Verification Assessment

COMPANIES: Hanesbrands  
COUNTRY: Honduras  
ASSESSMENT DATE: 11/27/17  
ASSESSOR: VeLar  
PRODUCTS: Apparel  

NUMBER OF WORKERS:

FLA Comments

This SCI is a verification assessment of assessment AA000000531. All corrective action plan updates for AA000000531 will be published on this report.
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

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation
1. Management does not have a policy for Recruitment, Hiring & Personnel Development.
2. There are no written policies or procedures that would encourage workers to undergo ongoing training to broaden their skills in order to advance their careers in the factory.
3. There are no written policies or procedures for conducting performance reviews, including the steps/process for job assessment and promotional opportunities.
4. Workers do not receive a copy of the information that is covered during orientation.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1.1, ER.15.3, ER.25.1, ER.28.1, ER.29.1, and ER.30.2)

VERIFICATION RESULT

Finding Status
Not Remediated

Remediation Details
1. Finding Status: Remediated
Explanation: The factory has developed written policies for Recruitment, Hiring & Personnel Development which are communicated to employees and cover all worker types.
2. Finding Status: Remediated
Explanation: Management has implemented several study programs for employees at different levels. Management also encourages the workers to finish high school and to continue to pursue professional careers qualifications.
3. Finding Status: Partially Remediated
Explanation: Even though management evaluates employee performance, performance reviews only happen when personnel apply for new positions as part of the application profile. Vacancies are filled only with personnel who apply for the positions. [ER.29]
Root Causes: The factory has not considered it necessary to evaluate performance on a regular basis as all employees are eligible to apply for all job vacancies.
4. Finding Status: Not Remediated
Explanation: The workers do not receive a copy of the information covered during orientation. [ER.15.3]
Root Causes: Management considers that the actual training method is enough to keep employees updated about all facility information.
COMPANY ACTION PLANS

Action Plan no 1.

Description

3. In facilities like the ones we have with over 2000 sewing operators, it is not doable to implement individual performance reviews like the ones suggested by the FLA. We have our own performance evaluations in place and these were shown to the auditors during the assessment process.

4. Pending review information of the induction with the union to standardized and start printing and handing out handbooks and internal workplace rules.

PREVIOUS FINDING NO.2

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Compensation

Finding Explanation
1. During 2013, most workers were not provided the legally required vacation days. Based on their seniority, all employees with 2 or more years of service are entitled to 12 - 20 paid vacation days. However, the factory only provided 10 vacation days to the entire workforce. Occasionally, a few workers that requested it were allowed additional days. Almost 99% of the workforce has more than 1 year of service within the factory.
2. Management has not made sufficient efforts towards communication and training to ensure workers understand the calculation of fringe benefits, including: vacation days, Christmas bonus, Fourteenth bonus, etc.

Local Law or Code Requirement
Labor Code, Article 346; FLA Workplace Code (Employment Relationship Benchmarks ER.15.2 and ER.22; Hours of Work Benchmarks HOW.1.1 and HOW.11; Compensation Benchmarks C.17.1 and C.17.1.3)

Recommendations for Immediate Action
1. Ensure that all workers rest for the vacation period that is legally required, based on their seniority.

VERIFICATION RESULT

Finding Status
Not Remediated

Remediation Details
1. Finding Status: Not Remediated
Explanation:
As of 2017, the same practice prevails. Employees with two or more years of service are entitled to 12 - 20 paid vacation days. However, the factory only provided ten vacation days to the entire workforce. Occasionally, a few workers who requested it were allowed additional days. Almost 90% of the workforce has more than one year of service within the factory. Although no workers who request extra days were denied, it is not common for employees to request additional vacation days. [ER.22, HOW.11]
Root Causes:
1. The factory’s production plan does not include safeguards to ensure that workers are allowed all the vacation days they are entitled to, based on their seniority.
2. As a way to increase their income, workers may seek to work during the vacation days they are entitled to.
2. Finding Status: Not Remediated
Explanation:
Management fails to make sufficient efforts towards communication and training in all employment functions to ensure workers have fully comprehension on what is being taught. All trainings are delivered through audio trainings broadcast through speakers during
Root Causes:
1. Management considers their training method to be effective.
2. Management stated that it is too complicated to train through other methods due to the size of the workforce.

