INDEPENDENT EXTERNAL ASSESSMENT REPORT



COMPANIES: Hugo Boss AG COUNTRY: China ASSESSMENT DATE: 11/29/16 ASSESSOR: FLA China PRODUCTS: Apparel NUMBER OF WORKERS: 337

FAIR LABOR ASSOCIATION.

Improving Workers' Lives Worldwide

Summary of Code Violations

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.

While it is important to note when violations of the FLA Workplace Code of Conduct occur, the purpose of these assessments is not simply to test compliance against a particular benchmark, but rather to develop an understanding of where and how improvements can be made to achieve sustainable compliance. Code of Conduct violations can be found throughout the course of an assessment of the employment and management functions, and are addressed in companies' action plans.

Findings and Action Plans

FINDING NO.1

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Policies & Procedures (Macro)

Finding Explanation

1. The factory does not have written policies or procedures on Personnel Development, Retrenchment, or Environmental Protection.

2. The factory's Recruitment & Hiring policies and procedures do not regulate the Recruitment & Hiring of contract, contingent, and temporary workers.

3. The factory's Workplace Conduct & Discipline procedures do not include steps for workers to appeal disciplinary actions taken against them.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1.1, ER.7.2, ER.19, ER.27, ER.28.1, ER.29.1, ER.30.1, ER.31, and ER.32.1; Health, Safety & Environment Benchmark HSE.5)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Due to the leaving of the original resposible person during the FLA SCI audit the factory couldn't complete reviewing the procedures, so furthermore the factory couldn't provide the update procedure. But now they have assigned a new resposible person and restart to review these procedures.

Action Plan no 2.

Description

Due to the leaving of the original resposible person during the FLA SCI audit the factory couldn't complete reviewing the procedures, so furthermore the factory couldn't provide the update procedure. But now they have assigned a new resposible person and restart to review these procedures.

Action Plan no 3.

Description

Due to the leaving of the original resposible person during the FLA SCI audit the factory couldn't complete reviewing the

procedures, so furthermore the factory couldn't provide the update procedure. But now they have assigned a new resposible person and restart to review these procedures.

FINDING NO.2

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Training (Macro)

Finding Explanation

1. The orientation training provided to new workers does not cover Compensation, Hours of Work, Industrial Relations, Health & Safety, or Human Resources (HR) policies. Furthermore, workers do not receive written documentation that substantiates any of the topics covered during orientation or a copy of the workplace rules.

2. The factory does not provide specific training for supervisors on national laws and regulations or the FLA Workplace Code, including any of the Employment Functions. Supervisors also have not been informed that they should not use any form of harassment or abuse to maintain discipline.

3. The factory does not provide training for the relevant HR personnel and administrative staff on Workplace Conduct & Discipline.

4. The factory does not provide ongoing training to workers on any of the Employment Functions, except for Health & Safety.

5. The factory does not provide any ongoing training to workers to raise or broaden their skills for career advancement.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1.2, ER.15, ER.17, ER.27, and ER.28; Compensation Benchmark C.17)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Due to the leaving of the original resposible person during the FLA SCI audit the factory couldn't complete reviewing the procedures, so furthermore the factory couldn't provide the update procedure. But now they have assigned a new resposible person and restart to review these procedures.

Action Plan no 2.

Description

Recently the factory hasn't updated any national rules, so the factory didn't make suitable communication. After update the factory plans to hold a meeting to promote the content.

Action Plan no 3.

Description

The factory plans to provide provide training for the relevant HR personnel and administrative staff on Workplace Conduct & Discipline and furthermore provide the documents as below:

- 1. transfer list
- 2. job description
- 3. factory policy.
- 4. SOP

Action Plan no 4.

Description

The factory plans to make attendance list or meeting minutes to record the training.

Action Plan no 5.

Description

For office workers the factory plans to prvide training as below: 1. the process of making shoes 2. understand the materials 3. more

office software using skill(like excel,powerpoint,word) for workers on line: 1.understand the materials and the skills to check quality 2.by exchange their post to develop more skills.

