

# INDEPENDENT EXTERNAL ASSESSMENT REPORT



COMPANIES: Under Armour, Inc.

COUNTRY: Philippines ASSESSMENT DATE: 12/21/16

ASSESSOR: FLA China

PRODUCTS: Apparel

NUMBER OF WORKERS: 1136

# **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: Review Process (Macro)

### **Finding Explanation**

The review process for the policies and procedures for Recruitment & Hiring, Hours of Work, Industrial Relations, and Workplace Conduct & Discipline, have a two-year timeline. The review process for Environmental Protection and Health & Safety policies and procedures have a one year timeline. There is no defined timeline to review and update the policies and procedures for Personnel Development, Compensation, Grievance System, and Termination & Retrenchment. ER.1.3, ER.29.1.1, and ER.30.2

### Local Law or Code Requirement

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

### COMPANY ACTION PLANS

# Action Plan no 1.

#### Description

The factory must identify the management person/team who/that:

1) will implement a formal (according to a written plan and schedule) regular and documented review process of policies, procedures for Personal Development, Compensation, Grievance system and Termination & Retrenchment; 2) setting appropriate timeline for review and ensure their implementation in a consultative (documented review of related documents, functional issues with current processes and proposed changes, with identified workers (names, id numbers, signatures/dates on an attendance sheet/in meeting minutes) manner and amend when warranted; 3) will enter into a formal written engagement with local legal counsel to periodically (no less that quarterly and promptly, as warranted, by the issuance of new, changes in, important laws, rules, regulations, decrees, etc.) brief the factory/guide them in implementing necessary functional/operational changes and revisions of related policies and/or procedures and according to changes in local law, regulations/FLA code and in response to internal/external audit results.

Planned Completion Date

12/31/17

### Planned completion date

11/25/17

### Company Action Plan Update

October 1, 2018:

- The factory has developed process to review all established policies and procedures with timelines.
- Grievance Handling Procedure, Recruitment & Hiring, Hours of Work, Industrial Relations, and Workplace Conduct & Discipline, Environmental Policy are already revised and included administration and review process and timeline.
- Personnel Development: compensation, termination and retrenchment revision is being finalized currently

# **FINDING NO.2**

# IMMEDIATE ACTION REQUIRED

# FINDING TYPE: Recruitment, Hiring & Personnel Development

### **Finding Explanation**

- 1. The probationary period for new workers is six months. While this practice meets local law requirement, this practice is not aligned with the three-month FLA requirement for probationary period. C.3
- 2. There is no documented performance review for production workers. Performance reviews are based on overall production line performance, as determined by supervisors, rather than on an individual level. Production workers who experienced problems in their work are provided coaching and training by supervisors and line leaders. ER.29
- 3. The factory only conducts individual performance reviews for probationary production workers and office workers. ER.29
- 4. While there are parts of the Employee Handbook that have local language translation, the majority of the contents are in English, including the training materials for new workers. ER.15
- 5. Employment contracts are in English. The Probationary Contracts, which are also in English, do not include information on the worker's legal benefits (thirteenth month pay, social insurance, etc.). ER.25.1

### Local Law or Code Requirement

Labor Code, Book 6, Title 1, Art. 281; FLA Workplace Code (Employment Relationship Benchmarks, ER.25.1 and ER.29; Compensation Benchmark C.3)

#### Recommendations for Immediate Action

Reduce the probationary period for new workers to a maximum of three (3) months.

# **COMPANY ACTION PLANS**

# Action Plan no 1.

#### Description

The Factory must identify the manager and team who will ensure that:

- 1. The probationary period for new workers is to reduce the probationary period for new workers to a maximum of three (3) months;
- 2. The factory has new, formal FLA Benchmark compliant written policies and procedures with regards to performance reviews for all employees including probationary staff. These reviews should 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. Management is to ensure that the performance review process is communicated to the workforce and reviewed regularly;
- 3. The entire written contents of the Employee Handbook must have local language translation, including the training materials for new workers.
- 4. The Employment contracts which include probationary employment contracts must be: a) Written in both English and local language and b) include information on the worker's legal benefits (thirteenth month pay, social insurance, etc.).