**Local Law or Code Requirement**
FLA Workplace Code (Employment Relationship Benchmarks ER.15.2 and ER.22; Hours of Work Benchmark HOW.11; Compensation Benchmark C.17)

**Recommendations for Immediate Action**
1. Ensure that all workers rest for the vacation period that is legally required, based on their seniority.

**COMPANY ACTION PLANS**

**Action Plan no 1.**

**Description**
1. Employees have voluntarily opted to work some of their paid vacation days, but they always have the option of taking the days off whenever they request them.

2. Employees are trained on compensation and benefits once a year, and they have been trained to go to HR and payroll if there is a doubt.

**PREVIOUS FINDING NO.3**

**SUSTAINABLE IMPROVEMENT REQUIRED**

**FINDING TYPE:** Compensation

**Finding Explanation**
1. Factory does not have a legally required childcare facility on site for children below the age of seven; there are more than 30 female workers who are mothers of children younger than seven years old.

**Local Law or Code Requirement**
Law of Equal Opportunities for Women, Article 59; Labor Code, Article 140, Section 4; FLA Workplace Code (Nondiscrimination Benchmark ND.8.1)

**Recommendations for Immediate Action**
1. Management should consider the creation of a childcare facility nearby that is consistent with local regulations. Furthermore, management should also consider the creation of a mechanism to foster dialogue with industry associations, government institutions, workers’ advocacy groups and other stakeholders to develop strategies to facilitate compliance with this regulation.

**VERIFICATION RESULT**

**Finding Status**
Remediated

**Remediation Details**
1. Finding Status: Remediated

Explanation:
The factory has made an agreement with a private childcare facility which is not inside the industrial park for safety reasons and employees pay 1USD and the company pays 2USD per day for child. There were 257 parents working at the factory using the childcare facility at the time of the assessment.
PREVIOUS FINDING NO.4

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Hours of Work

Finding Explanation
1. Despite factory management having different documents regulating various aspects of working hours, there is not an integrated written policy on Hours of Work.
2. Some employees begin working before the designated starting time. On average, workers can begin working 15 - 40 minutes early. Additionally, not all workers rest the entire 15-minute morning break and 30-minute lunch break. This overtime is not registered and compensated as such.
3. Thirty temporary weekend-shift employees from embroidery do not have time cards to register starting and ending time; working hours are manually registered, lacking a reliable system to track work time.

Local Law or Code Requirement
Labor Code, Articles 319, 320, and 326; FLA Workplace Code (Employment Relationship Benchmarks ER.1.1, ER.23.1, and ER.23.3; Hours of Work Benchmarks HOW.1 and HOW.3)

Recommendations for Immediate Action
1. Ensure that workers do not work before the designated starting time. Otherwise, register and pay such time as overtime.
2. Ensure that all workers enjoy full morning and lunch breaks. Otherwise, register and pay such time as overtime.

VERIFICATION RESULT
Finding Status
Not Remediated

Remediation Details
1. Finding Status: Remediated
   Explanation: The factory now has an integrated written policy on hours of work.
2. Finding Status: Not Remediated
   Explanation: Some employees still begin work before the designated starting time. On average, workers still begin working 15-40 minutes early. Additionally, not all workers rest for the entire 15-minute morning break and the 30-minute lunch break. This overtime is not registered and compensated as such. Approximately 50% of the interviewed workers stated that they begin work before their designated start time and work during the breaks. [ER.23, HOW.3]
   Root Causes: In order to reach the highest production bonus', workers prefer to start working before the designated time and to continue working during their breaks without management's approval or interference. In order to start working promptly on the established schedule, employees are required to arrive earlier as a buffer.
3. Finding Status: Remediated
   Explanation: Embroidery employees register time in/out through a biometrical fingerprint system.

