



FAIR LABOR
ASSOCIATION®

INDEPENDENT EXTERNAL ASSESSMENT REPORT



COMPANIES: The Northwest Company LLC.

COUNTRY: China

ASSESSMENT DATE: 12/20/18

ASSESSOR: Openview

PRODUCTS: Headwear

NUMBER OF WORKERS:

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

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

1. The factory has not hired any disabled workers, which is a violation of legal requirements that state at least 1.5% of the total workforce should be composed of disabled workers. Although the factory contributes to the Employment Security Fund in lieu of employing disabled workers as allowed under the local law, this practice carries the risk of discrimination based on FLA Workplace Code and Benchmarks. [ER.3.1]

2. The factory's Recruitment process poses a risk of discrimination. The job advertisement in the HR computer requires that applicants for single-needle sewing position should be between 18 and 40 years old and be male, which is consistent with the situation in the factory. [ND.1, ND.2.1]

3. The factory does not have any policies or procedures on Personnel Development; therefore, the factory does not have specific career paths or skill development plans for workers. [ER.1, ER.28.1, ER.29.1]

4. The factory does not have written policies or procedures outlining the process for performance reviews; therefore, the factory does not conduct regular performance reviews. [ER.1, ER.30.1]

5. There are no policies and procedures regarding Retrenchment. [ER.1, ER.32.1]

Local Law or Code Requirement

Labor Law of the People's Republic of China, Article 12; Regulations on the Employment of Persons with Disabilities, Articles 8; FLA Workplace Code (Employment Relationship Benchmark ER.3; Non-Discrimination Benchmarks ND.1 and ND.2)

Recommendations for Immediate Action

1. Remove gender and age requirements from the job advertisement.

COMPANY ACTION PLANS

Action Plan no 1.

Description

Number of employees does not match productivity and make recruitment plans

Company Action Plan Update

The company has made a recruitment plan

Action Plan no 2.

Description

Number of employees does not match productivity and make recruitment plans

Company Action Plan Update

The company has made a recruitment plan

FINDING NO.2

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Compensation

Finding Explanation

1. The factory is not providing sufficient social insurance coverage for the employees. There are total 158 employees including 16 retired but re-recruited and 21 newly recruited workers in the factory. In October 2018, 71 out of 121 eligible employees (59%) were covered by pension, work-related injury, unemployment, medical, and maternity insurance. The rest of the employees were provided with commercial accidental injury insurance that is valid from December 5, 2018 to December 4, 2019 and has a maximum benefit amount of CNY 500,000/ USD 72,464 per employee. [ER.22.1, C.1, C.10]
2. The contribution base of the five types of social insurances is not in line with legal requirements. The contribution is between CNY 2,387/ USD 346 to CNY 2,808/ USD 409 per month (local minimum requirement is CNY 2,387/ USD 346 per month) for work-related injury, medical, maternity, unemployment, and pension insurance, instead of based on an employee's average monthly wage of the last year (about 80% of employees' wage range is between CNY 3,800/ USD 551 to CNY 7,000/ USD 1,014 per month). [ER.22.1, C1, C.10]
3. The factory only provides Housing Provident Fund for 10 out of all 121 eligible employees (8%). [ER.22.1, C1, C.10]
4. The contribution base for Housing Provident Fund for 9 out of 10 employees is CNY 2,387/ USD 346 per month, instead of an average of the employee's monthly wage over the last year (about 80% of employees' wage range is between CNY 3,800/ USD 551 to CNY 7,000/ USD 1,014 per month). [ER.22.1, C1, C.10]

Local Law or Code Requirement

Labor Law of the People's Republic of China, Articles 72 and 73; Social Insurance Law of the People's Republic of China, Articles 12 and 58; Regulations on Management of Housing Provident Fund, Articles 3, 15 and 16; FLA Workplace Code (Employment Relationship Benchmark ER.22; Compensation Benchmarks C.1 and C.10)

Recommendations for Immediate Action

1. Provide all employees with all legally required social insurance.
2. Align the social insurance contribution base with worker's actual compensation.

