

Fair Labor Association: Independent External Factory Assessment

Assessment Date :

27 Sep 2021



Factory Information

FLA Affiliates	Pou Chen Corporation
Country	Indonesia
Number of Workers	8756

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

Compensation (C)	3
Employment Relationship (ER)	15
Freedom Of Association And Collective Bargaining (FOA)	2
Harassment Or Abuse (H/A)	2
Health, Safety And Environment (HSE)	10
Hours Of Work (HOW)	2
Nondiscrimination (ND)	3

Assessment Information

Assessor	Donny Triwandhani
Assessment Date	27 Sep 2021
Assessment Purpose	Factory Assessment (In-Person)

ASSESSMENT RESULTS

Compensation (C)

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.1.1 for details
Recommendation for Immediate Action	Maintain accurate severance payment records and ensure complete severance payment records available for review.
Compliance Classifications	Immediate Action Required
Local Law	Labor Law No. 13 (2003), Art. 156 (3a)
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.
Finding Details	Worked hours are not paid when workers go home early, with approval from factory superiors, for personal reasons before they have worked for a half day. The workers are considered absent without pay.
Recommendation for Immediate Action	Pay workers for all hours worked.
Compliance Classifications	Immediate Action Required

Local Law	Government Regulation No.78 Year 2015 Concerning Manpower Wage Article 20
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	There was mass termination in factory A on October 2020. Pay slips for last wage including severance payment of terminated workers in Factory A were provided for review. However, payment for unused annual leave was not consistent with the number of balance of annual leave. For instance: the pay slip showed worker (No AB27263) still has 12 days annual leave and never been taken, but no payment for unused annual leave reflected in his pay slip. According ERC Head, there were separate payment records with detail breakdown of payment and actual annual leave balance, and this worker actually did not have annual leave left. The separate payment records with detail of breakdown payment and actual annual leave balance were not provided for review during last day of assessment. As result, assessors were unable to fully verify the compensation of terminated workers in Factory A.
Recommendation for Immediate Action	Maintain accurate severance payment records. Pay workers' unused annual leave correctly. Ensure complete severance payment records are available for review.
Compliance Classifications	Immediate Action Required
Local Law	Labor Law No. 13 (2003), Art. 156 (3a)

Employment Relationship (ER)

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.

Finding Details	The ongoing training to workers does not include recruitment, hiring, termination & retrenchment, and industrial relations. Moreover, only around 25% of total workers have received refresher training, not all workers.
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	Please review ER.18.1.1 for details
Recommendation for Immediate Action	
Compliance Classifications	Immediate Action 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.

Finding Details	According to the HR Manager, the facility has not established the program to hire disabled workers. There are 66 disabled workers at the factory, which does not fully comply with the local law that requires the factory to hire one person with disability per 100 workers. For a factory of 9151 total employees, the factory must employ at least 91 workers with disabilities.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	Law No. 4 of 1997 concerning persons with disabilities Article 14; Law No.8 Year 2016 About Persons with Disabilities on Article 53
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 specific training to relevant supervisors that includes all of FLA's code elements and employment functions. The factory provides training on time recording related to production, wage calculation & benefit, overtime hours, harassment & abuse but only to staff who will be promoted to a higher position.
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.
Finding Details	There are several grievance mechanism options are available at factory such as "heart to heart" meeting with management, through union, SMS /WhatsApp and bipartite committee. However, the only confidential grievance channel available for workers is through the WOVO app because the factory got rid of the grievance/suggestion box in 2018. Not all workers have a smartphone or access to the WOVO app. As a result, the confidential grievance channel is not accessible for all workers to use.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
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 retrenchment and termination processes.
Finding Details	1. The factory has policies on nondiscrimination, forced labor, and child labor but there are no procedures. 2. The factory does not have procedures to remediate issues where child labor is found.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required

Local Law	
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 policies and procedures on performance reviews do not include guarantees of nondiscrimination and the option for written feedback. 2. The factory provides performance review for all workers and the workers have access to their evaluations, but they do not have the right to provide feedback on or disagreement with the result. In addition, the factory does not clearly explain why probation workers fail the performance review.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
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.
Finding Details	The orientation training for new workers does not include recruitment, hiring & personnel development, termination & retrenchment.
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	The worker involvement component is missing across all employment functions. 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.
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.
Finding Details	The records of disciplinary actions are maintained in a separate folder instead of in workers' personnel files.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	

