



FAIR LABOR
ASSOCIATION®

INDEPENDENT EXTERNAL ASSESSMENT REPORT



COMPANIES: Jostens Inc.
COUNTRY: Mexico
ASSESSMENT DATE: 08/26/19
ASSESSOR: VeLar
PRODUCTS: Apparel
NUMBER OF WORKERS: 400

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.

FLA Code Element	Number of Violations
Hours of Work	2
Employment Relationship	19
Health, Safety, and Environment	12
Nondiscrimination	2
Freedom of Association	7

Findings and Action Plans

FINDING NO.1

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Training (Macro)

Finding Explanation

1. The facility does not regularly update its policies and procedures related training. [ER.15, ER.16]
2. Based on worker interviews, employees are familiar with the factory code of conduct. However, there is no mechanism to ensure that supervisors and workers have been trained or informed about the nature of the code. [ER.15, ER.16, ER.17]
3. The facility has not trained supervisors on the harassment and abuse policy or the discipline protocol. Assessors noted that workers did not have any complaints about supervisors' treatment during the interviews. [ER.17]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.15, ER.16, and ER.17)

COMPANY ACTION PLANS

Action Plan no 1.

Description

- 2) Code of conduct training is planned for the entire workforce in November 2019.
- 3) Harassment and abuse training for supervisors and employees is planned for November 2019.

Company Action Plan Update

1) Training is completed annually on the facilities policies and procedures. The Master training was updated 8/30/2019.

2) Training for the staff was completed 11/14/19 on the code of conduct.

3) supervisor training for the harassment, abuse, and discipline policies was completed 11/14/19.

FINDING NO.2

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

1. Although the facility has an established evaluation and promotion procedure based on worker competency, the procedures has not been effectively shared with the employees. Assessors noted during worker interviews that they do not know what it is expected from them to be promoted. [ER.28]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.28)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Complete job profile and categorize jobs for development. Restructure the development and training policies and procedures.

Company Action Plan Update

The process for job evaluations has been documented and training for all employees completed on our before 3/5/2020.

7/28/20 update: Strengthen knowledge of the ILU system by training staff, and included this in the quality management system to get commitment from all departments.

FINDING NO.3

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Industrial Relations

Finding Explanation

1. All factory employees are enrolled with the labor union named Sindicato de Trabajadores y Similares CMT, and they can have interviews with the Labor delegate on Saturdays; however, the factory has not provided a confidential place to have this conversation. On the audit day, these meetings were taking place throughout the building without confidential conditions. [FOA.15]

Local Law or Code Requirement

FLA Workplace Code (Freedom of Association Benchmark FOA.15)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Create a space within the facility for union representatives.

Company Action Plan Update

An office is set up for union representatives within the company. This was completed 10/22/2019.

FINDING NO.4

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. All five first-aid kits in the facility were locked and only the area supervisor has the key. During the assessment, only two of the five were able to be opened. The content of these two kits were correctly supplied but some medications were not in their original packaging. [HSE.6]
2. The factory does not have safety layouts for the working areas that include evacuation routes and firefighting equipment locations. [HSE.5]
3. The load capacity for the racks and the load shelves on the CEDIS (warehouse) shed is not specified. [HSE.14]
4. There is no specific Health and Safety Program for the Operation and Maintenance of Machinery and Equipment, which is legally required. [HSE.14]

Local Law or Code Requirement

Norma Oficial Mexicana Norma Oficial Mexicana NOM- 030-STPS-2009 Guía de Referencia II Fracción II.2.3.3 Inciso b); Norma Oficial Mexicana NOM-002-STPS-2010 Artículo 5.2; Norma Oficial Mexicana NOM-006-STPS-2014 Artículo 5.5, Artículo 9 Inciso c); Norma Oficial Mexicana NOM-004-STPS-1999 Artículo 5.3 Inciso a), FLA Workplace Code (Health, Safety, & Environment Benchmarks HSE.1, HSE.5, HSE.6, and HSE.14)

COMPANY ACTION PLANS

Action Plan no 1.

