

# Fair Labor Association: Independent External Factory Assessment

Assessment Date :

**22 Aug 2022**



## Factory Information

FLA Affiliates	Pou Chen Corporation
Country	Vietnam
Number of Workers	4376

## 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)	1
Employment Relationship (ER)	8
Freedom Of Association And Collective Bargaining (FOA)	1
Health, Safety And Environment (HSE)	14
Hours Of Work (HOW)	1
Nondiscrimination (ND)	2

## Assessment Information

Assessor	Openview - Vietnam
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Assessment Date	22 Aug 2022
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Assessment Purpose	Factory Assessment (In-Person)
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## ASSESSMENT RESULTS

### Compensation (C)

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	<p>(1) Workers at the factory who perform hazardous job tasks are entitled to a bonus. When factory management re-assigns a worker away from a hazardous position, the worker's pay is immediately adjusted to remove this bonus. Local law, however, requires the employer to maintain the bonus for 30 days after the re-assignment. For example, a sampled worker was transferred from a sewing position to a drawing position on April 18, 2022. The factory removed the hazardous work bonus from this worker's pay on the next paycheck, rather than waiting 30 days to do so. (2) The factory was closed from July 19, 2021 to October 11, 2021 due to the COVID-19 pandemic. From July 19 until August 31, the factory paid its workers minimum wage (VND 3,920,000/month). From September 1 until October 11, the factory paid 50% of minimum wage for the downtime and full contract salary for the holidays. One sampled worker, however, did not receive proper payment during this period. This worker took sick leave from July 1 through August 20. As of July 1, this worker had only accrued three days of sick leave. Therefore, the factory paid the worker for three sick days (July 1 - July 3) and did not pay the worker at all for July 4 - August 20. Since the factory was closed during the period July 4 - August 20, however, the factory should have paid this worker the same minimum wage being paid to all other workers during this downtime period.</p>
Recommendation for Immediate Action	<p>(1) Continue to pay workers who are re-assigned away from hazardous work the hazardous work bonus for 30 days after the date of re-assignment. (2) Pay all workers the full amount owed for the 2021 stoppage time.</p>

Compliance Classifications	Immediate Action Required
Local Law	1. Law No.45/2019/QH14, Article 29 2. Law No.45/2019/QH14, Article 90

## 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 factory provides ongoing training for workers, but this training does not include content on Hiring & Recruitment; Personnel Development, Review, & Promotion/Demotion; or Retrenchment.
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	The factory collects worker grievances through a suggestion/complaint box, but the procedure in place to handle these grievances is insufficient. The suggestion boxes are opened and checked by only one member of management, rather than having at least two parties present to attest. Factory management does not keep records of when suggestion boxes are checked.
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) At the end of the probationary period, factory management evaluates new workers along criteria including compliance with factory rules, job compliance, attitude, and communication skill. Managers have no guidance or measurable standards for applying these criteria. The results of this evaluation depend solely upon the decision of line supervisors/line managers. (2) The factory has not developed a procedure to handle cases of discrimination at the factory (if any), including steps to discipline those responsible for violating the non-discrimination policy. (3) The factory has not developed a procedure to handle cases of forced labor found in the factory (if any), including the steps to discipline those responsible for violating the factory's prohibition of forced labor . (4) The factory has not developed a policy or procedure on retrenchment.
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.
Finding Details	The factory has not developed written policies and procedures on personnel development to 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	
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	The factory has not developed policies and procedures on performance reviews that include steps and processes for reviews, linkages to job grading, nondiscrimination, written feedback, and compliance with the legal requirements. The factory has issued internal communication letters to communicate the scoring method used to determine skill bonuses for some positions such as cutting, sewing, and punching.

Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER.8
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 is no procedure or guidance in place to ensure that all workers have the same opportunities to be evaluated for promotion. The factory selects workers for promotion solely based on the suggestion/comments of the line supervisors and managers.
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 factory has not developed a process for regular, comprehensive review of its established policies and procedures relevant to FLA Code elements and Employment Functions. There are no records in place that indicate that the factory has conducted a comprehensive review. In most cases, only the staff directly involved in these policies review them.