COMPANY ACTION PLANS

Action Plan no 1.

Description

Wage scales need to be signed by employees

Company Action Plan Update

The payroll employee has signed

Action Plan no 2.

Description

Wage scales need to be signed by employees.

Company Action Plan Update

The payroll employee has signed

FINDING NO.3

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Compensation

Finding Explanation

1. According to the payroll records from November 2017 to October 2018, office staff and warehouse workers (about 25) are paid by monthly wage and the rest workers (about 130) are paid by piece-rate wage. There is no overtime premium payment for any workers. [ER.18, C.7.1, C.7.2, C.7.3]
2. The factory does not pay the legally require holiday premium for any of the sewing, cutting, inspection, and packing workers. Additionally, the factory does not pay the premium for work conducted on rest days. [ER.22.1, C.1, C.7.1]
3. According to the HR administrative handbook and worker interviews, the factory does not take workers' external seniority (previous job experience prior to factory employment) into account when calculating annual leave, as required by law. [ER.22.2]
4. The distributed pay statements do not have workers' written confirmation. [C.1, C.14.1]
5. Workers do not receive a pay slip when the employer pays their wages. [C.1, C.17.1]

Local Law or Code Requirement

Labor Law of the People's Republic of China, Articles 44 and 51; Regulations on Annual Leave for Employees, Article 2; Provisional Regulations for the Payment of Wages, Article 6; FLA Workplace Code (Employment Relationship Benchmarks ER.18 and ER.22; Compensation Benchmarks C.1, C.7, C.14, and C.17)

Recommendations for Immediate Action

1. Pay overtime wage for all workers as legally required.
2. Provide piece-rate workers with paid statutory holidays as required by national laws.
3. Calculate annual leave of all workers based on their cumulative working experience (working age).

COMPANY ACTION PLANS

Action Plan no 1.

Description

The company's provident fund shall be paid according to the actual salary

Company Action Plan Update

The company's provident fund shall be paid according to the actual salary

Action Plan no 2.

Description

The company's provident fund shall be paid according to the actual salary

Company Action Plan Update

The company's provident fund shall be paid according to the actual salary

FINDING NO.4

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Hours of Work

Finding Explanation

1. The factory production plan is based on a 63-hour work week. The factory management sets production targets, piece rates, and other incentives at a level such that workers need to work 23 overtime hours per week. [HOW.8.1].

2. Based on document review and interviews with workers and management, the factory does not conduct an analysis of regular working hours with the aim to progressively reduce excessive hours of work. [HOW.1.2].

3. Overtime occurs because there are not enough workers. [HOW.1.2, HOW.6]

1. According to the time records for the period from November 2017 to December 19, 2018 and worker interviews, the monthly overtime for 95% of workers exceeded the legal limit of 36 hours per month in all reviewed months except for February and March 2018, and about 10% of workers' monthly overtime is up to the maximum 218 hours in September 2018. [HOW.1.1, HOW.8.1]

2. According to the time records for the period from November 2017 to December 19, 2018 and worker interviews, the daily overtime for 70% of workers exceeded the legal limit of 3 hours on 5-15 weekdays per month in the reviewed period except for February and March 2018, and about 4% of workers' daily overtime is up to the maximum 8.5 hours on October 10, 2018. [HOW.1.1, HOW.8.1]

3. According to the time records for the period from November 2017 to December 19, 2018 and worker interviews, the weekly working hours for 90% of workers exceeded 60 hours for a duration of 1 to 4 weeks per month in all reviewed month except for February and March 2018, and about 3% of workers' weekly working hours range up to 88 hours in one week in October 2018. [HOW.1.3]

4. According to the time records for the period from November 2017 to December 19, 2018 and worker interviews, about 70% of workers do not regularly receive one day off in every seven-day period in all reviewed months except for February and March 2018, and about 20% of workers worked a maximum of 31 consecutive days from August 1 to 31, 2018. [HOW.1.1, HOW.2]

