

FLA Audit Profile	
Country	Thailand
Factory name	12007461C
IEM	Kenan Institute Asia
Date(s) in facility	November 24-26, 2004
PC(s)	Reebok
Number of workers	3075
Product(s)	Footwear
Production processes	Cutting, Sewing, Assembling, Sole Rubber Mixing-Pressing

Findings								Remediation				
FLA Code/Compliance Issue	Country Law/Legal Reference	FLA Benchmark	Monitor's Findings	Documentation (If Finding Corroborated/Verified Via Multiple Sources, List All)	Was Finding Corroborated? Yes or No	If Not Corroborated, Explain Why	Best Practice	PC Remediation Plan	Target Completion Date	Factory Response (Optional)	Company Follow Up (Cite Date of Follow Up)	Documentation
<b>1. Code Awareness</b>												
Worker/Management Awareness of Code	Labor Protection Act BE.2541 Chapter 9 Section 108:	FLA Principles of Monitoring, Obligations of Companies: Ensure that all Company factories as well as contractors and suppliers inform their employees about the workplace standards orally and through the posting of standards in a prominent place (in the local languages spoken by employees and managers) and undertake other efforts to educate employees about the standards on a regular basis.	There is no company rule and regulation posted in workplace. Noted: The factory sent the revised company rule to the local labor department for reviewing and just received back the new company rule on day of auditing; thus, no factory rule posted on the work floor.	Visual inspection and workers and management interviewed.	Yes			Once regulations have been reviewed and returned to factory, factory must post company policies.	31-Jan-05		(Mar 7, 05) Based on visual inspection, factory posts company rules and regulations on public noticed board.	Visual inspection.
<b>2. Forced Labor</b>												
There will not be any use of forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise												
Freedom of Movement		Employers are prohibited from practices that restrict a worker's ability to terminate his or her employment or freedom of movement, including physical or mental coercion, deposits, unreasonable financial penalties or recruitment fees, and access to and renewal of identity papers and/or work permits or other legal identification documents.	Some working group in the assembly line work during lunch time from 11:30-12:00, 30 minutes. Since those workers are paid by group target, this may be indirect force as workers try to complete the group target.	Visual inspection.				Factory must have a system in place to guarantee that workers take allotted lunch break and do not use this time to complete their group target.	15-Jan-05	(Jan 15, 05) Factory management agreed to shutdown power during lunch time (11-12:00am) for 45 minutes so workers can take reasonable break. The practice is still ongoing.	(Mar 16, 05) Factory still shuts down power during lunch time. Reebok monitor will follow up factory's implementation in next visit, to determine together with management steps to be taken to ensure consistent compliance. (April 4, 05) Factory found to no longer implement power shutdown as workers continued to work throughout lunch (even without lighting) and have complained about new procedure. Reebok to discuss issue further and determine more appropriate solution. (June 7, 05) Reebok still working with senior management to determine a solution. (July 27, 05) Factory issued energy saving policy which results in ceasing power shutdown on production floor during lunch break. Policy, effective on July 25, 05, was endorsed by top management.	Visual inspection, Worker interview.
Employment Records		Employers will maintain sufficient hiring and employment records to demonstrate and verify compliance with this code provision.	As per the employment contract stated that "This contract is made in two originals which have the same matter. The parties acknowledge and understand thoroughly the terms and conditions herein". However, the employer did not provide neither the original or copy of employment contracts to the employees.	Workers and HR officer interviewed. Document reviewed.				All employees must be provided a copy of their labor contract upon hire. Factory must submit a plan for ensuring all current workers have a copy of their contract and all new workers are provided with a copy upon hire.	15-Jan-05	(15 Jan 05) Factory agrees and has started to provide a copy of employment contract to old workers. Deadline Feb 28, 2005. For new workers, a copy of labor contract is also provided after employment.	(Mar 16, 05) As determined from list of old workers' signatures, total of 1446 workers signed their names upon receiving copy of employment contract. Factory is in process of revising existing hiring procedures that determine responsibility of HR staff to provide copy of employment contract to new workers to ensure accountability and consistency of implementation. (April 4, 05) Reebok monitor verified that factory has appointed 3 HR staff accountable for implementation.	List of workers' signatures verifying receipt of copy of employment contract. Revised hiring procedures submitted
<b>3. Child Labor</b>												
No person will be employed at an age younger than 15 (or 14 where the law of the country of manufacture allows) or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15.												
Legal Compliance for Juvenile Workers	Labor Protection Act BE.2541 Chapter 4 Section 48 :	Employers will comply with applicable laws that apply to young workers, i.e., those between the minimum working age and the age of 18, including regulations relating to hiring, working conditions, types of work, hours of work, proof of age documentation, and overtime	Some workers who are under 18 years old worked more than 8 hours per day. Some work until almost 6pm, which is against the law which states that the young workers can't work overtime.	Attendance record reviewed, young worker interviewed.	Yes			Factory must ensure all laws limiting working hours for young workers are observed. Factory must submit working hours records for January for all workers under the age of 18 to Reebok along with procedures to ensure young workers stay within legal limits.	15-Jan-05	(Jan 31, 05) Factory adheres to the existing employment policy, not to hire workers younger than 18 years old. The policy is posted on notice board.	(Mar 7, 05) Factory has recently set up system whereby total of 38 young workers are to manually sign their names on punch cards in front of factory operators, so HR department can cross check working hours of these workers. Factory also met with production supervisors to stress factory's policy in meeting with applicable law. (April 4, 05) Reebok monitor found that some young workers (3 out of 30) were signing out according to new procedure but then returning to their workstation in order to assist their group in achieving team targets. Factory management will issue warning letter to these workers who are not following newly established procedures, as well as to supervisors for their failure to implement. (June 7, 05) Follow up visit by Reebok monitor verified system is now functioning. All juvenile workers required to wear a wristband signaling to management their special employment status. Supervisors are now able to ensure adherence to working hour restrictions.	Time card for young workers. Updated list of young workers
Lack of Protection of Underage Workers	Labor Protection Act BE.2541 Chapter 4 Section 49 :	Employers will ensure that, all workers engaged in operating or working close to hazardous equipment, working at dangerous heights or lifting heavy loads, or exposed to hazardous substances, are above the legal age for such work.	Some youth worker is assigned to work with hazard chemical task in the assembly line where the chemical glue (Solvent base) is used.	Employee's contract reviewed and young worker interviewed.	Yes			Factory must ensure workers under the age of 18 are not placed in positions that require working with hazardous chemicals. Factory must relocate young workers immediately and submit a plan to Reebok for ensuring that upon hire young workers are placed in appropriate positions.	15-Jan-05	(Feb 17, 05) Factory relocated some young workers from positions that require working with chemicals, and met with production supervisors to communicate and get their understanding of the policy. Reebok monitor was also in the meeting. Factory reports to adhere to the existing policy not to hire new workers younger than 18 years old.	(Mar 9, 05) Factory requested to submit list of young workers with current positions. Reebok monitor will verify factory's implementation in next visit. (Mar 16, 05) Factory is in process of placing and controlling young workers not to work with chemicals. Reebok monitor will verify factory's implementation again next time, and cross check against factory's list of young workers with current positions. (April 4, 05) Reebok monitor found young worker working with cleaning agent. Factory management will issue warning letter to supervisor of that workstation. (June 7, 05) Follow up visit by Reebok monitor verified system is now functioning.	Updated list of young workers. Random interviews with young workers

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Juvenile Worker Identification System		Employers will have a system for identifying work stations and operations that are inappropriate for young workers according to applicable laws.	The factory has a policy to hire the workers above the age of 18. However, it's found that there are 37 workers aged under 18 working in the factory.	Document review, management interview and visual inspection				Factory should investigate how workers under the age of 18 are hired in violation of internal policies and submit an explanation to Reebok. Additionally, factory should submit improved procedures specifying systems in place to prevent the hiring of underage workers and the name of the person(s) responsible for their implementation.	15-Feb-05		(Mar 16, 05) As determined from actual application forms, no new workers under age of 18 hired since February onwards. Factory is in process of revising hiring procedures and determining names of HR person(s) responsible for recruitment process that ensure young workers will not be hired in violation of internal policies. Factory shall submit revised procedures by Mar 21, 05. (April 4, 05) Reebok monitor has verified implementation of revised procedures.	Revised hiring procedures with names of HR persons accountable for the duty submitted
<b>4. Harassment or Abuse</b>												
Every employee will be treated with respect and dignity. No employee will be subject to any physical, sexual, psychological or verbal harassment of abuse.												