FINDING NO.3

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Communication & Worker Involvement (Macro)

Finding Explanation

1. The factory does not communicate with the general workforce regarding the Recruitment, Hiring & Personnel Development, Termination & Retrenchment, Industrial Relations, or Environmental Protection policies and procedures, or their updates. They do not communicate effectively regarding the Compensation, Hours of Work, Workplace Conduct & Discipline, Grievance System, or Health & Safety policies and procedures, or their updates. None of the supervisors or workers interviewed by assessors had a strong understanding of the factory's policies and procedures. Furthermore, the factory has not developed a plan to communicate future updates or legal revisions to the policies and procedures to the general workforce and management staff.

2. Only the Grievance System and Health & Safety policies and procedures are posted in the factory.

3. The worker integration component is missing across all Employment Functions. The factory has not established procedures to receive worker input or feedback on the creation, implementation, and revision of its policies and procedures. Workers are neither systematically integrated nor consulted in the decision-making processes.

4. The factory's Termination & Retrenchment procedures do not require management to arrange consultation meetings with workers or union representatives before reaching a final decision on layoffs.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1.2, ER.1.3, ER.16.1, ER.25, ER.27.3, ER.29, ER.30.2, and ER.32; Compensation Benchmark C.17)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Due to the leaving of the original resposible person during the FLA SCI audit the factory couldn't complete reviewing the procedures, so furthermore the factory couldn't provide the update procedure. But now they have assigned a new resposible person and restart to review these procedures.

Action Plan no 2.

Description

The factory plans to update the policy according to newest laws and post on the bulletin board.

Action Plan no 3.

Description

The factory plans to identify which kinds of policies are still required by checking the current procedure and which kind of policies could be combined with the union procedure.

Action Plan no 4.

Description

The factories Termination & Retrenchment procedures will be adjusted accordingly. The factory plans to have a consultation meetings with workers and union representatives concerning this topic.

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Review Process (Macro)

Finding Explanation

The factory does not have a review process to ensure that its policies and procedures are reviewed and updated according to local law and FLA Workplace Code requirements. As a result, the factory has not conducted an internal review of the policies and procedures for any of the Employment Functions.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1.3, ER.28.1.2, ER.29.1.1, ER.30.2, and ER.31.1)

COMPANY ACTION PLANS

Action Plan no 1.

Description

The factory plans to establish a review procedure as follows: 1. Identify all related regulations; 2. Find out the government web site to download the related regulations and check the newest regularly; 3. Ask their lawyer to update the regulation for them.

FINDING NO.5

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

1. There are five contract workers (canteen staff) in the factory. These contract workers are hired and paid by a food services provider; thus, the factory does not have a direct employment relationship with the canteen staff. The factory maintains these workers' employment agreements, but not their personnel files or proof of age documentation; only the food services provider has access to these documents. As a result, assessors were unable to confirm that the factory is in compliance with local laws and FLA requirements regarding child labor.

2. The factory does not hire disabled workers, which is a violation of local legal requirements that state that at least 1.5% of the total workforce should be comprised of disabled workers. There are 335 workers in the factory; therefore, there should be at least five disabled workers. Although the factory contributes to the Employment Security Fund in lieu of employing disabled workers as allowed under local law, this practices carries a risk of discrimination.

Local Law or Code Requirement

The Regulations of Employment for Disability Person, Article 8; The Regulations of Banning Child Labor Recruitment, Article 4; FLA Workplace Code (Employment Relationship Benchmarks ER.2.1, ER.3, ER.4.1, and ER.11.5; Child Labor Benchmark CL.1; Non-Discrimination Benchmarks ND.1 and ND.2.1)

Recommendations for Immediate Action

1. Maintain personnel files, including proof of age documentation, for all contract workers. 2. Hire the legally required number of disabled workers.

COMPANY ACTION PLANS

Action Plan no 1.

Description

The factory will assign the new HR staff to follow up on this issue as the previous responsible person left the factory.

Action Plan no 2.

Description

The factory states, that they do hire disabled workers and have never rejected them due to their disability. For exsample, there was

one worker who lacks one finger hired by their vice president. Though the factory still does not hire enough disabled workers, because there are not too many disabled workers applying for a job and when they come they may leave.

