FLA Audit Profile Country Factory name IEM Organization Date(s) in facility PC(s) Number of workers Product(s) Production processes	China120015509EA.L.G.I.December 25-26, 2006Reebok International, Ltd.479Shoe solesBlending, Injection, Cooling, Checking, Curing, Trimming						
FLA Code/Compliance Issu	e Country Law/Legal Reference	FLA Benchmark	Noncompliance	Risk of Noncompliance	IEM Findings Evidence of Noncompliance (Uncorroborated)	If not corroborated, explain why	De
 Code Awareness Forced Labor There will not be any use of for 	rced labor, whether in the form of prison labor, indentured labor, bonded labor or othe	rwise.			(oncorroborated)		
Policy		FLA Benchmark		No policy regarding Forced Labor			Mar
	t an age younger than 15 (or 14 where the law of the country of manufacture allows) on the such age is higher than 15.	r younger than the age for completing compulsory education in		No policy regarding			Mar
				Child Labor			
4. Harassment or Abuse Every employee will be treated Policy	d with respect and dignity. No employee will be subject to any physical, sexual, psy	chological or verbal harassment of abuse. FLA Benchmark		No policy regarding Harassment or Abuse			Mar
	ny discrimination in employment, including hiring, salary, benefits, advancement, disc I orientation, nationality, political opinion, or social or ethnic origin.	cipline, termination or retirement, on the basis of gender, race,		No policy regarding			Mar
Folicy				Nondiscrimination			
6. Health and Safety Employers will provide a safe of the operation of employer fa Evacuation Procedure	Art. 14.3 of PRC Fire Prevention Law: Enterprises shall carry out fire prevention	All applicable legally required or recommended elements of	1) 1 stairwell in Building B was used				Fac
	characteristics of the employing unit. Art. 14.6 of PRC Fire Prevention Law: Keep the evacuation passages and exits		as maintenance room. 2) Facility did not have evacuation map posted in warehouse of Building A. 3) No exit sign and emergency light were installed in warehouse of Building A.				
Safety Equipment	Art. 31 of PRC Factory Safety and Sanitary Regulations: First aid kits must be available in working areas.		Building A blocked. 2) 9 fire				Fac
	 Art.14.5 of PRC Fire Prevention Law: The company should maintain fire fighting facilities and equipment and fire safety signs in accordance with State regulations; company must also check and maintain equipment regularly to ensure they are in working condition. Art. 43 of Fire prevention and safety rules of Textile mills: Obstructive items such as sundry goods or other items must not be piled up around the fire extinguishers or fire hydrants. Art. 5.1.1 of Design Regulations for Installation of Fire Extinguisher (GBJ 140-90): Fire extinguishers shall be installed in noticeable and accessible locations and shall not be obstructive during safety evacuation. Art. 5.1.3 of Design Regulations for Fire Extinguisher Installation (GBJ 140-90): Portable fire extinguisher shall be installed in such a way that height from top of extinguisher to floor shall be no less than 0.15m. Art. 4.0.7 of Design Regulations for Fire Extinguisher Installation (GBJ 140-90): There shall be no less than 2 fire extinguishers in a fire extinguisher-equipped location; there should not be more than 5 fire extinguishers in each location. 		extinguishers in Building A, 25 fire extinguishers in Injection Department of Building B and 1 fire extinguisher in Boiler Room were placed on ground. 3) 1 fire extinguisher on 1st floor of Building A and 1 fire extinguisher in Building B were out of service. 4) No first aid kit observed in Building A. 5) In Building B, facility only has 1 first aid kit in office on 2nd floor. This first aid kit was locked and only 1 person has the key.				