Local Law or Code Requirement
FLA Workplace Code (Employment Relationship Benchmark ER.23; Hours of Work Benchmark HOW.3)

Recommendations for Immediate Action
1. Ensure that workers do not perform work before the designated starting time. Otherwise, register and pay such time as overtime.
2. Ensure that all workers enjoy full morning and lunch breaks. Otherwise, register and pay such time as overtime.

COMPANY ACTION PLANS
Action Plan no 1.

Description

1. Management practices are being implemented to better control employees break hours. Procedure is in place to control compressed air during breaks. Machines are not operative during breaks.

PREVIOUS FINDING NO.5

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Industrial Relations

Finding Explanation

1. The factory does not have industrial relations policies and procedures for Freedom of Association.
2. There has not been any communication about industrial relations policies and procedures to workers, supervisors, or managers. Also, an industrial relations policy is not included in the new hire orientation. (Factory does not have a union or a collective bargaining agreement.)

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1.1, ER.1.2, and ER.1.3)

VERIFICATION RESULT

Finding Status
Remediated

Remediation Details
1. Finding Status: Remediated
Explanation:
The factory has created industrial relations policies and procedures for freedom of association.
2. Finding Status: Remediated
Explanation:
Supervisors, workers and managers have been trained on the industrial relations and freedom of association policies, and the introductory material for new hires includes this information.

PREVIOUS FINDING NO.6

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Workplace Conduct & Discipline

Finding Explanation

1. Factory does not have a disciplinary policy.
2. The workers' right to appeal disciplinary actions is not included in the procedures.
3. Workers do not receive a copy of the workplace rules during orientation.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1.1, ER.15.3, and ER.27.4)

VERIFICATION RESULT

Finding Status
Not Remediated
Remediation Details
1. Finding Status: Remediated
Explanation: The site now has a disciplinary policy. The workers and supervisors have been trained on the policy. Interviewed workers were aware of the policy.
2. Finding Status: Remediated
Explanation: Based on documentation review and worker interviews, the disciplinary procedures include the right to appeal any disciplinary actions.
3. Finding Status: Not Remediated
Explanation: The workers still do not receive a copy of the workplace rules during orientation. [ER.15.3]
Root Causes: Management does not think they need to deliver a copy of the workplace rules to each worker as they have posted the rules around the workplace in the different working areas.

Local Law or Code Requirement
FLA Workplace Code (Employment Relationship Benchmark ER.15.3)

COMPANY ACTION PLANS

Action Plan no 1.
Description
3. Pending review information of the induction with the union to standardized and start printing and handing out handbooks and internal workplace rules.

PREVIOUS FINDING NO.7

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Grievance System

Finding Explanation
1. There is no policy on Grievance System that outlines the factory’s principles and rules, commitment to transparency, confidentiality, and fair treatment.

Local Law or Code Requirement
FLA Workplace Code (Employment Relationship Benchmarks ER.1.1 and ER.25.2)

VERIFICATION RESULT

Finding Status
Remediated

Remediation Details
1. Finding Status: Remediated
Explanation: The factory now has a Grievance System which outlines a commitment to transparency, confidentiality, and fair treatment. The system also ensures confidentiality and ensures non retaliation. Employees are aware of the system and use it frequently for different queries.

PREVIOUS FINDING NO.8

IMMEDIATE ACTION REQUIRED
Finding Explanation
1. The Health & Safety policy does not include a commitment to comply with local law.
2. The factory's Health, Safety & Environment (HSE) procedures are missing the following elements: a) measures to protect workers' reproductive health, b) a process for workers to raise concerns, c) commitment to protect workers who raise concerns from retaliation.
3. Material Safety Data Sheets (MSDS) are missing for chemicals in use at 2 stain removal areas of Plant 54A and Plant H1.
4. Instructions for the use of the eyewash facility are missing at a stain removal area in Plant 54A. Additionally, instructions for the use of the eyewash facility are in English at the stain removal area of Plant H1, although the workers' native language is Spanish.
5. A trashcan at the Plant 54A canteen was not equipped with a legally required lid.

