



FAIR LABOR  
ASSOCIATION®

## INDEPENDENT EXTERNAL ASSESSMENT REPORT



COMPANIES: Under Armour, Inc.

COUNTRY: Jordan

ASSESSMENT DATE: 10/03/18

ASSESSOR: FLA EMEA

PRODUCTS: Apparel

NUMBER OF WORKERS: 965

## 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: Health & Safety

##### Finding Explanation

1. The factory's Health & Safety procedures do not include the following components:
  - a. Standard Operating Procedures (SOPs) for each job with a focus on performing the job safely;
  - b. Measures to protect the reproductive health of workers through minimizing exposure to workplace hazards;
  - c. Steps for workers to raise health and safety concerns;
  - d. Protection against retaliation for workers who raise health and safety concerns;
  - e. Emergency assembly areas;
  - f. Steps on how to ensure that all personnel, visitors, contractors, service providers safely evacuated;
  - g. A list of equipment and/or machines that require lockout-tagout (LOTO);
  - h. Guidance documents for external contractors/service providers concerning health and safety. [ER.1, ER.31]

##### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1 and ER.31)

#### COMPANY ACTION PLANS

##### Action Plan no 1.

##### Description

- I. The facility shall identify the manager who will be responsible for ensuring that implementation of all listed requirements is completed in a timely and effective manner, and that evidence of the implementation is provided to the Under Armour Sustainability Team. This manager must ensure that at a minimum: The facility has a clear and transparent system of worker and management communication that enables workers to consult with and provide input to management. This might include suggestion boxes, workers committees, designated spaces for worker meetings, and meetings between management and workers' representatives.
- II. The facility shall identify the manager who will be responsible for ensuring that written, documented policies and procedures are developed or updated to address all listed requirements, and that copies of the policies and procedures are provided to the Under Armour Sustainability Team. This manager must ensure that at a minimum: The facility ensures that women are not engaged in work that constitutes a substantial risk to their reproductive health.
- III. The factory must identify the top manager and teams who will
  1. Develop Health, Safety, and Environmental policies and procedures that are transparent and fair in their implementation. These

policies and procedures should be in compliance complying with legal minimum health, safety, and environmental standards, regulations and procedures.

2. Facilitate communication with and active participation from workers on the development of the policies and procedures, continuous training to broaden worker skills, and develop a mechanism for workers to express their views and opinions on Health, Safety, and Environmental policies and procedures.

3. Facilitate ongoing evaluations and revisions of policies and procedures.

4. Provide continuous training for all workers, supervisors, and managerial staff on the new policies and procedures.

5. Include information on the new Health, Safety, and Environmental policies and procedures during worker orientation or induction process.

6. Designate staff with the responsibility for policy/procedure enforcement and implementation.

7. Provide workers with documents detailing the information that is covered during the orientation or induction process.

Please send us supporting documentation such as attendance sheets, photos of notices posted throughout the factory, etc.

## Action Plan no 2.

### Description

I. The factory must identify the person who will ensure that: 1) Appropriate lockout/tag out procedures should be employed during all equipment maintenance and repair work; 2) working tools must be provided with appropriate protective devices to prevent injury to workers from squeezing, cuts or burns; 3) to conduct a thorough hazard and risk assessment on all machinery used in the factory; 4) to provide tracking, identify and coded machinery that is medium and high risk; 5) to control and reduce such risk exposure to worker by implementing a permit to work and LOTO system; 6) to conduct capacity training to all employees that require to implement the system and 7) ensuring there is inspection and monitoring in the workplace when LOTO is apply to machinery during: a) Maintenance; b) servicing and c) installation.

## FINDING NO.2

### SUSTAINABLE IMPROVEMENT REQUIRED

#### FINDING TYPE: Training (Macro)

### Finding Explanation

1. The factory provides ongoing training to the workers and supervisors on all of the Employment Functions. However, the training schedule is not systematic and there is no tracking system in place to ensure that every employee receives ongoing training. In addition, some existing workers participate in the orientation training provided to new workers as a form of refreshment training. [ER.1, ER.15, ER.17]

2. The written documentation provided to workers does not substantiate all issues covered during orientation such as environmental protection, industrial relations and grievance mechanism.

3. Workers do not receive a copy of the workplace rules during orientation. Written document provided only covers dormitory rules. Workplace rules which are in accordance with law posted on notice boards.

### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.15, and ER.17)

### COMPANY ACTION PLANS

## Action Plan no 1.

### Description

Sustainable Improvements Required:

I. The factory must identify the person who will conduct documented educational sessions (in, and with materials in,) any applicable dialects and languages, with its workers, supervisors and managers about their legal rights and responsibilities, and its written personnel policies covering topics such as: 1) wages; 2) benefits; 3) deductions; 4) vacations; 5) leave; 6) regular hours; 7) overtime hours; 8) regular and overtime pay rates; 9) discipline and termination; 10) grievance procedures, 11) harassment/abuse, 12) the Under Armour Code of Conduct; 13) the Fair Labor Association's Workplace Code of Conduct (<http://www.fairlabor.org/our-work/labor-standards> and related benchmarks (copies attached here); 14) incentive schemes; 15) promotion; 16) job-re-assignment, and 17) compliance with all applicable laws. Going forward, the factory also must address these topics with newly hired personnel in documented meetings. The meeting documentation should be filed in each worker's personnel file, and include: 1) the date of the meeting; 2) a completed checklist of the topics covered; 3) the worker's typed/printed name and (factory identification number (FIN), if applicable) workers' signature, and 4) the typed/printed name (FIN, if applicable), the title and the signature of the factory representative that conducted the meeting. The factory must document its efforts (interactive training, with questions and answers

about the topics/sections) to ensure that all: 1) managers; 2) supervisors and 3) workers are knowledgeable (know the topics/sections/content) of both: a) the Under Armour Code of Conduct and b) the Fair Labor Association's Workplace Code of Conduct (<http://www.fairlabor.org/our-work/labor-standards> and related benchmarks

Please send us supporting documentation for the ongoing training, such as a schedule for training, attendance sheets, and photos.

Planned completion date

12/10/18

Action Plan no 2.

