# INDEPENDENT EXTERNAL ASSESSMENT REPORT



COMPANIES: Fanatics Apparel, Inc. COUNTRY: China ASSESSMENT DATE: 07/29/19 ASSESSOR: Openview PRODUCTS: Apparel NUMBER OF WORKERS: 200

FAIR LABOR ASSOCIATION.

Improving Workers' Lives Worldwide

# Summary of Code Violations

Companies that join the FLA agree to uphold the FLA Workplace Code of Conduct throughout their entire supply chain. The Code of Conduct is based on International Labour Organization (ILO) standards, and defines labor standards that aim to achieve decent and humane working conditions.

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

FLA Code Element	Number of Violations
Compensation	3
Hours of Work	2
Employment Relationship	16
Health, Safety, and Environment	28
Harassment and Abuse	1
Freedom of Association	1

# **Findings and Action Plans**

**FINDING NO.1** 

# SUSTAINABLE IMPROVEMENT REQUIRED

# FINDING TYPE: Recruitment, Hiring & Personnel Development

#### Finding Explanation

1. The factory does not have written job descriptions for any positions. [ER.1.1]

2. The factory does not conduct performance reviews for any workers. [ER.29.1]

3. The factory does not provide workers with written documentation that substantiates all the issues covered in orientation. [ER.15.3]

#### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.15 and ER.29)

# COMPANY ACTION PLANS

#### Action Plan no 1.

#### Description

1,Factory will set up written job descriptions for all positions 2,Factory provide workers with written documentation that substantiates all the issues covered in orientation.3,Factory will enhance the procedures on worker's performance reviews and include processes on job rating, nondiscrimination and feedback from workers. For sustainable improvement, factory will establish policies and procedures integrating workers' feedback regarding job description, performance grading, nondiscrimination and written feedback from workers. Workers will be systematically integrated and consulted in decision-making processes. Related Training and consultation on the above listed topics will be provided to workers.

# IMMEDIATE ACTION REQUIRED

# FINDING TYPE: Compensation

#### Finding Explanation

1. The factory does not contribute to the Housing Provident Fund for any workers. [ER.22.1]

2. 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. [C.6]

3. The factory does not provide social insurance to all eligible workers. There are total 111 workers working in the factory, including 35 recruited after retirement workers. The factory only provided 66 out of 76 (87%) eligible workers with 5 types of social insurances in the latest payment month of July 2019. [C.1]

4. The factory contributes to 5 types of social insurances for 66 out of 76 (87%) eligible workers based on local minimum contribution base of CNY 3,368 (USD 478) per month, which is lower than legal requirement of worker's average monthly wage of previous year, ranging from CNY 3,500 (USD 496) to CNY 4,000 (USD 567). [C.10.1]

#### Local Law or Code Requirement

The Regulations on Management of Housing Provident Fund, Article 15; The Implementation Measures for Employee Paid Annual Leave, Article 4; The China Labor Law, Article 72; Social Insurance Law of the PRC, Article 60. FLA Workplace Code (Employment Relationship Benchmark ER.22; Compensation Benchmarks C.1, C.6 and C.10)

#### Recommendations for Immediate Action

1. Provide all workers with legally required Housing Provident Fund.

- 2. Calculate annual leave based on worker's cumulative working experience (working age).
- 3. Provide social insurance to all eligible workers.
- 4. Contribute to social insurance based on worker's average monthly wage of previous year.

### COMPANY ACTION PLANS

#### Action Plan no 1.

#### Description

1. factory will check with the government on the Housing provident fund requirement. 2. factory will consider workers previousl job experience when computing annual leave. 3. Factory will provide training to workers and impove on social insurance coverage.4. Factory will check with government on the use of average monthly wage in computing social insurance contribution. Social Insurance and paid annual leave training will be provided to factory managers. For sustainable improvement: 1) Factory will set up policy and procedures ensuring all employees are paid with at least the legal minimum wage and overtime payment at the legal premium rate. Factory will also keep abreast and update on law regarding any change on legal minimum wage rate 2,Factory will set up policy and procedure ensuring all legally required paid leave are provided to all workers. Related training will be provided to all workers on legal benefits.

