

Fair Labor Association: Independent External Factory Assessment

Assessment Date :

10 Jul 2023



Factory Information

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| FLA Affiliates | New Balance Athletics Inc.,Puma SE |
| Country | Cambodia |
| Number of Workers | 2789 |

Understanding this Report

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

FLA Code Element

Number of Violations

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| Compensation (C) | 4 |
| Employment Relationship (ER) | 8 |
| Harassment Or Abuse (H/A) | 3 |
| Health, Safety And Environment (HSE) | 16 |
| Hours Of Work (HOW) | 2 |

Assessment Information

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| Assessor | Openview - Vietnam |
| Assessment Date | 10 Jul 2023 |

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| Assessment Purpose | Factory Assessment (In-Person) |
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ASSESSMENT RESULTS

Compensation (C)

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| 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 | 1. By interviewing workers and reviewing time records, the assessment found that workers clock in more than 15 minutes before the working shift. Further investigation noted that workers work before the shift starts to meet the productivity target. The interview noted that workers are not forced to work before their shifts, but the factory does not have clear regulations to monitor and ensure that workers are not working before their shifts. The working time before shifts start is not paid. 2. There are two canteen staffers who work from 4:00am to 12:00pm. The factory only pays these workers the normal salary for their work during overnight hours (4:00am to 5:00am) instead of at least 130% the normal rate, as is legally required. |
| Recommendation for Immediate Action | 1. Ensure to pay for all working time of workers; well communicate to workers on the working hour policy. 2. ensure to pay working hour in night time as per local law. |
| 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. |

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| Finding Details | As a general practice, the seniority indemnity is paid every 6 months (in the salary of June and December) for normal workers. However, those workers who are in the maternity leave during June or December do not receive it in those salaries. Instead it is paid in the salary of the month when they return to work. For example, a worker had maternity leave from May 09, 2022 to August 09, 2022 and an undefined-duration contract starting from January 02, 2023. Her seniority indemnity allowance was paid in the salary of August 2022 instead of June 2022, as is legally required. |
| Recommendation for Immediate Action | Ensure to pay the Undefined Duration Contract indemnity on time in June and December as per legal and factory's regulation. |
| 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 | 1. Interviews with leaders and HR department revealed that the HR team will cut-off automatically if workers do not work in 6 consecutive working days. There is no evidence to prove how workers get back to complete the resignation. The factory does not pay final payouts for these resigned workers. 2. As explained from the person in charge, if workers work full day, they can get the daily "blue-light" incentive paid by cash at the end of the day according to the calculation of IE department. A sampled worker is reported as abandoned worker from June 07, 2023 and not provided with the daily blue-light incentive from June 07, 2023 . But the further check notes that this worker worked full in June 2023. The factory explained that this is a manual mistake from the HR department in the abandon list provided to Accountant department to provide the daily blue-light incentive and this worker is not an abandon case. |
| Recommendation for Immediate Action | 1. Ensure to have a clear procedure to contact workers in case workers leaving job in 6 days and ensure to pay the final for them as per legal requirement. 2. Ensure to pay incentive correctly to all workers as per factory's regulation. |

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| 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 | 1. As a general practice, if workers resign on the same day they inform to factory, the final payouts will be paid in cash on 10th of the following month instead of within 48 hours from the resignation date as per legal requirement. For example, a worker resigned on November 24, 2022, and the final payout was paid in cash on 10th of December 2022 instead of within 48 hours from the resignation date. The factory explains that the factory needs time to arrange the work so it is hard for them to pay the final payouts within 48 hours after the resignation date. 2. Female workers who are feeding child less than 12 months are not entitled to two legal paid nursing breaks with 30-minute duration each break. The workers are not informed on their rights to have this breastfeeding time. Noted that there are 90 affected workers at the time of assessment. |
| Recommendation for Immediate Action | 1. Ensure to pay the final payout within 48 hours from the resignation date. 2. Ensure to provide 1 hours breast-feeding time for the first year of their child's life for the women employees returning from maternity leave. |
| Compliance Classifications | Immediate Action Required |
| Local Law | |

Employment Relationship (ER)