Verbal Abuse		Employers will prohibit screaming, threatening, or demeaning verbal language.	Some supervisor have yelled to workers during rush production if supervisor found that the workers could not reach the target.	Workers interviewed.				Factory must train supervisors on polices and procedures regarding harassment. This training should, in particular, address prohibited behaviors.			(Feb 15, 05) Factory met with about 120 production trainers and division supervisors on February 5 and 12, 05 to communicate factory's policy on harassment, and instruct them how to cope with tension arose from production problem. A copy of attendance records with attendees' signatures submitted to Reebok monitor. (Mar 9, 05) Reebok monitor plans to conduct RHRPS training for production supervisors in June-July, to ensure they understand essence of Reebok Standards. (June 7, 05) Training by Reebok monitor scheduled for July 2, 2005. (July 2, 05) Reebok monitor conducted non-harassment training today for 25 X supervisors. Training materials and records maintained in factory's profile.	Meeting minutes, content of subjects delivered on Feb 5 and 12.
<b>5. Nondiscrimination</b>												
No person will be subject to any discrimination in employment, including hiring, salary, benefits, advancement, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, or social or ethnic origin.												
Hiring Discrimination Practices		Employment decisions will be made solely on the basis of education, training, demonstrated skills or abilities. All employment decisions will be subject to this provision. They include: hiring, job assignment, wages, bonuses, allowances, and other forms of compensation, promotion, discipline, assignment of work, termination of employment, provision of retirement.	The application form asking about race, nationality and military service of the applicant.	Application form reviewed.				Factory must eliminate questions pertaining to protected classes from application forms, unless it can be proven that these questions are asked in order to fulfill legal obligations. All applicants must be selected solely based on the ability to perform the job. A copy of the revised application form should be submitted to Reebok.	15-Jan-05	Jan 15, 05) Factory submits revised application form, that was used from Sept 2004 onwards. The revised form doesn't have information in regards with race, nationality and military service.	(Mar 16, 05) As determined from actual application forms filled by new workers in Jan-Mar 05, factory uses the revised form that asks no such information.	Review of application form
Pregnancy Discrimination		Information arising from pregnancy testing undertaken voluntarily will not be used as a factor in involuntarily reassigning, firing or making any other employment decision that disadvantages a pregnant woman.	The new applicant is required to do urine test to find out the amphetamine, since factory is certified white factory by government, so that drug people will be not accepted to work in facility. The monitor concerned that factory may use this opportunity to do the pregnancy test.	Employee's file reviewed, worker and management interviewed.				Factory must demonstrate to Reebok how they ensure protections for female workers against pregnancy testing.		(Jan 15, 05) Based on discussion with factory management and recruitment staff, factory reports no pregnancy testing for female workers, which is in line with Drug Test Memo issued by Reebok Thailand in 2003. However, urine testing to find amphetamines is still undertaken for new male applicants only to enhance the government's white factory policy. According to factory, testing is conducted at a public hospital, not at in-house clinic.	(Mar 9, 05) Reebok monitor will verify factory's implementation through random new workers' discussion in the next visit. (Mar 16, 05) As determined from discussion with new workers, both female and male workers report they are not required to undergo health examination or urine test during hiring process. Factory management reports that drug test is not required for male workers either. This is reflected in the recently-developed hiring procedures submitted to Reebok monitor.	Review of hiring procedures, worker interview.
<b>6. Health and Safety</b>												
Employers will provide a safe and healthy working environment to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of employer facilities.												
Fire Safety Health and Safety Legal Compliance	The Notification of the Ministry of Interior RE: Working Safety relating to Protection of Fire for Employees, Chapter 3, Clause 19 (3)	Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits.	The record of fire fighting could not confirm that there were 40% of total workers who passed training.	Professional Safety Officer interviewed and document reviewed.	Yes			Factory must maintain records to demonstrate compliance with local laws regarding fire safety training. Any legally mandated training must be held for the specified workforce and properly documented. Training records must be submitted to Reebok.	31-Jan-05		(Mar 16, 05) Factory is in a process of providing training sessions for about 900-1000 workers on basic fire fighting and use of fire extinguishers. Deadline: Mar 31, 2005. (April 4, 05) Factory conducted training for 919 workers on March 21-25th.	Training plan and records.
Worker Participation	The Notification of the Ministry of Labor and Social Welfare RE: Occupational Safety of Employees, Chapter 2, Clause 10	Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits.	Not all supervisors are trained on safety officer at supervisory level in the facility.	Professional Safety Officer interviewed and document reviewed.	Yes			Factory must comply with local laws regarding fire safety training. Any legally mandated training must be held for the specified workforce and properly documented. Training records must be submitted to Reebok.	31-Jan-05	(Feb 22, 05) Factory submits a copy of training for 68 production supervisors on the 12 hour safety officer course in 2004.	(Mar 16, 05) Based on discussion with factory management, factory will provide another session of training for supervisors by May 7, 05. This is because March-April are peak production period. (June 7, 05) Training not held in May as budget was not approved by factory senior management. Reebok negotiating with factory and anticipates training will be held in July 2005. (June 29, 05) Factory submits a final plan that schedules a safety training for supervisors on 5-6 and 26-27 August respectively. (Oct 5, 05) Trainings were held according to the plan. There were 34 and 44 production supervisors participated in the 12 hour safety training course.	Training plan. List of participants and signatures, samples of training certificates.

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Fire Safety Health and Safety Legal Compliance	The Notification of Ministry of Industrial No. 2 (B.E. 2513) Clause 8:	All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, unblocked aisles/exits, employee education, evacuation procedures, etc.) shall be complied with and workers shall be trained in proper safety, first aid, and evacuation procedures	The 2 fire exits/escapes at second floor down to first floor have no emergency lighting provided that shines towards the exits.	Visual inspection	Yes				Factory must install appropriate emergency lighting and submit documentation to Reebok.	15-Jan-05	(Mar 9, 05) Factory has submitted a Human Rights and Safety Standards blueprint that contain information, i.e. locations of fire exits, fire extinguishers, toilets, washbasin, medical kits, evacuation diagrams, etc.	(Mar 16, 05) Based on visual inspection, factory relocated the emergency light to stairwell, that shines towards fire exits at second floor down to the first floor.	Visual inspection
PPE	The Notification of the Interior RE: Safety in working with Machinery Chapter 1, Clause 2	Workers shall wear appropriate protective equipment (such as gloves, eye protection, hearing protection, respiratory protection, etc.) to prevent unsafe exposure (such as inhalation or contact with solvent vapors, noise, dust, etc.) to hazardous elements including medical waste.	The workers who work with grinding machine (Buo Phylon - righthand side) did not wear transparent goggles.	Visual inspection	Yes				Factory must ensure worker is provided with the necessary goggles immediately. Factory must submit a plan to Reebok for ensuring all workers are provided with appropriate PPE and trained on its use and that supervisors are held accountable if workers do not use the equipment.	15-Jan-05	(17 Feb 05) Factory submits a list of PPE in workstations where required, including at grinding machines and a copy of meeting minutes with supervisors on Feb 5 and 12, 05 to communicate the PPE policy and procedures.	(Mar 16, 05) There are workers who still do not wear goggles at grinding machines. As factory starts to set up a system whereby supervisors are accountable to enforce the use of PPE, Reebok monitor will verify implementation in the next visit. (April 4, 05) Reebok monitor verified that every supervisor now maintains a file to track when new PPE must be provided to a worker. The ISO team monitors whether workers are wearing the PPE on a daily basis. If a worker is found to not be wearing the proper PPE, both the worker and their supervisor will receive a warning letter from factory management.	Meeting minutes, list of PPE required for use in workstation, and visual inspection
PPE	The Notification of the Ministry of Interior RE: Working Safety relating to Harmful Chemicals , Chapter 2 , Clause 21	Workers shall wear appropriate protective equipment (such as gloves, eye protection, hearing protection, respiratory protection, etc.) to prevent unsafe exposure (such as inhalation or contact with solvent vapors, noise, dust, etc.) to hazardous elements including medical waste.	Production line No. XXX where used chemical called 233 EA, the workers did not wear gloves because line leader said the workers moved to this line to work in temporary basis.	Visual inspection	Yes				Factory must ensure all workers (even those moved to a line temporarily) are provided with the necessary gloves immediately. Factory must submit a plan to Reebok for ensuring all workers are provided with appropriate PPE and trained on its use and that supervisors are held accountable if workers do not use the equipment.	15-Jan-05	(17 Feb 05) Factory submits a list of PPE in workstations where required, including those in contact with chemicals, and a copy of meeting minutes with supervisors on Feb 5 and 12, 05 to communicate the PPE policy and procedures.	(Mar 16, 05) As factory starts to set up a system whereby supervisors are accountable to enforce the use of PPE and ensure consistency, Reebok monitor will verify implementation in the next visit. (April 4, 05) Reebok monitor verified that every supervisor now maintains a file to track when new PPE must be provided to a worker. The ISO team monitors whether workers are wearing the PPE on a daily basis. If a worker is found to not be wearing the proper PPE, both the worker and their supervisor will receive a warning letter from factory management.	Meeting minutes, list of PPE required for use in workstation, and visual inspection