FINDING NO.6

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Compensation

Finding Explanation

1. Before October 2016, the factory only paid CNY 1433 (USD 208) per month to six out of eight security guards, which was below the local minimum wage of CNY 1510 (USD 219) per month. (Overtime wages were calculated correctly, based on the minimum wage). In October 2016, the security guards' wages were adjusted to CNY 1510 (USD 219) per month. The factory pays all other workers the correct minimum wage.

2. The factory provides all workers with all five types of legally required social insurances. However, the factory calculates its social insurance contributions based on the local minimum contribution base rather than workers' actual wages. Around 95% of workers covered by social insurance have monthly wages ranging from CNY 2160 to CNY 5953 (USD 313 to USD 863), but the local minimum contribution base is only CNY 2408 (USD 349).

3. The factory does not maintain the payroll records for any of the contract workers (canteen staff). Therefore, the accuracy of payments made to contract workers could not be verified.

4. The factory calculates paid annual leave based on the number of years workers have been employed by the factory rather than their cumulative years of working experience prior to and including the factory, as required by law. The factory currently gives 30% of workers five days of annual leave and 15% of workers ten days of annual leave; however, based on their cumulative working experience, these workers are actually eligible for 10 and 15 days of annual leave respectively. In total, 151 workers (45% of the workforce) are eligible for more leave than they are provided.

5. According to the Housing Provident Fund receipt from December 2016, the factory only contributes to the legally required Housing Provident Fund for 148 out of 335 (44%) workers. Furthermore, the factory does not contribute to the Housing Provident Fund based on workers' actual wages, as required by law. For all of these 148 workers, whose monthly wages range from CNY 3609 to CNY 5953 (USD 523 to USD 863), the factory's Housing Provident Fund were calculated based on the local minimum contribution base of CNY 1510 (USD 219).

Local Law or Code Requirement

The PRC Labor Law, Articles 48, 72, and 73; The Housing Fund Management Regulation, Articles 15 and 17; The Worker Paid Annual Leave Regulation, Article 2; The Provisional Regulations for the Payment of Wages, Article 6; FLA Workplace Code (Employment Relationship Benchmarks ER.2.1 and ER.22.1; Hours of Work Benchmarks HOW.1.1, HOW.11, and HOW.14; Compensation Benchmarks C.1, C.2, C.5, C.10, C.14.1, and C.15)

Recommendations for Immediate Action

1. Pay the legal minimum wage to all security guards.

- 2. Calculate social insurance contributions based on workers' actual monthly wages, not the local minimum contribution base.
- 3. Maintain accurate payroll records for all contract workers and make these records available to assessors upon request.
- 4. Provide annual leave to all workers based on their cumulative working experience, as required by local law.

COMPANY ACTION PLANS

Action Plan no 1.

<u>Description</u> The factory pays all other workers the correct minimum wage.

Action Plan no 2.

Description

The factory plans to implement the following steps: 1. The factory needs to figure out the impact on their factory operating; 2. Make new budget and find a way to reduce the impact and apply to get the approval from headquarter.

Action Plan no 3.

Description

The factory will check with the canteen contractor and make the record or not after last audit.

Action Plan no 4.

Description

The factory plans to implement the following steps: 1. The factory figures out the annual leave of workers according to the working experience in their factory; 2. Declaration to each worker; 3. Explanation of a process to submit their proof of working experience with other factories (such as social security payment certificate); 4. After proof the factory will revise the annual leaving days.

Action Plan no 5.

Description

The factory plans to implement the following steps: 1. Figuring out the impact on their factory operating; 2. Generating new budget and find a way to reduce the impact, and apply to get the approval from headquarter.

FINDING NO.7

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Hours of Work

Finding Explanation

From November 2015 to October 2016 (except for February and March 2016), 80% of the general workforce (workers in all departments) worked between 37 and 134 hours of overtime per month, exceeding the legal limit of 36 hours per month.
From November 2015 to October 2016, 70% of the general workforce (workers in all departments) worked between 3.5 and 4 hours of overtime per day, exceeding the legal limit of three hours per day.

3. From November 2015 to October 2016 (except for February, March and April 2016), 70% of the general workforce (workers in all departments) worked between 63 and 84 hours per week, exceeding the FLA limit of 60 hours of work per week.