Planned Completion Date 12/30/17

### Planned completion date

11/25/17

Company Action Plan Update

October 1, 2018:

- 1. In progress: Shortening of probation period is still on going and under discussion with the top management. The topic will be discussed during Senior management meeting on November 16, 2018.
- 2. In progress: The corporate compliance has set guideline and procedure to conduct regular performance evaluation of all employees (pending supporting documentation)

- 3. In progress: The corporate CCTA has amended the handbook with translations to local language.
- 4. In progress: translation into English and local language is ongoing.

# FINDING NO.3

### IMMEDIATE ACTION REQUIRED

# FINDING TYPE: Workplace Conduct & Discipline

# **Finding Explanation**

- 1. Some of the factory's disciplinary procedures are too strict and not fair. For example: failure to work before and/or after a holiday would result in a six-day suspension on the first offense and a nine-day suspension on the second offense. Loitering on company time or engaging in unnecessary conversation during working hours is a two-day suspension on the first offense and a three-day suspension on the second offense. ER.27.1 and ER.27.2
- 2. It was reported in worker interviews that when only a few workers volunteered to perform overtime, a manager tore the overtime form in front of production workers to express anger. H/A.6
- 3. The security personnel perform pat downs to all workers when they leave the factory. In some instances, female security pats down male workers. H/A.10.2

### Local Law or Code Requirement

Philippine Labor Code, Chapter III, Art. 95; FLA Workplace Code (Employment Relationship Benchmark ER.27.1, ER.27.2.1; Harassment and Abuse Benchmark H/A.6 and H/A.10.2)

# Recommendations for Immediate Action

- 1. Revise disciplinary procedure to ensure all actions are fair and reasonable.
- 2. Ensure workers are not subjected to threats and/or psychological abuse to maintain labor discipline.
- 3. Cease the practice of pat-downs as a standard security procedure. As per FLA Code, pat-downs can only performed when there is legitimate evidence of theft and with permission from the relevant authorities. Ensure that all searches are performed by the same gender.

### COMPANY ACTION PLANS

# Action Plan no 1.

### **Description**

The Factory must identify the manager and team who will ensure that:

- 1. Revise disciplinary procedure to ensure all actions are fair and reasonable.
- 2. Ensure workers are not subjected to threats and/or psychological abuse to maintain labor discipline.
- 3. Cease the practice of pat-downs as a standard security procedure. As per FLA Code, pat-downs can only performed when there is legitimate evidence of theft and with permission from the relevant authorities. Ensure that all searches are performed by the same gender.

Planned Completion Date

12/30/17

# Planned completion date

11/25/17

### Company Action Plan Update

October 1, 2018:

- 1. In progress: Factory has revised the handbook with above mentioned amendments effective January 2017.
- 2. In progress; The Factory has installed suggestion box system to conspicuous areas to report any abuse and other issues. The Corporate CCTA has revised handbook.
- 3. In progress: Factory stopped pat downs, CCTVs at strategic areas and completed the project last August 2018.

# FINDING NO.4

# IMMEDIATE ACTION REQUIRED

FINDING TYPE: Hours of Work

#### Finding Explanation

- 1. The sampled overtime hours of some sewing lines showed that in June 2016, 30% to 40% of workers and 25% of workers in October 2016 worked more than 12 hours of overtime per week. During these weeks workers averaged 60 to 75 working hours per week. Also during these months, workers periodically worked on Sunday and holidays. HOW.1.3 and HOW.2
- 2. The pay-slip does not provide information on Sunday and Holiday work or the overtime wage calculation, although workers are being compensated correctly. C.13
- 3. The working hour records do not identify pregnant workers. There is no process in place to monitor the working hours of pregnant workers. HOW.5
- 4. Under work performance guidelines, workers will receive disciplinary action if they sign and agree to perform overtime but later rescind their agreement. The first offense is a written warning and the second offense is a two-day suspension. HOW.8
- 5. As reported by production workers, it is hard to apply for annual leave, even if the application has been submitted three days in advance of the requested days, as per the factory's policy. HOW.12

### Local Law or Code Requirement

Labor Code Chapter I Art.83; Chapter II Art.91; Philippine Labor Code, Chapter III, Art. 95; FLA Workplace Code (Hours of Work Benchmarks HOW.1.3, HOW.2, HOW.5, and HOW.8)

### Recommendations for Immediate Action

- 1. Ensure regular work week is not more than 48 hours; ensure workers do not work more than 60 hours a week, including overtime.
- 2. Provide workers with at least one day off (24-consecutive hours of rest) for every seven-day working period.
- 3. Include wage calculations and details of all hours and days worked on workers' pay slips, including work on Sundays and holiday.
- 4. Establish a system to identify workers who are pregnant and/or nursing and provide them the legally required protection.
- 5. Cease disciplinary practices for workers who are unable to perform overtime, even if they have previously committed to performing overtime.
- 6. Provide workers' annual leave when requested, as per the factory's policy procedures.