Description

"The Factory must identify the manager and team who will ensure to conduct documented educational and orientation meetings for all employees:

1) The meeting topics and subjects covered must include: recruitment, hiring and personnel development, hours of work, wages & benefits, termination and retrenchment, workplace conduct, grievance system, explanations of the employers' rules, compensation package and policies for human resources, industrial relations, including respect of the right to freedom of association, health and safety, laws regarding workers' rights, working hours, and distribution of the FLA Code through appropriate means, including posters in local language(s) throughout the workplace's common areas;

2) Management must record, and update training on a regular (meaning at least every 3 months or more frequently, if, and as, needed) basis. Workers are to be provided with written documentation summarizing and reviewing all the information covered in the orientation briefing;

3) enhance orientation training to include environmental protection, industrial relations and grievance mechanisms, and ensure workers receive a copy of workplace rules at the end of their orientation process. Lastly, ensure workplace rules are in accordance with applicable local laws.

Please submit to us relevant training/orientation documentation; including PPTs, attendance sheets, orientation training materials, and training records, etc.

Planned completion date

12/10/18

### FINDING NO.3

#### IMMEDIATE ACTION REQUIRED

#### FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

1. Though the factory takes a very proactive approach towards communicating with the employment agencies it uses in order to eliminate all possible recruitment fees, migrant workers from Sri Lanka still report paying agency fees from 150 USD to 550 USD to the Bureau of Employment in Sri Lanka. [ER.5, ER.6, F.7]

2. All workers are registered for social security. However, if a worker is hired after the fifteenth day of the month they are not registered until the first day of the next month. Therefore, there may be a delay of up to 15 days. [ER.22]

3. The factory's job application forms include question regarding applicants' marital status. The job application form used by one of the recruitment agencies also requires information regarding applicants' marital status. [ER.3, ND.2]

4. Workers' employment contracts are not signed until two days to two months after they begin working at the factory. [ER.1]

5. The volunteer work form and the receipt of information acknowledgement forms in workers' personnel files are in Arabic and English, not in the language(s) spoken by migrant workers and signed by the workers. Workers also sign versions of these documents where the details are not entered. [ER.1]

6. The factory does not have written job descriptions for production positions. [ER.1]

Local Law or Code Requirement

Jordanian Labour Law No: 8 1996, Articles 3, 4, and 7; FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.3, ER.5, ER.6,

### Recommendations for Immediate Action

1. Ensure that workers do not pay any recruitment fees. Retroactively compensate any migrant workers who have paid recruitment fees in the past 12 months.
2. Register all workers for social security in a timely manner.
3. Remove questions regarding marital status from job application forms.
4. Ensure that all workers sign employment contracts on their first day of employment.
5. Ensure that the translated versions of employment documents are properly filled in, provided to workers for their review, and signed by workers.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

"No worker shall be subjected to recruitment fees (at origin/destination countries); including governmental fee, visas in their origin/destination countries. please conduct a comprehensive and documented review of the Dhaka Principles (attached), and ensure you address any noncompliance identified, report to us when/how any improvement areas identified are addressed, and the corresponding supporting documentation. Ensure to send to us the names/titles/date(s) of review by the managerial positions of the Dhaka Principles. also, communicate in writing, to all recruitment agencies/labor brokers, that all charges (in workers home country, and destination country) will be covered and paid by the factory. Request a written commitment which you will share with us, that no worker will be subjected to recruitment fees/visas/other charges. Lastly, please send to us a confirmation that going forward no migrant worker will be subjected to pay any form of recruitment fee, deductions at origin/destination countries, and that you will designate a manager/team responsible for ensuring and discussing with workers individually about any fees paid (or agreed to be paid), expenses paid (or agreed to be paid) including loans, interest payments, debt service, upon arrival, and make the corresponding reimbursements if when applicable.

Please identify the manager/team who/that will ensure:

1. Ensure that workers do not pay any recruitment fees. Retroactively compensate any migrant workers who have paid recruitment fees in the past 12 months.
2. Register all workers for social security in a timely manner.
3. Remove questions regarding marital status from job application forms.
4. Ensure that all workers sign employment contracts on their first day of employment.
5. Ensure that the translated versions of employment documents are properly filled in, provided to workers for their review, and signed by workers.

#### Planned completion date

12/10/18

### Action Plan no 2.

#### Description

"Senior factory management to consider engaging Verite to assist in, a remote, review of newly developed migrant worker policies and procedures, and a repayment plan (using the attached format), and provide to us the list of eligible workers for reimbursement, amounts to be paid as recruitment fees (exceeding or not sending countries legal limits), transportation, passport/government fees/visas, medical testing fees, travel insurance, and ANY other deductions migrant workers might had paid to get a job at the factory. Please indicate how/when factory intends to reimburse migrant workers. WHEN CALCULATING THE REIMBURSEMENTS, FACTORY MUST FACTOR IN REIMBURSEMENTS ALREADY MADE.

I. Factory management must conduct a documented review re:

- a) enhancing current recruitment and hiring system, addressing all areas for improvement on this CAP, as well as to further review and help make a determination on any additional repayment amounts to aligned with industry best practices, and that recruitment and hiring practices conform with internationally recognized standards.
- b) meet their legal obligations, compliance with the Under Armour, and Fair Labor Association's Codes and Benchmarks.

II. Conduct regular, on-going monitoring of any and all agents used during recruitment to verify agents' compliance to all of the facility's ethical recruitment requirements, as described in formal agreements. Any non-compliance found during monitoring should be followed by an established corrective action procedure to track remediation progress.

III. Monitoring of the recruitment process should include a grievance mechanism for applicants to use during recruitment to report

any unethical treatment. The grievance mechanism should be in workers' languages, confidential, and protect workers from retaliation for information provided.

IV. Monitoring activities should also include interviews of a representative sample of newly-arrived migrant workers from each sending country to verify the following:

- o Workers did not pay recruitment fees or expenses in conjunction with their recruitment and hiring that exceed legal or company limits;
- o Workers were not recruited through any agents other than those with which the facility cooperates;
- o Workers were provided, signed, and retained a written contract of employment in keeping with customer and legal requirements on contracts of employment;
- o Workers did not experience any form of deception or coercion during recruitment and hiring;
- o Workers did not experience any discrimination or unwarranted document retention.

V. Interviews should be confidential, and workers should be protected from retaliation for information provided during the interviews.

Please submit to us all relevant supporting documentation for our review."

