to request and/or receive workers' input/feedback. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | N/A |
| Benchmark ID | ER.16.3 |
| Benchmark Details | Where temporary or permanent layoffs are unavoidable, a plan should be developed and implemented that mitigates the adverse effects of such changes on workers and their communities. |
| Finding Details | The factory has not developed policies or procedures on Termination and Retrenchment. As a result, in cases of unavoidable layoffs, there is no communication to the workers a plan that mitigates the adverse effects of layoffs. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |
| Benchmark ID | ER.18.3.2 |
| Benchmark Details | Workers have the right to participate and be heard in any disciplinary procedure against them. |
| Finding Details | There is no record as evidence that workers are able participate in any disciplinary procedure against them. |

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| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |
| Benchmark ID | ER.3.3 |
| Benchmark Details | Workers should be provided with written documentation that substantiates all the issues covered in orientation briefings. |
| Finding Details | Please review ER.3.1 for details |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |

Freedom Of Association And Collective Bargaining (FOA)

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| Benchmark ID | FOA.1.1 |
| Benchmark Details | Employers shall comply with all national laws, regulations and procedures concerning freedom of association and collective bargaining. national laws, rules, and procedures protecting the rights of workers to organize and bargain collectively. Where local laws and FLA standards differ, the employer is expected to follow the highest applicable standard. |
| Finding Details | Factory management has a written commitment on freedom of association and collective bargaining. However, the factory does not have procedures on freedom of association or collective bargaining. |
| Recommendation for Immediate Action | |

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| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |
| Benchmark ID | FOA.11 |
| Benchmark Details | Employers shall not interfere with the right of workers to: draw up their constitutions and rules; to elect their representatives; or to organize their administration and activities |
| Finding Details | The bipartite committee is inadequate because of the following: - It is not clear which representatives are from management and which are workers. - The workers' representatives are not freely elected by workers because management selected all representatives. - The bipartite committee has been established since August 2020 but has yet to conduct a meeting. |
| Recommendation for Immediate Action | Ensure the membership of the bipartite forum consists of the elements of entrepreneur and workers who are appointed democratically by the workers to represent the interests of the workers in the factory. Conduct regular meetings to discuss labor issues in the factory. |
| Compliance Classifications | Immediate Action Required |
| Local Law | Regulation of Ministry of Manpower No. 32/MEN/XII/2008 on Procedure for the Establishment and Membership of Bi-partite Committee (2008), Article 5 and 17; Law No. 13 on Manpower (2003), Art. 106(1) - (2) - (3) |
| Harassment Or Abuse (H/A) | |
| Benchmark ID | H/A.8.3 |

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| Benchmark Details | Employers, shall develop, implement and monitor policy and procedures for eliminating the risk of violence, harassment, and abuse in the workplace. Policies and procedures shall include a clear statement that violence, harassment, and abuse will not be tolerated, procedures for the investigation of allegations, and measures to protect any complainants, victims, and witnesses. |
| Finding Details | The written policy on harassment or abuse does not include a system to discipline supervisors, managers, and workers who engage in any form of harassment or abuse. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |

Health, Safety And Environment (HSE)

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| Benchmark ID | HSE.30.1 |
| Benchmark Details | Employers shall develop, maintain, and regularly review health, safety, and environmental policies to ensure that they comply with all national laws, regulations and the FLA Workplace Code concerning health, safety, and environmental standards, regulations and procedures. |
| Finding Details | The factory does not have procedures regarding environmental protection. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | N/A |

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| Benchmark ID | HSE.6.2 |
| Benchmark Details | A sufficient number of workers shall be trained in first aid and firefighting techniques. Training shall be upon hire and with periodic refresher training. |
| Finding Details | The factory does not provide training on the provision of first aid. In addition, there are no certified first aid personnel. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | Manpower Minister's Regulation No. PER- 15 /MEN/VIII/ on first aid in workplace (2008), Annex I; Act No. 1 on Safety (1970), Art. 9(3) |
| Benchmark ID | HSE.5.3 |
| Benchmark Details | Alarm systems shall be regularly tested and evacuation drills shall be undertaken at least annually. |
| Finding Details | There is no safety induction/orientation program that includes evacuation procedures for new workers. The last evacuation drill was conducted on July 11, 2020, and there is no evacuation drill conducted in 2021. As result, not all workers have participated in a full evacuation drill. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | Act No. 1 on Safety (1970), Art. 9(3) |
| Benchmark ID | HSE.5.1.5 |

