

FLA Code/Compliance Issue	Findings					Remediation		Verification		Remediation		Status			
	Legal Reference	FLA Benchmark	Monitor's Findings	Documentation	PC Remediation Plan	Target Completion Date	PC Follow Up (April 2004)	Documentation	External Verification (March 29-30, 2010)	Notable Feature	PC Remediation Plan		Target Completion Date	Company Follow Up (FACTORY?)	Documentation
Others			The noise was very high and there was no instrument or machine which [calculated the decibel level].		PC to direct factory to maintain noise level below 85 decibels and instrument to be kept available to measure sound levels whenever required.	10-Apr-04	Completed: Noise level measuring instrument available, but by mistake was not brought in time for the audit team to measure. Noise level on production floor is below 85 decibels, except at embroidery room where earplugs are already provided.		Ongoing: Noise level near generator room adjoining childcare center found to be very high. There was no noise measuring device installed in this area.		Ensure workers are aware of high noise areas. Steps should be taken to reduce noise and use proper PPE where applicable.	by July 2010	1) Installed duct system to channel noise upward; plan to reduce further with help from consultant engineers. 2) High noise areas in factory have been mapped. Visual copy of those that have been posted in all high noise areas, including generator room. 3) PPE usage instructions have been posted in all high noise areas, including generator room.		Completed
7. Freedom of Association and Collective Bargaining		Employers shall comply with all local laws, regulations and procedures concerning freedom of association and collective bargaining.							New Finding: Number of members in WRWC for both facilities of Factory named found to be less than the expected number as per the BEPZA regulation. (6 at Factory name) and 2 at Factory name. #2). 3) members of WRWC have become supervisors and continue to be WRWC members. No capacity building input, such as training, have been provided to the WRWC members since their inception.		1) New Law does not have any provision of re-election or replacement. 2) Meanwhile, existing WRWC members should be given proper capacity building training so that they can communicate workers issues to management properly. 3) Focus should be given on workers' voice and that concerns are timely heard.	We shall follow BEPZA guidelines	1) Factory disagrees with finding, because there is no replacement provision in act, there is no stipulation that promotions after elections automatically disqualify members. 2) We held 3 members in question (as elected members) should not be penalized for being promoted. WRWC capacity building training is an ongoing process, we are meeting weekly since March 2008, having 1 hour sessions every week, including HR Head, Compliance Head and all counselors.	photos from training on industrial relations capacity building sent to FLA for review	Ongoing
Right to Freely Associate		Workers will have the right to establish and, subject only to rules of organization concerned, to join organizations of their own choosing without previous authorization. The right to freedom of association begins at the time that a worker seeks employment, and continues through course of employment.	Association in form of union is [not allowed] in [****]. There is a provision for formation of Worker Welfare Committee (WWC) in factory since 2001. Factory management has formed a WWC, but found [it] functioning poorly.		PC to direct factory to take the necessary steps for WWC to be effective and function properly.		Necessary steps have been taken to make WWC more effective. Regular monthly meetings and posting minutes of those meetings at all notice boards have been done to improve communication of information for understanding of general workers. Attachments regarding WWC meeting minutes sent for review.		Ongoing: Present composition of WRWC is 8 vs. expected 26 members and 3 out of 8 members are supervisors now after 5 years on continuous term.		Workers should not be in any way restricted, to form or join association of their own choice.	We shall follow BEPZA guidelines	Kindly see above.		Ongoing
Grievance Procedure		Employer shall have in place written grievance procedures that allow first an attempt to settle grievances directly between the worker and the immediate supervisor but that, where this is inappropriate or has failed, it is possible for the worker to have the grievance considered at one or more steps, depending on the nature of the grievance and the structure and size of the enterprise. Employers shall ensure that the grievance procedures and applicable rules are known to workers.							New Finding: Worker grievances not formally documented along with follow-up actions taken on the grievance. Further, resolution of grievances are not communicated back to workers. Workers' grievances are presently documented by the 8 counselors in their diary informally, and not translated into formal documents to be able to analyze trends of grievance reported. Found that counselors are not regularly reporting to their managers on this subject.		1) All grievances of all workers should be timely reported to applicable management. 2) Enforcement of periodical reporting to Compliance and HR Department by counselors. 3) Refresher training on grievance handling to counselors.	30-Sep-10	1) Disagree, because factory counselors are continuously resolving grievances on daily basis. They are set up as independent body, but they do make periodical reports to compliance and HR Departments both verbally and in writing - in addition to their daily diary entries. 2) Management has 2 communication channels, 1 is through counselors, the other through HR Officers. 3) Refresher trainings on grievance handling policies and grievance procedures being given for workers, management, and counselors followed by evaluation of understanding of participants. 4) A total of 666 workers given training on grievance procedure during last 3 months. 5) Eventually, 100% of workers have been trained on grievance procedure. 6) All training sessions followed by evaluation of workers' understanding. 7) Revised edition of Workers' Handbook is under process of printing and would be distributed shortly.		Ongoing
8. Wages and Benefits															
Time-Recording System		Time worked by all employees, regardless of compensation system, will be documented by time cards or other accurate and reliable recording systems, such as electronic wage cards.	We have reviewed 125 records **** and they were used in calculating payroll (Of those, a) significant number of time records, for those employees who do hazardous work and daily laborers, were not properly	workers' time cards, payroll sheets	PC to direct factory to maintain complete time records for those who are involved in daily labor and hazardous work.	10-Apr-04	Completed: Time records for daily laborers and those working at hazardous jobs being maintained and updated.		Completed: On March 29, 2010, there were 60 daily laborers. Time records for daily laborers and those working in hazardous jobs was being maintained and updated.						
Legal Benefits		Employers will provide all legally mandated benefits to all eligible workers.	A significant number of daily laborers who do hazardous job in the factory, did not get **** legally mandated benefits, (such as) 1 year's festival bonus, provident fund, leave and medical facilities.	workers' time cards, payroll sheets	PC to direct factory to provide legally mandated benefits to all employees including daily laborers.	10-Apr-04	Completed: Per legal mandate, festival bonus and provident fund applies only to permanent workers. However, medical facilities are open to all workers.		Completed: According to management and record review, daily wage workers paid legally mandated wage and subsidized lunch. 60 workers reported on day of audit and none of the workers exceeded work for more than 1 month. Per BEPZA regulation, festival bonus does not apply for these workers as they need to complete a minimum of 6 months of service. Per management policy, workers who have not completed a month are not eligible for provident fund benefit.						
9. Hours of Work															
10. Overtime Compensation															
Miscellaneous															
Personnel Records			Factory does not have any central system or separate recognized recording system to maintain individual files of daily laborers, working on a daily basis.	workers' personnel files	PC to direct factory to maintain central listing and personnel files for all daily laborers.	20-Apr-04	Completed: Central listing for daily/casual laborers is being maintained. At times, central listing may not be 100% accurate due to turnover in casual/daily labor workforce.		Completed: Updated information available on daily laborers with HR Department.						