Planned completion date

12/10/18

## FINDING NO.4

### IMMEDIATE ACTION REQUIRED

#### FINDING TYPE: Hours of Work

##### Finding Explanation

1. The factory's total daily working hours (regular plus overtime hours) exceeded the daily limit of 10 hours in January, March, April, May, June, July, August, and September 2018. Out of a sample of 52 workers, 44 workers' hours exceeded the legal limit in all five months, with a maximum of 13 hours of work in a single day. [HOW.1, HOW.8]

2. The factory's total weekly working hours (regular plus overtime hours) exceeded the weekly limit of 60 hours in January, March, April, May, June, July, August, and September 2018. Out of a sample of 52 workers, 47 workers' hours exceeded the legal limit in all five months, with a maximum of 74 hours of work in a single week. [HOW.1, HOW.8]

3. Out of a sample of 52 workers, 25 workers did not receive 24 consecutive hours of rest in a seven-day period in July 2018, resulting in 12 consecutive days of work. [HOW.1, HOW.2]

4. The factory's working hours records do not identify pregnant and breastfeeding in order to ensure that they receive all legally required protections. [HOW.5]

5. The factory does not provide breastfeeding workers with a one-hour break to breastfeed each day as legally required. [ER.14, HOW.1, HOW.4, ND.1, ND.8]

6. The factory's production plan includes overtime. [HOW.8]

##### Local Law or Code Requirement

Jordanian Labour Law No: 8 1996, Articles 56, 57, 59, 60 and 71; Minister of Labour Decision in respect to Activities and Time During Which it is Prohibited to Employ Women, 2010; FLA Workplace Code (Employment Relationship Benchmark ER.14; Hours of Work Benchmarks HOW.1, HOW.2, HOW.4, HOW.5, and HOW.8; Non-Discrimination Benchmarks ND.1 and ND.8)

##### Recommendations for Immediate Action

1. Ensure that daily working hours do not exceed the legal limit of 10 hours.
2. Ensure that weekly working hours do not exceed the FLA limit of 60 hours.
3. Provide all workers at least one day off in every seven-day period.
4. Provide all breastfeeding workers with a one-hour break each day as legally required so that they can breastfeed.

### COMPANY ACTION PLANS

Action Plan no 1.



### Description

"Immediate Actions Required:

1. Ensure that daily working hours do not exceed the legal limit of 10 hours.
2. Ensure that weekly working hours do not exceed the FLA limit of 60 hours.
3. Provide all workers at least one day off in every seven-day period.
4. Provide all breastfeeding workers with a one-hour break each day as legally required so that they can breastfeed."

Planned completion date

12/10/18

## Action Plan no 2.

### Description

"Sustainable Improvements Required:

I. The factory must identify the top and middle management personnel who will: 1) conduct documented and regular (daily, weekly and monthly) documented and regular analyses of the factory's hours of work with a view to progressively reducing excessive hours of work; 2) demonstrate and issue a written commitment to reduce overtime and 3) alter its personnel practices to make a documented effort to maintain a level of staffing that is reasonable in view of predictable or continuing fluctuations in business demand. Factory management is to: address its excessive hours issues:

- 1) if established to be necessary, by jointly working with its customers on how to provide better order forecasts;
- 2) Participating in workshops/engaging a consultancy for the factory on how to improve productivity/quality;
- 3) if established to be necessary, by jointly working with its customers to develop clear guidelines on how to extend shipment deadlines in case of contingencies;
- 4) the creation of steps that management must follow if overtime is inevitable (steps for how to communicate with Under Armour's Sourcing and Sustainability teams and other customers);
- 5) clear guidelines on calculating and setting reasonable production targets that will not demand work beyond regular working hours or during breaks; and
- 6) Developing clear guidelines on how and when the factory can use subcontractors (no Subcontractors may be used without meeting the requirements in the MAP's final row, below) and/or temporary workers to avoid excessive overtime.
- 7) re-evaluate the production planning systems and controls in order to ensure that they match their historically demonstrated production capacity in order to operate within its working hour control policy.

Please send us supporting documentation for each of the items above, including a commitment letter, and a copy of the documented analysis.

II. Going forward, the factory must permit workers to take off from work and rest on the paid leave days to which they are entitled. The factory should consider retroactively providing to all workers who worked on a past rest day with an alternative and actual rest day in the coming weeks/months and consistent with local regulations.

The factory must also identify the person that will ensure that:

- 1) The factory shall comply with all applicable laws, regulations and procedures governing the payment of premium rates for work on holidays, rest days, and overtime, including paying the legally defined premium rates for overtime and work on holidays or rest days;
- 2) Update/enhance compensation/benefits policy and procedure in line with local law requirements; including specific references about OT payment and their appropriate rate. Train supervisors and other managerial positions about the revised policy and procedures. Communicate through different means to workers in their local language and/or dialects about the revised policy and procedures.

Please send to us supporting documentation for each of the action items identified above.

Planned completion date

12/10/18

## Action Plan no 3.

### Description

III. The facility shall identify the manager who will be responsible for ensuring that implementation of all listed requirements is completed in a timely and effective manner, and that evidence of the implementation is provided to the Under Armour Sustainability Team. This manager must ensure that at a minimum: The facility abides by all protective provisions in national laws and regulations benefitting pregnant workers and new mothers, including:

- Provisions concerning maternity leave and other benefits;
- Prohibitions regarding night work, temporary reassignments away from work stations and unsafe work environments;
- Temporary adjustment of working hours during and after pregnancy; and
- The provision of breast-feeding breaks and facilities.

Where such legal protective provisions are lacking, the facility takes reasonable measures to ensure the safety and health of pregnant women and their unborn children. Such measures are taken in a manner that does not unreasonably affect the employment status, including compensation of pregnant women.