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| Benchmark ID | ER.1.2 |
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| 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 does not provide ongoing training to workers on all FLA Code elements and Employment Functions/Management Functions. The factory only provides a training on workplace Harassment and Non-Discrimination to workers on an annual basis. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |
| 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 regular training to supervisors on the Code Elements and Employment Functions. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |
| Benchmark ID | ER.1.1 |

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| 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 not developed policies and procedures governing all aspects of retrenchment. 2. As a general practice, factory provides workers 18 annual leave days for the 1st working year. From the 2nd working year, factory adds 2 extra annual leave days for each working year, maximum up to 30 annual leave days in a year. However, this is not applied for resigned workers. When calculate the annual leave for resigned workers, the factory only adds 1 day for every 3 working years. The factory does not have specific regulation for this difference practice. 3. The factory provides a "blue-light" incentive to sewing, QC, and mechanic departments daily, ranging from 500 Riel/day to 20,000 Riel/day; a group incentive daily to the cutting department ranging from 500 Riel/day to 20,000 Riel/day; and a monthly incentive for workers and staffs from \$3/month to \$50/month. However, the factory has not developed detailed guidance or criteria on how workers are evaluated to determine these benefits. |
| 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 that encourage ongoing training with the goals of raising or broadening workers' skills so they can advance in their careers. |

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| 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 to govern steps and processes, linkages to job grading, nondiscrimination, written feedback, and compliance with legal requirement. |
| 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 not developed policies and procedures on promotion, demotion, and job re-assignment in order to implement following the local laws and FLA Code. |

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| 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 does not have an effective system to ensure that workers are consulted or integrated in the decision-making process for decisions that may impact workplace and working conditions (e.g., creation or revision of policies and procedures, changes on production processes, hours of work, etc.). |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |
| 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 factory does not ensure the disciplinary system includes a third-party witness during imposition, and an appeal process. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |

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| Local Law | |
| Harassment Or Abuse (H/A) | |
| Benchmark ID | H/A.10.1.2 |
| Benchmark Details | Body searches and physical pat downs shall only be undertaken when there is a specific, legitimate reason to do so and upon consent of workers, unless a state official with the power to do so (e.g. police officer) has ordered the search. |
| Finding Details | The factory conducts a body pat-down to check for security at the end of working time. Although it is a same-gender search, there is no written guidance on how and when the security pat-down is allowed and how it should be conducted to respect all principles of local laws and FLA Codes. |
| Recommendation for Immediate Action | Only conduct pat-down when there is obvious reason and when allowed by a formal, approved guidance of the factory. |
| Compliance Classifications | Immediate Action Required |
| Local Law | |
| Benchmark ID | H/A.10.1.3 |
| Benchmark Details | Body searches shall not be undertaken in public and the person who undertakes the search shall be of the same sex as the person who is being searched. |
| Finding Details | The factory's pat-downs (see finding H/A.10.1.2) are not conducted in a private room. |
| Recommendation for Immediate Action | Only conduct pat-down when there is obvious reason, when allowed by the formal guidance of the factory, and in private areas. |
| Compliance Classifications | Immediate Action Required |

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| Local Law | |
| Benchmark ID | H/A.8.3 |
| Benchmark Details | Employers, shall develop, implement and monitor policy and procedures for eliminating the risk of violence, harassment, and abuse in the workplace. Policies and procedures shall include a clear statement that violence, harassment, and abuse will not be tolerated, procedures for the investigation of allegations, and measures to protect any complainants, victims, and witnesses. |
| Finding Details | The factory has a written policy on harassment or abuse issued on January 13, 2023, but the factory has not developed a system to discipline supervisors, managers, and workers who engage in any form of Harassment or Abuse. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |

Health, Safety And Environment (HSE)

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| Benchmark ID | HSE.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 | Not all emergency exits open in the direction of evacuation. Two out of five emergency exit doors at the warehouse building are rolling doors instead of an outward-opening door. |

