**Verification Assessment**

**COMPANIES:** Rawlings Sporting Goods Company, Inc.

**COUNTRY:** China

**ASSESSMENT DATE:** 12/29/17

**ASSESOR:** FLA China

**PRODUCTS:** Other

**NUMBER OF WORKERS:**

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**FLA Comments**

This report was submitted to the FLA and the FLA affiliated company by the assessor. Despite deadlines missed and interest for submission of a corrective action plan, the FLA has not received a plan to address the risks and noncompliances raised in the report. Therefore, the report is posted in its current state and will be updated once a correct the action plan has been submitted to the FLA.
Summary of Code Violations

Employees that fail to fully agree to the FLA Workforce Code of Conduct throughout their due work cycle. The Code of Conduct is based on International Labour Standards (ICS) standards, and delimits labor standards that aim to achieve decent and humane working conditions.

This report is intended to make notes on findings of the FLA Workforce Code of Conduct survey, the purpose of these findings is not to test compliance against a particular benchmark, but rather to develop an action framework of short and long-term improvements that can be made to achieve compliance. Code of Conduct findings can be found throughout the report as a result of the survey of the employment and management systems, and are addressed in respective sections.

Previous Report Findings and Verification Results

PREVIOUS FINDING NO. 1

SUSTAINABLE IMPROVEMENT REQUIRED

FINING TYPE: Recruitment, Hiring & Personnel Development

Finding Status: Remediated

The factory has not established written policies or procedures for performance reviews. The factory does not conduct regular performance reviews for employees.

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

Explanation: Based on a documentation review, assessors found that the factory contributed to the Employment Security Fund in lieu of employing disabled workers.

FINDING RESULT

Local Law or Code Requirement

Recommendations for Immediate Action

Summary of Code Violations

While it is important to note when violations of the FLA Workplace Code of Conduct occur, the purpose of these findings is not to test compliance against a particular benchmark, but rather to develop an action framework of short and long-term improvements that can be made to achieve compliance. Code of Conduct findings can be found throughout the report as a result of the survey of the employment and management systems, and are addressed in respective sections.
SUSTAINABLE IMPROVEMENT REQUIRED

PREVIOUS FINDING NO. 5

FINDING TYPE: Workforce Conduct & Discipline

Finding Status: Remediated

Explanation: The factory does not maintain written records of disciplinary actions. Over the last year, factory management has handled them verbally without keeping a written record.

Local Law or Code Requirement

Explanation: Based on a document review and management interviews, the factory maintains written records of disciplinary actions and keeps the related regulations violation user records.

PREVIOUS FINDING NO. 6

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Review Process (Macro)

Finding Status: Remediated

Finding Explanation:

Root Causes: Examinations would increase the cost to the factory.

Finding Status: Partially Remediated

Remediation Details:

Explanation: The factory does not have procedures that enable workers to raise health and safety concerns, and protect workers who raise concerns from retaliation.

Finding Status: Remediated

Finding Explanation:

Root Causes: The factory has not developed polices and procedure on a review process to ensure that updates are made according to local law and FLA Workplace Code requirements. As a result, they have conducted internal reviews for the following Employment Functions: Recruitment, Hiring & Personnel Development, Termination & Retrenchment, Workplace Conduct & Discipline, Grievance System, and Environmental Protection.

Local Law or Code Requirement

Explanation: Based on a document review and management interviews, the factory maintains written records of disciplinary actions and keeps the related regulations violation user records.

PREVIOUS FINDING NO. 7

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Communication & Worker Involvement (Macro)

Finding Status: Remediated

Finding Explanation:

Root Causes: The factory provides specific training for managers and supervisors for the following employment functions: Recruitment, Hiring & Personnel Development, Compensation, Human of Work, Termination & Retrenchment, Workplace Conduct & Discipline, Grievance System, and Environmental Protection.

Finding Status: Partially Remediated

Finding Explanation:

Root Causes: The factory has not conducted an audit of the management systems, so they do not have the necessary awareness and experience necessary to establish a social compliance system.

Local Law or Code Requirement

Explanation: Based on a document review and management interviews, the factory maintains written records of disciplinary actions and keeps the related regulations violation user records.

PREVIOUS FINDING NO. 8

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Training (Macro)

Finding Status: Remediated

Finding Explanation:

Root Causes: The factory has not developed polices and procedures for training employees for the following employment functions: Recruitment, Hiring & Personnel Development, Termination & Retrenchment, Workplace Conduct & Discipline, Grievance System, and Environmental Protection.

Local Law or Code Requirement

Explanation: Based on a document review and management interviews, the factory maintains written records of disciplinary actions and keeps the related regulations violation user records.