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| Benchmark Details | All applicable, legally required or recommended elements of safe evacuation shall be complied with, including all of the following elements: employee education and training |
| Finding Details | Not all workers have received basic fire safety training. Based on last training record and photos, only around ten workers participating in the training on July 3, 2020. There was no training conducted in 2021. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | Act No. 1 on Safety (1970), Art. 9(3) |
| Benchmark ID | HSE.5.1 |
| Benchmark Details | All applicable, legally required or recommended elements of safe evacuation shall be complied with, including all of the following elements: posting evacuation plans; the installation and maintenance of fire alarms; the installation and maintenance of emergency lighting; ensuring aisles/exits are not blocked and that workers are not blocked within their workstations; employee education and training; and evacuation procedures and fire drills. |
| Finding Details | 1. The factory does not have procedures or post signs on the prohibition of smoking within 15 meters (~50 ft.) of all closed areas. 2. There is no emergency light or exit sign installed above the exit in the training room. |
| Recommendation for Immediate Action | 1. Post signs on prohibition of smoking within 15 meters (~50 ft.) of all closed areas. 2. Ensure emergency light and exit sign are installed above exits. |
| Compliance Classifications | Immediate Action Required |
| Local Law | Regulation of the Minister of Labour No. 7 (1964), Art.13(1) - (4) |
| Benchmark ID | HSE.5.1.6 |

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| Benchmark Details | All applicable, legally required or recommended elements of safe evacuation shall be complied with, including all the following elements: evacuation procedures and fire drills |
| Finding Details | The last evacuation drill was conducted on July 11, 2020, and there was no assessment after the drill to learn how to improve the evacuation process. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | Act No. 1 on Safety (1970), Art. 9(3) |
| Benchmark ID | HSE.5.1.3 |
| Benchmark Details | All applicable, legally required or recommended elements of safe evacuation shall be complied with, including all the following elements: installation and maintenance of emergency lighting |
| Finding Details | 1. The emergency lights are inadequate since the emergency light is home standard type (small) and not industrial. The power is less than five lux. 2. There is no emergency light in the stairways or corridors. |
| Recommendation for Immediate Action | Install adequate emergency lights with a power of at least 5 lux above exits, stairways and corridors. |
| Compliance Classifications | Immediate Action Required |
| Local Law | Regulation of the Minister of Labour No. 7 (1964), Article 14(2) - (3) - (4) - (5); Regulation of the Minister of Labour No. 7 (1964), Article 13(1) - (4); Regulation of The Minister of Labor No.7 on Health Condition, Cleanlines and Lighting in Work Place (1964), Article 13.4 |
| Benchmark ID | HSE.5.1.2 |

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| Benchmark Details | All applicable, legally required or recommended elements of safe evacuation shall be complied with, including all the following elements: installation and maintenance of fire alarms; |
| Finding Details | 1. The factory has an individual fire alarm system in each building instead of a centralized fire alarm system. 2. There is no visual fire alarm installed. 3. The emergency alarm system does not have a backup battery in case the power goes off. |
| Recommendation for Immediate Action | 1. Install centralized fire alarm system to cover whole factory's premises, and add visual fire alarm. 2. Ensure the fire alarm has a backup battery in case the power goes off the alarm still can work properly. |
| Compliance Classifications | Immediate Action Required |
| Local Law | Regulation of the Minister of Manpower No. PER-02/MEN on Automatic Fire Alarm Installations (1983), Article 11 and 45(3) |
| Benchmark ID | HSE.5.1.4 |
| Benchmark Details | All applicable, legally required or recommended elements of safe evacuation shall be complied with, including all the following: ensuring aisles/exits are not blocked and that workers are not blocked within their workstations |
| Finding Details | 1. Production raw materials are obstructing one exit near the material warehouse in building A. 2. Production raw materials are obstructing one evacuation route/aisle leading to the exit near material warehouse in building A. |
| Recommendation for Immediate Action | Ensure all exit doors and evacuation routes are clear of any obstructions. |
| Compliance Classifications | Immediate Action Required |
| Local Law | Ministerial Decree of Public Works No. 10/KPTS on Technical Security Provisions of Fire Hazard in Buildings and Environment (2000), Annex Chapter I, Art. 2.6; Regulation No. PER-01/MEN (1980), Art. 5(1); Regulation No. PER-01/MEN (1980), Art. 6 |