5. According to the time records for the period from November 2017 to December 19, 2018, all workers' attendance records are manual maintained with tick signs to indicate the attendance or the number of overtime hours like 4 hours overtime per day after normal shift ended, without the start and end time of a work shift. As result, it could not be verified if all the workers' working time are accurately calculated. [HOW.23.3]

Local Law or Code Requirement

Labor Law of the People's Republic of China, Articles 38 and 41; FLA Workplace Code (Hours of Work Benchmarks HOW.1, HOW.2, HOW.6, HOW.8, and HOW.23)

Recommendations for Immediate Action

1. Ensure overtime working hours do not exceed 3 hours per day and 36 hours per month.

2. Control workers' weekly working hours not exceed 60 hours.

3. Provide one day off in every seven-day period for workers.

4. Document workers' attendance accurately with detailed time in/out.

COMPANY ACTION PLANS

Action Plan no 1.

Description

Company overtime

Company Action Plan Update

Develop work hour improvement plans to ensure reasonable working hours

Action Plan no 2.

Description

Company overtime

Company Action Plan Update

Develop work hour improvement plans to ensure reasonable working hours

FINDING NO.5

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Industrial Relations

Finding Explanation

1. There are three worker representatives in the factory, however, two of them are members of the factory management. An election was held, but the only candidates were the two factory managers and a chosen worker representative.[FOA.1, FOA.10, FOA.11]

2. FLA Comments: The Chinese constitution guarantees Freedom of Association; however, the Trade Union Act prevents the establishment of trade unions independent of the sole official trade union – the All-China Federation of Trade Unions (ACFTU). According to the International Labor Organization (ILO), many provisions of the Trade Union Act are contrary to the fundamental principles of freedom of association, including the non-recognition of the right to strike. As a consequence, all factories in China fall short of the ILO standards on the right to organize and bargain collectively. Recently, however, the government has introduced new regulations that could improve the functioning of the labor relations' mechanisms. The Amended Trade Union Act of October 2001 stipulates that union committees have to be democratically elected at members' assemblies and trade unions must be accountable to their members. The trade union has the responsibility to consult with management on key issues of importance to their members and to sign collective agreements. It also grants the trade union an enhanced role in dispute resolution. In December 2003, the Collective Contracts Decree introduced the obligation for representative trade unions and employers to negotiate collective agreements, in contrast to the previous system of non-negotiated administrative agreements. [FOA.2]

Local Law or Code Requirement

FLA Workplace Code (Freedom of Association Benchmarks FOA.1, FOA.2, FOA.10, and FOA.11)

COMPANY ACTION PLANS

Action Plan no 1.

Description

The company establishes trade unions

Company Action Plan Update

The company has established trade unions and held meetings

Action Plan no 2.

Description

The company establishes trade unions

Company Action Plan Update

The company has established trade unions and held meetings

FINDING NO.6

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Workplace Conduct & Discipline

Finding Explanation

1. The disciplinary system does not include the workers' right to have a third-party witness present during imposition of the disciplinary action. [ER.27.4]
2. The disciplinary policy/procedure do not require workers to sign all written records of disciplinary action against them. Consequently, none of workers who violate factory rules sign the records of disciplinary action against them. [ER.27.3.3]
3. The records of disciplinary actions are maintained in a centralized file but not in workers' personnel files. [ER.27.3.4]
4. Workers do not receive a copy of the workplace rules or written documentation that substantiates all of the issues covered in orientation. [ER.15.3]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.15 and ER.27)

COMPANY ACTION PLANS

Action Plan no 1.