4. Workers do not receive at least one day off (24 consecutive hours of rest) for every seven-day period. During the peak months (January 2016, and from June to October 2016), 60% of the general workforce (workers in all departments) worked between eight and 23 consecutive days.

5. The factory's production plan includes 60 hours per week (40 regular hours plus 20 overtime hours) on a regular basis.

6. The factory does not maintain records of any of the contract workers' working hours.

Local Law or Code Requirement

The PRC Labor Law, Articles 38 and 41; The Provisional Regulations for the Payment of Wages, Article 6; FLA Workplace Code (Employment Relationship Benchmarks ER.2.1 and ER.23; Hours of Work Benchmarks HOW.1, HOW.2, and HOW.8)

Recommendations for Immediate Action

1. Ensure that workers' overtime hours do not exceed the legal limit of 3 hours per day or 36 hours per month.

- 2. Ensure that workers' weekly working hours do not exceed 60 hours per week.
- 3. Provide workers at least 24 consecutive hours of rest in every seven-day period.
- 4. Do not include overtime in production planning.

5. The FLA-affiliate's Sourcing and Social Compliance teams should implement FLA Principles of Fair Labor and Responsible Sourcing and, to help the factory address its excessive hours issue, coordinate accordingly on the following topics: how to provide better order forecasts to the factories; possible workshops/consultancy for the factory on how to improve productivity/quality; clear guidelines on how to extend shipment deadlines in case of contingencies; steps that factory management must follow if overtime is inevitable; clear guidelines on the calculation and setting of reasonable production targets that will not demand work beyond regular working hours or during breaks; and clear guidelines on how and when the factory can use subcontractors and/or temporary workers to avoid excessive overtime.

COMPANY ACTION PLANS

Action Plan no 1.

Description

The factory has restricted overtime and just allwos 3 hours of OT per day. Furthermore, the factory prohibits work on sundays. According to every factory production situation, the PC dept. reviews and adjusts the orders.

Action Plan no 2.

Description

The factory has restricted overtime and just allwos 3 hours of OT per day. Furthermore, the factory prohibits work on sundays. According to every factory production situation, the PC dept. reviews and adjusts the orders.

Action Plan no 3.

Description

The factory has restricted overtime and just allwos 3 hours of OT per day. Furthermore, the factory prohibits work on sundays. According to every factory production situation, the PC dept. reviews and adjusts the orders.

Action Plan no 4.

Description

The factory has restricted overtime and just allwos 3 hours of OT per day. Furthermore, the factory prohibits work on sundays. According to every factory production situation, the PC dept. reviews and adjusts the orders.

Action Plan no 5.

Description

The factory has adjusted their system and can provide workers at least 24 consecutive hours of rest in every seven-day period now.

Action Plan no 6.

Description

The factory has implemented the following steps: 1. Restricting overtime on 3 hours per day, and no Sunday work. 2. The PC dept. reviews and adjusts the orders regulary.

Action Plan no 7.

Description

The factory maintains records of contract workers' working hours now.

FINDING NO.8

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Industrial Relations

Finding Explanation

The factory has a trade union under the ACFTU (All-China Federation of Trade Unions) that was established in 2013. Although the factory has a written procedure pertaining to union representative elections, there are no records indicating that any elections have been held. Instead of being elected by workers directly, the factory management assigns all 10 union representatives.
Factory management automatically enrolled 90 workers as trade union members without the workers' consent. The factory does not keep a list of union members. About 95% of the interviewed workers did not know if they were members of the trade union.
The factory does not pay union dues to local Federation of Trade Union.

4. FLA Comment: The Chinese constitution guarantees Freedom of Association; however, the Trade Union Act prevents the establishment of trade unions independent of the sole official trade union – the All-China Federation of Trade Unions (ACFTU). According to the International Labor Organization (ILO), many provisions of the Trade Union Act are contrary to the fundamental principles of freedom of association, including the non-recognition of the right to strike. As a consequence, all factories in China fall short of the ILO standards on the right to organize and bargain collectively. Recently, however, the government has introduced new regulations that could improve the functioning of the labor relations' mechanisms. The Amended Trade Union Act of October 2001 stipulates that union committees have to be democratically elected at members' assemblies and trade unions must be accountable to their members. The trade union has the responsibility to consult with management on key issues of importance to their members and to sign collective agreements. It also grants the trade union an enhanced role in dispute resolution. In December 2003, the Collective Contracts Decree introduced the obligation for representative trade unions and employers to negotiate collective agreements, in contrast to the previous system of non-negotiated

Local Law or Code Requirement

The PRC Labor Union Law, Article 42; FLA Workplace Code (Employment Relationship Benchmark ER.2; Freedom of Association Benchmarks FOA.1, FOA.2, FOA.10, and FOA.11)

COMPANY ACTION PLANS

Action Plan no 1.

