

# Fair Labor Association: Independent External Factory Assessment

Assessment Date :

**16 Nov 2021**



## Factory Information

FLA Affiliates	Commemorative Brands Inc.
Country	United States of America
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

Employment Relationship (ER)	2
Health, Safety And Environment (HSE)	2

## Assessment Information

Assessor	Rodriguez Compliance Group
Assessment Date	16 Nov 2021
Assessment Purpose	Factory Assessment (Virtual Compliance Check)

## ASSESSMENT RESULTS

### Employment Relationship (ER)

Benchmark ID	ER.14.1
Benchmark Details	Employers shall use standard contract language with employment agencies or intermediaries that specifically imparts power to employers to directly pay wages to migrant/ contract/ contingent/ temporary workers and ensures equality of compensation and workplace standards as set under the FLA Workplace Code and national laws and regulations.
Finding Details	At the time of the audit, the factory did not identify temporary workers.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	The company management could invoke temporary labor agency meet the contractual agreement, or invoice the Fair Labor Standards Act (FLSA) regarding payments of wages.
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	Through worker interviews conducted, identified a low awareness by workers of the existence of the third-party grievance system (Lighthouse). The site management has not conducted an annual refresher on this mechanism. In addition, the facility has not conducted face or in-person training at the facility due to the social distance guidelines implemented due to Covid-19 pandemic guidelines.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	NA

### 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	REFER to HSE5.1.5 Due to the Covid-19 pandemic, the facility has not conducted physical fire drills since Oct 16, 2019. Management did not provide examples of communication or meetings conducted to verbally instruct employees on the fire drill process. However, the local fire department conducted a review of the facility on August 4, 2021.
Recommendation for Immediate Action	During the period of the Covid-19 pandemic, the company should provide periodic communication of the fire drill evacuation process, whether written communication, or conduct departmental meetings and practice social distance guidelines. The Site management should explore the possibility to conduct actual drills by smaller group of workers, such as by department or area of work.
Compliance Classifications	Immediate Action Required
Local Law	NA no regulation at federal or state level.

Benchmark ID	HSE.5.1.5
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	Due to the Covid-19 pandemic, the facility has not conducted physical fire drills since Oct 16, 2019. Management did not provide examples of communication or meetings conducted to verbally instruct employees on the fire drill process. However, the local fire department conducted a review of the facility on August 4, 2021.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	