PREVIOUS FINDING NO. 9

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Health & Safety

Finding Status: Remediated

Finding Explanation:

Root Causes: The factory has not conducted an internal review for the following employment functions: Recruitment, Hiring & Personnel Development, Termination & Retrenchment, Workplace Conduct & Discipline, Grievance System, and Environmental Protection.

Local Law or Code Requirement

Explanation: Based on a document review and management interviews, the factory maintains written records of disciplinary actions and keeps the related regulations violation user records.

PREVIOUS FINDING NO. 10

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Status: Remediated

Finding Explanation:

Root Causes: The factory has not developed polices and procedures for the following employment functions: Recruitment, Hiring & Personnel Development, Termination & Retrenchment, Workplace Conduct & Discipline, Grievance System, and Environmental Protection.

Local Law or Code Requirement

Explanation: Based on a document review and management interviews, the factory maintains written records of disciplinary actions and keeps the related regulations violation user records.
1. Create a list of replacement and readjust tools that require lock-out/tag-out.
2. Remove combustible materials from the stairwell, and ensure that they are properly cleaned.
3. Relocate drinking water facilities outside the building to reduce fire risk.
4. Require food service workers to wear hair nets, gloves, and masks while preparing and serving food.

**Recommendations for Immediate Action**

1. During a factory tour, assessors observed that chemical containers, such as the white glue used in the workshop and the chemical storage warehouse, were not labeled. HSE.9
2. The factory does not communicate its Environmental Protection policies or procedures to the general workforce.

**Previous Finding No. 11**

**Immediate Action Required**

**Finding Type:** Environmental Protection

**Finding Status:** Remediated

**Explanation:** Based on a factory tour and management interviews, assessors determined that hazardous waste, such as fluorescent tubes, were transferred to a regular waste disposal facility which is not qualified to dispose of hazardous waste. HSE.1, HSE.9

**Finding Status:** Not Remediated

**Explanation:** During a factory tour, assessors observed that the hazardous waste containers in the factory were labeled correctly and stored in the special warehouse.

**Finding Status:** Remediated

**Explanation:** Most workers have still not received specific or ongoing training on Environmental Protection. ER.1, ER.15

**Finding Status:** Remediated

**Explanation:** During a factory tour, assessors determined that all stairwells were clear and no combustible materials were stored in stairwells.

**Finding Status:** Remediated

**Explanation:** During a factory tour, assessors determined that drinking water stations are located outside the pedestrian walkway, far away from hazardous chemicals.

**Finding Status:** Remediated

**Explanation:** During a factory tour, assessors observed that the kitchen staff were wearing hairnets, gloves, and masks while preparing and serving food.

**Previous Finding No. 12**

**Sustainable Improvement Required**

**Finding Type:** Industrial Relations

**Finding Status:** Remediated

**Explanation:** The factory did not provide proper education on the importance of Environmental Protection. The factory did not provide environmental education to ensure that all workers understand the importance of environmental protection. ER.31

**Finding Status:** Remediated

**Explanation:** The factory did not have a proper training program that addressed environmental protection. ER.31

**Finding Status:** Remediated

**Explanation:** During a factory tour, assessors observed that hazardous waste is stored properly. The factory did not find a qualified hazardous waste disposal facility in the local area.

**Previous Finding No. 13**

**Sustainable Improvement Required**

**Finding Type:** Environmental Protection

**Finding Status:** Remediated

**Explanation:** Root Causes: Factory management was unaware that fluorescent tubes were hazardous waste. The factory did not find a qualified hazardous waste disposal facility in the local area.

**Finding Status:** Remediated

**Explanation:** Root Causes: The factory management is unaware of how to conduct this training. The factory has not conducted an environmental audit, so they do not have the experience and awareness to create an environmental management system.

**Finding Status:** Remediated

**Explanation:** Root Causes: The factory does not have proper management systems in place that address environmental protection. ER.31

**Finding Status:** Remediated

**Explanation:** The factory does not have procedures in place that enable workers to raise environmental concerns or that protect workers who allege environmental violations against retaliation. ER.31

**Finding Status:** Remediated

**Explanation:** Most workers have still not received specific or ongoing training on Environmental Protection. ER.1, ER.15

**Finding Status:** Remediated

**Explanation:** Most employees have not received environmental protection training. ER.1, ER.15

**Finding Status:** Remediated

**Explanation:** During a factory tour, assessors determined that drinking water stations are located outside the pedestrian walkway, far away from hazardous chemicals. ER.4

**Finding Status:** Remediated

**Explanation:** During a factory tour, assessors observed that chemical containers, such as the white glue used in the workshop and the chemical storage warehouse, were not labeled. HSE.9

**Finding Status:** Remediated

**Explanation:** During a factory tour, assessors observed that the kitchen staff was wearing hairnets, gloves, and masks while preparing and serving food.