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	If a worker misses the factory-provided annual occupational health check due to taking marriage or funeral leave, the factory provides the worker with a make-up opportunity. If a worker misses the check due to annual leave or personal leave, the worker must arrange for their own occupational health check and provide records within one month, or they face discipline. This distinction does not align with local law, which requires employers to provide opportunities for occupational health checks on an equal basis for all employees.
Recommendation for Immediate Action	Provide occupational health checks for all employees on an equal basis.
Compliance Classifications	Immediate Action Required
Local Law	Law No.45/2019/QH14, Article 122
<b>Freedom Of Association And Collective Bargaining (FOA)</b>	
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	FLA Comment: Vietnam has not ratified ILO Convention 87. Under Vietnamese law, all unions are required to affiliate with a single trade union, the Vietnam General Confederation of Labor (VGCL), which is affiliated with the Communist Party. With respect to such union monopolies, the ILO Committee on Freedom of Association has stated that “the rights of workers to establish organizations of their own choosing implies... the effective possibility of forming... [trade unions] independent both of those which exist already and of any political party.” Vietnam’s legal framework is therefore not compatible with the ILO Principles on Freedom of Association and, as such, all factories in Vietnam fail to comply with the FLA Code standard on Freedom of Association.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	

## Health, Safety And Environment (HSE)

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	The factory motorbike parking lot (a built structure with a roof, surrounding fence, and four escape exits) lacks posted evacuation maps, which are required by local law.
Recommendation for Immediate Action	Post evacuation maps in the motorbike parking lot.
Compliance Classifications	Immediate Action Required
Local Law	Decree No. 136/2020/NĐ-CP, Article 5; Circular No. 149/2020/TT-BCA, Article 5.
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	One out of two fire alarm control panels at the central fire safety area was not working during the assessment.
Recommendation for Immediate Action	Keep all fire alarm control panels operational. Immediately repair any damages.
Compliance Classifications	Immediate Action Required
Local Law	TCVN 5738:2001, Clause 8.2; TCVN 3890:2009, Clause 6.1.3
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. The factory's working environment inspection report dated November 24-25, 2021 indicates that at three locations (grinding areas No.s 2552, 0678, and 1932) noise levels reach up to 91dBA, which exceeds limits set under local law. Records indicate that the factory has provided in-kind benefits for workers in these areas as a short-term compensation for the hazardous working condition. 2. The factory has no heat stress management procedure and has not conducted a heat stress assessment for potential areas of concern such as the wastewater treatment plant, air compressor areas, maintenance workshop, cooking area, cartons storage areas, and outsole drying chambers.
Recommendation for Immediate Action	1. Ensure that noise levels in the workplace are in line with local law.
Compliance Classifications	Immediate Action Required
Local Law	1. Circular No. 24/2016/TT-BYT 2. Circular No. 07/2016/TT-BLDTBXH, Art. 3; Circular No. 07/2016/TT-BLDTBXH, Art. 3
Benchmark ID	HSE.14.1
Benchmark Details	All production machinery, equipment and tools shall be properly guarded and regularly maintained.
Finding Details	1. There are no convex mirrors at road intersections within the factory premises to help avoid collisions. There are no markings for vehicle traffic lanes and pedestrian walk paths in the factory compound. There are no warning signs or floor markings to designate forklift paths at the materials warehouse and finished goods warehouse. 2. The factory has established a LOTO (Lockout and Tagout) program for equipment and machines. However, the factory uses an improper lock (an ordinary padlock and chains) for the lockout system. Furthermore, there is no lockout at all for the air valve, the high-pressure water valve in the air compression system, or the high-pressure water pipe.

Recommendation for Immediate Action	1. Install convex mirrors at road intersections. Provide visible markings for traffic lanes and walk paths. Post forklift warning signs and clearly mark forklift routes at the materials warehouse and finished goods warehouse. 2. Implement LOTO procedures and tools wherever necessary, including the air valve, high-pressure water valve, and high-pressure water pipe. Use proper LOTO devices in all cases.
Compliance Classifications	Immediate Action Required
Local Law	1. Law No. 84/2015/QH13, Art. 16 2. Decision 959/QD-EVN, Art. 9; Law No. 84/2015/QH13, Art. 16
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	1. Factory staff conduct a monthly inspection of the fire safety system. However, the factory did not produce evidence (such as a contract or inspection records) that it also engages with a competent third party to inspect the fire safety system (sprinklers, fire hoses, fire pumps system, etc.), as required by law. 2. The factory does not have an emergency shower at the cement mixing rooms or the ink mixing room. The eyewash station is not within 10 meters of the cementing lines (where workers handle chemicals requiring eyewash) as required by local law. In addition, there is no emergency shower and no eyewash station at the battery charging station in the finished goods warehouse, where liquid acid is in use.
Recommendation for Immediate Action	1. Engage with a competent third party for inspections of the fire safety system. Maintain all related records. 2. Install an emergency shower and safety eyewash within 10 meters of areas where chemicals are used, as required by law.
Compliance Classifications	Immediate Action Required

