FLA Audit Profile			Independent External Verification	Independent External Verification										
Country Factory name	Bangladesh 38020586D		angladesh actory Name: 38020586DV	Bangladesh 38020586DVV										
IEM Date(s) in facility	LIFT Standards Ltd. July 30-31 & August 2 a		nulki eptemebr 12, 2007	Level Works Limited June 15- 16, 2009										
PC(s) Number of workers	948	Outdoor Cap Company To	op of the World	Top of the World										
Product(s) Production processes	Caps and Hats Cutting, sewing and fini	nishing												
FLA Code/ Compliance issue	Country Law/Legal Reference	FLA Benchmark	IE Non-compliance Risk of Non-compliance	M Findings Evidence of Non- If not corroborated, Sources/Documentation Notable Features	s PC Remediation plan	Target	Remediation Factory Response (Optional) Company follow up (Cite date of	ocumentation Company Follo	es (Cite Date of Follow up)	Third Party Verificati		Follow up Third Party Verification Documentation Third Party Verification Sources/Documentation		rification Follow up Documentation
· · - · · · · · · · · · · · · · · · · ·	······································			compliance explain why used for corroborating implemented by (uncorroborated) Factory		Completion Date	follow up)			(IEV: September 12, 2007)		(IEV: June 15-16, 2009) for corroborating		
				Management or Company										
1. Code Awareness		FLA Principle of Monitoring, Obligation of Wo		Workers and	Outdoor Cop and Top of the World (ODC/TOW) request factory		Factory will send photos of the training of The factory sent photos of workers			Compliance officer produced echodules for training	s Review of training schedule, Factory does periodic	Complete: Regular monthly Training document revie		
Worker/management awareness of Code			d its purpose. No formal training system		to send your records of workers being trained in every work station. ODC/TOW require detailed notes of this training and	August 2006	Code of Conduct. They will also send notes of the training and signed		CoC meetings held for employees and	conducted during the last 12 months with the signature of workers on them. But workers and	interview with compliance and trainingsign in sheets for welfare officer, worker training to be submitted to	training is conducted and workers and manageme workers (especially old workers) interview		
		inform their employees about the workplace standards orally and through the posting of standards in a prominent place (in the local		records reviewed	signed documentation of workers that attended the training. ODC/TOW request factory to send picture of supervisor that trained workers and his signed documentation of training for our	t	documentation from workers that took the training by the first week of August 2006.		employees that	Il trainers in-charge informed the monitors that only fir evacuation and fire fighting training were conducted on a regular basis. Workers are still not aware of the		found aware of the code provision and factory rules like leave entitlement, OT calculation,		
		languages spoken by employees and managers) and undertake other efforts to			 Send us pictures of suggestion/grievance boxes for workers in 					factory rules and Code of Conduct.		disciplinary systems etc.		
		educate employees about the standards on a regular basis.			the factories and advise how many boxes are available and the location of these boxes.									
					 Advise who is in charge of collecting the suggestion/grievances from these boxes and how often are they collected. Send us procedures of how the suggestions/grievances are 	es								
					handled so that they can be resolved for the worker.									
Confidential non-compliance reporting channel		FLA Principle of Monitoring, Obligation of Companies: Develop a secure The report	ere is no confidential non- compliance porting channel that exists in the factory.	workers and management interview	ODC/TOW requests factory to send us pictures of suggestion/grievance boxes for workers in the factories and		Factory will send pictures of The factory sent photos of suggestion/grievance boxes, guantity of suggestion boxes.		Factory sent photos of suggestion/grievance	11 0	Interviews with the workers Workers can contact our and welfare officer, review of local auditor for	Incomplete: A secure reporting Visual inspection and we channel to contact the company interview.	orkers COMPLETE 09/24/09 WCRC posters placed in	Examples of the poster and a photo of this displayed in the factory are uploaded at
		communications channel, in a manner appropriate to the culture and situation, to		and recording system reviewed	advise how many boxes are available and the location of these boxes.	c	boxes, location of boxes along with documents of procedures of how		boxes in place and procedures for how	because they think the complaint boxes placed in the toilet do not resolve the workers' problems. Monitors	complaint file. number and email are	was not found. Workers were found unaware of the	various locations in worker areas.	the FFC site.
		enable Company employees and employees of contractors and suppliers to report to the Company on noncompliance with the			• ODC/TOW requests factory to advise who is in charge of collecting the suggestion/grievances from these boxes and how often are they collected.		suggestion/grievances are collected and handled.		are collected and	also noted that no complaint was recorded in the complaint register for the last few months. Complaint and suggestion boxes were opened by the welfare	posted at the factory.	communication channel i.e. contact number and email of the company representative.		
		workplace standards, with security that they shall not be punished or prejudiced for doing			• ODC/TOW requests factory to send us procedures of how the suggestions/grievances are handled so that they can be resolved				are on file at the PCs.	officer on a fortnightly basis, although as per remediation plan they have to be opened by Worker				
		SO.			for the worker.					Welfare Committee (WWC). The confidential non- compliance reporting channel was not functional.				
5	orced labor, whether in the form	n of prison labor, indentured labor, bonded												
labor or otherwise Employment Records		Employers will maintain sufficient hiring and World employment records to demonstrate and letter	orkers are not provided with appointment er and confirmation letter. The letters are	Workers interview and management interview	 The factory must give each employee an appointment letter an confirmation letter as required by local law. A copy of the letters 			ne factory sent 5 es of employee		All the personnel files contain appointment and confirmation letter (if probation period is completed)	Review of worker personnel files, management interview,	Complete: Personnel files are Personnel files review and complete and it takes one week interview new workers.	nd	
		verify compliance with this Code provision sign	ned by the workers and only kept in the rsonnel files. Some documents are not	and records of personnel file reviewed	will be kept in the employee's personnel files at all times. Management must sign both the appointment letter and	c la	confirmation letter as required by local law. The factory is also keeping a copyletters on 10/31/05, showing management signatures andapp tion	intment/confirma etters on		duly signed by the authorized personnel and the workers. At present it takes almost one month to	interview with several newly recruited workers and review	to complete the new personnel files.		
		no c	nsistent: 8 - No appointment letter, 1person - confirmation letter, 5 appointment letter hout sign of management, Employment		confirmation letter. The original appointment and/or confirmation letters should include the statement, "I, employee name, have read and received a copy of this letter." Have the employee sign	f	files at all times. Will send requested mar	I/05, showing agement itures and		complete one personnel file. No workers were terminated within the last 12 months.	of workers attendance register.			
		con mar	ntract does not contain signature from inagement, No settlement paper for the		and date the letter. Give a copy to the employee for their records. This is to be implemented immediately for all		5	byee signatures.						
			minated workers. Moreover it takes at least 3 onths' time to complete one personnel file.		appointments and new hires. The factory is to send at least 5 copies of the newly signed confirmation/appointment letters to ToW/ODC by Nov 1, 2005.									
Employment Records		Employers will maintain sufficient hiring and employment records to demonstrate and verify compliance with this Code provision		Personnel File review and worker interviews	The factory shall immediately have the service book, appointment letter including break-down of wages, an age and fitness certificate completed upon hiring an employee. Send Top of the	11/15/2005 b	The factory is now giving the service book, appointment letter including break- down of wages, an age and fitness Factory has sent copies of services books, appointment letters, etc. to satisfy this request. Dec. 05.	appointment		At present it takes almost one month to complete one personnel file.	eReview of worker personnel files, management interview, interview with several newlyVerification of length of time to complete personnel filefactory to	Complete: It takes one week to complete the new workers' personnel files.	nd	
					World/Outdoor Cap 5 copies of new employees service books, appointment letters including break-down of wages, an age and	C	certificate completed upon hiring an employee. Will send requested items by				recruited workers and review of workers' attendance personnel filesby 5/09.			
Employment Records		Employers will maintain sufficient hiring and Cor employment records to demonstrate and and	ntract papers are not complete. Reviewed d found 5 contract papers and 1 contract	Attendance record review and	fitness certificate, by November 1, 2005.The factory management must sign all employee contracts; the employee must also sign the contract. Keep a copy of the		11/1/05. Both the factory management and the employees are signing all employee Factory has sent copies of services books, appointment letters, etc to and			At present factory does not employ any persons on contractual basis. The monitors found that no	register.	Complete: All the contract papers Personnel files review. and personnel files found		
		verify compliance with this Code provision colle	lected where management signature does t exist. Documents are not consistent: 8 - No	management interview and personnel files	contract in the employee's files and give a copy of the contract to the employee. This is to go into effect immediately. Please send	t to condition of the c	contracts. The factory is keeping a copy satisfy this request. Dec. 05. letter of the contract in the employee's files	s kept in files.		workers were employed on a contractual basis durin the last 12 months.		complete.		
		lette	pointment letter, 1person - no confirmation er, 5 appointment letter without signature of unagement. Employment contract does not	reviewed, worker interview	Top of the World/Outdoor Cap 5 copies of employee contracts with employee and management signatures by November 1, 2005		and giving a copy of the contract to the employee. Will send requested items by 11/1/05							
		con	tlement paper for the terminated workers.											