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| Benchmark ID | HSE.9.1 |
| Benchmark Details | All chemicals and hazardous substances shall be properly labeled and stored in secure and ventilated areas and disposed of in a safe and legal manner, in accordance with applicable laws and international standards. |
| Finding Details | The chemicals in paint warehouse do not have secondary containment. |
| Recommendation for Immediate Action | Provides secondary containment for all chemicals used and stored. |
| Compliance Classifications | Immediate Action Required |
| Local Law | Decree No. KEP-01/BAEPEDAL/09 on the Storage of hazardous materials (1995) Appendix 5D, Art. 2.2 (b5) |
| Benchmark ID | HSE.13 |
| Benchmark Details | All necessary ventilation, plumbing, electrical, noise and lighting services shall be installed and maintained to conform to applicable laws and to prevent or minimize hazardous conditions to workers in the facility. |
| Finding Details | Because the factory does not generate and submit regular environmental impact analyses (UPL-UKL), there is no assessment for determining thermal comfort problem areas. |
| Recommendation for Immediate Action | Conduct environmental testings (noise, heat, air emission test, etc.) as part of requirement to establish environmental impact analysis (UPL-UKL) report every 6 months. |
| Compliance Classifications | Immediate Action Required |
| Local Law | Government Regulation No. 27 on Environmental Permit (2012), Article 53 |
| Benchmark ID | HSE.14.1 |

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| Benchmark Details | All production machinery, equipment and tools shall be properly guarded and regularly maintained. |
| Finding Details | 1. There is no ladder with a handrail provided in the material warehouse for workers to reach materials in high shelves. The workers use a table when they want lift up and down the materials from high shelves. 2. Not all sewing machines are equipped with needle guards and 22 sewing machines in the training room are not equipped with upper pulley guards. 3. There is no pulley guard on one of the two compressors outside of building A. 4. The factory does not implement a lockout-tagout maintenance safety system for all relevant equipment. |
| Recommendation for Immediate Action | 1. Provide a ladder with handrail in material warehouse. 2. Ensure all sewing machines are installed with needle guard and protective pulley guards. 3. Ensure all compressors have pulley guard installed. 4. Implement a lockout-tagout maintenance safety system for all relevant equipment. |
| Compliance Classifications | Immediate Action Required |
| Local Law | Regulation No. PER-01/MEN on Safety and Health in The Building Construction (1980), Article 25; Regulation No. PER-04/MEN (1985), Article 4 |
| Benchmark ID | HSE.6.1 |
| Benchmark Details | All safety and medical equipment (e.g. fire fighting equipment, first aid kits) shall be available in sufficient numbers throughout the workplace, maintained and stocked as prescribed, and easily accessible to workers. |

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| Finding Details | <p>1. There are 42 fire extinguishers at the factory but around 60% of fire extinguishers in the production buildings are low in pressure and some of them expired on August 7, 2021. 2. In the material warehouse, there is only one fire extinguishers on the ground floor and two fire extinguishers on second floor where the room length is more than 30 meters. Local regulation states that the distance between fire extinguishers should not exceed 15 meters. 3. The fire hydrant has not been installed. The factory is building an underground water tank for fire hydrant. 4. There is no fire sprinkler or thermatic installed at the factory. 5. Two first aid kits in sewing department are missing supplies such as iodine, eye rinse water, tweezer, bandage tape, alcohol, and scissor. 6. There are no eyewash or shower stations in the paint mixing room in printing department.</p> |
| Recommendation for Immediate Action | <p>1. Provides adequate fully charged fire extinguishers. 2. Ensure that fire extinguishers are less than 15 meters apart from each other. 2. Install fire hydrant. 3. Install fire sprinkler or thermatic fire extinguisher. 4. Ensure all first aid kit boxes are stocked with adequate supplies such as sterile gauze wrapped, bandage, bandage tape, cotton, triangular fabric, scissor, safety pin, disposable gloves, mask, tweezer, flashlight, eye rinse water, clean plastic bag, aquades, povidon iodine, and alcohol. 5. Install eyewash and shower station in paint mixing room in printing department.</p> |
| Compliance Classifications | Immediate Action Required |
| Local Law | <p>Regulation of the Minister of Manpower and Transmigration No. PER-04/MEN (1980), Article 4 (5) and 11; Ministerial Decree of Public Works No. 10/KPTS on Technical Security Provisions of Fire Hazard in Buildings and Environment (2000), Annex Chapter V, Article 3 (3) and Article 4 (1); Manpower Minister's Regulation No. PER- 15 /MEN/VIII/on first aid in workplace (2008), Annex II; Manpower Minister's Regulation No. PER- 15 /MEN/VIII/ on first aid in workplace (2008), Art. (8)</p> |
| Benchmark ID | HSE.4.1 |