Local Law	1. TCVN 3890:2009, Clause 6.2.3, Clause 7.2.2, Clause 8.3.5; QCVN 02:2020/BCA, Clause 5.1 2. Law No. 06/2007/QH12, Art. 29, Art. 37; QCVN 05:2020/BCT, Clause 5.9, Clause 7.2
Benchmark ID	HSE.18.2.1
Benchmark Details	An appropriate number of medical staff shall be on duty during all working hours, including any type of overtime, as required under national law.
Finding Details	The factory's medical facility is not in operation during the factory's third shift (22:00 – 6:00). The factory has not yet engaged with the nearby hospital to provide healthcare services during the third shift, as required by law.
Recommendation for Immediate Action	Arrange for workers on the factory's third shift to have access to healthcare during their shift.
Compliance Classifications	Immediate Action Required
Local Law	Decree No. 39/2016/ND-CP, Article 37
Benchmark ID	HSE.4.1
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	The factory did not have records or certificates on file to indicate that the cold storage area in the factory's kitchen has received safety inspections, nor did the factory have any technical files on the cold storage apparatus.
Recommendation for Immediate Action	Conduct periodic safety inspections on the cold storage area and maintain documentation on file.

Compliance Classifications	Sustainable Improvement Required
Local Law	Circular No. 36/2019/TT-BLDTBXH; TCVN 6739:2015
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. The factory does not have any plans for phasing out controlled ozone-depleting substances) such as HCFC-22 (Hydrochlorofluorocarbons 22), which is used in the factory's cooling processes. 2. The factory does not have a procedure to manage exposure to ACM (asbestos contaminated materials), nor does it take proper steps to ensure that workers are not exposed to asbestos. 3. The factory has not conducted an assessment to inspect possible asbestos sources (e.g., insulation materials, construction materials). The factory does not have test results on file to indicate compliance with local laws and FLA Code requirements on asbestos in the factory.
Recommendation for Immediate Action	1. Track all ODS emission sources and establish a phase-out plan for all controlled ODS. 2. Establish an ACM management procedure; take proper steps to ensure that workers are not exposed to asbestos. 3. Conduct an assessment to identify materials suspected of containing asbestos. 4. Review and update all policies and procedures relevant to environmental protections and occupational safety. 5. Provide training and communication to all workers and responsible persons on the newly updated policies and procedures. 6. Regularly check and maintain all records relevant to environmental protection and occupational safety. 7. Conduct regular internal audits to review implementation and make continuous improvement.
Compliance Classifications	Immediate Action Required
Local Law	1. Decree No. 06/2022/NĐ-CP, Article 22(2d) 2. Circular No. 07/2016/TT-BLDTBXH, Art. 3 3. Circular No. 07/2016/TT-BLDTBXH, Art. 3

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	There are no safe operating procedures, warning signs, or "authorized access only" signs for the cold storage (3-5 degree Celsius) in the factory's kitchen.
Recommendation for Immediate Action	Post warning signs, "authorized access only" signs, and safe operation procedure signs for the cold storage area.
Compliance Classifications	Immediate Action Required
Local Law	Law No. 84/2015/QH13, Art. 16
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	<p>1. The factory has not conducted an ultraviolet (UV) radiation measurement in the UV treatment areas of Workshops C and D. The assessment cannot determine, therefore, whether the workers performing UV treatment are exposed to more than three rem/year. The factory does not provide suitable PPE such as UV glasses, gloves, or blouse/apron to protect the UV treatment workers in Workshop D. 2. There is no danger sign, no "authorized access only" sign, and no lock to prevent unauthorized entry to confined spaces in the sewers or in the electrical trenches at the generator house. 3. The factory has not conducted a risk assessment for confined space hazards. The factory does not have a safe operating procedure in place for working in confined spaces. This procedure should consist of ensuring a safe atmosphere, keeping rescue equipment ready, and having a trained observer present. 4. The factory has not posted a fall hazard warning sign or an "authorized access only" sign for high platforms such as rolling ladders and portable ladders at the loading area, materials warehouse, and finished goods warehouse.</p>