Description

The company establishes staff discipline

Company Action Plan Update

The company has instituted staff discipline

FINDING NO.7

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The factory does not annually test the lightning protection system. [HSE.13]
2. There are electrical wires hanging on the lights and on flammable materials at the warehouse and inspection area, which carries a high risk for fire and electrical safety. [HSE.13]
3. The confined space (elevator shaft) is not marked with signs. [HSE.14]
4. There is no rescue equipment, such as breathing apparatus, head lamp, communication tool or rope, available for confined spaces. [HSE.6.1]
5. The lockout-tagout procedure is not implemented properly. For example, there is no locking equipment available, and the electrician was not clear about how to implement this program. [HSE.14]

6. A large amount of combustible cotton material is stored beside one electric box in the material warehouse on the 1st floor and one electric box in sewing workshop on the 3rd floor of production building. [HSE.13]

Local Law or Code Requirement

Technical Specifications for Inspection of Lightning Protection System in Building, Article 6; Code of Acceptance of Construction Quality of Electrical Installation in Building, Article 5.1.12; Electricity Safety Guidelines, Article 5.2; FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.6, HSE.13, and HSE.14)

Recommendations for Immediate Action

1. Conduct annual inspection for the lightning protection system as per law.
2. Regularly check and maintain the electrical wires at the production lines and warehouse.
3. Equip rescue equipment such as breathing apparatus, head lamp, communication tool and rope for confined spaces.
4. Fully implement lockout-tagout equipment to ensure the safety of relevant workers.
5. Remove the combustible materials from the electrical box and keep all electric boxes free of obstruction.

COMPANY ACTION PLANS

Action Plan no 1.

Description

Evaluation of occupational hazards formulated by the company.

Porters need belts.

Company Action Plan Update

The company has formulated an assessment of occupational hazards.

Company porters are equipped with belts.

Action Plan no 2.

Description

1.Establishment of Rescue Facilities for Restricted Space Configuration2. Warehouse Temporary Electricity Code 3. Warning Signs Posted in Computer Room

Company Action Plan Update

1.The company has developed a limited space allocation related rescue facilities2. Warehouse Temporary Electricity Code 3. Warning Signs Posted in Computer Room

FINDING NO.8

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. There are a large number of finished products temporarily laid on the fire passage that may blocked the access of emergency vehicles in case of an emergency. [HSE.5.1]
2. The fire brigade does not have the appropriate personal protective equipment (PPE) to fight fires (such as breathing apparatus, head lamp, communication tool and safety helmet). [HSE.6.1]
3. The production building (construction year is 2015 and the land area is about 3,144.25 square meters) does not have sprinkler system. [HSE.5.1]
4. The factory does not provide the Catering License for review, while a kitchen is in operation. [HSE.4]
5. Based on the document review, the health certificates of two canteen employees, who are directly employed by the factory, are not in place for review. [HSE.22.2]

Local Law or Code Requirement

Code of Design on Building Fire Protection and Prevention, Article 8.3.1; Law of the People's Republic of China on Food Safety, Articles 29 and 34; Provisions on the Supervision and Administration of Occupational Health at Work Sites, Article 20; FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.4, HSE.5, HSE.6, and HSE.22)

Recommendations for Immediate Action

1. Remove the finished products and ensure the fire passage is clear at all time.
2. Provide appropriate personal protective equipment (PPE) for the fire brigade to fight fires.
3. Install sprinkler system for the production building.

COMPANY ACTION PLANS

Action Plan no 1.

Description

Kitchen workers wear hats and masks to work

The company formulates environmental, health and safety risk procedures to ensure that the life safety of whistleblowers is not attacked.

Company Action Plan Update

Kitchen workers wear hats and masks to work as required.

The company has developed and implemented risk procedures for environmental, health and safety to ensure that the life safety of whistleblowers is not undermined.

Action Plan no 2.

Description

1. Blockage of fire passages 2. Fire brigades do not have proper personal protective equipment 3. Restaurant permits for auditing and health certificates for two canteen employees are not reviewed.

Company Action Plan Update

1. The fire passage is unobstructed 2. The fire brigade is equipped with appropriate personal protective equipment 3. The canteen dining permit and the health certificate of two canteen employees have been processed.