Chemical Management	Art. 19 of Regulations on Safe Use of Chemicals in the Workplace: the facilities used to hold, transport and store hazardous chemicals shall be highlighted with colors, scutcheons or labels and indicate its fatalness. Art. 20 of Regulations on Safe Use of Chemicals in the workplace: The information concerning health and safety when utilizing hazardous chemicals shall be open to the employees. And the employees shall be trained to recognize safety labels, understand technical directions and master necessary means to deal with emergency and save themselves. Besides, there shall be regular training on how to use chemicals safely in the workplace. Art. 60 of PRC Factory Safety and Sanitary Regulations: Poisonous and hazardous goods shall be stored at specific locations separately, and shall be managed with stringency.	All chemicals and hazardous substances should be properly labeled and stored in accordance with applicable laws. Workers should receive training, appropriate to their job responsibilities, in the safe use of chemicals and other hazardous substances.	1) 8 bottles of chemicals were found stored without MSDS in maintenance shop. 2) Chemical storage room located on 1st floor of Building A has no sign or warnings.				Fac
Sanitation in Facilities	dressing rooms, retiring rooms and female sanitary rooms as required. The	All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with applicable laws.	Canteen does not have sanitary permit and 5 canteen workers' health certificates have expired.				Doc mar
7. Freedom of Association a	aforementioned restrooms and other facilities should be maintained regularly to keep them clean and functional.						
Employers will recognize and Freedom of Association	respect the right of employees to freedom of association and collective bargaining	FLA Comment: The Chinese constitution guarantees Freedom of Association; however, Trade Union Act prevents establishment of trade unions independent of sole official trade union – All China Federation of Trade Unions (ACFTU). According to the ILO, many provisions of Trade Union Act are contrary to the fundamental principles of freedom of association, including non-recognition of the right to strike. As a consequence, all factories in China fall short of ILO standards on right to organize and bargain collectively. Recently, however, the government has introduced new regulations that could improve the functioning of labor relations mechanisms. Amended Trade Union Act of October 2001 does stipulate that union committees have to be democratically elected at members' assemblies and trade unions must be accountable to their members. Trade union has the responsibility to consult with management on key issues of importance to their members and to sign collective agreements. It also grants trade union an enhanced role in dispute resolution. In December 2003, Collective Contracts Decree introduced the obligation for representative trade unions and employers to negotiate collective agreements, in contrast to previous system of non-negotiated administrative agreements.					
Policy		FLA Benchmark		No policy regarding Freedom of Association			Mar
	ges are essential to meeting employees' basic needs. Employers will pay employees whichever is higher, and will provide legally mandated benefits Art. 72 of PRC Labor Law: Management and employees must participate in	, as a base, at least the minimum wage required by local law or Employers will provide all legally mandated benefits to all	As per social insurance receipt for				Doc
	social insurance programs.	eligible workers.	October, September and August, 197 workers are not registered for pension, medical and unemployment insurance. All workers are registered for Occupational Injury Insurance.				mar
Accurate Recording of Wage Compensation 9. Hours of Work		All hourly wages, piecework, bonuses, and other incentives will be calculated and recorded accurately.		No time record for security guards. There is a risk of miscalculation of working hours and wages.			Doc
Except in extraordinary busine on regular and overtime hours	ess circumstances, employees will (i) not be required to work more than the lesser of allowed by the law of the country of manufacture or, where the laws of such country e; and (ii) be entitled to at least one day off in every seven day period. Art. 41 of PRC Labor Law: Employees should not be allowed to work more than 3 overtime hours per day and 36 overtime hours per month. Art. 38 of PRC Labor Law: Employer shall guarantee that its laborers have at least 1 day off per week.	Except in extraordinary business circumstances, employees will (i) not be required to work more than the lesser of (a) 48					Doc
Other/ Day of Rest			In May, March and August, records showed workers (different ones on different occasions) worked for more than 7 days in a row without a rest day. In the case of security guards, according to shift arrangement records for November and December all of them had 1 day off after working for 15 consecutive days.				Doc
	n ion for regular hours of work, employees will be compensated for overtime hours at su tries where such laws will not exist, at a rate at least equal to their regular hourly cor	npensation rate.	As per cross checking between time records and payroll, in October, all workers' OT hours used in calculation of payroll were 1 hour less than actual OT hours worked.				