# **COMPANY ACTION PLANS**

# Action Plan no 1.

### Description

The Factory must identify the manager and team who will ensure that:

- 1. Ensure regular work week is not more than 48 hours; ensure workers do not work more than 60 hours a week, including overtime.
- 2. Provide workers with at least one day off (24-consecutive hours of rest) for every seven-day working period.
- 3. Include wage calculations and details of all hours and days worked on workers' pay slips, including work on Sundays and holiday.
- 4. Establish a system to identify workers who are pregnant and/or nursing and provide them the legally required protection.
- 5. Cease disciplinary practices for workers who are unable to perform overtime, even if they have previously committed to performing overtime.
- 6. Provide workers' annual leave when requested, as per the factory's policy procedures.

Planned Completion Date 12/30/17

### Planned completion date

11/25/17

### Company Action Plan Update

October 1, 2018:

- 1. Closed: Factory has implemented monitoring of overtime per week.
- 2. Closed: The factory has implemented rest day off of every Sunday or holiday work on payslip
- 3. In progress: : The management has included wage calculations and details of all hours and days worked on workers' pay slips, including work on Sundays and holiday. Factory introduced a new system to indicate pregnant/lactating workers. Still ongoing revision of system to include pregnant identification in system.
- 4. Closed: Factory ceased disciplinary practices for workers who are unable to perform overtime, even if they have previously committed to performing overtime.
- 6. Closed: Installed suggestion box to strategic areas to report any abuse and issues of forced labor

# IMMEDIATE ACTION REQUIRED

# FINDING TYPE: Health & Safety

### Finding Explanation

- 1. One exit sign in the production factory canteen is covered by Christmas decorations. HSE.5
- 2. There is only one exit in the canteen of the Central Warehouse. The occupancy of this location is approximately 50 persons. HSE.5
- 3. One workstation on the sewing line does not have immediate access to work floor aisles as it is surrounded by workstations and production materials. HSE.5
- 4. At least two corridors in the central warehouse and production factory are slippery due to rainwater that came in through the window. HSE.5
- 5. One arrow on the floor in the cutting section does not lead to the nearest exit. The factory does not have evacuation maps. HSE.5
- 6. The arrows on the floor outside the canteen of production factory does not lead to the nearest exit. HSE.5
- 7. There are no evacuation arrows on second floor of the warehouse building. HSE.5
- 8. The embroidery room does not have a visual alarm in case of emergency. HSE.5
- 9. Cartons of finish goods block the exit in the back of the factory near canteen. HSE.5
- 10. One fire hydrant in the production factory is only partially accessible as it has a production box underneath it. HSE.6
- 11. The fire extinguisher and fire alarm in the warehouse are blocked by cartons and inaccessible. HSE.6
- 12. There are three more persons scheduled to have Basic Occupational Safety and Health (BOSH) training in the coming months.

The production factory needs to have six full-time safety officers. In addition, the Central Warehouse needs to have five full-time safety officers. HSE.6

### Local Law or Code Requirement

Occupational Health and Safety Standards, Occupational Safety and Health Standards, Rule 1940 Fire Protection and Control, Sec. 1943.03 (8); Fire Code of the Philippines of 2008, Rule 10: Fire Safety in Buildings, Structures & Facilities, Division 5: Means of Egress, Sec. 10.2.5.11 & 10.2.5.12; Fire Code of the Philippines of 2008, Section 10.2.5.2 (G.1); Department Order No. 16 - Training and Accreditation of Personnel on Occupational Safety and Health, Sec. 1033(1)-(2); Fire Code of the Philippines of 2008, Rule 10: Fire Safety in Buildings, Structures & Facilities, Division 6: Features of Fire Protection, Sec. 10.2.6.7; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.5 and HSE.6)

### Recommendations for Immediate Action

- 1. Provide an additional exit for the canteen area with an illuminated exit sign. Ensure all exits are unobstructed and exits signs are visible.
- 2. Ensure workstations have clear access to aisles and are not obstructed by materials.
- 3. Ensure aisles are clear and marked with directional signs that point to nearest exit. Ensure corridors and pathways are protected from weather to avoid slippery conditions.
- 4. Install emergency revolving light in the embroidery room.
- 5. Keep firefighting equipment accessible at all times.
- 6. Maintain an adequate number of safety officers.