PPE	The Notification of the Ministry of Interior RE: Working Safety relating to Harmful Chemicals , Chapter 2 , Clause 21	Workers shall wear appropriate protective equipment (such as gloves, eye protection, hearing protection, respiratory protection, etc.) to prevent unsafe exposure (such as inhalation or contact with solvent vapors, noise, dust, etc.) to hazardous elements including medical waste.	Production line No.XXX (hazardous chemicals are used - lefthand side), the workers did not wear gloves.	Visual inspection	Yes				Factory must ensure workers are provided with the necessary gloves immediately. Factory must submit a plan to Reebok for ensuring all workers are provided with appropriate PPE and trained on its use and that supervisors are held accountable if workers do not use the equipment.	15-Jan-05	(17 Feb 05) Factory submits a list of PPE in workstations where required, and a copy of meeting minutes with supervisors on Feb 5 and 12, 05 to communicate the PPE policy and procedures.	(Mar 16, 05) As factory starts to set up a system whereby supervisors are accountable to enforce the use of PPE and ensure consistency, Reebok monitor will verify implementation in the next visit. (April 4, 05) Reebok monitor verified that every supervisor now maintains a file to track when new PPE must be provided to a worker. The ISO team monitors whether workers are wearing the PPE on a daily basis. If a worker is found to not be wearing the proper PPE, both the worker and their supervisor will receive a warning letter from factory management.	Meeting minutes, list of PPE required for use in workstation, and visual inspection
PPE	The Notification of the Ministry of Interior RE: Working Safety relating to Harmful Chemicals , Chapter 2 , Clause 21 and Labor Protection Act BE:2541 Chapter 3 Section 39:	Workers shall wear appropriate protective equipment (such as gloves, eye protection, hearing protection, respiratory protection, etc.) to prevent unsafe exposure (such as inhalation or contact with solvent vapors, noise, dust, etc.) to hazardous elements including medical waste.	One pregnant worker who sit near production line No.XXX (hazardous chemical used) had no any PPE, she said the factory did not provide her the PPE.	Visual inspection	Yes				Factory must ensure workers are provided with the necessary PPE immediately. Factory must submit a plan to Reebok for ensuring all workers are provided with appropriate PPE and trained on its use and that supervisors are held accountable if workers do not use the equipment.	15-Jan-05	(17 Feb 05) Factory submits a list of PPE in workstations where required including those in contact with chemicals, and a copy of meeting minutes with supervisors on Feb 5 and 12, 05 to communicate the PPE policy and procedures.	(Mar 16, 05) As factory starts to set up a system whereby supervisors are accountable to enforce the use of PPE and ensure consistency, Reebok monitor will verify implementation in the next visit. (April 4, 05) Reebok monitor verified that every supervisor now maintains a file to track when new PPE must be provided to a worker. The ISO team monitors whether workers are wearing the PPE on a daily basis. If a worker is found to not be wearing the proper PPE, both the worker and their supervisor will receive a warning letter from factory management.	Meeting minutes, list of PPE required for use in workstation, and visual inspection
PPE	The Notification of the Ministry of Interior RE: Safety in Working with Machinery Chapter 1, Clause 2	Workers shall wear appropriate protective equipment (such as gloves, eye protection, hearing protection, respiratory protection, etc.) to prevent unsafe exposure (such as inhalation or contact with solvent vapors, noise, dust, etc.) to hazardous elements including medical waste.	The workers at Phylon pressing department did not use ear plugs.	Visual inspection	Yes				Factory must ensure workers are provided with the necessary ear plugs immediately. Factory must submit a plan to Reebok for ensuring all workers are provided with appropriate PPE and trained on its use and that supervisors are held accountable if workers do not use the equipment.	15-Jan-05	(17 Feb 05) Factory submits a list of PPE in workstations where required including those at phylon pressing department, and a copy of meeting minutes with supervisors on Feb 5 and 12, 05 to communicate the PPE policy and procedures.	(Mar 16, 05) As factory starts to set up a system whereby supervisors are accountable to enforce the use of PPE, Reebok monitor will verify implementation in the next visit. (April 4, 05) Reebok monitor verified that every supervisor now maintains a file to track when new PPE must be provided to a worker. The ISO team monitors whether workers are wearing the PPE on a daily basis. If a worker is found to not be wearing the proper PPE, both the worker and their supervisor will receive a warning letter from factory management.	Meeting minutes, list of PPE required for use in workstation, and visual inspection
PPE	The Notification of the Ministry of Interior RE: Working Safety Relating to Harmful Chemicals , Chapter 2 , Clause 21	Workers shall wear appropriate protective equipment (such as gloves, eye protection, hearing protection, respiratory protection, etc.) to prevent unsafe exposure (such as inhalation or contact with solvent vapors, noise, dust, etc.) to hazardous elements including medical waste.	2 workers (in a shift) in color mixing room at 2nd floor did not use carbon mask, they used 2 cotton masks at the same time.	Visual inspection	Yes				Factory must ensure workers are provided with the necessary masks immediately. Factory must submit a plan to Reebok for ensuring all workers are provided with appropriate PPE and trained on its use and that supervisors are held accountable if workers do not use the equipment.	15-Jan-05	(17 Feb 05) Factory submits a list of PPE in workstations where required including those at phylon pressing department, and a copy of meeting minutes with supervisors on Feb 5 and 12, 05 to communicate the PPE policy and procedures.	(Mar 16, 05) As factory starts to set up a system whereby supervisors are accountable to enforce the use of PPE and ensure consistency, Reebok monitor will verify implementation in the next visit. (April 4, 05) Reebok monitor verified that every supervisor now maintains a file to track when new PPE must be provided to a worker. The ISO team monitors whether workers are wearing the PPE on a daily basis. If a worker is found to not be wearing the proper PPE, both the worker and their supervisor will receive a warning letter from factory management.	Meeting minutes, list of PPE required for use in workstation, and visual inspection

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PPE	The Notification of the Ministry of Interior RE: Working Safety Relating to Harmful Chemicals , Chapter 2 , Clause 21	Workers shall wear appropriate protective equipment (such as gloves, eye protection, hearing protection, respiratory protection, etc.) to prevent unsafe exposure (such as inhalation or contact with solvent vapors, noise, dust, etc.) to hazardous elements including medical waste.	The workers in production line No. XX (lethand side) did not use cotton masks because they felt uncomfortable.	Visual inspection	Yes			Factory must submit a plan to Reebok for ensuring all workers are provided with appropriate PPE and trained on its use and that supervisors are held accountable if workers do not use the equipment.	15-Jan-05	(17 Feb 05) Factory submits a list of PPE in workstations where required, and a copy of meeting minutes with supervisors on Feb 5 and 12, 05 to communicate the PPE policy and procedures.	(Mar 16, 05) As factory starts to set up a system whereby supervisors are accountable to enforce the use of PPE and ensure consistency, Reebok monitor will verify implementation in the next visit. (April 4, 05) Reebok monitor verified that every supervisor now maintains a file to track when new PPE must be provided to a worker. The ISO team monitors whether workers are wearing the PPE on a daily basis. If a worker is found to not be wearing the proper PPE, both the worker and their supervisor will receive a warning letter from factory management.	Meeting minutes, list of PPE required for use in workstation, and visual inspection
PPE	The Notification of the Ministry of Interior RE: Working Safety in the Respect to Environmental Condition Chapter 1, Clause 3	Workers shall wear appropriate protective equipment (such as gloves, eye protection, hearing protection, respiratory protection, etc.) to prevent unsafe exposure (such as inhalation or contact with solvent vapors, noise, dust, etc.) to hazardous elements including medical waste.	The factory did not provide proper PPE for the workers at a department who works with calendar molding (mold temperature is 160-165° C), such as protective apparels, shoes and gloves. (Factory provided cotton gloves, apron, cotton hair protection.) Noted: The temperature as 160-165°C was referred from calendar mold temperature, it is not workplace temperature where workers have to work close with the machinery; thus, they shall be provided proper PPE which is able to protect worker from heating.	Visual inspection	Yes			Factory must ensure workers are provided with the necessary PPE immediately. Factory must submit a plan to Reebok for ensuring all workers are provided with appropriate PPE and trained on its use and that supervisors are held accountable if workers do not use the equipment.	15-Jan-05		(Mar 9, 05) Factory is in process of consulting 2 local specialized agencies to determine whether or not leather gloves or leather aprons necessary for these workstations. This is because workplace environment was measured only at 34°C, according to 2004 annual report submitted to Reebok. (Mar 31, 05) Factory submitted report of internal survey conducted with 44 pressing workers. The survey results indicated that workers are satisfied with heat protection provided. Factory also reported that supplier contacted to supply leather apron and gloves for trial of 2 weeks in early March. Workers reported uncomfortable using leather gloves. The nearby hospital and Safety Center	Letters submitted to the Hospital and safety Center in the Area. Internal survey report on the use of gloves at pressing stations
PPE	Nil	Workers shall wear appropriate protective equipment (such as gloves, eye protection, hearing protection, respiratory protection, etc.) to prevent unsafe exposure (such as inhalation or contact with solvent vapors, noise, dust, etc.) to hazardous elements including medical waste.	The factory should provide PPE sign or symbol which install in each department where PPE require.	Visual inspection	Yes			Posting signs or symbols may be an effective way to communicate in each department when and how PPE should be used. Additionally, factory must submit a plan to Reebok for ensuring all workers are provided with appropriate PPE and trained on its use and that supervisors are held accountable if workers do not use the equipment.	15-Jan-05		(Mar 16, 05) Factory has submitted a list of PPE where required in each work station, factory is requested to post signs or symbols as recommended in the remediation plan. (April 4, 05) Reebok monitor has verified appropriate signs and symbols are posted in areas where PPE is required.	List of required PPE in each work stations.