## FINDING NO.5

### SUSTAINABLE IMPROVEMENT REQUIRED

#### FINDING TYPE: Termination & Retrenchment

##### Finding Explanation

1. One of the three sampled resigned migrant workers returned to her country of origin on July 31, 2018 even though her visa expired on June 18, 2018. [ER.1]
2. The final settlement documents are in Arabic and English, not in the language(s) spoken by workers.. [ER.1, ER.32]
3. The factory doesn't arrange consultation meetings with workers or worker/union representatives before management reaches final decisions on layoffs. [ER.32]

##### Local Law or Code Requirement

Jordanian Labour Law No: 8, 1996 Articles 2, 4, 6, 11, and 12; FLA Workplace Code (Employment Relationship Benchmarks ER.1 and ER.32)

### COMPANY ACTION PLANS

#### Action Plan no 1.

##### Description

"Factory management to identify to us the person/team who/that will ensure to:

1. Review, or update policies and procedures (SOPs) to ensure migrant workers comply with local regulations and do not overstay their visas and assist/help obtain, to extent as possible, migrant worker visas on a timely basis. This should include a staff member checking periodically on visa expiration dates, as well as training for supervisors and workers on complying with local government laws on visas. Please send to us your plan and implementation timetable.
2. Have final settlement documents available in the workers' spoken languages.
3. Develop a procedure that in cases of layoffs and retrenchment, management will consider to have consultation meetings with workers, union representatives (if applicable) before reaching final decisions.

Please send to us your plan and implementation time table."

##### Planned completion date

12/10/18

## FINDING NO.6

### IMMEDIATE ACTION REQUIRED

#### FINDING TYPE: Workplace Conduct & Discipline

##### Finding Explanation

1. The factory conducts body searches whenever workers leave the factory. [H/A.10]
2. The disciplinary action forms that workers sign are in English. In addition, they lack details about the incident(s) that led to the disciplinary action. [ER.2, ER.27]
3. The factory's Workplace Conduct & Discipline procedures do not include a requirement to record all warnings and disciplinary actions. [ER.1, ER.27]
4. Disciplinary actions are not witnessed by a third party during imposition. [ER.27]



#### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.2, and ER.27; Harassment or Abuse Benchmark H/A.10)

#### Recommendations for Immediate Action

1. Stop conducting regular body searches. Only search workers when there is a legitimate reason to do so and with the workers' consent.

### COMPANY ACTION PLANS

#### Action Plan no 1.

##### Description

"Factory management to identify to us the manager/team who/that will ensure:

1. body searches have stopped, and only carried out when there is a legitimate reason to do so and with the workers' consent;
2. Disciplinary forms are available in the languages spoken by workers, and ensure forms have, or include, details about the incident(s) that led to the disciplinary action(s).
4. there is 3rd party witness during a disciplinary action imposition, in accordance with Under Armour/FLA Benchmarks.

Please send the corresponding supporting documentation. "

##### Planned completion date

12/10/18

#### Action Plan no 2.

##### Description

"The factory must identify the manager/team who/that will be responsible for creating, in collaboration with an experienced, third party capacity building firm, an SOP on security practices, including body searches and pat downs in accordance to FLA benchmarks and local law regulations. This should include:

- 1) Safeguards that protect the workers' dignity and rights during the search, such as: a) gender appropriate searches, b) making the searches and pat down non intrusive, c) obtaining workers' consent to the pat downs/body searches, d) conducting the searches and pat downs in a private location, and e) ensuring that there is a legitimate reason to conduct the security practices.
- 2) A description of complaint/grievance channels/mechanisms so that workers can express concerns and/or complaints related to the security practices (body searches and pat downs).
- 3) Enhance/update Disciplinary system to include: a) non-compliance security practices as violations to the internal regulations; b) further investigation of allegation concerning non-compliance security practices; and c) procedure for filing such disciplinary practices.

The factory must then communicate the SOP to the workers by:

- 1) Posting the SOP in prominent areas throughout the factory;
- 2) Considering using the PA system to advise workers about the SOP;
- 3) Updating the new hire orientation materials to inform new workers of the SOP;
- 4) Conducting training to all workers on the new SOP.

The factory must ensure that managerial and supervisory and security guard positions receive training about:

- A) Appropriate methods of conducting security practices;
- B) Constructive/positive management techniques and training on the factory's anti-harassment policies and procedures and related disciplinary policy and procedures for violations of the anti-harassment and abuse policies;
- C) Self-esteem, labor rights (coexistence rules, employer rights and obligations), strategic/empowered leadership, and team work;
- D) Review harassment or abuse policy and procedures implementation, identify shortcomings and recommend adjustments or revisions needed.

Please send us supporting documentation that the above has happened, such as attendance sheets and photos for training. "

##### Planned completion date

12/10/18

### FINDING NO.7

### SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Grievance System

#### Finding Explanation

1. The suggestion boxes are located at the entrances to the production areas instead of in places that will ensure confidentiality, such as restrooms or locker rooms.

#### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.25)

### COMPANY ACTION PLANS

#### Action Plan no 1.

##### Description

Factory management to identify to us the manager/team who/that will ensure that suggestion boxes are relocated in areas in which workers may use them in confidence, such as locker rooms, bathrooms, etc.

##### Planned completion date

12/10/18

#### Action Plan no 2.

##### Description

"Sustainable Improvements Required:

The facility shall identify the manager who will be responsible for ensuring that implementation of all listed requirements is completed in a timely and effective manner, and that evidence of the implementation is provided to the Under Armour Sustainability Team. This manager must ensure that at a minimum: The facility has a clear and transparent system of worker and management communication that enables workers to consult with and provide input to management. This might include suggestion boxes, workers committees, designated spaces for worker meetings, and meetings between management and workers' representatives. "

##### Planned completion date

12/10/18

### FINDING NO.8

### IMMEDIATE ACTION REQUIRED

### FINDING TYPE: Health & Safety

#### Finding Explanation

1. The fire alarm for the top floor was not connected to the centralized fire alarm system. The factory provided a centralized alarm system during the assessment. [HSE.1, HSE.5]
2. The emergency exit door in the storage department was locked. The designated worker was called to unlock the door. The lock was removed and the door was kept open during the rest of the assessment. [HSE.5]
3. Two emergency exit doors open into the loading area and there are stairs for evacuation on the left side of the loading platform. The handrail for the stairs does not reach the entire length of the staircase, which poses a fall risk. There is no chain for the loading platform to prevent falls when the platform is not in use. [HSE.1, HSE.5]
4. There is no emergency exit sign or emergency light above the emergency exit door in the warehouse. [HSE.1, HSE.5]
5. One of the exit doors that leads to the main emergency exit in the warehouse is stuck and does not open easily. [HSE.5]
6. At the time of the assessment there was a waste collection truck parked in front of the emergency exits on one side of the factory. [HSE.1, HSE.5]
7. Some of the fire extinguishers were in plastic bags that prevented easy access. The plastic bags were removed during the assessment. [HSE.6]
8. The factory has not assigned emergency assembly areas for the dormitories. [HSE.5, HSE.25]
9. There are no signs in one of the dormitories (the Union Building) that lead to the main exit through the evacuation route outside of

the building. [HSE.5, HSE.25]