### COMPANY ACTION PLANS

# Action Plan no 1.

### Description

The Factory must identify the manager and team who will ensure that:

- 1. Provide an additional exit for the canteen area with an illuminated exit sign. Ensure all exits are unobstructed and exits signs are visible.
- 2. Ensure workstations have clear access to aisles and are not obstructed by materials.
- 3. Ensure aisles are clear and marked with directional signs that point to nearest exit. Ensure corridors and pathways are protected from weather to avoid slippery conditions.
- 4. Install emergency revolving light in the embroidery room.
- 5. Keep firefighting equipment accessible at all times.
- 6. Maintain an adequate number of safety officers.

Planned Completion Date 12/30/17

Planned completion date

11/25/17

#### Company Action Plan Update

1 October 2018:

- 1. Closed: The factory Compliance team has implemented weekly fire safety inspection. Exit signs are unobstructed.
- 2. Closed: The factory added additional exit door at canteen facility of vertex warehouse Implemented weekly fire safety inspection of the factory
- 3. Closed: The management implemented daily 6s, all workstations are cleared and free access to aisles.
- 4. The factory installed sealable windows at floor aisles at warehouse facility to stop water leaking.
- 5. In progress: The factory modified evacuation arrow at cutting area
- 6. In progress: The factory installed evacuation arrows at canteen
- 7. In progress: Installed wall evacuation arrows at warehouse second floor aisles
- 8. In progress: Visual alarm at embroidery area currently being installed
- 9, 10, 11: Factory conducts weekly fire safety inspections.
- 12. The factory compliance team will submit all untrained safety officers to BOSH training by end of year.

# **FINDING NO.6**

# IMMEDIATE ACTION REQUIRED

# FINDING TYPE: Health & Safety

### **Finding Explanation**

- 1. The electrical wires used for charging the fork lift battery are not permanent and are in a temporary plug outside. HSE.13
- 2. The extension cord in Carpentry has is spliced with electrical tape. HSE.13
- 3. The electrical outlet for the heat cutting machine (outside at the back of warehouse) is covered by plastic (due to rain dripping from the roof). HSE.13
- 4. The electrical outlet on the second floor near the drinking water station is not permanent and therefore not secure. HSE.13

#### Local Law or Code Requirement

FLA Workplace Code (Health, Safety & Environment Benchmark HSE.13)

### Recommendations for Immediate Action

- 1. Provide an electrical socket that is dedicated to charging the forklift battery.
- 2. Ensure electric extension cord is properly repaired or replaced.
- 3. Protect electrical sockets from weather, and ensure they are permanent and in good condition.

### COMPANY ACTION PLANS

### Action Plan no 1.

# Description

The Factory must identify the manager and team who will ensure that:

- 1. Provide an electrical socket that is dedicated to charging the forklift battery.
- 2. Ensure electric extension cord is properly repaired or replaced.
- 3. Protect electrical sockets from weather, and ensure they are permanent and in good condition.

Planned Completion Date 12/30/17

# Planned completion date

11/25/17

### Company Action Plan Update

October 1, 2018

- 1. Closed: The factory has installed permanent power supply for Forklift charging station
- 2. Closed: The facility had replaced all spliced extension cords
- 3. Closed: The factory Building maintenance section had repair any damages of roofs at Heat Cut section
- 4. Closed: Building maintenance installed permanent power supply for water dispensers

