

# Fair Labor Association: Independent External Factory Assessment

Assessment Date :

**12 Sep 2022**



## Factory Information

FLA Affiliates	Arena S.p.A.
Country	Turkey
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

Compensation (C)	18
Employment Relationship (ER)	9
Forced Labor (F)	1
Health, Safety And Environment (HSE)	10
Hours Of Work (HOW)	7

## Assessment Information

Assessor	Sinan Doven
Assessment Date	12 Sep 2022

Assessment Purpose	
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## ASSESSMENT RESULTS

### Compensation (C)

Benchmark ID	C.25.2.1
Benchmark Details	Advances must be properly documented and their receipt and accuracy must be confirmed by the relevant worker in writing (e.g. signature, thumbprint).
Finding Details	Due to the transparency issues related to falsification of documents in this assessment (mentioned at HOW 22.2, HOW 22.4 and HOW 22.5) the assessment could not properly verify that the factory handles wage advances properly.
Recommendation for Immediate Action	All compensation records should be accurate and complete.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	C.21.2
Benchmark Details	All benefits shall be calculated correctly
Finding Details	Due to the transparency issues related to falsification of documents in this assessment (mentioned at HOW 22.2, HOW 22.4 and HOW 22.5) the assessment could not properly verify that the factory calculates worker benefits accurately.
Recommendation for Immediate Action	All compensation records should be accurate and complete.
Compliance Classifications	Immediate Action Required

Local Law	
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	Due to the transparency issues related to falsification of documents in this assessment (mentioned at HOW 22.2, HOW 22.4 and HOW 22.5) the assessment could not properly verify this benchmark.
Recommendation for Immediate Action	All compensation records should be complete and accurate.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	C.12.1
Benchmark Details	All legally mandated deductions for taxes, social insurance, or other purposes shall be deposited each pay period in the legally defined account or transmitted to the legally defined agency. This includes any lawful garnishments for back taxes, etc.
Finding Details	The assessment reviewed production records which make clear that workers perform overtime work. The factory pays workers for this overtime work in cash and does not list these hours on the social security payroll to ensure that deductions are made. In general, due to the transparency issues related to falsification of documents in this assessment (mentioned at HOW 22.2, HOW 22.4 and HOW 22.5) the assessment could not properly verify that compensation practices at the factory align with the FLA Code.
Recommendation for Immediate Action	(1) All compensation records should be complete and accurate. (2) Overtime compensation should be listed on social security payroll to make proper contributions. (3) All compensation should be paid through bank deposits. (4) All workers should be registered in the social security system, including daily workers.

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.
Finding Details	Due to the transparency issues related to falsification of documents in this assessment (mentioned at HOW 22.2, HOW 22.4 and HOW 22.5) the assessment could not properly verify that the factory calculates payments accurately.
Recommendation for Immediate Action	All compensation records should be accurate and complete.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	C.6
Benchmark Details	All wages, including payment for overtime, shall be paid directly and in full within legally defined time limits. When no time limits are defined by law, compensation shall be paid at least once a month.
Finding Details	Due to the transparency issues related to falsification of documents in this assessment (mentioned at HOW 22.2, HOW 22.4 and HOW 22.5) the assessment could not properly verify that the factory pays workers in full and on time.
Recommendation for Immediate Action	All compensation records should be accurate and complete.
Compliance Classifications	Immediate Action Required