10. There is no emergency exit sign above one of the emergency exit doors in one of the dormitories (the Union Building) [HSE.5, HSE.25]

11. The handrail on the platform in front of the emergency exit in one of the dormitories (the Union Building) does not surround the entire platform. This poses a fall risk. [HSE.5, HSE.25]

12. One of the emergency exit doors in the childcare area does not open in the direction of evacuation. [HSE.5]

13. The main back door of the childcare area is locked. [HSE.5]

14. Only one member of the childcare staff has been trained and assigned responsibility for fire safety. She was not in the childcare area during the assessment. [HSE.5]

#### Local Law or Code Requirement

Jordanian Labour Law No: 8 1996, Articles 78 and 80; FLA Workplace Code (Health, Safety & Environmental Benchmarks HSE.1, HSE.5, HSE.6, and HSE.25]

#### Recommendations for Immediate Action

1. Provide a centralized fire alarm in the factory building.

2. Ensure that all emergency exits are unlocked during working hours.

3. Ensure that emergency exits are designed to be safe for emergency evacuation and do not pose a fall risk. Install a handrail for the stairs to the left of the loading platform that covers the entire staircase. Provide a chain for the loading platform.

4. Install an emergency exit sign and emergency light for the exit door in the warehouse.

5. Ensure that all exit doors, including the door leading to the main emergency exit in the warehouse, open easily.

6. Do not allow waste collection trucks to park in front of the emergency exits.

7. Remove the plastic bags from all fire extinguishers.

8. Assign emergency assembly areas for the dormitories.

9. Post signs in the Union Building that indicate the evacuation route.

10. Install an emergency exit sign above the emergency exit door in the Union Building.

11. Install a handrail for the platform in front of the emergency exit door in the Union Building that surrounds the entire platform.

12. Ensure that all emergency exit doors, including those in the childcare area, open outwards.

13. Keep the doors to the childcare area unlocked.

14. Train an additional member of the childcare staff on fire safety. Ensure that someone trained on fire safety is present in the childcare area at all times.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

"Factory management to identify to us the manager/team who/that will ensure to:

1. Install an approved, certified, centralized fire alarm which must be connected to the top floor.

2. Ensure that all emergency exits are unlocked during working hours.

3. Ensure that emergency exits are designed to be safe for emergency evacuation and do not pose a fall risk. Install a handrail for the stairs to the left of the loading platform that covers the entire staircase. Provide a chain for the loading platform.

4. Install an emergency exit sign and emergency light for the exit door in the warehouse.

5. Ensure that all exit doors, including the door leading to the main emergency exit in the warehouse, open easily.

6. Do not allow waste collection trucks to park in front of the emergency exits.

7. Remove the plastic bags from all fire extinguishers.

8. Assign emergency assembly areas for the dormitories.

9. Post signs in the Union Building that indicate the evacuation route.
10. Install an emergency exit sign above the emergency exit door in the Union Building.
11. Install a handrail for the platform in front of the emergency exit door in the Union Building that surrounds the entire platform.
12. Ensure that all emergency exit doors, including those in the childcare area, open outwards.
13. Keep the doors to the childcare area unlocked.
14. Train an additional member of the childcare staff on fire safety. Ensure that someone trained on fire safety is present in the childcare area at all times.

Please send to us your plan, timetable and the corresponding supporting documentation for our review."

Planned completion date

12/10/18

## Action Plan no 2.

### Description

"Sustainable Improvements Required:

I. The factory to identify to us the manager/ team who/that will, according to a new documented maintenance schedule and work plan, be responsible for regularly: a) inspecting, b) maintaining, and c) replacing as necessary all health and safety equipment, including fire extinguishers, first aid kits, showers, eye-wash stations, and fire alarm control panels. This person/ team should also 1) conduct documented training for the workers on how to use the equipment and 2) post posters and photographs showing the workers how to properly use them and showing them incorrect/improper/unacceptable usage.

Please send us copy of inspection logs.

II. The facility shall identify the manager who will be responsible for ensuring that implementation of all listed requirements is completed in a timely and effective manner, and that evidence of the implementation is provided to the Under Armour Sustainability Team. This manager must ensure that at a minimum: Dormitory facilities meet all applicable laws and regulations related to health, safety, and environment, including fire safety, sanitation, risk protection and electrical, mechanical, and structural safety. All dormitories are kept secure, clean, and have safety provisions (e.g. fire extinguishers, first aid kits, unobstructed emergency exits, emergency lighting).