Miscellaneous Security Guards Certificate	Art. 3 of Determination Made by the Ministry of Public Security on Consolidating the Industry of Security Guards: The security guards should have the occupational licenses issued by the	FLA Benchmark	13 out of 17 security guards have mandated certificates.				Doc mar
	department of public security and registered with the local police station.						

	Noncompliance Risk of Noncompliance	IEM FindingsEvidence of Noncompliance (Uncorroborated)If not corroborated, explain whySources, Documentation used for corroboratingNotable Features implemented by Factory	Internal Co	RemediationTargetFactoryCompany Follow UpCompletionResponse (March 29, 2007)Date(Optional)	[Status]DocumentationCompleted, Pending, Ongoing		Status] Updates (Cite Date of Follow Up) Documentation Company Follow Up Opdates (April 2, 2008) Documentation Company Follow Up ending, ngoing	[Status]Updates (Cite Date of Follow Up)[Status]completed, Pending, OngoingCompany Follow Up (February 16, 2009)Documentation Pending, OngoingCompleted, Pending, OngoingCompleted, Pending, OngoingCompleted, Pending, OngoingCompleted, Pending, Ongoing	Updates (Cite Date of Follow Up)[Statepany Follow UpDocumentation(July 2009)	Updates (Cite Date of Follow Up Company Follow Up (July 2010) Doc) [Status] Third-Party cumentation Completed, External Pending, Verification Ongoing (Date)	Verification Company Verification Documentation Company Follow Doc Up Up Doc
	No policy regarding Forced Labor	Management Interview	Factory has had a workers' handbook which contains the basic content of the existing forced labor policy since before IEM took place. PC's compliance team verified during March	30-Apr-07 Workers' handbooks are distributed to all employees and new workers are trained before signing the labor contract. Also, Reebok Human Rights Production	forced	didas new Workplace Standards containing ed labor policy are posted on notice boards in prominent places around factory. 2) workers/manageme	pleted					
			2007 audit that the handbook was issued in August 2003. Yet, factory must reinforce and communicate to all managers, supervisors and workers about forced labor policy again.	Standards, which contains forced labor policy, are posted in prominent places around Buildings A and B.	Every which forced who v	ry worker holds a copy of the handbook ch contains an explanation on the existing ed labor policy. 3) Workers and supervisor were interviewed indicated they know the ed labor policy.						
npulsory education in	No policy regarding Child Labor	Management Interview	1) Factory will add the basic content of child labor policy in workers' handbook accordingly. Factory will not recruit any worker who is below 16 years old. Workers' ages will be		handbook new v	Printing and distribution to workers of the version of the handbook has been and workers/manageme	sent out for printing on March 18, 2008, and reviewed and the handbook will be distributed to workers on workers/managem	ngoing 1) adidas new Workplace Standards containing forced labor policy are posted on notice boards and in handbook, training				
			verified by checking age documentation such as ID, education certificate, etc. 2) Personnel department will train all managers, supervisors and workers before signing the labor contract and will distribute the handbook which contains the child labor policy accordingly.		the ne distrib Facto of the	v will add updated organization system to new version of the handbook and then ribute to workers early September 2007. tory will conduct training on the new version he handbook, which will include the topic of d Labor Policy.	April 30, 2008. Top management has committed to conducting training for workers accordingly.	prominent places around the factory. 2) Every worker holds a copy of the handbook which contains an explanation of the existing forced labor policy. 3) Workers and supervisors who were interviewed				
								indicated they know the forced labor policy.				