Local Law or Code Requirement
Labor Code, Article 16; General Regulations on Preventive Measures of Accidents and Illness at the Workplace, Article 67, Section 2; FLA Workplace Code (Employment Relationship Benchmarks ER.31.2.4 and ER.31.2.6; Nondiscrimination Benchmark ND.8.1; Health, Safety & Environmental Benchmarks HSE.1, HSE.2, and HSE.10.1)

Recommendations for Immediate Action
1. Ensure that MSDS for all chemicals in use at stain removal areas are available in the workers' native language.
2. Post Spanish instructions for the use of the eyewash facility in all stain removal areas.
3. Ensure all trashcans in the canteen are equipped with lids.

VERIFICATION RESULT
Finding Status
Remediated

Remediation Details
1. Finding Status: Remediated
   Explanation: The Health & Safety policy includes a commitment to comply with local laws.
2. Finding Status: Remediated
   Explanation: The factory's Health, Safety & Environment (HSE) procedures include the following elements: a) measures to protect workers' reproductive health; b) a process for workers to raise concerns; and c) a commitment to protect workers who raise concerns from retaliation.
3. Finding Status: Remediated
   Explanation: The Material Safety Data Sheets (MSDS) for all used chemicals are available in the required work areas.
4. Finding Status: Remediated
   Explanation: The instructions for the use of the eyewash facility are available in Spanish at the stain removal areas.
5. Finding Status: Remediated
   Explanation: The trashcan in the Plant 54A canteen is equipped with a legally required lid.
bundles. The assembly area for workers in Plant H1 is not marked.
4. The emergency exit is not marked in the canteen of Plant H1.
5. A forklift was not equipped with a fire extinguisher.
6. There is no "Not an emergency exit" sign at the unloading area.
7. The emergency alarm is not loud enough to be heard in all production areas in Plant H1 or the administrative offices in Plant 54A.
8. A stroboscopic light did not function in plant H1 when tested.
9. The emergency light did not turn on at the administrative offices in Plant 54A when tested by the assessors.

**Local Law or Code Requirement**

General Regulations on Preventive Measures of Accidents and Illness at the Workplace, Articles 103, 208, 217, and 220, Section 1; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.5.1, and HSE.5.3)

**Recommendations for Immediate Action**

1. Mark production floor with yellow diagonal lines, under each fire extinguisher and electrical panel as a way to prevent blockage of access.

2. Mark evacuation routes on the floor using arrows in the production areas of Plants 54A and H1, and ensure that all aisles are not blocked.

3. Mark assembly area at Plant H1.

4. Mark the emergency exit at the canteen of the Plant H1.

5. Retrofit all forklifts with fire extinguishers.

6. Post a sign that states, "Not an emergency exit" at raw material warehouse.

7. Ensure that the emergency alarms can be heard throughout Plants 54A and H1.

8. Replace burnt alarm speaker and consider installing additional ones in different areas of Plant H1 and 54A, especially close to the administration offices.

9. Replace burnt stroboscopic light and install additional ones at both plants and where needed.

10. Connect appropriate voltage regulators to the emergency evacuation and alarm systems.

**VERIFICATION RESULT**

**Finding Status**
Remediated

**Remediation Details**
1. Finding Status: Remediated
   Explanation: During the facility tour, the assessors verified that there are markings on the floor.

2. Finding Status: Remediated
   Explanation: The markings on the floor were clearly visible during the facility tour.

3. Finding Status: Remediated
   Explanation: The assessors did not observe any blocked aisles during the facility tour. The assembly area for workers at Plant H1 was properly marked.

4. Finding Status: Remediated
   Explanation:
The emergency exit in the canteen of Plant H1 is now marked.

5. Finding Status: Remediated
Explanation:
The forklifts are now equipped with fire extinguishers.

6. Finding Status: Remediated
Explanation:
The unloading area now has a "Not an emergency exit" sign equipped.

7. Finding Status: Remediated
Explanation:
The emergency alarm test was verified during the document review. The alarm could be heard in all production areas and administrative offices.