Local Law	
Benchmark ID	C.8
Benchmark Details	All workers shall be credited with all-time worked for an employer for purposes of calculating length of service and determine the benefits to which workers are entitled.
Finding Details	Due to the transparency issues related to falsification of documents in this assessment (mentioned at HOW 22.2, HOW 22.4 and HOW 22.5) the assessment could not properly verify that the factory credits workers for length of service properly.
Recommendation for Immediate Action	All compensation records should be accurate and complete.
Compliance Classifications	Immediate Action Required
Local Law	
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	Due to the transparency issues related to falsification of documents in this assessment (mentioned at HOW 22.2, HOW 22.4 and HOW 22.5) the assessment could not properly verify that the factory compensates overtime work accurately.
Recommendation for Immediate Action	All compensation records should be accurate and complete.
Compliance Classifications	Immediate Action 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	Severance payments at the factory do not include food and transportation allowances. In general, due to the transparency issues related to the falsification of documents in this assessment (mentioned at HOW 22.2, HOW 22.4 and HOW 22.5) the assessment could not properly verify that compensation practices at the factory align with the FLA Code. Note: This was also a finding in 2013 SCI.
Recommendation for Immediate Action	(1) Severance payments should include food and transportation allowances. (2) All compensation records should be complete and accurate.
Compliance Classifications	Immediate Action Required
Local Law	
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.
Finding Details	Due to the transparency issues related to falsification of documents in this assessment (mentioned at HOW 22.2, HOW 22.4 and HOW 22.5) the assessment could not properly verify that the factory's payroll is accurate.
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	Due to the transparency issues related to falsification of documents in this assessment (mentioned at HOW 22.2, HOW 22.4 and HOW 22.5) the assessment could not properly verify that workers at the factory understand their compensation.
Recommendation for Immediate Action	(1) Severance payments should include food and transportation allowances. (2) All compensation records, including worker pay slips, should be complete and accurate.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	C.18.1
Benchmark Details	Employers shall not use hidden or multiple payroll records in order to hide overtime, to falsely demonstrate hourly wages, or for any other fraudulent reason.
Finding Details	Due to the transparency issues related to falsification of documents in this assessment (mentioned at HOW 22.2, HOW 22.4 and HOW 22.5) the assessment could not properly verify that bookkeeping at the factory is accurate.
Recommendation for Immediate Action	All bookkeeping records should be complete and accurate.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	C.2

Benchmark Details	Employers shall pay workers at least the legal minimum wage or the prevailing industry wage, whichever is higher, for regular working hours (not including overtime). Workers should also be informed about the legal minimum wage.
Finding Details	Due to the transparency issues related to falsification of documents in this assessment (mentioned at HOW 22.2, HOW 22.4 and HOW 22.5) the assessment could not properly verify that workers receive minimum wage.
Recommendation for Immediate Action	All compensation records should be accurate and complete.
Compliance Classifications	Immediate Action Required
Local Law	
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.
Finding Details	Due to the transparency issues related to falsification of documents in this assessment (mentioned at HOW 22.2, HOW 22.4 and HOW 22.5) the assessment could not properly verify that workers receive legally-mandated benefits.
Recommendation for Immediate Action	All compensation records should be accurate and complete.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	C.15.1.1
Benchmark Details	Employers shall provide workers a pay statement each pay period and not less frequently than once a month, which shall show earned wages.

Finding Details	Worker pay slips do not record compensation payments made in cash. In general, due to the transparency issues related to the falsification of documents in this assessment (mentioned at HOW 22.2, HOW 22.4 and HOW 22.5) the assessment could not properly verify that compensation practices at the factory align with the FLA Code.
Recommendation for Immediate Action	(1) All compensation records should be complete and accurate. (2) All compensation should be listed on worker pay slips accurately.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	C.15.1.7
Benchmark Details	Employers shall provide workers a pay statement each pay period and not less frequently than once a month, which shall show final total wage.
Finding Details	Due to cash payments not being listed on the pay slips, the final total wage reflected on the slips is not accurate. In general, due to the transparency issues related to falsification of documents in this assessment (mentioned at HOW 22.2, HOW 22.4 and HOW 22.5) the assessment could not properly verify that compensation practices at the factory align with the FLA Code.
Recommendation for Immediate Action	(1) All compensation records should be complete and accurate. (2) All compensation should be listed on worker pay slips accurately.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	C.15.1.2
Benchmark Details	Employers shall provide workers a pay statement each pay period and not less frequently than once a month, which shall show wage calculations.