	No policy regarding Harassment or Abuse	Management Interview	Factory has had a workers' handbook which contains the basic content of the existing harassment and abuse policy since before IEM took place. PC's compliance team verified	30-Apr-07 1) Factory has workers' handbook which contains basic content of harassment or abuse policy already in place. As per policy, Factory will not treat employees	Worker's handbook Completed							
			during March 2007 audit that the handbook was issued in August 2003. Yet, factory must reinforce and communicate to all managers, supervisors and workers about forced labor policy again.	with physical, sexual or verbal harassment or abuse. 2) There are effective systems of appeal and grievance in factory. 3) Workers' handbooks are distributed to all employees before signing labor contract. Also, Reebok Human Rights Production Standards, which contains								
				harassment or abuse policy is posted in prominent places around Buildings A and B.								
basis of gender, race,	No policy regarding Nondiscrimination	Management Interview	Factory has had a workers' handbook which contains the basic content of existing non-discrimination policy since before IEM took place. PC's compliance team verified during	basic content of nondiscrimination policy already in place. Factory recruits workers based on their working	Worker's handbook Completed							
			March 2007 audit that the handbook was issued in August, 2003. Yet, factory must reinforce and communicate to all managers, supervisors and workers about forced labor policy again.	skills or ability, not based on their race, gender, age, disability, marital status, etc. 2) Workers' handbooks are distributed to all employees before signing labor contract. Also, Reebok Human Rights Production Standards, which contains nondiscrimination policy is								
of work or as a result				posted in prominent places around Buildings A and B.								
ended elements of 1 ans, unblocked a ation procedures, etc.) n	1) 1 stairwell in Building B was used as maintenance room. 2) Facility did not have evacuation map posted in warehouse of Building A. 3) No exit	Factory Tour	maintenance room. 2) Evacuation map of warehouse in 2) 30-	30-Mar-071) Factory has moved all maintenance equipment out of the room and locked the door in stairwell of Building B. This does not block workers' access to evacuation routes. 2) Evacuation map of warehouse is posted in	Factory tour 1) Completed Evacu 2) Ongoing was u 3) Completed poste	cuation map of the warehouse in Building A Visual inspection Com updated with required information and ted in the correct place.	pleted					
es. s	sign and emergency light were installed in warehouse of Building A.		installed in warehouse of Building A. 4) Factory management must ensure that all evacuation routes/exits are properly maintained at all times by designating a responsible person to conduct periodic checks and ensure that all fire equipment (fire extinguishers, evacuation maps,	wrong place (the stairs of Building A), and content of evacuation map needs to be improved. Old map is missing the following information: actual location; location of alarms-audio and visual; location of alarm manual call points; assembly area. Factory must also								
			emergency lights) are provided and properly maintained at all times in all sections of the factory.	provide phone number of local fire department, ambulance and hospital. These will be added into the new map. 3) Each door has installed an exit sign and emergency light in warehouse of Building A.								
ed as prescribed and E e e	1) 1 fire extinguisher on 1st floor of Building A blocked. 2) 9 fire extinguishers in Building A, 25 fire extinguishers in Injection Department	Factory Tour	must be cleared up accordingly. Factory conduct daily/regular inspections to ensure all fire extinguishers are free from obstruction at all times; train workers accordingly.	obstruction free. 2) All fire extinguishers which were placed on ground have been adjusted accordingly. 3) 3 extinguishers in Buildings A and B are still out of	2) Completed and s3) Ongoing exting4) Completed	actory has purchased new fire extinguishers stored in security guard's area. All old fire nguishers will be replaced by end of August. visual inspection.	oing All old fire extinguishers have been replaced, no extinguishers found to be out of service during this audit. Visual inspection C	Image: sympleted price of the sympleted for all floors of Buildings A and B. First aid inspection records were well interview Completed for all floors of Buildings A and B. Inspection records were well maintained to ensure minimum stock interview Interview				
E 1 E E	of Building B and 1 fire extinguisher in Boiler Room were placed on ground. 3) 1 fire extinguisher on 1st floor of Building A and 1 fire extinguisher in Building B were out of service. 4) No first aid kit observed in Building		2) All fire extinguishers placed on ground must be adjusted to meet with relevant requirements. 3) Check all fire extinguishers in factory to ensure they are in good working condition; factory must conduct inspection regularly. Please maintain records on file indicating results of monthly extinguisher checks. 4) Equip one first aid kit in 2nd floor of	service. 4) Factory management has equipped one first aid kit on 2nd floor of Building A. 5) Factory management has equipped one more first aid kit on 1st floor of Building B; 3 people have the keys to it.				was in place. First aid kit is open for convenient use at anytime.				