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| Benchmark Details | Employers shall at all times be in possession of all legally required and valid permits and certificates related to health, safety, and environmental issues, such as: Purchase and storage of chemicals; Fire safety inspections; Machinery inspections; Waste disposal; Environmental licenses/permits; Sanitation permits, including those required for canteens; and Vehicle inspection and driver permits for all employer provided transportation. |
| Finding Details | 1. The factory does not have a permit to extract ground water (SIPA). 2. The factory does not have a fire action officer, fire coordinator, firefighting group or fire expert. |
| Recommendation for Immediate Action | 1. Obtain a permit to extract ground water (SIPA) from local government. 2. Assign and enroll the fire action officer, fire coordinator, firefighting group, and fire expert for government certification as per designated role in fire-fighting team. |
| Compliance Classifications | Immediate Action Required |
| Local Law | Ministerial Decree of Energy and Mining No. 1451 K/10/MEM (2000), Art. 11; Attachment III of Manpower Minister Decree 186 Year 1999 |
| Benchmark ID | HSE.1 |
| Benchmark Details | Employers shall comply with all national laws, regulations and procedures concerning health, safety, and the environment. |

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| <p>Finding Details</p> | <p>1. The factory does not conduct fire risk assessments. 2. The factory has not conducted an asbestos assessment so there is no label used for any materials containing asbestos. 3. The factory does not treat or contain the waste water generated from cleaning print screens that contain paint and solvent in the printing department. The water is disposed directly to the drain. 4. The factory was burning waste onsite during the first day of the assessment. 5. The factory has not built a hazardous waste storage room. 6. The factory's solid waste storage area is not secured with a door or fences. 7. The Health and safety committee (P2K3) does not actively conduct meetings to discuss health and safety standards in factory and they do not undergo any training. 8. The factory does not generate and submit an environmental impact analysis (UPL-UKL) every 6 (six) months. As result, environmental tests are not conducted on a regular basis. 9. Workers do no undergo a health examination. 10. The factory does not post information on room capacities in the canteen, training room, or meeting room to allow for at least 1 meter distance between individuals. 11. The maximum occupancy is not posted at the entrance of all worker common areas to limit the number of workers inside at a given time. 12. The factory does not install impermeable barriers to prevent transmission between workers in eating area. 13. There is no procedures to quarantine employees who are back from the regions that are considered at-risk for COVID-19 exposure.</p> |
| <p>Recommendation for Immediate Action</p> | <p>1. Assign a third party expert to conduct fire risk assessment. 2. Conduct an asbestos assessment and label any material in the factory containing asbestos. 3. Install a wastewater treatment plan and do not dispose waste water directly into the drain. 4. Prohibit onsite waste burning. 5. Construct a hazardous waste storage room and obtain the permit from local authority. 6. Ensure the solid waste are stored in waste storage with door and fences. 7. Conduct Health and safety committee (P2K3) meeting at least every 3 months and report the activity of P2K3 to local labor office. 8. Update environmental impact analysis (UPL-UKL) report and submit the report on a regular basis every 6 (six) months. 9. Provide annual health checkups for workers. 10. Post information on room capacities to allow for at least 1 meter distance between individuals. 11. Post the number of maximum occupancy at the entrance of all worker common areas to limit the number of workers inside at a given time. 12. Install impermeable barriers to prevent transmission between workers in eating area.</p> |

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| Compliance Classifications | Immediate Action Required |
| Local Law | Government Regulation No. 82 on Water Quality Management and Water Pollution Control (2001), Article 40; Government Regulation No. 27 on Environmental Permit (2012), Article 53; Government Regulation No. 18 on Management on Hazardous and Toxic Waste (1999), Article 40 (1), (3); Labor Minister Regulation No: PER.04/MEN/1987 on Workplace Health and Safety Committee and Appointment of Occupational Safety Expert (1987), Article 12; Safety Act No. 1 regarding health and safety working conditions (1970), Chapter III, Article 8(2) |
| Benchmark ID | HSE.28 |
| Benchmark Details | Employers shall create a system to ensure that all necessary Health and Safety protections are provided for external contractors; including protection when working within , confined spaces, maintenance issues, and general Health and Safety Issues. |
| Finding Details | The factory does not provide safety information to visitors and contractors. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | N/A |
| Benchmark ID | HSE.14.3 |
| Benchmark Details | Employers shall ensure safety instructions are either displayed or posted near all machinery or are readily accessible to the workers in language(s) spoken by workers. |
| Finding Details | Machinery operation and safety instructions are not made available in local language (Bahasa Indonesia) and only in English and Chinese. |