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| Recommendation for Immediate Action | Ensure all emergency exits open in the direction of evacuation. |
| 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 identification label is not in the local language for observed color varnish bottle at mechanic room. There is no identification label, nor label of main hazards, for 7 out of 9 oil tanks at generator areas. |
| Recommendation for Immediate Action | Ensure to provide chemical labels in local language and post labels of main hazards for all chemicals. |
| 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 | 1. There is sufficient hand soap and municipal water, but there is no toilet tissue in worker toilet areas. In addition, one out of two drying machines at worker toilets did not work during assessment. 2. The factory does not keep food samples at expat kitchen to investigate in case of needed. |

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| Recommendation for Immediate Action | 1. Ensure to provide toilet tissue, drying facilities in the toilet areas. 2. Ensure to keep food samples incase of investigation needed. |
| 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 | There is no heat stress management procedure. In addition, there is no heat stress assessment to identify areas, processes or operation with thermal comfort problems such as heat transfer, ironing process, electrician, boiler, air compressor, and kitchen area. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |
| Benchmark ID | HSE.14.1 |
| Benchmark Details | All production machinery, equipment and tools shall be properly guarded and regularly maintained. |

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| Finding Details | 1. There is no convex mirror at the intersections within the factory premises to help workers check for approaching vehicles. There are no markings for pedestrian walk paths in the factory compound for traffic safety. In addition, there is no warning sign for forklift hazards, nor are there designated forklift routes at materials warehouse. 2. The rolling ladder and straight ladder are not in good working condition. One out of three rolling ladders at the central warehouse and one out of two portable straight ladders at the diesel tank area are missing the crossbar at the top step. 3. There is no LOTO (Lockout and Tagout) program for equipment and machines that should be locked and tagged during repair/maintenance. In addition, the factory does not have proper LOTO devices. |
| Recommendation for Immediate Action | 1. Install convex mirrors at blunt ends of intersection roads within factory premises, provide visible markings for traffic lanes, walk paths, post forklift warning sign, and clearly mark forklift traveling routes at materials warehouse. 2. Ensure all portable ladders are in good working condition with proper safety mechanisms. 3. Use proper LOTO devices for all machines and equipment that must be locked and tagged during maintenance/repair. |
| 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. There is no appropriate equipment (correct PPE, breathing apparatus) for members of the fire brigade in the factory to use for fire-fighting. 2. The factory has kept inspection logbook for the fire hoses, fire extinguishers, exit signs, and emergency lights, but there is no inspection/ operation logbook for the fire pumps. 3. The factory has an eyewash device, but does not have emergency showers at chemical storage warehouse. |

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| Recommendation for Immediate Action | 1. Provide appropriate equipment (correct PPE, breathing apparatus) for members of fire brigade to use for fire-fighting. 2. Ensure to conduct inspection on fire pumps and record it on the logbook. 3. Ensure to install emergency shower at the chemical storage warehouse, and spot cleaning room. |
| Compliance Classifications | Immediate Action Required |
| Local Law | |
| Benchmark ID | HSE.22.2 |
| Benchmark Details | All workers handling food must be trained and/or certified to work in the facility preparing or serving food. |
| Finding Details | The factory does not provide special health and safety/hygiene training to all six cook staffs working at the expat kitchen and canteen. |
| Recommendation for Immediate Action | Provide special health and safety/hygiene training to all cook staffs. |
| Compliance Classifications | Immediate Action Required |
| Local Law | |
| 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 has acquired an air emissions permit for the biomass boiler, but there is no air emissions permit for the power generators. |

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| Recommendation for Immediate Action | Ensure to have air emissions permit for power generators. |
| 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 OHS (occupational health and safety) risk assessment does not cover the maintenance workshop, spot cleaning room, waste storage area, chemical storage area, oil tank, work at heights, confined spaces, or electrical work. 2. There is no control device (such as filter) for air emissions from power generators. 3. The factory neither has ACM (asbestos contaminated materials) management procedure, nor has it taken proper steps to ensure that workers are not exposed to asbestos. 4. There is no assessment to identify asbestos-suspected materials (e.g., insulation materials, construction materials). In addition, there is no test report to prove compliance for these asbestos suspected materials. |
| Recommendation for Immediate Action | 1. Conduct OHS risk assessment covering all potential related risks. 2. Install control device for air emission from power generators. 3. Establish ACM management procedure, take proper steps to ensure that workers are not exposed to asbestos. |
| Compliance Classifications | Immediate Action Required |
| Local Law | |
| Benchmark ID | HSE.28 |
| Benchmark Details | Employers shall create a system to ensure that all necessary Health and Safety protections are provided for external contractors; including protection when working within , confined spaces, maintenance issues, and general Health and Safety Issues. |