3, Factory will encourage workers to enroll to social insurance scheme and set up plan to increase social insurance coverage.

4, Factory will compute social insurance contributions based on the legal requirement.

5, Related training on benefit of social insurance, wages and employee benefits will be provided to all workers.

#### FINDING NO.3

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Hours of Work

#### Finding Explanation

1. The factory did not maintain time records for at least 12 months, prior to February 2019. Time records for the period from February 2019 to July 2019 (as of the assessment dates of July 29 and July 30, 2019) are maintained and provided for review during the assessment. However, time records before February 2019 are not maintained because they were kept in the private computer of social compliance clerk, who resigned in February 2019. [ER.23.3]

2. The factory sets the production plan based on 57 hours per week (a total of six days per week with nine point five hours each day, including eight regular hours and one point five overtime hours). Factory management sets production targets and production system at a level that workers need to work 17 overtime hours per week. [ER.24]

3. Workers' monthly overtime hours exceed legal requirement. Time records review for the period from February 2019 to July 2019 notes that the monthly overtime for 90% of workers exceeded 36 hours in all reviewed months except February 2019, with a maximum of 79 overtime hours in March 2019. [HOW.1.1]

#### Local Law or Code Requirement

The China Labor Law, Article 41. FLA Workplace Code (Employment Relationship Benchmarks ER.23 and ER.24; Hours of Work Benchmark HOW.1)

#### Recommendations for Immediate Action

- 1. Maintain time records for at least 12 months.
- 2. Ensure overtime hours do not exceed 36 per month.
- 3. Set production plan based on regular working hours.

### COMPANY ACTION PLANS

#### Action Plan no 1.

#### **Description**

1. Factory has updated the computer's system and backed up attendance data to hard disk monthly. 2. Factory will set the production plan based on 40 regular working hours / week. 3. Factory will improve on excessive overtime work to meet the law requirement. For sustainable improvement: 1, Factory will set up policy/procedures in reducing excessive overtime working hours by retaining skillful workers, improve workers' satisfaction, improve communication between supervisor and workers, provide on the job training to improve efficiency.. (will complete on 2020.01.30). 2.Factory will eliminate mandatory overtime work requirement on the production plan, or require employee to work overtime on a regular basis. The normal working hours will be based on the labor law requirement and communicate to all workers. 3,Factory will conduct an analysis on overtime work to find out the root cause and to progressively reduce excessive hours of work. (will complete on 2020.01.30)

# FINDING NO.4

### SUSTAINABLE IMPROVEMENT REQUIRED

### **FINDING TYPE: Industrial Relations**

#### Finding Explanation

1. The factory does not provide office space to the trade union. [FOA.15]

2. The factory pays the union dues instead of the workers. [FOA.10]

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.2 and FOA.15)

# COMPANY ACTION PLANS

Action Plan no 1.

Description

Factory will make improvement and ensure freedom of association is exercised fully and legally in the factory according to the law and FLA requirement. Training on freedom of association will be provided to workers.

### **FINDING NO.5**

### SUSTAINABLE IMPROVEMENT REQUIRED

### FINDING TYPE: Workplace Conduct & Discipline

#### Finding Explanation

1. The factory does not establish a system to discipline supervisors, managers or workers who engage in any form of harassment or abuse. [H/A.11]

Local Law or Code Requirement FLA Workplace Code (Harassment or Abuse Benchmark H/A.11)

### COMPANY ACTION PLANS

Action Plan no 1.

**Description** 

The factory will provided trainings to supervisors on Harassment, Abuse and discipling system. For sustainable improvement: factory will establish policies and procedures integrating workers' feedback regarding policy and procedures for harassment and Abuse. Workers will be systematically integrated and consulted in decision-making processes. Related Training and consultation on the above listed topics will be provided to workers.