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| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |
| Benchmark ID | HSE.12 |
| Benchmark Details | Employers shall ensure that women are not engaged in work that constitutes a substantial risk to their reproductive health. |
| Finding Details | The factory does not have the procedures and measures to protect the reproductive health of workers through minimizing their exposure to workplace hazards. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |
| Benchmark ID | HSE.29 |
| Benchmark Details | Employers shall provide all necessary protection for workers when working at heights, confined spaces, and other high-risk areas. |
| Finding Details | 1. The confined spaces are not marked with a sign "do not enter without permit" to ensure that there is no unauthorized entry. There is no procedure established for entering confined spaces. 2 . There is no safety cage on the ladders to the two water towers of around ten meters height from ground. 3. The high work areas (such as: water tower) are not properly marked with safety precaution (such as: fall hazard sign and usage of PPE sign). |

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| Recommendation for Immediate Action | 1. Mark confined spaces with a sign "do not enter without permit or authorized person only" to ensure that there is no unauthorized entry. 2. Install safety cages to the water tower ladders. 3. Mark sign of safety precaution (such as: fall hazard sign and usage of PPE sign) in all high work areas. |
| Compliance Classifications | Immediate Action Required |
| Local Law | Regulation No. PER-01/MEN (1980), Art. II(8) |
| Benchmark ID | HSE.17.2 |
| Benchmark Details | Employers shall train workers in proper lifting techniques, and items such as lifting belts shall be provided. |
| Finding Details | The factory does not train workers on ergonomics or lifting techniques. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |
| Benchmark ID | HSE.18.1 |
| Benchmark Details | Medical facilities shall be established and maintained in factories as required by applicable laws. |
| Finding Details | 1. The factory does not have a first aid room or medical clinic onsite. 2. There is no lactating room. 3. There is no certified first aid personnel. |
| Recommendation for Immediate Action | 1. Provide a medical clinic onsite. 2. Provide lactating room. 3. Assign qualified workers to attend training to become first aid personnel. |

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| Compliance Classifications | Immediate Action Required |
| Local Law | Manpower Minister's Regulation No. PER- 15 /MEN/VIII/ on first aid in workplace (2008), Article 8 and 9; Manpower Minister's Regulation No. PER- 15 /MEN/VIII on first aid in workplace (2008), Article 2 and 3 |
| Benchmark ID | HSE.23.1 |
| Benchmark Details | Safe and clean drinking water shall be freely available at all times, within reasonable distance of the workplace. Drinking water shall be of a reasonable temperature. The means to drink water (e.g. cups) must be safe and sanitary and available in an appropriate number. |
| Finding Details | Around 50% production workers drink water using an empty mineral water bottle that is under PET code 1 which is not allowed to be refilled. |
| Recommendation for Immediate Action | Inform workers not to use plastic bottle except with PET 5 plastic material, also train the workers on how to identify plastic bottle material and the impact to human health. |
| Compliance Classifications | Immediate Action Required |
| Local Law | Kepmenperind No 705 Year 2003 Article 9 |
| Benchmark ID | HSE.5.4 |
| Benchmark Details | The emergency evacuation plan (EEP) includes procedures for notifying local community authorities in case of accidental discharge or release of chemical/waste products or any other environmental emergency. |
| Finding Details | The factory does not have an appropriate system to respond to unexpected environmental emergencies, such as chemical spills or chemical wastewater. |
| Recommendation for Immediate Action | |