Safety Equipment	The Notification of the Ministry of Interior RE: Safety in Working with Machinery Chapter 1, Clause 6	Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits.	Production line No.XXX, when the machine was repaired, the maintenance engineer did not hang on a tag stating "Danger, Do Not Operate" or "In Repairing Process" in place.	Visual inspection	Yes			Factory must install guards and warning signs around all machines during maintenance. Machine safety procedures during maintenance should be submitted to Reebok.	15-Jan-05		(Feb 17, 05) Factory submits a copy of meeting minutes with maintenance engineers, to communicate the log out/tag out procedures. (Mar 16, 05) To ensure a system in place, factory is required to provide a lockbook at three production areas where mechanic staff are stationed. The lockbook is to record when lock out/tag out signs are used in the production lines. (April 4, 05) Reebok monitor verified lockbooks are maintained as specified by new system.	Meeting minutes and procedures for use of log out tags. Visual inspection.
Evacuation Procedure	The Notification of Ministry of Interior RE: Working Safety Relating to Protection and Prevention of Fire for Employees Chapter 1, Clause 4	All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, unblocked aisles/exits, employee education, evacuation procedures, etc.) shall be complied with and workers shall be trained in proper safety, first aid, and evacuation procedures.	The factory posted plan for evacuation at gate No. XX. It should be at every fire exit/escape.	Visual inspection	Yes			Factory should revise posted plan and submit a copy of the diagram to Reebok.	15-Jan-05		(Mar 9, 05) Reebok monitor will verify the blueprint and determine whether or not revised evacuation diagrams are posted according to the blueprint. (Mar 16, 05) As determined from factory walkthrough, it is uncovered that location of some items are not in line with those in the blueprint. So, factory is requested to revise the blueprint to reflect the actual locations of such items. The revised blueprint also has to include evacuation diagram. Deadline: Mar 25, 05. (April 4, 05) Factory has revised blueprint and evacuation diagrams.	(Mar 9, 05) Factory has submitted a Human Rights and Safety Standards blueprint that contains information, i.e. locations of fire exits, fire extinguishers, toilets, washbasin, medical kits, evacuation diagrams, etc.
Safety Equipment	The Notification of the Ministry of Interior RE: Safety in Working with Machinery Chapter 1, Clause 2	All safety and medical equipment (such as fire fighting equipment, first aid kits, etc.) shall be in place, maintained as prescribed and accessible to the employees.	Most of machines in the factory have no work instruction (WI) and safe work instruction (SWI) such as pressing machines, marking process machine and the machine in slipper department (new department). Besides, on and off switch is in English and Korean language specifically fusing and SRC machines.	Visual inspection	Yes			Instructions for proper machine operation should be posted in the local language of the workers. Factory must create appropriate instructions detailing appropriate safety procedures and ensure workers are trained in proper usage.	31-Jan-05		(Feb 17, 05) Factory reports WI and SWI are posted in all machines. But when verifying, it is uncovered that the font letters are too small to read. Factory is requested to enlarge the letters so that machine operators are able to read. (Mar 16, 05) Deadline is extended to March 25 due to a resignation of former Manager in charge of maintenance. (April 4, 05) Factory has prepared new WI and SWI with enlarged font and plan to post within the next two weeks. (June 7, 05) Reebok monitor found revised posting for 75% of machines. The remaining 25% will be done in July because factory is waiting on materials. (July 27, 05) Factory posts all the remaining WI on machines.	Visual inspection
Safety Equipment	The Notification of the Ministry of Interior RE: Safety in Working with Machinery Chapter 1, Clause 5 (5)	All safety and medical equipment (such as fire fighting equipment, first aid kits, etc.) shall be in place, maintained as prescribed and accessible to the employees.	Some machines not equipped the machine guard such as grinding machine at phylon grinding department (buo phylon - righthand side of production line) to protect against fly fragments. And pressing machines at production line No. X-X has no machine guard to protect workers hands/fingers.	Visual inspection	Yes			Factory must install appropriate guards on all machines immediately. Photos of installed guards and machine safety procedures should be submitted to Reebok.	15-Jan-05	(Feb 17, 05) Factory reports that guards at grinding machines are installed but short, in order not to block workers' hand movement. Factory agreed to provide and enforce use of transparent goggles at this station.	(Mar 16, 05) Machine guards are short but provide adequate protection. As factory starts to set up a system whereby supervisors are accountable to enforce use of PPE and ensure consistency, Reebok monitor will verify implementation in the next visit. (April 4, 05) Reebok monitor verified that every supervisor now maintains a file to track when new PPE must be provided to a worker. The ISO team monitors whether workers are wearing the PPE on a daily basis. If a worker is found to not be wearing the proper PPE, both the worker and their supervisor will receive a warning letter from factory management.	Management discussion, list of PPE, visual inspection

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			Monitor's Findings	Documentation (If Finding Corroborated/Verified Via Multiple Sources, List All)	Was Finding Corroborated? Yes or No	If Not Corroborated, Explain Why	Best Practice	PC Remediation Plan	Target Completion Date	Factory Response (Optional)	Company Follow Up (Cite Date of Follow Up)	Documentation
Safety Equipment	The Notification of the Ministry of Interior RE: Welfare on Health and Hygiene for Employees, Clause 2 (1) (Notified on 16 April B.E. 2515)	All safety and medical equipment (such as fire fighting equipment, first aid kits, etc.) shall be in place, maintained as prescribed and accessible to the employees.	The first aid boxes and signs are available (2 boxes at the 1st floor and 1 box at the 2nd floor). The factory installed first aid boxes in the workstation, but the medicine and first aid supply is not adequately stocked according to the list (15 items). The law stated that it should have 23 items.	Visual inspection and medical list reviewed.	Yes			First aid kits must be fully stocked at all times according to local law and Reebok standard requirements. Factory must obtain the missing contents and add items to the content list. List must be submitted to Reebok along with name of person(s) responsible for ensuring first aid kits are fully and adequately stocked.	31-Jan-05		(Mar 9, 05) Factory has submitted a Human Rights and Safety Standards blueprint that contain information, i.e. locations of fire exits, fire extinguishers, toilets, washbasin, medical kits, evacuation diagrams, etc. (Mar 16, 05) Based on visual inspection against factory's blueprint, are 4 medical kits on 1st production floor, and 1 on 2nd floor. (April 4, 05) First aid boxes are in appropriate locations and properly stocked with 15 items required by Reebok Standards. Additional items specified by local law recommended but not required. As factory has an accessible on-site clinic, determined that additional recommended items are not necessary.	Visual inspection.
Safety Equipment	The Notification of the Ministry of Interior RE: Welfare on Health and Hygiene for Employees, Clause 2 (2) (Notified on 16 April B.E. 2515)	All safety and medical equipment (such as fire fighting equipment, first aid kits, etc.) shall be in place, maintained as prescribed and accessible to the employees.	The clinic has 1 permanent professional nurse, 1 factory staff who acts as nurse assistant and 1 doctor visit 1 hour (at 12.00-13.00 hrs) each Thursday and Saturday on the first and last week of the month. The national law stated the doctor has to visit the factory clinic at least 2 hours each.	Visual inspection and attendance doctor and nurse reviewed.	Yes			Factory must ensure compliance with local law and hire doctor as specified. Name of doctor hired and hours to be available must be provided to Reebok.	31-Jan-05		(Mar 7, 05) Factory revises weekly doctor visit, to be 2 hours for each visit, between 12:00 - 14:00. Names of doctors and their specialties for weekly visit throughout year posted on notice board in medical treatment room and factory's public board. (Mar 16, 05) As determined from doctor's attendance records with their signatures, doctors spent 2 hours for each weekly visit to factory.	Doctor's attendance records.