### **FINDING NO.6**

### IMMEDIATE ACTION REQUIRED

### **FINDING TYPE: Environmental Protection**

#### Finding Explanation

1. Domestic waste is stored outdoors directly on the ground, in an open area near the kitchen, instead of being placed in storage containers in the enclosed waste storage area. [HSE.1]

2. The factory has not maintained disposal records for industrial solid waste. [HSE.5.1]

3. The factory does not filer the air emission generated from kitchen before its release into the environment. [HSE.1]

4. The factory has not conducted monitoring on the air emission from kitchen to demonstrate it meets legal standards. [HSE.1]

5. The factory has not conducted an assessment to identify the equipment containing ozone depleting substances (ODSs), e.g., CFCs, Halon, HCFCs, HBFCs, Carbon Tetrachloride, Methyl Chloroform, Methyl Bromides, Bromochloromethane, or set up plan to phase-out their use. [HSE.1]

#### Local Law or Code Requirement

China Law of Prevention and Treatment of Environmental Pollution by Solid Wastes, Article 17 and Article 32; Measures for the Administration of Environmental Surveillance, Article 21. FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.1 and HSE.5)

Recommendations for Immediate Action

- 1. Store domestic wastes in storage containers in enclosure area.
- 2. Maintain disposal records for industrial solid wastes.
- 3. Filter the air emission generated from kitchen before its release into the environment.
- 4. Conduct monitoring on the air emission from kitchen annually to demonstrate it meets legal standards.

# COMPANY ACTION PLANS

#### Action Plan no 1.

#### Description

1. Store domestic wastes in storage containers in enclosed area.2. Maintain disposal records for industrial solid wastes. 3. Fty is consulting with relevant government department regarding air emission from kitchen and an assessment to identify the equipment containing ozone depleting substances. For sustainable improvement: 1. Establish EHS environmental health and safety team. 2. Improve ESH policies and procedures, including storing wastes in containers, recording waste disposal ,monitoring on the air emission from kitchen's workers will be systematically integrated and consulted in decision-making processes. Related Training and consultation on the above listed topics will be provided to workers.

### **FINDING NO.7**

# IMMEDIATE ACTION REQUIRED

# FINDING TYPE: Health & Safety

#### Finding Explanation

1. The factory has not contracted a qualified company to conduct annual maintenance for the fire-fighting equipment in both the production area and dormitory area, including fire extinguishers, fire hydrants, smoke detectors and sprinkler system, etc. The maintenance labels on fire extinguishers indicate that maintenance was last conducted in 2014 to 2015. [HSE.6.1] [HSE.25.1]

2. The factory has not marked the locations of first aid kits, and incorrectly marked the locations of the fire alarms on the evacuation maps in both the production area and dormitory area. In addition, about 50% of the evacuation maps in both production area and dormitory area are not consistent with the actual layout. [HSE.5.1] [HSE.25.1]

3. The factory has not conducted assessments after the fire evacuation drills to learn how to improve the evacuation process. [HSE.5.1]

#### Local Law or Code Requirement

China Fire Prevention Law, Article 16.3 and Article 34; Escape and Evacuation-Principles and Requirements (GB/T 25894-2010), Article 5.10, Article 5.11 and Article 7.3. FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.5, HSE.6 and HSE.25)

#### Recommendations for Immediate Action

1. Contract qualified company to conduct annual maintenance of fire-fighting equipment in both production area and dormitory area to ensure they are in good condition and ready to use in case of an emergency.

2. Enhance current evacuation maps in both production area and dormitory area to include complete and accurate information as well as consistent with the actual layout.

# COMPANY ACTION PLANS

#### Action Plan no 1.

#### Description

1,Factory will arrange conduct annual maintenance for the fire-fighting equipment in both the production area and dormitory area, including fire extinguishers, fire hydrants, smoke detectors and sprinkler system. 2. Factory will update the evacuation maps and ensure all the maps are consistent with the actual layout. 3. Factory will conduct assessmeths after the fire drill to impove the evacuation process. For sustainable improvement: 1. Contract qualified company to conduct annual maintenance of fire-fighting equipment in both production area and dormitory area to ensure they are in good condition and ready to use in case of an emergency. 2. Enhance current evacuation maps in both production area and dormitory area to include complete and accurate information as well as consistent with the actual layout.