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| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |
| Benchmark ID | HSE.30.2.6 |
| Benchmark Details | The health, safety, and environmental policies shall contain the framework for a comprehensive health, safety, and environmental management system including a HS&E risk assessment within which the following are clear and regularly tested and reviewed:protections to workers who allege health, safety, and environmental violations; |
| Finding Details | The factory has not confucted a health and safety risk assessment. |
| Recommendation for Immediate Action | Conduct health and safety risk assessment. |
| Compliance Classifications | Immediate Action Required |
| Local Law | |
| Benchmark ID | HSE.30.2 |
| Benchmark Details | The health, safety, and environmental policies shall contain the framework for a comprehensive health, safety, and environmental management system within which the following are clear and regularly tested and reviewed; procedures for reporting death, injury, illness and other health and safety issues (for instance, near-miss accidents) and environmental emergencies |
| Finding Details | The factory does not investigate all accidents and injuries in an attempt to identify root causes. |
| Recommendation for Immediate Action | Track and investigate all accidents and injuries in an attempt to identify root causes. |
| Compliance Classifications | Immediate Action Required |

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| Local Law | |
| Benchmark ID | HSE.7 |
| Benchmark Details | Workers shall be provided at no cost with all the appropriate and necessary personal protective equipment (e.g. gloves, eye protection, hearing protection, respiratory protection) to effectively prevent unsafe exposure (e.g. inhalation or contact with solvent vapors, noise, dust) to health and safety hazards, including medical waste. |
| Finding Details | 1. The factory does not provide PPE (such as respirator, rubber gloves and goggles) to the workers mixing the paint in printing section. They were wearing medical mask or cotton mask. 2. The factory does not provide goggles or safety glasses to workers who work in laser cutting machines. 3. There is no lifting belt provided for packing and loading workers. |
| Recommendation for Immediate Action | 1. Provides adequate PPEs such as respirator, rubber gloves, and goggles to workers in mixing paint room. 2. Provides goggles or safety glasses to workers who work in laser cutting machines. 3. Provides a lifting belt for packing and loading workers. |
| Compliance Classifications | Immediate Action Required |
| Local Law | Regulation No. PER-08/MEN/VII on Personal Protective Equipment (2010), Article 2, 3 and 6 |
| Benchmark ID | HSE.8 |
| Benchmark Details | Workers shall be provided with training on the use and maintenance of personal protective equipment. Training shall be upon hire with periodic refresher training offered to all workers. Management will ensure use of PPE as necessary. |
| Finding Details | The factory does not provide ongoing PPE training for workers. The last PPE training was conducted on March 13, 2020 is only for maintenance workers instead of for all workers. |
| Recommendation for Immediate Action | |

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| Compliance Classifications | Sustainable Improvement Required |
| Local Law | Regulation No. PER-08/MEN/VII on Personal Protective Equipment (2010), Article 7 |
| Benchmark ID | HSE.5.2 |
| Benchmark Details | Workers shall be trained in evacuation procedures. |
| Finding Details | The workers are not trained on their duties in the event of an emergency. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | Decision of Minister of Manpower No. KEP-186/MEN/1999 on Fire Prevention Units at Workplaces (1999), Art. 2 |
| Benchmark ID | HSE.16 |
| Benchmark Details | Workers shall not suffer any negative consequences for refusing to work with machinery, equipment or tools that are not properly guarded or reasonably considered unsafe. |
| Finding Details | The factory has not communicated with workers the right to refuse to perform work under unsafe conditions. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |
| Benchmark ID | HSE.14.2 |

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| Benchmark Details | Workers shall receive training in the proper use and safe operation of machinery, equipment and tools they use. |
| Finding Details | The factory does not provide safety training to workers with special/high-risk responsibilities (working with laser, electrical issues, confined space, lockout/tagout). The training conducted on March 13, 2020 was only for maintenance workers working at heights with body harness. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | Act No. 1 on Safety (1970), Art. 9(1) - (2) |
| Benchmark ID | HSE.9.2 |
| Benchmark Details | Workers shall receive training, appropriate to their job responsibilities, concerning the hazards, risks and the safe use of chemicals and other hazardous substances. |
| Finding Details | There is no evidence that workers working with chemicals are trained. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | Act No. 1 on Safety (1970), Art. 9(1) - (2) |
| Benchmark ID | HSE.17.1 |
| Benchmark Details | Workstations, including seating and standing arrangements and reach required to obtain tools, shall be designed and set-up in such a manner as to minimize bodily strains. |

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| Finding Details | The factory does not take proactive steps to reduce repetitive-motion stress or injuries, such as providing short break for exercise, adjustable chairs, and anti fatigue mats for workers working in standing position. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | Regulation of the Minister of Labour No. 7 (1964), Art. 9(1)- (2) - (3) |

