



FAIR LABOR
ASSOCIATION®

INDEPENDENT EXTERNAL ASSESSMENT REPORT



COMPANIES: Commemorative Brands Inc.

COUNTRY: United States

ASSESSMENT DATE: 08/27/19

ASSESSOR: Miriam Rodriguez

PRODUCTS: Promotional Products

NUMBER OF WORKERS: 25

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	3
Employment Relationship	4
Health, Safety, and Environment	27

Findings and Action Plans

FINDING NO.1

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

The facility did not provide documented evidence of conducting performance reviews on an annual or periodic basis. Additionally, they do not communicate the performance review process to the workforce. [ER.29]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.29)

COMPANY ACTION PLANS

Action Plan no 1.

Description

conduct performance reviews on all permanent staff. communicate the performance review process to staff

Planned completion date

10/15/19

Company Action Plan Update

Facility manager Mary Lignitz is working in coordination with our HR department to update our current process related to performance evaluations.

All performance reviews were completed on 12/12/2019

FINDING NO.2

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The facility has neither conducted nor communicated to the workforce the procedures or plans for emergencies such as a fire drill or tornado, etc. The last fire drill was conducted in December 20, 2010. Even though the facility has less than 10 individuals, no training is not provided. In addition, during the peak season, the office has temporary workers who are not aware of the emergency procedures. [HSE.5.2]
2. The facility's only first aid kit had expired supplies. In addition, the facility has neither identified nor trained any employee on first aid techniques. Furthermore, employees were last trained on fire extinguisher usage in May 2010. [HSE.6.1, HSE.6.2]
3. A certified trainer has not trained the employee assigned to operate the forklift, and the employee does not have the necessary license to operate, as per OSHA Guidelines. [HSE.14.2]
4. The facility does not keep records of work-related injuries, fatalities, accidents, or incidents for the past five years, as per OSHA requirement. [HSE.2]

Local Law or Code Requirement

OSHA 29 CFR 1904.33 (Retention of Records)29 CFR 1910.38 (Emergency Action Plans), 1910.151(a) (First Aid Kits Non Mandatory), 1910.151(a) (First Aid training), 1910.178(i) (Operator Training for Powered Industrial Trucks), 1910.178(q) Maintenance of Industrial Trucks), 29CFR1904.33 (Records); FLA Workplace Code (Health, Safety, and Environment HSE.2, HSE.5.2, HSE.6.1, HSE.6.2, HSE.14.2)

Recommendations for Immediate Action

1. Plan and conduct appropriate drills for fire or other emergency. Document and review these drills so that corrective actions may be implemented.
2. Conduct monthly reviews on first aid kits, ensuring all supplies are within the expiry period. Also, identify and train an employee on first aid and fire extinguisher techniques.
3. Identify and train all employees responsible for or required to operate the forklift. Maintain documents of training and license.
4. Keep records of work-related injuries, fatalities, accidents, or incidents for the past five years.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. fire drill was performed on 9/4/19. Emergency plans were discussed with all staff. A separate fire drill and review of emergency plans will take place once temporary staff are present at the facility.
2. We have replaced the old first aid kit with a new one and informed permanent employees. we are in the process of contacting an appropriate instructor to conduct a first aid and fire extinguisher instructions. temporary staff will be informed of the first aid

kit location.

3. Currently in process of having all relevant staff certified for forklift use.

4. An accident and incident report will be posted and updated quarterly. All old reports will be placed in a permanent file for review.

5. All forklift training has been completed

Planned completion date

10/15/19

Company Action Plan Update

1. Fire drill training was performed on 9/4/19 along with safety and review of emergency procedures.

2. New first aid kit installed. in process of contracting trainer for first aid and fire extinguisher training.

3. forklift training is scheduled for 12/9/19

4. Accident and incident report not posted in office to be updated quarterly.

5. All forklift training completed on 12/19/19