FINDING NO.9

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The factory has not installed needle guards on two sewing machines in the sewing workshop. [HSE.14.1]
2. Individual workstations are not adjustable to fit workers. The factory does not take proactive steps to reduce repetitive-motion stress injuries, such as no seat backs. The factory does not provide anti-fatigue mats to standing workers or lifting belts to the relevant workers. [HSE.17]
3. The factory has not conducted the Test of Occupational Disease Hazard Factors as required under local law. [HSE.1]
4. One of the two safety exits in the sewing workshop on the 3rd floor of the production building is partially blocked by various materials. [HSE.5.1]
5. Two workstations in the sewing workshop are blocked by various materials. [HSE.5.1]
6. The traffic lanes and walking paths are not clearly marked. [HSE.5.1]

Local Law or Code Requirement

Code of Design of Manufacturing Equipment Safety and Hygiene, Article 6.1.6; Provisions on the Supervision and Administration of Occupational Health at Work Sites, Article 20; Fire Prevention Law of the People's Republic of China, Article 16 (4); FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.1, HSE.5, HSE.14, and HSE.17)

Recommendations for Immediate Action

1. Install needle guards for all sewing machines.
2. Provide lifting belts to all relevant workers, and train them on their use.
3. Conduct Test of Occupational Disease Hazard Factors once a year.
4. Make sure all safety exits are unblocked.
5. Keep all workstations free from any kind of obstruction.
6. Mark traffic lanes and walk paths clearly on the factory premises.

COMPANY ACTION PLANS

Action Plan no 1.

Description

The company applies for a catering license and arranges personnel to apply for a health certificate.

Company Action Plan Update

The company has applied for a catering license and handled a catering health certificate

Action Plan no 2.

Description

Two workstations in the worker's seat backrest and sewing workshop are blocked by various materials, and one part of the safety exit is blocked by various materials.

Company Action Plan Update

The company has provided back-to-back seats for workers. There is a passageway between the two workstations in the sewing workshop. The blockage of the safety exit has been cleared and maintained unobstructed.

FINDING NO.10

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. Two fire extinguishers in sewing section on the 3rd floor of production building are blocked by various materials. [HSE. 6.1]
2. The factory does not keep food samples in the canteen as required under local law. [HSE.1, HSE.22.1]
3. The factory does not track and conduct statistical analysis for workers' illnesses. [HSE.3.2]
4. The factory production buildings were completed in 2013, but there has been no pre-assessment of occupational disease hazards, assessment of effects of occupational disease hazards control, or assessment of current condition of occupational disease hazards conducted. [HSE.1]

5. Health and Safety policies and procedures do not include following information:
- a) A list of equipment and/ or machines that require lockout-tagout in the factory;
 - b) Steps for workers to raise health and safety concerns;
 - c) Protection against retaliation for workers who raise health and safety concerns;
 - d) A list of confined spaces that require work permits and the precautions people must take prior to & upon entry and stay in each confined space. [ER.31.1, ER.31.2, HSE.14]

Local Law or Code Requirement

Fire Prevention Law of the People's Republic of China, Article 28; The Food Safety Operation Specifications for Catering Service, Article 7.9.2; Law of the People's Republic of China on the Prevention and Control of Occupational Diseases, Articles 17 and 18; Provisions on the Supervision and Administration of Occupational Health at Work Sites, Article; FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.1 HSE.3, HSE.6, and HSE.22)

Recommendations for Immediate Action

- 1. Ensure all fire extinguishers are accessible.
- 2. Keep food sample per legal requirement of more than 48 hours and the amount should be no less than 125g per sample.
- 3. Track and conduct statistical analysis for workers' illnesses.

COMPANY ACTION PLANS

Action Plan no 1.

Description

Samples for canteen food

Company Action Plan Update

The food in the canteen has been sampled as required.

Action Plan no 2.

Description

The food in the canteen has been sampled as required.

Company Action Plan Update

The food in the canteen has been sampled as required.