Chemical Management	The Notification of the Ministry of Interior RE: Working Safety Relating to Harmful Chemicals, Chapter 1, Clause 4	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.	No MSDS for production line No. (lefthand side), color mixing room (chemical measurement room at 2nd floor), production line No. X (Reebok classic) and production line No. X (lefthand side).	Visual inspection	Yes			MSDS must be made available to all workers handling chemicals and workers must be trained to read and understand its contents. Factory must obtain the MSDS for all chemicals in the language of the workers immediately. A plan for training workers on MSDS and chemical safety must be submitted to Reebok.	31-Jan-05		(Mar 16, 05) Only a few workstations have no MSDS relevant to chemical in use. Factory required to develop written procedure and appoint accountable person for providing MSDS at chemical stations and making it accessible at all time. In regards to training, factory submitted training records held by ****, for about 140 workers and supervisors from various workstations on safe use of chemicals during Nov 12 and Dec 14-15, 2004. Based on random of worker discussion, workers can recall training and are aware of emergency procedures for chemical exposures. (April 4, 05) Factory submitted procedures, but need to be revised to include specific individuals accountable for implementation. Factory will submit revised procedures by Friday, April 8. (July 19, 05) Factory submitted revised MSDS procedures with proper accountability of production staff and ISO in process, and submitted meeting minutes dated June 28 for communicating the procedures.	Visual inspection
Fire Safety Health and Safety Legal Compliance	The Notification of the Ministry of Interior RE: Working Safety Relating to Harmful Chemicals, Chapter 1, Clause 6	Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits.	The factory did not prepare report on the safety and assessment of the hazardous chemical at least once a year and inform provincial labor official within 15 days of assessment.	Document reviewed	Yes			Factory must comply with local laws regarding chemical safety and should submit the necessary report to the provincial labor official. A copy of the report must be submitted to Reebok.	15-Feb-05	(Feb 22, 05) Factory submits a copy of the Sor Or 2 report to Reebok monitor.	(Mar 16, 05) Reebok monitor reviewed the Sor Or 2 cover sheet and names of chemicals that were submitted to the provincial labor official on January 25.	A copy of the so-called Sor Or 2.
Document Maintenance/ Accessibility	Nil	All documents required to be available to workers and management by applicable laws (such as policies, MSDS, etc.) shall be made available in the prescribed manner and in the local language or language spoken by majority of the workers if different from the local language.	In chemical stock balance report at 24/11/2004 showed that the factory has 2 chemicals composed of toluene such as Solvent 233 TXTC (D-Ply 233 TXTC) and Primer 224L-(2). It must be shown in the chemical dead stock such as Bond ACE 224L.	Document reviewed	Yes			Toluene is banned by Reebok and factory must confirm that it is not in use immediately. Additionally, factory must submit a plan for ensuring workers are not exposed to other hazardous substances and provide the name of the individual responsible for chemical management.	15-Jan-05	(Feb 22, 05) [Factory] submits a copy of report stating D-Ply 233 TXCT was destroyed and put it in deadstock report as of Jan 14, 2005.	Primer Bond Ace 224L-2 is not a banned chemical. According to MSDS of Bond Ace 224L-2, chemical contained of MEK (84-86% and Polyurethane (12-16%). No Toluene is listed as ingredients. Bond Ace 224L is a banned chemical and already shown as deadstock as reported by FLA. (Mar 16, 05) Based on visual inspection at chemical storage, chemical stock balance report and staff interview, there's no use of D-Ply 233 TXCT.	
PPE	The Notification of the Ministry of Interior RE: Working Safety Relating to Harmful Chemicals Chapter 2, Clause 21	Workers shall wear appropriate protective equipment (such as gloves, eye protection, hearing protection, respiratory protection, etc.) to prevent unsafe exposure (such as inhalation or contact with solvent vapors, noise, dust, etc.) to hazardous elements including medical waste.	Waterbased product composed of acetone such as Hardener WB-7075, Aquace PR-501 (acetone 15-20%) and UNI-DUR WB 7075 (acetone 12.5%). The factory provided PPE improperly.	Visual inspection	Yes			Factory must provide appropriate PPE for chemicals specified immediately. Factory must submit a plan to Reebok for ensuring all workers are provided with appropriate PPE and trained on its use and that supervisors are held accountable if workers do not use the equipment.	15-Jan-05	(17 Feb 05) Factory submits a list of PPE in workstations where required, and a copy of meeting minutes with supervisors on Feb 5 and 12, 05 to communicate the PPE policy and procedures.	(Mar 16, 05) As factory starts to set up system whereby supervisors are accountable to enforce use of PPE and ensure consistency, Reebok monitor will verify implementation in next visit. (April 4, 05) Reebok monitor verified that every supervisor now maintains a file to track when new PPE must be provided to worker. ISO team monitors whether workers are wearing PPE on a daily basis. If worker found to not be wearing the proper PPE, both worker and their supervisor will receive a warning letter from factory management.	List of PPE, visual inspection
PPE	The Notification of the Ministry of Interior RE: Working Safety Relating to Harmful Chemicals Chapter 1, Clause 14 "The employer shall provide wash basin for washing hands and face for the employees working with harmful chemical specifically for not less than 15 persons, and it shall be increased proportionately with the number of employees. Fraction of 15 persons if over 7 shall be considered as 15 persons."	Workers shall wear appropriate protective equipment (such as gloves, eye protection, hearing protection, respiratory protection, etc.) to prevent unsafe exposure (such as inhalation or contact with solvent vapors, noise, dust, etc.) to hazardous elements including medical waste.	The factory provided a wash basin for washing hands and face for the workers working with hazardous chemical is not enough and all of them are in toilet. The law stated that 15 workers per wash basin, the fraction of 15 workers if over 7 workers shall be considered as 15 persons.	Visual inspection	Yes			Factory must comply with local laws and install the necessary wash bins. Photos and details regarding the number and location of available wash bins should be submitted to Reebok.	31-Jan-05	(Mar 9, 05) Factory has submitted Human Rights and Safety Standards blueprint that contain information, i.e. locations of fire exits, fire extinguishers, toilets, washbasin, medical kits, etc. Reebok monitor will verify the blueprint and determine whether or not number of these items are sufficient and accessible for daily operation.	(Mar 16, 05) As determined from factory walkthrough and worker discussion, some workers report that they opt to wash their hands before lunch at tap water near dining area. X management therefore agreed to build 1 more washstation close to factory entrance to facilitate workers to wash their hands after work. Otherwise, washbasins, though in toilets, accessible on 2nd factory floor and warehouse. Deadline: Mar 31, 05. (April 4, 05) Reebok monitor verified new washstation has been completed.	Visual inspection.
Chemical Management	The Notification of the Ministry of Interior RE: Working Safety Relating to Harmful Chemicals Chapter 1, Clause 17	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.	The factory arranged training course on hazardous chemicals for few workers, specifically for workers who participated in ISO 14001 certification, but factory did not arrange for workers working with hazardous chemicals.	Visual inspection	Yes			Factory must submit plan to Reebok for training workers, appropriate to job responsibilities, in safe use of hazardous chemicals. This plan should include name of person responsible for ensuring all workers using hazardous chemicals attend training.	31-Jan-05		(Mar 16, 05) Factory submitted training records held by a supplier, for about 140 workers and supervisors from various workstations on safe use of chemicals during Nov 12 and Dec 14-15, 2004. Based on random of worker discussion, workers can recall training and are aware of emergency procedures for chemical exposures.	Training record review, worker interview
Evacuation Procedure	The Notification of the Ministry of Interior RE: Work Safety Connected with Boilers, Chapter 2, Clause 20	All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, unblocked aisles/exits, employee education, evacuation procedures, etc.) shall be complied with and workers shall be trained in proper safety, first aid, and evacuation procedures.	The factory did not provide an emergency lighting system that shines towards the 2 exits at boiler room.	Visual inspection	Yes			Factory must install appropriate emergency lighting and submit documentation to Reebok.	15-Jan-05		(Feb 22, 05) Based on visual inspection, factory installed emergency lighting that shines towards 1 exit in boiler room. (Mar 16, 05) Factory management agreed to provide 1 more emergency light at another exit in boiler room. Deadline Mar 31, 05. (April 4, 05) Reebok monitor verified additional emergency light provided.	Visual inspection.

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Safety Equipment	The Notification of the Ministry of Interior RE: Working Safety Relating to Protection and Prevention of Fire for Employees, Chapter 2, Clause 9	All safety and medical equipment (such as fire fighting equipment, first aid kits, etc.) shall be in place, maintained as prescribed and accessible to the employees.	All fire in workstation and in front of chemical storage extinguishers have been installed less than 1m. (The national law said each fire extinguisher installed high above working floor of not less than 1m, but not more than 1m and 40 cm.)	Visual inspection	Yes			Factory to determine if extinguishers are easily within reach of workers should an emergency occur. Extinguishers should not be so low that they are blocked by workstations. If extinguishers not accessible and visible, factory must move extinguishers as specified by local law.	15-Jan-05		(Mar 9, 05) Factory management ensures all fire extinguishers in workstations and in front of chemical storage installed at 1m high, measured at holder of fire extinguishers. Reebok monitor will do a visual inspection in next visit. (April 4, 05) Reebok monitor verified extinguishers installed at proper height.	Visual inspection.