#### IMMEDIATE ACTION REQUIRED

# FINDING TYPE: Health & Safety

### **Finding Explanation**

- 1. At least one worker in Embroidery does not properly use earplugs; the foam is not properly inserted. Additionally, one worker in Sewing does not use the eye guards on the overlock machine. HSE.8
- 2. Tagging guns are shared. When the tagger at a line is absent, a tagging gun is borrowed from the maintenance department. The same tagging gun may also be used by other departments when their tagger is absent. Therefore, the same gun may be used by another person (with the same needle). HSE.19
- 3. Workers are exposed to vapors caused by the separation of elastic bands (garters) in the heat-cutting area. Although workers use respirators, it is unclear if workers use the correct respirator for this operation. HSE.7
- 4. Workers using the lift pallet truck do not wear safety shoes as the factory only provides safety shoes to some of the relevant workers. HSE.7 and HSE.8
- 5. Workers in the heat printing (sublimation) room do not wear the provided masks. The room has a strong smell due to the heat transfer operations. HSE.7 and HSE.8
- 6. The factory does not provide standing workers with anti-fatigue mats. HSE.17
- 7. Instead of standing, one operator of the automatic spreading machine was near-sitting position using back-frame, which is only a machine safety support and not intended for sitting. HSE.17
- 8. There are only a some signage to indicate the speed of the warehouse forklift. HSE.14.3
- 9. The warning signs for the oven in the washing area is small and in English, not in the local language. HSE.14.3
- 10. The safety signs of the fabric inspection machines are in Chinese and English; they are not offered in the local language. HSE.14.3
- 11. There is only one lifting instruction available in the finished good warehouse, which is in English. HSE.14.3
- 12. The warning sign for the movable ladder is missing safety instructions (e.g., use brakes when in use). HSE.14.3
- 13. There is no sign to remind workers to use brakes when forklift is charging. HSE.14.3
- 14. There is no sign on the heat cutting machine warning of its risks. HSE.14.3
- 15. Two out of four automatic spreading machines in the cutting section do not have warning lights. HSE.14
- 16. The loading dock is open, which poses a falling risk. HSE.14

### Local Law or Code Requirement

Rule 1080, Personal Protective Equipment, Occupational Safety and Health Standard; Rule 1076, General Ventilation, Occupational Safety and Health Standard; Rule 1005, Duties of Employers, Occupational Safety and Health Standard; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.7, HSE.8, HSE.14, and HSE.17.1)

# Recommendations for Immediate Action

- 1. Provide workers with the proper Personal Protective Equipment (PPE). Train workers on its use and monitor for consistent and proper use. Identify the appropriate type of PPE that should be provided.
- 2. Prevent the spread of blood-borne pathogens.
- 3. Provide training to operators on SOPs and safe operations when operating the automatic spreading machine.
- 4. Post warning and safety signs, in the local language on all special machines.
- 5. Post a speed limit sign for the forklift on the forklift and in different locations in the warehouse. Provide forklift operators with safety reminders.
- 6. Post lifting instructions (posters) in different locations throughout the warehouse.
- 7. Include instructions regarding brakes in the local language for the movable ladder. Install warning lights on the automating spreading machines.
- 8. Install a safety chain on the loading dock.

### COMPANY ACTION PLANS

# Action Plan no 1.

# **Description**

The Factory must identify the manager and team who will ensure that:

- 1. Provide workers with the proper Personal Protective Equipment (PPE). Train workers on its use and monitor for consistent and proper use. Identify the appropriate type of PPE that should be provided.
- 2. Prevent the spread of blood-borne pathogens.
- 3. Provide training to operators on SOPs and safe operations when operating the automatic spreading machine.
- 4. Post warning and safety signs, in the local language on all special machines.
- 5. Post a speed limit sign for the forklift on the forklift and in different locations in the warehouse. Provide forklift operators with safety reminders.

- 6. Post lifting instructions (posters) in different locations throughout the warehouse.
- 7. Include instructions regarding brakes in the local language for the movable ladder. Install warning lights on the automating spreading machines.
- 8. Install a safety chain on the loading dock.

Planned Completion Date 12/30/17

### Planned completion date

11/25/17

# Company Action Plan Update

October 1, 2018

- 1. In progress: The factory conducted PPE orientation and refresher training and included for 2017 Training calendar. (pending supporting documentation)
- 2. In progress: Still on going revision of procedures tagging gun
- 3. Closed: The Factory had conducted third party WEM in December 2017
- 4. In progress: The factory requested safety shoes to all employees involving manual handling of materials. on going until all employees involving manual handling will be given PPWE Safety Shoes, deadline November 18, 2018.
- 5. Closed: The factory has been providing PPE mask to operators in sublimation area after engineering controls has been applied to ensure safety of the workers
- 6. Closed: The Factory has provided anti stress mats to standing workers in January 2017
- 7. In progress: The Factory safety officers have oriented spreading machine operators regarding the safe positioning while doing his operation in January 2017 (pending supporting documentation)
- 8. Closed: The factory safety officers added speed limit signs to conspicuous areas at warehouse facility.
- 9. In progress: Factory Compliance team revised safety signs to local language where applicable. (to be verified on ground)
- 10. Closed: The factory safety officers have installed safety signs with local language of all inspection machines.
- 11. Closed:: The Factory safety Officers have installed Safety instruction of manual lifting to finished goods area
- 12. Closed: The Factory Safety Officers have installed Safety signs of all movable ladders and maintain regular checking of these identified equipment
- 13. Closed: The company safety Officers have installed safety signs of using brakes while the forklift is in idle
- 14. In progress: The Factory safety Officers installed safety signage of all heat cutting machines (to be verified)
- 15. In progress: The factory Safety Officers installed Andon safety lights to automatic spreading machines
- 16. Closed: Provided Safety Chains at Loading docks

