



FAIR LABOR
ASSOCIATION®

INDEPENDENT EXTERNAL ASSESSMENT REPORT



Verification Assessment

COMPANIES: Commemorative Brands Inc.
COUNTRY: United States
ASSESSMENT DATE: 09/10/18
ASSESSOR: Miriam Rodriguez
PRODUCTS: Other
NUMBER OF WORKERS: 95

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.

Previous Report Findings and Verification Results

PREVIOUS FINDING NO.1

NOTABLE FEATURE

FINDING TYPE: Communication & Worker Involvement (Macro)

Finding Explanation

The company has set up computer kiosks in the break room for the usage of all employees, especially production workers to access CBI's HR website. Through this venue, any individual worker can access current company policies (which are available in both English and Spanish) as well as their individual employee records and request a copy of payroll check, review or request vacation days, or send an inquiry to HR. The website is also accessible from home which allows an employee access at any time.

PREVIOUS FINDING NO.2

NOTABLE FEATURE

FINDING TYPE: Grievance System

Finding Explanation

Even though CBI has an active union and on-site HR department to handle grievances, the Company also utilizes Lighthouse Confidential Hotline as another tool for any CBI employee to raise a grievance or concern.

New Findings and Action Plans

NEW FINDING NO.1

NOTABLE FEATURE

FINDING TYPE: Environmental Protection

Finding Explanation

1. Environmentally Friendly Stones: CBI does not mine gemstones but uses simulated birthstones for rings. The simulated birthstones are all lab created stones, with many sharing the same chemical properties as genuine stones. With the exception of diamonds, the birthstones are not mined and are eco-friendly stones. CBI also adheres to the Kimberley Process Certification Scheme, which certifies the origin of the diamonds and does not deal in "conflict" or "blood" diamonds. CBI endorses the "No Dirty Gold" Golden Rules in which the extraction and mining of gold is conducted under conditions which meet social, human rights, and environmental standards.