III. 1) Immediately schedule for thorough assessment of all factory buildings and layout to ensure safety ingress and egress for people in the premises during normal and emergency situation;  
 2) THE FACTORY MUST IDENTIFY THE TEAM OF PERSONNEL (IDENTIFY THE TEAM OF WORKERS AND MANAGERS) WHO WILL DRAFT AND EFFECTIVELY IMPLEMENT WRITTEN PROCEDURES CONTROLS (SUCH AS FREQUENT DAILY DOCUMENTED INSPECTIONS, WITH IDENTIFIED PERSONNEL (WORKERS (WHO ARE CONFIDENTIALLY ELECTED BY THEIR CO-WORKERS, AND WHO ALSO MEMBERS OF THE FACTORY'S FIRE AND HEALTH AND SAFETY COMMITTEES) AND MANAGERS ON EACH SHIFT AND IN EACH WORK AREA WHO ARE ASSIGNED THIS RESPONSIBILITY);  
 3) TO ENSURE AT ALL TIME TO KEEP CLEAR OF OBSTRUCTION OF BUILDING INGRESS AND EGRESS LAYOUT PLAN SUCH AS: a) EVACUATION PASSAGES; b) AISLES; c) EMERGENCY EXITS and d) STAIRS AND STAIRCASE LOBBIES ARE TO BE KEPT CLEAR FROM OBSTRUCTION BY TROLLEYS, SEMI COMPLETED PRODUCTS, BINS, AND ANY FORM OF OBJECT INCLUDING BY IMPLEMENTING SYSTEMS AND CONTROLS SUCH AS FREQUENT DAILY DOCUMENTED INSPECTIONS IN ORDER TO COMPLY WITH APPLICABLE LAWS;  
 4) TO ENSURE AT ALL TIME THAT THE SEATING ARRANGEMENT OF WORKERS AT SEWING LINES ARE ALLOCATED IN THE BOUNDARY AND KEEP CLEAR OF: A) EVACUATION PASSAGES; B) AISLES AND C) EXITS.  
 5) TO ENSURE THAT FROM NOW ON NO EMERGENCY EXITS, FIRE HYDRANTS, FIRE EXTINGUISHERS, FIRE-FIGHTING AND EMERGENCY EQUIPMENT, ELECTRICITY CONNECTION BOXES/ELECTRICAL PANELS AND THE AREAS IN FRONT OF ALL SUCH EXITS, AISLES, BOXES PANELS AND EQUIPMENT ARE BLOCKED (EVEN PARTIALLY) INCLUDING BY IMPLEMENTING SYSTEMS AND CONTROLS SUCH AS FREQUENT DAILY DOCUMENTED INSPECTIONS IN ORDER TO COMPLY WITH APPLICABLE LAWS (see above example);  
 6) ensure that from now on and at all times all EMERGENCY EXITS must be unobstructed with any form of object and production materials;  
 7) ensure there must be written directives and procedures ensuring continuous control and availability of access to at least two marked, clear, lighted, unobstructed, unlocked emergency evacuation routes from every workstation to, through and outside of the building to an external posted area of safety outside of the building (External Assembly Point (EAP) should be established;

Please send to us photographs of unobstructed aisles/walkways and exits."

Planned completion date

12/10/18

## FINDING NO.9

IMMEDIATE ACTION REQUIRED

## FINDING TYPE: Health & Safety

### Finding Explanation

1. One of the chemicals used in the factory is labeled in Chinese. [HSE.9]
2. The factory does not have Material Safety Data Sheets (MSDS) for silicone or the chemical which is labelled in Chinese. [HSE.2, HSE.10]
3. The MSDS for the thinner does not include a Chemical Abstract Service (CAS) code or the 16 sections of required details. [HSE.2, HSE.10]

### Local Law or Code Requirement

Regulation No 43 of 1998 on Protection and Safety from equipment Industrial Machines and Job Sites; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.2, HSE.9, and HSE.10)

### Recommendations for Immediate Action

1. Label all chemicals in the local language.
2. Obtain and make available the MSDS for all chemicals, including silicone and the chemical labelled in Chinese.
3. Ensure that the thinner MSDS includes a CAS code and all required details.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

"Factory management to identify to us the manager/team who/that will ensure to:

1. Label all chemicals in the local language, and the language spoken by workers.
2. Obtain and make available the MSDS for all chemicals, including silicone and the chemical labelled in Chinese.
3. Ensure that the thinner MSDS includes a CAS code and all required details.

Please submit the corresponding supporting documentation."

#### Planned completion date

12/11/18

### Action Plan no 2.

#### Description

"Sustainable Improvements Required:

I. The factory must identify the person who will be responsible for drafting and effectively implementing the proper policy and procedures in a documented manner for ensuring: 1) MSDS for all chemicals and hazardous substances used in the workplace are available (Posted in the local language and contained in folders) at the usage and storage sites of the chemicals and hazardous substances, in English, the local language, and the language spoken by workers, if different from the local language. 2) That documented trainings are conducted on proper handling and storage of chemicals for all personnel, within the next 30 days. Relevant employees that receive training shall sign that they completed the training, and signed sheet shall be placed for reference into employee folder. This information should be available upon request. Photocopies of training attendees and materials shall be placed into column N, or sent to us along with, this document.

II. The factory must identify the person/team who/that will personally place safety labels in English and the local language and with all required language and pictograms on them on all containers and ensure that all chemical containers are labeled consistent with MSDS requirements, including (1) original containers from the manufacturers and 2) any smaller or different containers (which only may be used if they meet safety standards), and identify the manager who will draft, issue, publish copies of/summary posters of and conduct documented training about the formal new written policies and procedures for the use and labeling of chemical containers.

Please send us photographs showing that all of the above mentioned containers now have the required labels on them."

#### Planned completion date

12/11/18

## IMMEDIATE ACTION REQUIRED

### FINDING TYPE: Health & Safety

#### Finding Explanation

1. The steel gloves provided to the cutting operators do not fit the workers' hands. The factory replaced the steel gloves with gloves in workers' sizes during the assessment. [HSE.1, HSE.7]
2. The factory does not implement a lockout-tagout (LOTO) system by locking out equipment when needed. [HSE.13, HSE.14]
3. There is no lightning protection system in the factory. [HSE.13]
4. The grinding machine guard has been pushed back and is not used by the workers. [HSE.14]
5. The chairs provided to seated workers are not adjustable. [HSE.17]

#### Local Law or Code Requirement

Jordanian Labour Law No. 8 1996, Article 78; 1998 Instructions for Protection of Workers and Establishments from Workplace Hazards; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.7, HSE.13, HSE.14, and HSE.17)

#### Recommendations for Immediate Action

1. Provide workers with PPE in the correct size.
2. Implement a LOTO system.
3. Install a lightning protection system.
4. Position the grinding machine guard correctly and train workers on the proper use of machine guards. Monitor to ensure compliance.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

"Factory management to identify to us the manager/team who/that will ensure to:

1. Provide workers with PPE in the correct size.
2. Implement a LOTO system.
3. Install a lightning protection system.
4. Position the grinding machine guard correctly and train workers on the proper use of machine guards. Monitor to ensure compliance.

Please send to us the corresponding supporting documentation."

#### Planned completion date

12/11/18

### Action Plan no 2.

#### Description

"Sustainable Improvements Required:

I. The factory must identify the person who will: 1) ensure, by implementing a documented personal protective equipment ("PPE") use incentive/award/reward system, that its workers: a) are provided the appropriate PPE; e.g. anti-dust respirator, etc. and b) properly wear/use the PPE including earplugs and facemasks required by their specific workplace conditions; 2) conduct documented training session forcefully emphasizing risks and harms of failing to wear/properly use, PPE and 3) post posters, written in the language(s) understood by its workers and managers, in each workplace showing the necessary and proper use of PPE for each worker (also please refer to local regulations, if applicable). The factory must send to us photographs to us showing that/documented evidence that workers are provided/use the appropriate PPE.