8. Finding Status: Remediated
Explanation:
Based on a document review, the assessors verified the maintenance of stroboscopic lights.

9. Finding Status: Remediated
Explanation:
The emergency lights were observed to be fully functional during the facility tour.

PREVIOUS FINDING NO.10

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Communication & Worker Involvement (Macro)

Finding Explanation
1. The Worker Integration component is missing from all Employment Functions. The factory does not have policies and procedures to receive worker input/feedback on the creation, implementation, and revision of its policies and procedures. Also, workers are neither systematically integrated nor consulted in the decision-making processes.

Local Law or Code Requirement
FLA Workplace Code (Employment Relationship Benchmarks ER.1.3 and ER.25.2)

VERIFICATION RESULT

Finding Status
Remediated

Remediation Details
1. Finding Status: Remediated
Explanation:
The factory has implemented different communication and participation programs, (e.g., roundtables with management representatives, suggestion boxes, hotline, feedback via computer) . These programs facilitate worker input on the creation, implementation, and revision of policies and procedures. The responses to the feedback are shared on a monthly basis. Workers are aware of and utilize these programs.

COMPANY ACTION PLANS

Action Plan no 1.

Description
10.1 a. There was no one working in the generator room, the electricans only entered the room when they maintained the generator. If the electrician maintains the generator inside, then the door would be opened as exit door. b. To prevent the argument about the lock of doors for generator room again, factory has removed the locker. To ensure the safety of these areas, have assigned one security guard to check who enter these areas and keep records on checklist during the working hours.

10.2 The fire hoses blocked area are all improved, the factory will also ask HSE team to conduct check to prevent the same issue happened.
10.3 Factory has asked the canteen workers to close gas valves when they are not using it.

10.4 Factory has kept the packed goods in suitable distance to electric wires and walls to prevent fire risk.

10.5 Factory has repainted the exit arrows.

10.6 Factory has conduct fire drill for worker in shift 2 on Dec, 2017.

10.7 Factory will asked qualified supplier to conduct sprinklers checking when next time annual checking.

10.8 Factory has announced to all workers not smoking in the restroom. If they want to smoke, they should go to cigarette station.

10.9 Factory has posted non-smoking signs in the break room for the cleaners in the canteen.

PREVIOUS FINDING NO.11

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Training (Macro)

Finding Explanation
1. Workers are not provided ongoing training for the following Employment Functions: Recruitment, Hiring & Personnel Development and Termination & Retrenchment.
2. The factory does not provide specific training for supervisors on Termination & Retrenchment.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1.2, ER.15.2, ER.17.1, and ER.17.3)

VERIFICATION RESULT

Finding Status
Partially Remediated

Remediation Details
1. Finding Status: Partially Remediated
Explanation: While training are delivered frequently, the method is not very effective and does not ensure employees are retaining information based on worker interviews.
2. Finding Status: Remediated
Explanation: The factory now provides specific trainings to supervisors on termination and retrenchment policies and procedures.

COMPANY ACTION PLANS

Action Plan no 1.

Description
We will continue with our training program and we are exploring methods to evaluate employee retention of information. Yearly trainings are being given to employees.
PREVIOUS FINDING NO.12

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Communication & Worker Involvement (Macro)

Finding Explanation
1. Workers do not receive ongoing or regular communication for the Employment Functions of Recruitment, Hiring & Personnel Development and Termination & Retrenchment.

Local Law or Code Requirement
FLA Workplace Code (Employment Relationship Benchmark ER.1.2)

VERIFICATION RESULT

Finding Status
Remediated

Remediation Details
1. Finding Status: Remediated
Explanation:
The workers are given regular communication on all employment functions through audio broadcasts on production floors.

PREVIOUS FINDING NO.13

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Review Process (Macro)

Finding Explanation
1. There is no review process in place for some Employment Functions as no policies and procedures have been developed for them. This is the case for Recruitment, Hiring & Personnel Development, Hours of Work, Termination & Retrenchment, Industrial Relations, and Workplace Code & Discipline.