Description

- 4) Development of a health and safety program specific for the operation and maintenance of machinery and equipment. Training for the workers related to the operation and maintenance of machinery and equipment.

Company Action Plan Update

- 1) The procedure for access to first aid kits has been modified. All first aid kits are accessible to employees and the contents are limited to healing materials. This was completed 8/30/2019.
- 2) The safety layout has been updated to include evacuation routes and fire fighting equipment and posted in the work areas. This was completed 9/30/2019.
- 3) The load capacity for the racks on the de CEDIS has been located and specified. This was completed 9/25/2019.
- 4) A risk analysis of operation and maintenance of machinery and equipment has been completed. Training was completed 11/8/19.

FINDING NO.5

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. One of the two Automatic Tassel Machines in the assembly area was operating without a safety guard [HSE.14.1]
2. The position risk assessment for personal protective equipment (PPE) assignment indicates that it is mandatory for the stole packer position to use a gas respirator but assessors noted that neither of the two stole packers were using this PPE. The risk assessment also requires the softener position to use gloves but assessors noted that neither softener was using this PPE. The assessors confirmed that both types of PPE are provided to workers but the workers are not using the PPE. [HSE.7]
3. There is no eye shower station at the manufacturing area near the cap assembling process where chemicals are directly handled. [HSE.9.1]
4. The assessors did not find MSDS in the manufacturing shed and padprint process area, where chemicals such as T-90 T-II OIL, PLT6 SERIES: METALLIZZATE DYE, MIXER SX721 are used. [HSE.10.1]
5. The safety labeling on the conveyor machine in the Pick and Pack area of CEDIS (warehouse) shed is only in English and not in the local language (Spanish). [HSE.14.3]
6. Chemicals BLANACET LA-3053, PLT6 series: MATALLIZZATE dye, mix SX-721, and T90 T-II oil stored in the manufacturing shed are missing anti-spill containers. [HSE.9.1]

Local Law or Code Requirement

Norma Oficial Mexicana NOM-004-STPS-1999 Artículo 7.1 Inciso a); Norma Oficial Mexicana NOM-017-STPS-2008 Artículo 5.7; Norma Oficial Mexicana NOM-005-STPS-1998 Artículo 5.4; Norma Oficial Mexicana NOM-018-STPS-2015 Artículo 6.2; Norma Oficial Mexicana NOM-026-STPS-2008 Artículo 5.4; Norma Oficial Mexicana NOM-005-STPS-1998 Artículo 5.10; FLA Workplace Code (Health, Safety, & Environment Benchmark HSE.1, HSE.7, HSE.10, HSE.14)

Recommendations for Immediate Action

1. Install safety guards on the Automatic Tassel Machine.
2. Ensure all PPE is used correctly and that workers are trained on the usage.
3. Install an eye shower station near the caps assembly and stamping machines.
4. Have the MSDS of all chemicals used in the facility available on site.
5. Translate safety labeling for all machinery into the local language (Spanish).
6. Install anti-spillage containers for all chemical used.

COMPANY ACTION PLANS

Action Plan no 1.

Description

- 1) Safety guards have been installed on the automatic tassel machine. this was completed 8/28/2019.
- 2) An updated PPE analysis was completed in October. Training on proper PPE use has been completed and signs have been posted in the applicable work areas. Proper use is being verified in the weekly compliance audits.
- 3) The eye shower station has been installed between cap assembly and stamping machines. This was completed 8/28/2019.
- 4) MSDS's have been obtained for all chemicals in use and have been placed in the work areas. Training was completed in October 2019.
- 5) The safety labels on the conveyor are now posted in Spanish. This was completed 8/30/2019.
- 6) Anti spill containers have been purchased and installed for chemicals in the manufacturing shed. This was completed October 31, 2019.

Company Action Plan Update

Per the description above, these items have all been completed.