3. Child Labor	at an age younger than 15 (or 14	4 where the law of the country of manufacture		Image: second se										
		education in the country of manufacture where												
Age Documentation		documentation for all workers, such as a job	orkers' age certificates are issued after the application date and joining date.	Personnel files and age documentation	The factory must make age determination prior to the employees joining date with the factory. This age determination must be	1	Factory Response:The factory sent 5 copies of age determination certificates. We areThe copies	es of age		Monitors found that up until December 2005 all the age verification certificates from doctors were issue	d nurse; review of workers'	Complete: Age and fitness Certificate are issued on or Personnel files review.		
		birth certificate, which verifies date of birth.		reviewed and interviewed the certification process	documented in the employee files. This is to be implemented immediately for all new hires. Send Top of the World/Outdoor Cap 5 copies of age determination of newly hired employees by	a	prohibited. Normally the factory takes age determination certificate prior to the employees joining date. This age	icates on		after the worker started working. During the period of January to December 2006 some age verification certificate were issued upon hire and some 2-3 days		before the joining of the new workers.		
				with management and nurse	November 1, 2005.	c e	determination also documented in the employee files. We will send all send by December 15, 2005. gave police	TOW copies of and		later. But since January 2007 the age certificate of newly recruited workers has been issued on or				
								edures ember 05.		before the joining date of the respective workers.				
Childcare facilities	in a separate building/place	Childcare facilities will not physically overlap The with production areas, and children will not prer	emises on 4th floor.	Visual inspection and workers interview and training system guarry	The factory must ensure that the childcare facility is clearly away from any production area. The childcare facility must be kept	1	Factory Response: The factory did not send remediation Now it is impossible to us for shifting the items by 11/1/05, asking that it be childcare center from the production childcare conter from the production	ODC to discuss chi issue with factory		Welfare officer has not provided any information on childcare facility to workers. Some workers know that there is a room for childcare but it is not used for the	at Management Interview and been cleared but is still	Incomplete: Childcare facility is not functional and still in the main factory building on 4th floor. The	Immediate discussion of the child-care	Photos are sent to FLA for review.
	floor.	as a wor	e childcare facility is not functional and used a casual storage for dresses/uniforms of the rkers.	training system quarry with management	clear of all obstacles that are not related to childcare. The factory must now promote the use of the child care facility to the employees. We recommend the factory contract with Lift-	f f	childcare center from the productiongiven to TOW on December visit.floor. But in the future, we shall try to shiftFactory is no longer using room forchild care from the production floor. Nowstorage, but not utilizing as child	management at Feb ODC toured child c which is located in	care facility	there is a room for childcare but it is not used for the purpose. Childcare facility was still not moved to a different location.	at Visual Inspection. not in use. Target completion date: 11/09	factory building on 4th floor. The childcare center was found empty without any one	facility with factory management implemented as soon as the audit findings were given to the PC. A new	
			children were found in the center and rkers are unaware about the facility and its		Standards to complete a consultancy training to help bring many different areas of the factory into compliance, by doing this the	e c	the factory promotes the use of the child care facility to the employees. We are 05	production facility, are enrolled in child	d care			responsible (caretaker) for the room. Moreover one child was	room was created and equipped for the facility and child-care was resumed	
		adva	vantages.		female workers will be asked what would make the child care acceptable for them and then this information would be brought to management for further discussion. Send Top of the	t to c	taking the necessary actions to make day care center functional. We shall send information about the day care center by	facility at this time. updates have been of 10/17/06.				found inside the factory building ground floor who was a nephew/ orphan of a worker who works on	formally in November 2009. Certified staff were hired to work in this facility a it is operating now.	nd
					World/Outdoor Cap the training date that is confirmed with Lift- Standards for the consultancy training by November 1, 2005, see	1	11/1/2005.					the 5th floor of the building, which is a sister concern of the		
					attached information regarding this program.							factory (same owner). With the intervention of the auditor the child was placed in the child care		
												room for the time being.		
Children on the Premises (New findings)												New Findings: One child Visual observation and (orphan and nephew of a loader) workers interview.	New policies have been implemented wi	Photos are sent to FLA for review.
												was found inside the factory on the stairs and cutting section area while the childcare center	the factory staff and management outlining the concern over children bein on the premises. The new child-care	g
												remain empty without any attendance or guard. The child	facility is open now and will provide a safe location for all children to be	
												was playing on the ground floor who was a nephew/ orphan of a worker, who works on the 5th	supervised if they must accompany an adult to the building.	
												floor of the building which is a sister concern of the factory		
												(same owner).		

FLA Code/ Compliance issue Co	Country Law/Legal Reference	e FLA Benchmark	IEM F Non-compliance Risk of Non-compliance	Evidence of Non- compliance (uncorroborated) If not corroborated, explain why Sources/Documentation used for corroborating Notable Features implemented by Factory Management or Company	PC Remediation plan	Target Completion Date	Remediation Factory Response (Optional)		pdates (Cite Date of Follow up) y Follow up Documentation	Third Party Verification Third Party Verification (IEV: September 12, 2007)		Company Verification Company Follow up	•	Company Verification Follow Company Follow up (August-November 2009)	w up Documentation
4. Harassment or Abuse	ith respect and dignity. No	employee will be subject to any physical,													
Progressive Discipline		Employee will be subject to any physical, Employers will utilize progressive discipline, e.g., escalating discipline using steps such as verbal warning, written warning, suspension, termination. Any exceptions to this rule, e.g., immediate termination for theft or assault, shall be in writing and clearly communicated to the workers.		Management interview and workers interview	The factory will attend a training of supervisors/management on treatment of employees and disciplinary actions. We are sending the training outline from Lift-Standards and we, Top of the World/Outdoor Cap, fully recommend that [factory] contract with Lift-Standards Ltd. to complete this training program which consist of 2 days disciplinary and CoC training and a consultancy 4 months program. See attached list of disciplinary procedures as a reference of what your system should resemble. Please send Top of the World/Outdoor Cap the factory's revised policies and procedures relating to discipline by and a set date for the training November 1, 2005.	11/1/200	5 Factory Response: The factory is arranging training programs for supervisors/management on treatment of employees and disciplinary actions. We will send revised policies and procedures and a confirmed training date by 11/1/05.	The factory has chosen not to hire Lift Standards Ltd. for the training. They have hired a person to help the factory become compliant. The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. Factory has established and posted disciplinary policy and procedures. Training has occurred for management. Training to be provided to the workers the month of			training schedule, train management and workers train interview. TOW	ory does periodic ingsign in sheets for ing to be submitted to / 5/09.	Complete: Disciplinary policy and procedure has been established and worker training is conducted on the above mentioned issues.		
Progressive Discipline		Employers will utilize progressive discipline, e.g., escalating discipline using steps such as verbal warning, written warning, suspension, termination. Any exceptions to this rule, e.g., immediate termination for theft or assault, shall be in writing and clearly communicated to workers.		Image: state of the state	According to the law "The Employment of Labor (Standing Orders) Act, 1965", the employer is authorized to terminate a worker if s/he is absent from work for more than 10 days without prior permission or information to the management provided that upon the return the workers is not able to give a justified explanation. In this case a registered letter will be sent to the temporary and permanent address of the worker with the information of loss of lien and request to report with a given date. If a report is submitted as outlined in a registered letter, s/he can be lawfully terminated. The factory shall immediately start complying with local law and shall amend the worker handbook to state as such. Please send Top of the World/Outdoor Cap a copy of the revised employee handbook translated into English and in local language highlighting this change.		local law and shall amend our employe	July 2006. ith The factory has chosen not to hire Lift Standards Ltd. for the training. They have hired a person to help the factory become compliant. The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. Factory has established and posted disciplinary policy and procedures. Training has occurred for management. Training to be provided to the workers the month of July 2006. DDC to discu will be given to ODC to discu will be given to ODC to discu	5 , 5	including "The Employment of Labor (Standing	management; review of train workers' personnel files, leave train register and worker TOW handbook.	ingsign in sheets for	Complete: No such termination case due to absence could be identified and workers informed that factory has stopped informally communicating the policy. Factory issue warning letter or follow disciplinary system in case of such absence. Documents review and workers interview.		
Disciplinary Practices		disciplinary practices that are applied fairly among all workers	No disciplinary policies and procedures are found in effect in the factory. Only document maintained on disciplinary action is the warning letter. Some warning letter found where the reason of issuing the warning letter is not mentioned or ticked. In one letter there were 3 warnings issued at the same time, ending in termination without any justification.	Workers interview and personnel warning letters	The factory will attend a training of supervisors/management on treatment of employees and disciplinary actions. We are sending the training outline from Lift Standards Ltd. and we, Top of the World/Outdoor Cap, fully recommend that [factory] contract with Lift Standards Ltd. to complete this training program which consist of a 2 day disciplinary and CoC training and a consultancy 4 months program. See attached list of disciplinary procedures as a reference of what your system should resemble. Please send Top of the World/Outdoor Cap the factory's revised policies and procedures relating to discipline by and a set date for the training November 1, 2005.		5 Factory Response: The factory is arranging training programs for supervisors/management on treatment of employees and disciplinary actions. We will send revis policies and procedures and a confirm training date by 11/1/05.	factory become compliant. and TOW. ed The factory did not send remediation	U U U	on disciplinary action. However, the factory has not hired any outside consultant to provide training on treatment of employees and disciplinary action as	training schedule, interview train with management and train workers, review of workers' TOW personnel files.	ingsign in sheets for ing to be submitted to	Complete: Disciplinary policy and procedure has been established and worker training is conducted on the above mentioned issues. Reason for disciplinary action is indicated on the warning letters.		