Finding Details	The factory's pay slips include a calculation of wages, but only for those hours and wages reflected on the pay slip. The calculation of hours and cash payments made outside the pay slip is not recorded. In general, due to the transparency issues related to falsification of documents in this assessment (mentioned at HOW 22.2, HOW 22.4 and HOW 22.5), the assessment could not properly verify that compensation practices at the factory align with the FLA Code.
Recommendation for Immediate Action	(1) All compensation records should be complete and accurate. (2) All compensation should be listed on worker pay slips accurately.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	C.16.2
Benchmark Details	No one can receive wages on behalf of a worker, unless the worker concerned has, in full freedom, authorized in writing for another person to do so.
Finding Details	Due to the transparency issues related to falsification of documents in this assessment (mentioned at HOW 22.2, HOW 22.4 and HOW 22.5) the assessment could not properly verify that workers receive their wages directly.
Recommendation for Immediate Action	All compensation records should be complete and accurate.
Compliance Classifications	Immediate Action Required
Local Law	
<b>Employment Relationship (ER)</b>	
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	For the majority of FLA Code elements and Employment Functions, the facility does not provide ongoing training to workers. The facility only provides such training on health & safety topics.
Recommendation for Immediate Action	Provide ongoing periodic training to workers on the FLA Code elements and Employment Functions.
Compliance Classifications	Immediate Action 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 no written policies and procedures, nor does it take steps, to encourage ongoing training of all categories of workers with the goal of raising or broadening skills in order to 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 does not 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.
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	The factory has no written policies and procedures with regard to promotion, demotion, and job reassignment
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	

Benchmark ID	ER.4
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	Neither the FLA Code nor the Participating Company's own code of conduct is posted in the factory, nor are they communicated with the workers.
Recommendation for Immediate Action	Post the FLA Code of Conduct in the language(s) understood by the workforce and actively communicate it to workers.
Compliance Classifications	Immediate Action 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 employer's signature was missing on 9 out of 40 sampled worker contracts. Note: This was also a finding in 2013 SCI.
Recommendation for Immediate Action	All employment contracts should be signed by the employer.
Compliance Classifications	Immediate Action 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 factory's orientation training does not cover the majority of FLA Code elements and Employment Functions. The training covers only health & safety. Note: This was also a finding in 2013 SCI
Recommendation for Immediate Action	Provide orientation trainings to all new workers on all elements of the FLA Code.
Compliance Classifications	Immediate Action 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 does not have the practice to review its policies and procedures.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER.21.2
Benchmark Details	Wages must be paid on regular working days and in principle at or near the workplace. Workers must be free from any coercion to make use of enterprise or works stores.



Finding Details	Due to the transparency issues related to falsification of documents in this assessment (mentioned at HOW 22.2, HOW 22.4 and HOW 22.5) the assessment could not properly verify that the factory pays workers during regular working days.
Recommendation for Immediate Action	All compensation records should be complete and accurate.
Compliance Classifications	Immediate Action Required
Local Law	