### **FINDING NO.8**

# IMMEDIATE ACTION REQUIRED

# FINDING TYPE: Health & Safety

#### Finding Explanation

1. The electrical scissor operator does not wear metal mesh gloves while working. In addition, workers in the sewing workshop do not wear dust-proof masks when handling materials that generate fabric dust. [HSE.8]

2. The factory has not installed needle guards on 10% of the sewing machines or eye protective shields on either of the high speed stitching machines. [HSE.14.1]

3. The factory has not posted safety instructions near most machines, including the buttoning machines, sewing machines, and lamination machines. The factory also has not posted warning signs to remind workers to wear appropriate personal protective equipment (PPE) in the workshops. In addition, the warning labels on buttoning machines are in English instead of Chinese. [HSE.14.3]

4. The factory has not installed inner insulation boards on 50% of the electrical panels in production area. Dust and fabric lint have accumulated in the electrical panels in the sewing and packing workshops. Production materials are placed under two electrical panels in sewing and packing workshop and another switch box in the aisle of dormitory building are not covered. [HSE.13] [HSE.25.1]

#### Local Law or Code Requirement

Law of the China on Work Safety, Article 42; Code of Design of Manufacturing Equipment Safety and Hygiene, Article 6.1.6; Electricity Safety Guidelines, Article 5.1.1. FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.8, HSE.13, HSE.14 and HSE.25)

#### Recommendations for Immediate Action

1. Strengthen training and supervise workers to use personal protective equipment (PPE) consistently during work hours.

2. Install appropriate machine safety guards and train workers to use safety guards properly during work hours.

3. Post safety instructions on or near machines and post warning signs to remind workers to wear appropriate PPE in workshops. Ensure warning labels on machines are in the language spoken by the workers i.e. Chinese.

4. Install inner insulation boards on all electrical panels, clean the electrical panels regularly to ensure they are dust and lint free, keep electrical panels free from obstruction and ensure electrical boxes are properly covered.

### COMPANY ACTION PLANS

#### Action Plan no 1.

#### Description

1, The electrical scissor operator wear metal mesh gloves while working. 2, workers in the sewing workshop wear dust-proof masks when handling materials that generate fabric dust. Factory will install needle guards on the sewing machines and eye protective shields on the high speed stitching machines. 3. Factory will post safety instuctions near all machinery. Warning signs will be

posted to remind workers of using PPE properly. Also, warning labesl will be translated to Chinese. 4. Insulation boards will be installed in all the electrical panels. We will check and clean up all the electrical panels from dust or fabric

lint. For sustainable improvement: 1. Strengthen training and supervise workers to use personal protective equipment (PPE) consistently during work hours. (already improved on 2019.10.14) 2. Install appropriate machine safety guards and train workers to use safety guards properly during work hours. (already improved on 2019.10.14) 3. Post safety instructions on or near machines and post warning signs to remind workers to wear appropriate PPE in workshops. Ensure warning labels on machines are in the language spoken by the workers i.e. Chinese. 4. Install inner insulation boards on all electrical panels, clean the electrical panels regularly to ensure they are dust and lint free, keep electrical panels free from obstruction and ensure electrical boxes are properly covered. (already improved on 2019.10.14)

### FINDING NO.9

# IMMEDIATE ACTION REQUIRED

# FINDING TYPE: Health & Safety

#### Finding Explanation

1. The factory does not clean up the debris in workshops in a timely manner. [HSE.19]

2. The dormitory is not clean or sanitary with lots of dust on the floors of aisles. In addition, about 30% of lamps in dormitory aisles are missing bulbs. [HSE.25.1]

- 3. Kitchen workers do not wear hair nets or hygiene masks while preparing food. [HSE.22.1]
- 4. One of the two kitchen workers does not have a health certificate. [HSE.22.1]

5. The factory does not keep food samples, which is not in compliance with legal requirement of keeping food samples for at least 48 hours in refrigerator. [HSE.19]

6. The factory does not conduct annual drinking water test. The latest testing report was issued in 2017. [HSE.23.1]

7. The factory does not provide soap or drying facilities at the toilets in the production area. [HSE.19]

#### Local Law or Code Requirement

China Law on Food Safety, Article 33 and Article 45; The Food Safety Operation Specifications for Catering Service, Article 7.9.2. FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.19, HSE.22, HSE.23 and HSE.25)

#### Recommendations for Immediate Action

1. Keep workshops in good order by cleaning up the debris in a timely manner.

- 2. Conduct regular cleaning and maintenance in dormitory building.
- 3. Strengthen training and supervise kitchen workers to wear hair nets and hygiene masks while preparing food.
- 4. Ensure all kitchen workers obtain health certificates.
- 5. Keep food samples for at least 48 hours in refrigerator as per legal requirement.
- 6. Conduct annual drinking water test to ensure it is clean and safe.