Training of Management in Disciplinary Practices		Employers will provide training to managers and supervisors in appropriate disciplinary practices	No formal training is provided on disciplinary procedures.	management and workers interview	The factory will attend a training of supervisors/management on treatment of employees and disciplinary actions. We are sending the training outline from Lift-Standards and we, Top of the World/Outdoor Cap, fully recommend that [factory] contract with Lift-Standards to complete this training program which consist of a 2 day disciplinary and CoC training and the a consultancy 4 month program See attached list of disciplinary procedures as a reference of what your system should resemble. Please send Top of the World/Outdoor Cap the factory's revised policies and procedures relating to discipline by and a set date for the training November 1, 2005.		5 Factory Response: The factory is arranging training programs for supervisors/management on treatment of employees and disciplinary actions. We will send revis policies and procedures and a confirm training date by 11/1/05.				interview management/ train supervisor and workers. train TOW	ory does periodic ingsign in sheets for ing to be submitted to / 5/09.	Complete: Factory arranges internal training for the workers on the disciplinary system (policy and procedure) on a monthly basis.		
Records Maintenance		Employers will maintain written records of disciplinary actions taken.	No written records maintained for the number of disciplined workers or separated or fired workers on a monthly basis or for the steps and procedures of disciplinary actions. Only warning letter is issued and maintained properly with respective files. Warning/termination letter was found but no personnel file/documents for the person in question were available.	Management interview and personnel file check	The factory will attend a training of supervisors/management on treatment of employees and disciplinary actions. We are sending the training outline from Lift-Standards and we Top of the World/Outdoor Cap fully recommend that [factory] contract with Lift-Standards to complete this training program which consist of a 2 days disciplinary and CoC training and the a consultancy 4 months program . We are also sending you a list of disciplinary procedures as a reference of what your system should resemble. Please send Top of the World/Outdoor Cap the factory's revised policies and procedures relating to discipline and a confirmed training date by November 1, 2005.	11/1/200	5 Factory Response: The factory is arranging training programs for supervisors/management on treatment of employees and disciplinary actions. We will send revised policies and procedures and a confirmed training date by 11/1/05.	The factory has chosen not to hire Lift Standards for the training. They have hired a person to help the factory become compliant. The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. Factory has established and posted disciplinary policy and procedures. Training has occurred for management. Training to be	n of training by documentation from	migrant workers on a monthly basis. Warning letter	migrants/terminated/newly		Complete: Records are maintained for disciplined and migrant workers on a monthly basis.		
Verbal abuse		threatening, or demeaning verbal language.	Verbal abuse occurs in cases of failure to achieve the production target, unauthorized absence and mistake in work. Workers are to made to stand in front of the sewing line for half an hour as punishment for absence.	workers and supervisors interview and group discussion.	The factory will attend a training of supervisors/management on treatment of employees and disciplinary actions. We are sending a training outlined from Lift-Standards and we Top of the World/Outdoor Cap fully recommend that [factory] contract with Lift-Standards to complete this training program. Please send Top of the World/Outdoor Cap the factory's revised policies and procedures relating to discipline and a confirmed training date by November 1, 2005.	11/1/200	Factory Response: The factory is arranging training programs for supervisors/management on treatment of employees and disciplinary actions. We will send revised policies and procedures and a confirmed training date by 11/1/05.	The factory has chosen not to hire Lift Standards for the training. They have hired a person to help the factory become compliant. The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. Factory has established and posted disciplinary policy and procedures. Training has occurred for management Thru worker interviews, no evidence of continued	n of training by documentation from	ad The factory has developed a policy and procedure on disciplinary action. However, the factory has not hired any outside consultant to provide training on treatment of employees and disciplinary action as per PC remediation plan. Compliance officer informed that they conducted training for supervisor/management on said issues but monitors could not find a record of this specific issue on the training schedule. Verbal abuse persists. One of the supervisors was observed to be yelling at a worker during the factory tour.	workers and management train interview and factory tour. TOW	ory does periodic ingsign in sheets for ing to be submitted to / 5/09	Complete: Verbal abuse and informal punishment system has stopped. Training for the workers and supervisors has been conducted. But training needs to continue on a regular basis.		
Monetary Fines and Penalties		penalties for poor performance	Worker's attendance was deliberately omitted from the attendance register resulting in salary deduction for wrongdoing/mistake in the work.	worker and supervisor interview and attendance and payment record reviewed	The factory will immediately STOP the practice of omitting workers attendance from the attendance register; this is a form of informal punishment. Please send Top of the World/Outdoor a copy of the attendance record for the embroidery section for the months of September and October 2005 and a letter from top management that this practice has immediately been corrected by November 15, 2005.	11/15/200	5 Factory Response: The factory will immediately STOP the practice of omitting workers attendance from the attendance register. The factory shall send a copy of the attendance register record for the embroidery section as requested for th months of Sept. and Oct. 2005 and a letter from management stating as such by 11/15/2005.	The factory has stopped the practice Copy of attendance of omitting workers attendance from attendance register.		There was no evidence of omissions with the attendance book-keeping and there were no salary deduction for doing a mistake with the job.	Workers and management interview, time records and payroll sheets review.		Complete: No case of salary deduction has been identified. Workers interview & document review.		
Monetary Fines and Penalties			Worker's attendance was deliberately omitted from the attendance register resulting in salary deduction for wrongdoing/mistake in the work. Approved leave is also deducted from the salary if special permission for leave with pay is given by the supervisor in charge.	Attendance record review and management interview and personnel files reviewed, worker interview.	The factory will immediately STOP the practice of omitting workers attendance from the attendance register; this is a form of informal punishment. Please send Top of the World/Outdoor a copy of the attendance record for the embroidery section for the months of September and October 2005 and a letter from top management that this practice has immediately been corrected by November 15, 2005.	11/1/200	practice of omitting workers attendance from the attendance register. The factory shall send a copy of the attendance register record for the embroidery section as requested for the months of Sept. and Oct. 2005 and a letter from management stating as such	e		From record review of last 12 months as well as worker interviews we did not find any evidence or heard any complaints from workers regarding the recording of working hours or salary deductions due to mistakes with the job. Nor did we find any evidence of salary deductions for approved leave.	interview, time records, leave register, workers personnel		Complete: No case of salary deduction has been identified. Workers interview & document review.		
Other (Grievance Procedure)			Worker handbook is not provided to all the worker. Workers are not aware of the grievance and disciplinary system and procedures. Some of the workers only know about the existence of suggestion box but they are not clear and confident about the credibility and effectiveness of it.	Attendance record review and management interview and personnel files reviewed, worker interview and WWC member interview	The factory shall immediately give all workers a worker handbook, also the factory shall post their grievance and disciplinary policies on notice boards through out the factory and we recommend that you have the WWC start collecting the suggestion box comments, review the complaints/suggestions, and give to management. Management should respond back to the WWC within a specified period of time and the WWC can post the resolutions to the problems or comment on a notice board soothe employees can see the effectiveness of this communication system. Send Top of the World/Outdoor Cap photos of the posted grievance and disciplinary policies and a new procedure for the involvement of the WWC in this process by November 1, 2005.	11/15/2005	by 11/15/2005. Factory Response: The factory shall immediately give all workers a worker handbook, also the factory shall post their grievance and disciplinary polices on notice boards through out the factory. The factory w send photos of the posted policies and new procedure for the involvement of t WWC is in the process by 11/1/05.	Outdoor Cap to check for new handbook on Feb 06 visit.	n revised	Workers handbook has been distributed to workers as per remediation plan but it was the old version. The workers are not accustomed to dropping complaints/suggestions in the designated boxes as they think the complaint boxes placed in the toilet do not resolve the workers' problems. Monitors also found that no complaint was recorded in the complaint register for the last few months. Complaint and suggestion boxes were opened by the Welfare Officer on a fortnightly basis, although as per remediation plan they have to be opened by WWC.	group discussion. Interview of new with compliance and welfare officer, review of the complaint register and complaint file.		Complete: Workers are aware of the disciplinary and grievance system. They are aware of the existence of suggestion box but do not use them actively. Factory has a new Workers Participation Committee elected on May 30, 2009 which is still functional. Suggestion boxes only receive minor complaints or problems like toilet repair, non-functional lights or fans, etc. Only 3 such complaints submitted in the last few months.		