Description

The factory plans to implement the following steps: 1. Review the status about the union members; 2. Review the original prcedure; 3. Organize a team to prepare the election of union members.

Action Plan no 2.

Description

The factory plans to implement the following steps: 1. Review the status about the union members; 2. Review the original prcedure; 3. Organize a team to prepare the election of union members.

Action Plan no 3.

Description

The factory has applied this through our budget process and they are waiting to get the approval from their headquaters.

FINDING NO.9

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Workplace Conduct & Discipline

Finding Explanation

1. The factory uses monetary fines as part of its disciplinary system in addition to oral warnings, warning letters, and termination. Workers are fined between CNY 5 (USD 0.72) and CNY 100 (USD 14.50) if they violate factory rules (e.g. a worker who takes one day of unauthorized leave would be fined CNY 100).

2. The disciplinary system does not include a third-party witness during the imposition of disciplinary action or during the appeal process.

Local Law or Code Requirement FLA Workplace Code (Employment Relationship Benchmark ER.27.4; Harassment or Abuse Benchmark H/A.2)

<u>Recommendations for Immediate Action</u> Cease using monetary fines as a discipline practice.

COMPANY ACTION PLANS

Action Plan no 1.

<u>Description</u> The factory has ceased using monetary fines as a discipline practice. Action Plan no 2.

Description

The factory plans to announce the one who is around as a third party witness or an union member.

FINDING NO.10

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Environmental Protection

Finding Explanation

1. The factory has not installed secondary containers for the glue being used in the sewing workshop.

2. The factory has not resubmitted its environmental impact assessment documents to the local environmental protection bureau since adding the silk-screen process to production in June 2016.

Local Law or Code Requirement

The Regulations on the Safety Administration of Dangerous Chemicals, Article 20; The PRC Environmental Impact Assessment Law, Article 24; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.4, and HSE.9.1)

Recommendations for Immediate Action

Provide secondary containers for all chemicals.

Re-submit the environmental impact assessment documents and get approval from the local environmental protection bureau.

COMPANY ACTION PLANS

Action Plan no 1.

<u>Description</u> The factory plans to install secondary containers for the glue being used in the sewing workshop.

Action Plan no 2.

<u>Description</u> The factory decided to cancel the silk-screen process.

FINDING NO.11

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. None of the glue containers in the lasting workshop are labeled with their contents and hazards.

2. The factory only provides annual occupational health examinations to six out of 23 workers who are in contact with hazardous chemicals. Furthermore, the factory does not provide occupational health examinations to any of the workers who are in contact with hazardous chemicals before they take or leave their posts.

3. There is no eye washing station in the shoe assembly workshop, where hazardous chemicals are used.

Local Law or Code Requirement

The Regulation for Chemical Usage Safety in Work Place, Article 14; The PRC Law of Prevention and Control of Occupational Diseases, Article 36; The PRC Law of Prevention and Control of Occupational Diseases, Article 26; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE. 6 and HSE.9)

Recommendations for Immediate Action

1. Label all chemical containers with their contents and hazards in the local language.

2. Provide pre-employment, post-employment, and annual occupational health examinations to all workers exposed to hazardous chemicals, as required by law.

3. Provide eye wash stations in all areas where hazardous chemicals are used, including the shoe assembly workshop.

COMPANY ACTION PLANS

Action Plan no 1.

Description

The factory has labelled all chemical containers with their according their content and hazards.

Action Plan no 2.

Description

The factory plans to implement the following steps: 1. Identify the workers who are in contact with hazardous chemicals; 2. Arrange them to get annual occupational health examinations

Action Plan no 3.

Description

The factory has ordered the eye washing station and will install it immediately.