Benchmark ID	ER.18.1.1
Benchmark Details	The disciplinary system shall be applied in a fair and nondiscriminatory manner and include a management review of the actions by someone senior to the manager who imposed the disciplinary action.
Finding Details	<p>1. Disciplinary action system, handling harassment & abuse cases and training effectiveness are not fully in line with FLA Code and Benchmarks for below cases: - The union received a grievance from a local supervisor on May 3, 2021 for the case of an expatriate manager yelling at and threatening to demote the supervisor due to a work related issue. Based on investigation report from the H/A team, there was no evidence of verbal abuse because yelling is not always considered verbal abuse. However, the factory's H&A handling procedures on point 4.4.1 states that angry, rough, immediate yelling, and unnecessary out loud speaking too close are to be considered verbal abuses. - Article 24 of the CBA (valid from May 2019 to May 2021, being extended for 3 months) regarding disciplinary action states in point 4e there should be a warning if there is verbal abuse related to something outside of the job. While, the common case of verbal abuse happens due to the issue/problem related to the job. As a result, the disciplinary action system is ineffective. - Based on training on Harassment & Abuse for expatriate on September 19, 2020, the verbal abuse examples that are translated into local language of expatriate (Mandarin) is not fully explained in the "Don't do it" section. These examples include speaking harshly, cursing, insulting workers but yelling and screaming are not included.</p> <p>2. There is no training or communication to managers and supervisors to ensure they are familiar with the workplace disciplinary system and in applying appropriate disciplinary practices. Several disciplinary actions are not fairly applied. For instance: - A supervisor proposed disciplinary action against union representatives due to them leaving the workplace to attend a new CBA negotiation meeting. - An office staff was given 1st warning letter on February 4, 2021 due to not reporting her four months of pregnancy. The CBA requires employees to do this. However, this staff explained she was not aware that she was pregnant. The HR department did not accept her appeal and they did not conduct a further investigation of the worker's explanation.</p>

Recommendation for Immediate Action	1. Inform managers and supervisors that they should not use any form of harassment or abuse to maintain labor discipline. 2. Ensure managers and supervisors are fully familiar with the workplace disciplinary system and in applying appropriate disciplinary practices.
Compliance Classifications	Immediate Action Required
Local Law	Constitution of Indonesia (1945), Art. 28G
Benchmark ID	ER.18.4
Benchmark Details	The disciplinary system shall include a third party witness during imposition, and an appeal process.
Finding Details	The procedures on disciplinary action does not include workers' ability to have a third party witness during the imposition of disciplinary actions.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	N/A
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	The factory does not have a written commitment to non-retaliation from management in the disciplinary process including if a worker requests a witness or filing an appeal of disciplinary action.
Recommendation for Immediate Action	

Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER.18.3.3
Benchmark Details	Workers must sign all written records of disciplinary action against them.
Finding Details	Worker representatives do not agree and sign written disciplinary actions against them. Please review FOA.8.1 for details
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	During orientation, the factory provides a copy of the CBA to new workers. However, the factory does not provide any other written documentation that substantiates all the issues covered in orientation.
Recommendation for Immediate Action	Provide written documentation that substantiates all the issues covered in orientation provided to new workers.
Compliance Classifications	Immediate Action Required
Local Law	

Freedom Of Association And Collective Bargaining (FOA)

Benchmark ID	FOA.8.1
Benchmark Details	Employers shall not (threaten to) shift production or close a workplace site in an attempt to prevent the formation of a union, in reaction to the formation of a union, in reaction to any other legitimate exercise of the right to freedom of association and collective bargaining, including the right to strike, or in an effort to break up a union.
Finding Details	There were meetings between management and worker/union representatives for negotiation of new CBA on June 9, 2021, June 16, 2021, June 25, 2021, June 28, 2021, June 30, 2021 and September 17, 2021, but the negotiation for new CBA has not been completed. The SPSI union leader issued a letter of assignment on May 20, 2021 for nine SPSI union representatives as an advocacy team for new CBA negotiation, which is in line with CBA Article 6 point 3 (a&b) and Article 8 point 4. However, the factory issued warning letters to two out of these nine SPSI union representatives for leaving the workplace on June 25, 2021, June 28, 2021, and June 30, 2021. The warning letters have been escalated since the two SPSI union representatives do not want accept the warning letter. After mediation with management, one SPSI union that happen to be a chief of PPIC department has returned to normal work and his warning letters have been revoked. While, another SPSI union representative received the last warning letter and was suspended from work for 5 days until September 30, 2021. This worker is still doing union activity and has yet to return to work. The case for this union representative is pending for resolution and creating the risk for factory not complying with FLA Code, FOA protocol, and National Law.
Recommendation for Immediate Action	Do not impose any sanction on workers for organizing or participating in collective bargaining negotiations.
Compliance Classifications	Immediate Action Required
Local Law	Act No. 21 on Union (2000), Art. 28
Benchmark ID	FOA.20.2

Benchmark Details	Provisions in collective bargaining agreements that contradict national laws, rules and procedures or offer less protection to workers than provisions of the FLA Workplace Code shall also be considered not applicable.
Finding Details	Article 24, Point 4e of the CBA regarding disciplinary action does not offer enough protection to workers for harassment and abuse cases conducted by superior. Please review ER.18.1.1 for details
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	Law No. 13 on Manpower (2003), Art. 124 (3)