Safety Equipment	The Notification of the Ministry of Interior RE: Working Safety Relating to Protection and Prevention of Fire for Employees, Chapter 2, Clause 9	All safety and medical equipment (such as fire fighting equipment, first aid kits, etc.) shall be in place, maintained as prescribed and accessible to the employees.	3 of 4 fire extinguishers in front of chemical storage have no details about type, method of application and tag for inspection.	Visual inspection	Yes			Fire extinguishers must be labeled with type of fire for which they are to be used, operating instructions and tagged to record monthly inspection. Factory must ensure all extinguishers properly labeled and investigate why individual accountable for inspecting the extinguisher on monthly basis failed to report that extinguisher was not tagged, etc. Results of investigation and plan for ensuring problem does not recur should be submitted to Reebok.	15-Jan-05	(Feb 22, 05) Factory reports that problems are fixed. To prevent problems from recurring, especially tag inspection not recorded, factory assigns HR staff to co-inspect fire extinguishers with suppliers, who visit the factory on a monthly basis.	(Mar 9, 05) Reebok monitor will verify factory's implementation on next visit. (Mar 16, 05) Based on visual inspection against factory's blueprint of safety items, there remain some fire extinguishers that have no information on type, operational instructions. Factory agreed to improve this by Mar 31, 05. (April 4, 05) Factory has completed operational instructions, but has not yet tagged extinguishers with information on type. Factory aims to complete this final step by Friday, April 8. (June 7, 05) Extinguishers appropriately tagged.	Visual inspection, factory blue print
Safety Equipment	The Notification of the Ministry of Interior RE: Working Safety Relating to protection and Prevention of Fire for Employees, Chapter 2, Clause 9	All safety and medical equipment (such as fire fighting equipment, first aid kits, etc.) shall be in place, maintained as prescribed and accessible to the employees.	At production line No. XXX, 1 extinguisher did not have tag for checking/inspection.	Visual inspection	Yes			Fire extinguishers must be tagged to record monthly inspection. Factory must ensure all extinguishers properly tagged and investigate why individual accountable for inspecting the extinguisher on a monthly basis failed to report that extinguisher was not tagged. Results of investigation and plan for ensuring problem does not recur should be submitted to Reebok.	15-Jan-05		(Mar 16, 05) As determined from visual inspection, factory posts tag of supplier inspection at all production lines. But, factory will replace supplier's tag with factory's tag from Mar 31 onwards. (April 4, 05) Factory has replaced supplier tags with internal version and will begin monitoring extinguishers internally as supplier monitoring has proven unreliable.	Visual inspection.
Machinery Maintenance	Nil	All production machinery and equipment shall be maintained, properly guarded, and operated in a safe manner.	No record of forklift driver training was found.	Document reviewed	Yes			Workers must be trained and supervised in safe performance of their assigned tasks before being allowed to operate machinery on their own. This training should be properly documented. Factory must provide plan for training all forklift drivers and ensuring no workers are allowed to operate fork lifts without training.	31-Jan-05	(Feb 17, 05) Factory submits copies of forklift driver training certificates for three employees on July 3, 2003.	(Mar 16, 05) Based on discussion with management, there are more staff responsible for forklift driving. Therefore, management agreed to facilitate a training course by external agency for these employees by end of April. In interim period, safety officer provided internal forklift driver training for 7 staff in February. A copy of training material submitted to Reebok monitor. (June 7, 05) Additional staff received training on April 26.	Training material, certificate on outside training
Sanitation in Facilities	The Notification of the Ministry of Interior RE: Welfare on Health and Hygiene for Employees, Clause 1 (4) (Notified on 16 April B.E. 2515)	All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with applicable laws.	Toilet facilities for males at 1st floor not clean, bad-smelling and no ventilation system. The factory provided toilet 33 units and bathroom 5 units, which does not comply with the law. The law stated below. No. of employee    No. of Toilet (persons) Less than 80                    3 Add every 50 persons        +1 700                                    16 2,075                                43  Note: At warehouse has 5 toilets, 1 bathroom. <del>Ground floor at middle part has 19 toilets, 2 bathrooms.</del>					Factory must submit plan for ensuring toilet facilities are clean, dry and free of odors. At minimum, they must be disinfected with bactericide twice daily and ventilated with an adequate exhaust system. Additionally, factory must comply with local law and Reebok standards regarding the appropriate number of toilet facilities and submit plan for adding toilets where necessary.	15-Jan-05		(Feb 17, 05) Based on visual inspection, factory installs 2 ventilation fans to improve toilet conditions in each toilet area. (Mar 16, 05) Based on visual inspection against factory's blueprint, there are total of 56 female toilets in use as follows: rubber pressing: 11, upper: 13, cutting: 6, clinic: 1, office: 3, stock-fitting: 15, warehouse: 7. For male workers, there are 23 toilets and 17 urinals, total number = 40. (April 4, 05) Factory has posted checklist of cleaning done by housekeeper twice daily of all toilets. Workers have confirmed satisfaction with cleanliness.	Visual inspection. Worker interviews.
Fire Safety Health and Safety Legal Compliance	The Notification of the Ministry of Interior RE: Committee on Occupations Safety, Health and Working Environment Chapter 1, Clause 7 (3) place of undertaking with 500 or more employees shall have not less than 11 committee members consisting of employer or employer's representative as chairman of committee, 4 representatives at command level and 5 employee representatives at operational level as committee members, whereby occupational safety officer shall be a committee member and a secretary. If number of committee members increases more than (1), (2) or (3) as case may be, there shall be committee members from representatives at command level and employee representatives at operation level increasing in equal pro rata.	Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits.	The ratio of employer and worker's representatives of the committee on occupational safety, health and working environment is not equal (employer's representatives: 4 and worker's representatives: 7).	Visual inspection	Yes			Under Thai law the ratio of employer and employee representatives must be equal. Therefore, [factory] must take measures to recruit more management representation.	31-Mar-05	(Mar 9, 05) Factory reports to revise the ratio of employer and worker's representatives to be equal in number.	(Mar 16, 05) Due to a structural change of senior management, factory will revise the structure of H&S Committee again. Deadline Mar 25, 05. (April 4, 05) Factory has appointed equal number of management representatives to the committee.	Interviews, written announcement submitted
<b>7. Freedom of Association and Collective Bargaining</b>												
Employers will recognize and respect the right of employees to freedom of association and collective bargaining.												
Employer Interference/Elections		Workers' organizations have the right to elect their representatives and conduct their activities without employer interference	All of the welfare committee members are from Supervisor level and some of the workers do not know and aware of worker representatives.	Welfare committee's document review.				This concern is already being addressed by the factory in conjunction with Reebok monitor. The factory is scheduled to an election in early 2005 and is working to encourage operational workers to apply as candidates.	31-Mar-05	(Mar 9, 05) Factory held an informal election of Welfare Committee on February 5th, through nomination of worker representatives from each division. This was to ensure worker participation from operational level. Factory submits names of a total of 12 Welfare Committee members, and a copy of the 1st meeting minutes between management and welfare committee on 26th February.	(Mar 16, 05) Reebok requests the factory to post on notice board the names and pictures of Welfare Committee, as well as their structures, roles and responsibility and meeting minutes. This will help workers know who are their representatives and what are their responsibility. Deadline: Mar 23, 05. (April 4, 05) Reebok monitor has confirmed posting.	Visual inspection.
<b>8. Wages and Benefits</b>												
Employers recognize that wages are essential to meeting employees' basic needs. Employers will pay employees, as a base, at least the minimum wage required by local law or the prevailing industry wage, whichever is higher, and will provide legally mandated benefits.												

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Record Maintenance	Labor Protection Act. B.E. 2541 Section 115 states that "The employer shall keep employee register for not less than 2 years as from data of termination of employment for each employee. The documents concerning payment of wage, overtime pay, holiday work pay ... shall be kept for not less than 2 years as from the day such monies having been paid."	All legally required payroll documents, journals and reports will be available complete, accurate and up-to date. (In United States terms, this would include W-4s, I-9s, green cards, 941s and supporting material.)	Payroll and attendance records only available for 4 months (Aug. to Nov. 2004 ) to review; thus, monitor could not check the employees' wages and benefits in the past of 12 months.	Management and HR staff interviewed, Payroll reviewed	Yes			All payroll records must be kept on site for at least 12 months. Factory must commit to maintaining these records at the facility.	15-Jan-05		(Mar 16, 05) Reebok monitor reviewed copy of payroll records between March 2004-February 2005. Factory commits to maintain these records at the facility. The factory hires an independent auditor to review these documents on regular basis, which explains why these records not available on date of audit.	Documentation was reviewed on March 16th.