# COMPANY ACTION PLANS

# Action Plan no 1.

# **Description**

1, factory cleaned up the debris in workshops in a timely manner.

2. ,factory cleaned up the dormitory building, and added lamps with bulbs in dormitory aisles.
3,kitchen workers wear hair nets and hygiene masks while preparing food.
4,kitchen worker will apply for the health certificates. Factory keep food samples for at least 48 hours in refrigerator as per legal requirement.
5,Factory provides soap at the toilets in the production area.
6.factory will conduct annual drinking water test to ensure water is clean and safe.

by cleaning up the debris in a timely manner. (already improved on 2019.10.14)

2. Conduct regular cleaning and maintenance in dormitory building. (already improved on 2019.10.14)

3. Strengthen training and supervise kitchen workers to wear hair nets and hygiene masks while preparing food. (already improved on 2019.10.14)

4. Ensure all kitchen workers obtain health certificates. (already improved on 2019.10.14)

5. Keep food samples for at least 48 hours in refrigerator as per legal requirement.

6. Conduct annual drinking water test to ensure it is clean and safe. production area.(already improved on 2019.10.14)

7,Factory provides soap at the toilets in the

# FINDING NO.10

# SUSTAINABLE IMPROVEMENT REQUIRED

### FINDING TYPE: Health & Safety

#### Finding Explanation

1. The factory does not keep records of work-related injuries including minor injuries and near misses. In addition, no records of investigations or corrective actions have been maintained.[HSE.3.2]

2. The factory has not conducted an ergonomic risk assessment or taken proactive steps to reduce repetitive-motion stress or injuries (e.g. breaks, adjustable workstations). Workers working in sitting position in the sewing and packing workshops are not provided with adjustable chairs with backrests. [HSE.17.1]

3. The factory has not conducted assessments for determining thermal comfort problem areas. No thermometers are installed to monitor the temperature in the workshops. [HSE.13]

4. The factory was established in 2003 and specializes in garments production with main processes of cutting, sewing, ironing, inspection and packing. However, the factory has not conducted any type of occupational health assessment. [HSE.1]

5. The factory has no procedure to manage contractor safety and does not provide safety information to contractors. [HSE.1]

#### Local Law or Code Requirement

Law of the People's Republic of China on the Prevention and Control of Occupational Diseases, Article 17 and Article 18. FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.1, HSE.3, HSE.13 and HSE.17)

### COMPANY ACTION PLANS

#### Action Plan no 1.

#### Description

1,Factory will keep a record for any work-related injuries. assessment and take steps to reduce repetitive motion stress.

comfort level and temperature in the workshop. conduct occupational health assessment.

4, Factory will

For sustainable

improvement: 1, The factory is consulting with relative government dept. regarding occupational health assessment 2, Establish EHS environmental health and safety team

3, Improve ESH policies and procedures, including keeping a record for any work-related injuries, using thermometer to measure the comfort level, managing contractor safety.

4. Workers will be systematically integrated and consulted in decision-making processes. Related Training and consultation on the above listed topics will be provided to workers.

# **FINDING NO.11**

SUSTAINABLE IMPROVEMENT REQUIRED

# FINDING TYPE: Policies & Procedures (Macro)

#### Finding Explanation

1. The factory has not established policies or procedures on promotion, demotion, and job reassignment. [ER.30.1]

2. The factory has policies and procedures on hours of work, but the procedures do not include the exceptional circumstance such as urgent orders or power outages. [ER.23.1]

Local Law or Code Requirement FLA Workplace Code (Employment Relationship Benchmarks ER.23 and ER.30)

# COMPANY ACTION PLANS

Action Plan no 1.

Description

Factory established policies or procedures on promotion, demotion, and job reassignment immediately. 1, Factory established policies or procedures on promotion, demotion, and job reassignment immediately 2, Factory will enhance the procedures on exceptional circumstance such as urgent orders or power outages. 3, Workers will be systematically integrated and consulted in decision-making processes. 4, Related Training and consultation on the above

listed topics will be provided to workers.