			Findings			Remediation	Updates (Cite Date of I	[/ · · · · · · · · · · · · · · · · · · ·			Company Verification Follow up
FLA Code/ Compliance issue Country Law/Le	gal Reference FLA Benchmark Non-compliance	Risk of Non-compliance	Evidence of Non- compliance (uncorroborated)If not corroborated, explain whySources/Documentation used for corroboratingNotable Features implemented by Factory Management or Company	PC Remediation plan	Target Completion Dat	Factory Response (Optional) Company follow up (Cite date of Document	ation Company Follow up	Documentation Third Party Verification (IEV: September 12, 2007)	Documentation Company Follow up	Documentation Third Party Verification (IEV: June 15-16, 2009) Sources/Documentation use for corroborating	d Company Follow up Documentation (August-November 2009)
5. Nondiscrimination											
	in employment, including hiring, salary, benefits, ent, on the basis of gender, race, religion, age, disability, or social or ethnic origin.										
	ing environment to prevent accidents and injury to health ourse of work or as a result of the operation of employer										
facilities Fire Safety Health and Safety legal compliance	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 No first aid policy/team or doctor found, only one nurse (without professional training and certificate) available.		Management interview, records reviewed and workers interview Personnel files reviewed	 The factory shall contact the local fire marshal and have a training conducted with the current fire fighting team. Also, have the local fire fighting team keep meeting notes from this training on file. Training should be done quarterly. The factory will train all employees on who the fire fighting team members are on a quarterly basis. Meeting notes are to be kept. Photos on the fire fighting team need to be posted in the canteen, production area, at all entrances and any place employees gather. The training will be completed by November 1, 2005 and meeting notes sent to Top of the World/Outdoor Cap. Send photos of the fire fighting team photos as they are posted in all areas of the factory by November 1, 2005. Per the Bangladesh Factories Rules, 1979; The ambulance room or dispensary shall be in charge of a qualified medical practitioner assisted by at least one qualified compounder and nurse and such subordinate staff as the Chief Inspector may direct. The medical practitioner shall always be available on call during working hours. The factory shall create a first aid policy 		1. The factory shall contact the local fire marshal and have a training conducted with the current fire fighting team. The factory will keep meeting notes from this training on file. The factory will send photos of the posted fire fighting team photos at the factory by 11/1/2005.remediation items by 11/1/05, asking that it be given to TOW on December visit.established a trained a fire team, Dec. 02. The factory will keep meeting notes from this photos of the posted fire fighting team photos at the factory by 11/1/2005.The factory sent a copy of their first aid policy on 10/31/05. We are requesting a procedure from the factory stating who is responsible for maintaining the first aid boxes byEstablished a trained a fire team, Dec. 02. The factory has already created a firstDecember visit.2.	time doctor that started on 4/16/06 that will be in the and factory 2 days a week and on call. Advised factory by law that a doctor should be on the premises at all times but this is a step in the right direction. Also sent was nurse's certificate. bspital Mrs. *** ***	The factory has posted the names of fire fighting team members on the notice board of the production floor, but some of these team members had already left the factory. Firefighting team is not known to the workers. Photos of the firefighting team were not posted in the canteen and production area. The factory has a first aid policy and it was posted. There is no full-time qualified medical staff. The factory doctor comes in twice a week (Wednesday & Saturday) for 2-3 hours.	Compliance Officer, interview with firefighting team and workers. Inspection of the fire fighting equipment and the notice board on the	Completed: Fire fighters have been traine, list with pictures is posted on each floor. 2 doctors (one male and one female) come in two times, for half the day. A full time nurse is also available in the factory.	
Fire Safety Health and Safety legal compliance										New finding: Fire extinguisher Visual observation found empty and not available in a number of places.	COMPLETE Aug '09 - Oct '09 Policies on adequate safety equipment have been updated and training with all staff has been implemented to ensure that there is no empty or missing equipment at the
Evacuation Procedure	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		Management interview and visual inspection. Records and register reviewed	In accordance with Section 22 of the Factories Act, 1965, and Instruction Number F.S.O. CD/4409/4(120) dated 9/11/97 of the Fire Service, each factory shall conduct at least 1 fire escape drill every month, and maintain proper details of the drill. The factory shall start immediately adhering to local law by conducting a monthly fire drill. These fire drills should be kept in a log. Please send Top of the World/Outdoor Cap a copy of the fire drill log and photos of the drill for the month of September and October 2005 by November 1, 2005.	11/1/200	5 Factory Response: Fire safety policy already been made and posted in the notice board. Fire drills are now kept in a log. Will send copy of log and photos of monthly drill for the month of Sept and Oct. 2005 by 11/1/2005. Factory has now posted the fire safety policy in the local language. Factory conducts monthly fire drill - confirmed by TOW through worker interviews, Dec. 05.	ews,			Completed: Fire drill is conducted every month and documented in register.	facility.
H&S 9. Evacuation requirements and procedure										New finding: Aisles and fire extinguishers are found partly blocked in the main stairs, in front of the store. Main factory entrance was partly blocked with fabric roll and cartons. Visual observation.	COMPLETE 06/18/09 The entrance and aisles were cleared of all items blocking access to/from for all workers.Photos are sent to FLA for review.Aug '09 - Oct '09 Policies on adequate safety equipment have been updated and training with all staff has been implemented to ensure that there is never empty or missing equipment at the facility.Photos are sent to FLA for review.
Safety Equipment	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			According to the Factories Act 1965, Section 44, and Factories Rules 1979, Section 55 every factory shall provide and maintain at least 1 first aid box with its prescribed contents for every 150 workers, in the charge of a person trained in the use of first aid. The factory shall comply with local law and properly stock all first aid kits at the factory as stated above and create a policy and procedure for the kits to be checked weekly for re-stocking. Please send Top of the World/Outdoor Cap photos of the completely stocked first aid kits and a copy of the new policy and procedures for re-stocking of the first aid kits by November 1,		Factory Response: The factory has already created a policy and procedure for the kits to be checked weekly for re-stocking. The factory will send photos of the completely stocked kits and a copy of the new policy and procedures for re-stocking by 11/1/05. The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. TOW found that first aid kits still not well stocked in Dec. 05, TOW will send a fully stocked first aid kit as an example by 2-15-06. Outdoor Cap to check on February 19 factory follow-up visit.	ODC to check all first aid kits at factory during Feb. visit. ODC found first aid kits to be stocked well. Also was told that the factory will model their first aid kits as the one TOW sends.	The monitors randomly checked 4 first-aid boxes during walk-through and found two boxes empty. There were only Nuspa tab – 2 nos., Abomine tab – 2 nos. and a piece of dirty cotton in the two first-aid boxes of the 3rd floor. Supervisor informed that a requisition was prepared by nurse to buy the medicine. Nurse showed the requisition paper to the monitors during the medical center visit. First-aids kits were not well-stocked. Monitors also did not find any evidence of weekly checking for re-stocking.	compliance officer and locked to prevent theft. Al general workers, inspection	Incomplete: First aid boxes were found mostly empty / not sufficiently stocked in many placesr. Even the doctors' room/emergency room is not well stocked with medicine.	COMPLETE Aug '09 All first-aid equipment has been re-stocked; more training implemented on the upkeep of these items. Concern was brought up of these items being stolen frequently by workers so new practices of securing these items/areas were implemented along with the training on the upkeep and inspection of inventory.
PPE	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 shall immediately supply all PPE to necessary employees and train the employees on the use of the protective equipment. Please send photos of employees wearing required PPE by November 1, 2005.	11/1/200	5Factory Response: The factory shall supply all PPE to necessary employees as soon as possible and train the employees on the use of the protective equipment. The factory will send photos as soon as possibleThe factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. TOW found again that PPE was not provided to workers Dec. 05. Outdoor Cap to check again on Feb. 19th visit.	ODC to check for PPE used by workers on factory tour. ODC toured the factory and saw workers using PPE. Several photos were taken and on file.	Factory management supplied sufficient PPE (hand gloves in iron section, mask for the over-lock machine and mask and hand gloves to protect thinner hazard). But hand gloves were not used in the ironing section. Monitors found that enough hand gloves were stocked in a room very close to the ironing section. Masks were not used for the over-lock machine. Thinner was not used during the audit process.	personnel in-charge, confirm use of PPE 5/09 Workers and management	Incomplete: PPE was not sufficiently provided for the printing section, Embroidery (subcontract factory) section and Iron section.	COMPLETE Aug '09 - Nov '09 The importance of all PPE devices and the implementation of a plan to ensure that all are used by workers was devised. Inventory on what was needed was done in early November, and by 11/30/09 all PPE missing was passed out to anyone who needed more protection.
Chemical Management	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 shall immediately label all chemical in the local language and English and post Material Safety Data Sheets (MSDS) for all chemicals. Send Top of the World/Outdoor Cap photos of the labeled chemical containers and copies of the MSDS sheets by October 1, 2005.	11/1/200	Factory Response: The factory has already labeled all chemicals in the local language and English. They have posted MSDS sheets for all chemicals. The factory will send photos of the labeled containers and copies of the MSDS sheets within short time. The factory did not send remediation Tour of factor given to TOW on December visit. Follow-up audit in Dec. 05 showed thinner marked and MSDS checks being followed.	y.		Floor visit, review of the MSDS of thinner, worker and management interview.	Incomplete: Thinner was used inside the floor which needs a separate room with exhaust fan sucking out the air outside. The thinner spray gun was not labeled.	COMPLETE Aug '09 We implemented a plan and arranged for immediate construction of the ventilation needed in this storage area. Sep '09 - Oct '09 Inventory was done on all chemicals being used and new labels were placed where necessary. Training was implemented on the procedure for inspecting and correcting any chemical labeling or storage matters.