Incentive System			There was a condition of payment in case as following: - All workers of team will be deducted their motivate money Baht 3/ pairs of shoes if quality of shoes in their line found as B-grade or C-grade. - If is something wrong in any production process and process has to add more raw material, workers of that process will be deducted their motivated money Baht 1/ pairs of shoes. Although, factory explained that wages were deducted but factory guaranteed all workers still received wages at minimum wages after deduction. However, auditor concerned that it's not fair for workers who can earn more than minimum wages. For example: today, this team can reach target so they earn more than minimum wages such as workers of this team receive Baht 250 on this day, but QC found pair of shoes is B-grade so this team deducted their money Baht 3. It means workers will receive Baht 247 on this day. On the other hand, if this team cannot reach target, they will receive wage at minimum wages (Baht 142). And QC found pair of shoes is B-grade so workers should be deducted wages Baht 3. It means workers will receive Baht 139, which is less than minimum wage. Since factory guarantees all workers will receive wages at minimum wages after deduction, factory does not deduct wages from this team. Auditor concerned that it's good for workers who received minimum wages and they will be not deducting their wages, but it's not fair for worker.	Payment permit, Daily payment report reviewed and HR officer interviewed.				The factory must obtain clarification from the Ministry of Labor and submit written confirmation that their production bonus and deduction system is acceptable under Thai law.	31-Mar-05	(Mar 9, 05) Factory is in the process of drafting a letter to seek a ruling from the Ministry of Labor, to determine whether or not such incentive reduction due to poor performance (B or C grades) is acceptable or against the spirit of the law. At a minimum, factory guarantees daily wage and applicable OT rates to all daily workers.	(Mar 16, 05) Factory submits a copy of letter dated March 9 that was sent to Ministry of Labor. (June 7, 05) Factory met with Ministry on May 13, 2005. Ministry requested factory present their case and plans to meet again with factory in mid-June. Reebok monitor is also meeting separately with Ministry and other brands in mid-June to obtain clarification on local law. (July 27, 05) No official response from Labor Ministry so far. (7 Mar 06) In an official letter from Labor Ministry, dated 9 Feb 06, ministry states generally that efficiency allowance paid to boost workers' morale not considered as wage. Therefore, it implies [factory's] production bonus and deduction system not against law. Overall, [factory] workers guaranteed daily minimum wage plus applicable OT premiums for all hours worked. Human resource/wage staff responsible for calculating wages for workers on a daily basis and ensure no wage paid less than applicable wage and OT premiums.	Copy of letter
Legal Compliance for Holiday/Leave		Workers will be paid for holidays and leave as required by law.	Factory used target rate by group to pay workers. Most workers received more than minimum wages. Their wages were guaranteed at minimum wage when producing lower than targets. However, auditor concerned factory calculated wages from each work unit performed on working day so its workers should be call piece-rate paid workers. In addition, piece-rate paid workers should receive wage for holiday or day of leave in an amount equivalent to average daily wage rate that workers receive during payment period prior to such holiday or day of leave. And in case where employer requires workers to work on holiday, employer shall pay holiday pay to workers not less than double the rate for work units performed in normal working days for work done for workers who are paid on a basis of work units performed.	Payroll record, Time record, Overtime sign-up sheet, Leave record, Payment permit, Daily payment report reviewed and HR & management interviewed.				The factory must obtain clarification from the Ministry of Labor and submit written confirmation that their ELO target system is acceptable under Thai law.	31-Mar-05	(Feb 1, 05) According to management, target system aimed at accurately judging the efficiency for making each shoe, then gives targets and rewards (incentives) to those production lines that operate as a team to hit or exceed those targets. Factory says this is not a piece-rate-paid system. (Mar 9, 05) Factory is in the process of drafting a letter to seek a ruling from the Ministry of Labor, to determine whether or not such the target system is acceptable or against the spirit of the law.	(Mar 16, 05) Factory submits copy of letter dated March 9 that was sent to Ministry of Labor. (June 7, 05) Factory met with Ministry on May 13, 2005. Ministry requested that factory presents their case and plans to meet again with factory in mid-June. Reebok monitor is also meeting separately with Ministry and other brands in mid-June to obtain clarification on local law. (July 27, 05) No official response from Labor Ministry to date. (7 Mar 06) In an official letter from Labor Ministry, dated 9 Feb 06, Ministry states generally that efficiency allowance paid to boost workers' morale not considered as wage. Therefore, it implies [factory's] ELO target is not against law. Overall, [factory] workers guaranteed daily minimum wage plus applicable OT premiums for all hours worked. HR/wage staff are responsible for calculating wages for workers on daily basis and ensure no wage paid less than applicable wage and OT premiums.	Copy of letter
Deduction for Services		Deductions for services to employees will not exceed the cost of the service to the employer. If questioned, employers will demonstrate the reasonableness of these charges.	There was column of dormitory fee deduction display in pay slip. However, auditor did not find any workers were deducted for dormitory fee showing in payroll.	Pay slip and payroll record reviewed .				Factory must explain why dormitory fee deduction does not appear in payroll and work with Reebok monitor to ensure workers are protected from inappropriate payroll deductions.	1-Feb-05	(Jan 7, 05) As determined from management interview and document review, factory deducts wages from workers who rent flat room owned by *** Holding Company. As it is an agreement between the 2 factories, each factory, including this factory, has to collect money from these workers to pay for another factory to ensure workers are from their facility.	(Mar 9, 05) From February onwards, factory doesn't deduct money from payroll, but collects cash from these workers for flat room rental fees, and issues receipt. (Mar 16, 05) As determined from February payroll, there is no deduction on dormitory rental fees. Factory maintains on site copy of receipt for workers who pay for dormitory fees.	Documentation review.
Legal Compliance for Holiday/Leave	Labor Protection Act BE 2541 Chapter 2 Section 32 and Chapter 5 Section 57:	Workers will be paid for holidays and leave as required by law.	Some workers informed they have to submit doctor's certificate when took sick leave for even 1 day; otherwise, they will be not compensated.	Workers interviewed.				While Reebok does not specifically prohibit such policies, factory must submit evidence that policy communicated to workers in advance. Also, factory should develop internal procedures that allow workers to voice complaints if they are not compensated properly.	31-Mar-05	(Jan 15, 05) Factory communicates sick-leave policy in worker handbook, which explains workers entitled to 30 sick leave days/year (with paid) as long as they are sick. Factory will develop written procedure that allows workers to voice complaint if they are not paid for sick leave.	(Mar 9, 05) Reebok monitor will verify in next visit factory's implementation and check payrolls in which sick leave without doctor certificate is paid. (Mar 16, 05) As determined from January-February payrolls and leave records, there is evidence that factory paid for sick leave, although doctor certificate not submitted. (April 1, 05) Factory implemented procedures to ensure continued compliance. Each time supervisor changes status of worker leave from "sick" (paid) leave to "personal" (unpaid) leave, HR staff notifies a higher level manager to investigate classification and ensure all eligible sick leave is paid.	Documentation review. Interviews.
Deduction for Services		Deductions for services to employees will not exceed the cost of the service to the employer. If questioned, employers will demonstrate the reasonableness of these charges.	The workers will be fined to replace the new PPE if they could not return the residual PPE.	Workers interviewed.				While Reebok does not prohibit charging workers for loss of factory property, factory must submit evidence that 1) workers provided PPE initially free of charge, 2) charge for loss of PPE written into factory policies and communicated to workers and 3) charge for lost PPE is no greater than cost paid for equipment by factory.	31-Mar-05	(Mar 9, 05) Factory has recently started to set up system whereby production supervisors are responsible for enforcing use of PPE and replace new PPE when required. It is expected this will solve root cause of problem, to ensure workers wear and don't forget to wear PPE on a daily basis.	(Mar 16, 05) Factory submits copy of revised PPE policy and procedures, effective 1 Feb 05, saying workers shall be provided PPE initially free of charge. Concerned department shall submit numbers of items in need every 15th day of month. Residue shall be submitted for replacement of new PPE. Charge for loss of PPE written in worker handbook, saying that if worker loses their PPE, factory does not charge workers more than original cost of PPE.	Copy of PPE policy and procedures.

Findings												Remediation		
FLA Code/Compliance Issue	Country Law/Legal Reference	FLA Benchmark	Monitor's Findings	Documentation (If Finding Corroborated/Verified Via Multiple Sources, List All)	Was Finding Corroborated? Yes or No	If Not Corroborated, Explain Why	Best Practice	PC Remediation Plan	Target Completion Date	Factory Response (Optional)	Company Follow Up (Cite Date of Follow Up)	Documentation		
Wage Benefits Awareness		Employers will communicate orally and in writing to all employees in the language of the worker the wages, incentive systems, benefits and bonuses to which all workers are entitled in that company and under the applicable law.	Some workers interviewed do not know how to calculate their overtime wages since guaranteed minimum wage will be paid to workers when they can't complete target by group. For example, 1st target has 816 pairs of shoes supposed to be finished at sewing line and workers will get paid 220 Baht for this target. Workers informed that they are required to finish the target assignment even they have to work until 6 o'clock. However, paying of 220 Baht covered wage of overtime hours until 6.00 p.m. Reversibly, some workers attempted to complete their target even worked overtime later until 8.00 p.m. However, workers shall be informed how to calculate overtime wages in case overtime working is required.	Workers interviewed.				Factory must ensure workers are trained regarding wage policies and that all policies are included in worker handbook. Factory must submit a plan to Reebok on how to better communicate wage calculations to workers.	15-Jan-05		(Jan 15, 05) Based on visual inspection and HR staff interview, factory posts wage calculation system, including applicable overtime rates on notice board. Worker handbooks with all wage policies distributed to all workers including new workers during orientation. Under factory's existing system, daily wage reports are distributed to all production lines so workers able to verify how much they earn on daily basis. (Mar 9, 05) Factory submits meeting minutes with supervisors (12 Feb 05) and workers (following week) from stitching, cutting, assembly and stock-fitting about applicable wage rates per hours worked. (Mar 16, 05) Based on random worker discussion, workers roughly understand target system and applicable wages and OT premium rates. Reebok monitor requests factory to develop written target and incentive structures in worker's simple language and submit to Reebok. (April 4, 05) Written target and incentive structure completed. Factory has committed to posting this information for worker awareness. (June 7, 05) Factory posted information on wage structure and committed to conducting weekly meetings with workers to explain wage calculation.	Visual inspection. Worker and manager interviews. Target and incentive structure documents.		