Local Law or Code Requirement
FLA Workplace Code (Employment Relationship Benchmarks ER.1.3, ER.29.1.1, and ER.30.2)

VERIFICATION RESULT

Finding Status
Remediated

Remediation Details
1. Finding Status: Remediated
Explanation:
The factory has implemented a review policy for all documentation, policies, and procedures.

New Findings and Action Plans

NEW FINDING NO.1

SUSTAINABLE IMPROVEMENT REQUIRED
FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation
1. The employment application requests information related to applicant’s age, marital status, and gender, which poses a risk of discrimination during the recruitment process. Although there is no evidence that such information is requested with a discriminatory intent, the factory management should not collect this data until the applicant has been hired. [ER.3]

Local Law or Code Requirement
FLA Workplace Code (Employment Relationship Benchmark ER.3)

COMPANY ACTION PLANS

Action Plan no 1.

Description
These is statistical information that it is recollected for data management purpose and as verified by the auditors is not been used as a reason not to be hired or discrimination intent. Gender and marital status removed from the application form.

NEW FINDING NO.2
IMMEDIATE ACTION REQUIRED
FINDING TYPE: Compensation

Finding Explanation
1. The workers who are members of the Emergency Brigade receive trainings on Fridays. Their regular work schedule is Monday to Thursday. As a result, members of the brigade are not compensated for their training time. [C.3, C.5]

Local Law or Code Requirement
FLA Workplace Code (Compensation Benchmarks C.3 and C.5)

Recommendations for Immediate Action
1. Retroactively compensate workers for the unpaid trainings. Ensure that workers are paid for attending trainings going forward.

COMPANY ACTION PLANS

Action Plan no 1.

Description
Since January 2018 Trainings that are scheduled on Fridays or outside of the work day, are paid as extra time.

NEW FINDING NO.3
IMMEDIATE ACTION REQUIRED
FINDING TYPE: Health & Safety

Finding Explanation
1. A falling ceiling requires maintenance in several areas in Sewing Area 54. [HSE.13]
2. The extractor in the kitchen adjacent to Sewing Area 54 requires maintenance. [HSE.14]
3. The fire detectors have not yet been installed on the second-floor of the supply warehouse. [HSE.5, HSE.6]
4. The evacuation map is not posted in the embroidery area. [HSE.5]
5. The embroidery area evacuation route does not lead to a formal meeting area. [HSE.5]
6. The chairs that the workers use in the maintenance area do not have back support. [HSE.17]

**Local Law or Code Requirement**

General Regulations on Preventive Measures of Accidents and Illness at the Workplace, Articles 103, 208, 217, and 220, Section 1; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.5.1, HSE.7, HSE.8, HSE.13, HSE.14, and HSE.17)

**Recommendations for Immediate Action**

1. Repair the damaged ceiling in Sewing Area 54.
2. Install fire detectors in the second-floor of the supply warehouse.
3. Revise the evacuation route in the embroidery area to ensure that it leads to a formal meeting area.
4. Post the evacuation map in the embroidery area.

**COMPANY ACTION PLANS**

**Action Plan no 1.**

**Description**

1. Ceiling was replaced, a monthly revision will be made by maintenance.
2. A new extractor was installed, and a monthly revision will be made by maintenance.
3. Fire detectors will be installed on H1 second floor.
4. Evacuation Map was installed in the embroidery area.
5. Meeting point was defined, and new signs will be installed.
6. Chair that was found in the maintenance area was been repaired, all working chairs in the maintenance area have back support.

**NEW FINDING NO.4**

**SUSTAINABLE IMPROVEMENT REQUIRED**

**FINDING TYPE: Compensation**

**Finding Explanation**

1. The compensation procedure was last updated in 2015. According to review guidelines, this should be annually reviewed/updated. In addition, new policies have been adopted that require procedure to be updated accordingly.

**Local Law or Code Requirement**
COMPANY ACTION PLANS

Action Plan no 1.

Description

Once all the new compensation policies and procedures are deployed we will ensure revisions are made accordingly.