Chemical Management										New Finding: Chemical in the printing section was not labeled. Visual observation.	COMPLETE Aug '09 We implemented a plan and arranged for immediate construction of the ventilation needed in this storage area. Sep '09 - Oct '09 Inventory was done on all chemicals being used and new labels were placed where necessary. Training was implemented on the procedure for inspecting and correcting any chemical labeling or storage matters.

ELA Code/ Compliance issue Country Law/Legal Reference	ICE FLA Benchmark	Non-compliance	IEM Findings Risk of Non-compliance compliance (uncorroborated)	d, Sources/Documentation Notable Feature used for corroborating Factory Management o Company		Remediation Target Factory Response (Optional) Completion Date Image: Completion Date	Company follow up (Cite date of follow up)	Updates (Cite Date of Follow up nentation Company Follow up Docun	Ip) Third Party Verification Imentation Third Party Verification Documentation (IEV: September 12, 2007) IEV Documentation	Company Verifica Company Follow up		ed Company Verifica ed Company Follow up (August-November 2009)	tion Follow up Documentation
ninery Maintenance	All production machinery and equipment shall be maintained, properly guarded, an operated in a safe manner	Eye guard with the overlock and bartek machine is not used and in some cases the guard were not found installed on the machines.		Visual inspection	The factory shall immediately supply all PPE to necessary employees and train the employees on the use of the protective equipment. Please send photos of employees wearing required PPE by November 1, 2005.	11/1/2005 Factory Response: The factory shall supply all PPE to necessary employees as soon as possible and train the employees on t use of the protective equipment. The factory will send photos as soon as possible	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. TOW found again that PPE was not provided to workers Dec. 05. Outdoor Cap to check again on Feb. 19th visit.	ODC to check for PPE used by workers on factory tour. ODC toured the factory and saw workers using PPE. Several photos were taken and on file.	The eye guard was not fixed for the over-lock and bartek machine. When the monitor asked about the eye guard the worker showed it under the table. Workers and supervisors did not receive any training on the importance of machine guard and the necessity of its use. New findings : No needle guard on the sewing machine.	Proper guards are installed on all machines. To be reconfirmed by on location auditor 5/09.	Completed: machine guards and visual observation.		
hinery Maintenance	All production machinery and equipment shall be maintained, properly guarded, an operated in a safe manner										New finding: Automatic switch (by hand) for cutting machinees is not functional. They are modified by factory and run by legs. Visual observation and interview with machine operators.	COMPLETE Aug '09 In discussing this with the factory staff, we were told that the workers often remove the switches to allow for faster operation of the machines. We advised that this is an unacceptable practice and implemented a plan to correct all machines that needed to be fixed. Inspections were done and all of the machines were fixed in November '09.	
tation in Facilities		Number of male toilets is sufficient and in keeping with the local law. But the number of female toilets need to be 36 for 900 female workers whereas factory has 5 female toilets per floor with a total of 15 toilets. The canteen are not spacious enough to accommodate all the workers, as a result some workers take their lunch sitting on the floor. Sometimes water supply and washing facility are not available/adequate during lunch hour.		Visual inspection and records review, group discussion with workers	 1. We suggest that the factory re-allocated the number of restrooms between male and female, you have too many for the men and not enough for the females. The total number of female toilets required by law should be increased from 15 to 36 by November 1, 2005. If after re-allocation of the bathrooms, you still do not have enough for the women, then you will have to insta new facilities for the women to bring your total to 36. Please send Top of the World/Outdoor Cap your plans to comply with local law by increasing the number of female totals to 36 by November 1, 2005. 2. We recommend that the factory stagger the lunch times to accommodate all workers comfortable during lunch breaks if possible, otherwise you will need to enlarge the canteen to 	11/1/2005 Factory Response: 1. We will take action for this and will send you our plans to comply with loc law by 11/1/2005. II 2. We have taken necessary action for this. We will send all information by 11/1/2005 as requested.		The factory has realigned the # of bathrooms for women and men to ensure enough for women giving the women 41 and the men 15.	The factory allocated 41 toilets for female workers and 15 for male workers. Water supply was available during the factory tour but washing facility was overcrowded. The dinning rooms (canteen) of 2nd, 3rd , 4th and 5th floor are spacious enough for the workers. The dinning room of the 1st floor was used by both the ground floor and 1st floor workers. At present factory management provides lunch in 2 seating for the workers of these two floors and therefore the space was sufficient. New Findings: The toilets were clean but sandal and soap were not available. Workers went to the toilet bare foot.	Per [internal monitor] factory provides soap an eview sandals but both are often missing due to theft.	d d h Completed: Sufficient toilets provided and canteen space was also sufficient observed during lunch hour. Sandal is provided for toilet use. Visual observation and workers interview.		
rker Participation	Workers should be involved in planning fo safety, including through worker safety committees	or No worker safety committee found.		Workers and management interview	accommodate all the workers. and to supply water and washing The factory shall create and appoint some employees to a worker safety committee by November 1, 2005. This committee shall meet at least quarterly and meeting notes must be kept. Please send Top of the World/Outdoor Cap a list of all members of the committee and a plan of upcoming meetings for this committee by November 1, 2005.	The factory shall create a worker safe committee by 11/1/05. This committee shall meet at least quarterly and meet	end workers safety committee. and		The factory formed a fire safety committee and it has posted the name of fire safety team on the notice board on the production floor but some team- members had already left the factory as management acknowledged. Workers were not familiar with the fire fighting teams. Photos of the fire safety team were not posted in the canteen and production area.		Completed: Fire fighting team has been trained along with first aid team. The photos are posted on each floor. Workers are also familiar with team members.	al	
tation in Facilities	All facilities including factory buildings, toilets, canteens, kitchens, and clinics, sh be kept clean and safe and be in compliar with applicable laws										New findings: Generator and compressor room are not well maintained. Electric wires were crossing walkways and lying on the floor and overall maintenance is poor. Visual observation	COMPLETE F Aug '09 Maintenance was done in the Generator Room to ensure that is was safe and working properly. Training was implemented on the importance of upkeep here due to the extreme danger of this area if not kept safe.	hotos are sent to FLA for review
er (Childcare facility)		Child care facility is not functional, workers are not aware of the facility. Childcare room is not in a separate building but in the main building where production is taking place.		Visual inspection and worker interview	The factory must ensure that the childcare facility is clearly away from any production area. The childcare facility must be kept clear of all obstacles that are not related to childcare. The factory must now promote the use of the child care facility to the employees. We recommend the factory contract with Lift- Standards to complete a consultancy training to help bring many different areas of the factory into compliance, by doing this the female workers will be asked what would make the child care acceptable for them and then this information would be brought to management for further discussion. Send Top of the World/Outdoor Cap the training date that is confirmed with Lift- Standards for the consultancy training by November 1, 2005, see attached information regarding this program.	Now it is impossible to us for shifting the childcare center from the production floor. But in the future, we shall try to shift child care from the production floor floor. But in the factory promotes the use of the child care facility to the employees. We are taking the necessary action to make the day care center functional. We shall send information about the daycare center by 11/1/2005.	The factory is no longer using the facility for uniform storage. Employees are aware other facility ve exists and is functional, however it is not being used. Outdoor Cap will	ODC to discuss child care issue with factory management at Feb. 06 visit ODC toured child care facility which is located in the production facility, no children are enrolled in child care facility at this time.	The child care centre is still not functional and it has yet to be moved to a different location.	t Child care center has ion. been cleared but still not in use. Target completion by 11/09.	Incomplete: Childcare facility is not functional and still in the main factory building on 4th floor. The childcare center was found empty without any one responsible (caretaker) for the room. Moreover, one child was found inside the factory building ground floor who was a nephew/ orphan of a worker, who works on the 5th floor of the building which is a sister concern of the factory (same owner). With the intervention of the auditor the child was placed in the child care room for the time being.	COMPLETE Immediate discussion of the child-care facility with factory management implemented as soon as the audit findings were given to TOW. A new room was created and equipped for the facility and child-care was resumed formally in November 2009. Certified staff were hired to work in this facility and it is operating now. Photos are uploaded onto the FFC site for review.	hotos are sent to FLA for review
er (Qualification of the lical Practitioner)		Technical staff (nurse and electrician. in- charge of health and safety matters) do not have any academic and professional certificate and degree. They have only experience of working in their respective field but even those certificates are not maintained in the personnel files.		Personnel File review	The factory shall create a first aid policy immediately. The factory shall hire a qualified medical practitioner and at least one qualified compounder and nurse as required by local law by October 1, 2005. Send Top of the World/Outdoor Cap a copy of the first aid policy and copies of the medical staff's certificates and photos by November 1, 2005 as evidence.	d 11/15/2005 aid policy. The factory will hire a qualified medical practitioner and at le one qualified compounder and nurse soon as possible. The factory will ser		ODC to discuss with factory management about hiring a medical practitioner, factory has hired a medical practitioner part-time.	The personnel file maintained by the nurse contains job application, appointment letter, employment contract, nationality and character certificate. The nurse has completed only three and half months course on "Theoretical and practical nurse training course" from Khulna Surgical & Medical Hospital (Pvt.) Ltd and the certificate was available in the personnel file. The factory management could not provide us personnel file for other technical persons.	v of confirm personnel files fo	or Completed: Factory maintains complete personnel files for nurse and technical person electrician. Both the files were available and found complete with their certificate.		