A fi fi	A. 5) In Building B, facility only has 1 first aid kit in office on 2nd floor. This first aid kit was locked and only 1 person has the key.		Building A. 5) Equip first aid kit on both 1st and 2nd floor of Building B, kits must be able to be opened whenever needed. 6) All fire extinguishers must have a list of first aid equipment found in each first aid kit. 7) Factory management to designate a person to check all first aid kits									
			to ensure they are properly stocked and that there are no expired medicines.									
blicable laws. s ste to their job s	1) 8 bottles of chemicals were found stored without MSDS in maintenance shop. 2) Chemical storage room located on 1st floor of Building A has	Factory Tour	 Chemicals must be moved out of maintenance room accordingly, and placed in a designated chemical storage area. Factory management must ensure that all chemicals are stored as indicated by chemicals' MSDS. 2) The 	15-Apr-07 1) The MSDS for #68 oil is available; this chemical has been moved out of the maintenance room. The chemical was moved to chemical warehouse and PC has requested that it is stored with a secondary	MSDS 1) Completed Warn 2) Ongoing promi	rning signs were found to be posted Visual inspection Com ninently in Chemical Storage Room.	pleted					
	no sign or warnings.		warning sign posted in chemical storage must be improved.	container. 2) There is still no warning sign in chemical storage room when PC visited on March 29, 2007.								
oilets, canteens, C	Canteen does not have sanitary permit	Document review and	1) Factory must ensure to meet local authority's	30-May-07 1) Factory has applied for sanitary permit, but	Health Certificate 1) Ongoing Top n	management responded that they have Document reviewed Ong	Ding Factory will not be able to receive sanitary Document O	ngoing Factory committed to apply the Management Ongoing Fac	ory finally Sanitary permit, Complete			
n and safe and be in a	and 5 canteen workers' health certificates have expired.	management interview	requirements in order to obtain permit. 2) Health certificate for all cooks in kitchen must be renewed. 3) Factory management must ensure to have a system in place that reminds canteen workers when their health certificates and canteen permit are about to expire.	application has not yet been granted. 2) All cooks have obtained their health certificate	2) Completed subm	mitted the application to government and will and top management by the end of interviewed	permit from government until August 30, 2008, as some facilities in canteen do not meet local government's requirements.	sanitary permit for the canteen. interview receptor The	wed sanitary management interview management interv			
on guarantees e Union Act prevents												
ent of sole official ade Unions (ACFTU). of Trade Union Act are f freedom of f the right to strike. As Il short of ILO												
in collectively. ntroduced new oning of labor Jnion Act of October es have to be												
nblies and trade bers. Trade union agement on key d to sign collective enhanced role in llective Contracts												
esentative trade tive agreements, in iated administrative												
	No policy regarding Freedom of Association	Management Interview	1) Factory management must draft a freedom of association policy. Factory can't obstruct workers from joining and organize associations of their own choosing and to bargain collectively. 2) Workers' handbooks are distributed to all	30-Apr-07 The new version of handbook is ready for printing.	version	Printing and distribution to workers of new ion of handbook has been postponed. Top nagement responded that they will add ated organization system to new version of	Ding The new version of handbook has been sent out for printing on March 18, 2008; handbook will be distributed to workers on April 30, 2008. Top management has committed to conduct	ngoing Workers received new handbook in April 2008. Training records indicated that workers were trained on main content of handbook both during interview				
			employees before signing labor contract. Also, Reebok Human Rights Production Standards, which contains freedom of association policy is posted in prominent places around Buildings A and B.		Septe on ne	dbook and then distribute to workers in early tember 2007. Factory will conduct training new version of handbook which will include c of freedom of association policy.	training to workers accordingly.	orientation training and during refresher training.				