II. Consider engaging an expert on ergonomics that would assist in: 1) implementing a formal written ergonomics program, based on results of point above, implement recommendations from the experts, which may include: a) adapting of work equipment- e.g., chairs based workers' height; b) daily exercises or breaks that are conducted according to a written schedule and are aimed at decreasing the effects of repetitive movements; c) purchasing and install in groups and over time ergonomically designed chairs with back supports and d) anti-fatigue mats for workers who stand when they work, to name a few of the features to include in a preventive occupational hazards program, 2) documentation of each of these processes should be maintained on file, and

whenever applicable, with worker's and trainer's signatures, and 3) conduct ergonomic training for related employees.

Please send us ergo program for review once available, and supporting documentation for training, such as attendance sheets and photos. "

Planned completion date  
12/11/18

## FINDING NO.11

### IMMEDIATE ACTION REQUIRED

#### FINDING TYPE: Health & Safety

##### Finding Explanation

1. There are no gas detectors or fire extinguishers in the dormitory kitchens. [HSE.6, HSE.25]
2. The garden area outside one of the male dormitories (the Union Building) is littered with garbage, cartons, and plastic bags. [HSE.19, HSE.25]
3. The ceiling in the restroom in one of the the male dormitories (the Union Building) is damaged, and there is a piece of rebar hanging from the ceiling which could fall and hurt somebody. [HSE.25]
4. The restroom in one of the male dormitories (the Union Building) is not clean. In addition, the toilets do not have flushing mechanisms. and do not have flushes. [HSE.19, HSE.20, HSE.25]
5. There are no washing machines in the dormitories, as legally required. Workers have to hand wash their laundry in the restrooms. [HSE.1, HSE.25]
6. There are no cabinets or refrigerators for food storage in the dormitory kitchens. [HSE.1, HSE.25]

##### Local Law or Code Requirement

Instruction No. 1 of 2011 for Prevention of Health Hazards Resulting from Housing Units of Labor Camps; FLA Workplace Code (Health, Safety, & Environment Benchmarks HSE.1, HSE.6, HSE.19, HSE.20, and HSE.25)

##### Recommendations for Immediate Action

1. Install gas detectors and fire extinguishers in all of the dormitory kitchens.
2. Remove all waste from the dormitory garden. Monitor to ensure that it remains clean.
3. Repair the ceiling in the male dormitory restroom.
4. Regularly clean the restrooms. Install flushing mechanisms for all of the toilets.

### COMPANY ACTION PLANS

#### Action Plan no 1.

##### Description

"Factory management to identify to us the manager/team who/that will ensure to:

1. Install gas detectors and fire extinguishers in all of the dormitory kitchens, and/or food preparation areas near or in dorms.
2. Remove all waste from the dormitory garden. Monitor to ensure that it remains clean.
3. Repair the ceiling in the male dormitory restroom.
4. Regularly clean the restrooms. Install flushing mechanisms for all of the toilets.

Please send to us the corresponding supporting documentation."

Planned completion date  
12/11/18

#### Action Plan no 2.



#### Description

"Sustainable Improvements Required:

I. The facility shall identify the manager who will be responsible for ensuring that implementation of all listed requirements is completed in a timely and effective manner, and that evidence of the implementation is provided to the Under Armour Sustainability Team. This manager must ensure that at a minimum: Dormitory facilities meet all applicable laws and regulations related to health, safety, and environment, including fire safety, sanitation, risk protection and electrical, mechanical, and structural safety. All dormitories are kept secure, clean, and have safety provisions (e.g. fire extinguishers, first aid kits, unobstructed emergency exits, emergency lighting).

II. The facility shall identify the manager who will be responsible for ensuring that implementation of all listed requirements is completed in a timely and effective manner, and that evidence of the implementation is provided to the Under Armour Sustainability Team. This manager must ensure that at a minimum: All accommodation provided by the facility to migrant workers is safe, clean and hygienic, with potable and running water, adequate sanitary facilities, as well as temperature-control equipment where necessary. Workers have adequate personal space and some privacy, and buildings meet all laws concerning multiple occupancy dwelling and local building regulations.

III. The factory must identify top manager who will:

1. Create and effectively implement procedures for Risk Assessments;
2. Facilitate communication with and active participation from workers on the development of the policies and procedures, and develop a mechanism for workers to express their views and opinions on Risk Assessment procedures;
3. Facilitate ongoing evaluations and revisions of policies and procedures;
4. Provide continuous training for all workers, supervisors, and managerial staff on the new policies and procedures;
5. Include information on the new Risk Assessment procedures during worker orientation or induction process;
6. Designate staff with the responsibility for policy/procedure enforcement and implementation; and
7. Provide workers with documents detailing the information that is covered during the orientation or induction process.

Please send us a copy of the new Risk Assessment procedures and other supporting documentation for the training, such as attendance sheets."

#### Planned completion date

12/11/18

## FINDING NO.12

### SUSTAINABLE IMPROVEMENT REQUIRED

#### FINDING TYPE: Review Process (Macro)

#### Finding Explanation

1. The factory does not regularly review its policies and procedures on any of the Employment Functions. [ER.1, ER.29, ER.30, ER.31]

#### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.1, ER.29, ER.30, and ER.31)

### COMPANY ACTION PLANS

#### Action Plan no 1.

#### Description

"Sustainable Improvements Required:

I. The factory must identify the management person/team who/that: 1) will implement a formal (according to a written plan and schedule) regular, consultative and documented review process of policies, procedures and 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; 2) 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.

Additionally, this manager/team must ensure that there is ongoing training for Termination and Retrenchment practices, as well as senior management approval.

Please send to us the review process plan and procedures for review.  
Please send us supporting documentation for training, such as attendance sheets and photos."