FINDING NO.12

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. There are no needle guards on any of the four sewing machines in the sewing workshop and there is no pulley guard on the edgepolishing machine in the sample making workshop.

2. The factory does not have a backup battery installed on the fire alarm system.

3. The factory does not train loading workers on proper lifting techniques or provide them with lifting belts.

4. The factory has not provided seated workers with chairs that are adjustable and have backrests, or with adjustable workstations in order to minimize workers' injuries. The factory does not provide standing workers with anti-fatigue mats.

Local Law or Code Requirement

The PRC Fire Prevention Law, Article 16; The Code of Design of Manufacturing Equipment Safety and Hygiene (GB5083-1999), Article 6.1.6; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.5, HSE.6, HSE.14, and HSE.17)

Recommendations for Immediate Action

1. Install needle guards on all sewing machines and pulley guards on all edge polishing machines.

- 2. Install a backup battery for the fire alarm system.
- 3. Provide loading workers with lifting belts and training on their proper use.

COMPANY ACTION PLANS

Action Plan no 1.

Description

The factorty has installed needle guards on all sewing machines and pulley guards on all edge polishing machines.

Action Plan no 2.

Description

The factory plans to install a backup battery for the fire alarm system.

Action Plan no 3.

Description

The factory plans to train loading workers on proper lifting techniques or provide them with lifting belts.

Action Plan no 4.

Description

The factory plans to provide seated workers with chairs that are adjustable.

FINDING NO.13

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. Two of the five canteen staff have not obtained health certificates.

2. Canteen workers are not certified to prepare and serve food.

3. The factory trained some workers on first aid internally, rather than arranging for them to be trained and certified by a local hospital or the Red Cross.

4. Contact information for emergency medical response is not posted near each phone or throughout the factory.

5. The factory does not have construction safety acceptance reports for the production, dormitory, or office buildings.

6. The factory did not obtain an occupational disease hazard assessment report before beginning operations in 2002. It has never

conducted an assessment of the current condition of occupational disease hazards, as legally required.

7. The factory does not have a registration certificate or annual inspection report for the boiler, as legally required.

8. The molds and sundries warehouse is located on the first floor of one of the three-story dormitory buildings.

Local Law or Code Requirement

The Construction Law of the People's Republic of China, Article 61; The Fire Safety of Building Design Regulation (GB50016-2014), Article 3.3.5; The PRC Law On Food Safety, Article 45; The PRC Law of Prevention and Control of Occupational Diseases, Article 26; The Provisions on Safety Training for Production Operation Units, Article 4; The Special Appliance Quality Safety Monitoring Regulation, Articles 25 and 28; FLA Workplace Code (Health, Safety and Environment Benchmark HSE.1, HSE.4, HSE.6, HSE.22.2, and HSE.26)

Recommendations for Immediate Action

1. Arrange for all canteen staff to receive heath checks and obtain health certificates.

2. Train workers on first aid.

3. Obtain construction safety acceptance reports for the production, dormitory and office buildings from the local construction bureau.

4. Arrange for a licensed service provider to conduct an assessment of the current condition of occupational disease hazards. Review and respond to any hazards.

5. Obtain a registration certificate and annual inspection report for the boiler.

6. Relocate the molds and sundries warehouse to a separate building from the dormitory building.

Action Plan no 1.

<u>Description</u> The factory has asked the canteen contractor to arrage the staff to get the certifications.

Action Plan no 2.

<u>Description</u> Canteen workers have gotten the new certifications.

Action Plan no 3.

Description The factory trained 5-7 persons.

Action Plan no 4.

<u>Description</u> The factory has added the Hou-Jie hospital contact information in the Office Security room and canteen.

Action Plan no 5.

Description

As the factory area is rented, the factory has asked the village Committee to resolve this issue. The Village committee shared the following information: 1. They have gotten the approval for construction; 2. They haven't applied the completion acceptance. The factory plans to meet the secretary to discuss this topic again.

Action Plan no 6.

Description The factory has obtained an occupational disease hazard assessment.

Action Plan no 7.

Description The factory has just applied to receive an annual inspection report.

Action Plan no 8.

Description

The factory has moved the molds and sundries warehouse from the first floor of one of the three-story dormitory buildings to the eastern of the workshop.