quired by local law or												
C v n	As per social insurance receipt for October, September and August, 197 workers are not registered for pension, medical and unemployment insurance. All workers are registered for	Document review and management interview	1) Factory social insurance must meet with local government requirements. Factory management is required to be responsible for covering 100% of work-related injury insurance; 50% of workers must cover unemployment insurance, retirement insurance and medical insurance.	31-Dec-07 1) A total of 385 workers registered for occupational injury insurance; 205 workers registered for unemployment, pension, medical and maternity insurance. 2) Currently factory meets requirement of local government, except for injury insurance. Factory's	records receip occup cover	ed on social insurance certification and sipt review, 100% of workers are covered by upational injury insurance; 50% of workers ered by unemployment insurance, retirement urance, and medical insurance. Maternity	bing Based on social insurance certification and receipt review, 100% of workers are covered by occupational injury insurance; 50% of workers and certification issued by local retirement insurance, and medical insurance.	ngoing Based on social insurance certification and receipt review, 100% of workers are covered by pension, occupational injury, medical and unemployment insurances. The local	Complete		anagement	
	Occupational Injury Insurance.		Maternity insurance is not required by local government.	usual practice is to buy injury insurance 1 month after worker is hired. Factory will improve it by buying injury insurance for new worker 1 week after the recruitment.	name mater factor worke	arrance has not been opened in [Province ne] area, and as a result, factory can not buy ernity leave insurance for workers. Instead, ory provides 90 days paid maternity leave to kers. Although factory has met local	Maternity insurance has not been opened in [Province name] area, and as a result, factory can not buy maternity leave insurance for workers. Instead, factory provides 90 days paid maternity leave to workers. Although	law released recently indicated that those workers with more than 2 years participation in social insurance scheme are entitled to maternity insurance. Factory will		However, because workers with less than 2 years of seniority do not qualify for government maternity insurance, factory will cover workers' maternity insurance through a maternity allowance that covers		
					still d there	ernment's social insurance requirements, it doesn't meet adidas SEA requirements; efore, factory has been requested to buy iness insurance to meet SEA requirements.	factory has met local government's social insurance requirements, it still doesn't meet adidas SEA requirements; therefore, factory has been requested to buy business insurance to meet SEA requirements.	issue factory internal benefit policy to cover those not eligible by maternity insurance. Currently paid maternity leave is granted to eligible employees.		the same benefit as maternity insurance provided by social insurance scheme. This policy was announced to all employees on the bulletin board and also was included in employee handbook.		
nd other incentives will	No time record for security guards. There is a risk of	Document review	 The time/hours of work records for security guards must be changed to an electronic or mechanic time recording system. 2) Factory management must ensure to record all 	changed to electronic recording system. 2) All hours	Time card records Completed							
ime or (b) the limits work week in such	miscalculation of working hours and wages.		hours worked by security guards.	worked (including OT) are properly being recorded .								