## Forced Labor (F)

Benchmark ID	F.9
Benchmark Details	Workers shall retain possession or and control of their passports, identity papers, travel documents, work permits, and other personal legal documents.
Finding Details	A review of the factory's production records revealed that migrant workers from Syria work in the factory as daily workers. However, the factory could not provide any documentation related to these workers, such as payment records, permits, employment contracts, hours of work records, documentation of social security, etc.
Recommendation for Immediate Action	The factory should be fully transparent regarding its employment of daily workers and migrant workers. Factory management should conduct this employment relationship in full alignment with the FLA Code.
Compliance Classifications	Immediate Action 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 assessment observed three partially obstructed emergency exit aisles in the weaving and sewing sections. The factory corrected this finding during the course of the assessment. Note: This was also a finding in 2013 SCI.
Recommendation for Immediate Action	Keep all emergency exit aisles unblocked at all times.
Compliance Classifications	Immediate Action Required
Local Law	
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 thinner and machine oils in the warehouse section had no secondary containment. The factory corrected this finding during the course of the audit.
Recommendation for Immediate Action	Implement secondary containment for all chemicals.
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	The workers are provided PPE properly for working at high noise areas. (This is not a violation but just to note that there are places above 85 decibel in the factory)
Recommendation for Immediate Action	
Compliance Classifications	
Local Law	
Benchmark ID	HSE.14.1
Benchmark Details	All production machinery, equipment and tools shall be properly guarded and regularly maintained.
Finding Details	The assessment observed 4 overlock machines without guards on the lower pulleys. The factory corrected this finding during the audit.
Recommendation for Immediate Action	Keep all machines properly guarded at all times.
Compliance Classifications	Immediate Action Required
Local Law	
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) The assessment observed two fire extinguishers that were not marked and two fire extinguishers that were obstructed. The factory corrected this finding during the course of the assessment. (2) There was no eye wash station in the warehouse section, where thinner and machine oils are kept. The factory corrected this finding during the course of the assessment. Note: This was also a finding in 2013 SCI.
Recommendation for Immediate Action	(1) All fire extinguishers should be marked and unblocked (2) An eye wash station should be provided for all chemicals whose MSDS forms indicate one.
Compliance Classifications	Immediate Action Required
Local Law	
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 health and safety experts contracted by the factory reported 8,840 working minutes at the facility. Per local law, the experts should have worked at least 13,780 minutes given the size of the factory's workforce. (2) Four staircases are missing anti-slip bands. (3) Tagging guns used at the factory had no registration system. (4) Workers who work while standing are not provided with ergonomic mats. Note: This was a finding in 2013 sci. (5) Four out of the 40 sampled employment contracts included information on the results of HIV tests.

Recommendation for Immediate Action	(1) Review the health and safety expert's duty hours to align with local law, based on the number of workers. (2) Provide anti-slip mats or strips where necessary. (3) Track or register tagging guns to each user to ensure safety. (4) Provide ergonomic mats for standing workers. (5) Remove sensitive health information from the workers' contracts.
Compliance Classifications	Immediate Action 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	The assessment observed two workers working at heights without safety belts/harnesses for fall protection.
Recommendation for Immediate Action	Provide PPE (fall protection) for all work performed at heights and ensure its use.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	HSE.10.1
Benchmark Details	Material Safety Data Sheets (MSDS) for all chemicals and hazardous substances used in the workplace must be available at the usage and storage sites of the chemicals and hazardous substances, in the local language and the language spoken by workers, if different from the local language.
Finding Details	MSDS forms were not posted for thinner and machinery oils in the warehouse section. The factory corrected this issue during the audit.
Recommendation for Immediate Action	MSDS should be available for all chemicals.

Compliance Classifications	Immediate Action Required
Local Law	
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	The factory's drinking water safety test only analyzes a sample taken from one water dispenser, although there are 21 water dispensers at the factory.
Recommendation for Immediate Action	Analyze all drinking water dispensers to test drinking water safety.
Compliance Classifications	Immediate Action Required
Local Law	
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	Worker interviews revealed that approximately 15% of the workers either had not received or could not recall crucial information from the orientation training on PPE and other health & safety topics. Note: This was also a finding in 2013 SCI.
Recommendation for Immediate Action	Health & safety trainings should be effective.
Compliance Classifications	Immediate Action Required

Local Law	
<b>Hours Of Work (HOW)</b>	
Benchmark ID	HOW.22.2
Benchmark Details	Accurate time records shall be maintained by employers, including overtime, breaks, and leave.
Finding Details	The assessment found discrepancies between the attendance records provided for review and the factory's production records. Production records show that work was performed on designated rest days in July and September 2022, but the provided attendance records do not reflect this work. The factory eventually provided payment slips for the workers who worked on Sundays; however, due to the falsified records, the assessment could not verify the true working hours, overtime hours, and compensation at the factory. Furthermore, factory records indicate that there were daily workers at the factory, including Syrian migrant workers. Factory management had not previously provided any information related to these daily workers.
Recommendation for Immediate Action	All records related to employment and social compliance should be complete and accurate. The factory should provide all such records for review by independent monitors.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	HOW.22.4
Benchmark Details	Employers shall not maintain multiple time-keeping systems and/or records.