Recommendation for Immediate Action	1. Conduct UV radiation measurements at the UV treatment areas to ensure the workers are not exposed to more than three rem per year. Provide suitable PPE to workers working with radiation, communicate its importance to workers, and supervise its use. 2. Post warning signs and install locks at confined spaces. 3. Establish a safe working plan for confined spaces. 4. Post warning signs for high platforms with fall risks.
Compliance Classifications	Immediate Action Required
Local Law	1. QCVN 23:2016/BYT; Law No. 84/2015/QH13, Art. 7; Circular No. 04/2014/TT-BLDTBXH, Art. 5 2. QCVN 34:2018/BLDTBXH, Clause 2.2.3 3. QCVN 34:2018/BLDTBXH, Clause 2.1.1, Clause 2.2.1 4. Law No. 84/2015/QH13, Art. 16
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 OHS (occupational health and safety) risk assessment does not cover the security department, the water pump station, the wastewater treatment plant, or confined spaces. The factory has not conducted a risk assessment for transmittable diseases (e.g. blood-borne pathogens) at the factory.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	Circular No. 07/2016/TT-BLDTBXH, Art. 3; Circular No. 07/2016/TT-BLDTBXH, Art. 3
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 suitable PPE such as warm coats, hats, and gloves for kitchen staff who must enter cold storage areas (3-5 degree Celsius). 2. The factory does not have inspection records available for rolling ladders and portable ladders at the materials and finished goods warehouse. The factory also does not have inspection records available for the fall protection equipment (body harnesses and helmets) at the maintenance department.
Recommendation for Immediate Action	1. Provide suitable PPE to the kitchen staffs who enter cold storage areas. 2. Conduct regular safety inspections of all ladders and fall protection equipment. Maintain records of these inspections on file.
Compliance Classifications	Immediate Action Required
Local Law	1. Law No. 84/2015/QH13, Art. 7; Circular No. 04/2014/TT-BLDTBXH, Art. 5; Circular No. 26/2016/TT-BYT 2. Law No. 84/2015/QH13, Art. 16
Benchmark ID	HSE.14.2
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 certification training for workers operating high-risk machines such as electric steamers, pressure vessels, and the laser cutting machine, as required by law.
Recommendation for Immediate Action	Provide proper training and certification for workers operating high-risk machines.
Compliance Classifications	Immediate Action Required

Local Law	Decree No. 44/2016/ND-CP, Article 17; Decree No. 140/2018/ND-CP. Article 1(5).
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.
Finding Details	The factory has not taken sufficient proactive steps to reduce repetitive-motion stress or injuries. In particular, the factory has not provided chairs with back rests for jobs requiring prolonged seating (such as stitching, buffing and cementing) nor has it provided anti-fatigue mats for jobs requiring prolonged standing (such as die-cutting, lasting, and inspecting).
Recommendation for Immediate Action	Provide chairs with back rests and anti-fatigue mats to all workers whose job tasks require them.
Compliance Classifications	Immediate Action Required
Local Law	Law No. 84/2015/QH13, Art. 16

## Hours Of Work (HOW)

Benchmark ID	HOW.3
Benchmark Details	Employers shall provide reasonable meal and rest breaks, which, at a minimum, must comply with national laws.
Finding Details	Worker interviews found that the eight gardening workers who work outside the factory buildings do not receive the same short 5-minute breaks from 9:55am to 10:00am and from 14:55pm to 15:00pm as other workers. The gardening workers explained that they cannot hear the announcement of the break and that there is no arrangement from the their supervisors to institute the break.
Recommendation for Immediate Action	Ensure that all workers, including workers in the gardening team, receive the breaks called for in factory procedures.

Compliance Classifications	Immediate Action Required
Local Law	Law No.45/2019/QH14, Article 109
<b>Nondiscrimination (ND)</b>	
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	During worker interviews, multiple female workers reported that during hiring interviews, the factory asks female workers whether they are currently nursing a child under 12 months. These workers reported that if the applicant replies that she is, the factory encourages her to withdraw her application and apply again once the child reaches 12 months. Although the assessment found that the factory does employ female workers nursing children under 12 months, these reports raise a high risk of discrimination in recruitment and hiring.
Recommendation for Immediate Action	Communicate the recruitment policy of the factory, including non-discrimination elements, to all relevant supervisors, staff, and workers. Avoid asking any questions not related to the job during application, recruitment, or hiring.
Compliance Classifications	Uncorroborated Risk of Non-Compliance
Local Law	Law No.45/2019/QH14, Article 136
Benchmark ID	ND.5
Benchmark Details	There shall be no differences in compensation for workers for work of equal value on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, social group or ethnic origin.

Finding Details	The factory provides a monthly skill incentive bonus ranging from VND150,000/month to VND550,000/month based on "performance," "quality," and "working attitude," with scores from one to five for each criteria. However, the factory does not provide guidance on how to evaluate these criteria in order to ensure fairness, consistency, and non-discrimination. The evaluation is solely based on the relevant supervisor's comments and suggestions.
Recommendation for Immediate Action	1. Review and update all relevant policies and procedures for allowances and incentives based on local law and FLA Benchmarks to ensure that supervisors implement the incentive program fairly without discrimination. 2. Assign responsibility for implementing and monitoring all FLA Code elements and employment functions. 3. Provide training for all relevant workers and departments on the newly updated policies and procedures. 4. Conduct regular internal assessments to ensure that all legal requirements and FLA benchmarks are followed and implemented. 5. Conduct a review of management systems to ensure that FLA Code elements and employment functions are implemented effectively and to make continuous improvement.
Compliance Classifications	Immediate Action Required
Local Law	Law No.45/2019/QH14, Article 90