FINDING NO.11

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Review Process (Macro)

Finding Explanation

- 1. The factory has not conducted management or internal reviews to ensure that policies and procedures are updated according to local laws and the FLA Workplace Code and Benchmarks for any of the Employment Functions. [ER.1.3, ER.28.2, ER.29.1, ER.30.2, ER.31.2]
- 2. There is no management sign off (personal accountability) for instituting the factory's policies and procedures. [ER.1.2]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.28, ER.29, ER.30, and ER.31)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Company documents need to be renewed, updated and evaluated

Company Action Plan Update

The company has formulated documents requiring renewal and evaluation

Action Plan no 2.

Description

Company documents need to be renewed, updated and evaluated

Company Action Plan Update

The company has formulated documents requiring renewal and evaluation

FINDING NO.12

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Training (Macro)

Finding Explanation

1. The factory does not provide specific training for the relevant supervisors on any of the Employment Functions. In addition, the factory does not provide training to the relevant HR personnel and administrative staff on Workplace Conduct and Discipline. [ER.1.1, ER.17.1, ER.17.2, ER.17.3]

2. The orientation training for new workers does not include personnel development and retrenchment. [ER.1.2, ER.15.1]

3. There is no ongoing training for employees on personnel development and retrenchment. [ER.1.2, ER.15.2, ER.28.2]

4. The factory does not train workers with maintenance responsibilities on specific training on maintenance safety. [HSE.14.2]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.15, ER.17, and ER.28; Health, Safety and Environment Benchmark HSE.14)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1.The company trains managers in environmental protection

2.Training for Electricity Safety of Machine Repairers

Company Action Plan Update

1.The company has trained managers in environmental protection

2.The company has trained mechanics and electrical safety

Action Plan no 2.

Description

1.The company trains managers in environmental protection

2.Training for Electricity Safety of Machine Repairers

Company Action Plan Update

1.The company has trained managers in environmental protection

2.The company has trained mechanics and electrical safety

FINDING NO.13

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Communication & Worker Involvement (Macro)

Finding Explanation

1. The worker integration component is missing across all Employment Functions. This indicates that the factory has not established procedures to receive worker input/feedback on the creation, implementation, and revision of its policies and procedures. Furthermore, workers are neither systematically integrated, nor consulted in the decision-making processes. [ER.1, ER.25]

2. The factory does not communicate with workers regarding the Personnel Development and Retrenchment policies and procedures and their updates. [ER.28.2, ER.29.1, ER.30.2, ER.32.5]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1 ER.25, ER.28, ER.29, ER.30, and ER.32)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Relevant logos are required in the meeting area of staff representatives.

Company Action Plan Update

Print and post logo "Employee Representative Conference Room"

Action Plan no 2.

Description

Relevant logos are required in the meeting area of staff representatives.

Company Action Plan Update

Print and post logo "Employee Representative Conference Room"

FINDING NO.14

NOTABLE FEATURE

FINDING TYPE: Compensation

Finding Explanation

1. The factory provides two free meals (lunch and dinner) a day for all workers.

COMPANY ACTION PLANS

Action Plan no 1.

Description

Establishment of Piecework Salary Management System

Company Action Plan Update

A piece-by-piece remuneration management system has been established

FINDING NO.15

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Environmental Protection

Finding Explanation

1. The factory's Environmental Protection policies do not include a statement of the factory management's general support of energy and water efficiency, or a commitment to minimize impacts with respect to air emissions, waste, hazardous materials and other applicable environmental risks. [ER.31]

2. The factory's Environmental Protection procedures do not enable workers to raise environmental concerns, and do not guarantee protection for workers who allege environmental violations. [ER.31]

3. There is no procedure for reporting environmental emergencies. [ER.31.2.5]

Local Law or Code Requirement

FLA Workplace Code of Conduct (Employment Relationship Benchmark ER.31)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Company Signs Environmental Commitment

Company Action Plan Update

Signed Environmental Commitment

Action Plan no 2.

Description

Company Signs Environmental Commitment

Company Action Plan Update

Signed Environmental Commitment