Finding Details	The assessment found discrepancies between the attendance records provided for review and the factory's production records. Production records show that work was performed on designated rest days in July and September 2022, but the provided attendance records do not reflect this work. The factory eventually provided payment slips for the workers who worked on Sundays. Furthermore, factory records indicate that there were daily workers at the factory, including Syrian migrant workers. Other information provided for review had not mentioned any information related to these daily workers.
Recommendation for Immediate Action	All records related to employment and social compliance should be complete and accurate. The factory should provide all such records for review by independent monitors.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	HOW.14
Benchmark Details	Employers shall provide workers taking annual leave their normal or average wages for the full period of annual leave in advance, unless specified differently under national laws, regulations and procedures.
Finding Details	Sampled records indicate that one worker had accumulated 11 days' of unused annual leave, accumulated over multiple years. Note: This was also a finding in 2013 SCI.
Recommendation for Immediate Action	Encourage workers to use annual leave on time.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	HOW.21



Benchmark Details	Other than in exceptional circumstances, the total weekly work hours (regular work hours plus overtime including any alternative shifts such as 4x4 or 3x3) shall not exceed 60 hours per week.
Finding Details	Due to the transparency issues related to falsification of documents in this assessment (mentioned at HOW 22.2, HOW 22.4 and HOW 22.5) the assessment could not properly verify that workers work under 60 hours per week.
Recommendation for Immediate Action	All records related to hours of work should be complete and accurate.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	HOW.12.2
Benchmark Details	The time at which annual leave is taken is determined by employers in consultation with workers, taking into account work requirements and the opportunities for rest and relaxation available to workers.
Finding Details	The factory's annual leave committee consists of three employer representatives and two worker representatives. This distribution is not in line with local law. Per local law, at facilities with more than 100 employees, a leave committee should consist of 3 persons: 1 person representing the employer and 2 persons representing the employees.
Recommendation for Immediate Action	Reassign members of the leave committee to align with local law.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	HOW.22.5
Benchmark Details	Time records maintained shall be authentic and accurate.

Finding Details	<p>The assessment found multiple inconsistencies between production records and the attendance records provided for review. Production records show that work was performed on designated rest days in July and September 2022, but the provided attendance records do not reflect this work. The factory eventually provided payment slips for the workers who worked on Sundays; however, due to the falsified records, the assessment could not verify the true working hours, overtime hours, and compensation at the factory. Furthermore, factory records indicate that there were daily workers at the factory, including Syrian migrant workers. Factory management had not previously provided any information related to these daily workers.</p>
Recommendation for Immediate Action	The factory should be consistent and transparent in all documentation.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	HOW.2
Benchmark Details	Workers shall be entitled to at least 24 consecutive hours of rest in every seven- day period. If workers must work on a rest day, an alternative consecutive 24 hours must be provided within that same seven-day period or immediately following.
Finding Details	<p>The assessment found discrepancies between the attendance records provided for review and the factory's production records. Production records show that work was performed on designated rest days in July and September 2022, but the provided attendance records do not reflect this work. The factory eventually provided payment slips for the workers who worked on Sundays; however, due to the falsified records, the assessment could not verify the true working hours, overtime hours, and compensation at the factory. Furthermore, factory records indicate that there were daily workers at the factory, including Syrian migrant workers. Factory management had not previously provided any information related to these daily workers.</p>

Recommendation for Immediate Action	(1) All records, including payroll documents, employee rosters, pay slips, production records, and hours of work records, should be complete and accurate. (2) Guarantee at least 24 consecutive hours of rest in every seven day period, for all workers.
Compliance Classifications	Immediate Action Required
Local Law	

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