S.8: Permits and ificates							contract of the appointment by				New findings: Environmental certificate was not available for printing section. No ETP was found for the water from the printing section seen to be going through the regular drainage system. Documents review and management interview.	NOT COMPLETE Aug '09 A plan to correct the drainage system and obtain the approval via certificate of the local authorities was discussed with the factory management. Oct '09 Pending verification of the corrections necessary to resolve this matter. Nov '09 - Dec '09 Analysis of the status of the drainage system is being done to determine a final course of action.	
											New finding: Workers found working barefoot. The workers standing in the iron and finishing section were not given floor mat to stand on. Visual observation.	COMPLETE Aug '09 - Oct '09 Training for workers on use of PPE and other materials such as shoes in a factory environment was implemented. Follow-up monitoring will be done to ensure worker compliance is ongoing.	
reedom of Association and Collective Bargaining ployers will recognize and respect the right of employee gaining er	es to freedom of association and collective	be Bu wa	Worker Welfare Committee has een selected during Jan 2005. ut the committee is ineffective and orkers are not familiar with the embers and their activities.	Attendance record review and management interview and personnel files reviewed, worker interview and WWC members interview	The factory shall request the WWC to have monthly meetings starting immediately, document the meetings and help to promote this committee with the workers. Post photos of the WWC members in all areas of the factory where employee may gather, so the general employees can identify who their WWC committee members are. Send Top of the World/Outdoor Cap meeting notes in the local language and translated into English for the October 2005 meeting and photos of the WWC members posted at the factories by November 15, 2005.	the workers. The factory shall send meeting notes for Oct. and photos of WWC members posted at the factory 11/15/2005.	th maternity benefits and financial assistance for housing for workers	ODC reviewing and working with factory on revised handbook and training of workers.	The Worker Welfare Committee (WWC) consisted of 17 members. Compliance officer is the Chairman of this committee. The factory posted the photo of WWC members on the notice board in the production floor. But most of the members had left the factory. Workers are not aware of the role and responsibilities of WWC. Factory did not arrange WWC meetings on a monthly basis and keep the WWC's meeting minutes as per the remediation plan of PC. Workers are still not familiar with this committee, but were aware that Compliance Officer and Welfare Officer were members of WWC.	confirm WWC meeting	Image: Complete: New Workers Document review and worker Participation Committee of 16 Interview and WPC member Image: members (worker:13 and management:3) has been elected on May 30, 2009. But the new committee needs to made functional with sufficient training on roles and responsibilities. Document review and worker		

		Factory Management o Company	or land the second s			(IEV: September 12, 2007)	
neeting employees' basic needs. Employers will pay required by local law or the prevailing industry wage,							Image: Constraint of the second se
ated benefits 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 Workers are not aware of the salary calculation, incentive system, entitlements and benefits.		worker and management interview and group discussion with workers	The factory shall immediately start communicating with the employees in writing and hold an employee meeting to explain the employee's wages, incentives systems, benefits and bonuses that each employee is entitled to by law. Send Top of the World/Outdoor Cap a copy of the meeting notes and photos from the employee meetings by November 1, 2005.	explain the employee's wages, incentives systems, benefits and bonuses that each employee is entitled to by law. The factory will send a copy of the meeting	given to TOW on December visit. The factory provided TOW with employee meeting notes on training of wages and benefits. Also signed attendance sheet from the meeting, Dec. 05.	Workers are still not aware of the salary scale and benefits they are entitled to by law. Workers informed that factory did not arrange any training for workers on wages, incentive system, benefits and bonus. Management produced a training schedule where there was mention of factory Code of Conduct. No specific training schedule was found focusing on above mentioned issues.Worker and management interview, review of payroll sheets and training schedule workers and training schedule where there was mention of factory Code of Conduct. No specific training schedule was found focusing on above mentioned issues.Worker and management mentioned issues.Factory conducts periodic training schedule worker and training schedule worker and training schedule where there was mentioned issues.Worker and management interview, review of payroll sheets and training schedule workers and training schedule where there was mentioned issues.Factory conducts periodic training-sign in sheets from training to be provided to TOW 5/09	Complete: Workers are aware of the wages and benefits, overtime calculation, bonus system. Workers training is conducted on the above issues. Workers training is conducted Image: Complete issues issu
Accurate and reliable payroll reporting, including pay stubs will be provided Payroll is not in the local language, double record keeping and payment is practiced, no payment date is mentioned on the payroll.		Sample payroll check and documentation check, management interview	The factory will change the payroll system to be in the local language starting October, 2005. Please send a copy of the payroll records for October by November 15th to Top of the World/Outdoor Cap. Double record keeping is not an acceptable practice. This must be stopped immediately. Please have upper management draft a letter to Top of the World and Outdoor Cap stating they will no longer keep double books to hire overtime hours in the future.	1/15/2005 Factory Response: The factory is trying to change the payroll system in the local language. Double record keeping is fully stopped now.	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. Letter is kept in factory file. The factory submitted a letter from upper management stating that the practice of double books to hide overtime has stopped and will not continue to occur, Dec. 05. Letter is kept in factory file.	Payroll sheets still not in local language. We have checked the time records, payroll sheets and interview with some workers. We did not find any evidence of double record keeping or discrepancies between records and actual payments made. Payroll sheets indicate the date of the payment.	Incomplete: Payroll is not in local language. Factory maintains two sets of records to handle different buyers. In the first set of records they show only legal working hours with 2 hours overtime /day. But on the second set of records they records all working hour including excessive overtime and Friday work. They pay the workers on actual working hour on second set of records and the payment is convertine
Employers will provide workers a pay statement each pay period, which will show earned wages, regular and overtime pay, bonuses and all deductions		Payroll checked and management interview	The factory will change the payroll system to be in the local 11 language starting October, 2005. Please send a copy of the payroll records for October by November 15th to Top of the World/Outdoor Cap. Double record keeping is not an acceptable practice. This must be stopped immediately. Please have upper management draft a letter to Top of the World and Outdoor Cap stating they will no longer keep double books to hire overtime hours in the future.	1/15/2005 Factory Response: The factory is trying to change the payroll system in the local language. Double record keeping is fully stopped now.	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. The factory submitted a letter from upper management stating that the practice of double books to hide overtime has stopped and will not continue to occur, Dec. 05.	On the payroll sheet there is an item in the last column of the sheet, "Deducted Amount" but no specification regarding the deduction. Review of payroll sheets & time records, management interview. On location auditor to confirm payroll sheet contains detailed deductioncopies to be sent to TOW 5/09	Incomplete: Payroll is not yet in local language. Factory informed that stratting next month they are going to change the payroll into local language with necessary updates.
Time worked by all employees, regardless of compensation system, will be documented by time cards or other accurate and reliable recording systems such as electronic swipe cards (Factory has initiated the thumb reader electronic system but it is not functional and will take two months to become operative.)		visual inspection and worker and management and worker interview	The factory has initiated a thumb reader time keeping system, but11it is not currently operating. Until this system is operating correctly, the factory will need to have alternative reliable system in place, such as time cards that the employees punch, not the supervisors. Please confirm you will have the employees start using time cards to clock in and out until the thumb reader system is operational. Please send Top of the World/Outdoor Cap copies of time cards for 10 employees for the month of October 2005, by	clock in and out until the thumb reader system is operational. The factory will	given to TOW on December visit. The factory has completely installed	Time recording is still done manually and recorded on the time card only. Supervisor has full control over it. Workers only put their signature on the time cards and have no personal control over the recording of their in and out time.Review of payroll sheet & time records, management interview.On location auditor confirms thumb print time recorder in addition to manual time cards, however time is still calculated from manual time cards.	Incomplete: Still recorded manually by the supervisor and time keeper. Factory has initiated barcode system but still not functional and expects to make functional from July'09. Documents review and Management interview. Aug '09 - Oct '09 A plan was implemented to begin using a new payroll system this fall. This new software system will assist with the monitoring of all records and ensure that this is provided accurately in the local language of the workers and management staff.
Employers will provide all legally mandated benefits to all eligible workers Leave benefit is not practiced properly. Earned leave is not given to workers; festival leave is paid only with the two eid holidays (5+5) days; casual leave is sometimes not paid depending on the superiors; maternity leave is allowed but not paid (with workers encouraged to avail of two months instead of 12 weeks).		Worker interview and records review and management interview	November 15th. Based on local laws concerning leave, the factory shall immediately start following local law and giving the employees the legally required leaves as stated for annual leave, festival leave, casual and sick leave and maternity leave. Management shall revise the employee handbook to state the above policies and send Top of the World/Outdoor Cap a copy of the revised handbook in the local language and in English by November 1, 2005.	sick leave and maternity leave. They shall immediately start following local law and giving the employees the legally required leaves as stated above for annual leave, festival leave and casual leave. The factory will send a copy of th	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. The factory has established a log for leave and maternity leave. Factory has provided copies of paperwork, Dec. 05. Still need a copy of e revised worker handbook, Outdoor	Leave benefit is still not practiced properly. Earned leave is not given to workers, but factory management informed that the earned leave of 2006 will be given at the end of 2007. Festival leave is given in the form of two Eid holiday days. Casual leave, sick leave and maternity leave is given in compliance with the local law.	Complete: Factory has a list of Documents review and Festival holidays on different management interview and festive days which is also posted workers interview. and maintained accordingly. Berefit is given to the workers along with casual, sick and maternity leave.