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| Finding Details | The factory has established a contractor safety management procedure, but does not provide safety information or issue work permits to onsite contractors. |
| Recommendation for Immediate Action | |
| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |
| Benchmark ID | HSE.29 |
| Benchmark Details | Employers shall provide all necessary protection for workers when working at heights, confined spaces, and other high-risk areas. |
| Finding Details | 1. The factory has locks to prevent unauthorized entry, but there is no danger warning sign, no "authorized access only" sign, and no regulations to cover work in confined spaces, including nine elevator pits at production buildings and warehouse building and two server rooms at office building. 2. There is no safe operating procedure for work in confined spaces (ensure safe atmosphere, rescue equipment) to train to relevant workers. |
| Recommendation for Immediate Action | 1. Define and post warning signs and "restricted area" signs to ensure alert and safe work for confined spaces. 2. Develop guidance and ensure safety operation implemented for confined space work. |
| Compliance Classifications | Immediate Action Required |
| Local Law | |
| Benchmark ID | HSE.17.2 |
| Benchmark Details | Employers shall train workers in proper lifting techniques, and items such as lifting belts shall be provided. |
| Finding Details | The factory does not provide training to workers on ergonomics, including lifting techniques especially for heavy physical demanding work (loading, unloading heavy objects) in the warehouse. |

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| Recommendation for Immediate Action | Provide training to workers on ergonomics, including lifting techniques especially for heavy physical demanding jobs (loading, unloading heavy objects). |
| 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 | The MSDS is not in place for chemical named color varnish which is used to paint old machine at mechanic room. |
| Recommendation for Immediate Action | Ensure to obtain and post MSDS for all chemicals in the workplace, in the proper language(s). |
| 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 | The factory has provided orientational health and safety training to workers at the beginning of their employment, but there is no refresher PPE training for existing workers. |
| Recommendation for Immediate Action | Provide refresh health and safety training to all workers at least yearly, including training on PPE. |

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| Compliance Classifications | Immediate Action Required |
| Local Law | |
| 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 training to those workers working with electrical issues, working in confined spaces, working at heights, or whose work requires lockout/tagout. The factory has only provided orientation training to these workers at the beginning of their employment. |
| Recommendation for Immediate Action | Provide safety training to workers working with electrical issues, confined space, lockout/ tagout, work at heights. |
| Compliance Classifications | Immediate Action Required |
| Local Law | |
| 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 provided ergonomic short-breaks twice a day at 9am and 2pm, 03 minutes per break; however, the factory has not taken more proactive steps to reduce repetitive-motion stress or injuries. In particular, the factory does not have backrest chairs for prolonged seating jobs (accessories inspection, heat transfer) at material warehouse, nor anti-fatigue mats for prolonged standing jobs (inspecting, ironing, cutting) at warehouse and production workshops. |
| Recommendation for Immediate Action | Ensure to provide backrest chair for prolonged seating jobs, anti-fatigue mat for prolonged standing jobs or other appropriate measure to minimize the working hazards. |

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| Compliance Classifications | Immediate Action Required |
| Local Law | |
| 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 | As a general practice, workers from sewing and packing areas worked overtime for 3 to 4 hours in a day in the period of July 2022 to July 2023, while the local laws only allows maximum overtime work for 2 hours in a day. |
| Recommendation for Immediate Action | Ensure the overtime of workers is in line with the local law |
| 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 | As a general practice, around 30% of workers in the sewing and packing sections worked from 61 to 70 hours in a week. The excessive working hours occurred for 1 to 4 weeks in a month in the period of July 1, 2022 to July 8, 2023. |
| Recommendation for Immediate Action | |

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| Compliance Classifications | Sustainable Improvement Required |
| Local Law | |

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