<b>9. Hours of Work</b>														
Except in extraordinary business circumstances, employees will (i) not be required to work more than the lesser of (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture or, where the laws of such country will not limit the hours of work, the regular work week in such country plus 12 hours overtime; and (ii) be entitled to at least one day off in every seven day period.														
Legal Compliance with Protected Workers	Labor Protection Act BE.2541 Chapter 2 Section 27:	The factory will comply with all applicable laws governing work hours, including those regulating or limiting the nature and volume of work performed by women or workers under the age of 18.	Some working groups, particularly assembly line, worked on lunch time from 11:30-12:00 without taking rest for 1 hour.	Visual inspection, workers interviewed.	Yes			Factory must ensure every worker takes mandatory breaks and submit plan to Reebok. Some suggestions for monitoring breaks taken by workers are to have each worker clock in and out for lunch or instituting a power shutdown on production lines.	15-Jan-05	(Jan 15, 05) Factory management agrees to shutdown power during lunch time (11-12:00 AM.) for 45 minutes so workers can take reasonable break. The practice is still ongoing.	(Mar 9, 05) Reebok monitor will follow up factory's implementation in next visit, to determine together with [factory] management steps to be taken to ensure consistent compliance. (April 4, 05) Factory found to have ceased power shutdown as workers continued to work throughout lunch (even without lighting) and have complained about new procedure. Reebok to discuss issue further and determine more appropriate solution. (June 7, 05) Reebok still working with senior management to determine a solution. (July 27, 05) Factory issued energy saving policy which results in ceasing power shutdown on production floor during lunch break. The policy, effective on July 25, 05, was endorsed by top management.	Visual inspection, worker interview		
Overtime Limitations	Labor Protection Act BE.2541 Chapter 2 Section 28:	Except in extraordinary business circumstances, employees will (i) not be required to work more than the lesser of (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture or, where the laws of such country will not limit the hours of work, the regular work week in such country plus 12 hours overtime; and (ii) be entitled to at least one day off in every seven day period. An extraordinary business circumstance is a temporary period of extra work that could not have been anticipated or alleviated by other reasonable efforts.	Sunday work was revealed on November 21, 2004; thus, workers worked consecutively 13 days without rest. Noted: Management stated that factory informed the Sunday working to PC to get approval.	Attendance records and Production & B-Grade report, Worker and Management interviewed.	Yes			[Factory] should manage working hours to ensure that workers receive at least 1 day off in 7. Should a worker need to work on Sunday, [factory] must guarantee they receive compensatory rest day. Finally, [factory] should submit working hour reports to Reebok monitor for review on a monthly basis.	15-Jan-05	(Jan 5, 05) [Factory] management got approval from Reebok for Sunday work on 21 November in order to meet with PO's loading target. Therefore, working hours were in excess of 60 hrs/week. As a result, [factory] compensated a holiday for these workers on Saturday 27 November, with pay. Reebok monitor maintained documented request form from factory management in the factory's file.	(Mar 9, 05) From 2005 onwards, factory didn't request Sunday work from Reebok. A monthly working hours report submitted regularly (every 5th day of following month) and no Sunday work reflected. (Mar 16, 05) As determined from production report output during Jan-Feb 2005, and worker interview, there was no Sunday work.	Monthly working hour reports. Request form to work in excess of 60 hours/ week due to extraordinary circumstances.		
Overtime Limitations	Nil	Except in extraordinary business circumstances, employees will (i) not be required to work more than the lesser of (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture or, where the laws of such country will not limit the hours of work, the regular work week in such country plus 12 hours overtime; and (ii) be entitled to at least one day off in every seven day period. An extraordinary business circumstance is a temporary period of extra work that could not have been anticipated or alleviated by other reasonable efforts.	Some workers' work exceeded 12 hours per week on October 2004. OT was 13-22.5 hours per week and November 2004 was 15-19 hours per week.	Attendance records reviewed, Worker interviewed.	Yes			[Factory] should manage working hours to ensure workers do not work over 60 hours per week. As Reebok has system in place to ensure we are notified should hours exceed 60 per week, [factory] must provide evidence to clarify whether they applied for 1 of the 2 allotted waivers per year during period specified by external monitor. Finally, [factory] should submit working hour reports to Reebok monitor for review on a monthly basis.	15-Jan-05	(Jan 5, 05) Factory management got approval from Reebok for Sunday work on 21 November in order to meet with PO's loading target. Therefore, working hours were in excess of 60 hrs/week. As a result, factory compensated a holiday for these workers on Saturday 27 November, with pay. Reebok monitor maintained a documented request form from factory management in the factory's file.	(Mar 9, 05) From 2005 onwards, factory didn't request Sunday work from Reebok. A monthly working hours report is submitted, and excessive working hours are not reflected from the report. (Mar 16, 05) As determined from the production report output during Jan-Feb 2005, the working hours are within 60 hours/week.	Monthly working hour reports. Request form to work in excess of 60 hours/week due to extraordinary circumstances.		
Legal Compliance with Protected Workers	Labor Protection Act BE.2541 Chapter 2 Section 27:	The factory will comply with all applicable laws governing work hours, including those regulating or limiting the nature and volume of work performed by women or workers under the age of 18.	Some working groups worked continually without break 20 minutes before overtime work.	Overtime permit sheet reviewed	Yes			Factory must ensure every worker takes mandatory breaks and submit a plan to Reebok. Some suggestions for monitoring breaks taken by workers are to have each worker clock in and out before overtime shift or instituting a power shutdown on production lines.	15-Jan-05	(Jan 15, 05) Factory management agrees to shutdown power during lunch time (11-12:00 AM.) for 45 minutes so workers can take reasonable break. Practice is still ongoing.	(Mar 9, 05) Reebok monitor will follow up factory's implementation on next visit, to determine together with [factory] management steps to be taken to ensure consistent compliance. (April 4, 05) Factory found to have ceased power shutdown as workers continued to work throughout lunch (even without lighting) and have complained about new procedure. Reebok to discuss issue further and determine more appropriate solution. (June 7, 05) Reebok still working with senior management to determine solution. (July 27, 05) Factory issued energy saving policy which results in ceasing power shutdown on production floor during lunch break. The policy, effective on July 25, 2005, was endorsed by top management.	Visual inspection, worker interview		
<b>10. Overtime Compensation</b>														
In addition to their compensation for regular hours of work, employees will be compensated for overtime hours at such premium rate as is legally required in the country of manufacture or, in those countries where such laws will not exist, at a rate at least equal to their regular hourly compensation rate.														
<b>Miscellaneous</b>														



FLA Code/Compliance Issue	Country Law/Legal Reference	FLA Benchmark	Findings					Remediation				
			Monitor's Findings	Documentation (If Finding Corroborated/Verified Via Multiple Sources, List All)	Was Finding Corroborated? Yes or No	If Not Corroborated, Explain Why	Best Practice	PC Remediation Plan	Target Completion Date	Factory Response (Optional)	Company Follow Up (Cite Date of Follow Up)	Documentation
Unauthorized Subcontracting			Some parts of productions are utilized to the central facility such as footwear molding, sole and brand label; therefore, no PC approval document was revealed.	The management informed that some time they forgot to complete the documents.				(Jan 15, 05) According to Reebok procedures, Reebok doesn't monitor molding and label facilities where there are less than 10% of Reebok production. As for midsoles subcontractors, Reebok monitors the subcontractors.				
Other			No overseeing and following hiring procedure from personnel division, since some employee applications did not have signatures from personnel division. And probation employment contract of some workers did not have signature from authorized person. This may lead to incomplete or missing important documentation records verifying the new workers.	The management informed that some time they forgot to complete the documents.				Factory should submit a plan to improve all hiring procedures and name of the person(s) responsible for their implementation.	15-Jan-05	(Jan 15, 05) Factory reports to review and have an HR authorized signature sign employee application forms and probation employment contract.	(Mar 9, 05) Reebok monitor will verify factory's implementation in next visit and communicate need of improving hiring procedures. (Mar 16, 05) As determined from document review, HR recruitment staff signed their names in application forms, but not all of probation employment contract. Factory is in a process of revising existing hiring procedures, to determine name of HR staff accountable for signing the probation employment contract as factory's authorized person. Deadline for submission: Mar 21, 05. (April 4, 05) Beginning March 15, factory designated appropriate staff and hiring procedures have been revised.	Visual inspection.