Planned completion date  
12/11/18

## FINDING NO.13

### SUSTAINABLE IMPROVEMENT REQUIRED

#### FINDING TYPE: Environmental Protection

##### Finding Explanation

1. The factory's Environmental Protection procedures do not include the following components:
  - a. Steps for workers to raise environmental concerns;
  - b. Protection against retaliation for workers who allege environmental violations. [ER.1, ER.31]

##### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1 and ER.31)

### COMPANY ACTION PLANS

#### Action Plan no 1.

##### Description

"Sustainable Improvements Required:

I. The factory must identify to us the manager and team who will from now on be responsible for: 1) facilitating Management's communication and consultation with, and active participation, by workers in the development of the policies and procedures, and develop a mechanism for workers to express their views and opinions on Environmental Protection; 2) facilitating ongoing evaluations and revisions of policies and procedures; 3) providing continuous training for all workers, supervisors, and managerial staff on the new policies and procedures; 4) including information on the new Environmental Protection policies and procedures during worker orientation or induction process; 5) designating staff with the responsibility for policy/procedure enforcement and implementation; 6) The factory must post the Environmental Protection policy in a) English and b) the local language throughout the factory in highly visible and readily accessible locations throughout the factory; 7) The factory must develop, publish, conduct documented training about and post, full and summary versions of, policies and procedures related to Environmental Protection in a) English and b) the local language, for all workers, including regular employees and supervisors.

Please send us supporting documentation for the ongoing training, such as a schedule for training, attendance sheets, and photos.

II. The factory must identify the person who will develop and effectively implement comprehensive written grievance: 1) policies and 2) procedures. The grievance procedures must include: 1) a means by which its workers can directly and confidentially report grievances to top management/human resource personnel (for example, by sending text messages to a dedicated H.R. Supervisor's telephone number; an email message to a dedicated H.R. Department email address; making telephone calls to a dedicated H.R. Department hotline or telephone number) without the knowledge of or involvement by supervisors and free from reprisal, retribution and retaliation, and 2) a grievance register (see attached example), in substance reflecting the date and nature of the grievance and the action taken, among other things. Please also confirm that top management will regularly and confidentially meet with employees without supervisors being involved or present. The factory should conduct documented training, and with materials, in the official local language and any other applicable dialects and languages, with its managers, Human Resources personnel and workers about each of the policies and procedures. The factory should document actions it subsequently takes in accordance with, and pursuant to these policies and procedures in any affected managers' and workers' on site personnel files.

Please send us supporting documentation for communication, such as attendance sheets, training material, photos of notices posted throughout the factory, etc."

## FINDING NO.14

### SUSTAINABLE IMPROVEMENT REQUIRED

## FINDING TYPE: Industrial Relations

### Finding Explanation

1. Jordan's labor law only allows one union per industry. This conflicts with FLA's Workplace Code regarding workers' right to establish and to join organizations of their own choosing.

2. There two types of representation system in the factories In Jordan. In case there is a union in the factory, union representative system and PICC (Performance Improvement Consultative Committees) which established to improve the dialogue between workers(including migrant workers) and managers and compliance in the factory. In this factory PICC members or representatives are not elected by workers, however assigned by the union. Union representatives and PICC members are the same workers. Although union representatives can be assigned by the union according to regulations , it is suggested to make an election for PICC members in the factory.

### Local Law or Code Requirement

FLA Code of Conduct (Freedom of Association Benchmarks FOA.2)

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

"Management to send to us, with the Company's letterhead, a written commitment to: a) the principle of freedom of association and the right to bargain collectively, as expressed in the Under Armour and FLA Codes and benchmarks and relevant ILO conventions; b) transparency so that all workers employed by the factory have sufficient information to understand and exercise their rights; c) refrain from and not tolerate any acts of discrimination, intimidation, reprisal or threats of reprisal against workers for exercising their associational and collective bargaining rights; and d) respect the right of worker representatives to freely carry out their functions.

Ensure that all workers, local and migrant, receive verbal and written communication about the factory's commitment to ensure the right to join or form a union or other worker organization of their own choosing without any management's interference."

#### Planned completion date

01/15/19

### Action Plan no 2.

#### Description

"1) It will immediately conduct documented educational and orientation meetings, for all members of Workers Representatives PICC Committee and workers in general, as about the factory's commitment to respect their freedom of association rights under the FLA and Under Armour Codes and benchmarks; 2) ensuring PICC Committee Members are communicated about: a) Factory workplace rules, regulations, policies; b) Under Armour Code of Conduct; c) the Fair Labor Association's Workplace Code of Conduct (<http://www.fairlabor.org/our-work/labor-standards> and related benchmarks and all applicable laws; 3) to have a clear and transparent system of PICC Committee, workers and management communication that enable workers to consult with and provide input to management through the use of: a) suggestion boxes; b) PICC; c) designated meeting rooms and spaces for PICC Committee and worker meetings, and d) meetings between management and PICC Committee.

4) Management to develop and implement an Industrial Relations policy and procedures based on Under Armour and FLA Workplace Code and Benchmarks that: a) include a commitment to freedom of association and b) enable workers to consult with and provide input to management through the existing structures and mechanisms; and c) a commitment to ensure the prevention of discrimination, interference and anti-union violence.

- Train all workers and those in supervisory and managerial positions regularly on the newly created formal and written Industrial Relations policies and procedures. Include this training in the new hire orientation.
- Designate someone responsible of overseeing the proper implementation and enforcement of the Industrial Relations policy and procedures.

- The factory must identify the credentialed expert/3rd party firm who/that will: a) Draft; b) conduct documented education about; c) ensure the effective implementation of, and d) posting of summary posters in the languages spoken by local and migrant workers, of new formal written: i) Policies and ii) Procedures ensuring that no less than every three months documented dialogue occurs on site between the factory's i) Employees; ii) its Workers Representatives and PICC Committee and iii) Factory Top Management to carry out democratic regulation in/of the workplace;

- The factory must: 1) create and implement a dialogue meeting procedure; 2) create and complete a related work plan according to a yearly schedule that shows the dialogue meeting dates scheduled on a trimester basis; 3) Management meets with Workers' Representatives for the legally mandated dialogue meetings; 4) The minutes of the dialogue meeting must be recorded during the meeting be issued to the meeting participants for review and kept on file on site with the participant's names, titles, signatures, confirmation that they have review the minutes and that they truly, fully and accurately reflect the meetings and date signed and 5) copies of the signed, approved meeting minutes are posted in the factory in areas readily accessible and highly visible to all

workers.  
"

Planned completion date  
01/15/19