the lesser of (a) 48 (b) the limits on a law of the country of ountry will not limit	As per time records reviewed in October, 4 workers worked 14 hours per day for 4 days. Their working hours per week passed over 60 hours.	Document review	Workers in warehouse must not be permitted to work more than 11 hours per day, including overtime. 1) Factory management must create a system that tracks workers' hours of work in order to ensure that they do not surpass the local legal limits. 2) Factory managers must ensure to	30-Jun-07 Randomly inspected time card record of 2 workers in warehouse showed they still worked 12-14 hours per day for a few days in March 2007.	since record found day fo	tory employed 6 more workers in warehouse to April 2007. After reviewing the time card ords of all workers in warehouse, it was ad that 2 workers worked 12-13 hours per for a few days in June 2007. Top	workers in warehouse, it was found that 3 workers worked 12-14 hours per day for a few days in March 2008. Top management indicated that they will create 2 shifts in	workers. There are 6-7 workerworker interview andworking 12-14 hours a day,managementoccasionally making deliveries tointerviewtheir buyers' sites. Factory has	Complete	truck drivers. Previously, workers had to load truck, drive to buyers' sites and move goods out of trucks. Therefore, time spent on road counted as working	r interview, gement	
in such country plus at least 1 day off in iness circumstance is ald not have been able efforts.			train all supervisors/managers on legal requirements to ensure that they don't ask workers to work OT when they have surpassed the legal limit.		the er or by shifts	hagement promised to settle this issue by end of August, by employing more workers y rearranging working hours to 2 different is. This issue will continue to be monitored he PC's compliance staff.	warehouse to reduce working hours accordingly.	introduced a schedule rotation: if worker worked 12-14 a day, then will work 6-8 hours the next day so as to balance workload. However, this practice is still noncompliant with local labor law or SEA standards.		hours. This resulted in excessive hours for these workers. However, currently factory has employed 4 additional workers. 2 of the workers were allocated to work at buyers' site so that they move goods out of trucks when they arrive at		
	In May, March and August, records	Document review	1) Security guards must be allowed at least 24 consecutive	,	Shift arrangement Completed					goods out of trucks when they arrive at buyers' sites. This arrangement reduced 1-2 hours spent on way from factory to their buyers' sites.		
d ti d a fo	showed workers (different ones on different occasions) worked for more than 7 days in a row without a rest day. In the case of security guards, according to shift arrangement records for November and December all of		hours of rest within every 7 day period.	, , , , , , , , , , , , , , , , , , , ,	and interview of security guards							
ti	them had 1 day off after working for 15 consecutive days.											
ri V O	As per cross checking between time records and payroll, in October, all workers' OT hours used in calculation of payroll were 1 hour less than actual OT hours worked.		1) Factory management must ensure that workers punch in/out during their lunch break in order to avoid the OT calculated including workers' lunch period. 2) Factory management must properly calculate workers' wages based on total number of hours worked at all times.	30-Jun-07 As per time records of January 2007, 1 hour of lunch break is being recorded for Trimming department and their QC and other departments must improve their time recording system. SEA Team will continue to verify this issue.	break of Bui record upgra	documentation review, workers' 1-hour lunch ak is being recorded for workers on 2nd floor uilding B. By late August, time card ording system for all workers will be raded to a new system that will require them	break has been recorded for trimming and quality control departments. As time card recording system can't be upgraded for all departments at same time, factory interviewed	ngoing Starting September 2008, all punches in/out have been recorded accurately for the lunch breaks of all workers. All working hours were recorded accurately.				
						unch in/out during lunch hour.	management plans to upgrade time recording system in other departments on July 30, 2008. For those who work in office building, their time recording system will be upgraded August 30, 2008. Therefore, time card record of 1-hour lunch break will be completed on or					
	13 out of 17 security quarde have		1) Factory management must exercise the control of the	30-Apr-07		he security quarks have received the	before August 30, 2008.					
1 n	13 out of 17 security guards have mandated certificates.	Document review and management interview	1) Factory management must ensure that all Security guards have the mandated certificate before being hired as a security guard. 2) Factory management must keep track of security guards' certificates in order to ensure that they are always up to date.	30-Apr-07 1) 3 out of 12 security guards have the mandated certificates that expired in December 2006. Renewals of their certificates are currently being processed. Certificates for other 9 security guards available already during PC's last audit. 2) Currently, personnel department has made regulation to check expiration		he security guards have received the ndated certificates now. Document reviewed Com guards interviewed						
				dates of all relevant certificates on monthly basis and								I '