# **FINDING NO.8**

#### SUSTAINABLE IMPROVEMENT REQUIRED

# FINDING TYPE: Health & Safety

### **Finding Explanation**

- 1. The lights in the food preparation and counter area do not have covers. HSE.13 and HSE.22
- 2. The factory only keeps food samples for 24 hours; the FLA requires food samples be kept for 72 hours. HSE.22
- 3. There is no source of ventilation in the washing area. The room only has an ceiling fan and open windows; however, the room has an oven and washing machines that generate heat. HSE.13
- 4. In the heat printing room, there is localized exhaust ventilation (LEV) and an open window; however, this it is insufficient to provide and circulate fresh air. HSE.13
- 5. The metal frame of the extended storage rack in the finish goods warehouse is warped. HSE.13
- 6. Cartons are placed on top of the storage racks and are at risk of falling. HSE.13
- 7. One pallet in the finish goods warehouse does not have a middle support frame. HSE.13
- 8. At least one pallet, located in the warehouse loading area for finished goods, was stored vertically (should be horizontal). HSE.13

# Local Law or Code Requirement

Rule 1150, Material Handling and Storage, Occupational Safety and Health Standard; Rule 1076, General Ventilation, Occupational Safety and Health Standard; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.5, HSE.13, and HSE.19)

# **COMPANY ACTION PLANS**

Action Plan no 1.

Description

Occupational Health and Safety Conditions Details

The factory must identify the person who will responsible to ensure;

- 1) To set up an effective housekeeping program and ensure: a) The implementation and maintaining of high standard level of cleanliness and hygiene at food preparation, kitchen and workers' dining area; b) the conditions of food preparation, kitchen and workers' dining area are such that: i) The lights in the food preparation and counter area must be provided with covers; ii) the factory must keep food samples for 72 hours as per the FLA requirements.
- 2) The Factory must identify the manager and team who will responsible: a) To adopt and documented training on 5S Housekeeping Program for all workers, including those in finish goods warehouse; b) to effectively implementing a housekeeping program at the workplace by removing fire and life safety issues at finish good warehouse and ensuring:
- i) To remove and replaced the warp metal frame of the extended storage rack in the finish goods warehouse;
- ii) to prevent goods falling from height and injuring worker by providing proper: i) Storage; ii) secure and iii) limit height of stacking of Cartons on the storage racks;
- iii) all pallets used in the factory must be monitored and checked: i) To remove and replaced damaged pallet and ii) to proper stored by placing horizontal on flat ground or surface.

Ventilation system

3) To improve the ventilation system in Washing Area and Heat Printing Room by implementing these possible measures include: a) Improving the air circulation by both providing both natural and forced ventilations; b) install mechanical ventilation to artificial drying of the air and c) screens to protect against radiant heat;

Planned Completion Date

12/30/17

### Planned completion date

11/25/17

# Company Action Plan Update

October 1, 2018

- 1. In progress: The Factory is Conducting Daily roving Of canteen facility to check the sustainability of canteen food safety memorandum
- 2. In progress; Food sample policy and procedure under revision
- 3. Closed: The Factory has installed additional fans at washing area to increase air movement velocity in January 2017
- 4. Closed: The Factory Building maintenance Installed additional window at heat printing room in February 2017
- 5. Closed: The Factory Building Maintenance Repaired damaged racks in January 2017
- 6. Closed: The Factory Building maintenance Created racks intended for cartons Completed January 2017
- 7. In progress: The Factory Safety Officers is conducting daily inspection of racks to check the integrity of racks On Going Until December 2018.
- 8. In progress: The Factory Safety Officers in conducting daily safety inspection to warehouse.