Workers will be paid for holidays and leave as required by law Friday (weekly day off) work is paid as overtime but not compensated with a compensatory day off within three days as per the law.		Worker and management interview and records review.	The factory shall immediately start giving all employees who work on a weekly holiday a substitute day off within the legally subscribed 3 days of the weekly holiday. Send Top of the World/Outdoor Cap 10 employee time cards, attendance records and salary sheets for the month of October 2005 by November 15th as evidence this has been corrected.	employees who work on a weekly holiday a substitute day off within the legally subscribed 3 days of the weekly holiday. The factory will send 10 time cards, attendance records and salary sheets fo	 given to TOW on December visit. The factory sent time cards, attendance records and salary sheets showing that they are providing employees with 	Work on weekly off day is compensated as overtime but no compensatory day off is given within three days as per law. Workers interview; review of time records, leave register, workers' personnel files and payroll sheets. On location auditor to confirm compensated day off is given 5/09	Incomplete: Work on weekly off days (2 to 3 Fridays/ per month) is conducted and although it is paid as overtime, it results in continuous work up to 20 day without a break. Document review and workers interview. Document review and workers interview. NCOMPLETE 09/24/09 More effective production schedule planning was discussed with factory management. TOW was reassured that full attention would be paid to limiting staff hours to within the 60 hours/week limit and Friday as an off-day will be maintained going forward. 11/01/09 - 12/31/09 Follow-up discussion ongoing regarding PO's placed at ***factory*** for TOW headwear orders. Evaluation of work schedule is ongoing and total hours worked per week is decreasing steadily.
Employers will not use hidden or multiple payroll records in order to hide overtime, to falsely demonstrate hourly wages, or for any other fraudulent reason.		Management interview and records reviewed	Double record keeping is not an acceptable practice. This must be stopped immediately. Please have upper management draft a letter to Top of the World and Outdoor Cap stating they will no longer keep double books to hire overtime hours in the future.	11/1/2005 Factory Response: Double record keeping has already beer stopped.	The factory did not send remediation items by 11/1/05, asking that it be given to TOW on December visit. The factory submitted a letter from upper management stating that the practice of double books to hide overtime has stopped and will not continue to occur, Dec. 05.	The factory did not maintain any hidden or multiple payroll records in order to hide overtime or to falsify hourly wages. Review of payroll sheet & time records, interview with management.	Incomplete: Factory maintains two sets of records to handle different buyers. In the first set of records they show only legal working hours with 2 hours overtime /day. But on the second set of records they record all working hour including excessive overtime and Friday work. They pay the workers on actual working hour on second set of records and the payment is accurate.Documents review and management interview.COMPLETE Aug '09 We addressed this with the factory management letting them know that this practice is not acceptable to us and that it won't be tolerated going forward. We have been reassured that with the focus the management team is placing on overseeing the production schedule more accurately along with the new payroll system tracking hours worked more effectively, they will be able to control all aspects of the records management system.
All employees will be credited with all time worked for an employer for purposes of calculating length of service to determine the benefits to which workers are entitled Some of the daily workers have been working in the factory for a long time (up to 4 years continuously) but have not been absorbed as regularized workers.		Attendance record review and management interview and personnel files reviewed, workers interview	The factory shall immediately recognize the time each employee has worked with the company and pay them according to local law. Please send Top of the World/Outdoor Cap a complete record of all employees showing the date of hire and the current pay scale and the gradation pay scale required by local law by November 15, 2005.	Most of them work 3 days / 4 days in a	new employee's attendance, time	Approximately 11-20 daily laborers are working in different floors 3 to 4 days a week. The workers are working for long hours but not continuously. The payment is made on a weekly basis but the records are maintained on a daily basis through daily payment sheet.	Incomplete: Out of 20 daily workers 3 to 4 found working continuously / everyday for the factory. But they were not being regularized. Document review and workers interview. Document review and workers being given permanent worker status if they were due this assignment. Oct '09 Factory management did verify that they changed the worker status on all eligible workers (3) who qualified for this
	attendance records are not maintained immediately upon their joining. Workers, who have started working on the 17th of the month, were found not to have had their name and attendance recorded in the attendance register by the end of the month. Only if the workers continue to come and become regular, then their attendance is recorded by the line chief to	Supervisors and workers interview. Interview new workers and attendance records reviewed and full process reviewed	The factory shall immediately have all new employees listed on all attendance records starting from the date of hire. Send Top of the World/Outdoor Cap 5 complete sets of new employee's records, showing their applications, contracts, and for the month of October 2005, their attendance records, time cards and salary sheets by November 15, 2005.	employees attendance records from the date of hire. The factory will send 5 complete sets of new employee records, showing their applications, contracts, an	given to TOW on December visit. The factory submitted records showing the immediate recording of new employee's attendance, time	During the floor visit we found a time-card of a worker who had joined on September 1, 2007 but no record/entry of any working time on the time card. Review of payroll sheet & time records, floor visit, interview with newly recruited workers. On location auditor to confirm all workers are receiving credit for time worked. 5/09	Completed: All the workers (including new workers) time records is maintained properly in the time cards and OT register. Document review and workers interview. Document review and workers interview.
		Worker, Management interviews and review of personnel files and attendance records	Based on local laws concerning leave, the factory shall immediately start following local law and giving the employees the legally required leaves as stated for annual leave, festival leave, casual and sick leave and maternity leave. Management shall revise the employee handbook to state the above policies and send Top of the World/Outdoor Cap a copy of the revised handbook in the local language and in English by November 1, 2005	2005 sick leave and maternity leave. They shall immediately start following local law and giving the employees the legally required leaves as stated above for annual leave, festival leave and casual leave. The factory will send a copy of th	leave and maternity leave. Factory factory files.	From review of records for the last 12 months as well as worker interviews we found no evidence or heard no complaints from workers regarding wages deductions for approved leave.	Completed: No deduction is made from the wages in the form of informal punishment. Document review and workers
							New findings: Payment date is not maintained within 7 working days of the next month. Factory could not maintain the payment date for last 6 months. The payment of May 2009 was not paid till June 16, 2009, the 2nd day of the audit.Document review and workers and management interview.COMPLETE Aug '09 We discussed the matter of timely payments to all workers with factory management and were reassured that this will not be an issue going forward. Further monitoring of the payroll records will assist us in ensuring that this is the case going forward. The new payroll system being implemented will assist the management team in processing payroll to the workers more accurately.
employees will (i) not be required to work more than the time or (b) the limits on regular and overtime hours or, where the laws of such country will not limit the hours is 12 hours overtime; and (ii) be entitled to at least one							
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		Worker interview and documents review with management	According to the Factories Act, 1965, Sections 51 & 53, where overtime is paid, no adult worker is allowed to work more than 60 hours per week or 56 per week on an average in a year. According to local law, a worker is expected to work up to 60 hours a week (8 hours normal shift + 2 hours overtime/day x 6 days/week = 60 hours). The factory must comply with local law and our code of conduct concerning hours of work. Send Top of the World/Outdoor Cap 10 employee's time cards, attendance records, salary sheets for the month of October 2005 by November 15, 2005.	law. The factory will send 10 employee time cards, attendance records, salary sheets for October by 11/15/05.	given to TOW on December visit. The factory submitted time cards, attendance records, salary sheets in	Factory did not comply with the limits for overtime hours for daily, weekly and monthly work as per the local law and PC remediation plan. In some cases daily overtime was as long as 10 hours a day and a maximum of 89 hours were recorded in April 2007, 119 hours in May 2007, 122 hours in June 2007and 112 hours in July 2007. Workers worked continuously from 5-20, May 07.Workers interview, review time records; leave register, workers personnel file and payroll sheets.Overtime is an on-going challengeworking with the factory by altering order schedules to alleviate necessity of overtime. On location auditor to review overtime work 5/09	Incomplete: Weekly overtime limit of 60 hours /week is not maintained. Weekly working hour goes up to average 66 hours to maximum 90 hours (including weekly off day work) in April 2009, May2009. But in Janurary 2009 working hour was within legal limit of 60 hours / week.Document review & workers interview.INCOMPLETE 09/24/09 More effective production schedule planning was discussed with factory management. TOW was reassured that full attention would be paid to limiting staff hours to within the 60 hours/week limit and Friday as an off-day will be maintained going forward. 11/01/09 - 12/31/09 Follow-up discussion ongoing regarding PO's placed at ***factory*** for TOW headwear orders. Evaluation of work schedule is ongoing and total hours worked per week is decreasing steadily.
reasonable efforts The employer will demonstrate a commitment to reduce mandated overtime and to enact a voluntary overtime system to meet unforeseen situations No documents found to verify that OT is voluntary.		management interview and records review	All overtime should be voluntary and a sign up sheet should be posted for all overtime work. The factory will update its worker handbook to reflect this policy and start it by October 1, 2005. Send Top of the World/Outdoor Cap a copy of the revised handbook and a sign up sheet from October by November 15, 2005.	sheet to prove all overtime is voluntary. Besides this, the factory informs workers every day for their OT hours before starting their OT. The factory will send a copy of the revised handbook and a sign	given to TOW on December visit. The factory provided copies of voluntary OT sign up sheets. TOW found no evidence of forced OT through interviews during the follow-	Factory maintained a sheet with workers' signatures to document workers' consent for voluntary overtime, but not on a regular basis. Management did not post any advance notice to ensure voluntary work. The factory distributed old handbooks, which were printed prior to August 2005 and therefore do not address this issue.	Completed: workers signature in the time cards and OT sheet is maintained. Factory has developed production output tracking system or database to monitor the regular output and reduce the overtime.Document review & workers interview and Management interview.