# **FINDING NO.12**

# SUSTAINABLE IMPROVEMENT REQUIRED

# FINDING TYPE: Review Process (Macro)

#### Finding Explanation

1. The factory has not conducted a regular review of Employee Handbook, and the latest review of Employee Handbook was conducted on November 10, 2009. However, the factory has conducted management and internal reviews to ensure that other policies and procedures are updated according to local laws, FLA Workplace Code and Benchmarks for all Employment Functions. [ER.1.3]

2. The factory does not have gualified staff responsible for social compliance issues at the workplace. Factory management explained that the former staff responsible for social compliance resigned in February 2019 and the factory is still recruiting for the position. [ER.1.2]

Local Law or Code Requirement FLA Workplace Code (Employment Relationship Benchmark ER.1)

# COMPANY ACTION PLANS

### Action Plan no 1.

Description

Now we have a full-time staff who is responsible for social compliance issues at the workplace, and will conduct a regular review of Employee Handbook. 1, Factory will establish policies and procedures regarding establishment, implementation, and updating of its policies and procedures on Employees' handbook, related Training will be provided to workers. 2, Factory will conduct management/internal review to ensure policies and procedures are updated according to local laws and the FLA Workplace Code and Benchmarks.

3, The factory will formally define the person(s) for social compliance issue in the factory, or for any employment functions.

4, Senior management will sign-off on the factory's policies and procedures for implementation.

#### Company Action Plan Update

Now we have a full-time staff who is responsible for social compliance issues at the workplace, and will conduct a regular review of Employee Handbook. 1,Factory will establish policies and procedures regarding establishment, implementation, and updating of its policies and procedures on Employees' handbook,related Training will be provided to workers. 2, Factory will conduct management/internal review to ensure policies and procedures are updated according to local laws and the FLA Workplace Code and Benchmarks.

3, The factory will formally define the person(s) for social compliance issue in the factory, or for any employment functions.

4, Senior management will sign-off on the factory's policies and procedures for implementation.

# FINDING NO.13

### SUSTAINABLE IMPROVEMENT REQUIRED

# FINDING TYPE: Training (Macro)

#### Finding Explanation

1. The factory does not provide specific training to the relevant supervisors on any of the Employment Functions. [ER.17.1]

2. The factory does not provide training to workers on ergonomics, including lifting techniques. [HSE.17.2]

3. The factory does not provide safety training to maintenance workers working with electrical issues and lockout/tagout program. [HSE.14.2]

4. The factory does not provide training to health and safety committee members. [HSE.1]

5. Canteen workers do not receive specific hygiene training. [ER.1.2]

6. Dormitory workers do not receive specific health and safety training. [ER.1.2]

#### Local Law or Code Requirement

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

# COMPANY ACTION PLANS

#### Action Plan no 1.

#### Description

1, The employment functions training will be provided to relevant supervisors.

3, Electrical issues and lockout/tagout program

training will be provided to maintenance workers.

2, Ergonomics training will be provided to porter workers.

4,Health and safety training will provide to committee members.5,Specific hygiene training will provide to canteenworkers.6,Specific health and safety training will provide to dormitory workers. For sustainable improvement, factorywill establish policies and procedures integrating workers' feedback regarding the employment Functions training, ergonomics

training ,electrical issues and lockout/tagout program training , health and safety training , specific hygiene training , specific health and safety training ,establishment, implementation, and updating of its policies and procedures on Recruitment, Hiring & Personnel Development; Compensation; Hours of Work; Industrial Relations; Grievance System; Workplace Conduct & Discipline; Termination & Retrenchment; Environmental Protection; and Health & Safety.

Workers will be systematically integrated and consulted in decision-making processes. Related Training and consultation on the above listed topics will be provided to workers.

#### Company Action Plan Update

1. The employment functions training will be provided to relevant supervisors.

2, Ergonomics training will be provided to porter workers. 3, Electrical issues and lockout/tagout program training will be provided to maintenance workers.

4,Health and safety training will provide to committee members.5,Specific hygiene training will provide to canteenworkers.6,Specific health and safety training will provide to dormitory workers.