Harassment Or Abuse (H/A)

Benchmark ID	H/A.11
Benchmark Details	Employers shall have a system to discipline supervisors, managers or workers who engage in any physical, sexual, psychological or verbal violence, harassment or abuse, through measures such as compulsory counseling, warnings, demotions, and terminations or a combination thereof regardless of whether such action was intended as a means to maintain labor discipline with a view to preventing the reoccurrence of violence and harassment, and facilitating their reintegration into work, where appropriate.
Finding Details	Please review ER.18.1.1 for details
Recommendation for Immediate Action	
Compliance Classifications	Immediate Action Required
Local Law	Constitution of Indonesia (1945), Art. 28G

Benchmark ID	H/A.5
Benchmark Details	Employers shall not use any form of verbal violence, including screaming, yelling, or the use of threatening, demeaning, or insulting language, as a means to maintain labor discipline.
Finding Details	Please review ER.18.1.1 for details of verbal abuse conducted by manager to supervisor.
Recommendation for Immediate Action	
Compliance Classifications	Immediate Action Required
Local Law	Constitution of Indonesia (1945), Art. 28G

Health, Safety And Environment (HSE)

Benchmark ID	HSE.5.3
Benchmark Details	Alarm systems shall be regularly tested and evacuation drills shall be undertaken at least annually.
Finding Details	Due to the pandemic situation, the last evacuation drill conducted in the factory was on December 31, 2019 for all workers. The factory did not conduct any evacuation drills in 2020 or 2021. In 2021, the factory only conducted emergency preparedness and fire simulation training to the workers without conducting a real evacuation drill.
Recommendation for Immediate Action	Ensure that all workers are included in evacuation drill annually. The drills can be done batch by batch in each building if situation is not allowed during Covid-19 pandemic.
Compliance Classifications	Immediate Action Required
Local Law	Regulation of the Minister of Public Work No. 26 on Technical Requirements of Fire Protection System on Building Constructions and Surroundings (2008), Art. 8.6.2

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	Evacuation maps are posted with the wrong orientation in the Canteen, Clinic, Chemical Warehouse, and Finished Good Warehouse of B Building.
Recommendation for Immediate Action	Ensure that all evacuation maps are posted with correct orientation.
Compliance Classifications	Immediate Action Required
Local Law	Government Regulation No. 36 on Building (2005), Art. 59
Benchmark ID	HSE.5.1.2
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	The visual fire alarm cannot be seen from far away because it is not positioned high enough. The visual fire alarm is working as a light indicator on the fire alarm button in auto cutting production.
Recommendation for Immediate Action	Position the visual fire alarm high enough so that it can be seen and heard from far away.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	HSE.19

Benchmark Details	All facilities including workplace buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with all applicable laws, including relevant sanitation, medical, and safety and health regulations.
Finding Details	Not all toilets, specifically the toilet between production building A and B, are provided with drying facilities.
Recommendation for Immediate Action	Provide drying facilities to all toilets.
Compliance Classifications	Immediate Action Required
Local Law	
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	1. One electric button in the Bottom Warehouse was not properly fixed. Moreover, the wire was showing. 2. There is no rubber mat provided for the main control panels in the factory (specifically on Bottom Production). 3. At least four cables in the Material Warehouse are repaired or connected with electrical tapes, which should only be used as a temporary fix.
Recommendation for Immediate Action	1. All electrical buttons must be properly fixed and the wires must be enclosed. 2. Provide rubber mats for all main control panels in the factory. 3. Do not use electrical tape for permanent fixture of cable splices or connections.
Compliance Classifications	Immediate Action Required
Local Law	Labor Minister Decree No. KEP-75/MEN (2002), Art. 2; Government Regulation No. 36 on Building (2005), Art. 36
Benchmark ID	HSE.14.1

Benchmark Details	All production machinery, equipment and tools shall be properly guarded and regularly maintained.
Finding Details	One sewing machine in sewing section of Building A did not have a full pulley guard.
Recommendation for Immediate Action	Ensure all sewing machines are equipped with full pulley guards.
Compliance Classifications	Immediate Action Required
Local Law	Regulation No. PER-04/MEN (1985), Art. 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.
Finding Details	One fire extinguisher has low pressure in RMCC (Recycle Material Control Centre) of Factory B.
Recommendation for Immediate Action	Ensure that all fire extinguishers have the proper pressure and are ready for use at any time.
Compliance Classifications	Immediate Action Required
Local Law	Regulation of the Minister of Manpower and Transmigration No. PER-04/MEN (1980), Art. 11
Benchmark ID	HSE.1
Benchmark Details	Employers shall comply with all national laws, regulations and procedures concerning health, safety, and the environment.