If the employer repeatedly requires overtime in order to respond to the same situation, the employer will explain why it will not have sufficient staff on hand to avoid the necessity of overtime.		management interview and records review	Employers shall be able to provide explanation for all periods 11 when the extraordinary business circumstances exception has been used. Employers shall take reasonable steps to inform workers about the nature and expected duration of the circumstances. The factory shall immediately start documenting all overtime hours worked and why. This register shall be kept at all times and be available to any inspector as required. Please send Top of the World/Outdoor Cap a copy of this register for the month of October 2005 by November 15, 2005.	1/15/2005 Factory Response: The factory shall immediately start documenting all overtime hours worked and why. The factory will send a copy of	Feb. 06 visit. Factory provided voluntary OT The factory did not send remediation Factory provided voluntary OT items by 11/1/05, asking that it be sign up sheets for ODC to given to TOW on December visit. review. f Outdoor Cap to check on February	Factory does not maintain any documents regarding explanation for continued required Overtime. Management interview and record review. On location auditor to verify factory maintaining documents regarding explanation for continued required OVERTIME.	Incomplete: No reason / Document review. COMPLETE explanation recorded for the Document review. COMPLETE Aug '09 - Oct '09 Discussion with factory management regarding this issue has maintained. unveiled an obvious communication gap between the management team and the factory staff. We are hopeful that the WPC will assist communication on all levels.
Employers shall be able to provide explanation for all periods when the extraordinary business circumstances exception has been used. Employers shall take reasonable steps to inform workers about the nature and expected duration of the circumstances		management interview and records review	Employers shall be able to provide explanation for all periods 11 when the extraordinary business circumstances exception has been used. Employers shall take reasonable steps to inform workers about the nature and expected duration of the circumstances. The factory shall immediately start documenting all overtime hours worked and why. This register shall be kept at all times and be available to any inspector as required. Please send Top of the World/Outdoor Cap a copy of this register for the	documenting all overtime hours worked and why. The factory will send a copy o	given to TOW on December visit. f Outdoor Cap to check on February	Workers did not know the reason for overtime work. Still no record is maintained for explanation of reasons for overtime but the management maintained a sheet with the workers' signature as a proof of worker consent to do overtime work.Worker and management interview and records review.On location auditor to verify factory maintaining documents regarding explanation for continued required OT 5/09	Incomplete: overtime or excessive overtime is a regular practice for the factory. Workers are not communicated the reason for overtime. Only worker's signature is maintained as proof of consent for doing overtime.
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		Records reviewed and worker interview	month of October 2005 by November 15, 2005. The factory shall immediately comply with local law and not allow women to work past 8pm and not before 7 am. Send Top of the World/Outdoor Cap 10 women employee salary records, including timecards, attendance records, and salary sheets for the month of October 2005, by November 15, 2005 as evidence this has been corrected. 11	to work past 8pm. The factory will send 10 women's employee salary records,	given to TOW on December visit. TOW found not evidence of women	Women workers still worked more than the legal limit Workers and management On location auditor to i.e. later than 8pm and sometimes from 8am till 7am interview and visit floor. On location auditor to next day. Sometimes from 8am till 7am interview and visit floor. On location auditor to	Incomplete: Women work after Document review and workers COMPLETE 10 pm, but not separate consent interview. Aug '09 - Oct '09 Discussion with factory is taken for work after 10 pm. Document review and workers COMPLETE Aug '09 - Oct '09 Discussion with factory management regarding this issue has unveiled an obvious communication gap between the management team and the factory staff. We are hopeful that the WPC will assist communication on all levels. We have expressed our concern over the scheduling of female workers outside of the accepted hours and have been assured that these practices will no longer be followed. longer be followed.
Overtime hours worked in excess of code standard will be voluntary No recording system of voluntary overtime.		Records reviewed and worker interview	All overtime should be voluntary and a sign up sheet should be posted for all overtime work. The factory will update its worker handbook to reflect this policy and start it by October 1, 2005. Send Top of the World/Outdoor Cap a copy of the revised handbook and a sign up sheet from October by November 15, 2005.	sheet to prove all overtime is voluntary. Besides this, the factory informs workers every day for their OT hours before starting their OT. The factory will send a copy of the revised handbook and a sign	given to TOW on December visit. The factory provided copies of voluntary OT sign up sheets. TOW found no evidence of forced OT	Factory maintained a sheet with workers' signatures to document workers' consent for voluntary overtime, but not on a regular basis.	Completed: workers signature in the time cards and OT sheet is maintained. Documents review and workers interview.
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			IEM Findings			Remediation		Updates (Cite Date	e of Follow up)	Third Party Verific	ation	Company Verification Follow up			erification Follow up
FLA Code/ Compliance issue Country Law/Legal Reference	ce FLA Benchmark	Non-compliance		If not corroborated, Sources/Documentation explain why used for corroborating Factory Management or Company		Target Factory Response (Optional) Completion Date	Company follow up (Cite date of follow up)	Company Follow up	Documentation	Third Party Verification (IEV: September 12, 2007)	Documentation	Company Follow up Docume	ation Third Party Verification Sources/Documentation (IEV: June 15-16, 2009) for corroborating		Documentation
Accurate recording of OT hours worked	in a workweek. Calculation of hours we	orked As the time and overtime recording system is worked manual and maintained by supervisor there is evidence of manipulation of the OT data by the floor level management as a punishment for mistake in the work		Management interview and attendance records review and payroll reviewed	Employees will be paid for all hours worked in a workweek. Calculation of hours worked must include all time that the employer allows or requires the worker to work. The factory shal immediately start using time cards for all record of time worked until the thumb reader electronic system is in place and operatin correctly, so the supervisors will not have control of any documents that can be manipulated. Please send Top of the World/Outdoor Cap copies of time cards for 10 employees for th month of October 2005, by November 15th.	g operating correctly. The factory will ser 10 time cards for Oct. by 11/15/05.	given to TOW on December visit. The factory has installed and is	ODC to get records from newly installed thumb reader. Records received and factory has now changed from thumb reader to card swipe because of accuracy. ODC witnessed employees swiping cards.		From the records review and worker interviews, we did not find any evidence of manipulation of the of records by the floor level management as a punishment for mistake in the work.			Completed: Recoding is still manual but no case of deduction identified.		
OT Compensation Awareness	Workers shall be informed about overti compensation rates, by oral and printed means	time Workers are not aware of the overtime rate and calculation system.		Worker interview	The factory shall starting in October 2005, provide a pay statement that will show the employees earned wages, regular ar overtime pay and hours, any bonuses and all deductions taken from their pay. Send Top of the World/Outdoor Cap 10 employees pay statements, time cards, salary sheets and attendance records for the month of October 2005, by Novembe 15, 2005.	statement that will show the employee wages, regular and overtime pay and hours, any bonuses and all deductions	Cap will check for pay statements			Workers are aware of their overtime hours and overtime compensation.	Interview with workers; review of workers' hand books, orientation program and schedules.		Completed: Workers are aware about the overtime hours and compensation.		
Miscellaneous															
Other (new and fired workers)			Factory does not maintain the number and the list of fired and newly recruited workers on a monthly basis. On the request of auditor factory could only provide records for new recruits on a monthly basis but failed to provide the record for terminated workers.	management interview and personnel files reviewed, workers	The factory shall immediately have all new employees and fired workers listed on all attendance records starting from the date of hire. Send Top of the World/Outdoor Cap 5 complete sets of ne employees' & fired workers' records, showing their application, contract, and for the month of October 2005, their attendance records, time cards and salary sheets by November 15, 2005.	11/15/2005 The factory now keeps all new employed and fired workers listed on all attendanc records starting from the date of hire.	The factory submitted records showing the immediate recording of s, new employee's attendance, time cards and salary sheets, Dec. 05.			Records were maintained for the disciplined or migrant workers on a monthly basis.	Review of workers' personnel files, migrants/terminated/newly recruited workers list, interview with management and workers.		Completed: Records are maintained for all the new workers and resigned / separated workers.		
Other (Workers Group insurance)													New finding: Workers group insurance is not renewed (ended on June 6, 2009). Document review and management interview. amount was paid by the factory on June' 16, 2009, the 2nd day of the audit but the certificate is not yet obtained. Document review and management interview.	COMPLETE June '09 Worker insurance payments were made on June 16, as noted in the audit findings. In discussing this matter with factory management, we expresse our concern over this expiring before th payment on the new term was in effect. Factory management assured TOW that this would not lapse again in the future, and we are hopeful that this is correct. Copies of the new insurance certificate have been uploaded onto the FFC site to verification.	e r ed he t. at ,