Hours Of Work (HOW)

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| Benchmark ID | HOW.22.2 |
| Benchmark Details | Accurate time records shall be maintained by employers, including overtime, breaks, and leave. |
| Finding Details | Please review C.7 for details. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Immediate Action Required |
| Local Law | |
| Benchmark ID | HOW.19.1 |
| Benchmark Details | Employers can only suspend work in accordance with national laws, regulations and procedures. |
| Finding Details | Please review C.9.3 for details about work was suspended due to electricity blackout |

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| Recommendation for Immediate Action | |
| Compliance Classifications | Immediate Action Required |
| Local Law | |
| Benchmark ID | HOW.22.1 |
| Benchmark Details | Employers shall have in place policies for managing all working hour, overtime, and leave records in normal and exceptional circumstances. |
| Finding Details | The factory does not have procedures on hours of work, including during exceptional circumstances. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | N/A |
| Benchmark ID | HOW.5 |
| Benchmark Details | Employers shall maintain necessary records identifying all women workers and all workers under the age of 18 entitled to legal protection concerning work hours. |
| Finding Details | The factory does not have a system in place to identify pregnant women or nursing women in working hour records. |
| Recommendation for Immediate Action | Establish a system to identify pregnant women or nursing women in work hour records. |
| Compliance Classifications | Immediate Action Required |
| Local Law | N/A |

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| Benchmark ID | HOW.22.4 |
| Benchmark Details | Employers shall not maintain multiple time-keeping systems and/or records. |
| Finding Details | Please review C.7 for details |
| Recommendation for Immediate Action | |
| Compliance Classifications | Immediate Action Required |
| Local Law | |
| Benchmark ID | HOW.11.1 |
| Benchmark Details | Employers shall provide workers with paid annual leave as required under national laws, regulations and procedures. |
| Finding Details | The factory does not provide any annual leave or menstruation leave. |
| Recommendation for Immediate Action | Provides all legally required leave including annual leave and menstruation leave. |
| Compliance Classifications | Immediate Action Required |
| Local Law | Law No. 13 on Manpower (2003), Article 79(2c) - (2d) - (3); Law No. 13 on Manpower (2003), Art. 81 |
| Benchmark ID | HOW.9.2 |
| Benchmark Details | Employers shall take reasonable steps to inform workers about the nature and expected duration of the circumstances sufficiently in advance to allow workers to make alternative plans. |

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| Finding Details | 1. The factory does not notify workers at the beginning of their working shift before the requested overtime. The factory prepares the overtime approval form at around 3:00pm or 60-90 minutes before the end of the shift. 2. The factory does not take reasonable steps to inform workers of the nature and potential duration of the circumstances such when electricity blackout happen. |
| Recommendation for Immediate Action | 1. Notify workers at the beginning of their working shift before the workers are requested to work overtime. |
| Compliance Classifications | Immediate Action Required |
| Local Law | Law No. 13 on Manpower (2003), Art 78(1a) |
| Benchmark ID | HOW.22.5 |
| Benchmark Details | Time records maintained shall be authentic and accurate. |
| Finding Details | Please review C.7 for details |
| Recommendation for Immediate Action | |
| Compliance Classifications | Immediate Action Required |
| Local Law | |
| Nondiscrimination (ND) | |
| Benchmark ID | ND.8.1 |

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| Benchmark Details | Employers shall abide by all protective provisions in national laws and regulations benefitting pregnant workers and new mothers, including provisions concerning maternity leave and other benefits; prohibitions regarding night work, temporary reassignments away from work stations and work environments that may pose a risk to the health of pregnant women and their unborn children or new mothers and their new born children, temporary adjustment of working hours during and after pregnancy, and the provision of breast-feeding breaks and facilities. |
| Finding Details | There is no breast-feeding or lactating room available. Please review HSE.18.1 for details |
| Recommendation for Immediate Action | |
| Compliance Classifications | Immediate Action Required |
| Local Law | |
| Benchmark ID | ND.12 |
| Benchmark Details | Employers shall take measures to reasonably accommodate workers with (chronic) illnesses, including HIV/AIDS-related illnesses, which could include rearrangement of working time, the provision of special equipment, opportunities for rest breaks, time-off for medical appointments, flexible sick leave, part-time work and return-to-work arrangements. |
| Finding Details | The factory does not take measures to accommodate workers with chronic illnesses. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | N/A |