Finding Details	1. One major crack (around 10mm) was found in the second floor of the Material Warehouse building. The crack's length was from the 2nd floor until the 1st floor of the Material Warehouse building and it's a see-through crack. As per document provided by the management, The crack was found on June 24, 2021 by the factory engineering. On July 1, 2021, a consultant confirmed the crack was caused by an earthquake. 2. Moreover, more than three holes were found on the wall of the RMCC (Recycle Material Control Centre) of Factory B.
Recommendation for Immediate Action	1. Repair the crack so that the wall will not be separated or collapse from the building structure. 2. Repair the holes in the wall of the RMCC.
Compliance Classifications	Immediate Action Required
Local Law	Government Regulation No. 36 on Building (2005), Art. 33
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 5% of the workers use disposable plastic bottle to refill potable water provided by factory. The plastic material of this bottle is PET 1 (one-time usage - disposable) instead of PP 05 (refill).
Recommendation for Immediate Action	Inform workers not to use plastic bottles except with PP 05 plastic material.
Compliance Classifications	Immediate Action Required
Local Law	Permerindag No. 705 Year 2003 Requirements of Technical Industrial Packaged Drinking Water Article 9.1.c and. Article 9.3.; Attachment of Permenkes No 40 Year 2017 Section C Point 1.b.1.
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	The chemical mask provided at the chemical warehouse is not stored in a sealed container to prevent filter deterioration.
Recommendation for Immediate Action	Store chemical mask in a sealed container.
Compliance Classifications	Immediate Action Required
Local Law	Manpower Minister Instruction INS. 11/M/BW/1997, point I.3.; Regulation No. PER-08/MEN/VII on Personal Protective Equipment (2010), Art. 7

Hours Of Work (HOW)

Benchmark ID	HOW.1.1
Benchmark Details	Employers shall comply with all national laws, regulations and procedures concerning hours of work, public holidays and leave.
Finding Details	The factory requires workers to sign a weekly overtime request form (Surat Permohonan lembur mingguan) on Thursday for overtime to be conducted the following week (Monday to Friday /Saturday). After weekly overtime has been conducted, the workers need to sign the overtime weekly report form (laporan lembur mingguan) on the following Tuesday. This practice of requiring workers to sign an overtime form the week runs the risk of involuntary overtime. There is no evidence that workers can decline overtime or can change their mind after signing up for overtime.
Recommendation for Immediate Action	Ensure that workers sign the overtime request form the same day that overtime work is conducted.

Compliance Classifications	Immediate Action Required
Local Law	
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 working hour records do not identify pregnant or lactating workers to help ensure they receive their entitled legal protections concerning working hours.
Recommendation for Immediate Action	Identify pregnant or lactating workers in their work hour records to help ensure they receive their entitled legal protections concerning working hours.
Compliance Classifications	Immediate Action Required
Local Law	

Nondiscrimination (ND)

Benchmark ID	ND.4
Benchmark Details	Employers may not request the disclosure of any personal, non-job related information during the application, recruitment, or hiring process, including but not limited to gender, race, religion, disability, sexual orientation, nationality, political opinion, social group, ethnic origin, or marital status.
Finding Details	Please review ND.3 for details
Recommendation for Immediate Action	Ensure recruitment including job advertisements, job descriptions, questionnaire and job performance/evaluation are free from any type of discriminatory bias.

Compliance Classifications	Immediate Action Required
Local Law	Law No. 13 on Manpower (2003), Art. 5
Benchmark ID	FOA.4.1
Benchmark Details	Employers shall not use any form of physical or psychological violence, threats, intimidation, retaliation, harassment or abuse against union representatives and workers seeking to form or join an organization of their own choosing.
Finding Details	Please review FOA.8.1 for details
Recommendation for Immediate Action	
Compliance Classifications	Immediate Action Required
Local Law	Act No. 21 on Union (2000), Art. 28
Benchmark ID	ND.3
Benchmark Details	Recruitment and employment policies and practices, including job advertisements, job descriptions, application and interview questions and job performance/evaluation policies and practices shall be free from any type of discriminatory bias.
Finding Details	1. The job applications asks for information on an applicant's religion and marital status. 2. The recruitment policy and job application do not state a minimum hiring age. The factory has procedures for young and juvenile workers, but there are no young or juvenile workers hired.
Recommendation for Immediate Action	1. Ensure job advertisements, job descriptions, questionnaire, and job performance/evaluation are free from any type of discriminatory bias. 2. Reflect the minimum hiring age in recruitment policy and google form to avoid children and juvenile applicants if the factory does not intend to hire them.

Compliance Classifications	Immediate Action Required
Local Law	Law No. 13 on Manpower (2003), Art. 5

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