

### FLA Audit Profile

Factory Code	050039202H
Country	Jordan
FLA Affiliate	Liz Claiborne
Monitor	Level Works Limited
Audit Date	June 24-25, 2009
Products	Knit tops and bottoms
Processes	Cutting, Sewing, Finishing
Number of Workers	1839



**FAIR LABOR**  
ASSOCIATION™

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## Wages, Benefits and Overtime Compensation: B. Deposit of Legally Mandated Deductions

WBOT.13 All legally mandated deductions for taxes, social insurance, or other purposes shall be deposited each pay period in the legally defined account or transmitted to the legally defined agency. This includes any lawful garnishments for back taxes, etc. The employer shall not hold over any of these funds from one pay period to the other unless the law specifies that deposits are to be made less frequently than pay periods (e.g., monthly deposits, weekly pay). If the law does not specify, then deposits shall be made before the next pay period in all cases. (S)

Audit Date	Audit Type	Audit Scope	Auditor	Score
06/24/2009	External	FLA Independent External Monitoring	Level Works	Notable Feature

**Explanation:** [Factory pays full social insurance \(including worker contribution\) fee for the workers which is paid on a monthly basis to the relevant department.](#)

**Plan Of Action:**

**Deadline Date:**

**Supplier CAP:**

**Supplier CAP  
Date:**

**Action Taken:**

**Plan Complete:**

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Date:**

**Action Verified:**

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Date:**

**Comments:**

**Confidential  
Comments:**

## Wages, Benefits and Overtime Compensation: C. Employer Provided Services

WBOT.16 All workers have a right to use or not to use employer provided services, such as housing or meals. Deductions for services to workers shall not exceed the cost of the service to the employer. Employers must be able to demonstrate the accuracy or reasonableness of these charges. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
06/24/2009	External	FLA Independent External Monitoring	Level Works	Notable Feature

**Explanation:** [Factory provides food and accommodation free to the workers. Factory also provides \\$1.13 as fruit allowance every month for each worker.](#)

**Plan Of Action:**

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Supplier CAP:  
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## Wages, Benefits and Overtime Compensation: A. General Compliance Wages, Benefits and Overtime Compensation

WBOT.1 Employers shall comply with all local laws, regulations and procedures concerning the payment of wages and benefits, including overtime compensation. In any case where laws and the FLA Code are contradictory, the standard that provides the greatest protection for workers shall apply. Where provisions are lacking, employers shall take measures to reasonably accommodate matters concerning the payments of wages and benefits, including overtime compensation. (S)

Audit Date	Audit Type	Audit Scope	Auditor	Score
06/24/2009	External	FLA Independent External Monitoring	Level Works	Noncompliance

**Explanation:** Inconsistent and incomplete working hours, and wages/payment document provided by the factory which did not match the production records or working hour records; as a result total working hours, wages and benefits could not be verified. The daily production records show factory was open on two Fridays/ month on February'09 and March'09. But the workers time records and payroll do not reflect the working hours or day and relevant payment was missing.

**Plan Of Action:** Factory should provide accurate time attendance and payment records for review in the future. The attendance records should reflect actual working hours for each worker. This should include the normal working hours and any overtime hours done on weekdays / rest days as well. In addition, the payment records must be accurate and consistent with the actual time records. Factory need to make sure all wages, benefits and overtime compensation should meet the local standards. In addition, factory should establish a compensation policy in order to ensure its compliance in payroll consistency. Such policy should include the basic definition of wage calculation methods and different rates of pay. Also, different kinds of benefits like annual bonus / allowance, and deduction of social insurance / tax need to be indicated in the policy and workers' pay slips. Moreover, the policy should include a commitment that all payroll / hours recording and benefits comply with the local legal and buyer's COC requirements. If there are any questions regarding incorrect calculation of payroll / complaints, workers can use the grievance system to report to relevant departments. Factory should organize training to communicate this policy to their workers.

**Deadline Date:** 11/21/2009

**Supplier** Factory confirmed that they will provide accurate time attendance and payment

**CAP:** records for onsite checking in the future. Factory explained that the reason for inconsistency is because some Bangladeshi workers came in to practice on rest days (2 Fridays in February / March 09). Most of them are new and unskilled workers. However, as their wages are paid by piece rate, they wanted to do more practice in their rest time in order to increase productivity as soon as possible. Those workers believe that they don't need to swipe the cards as it is only practice. So, it resulted in the inconsistency. Factory promised that they will educate all supervisors and workers about the importance of swiping cards when coming in / out of factory. Also, they had compensated all outstanding OT wages to workers on July 09. In addition, factory agreed to establish a compensation policy to ensure its compliance in payroll consistency. Also, factory will organize relevant compensation policy training for their workers in the future. Company will conduct a follow up audit in Nov 09 for verification.

**Supplier CAP** 10/30/2009

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**Comments:**

## Wages, Benefits and Overtime Compensation: B. Minimum Wage

WBOT.2 Employers shall pay workers at least the legal minimum wage or the prevailing industry wage, whichever is higher. (S)

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## Wages, Benefits and Overtime Compensation: F. Payment for All Hours Worked

WBOT.7 Workers shall 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. (S)

Audit Date	Audit Type	Audit Scope	Auditor	Score
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050039202H – Jordan: Liz Claiborne

06/24/2009 External FLA Independent External Monitoring Level Works Noncompliance

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## Wages, Benefits and Overtime Compensation: G. Calculation Basis for Overtime Payments

WBOT.8 Employers shall compensate workers for all hours worked. For workers on a piece rate payment scheme or any other incentive scheme, payments for overtime hours worked shall be calculated by applying the premium rate required by law or this Code on the same payment scheme as is used for calculating wages for normal working hours, unless the payment scheme used leads to higher wages for workers. (S)

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## Wages, Benefits and Overtime Compensation: I. Premium/Overtime Compensation

WBOT.10 The factory shall comply with all applicable laws, regulations and procedures governing the payment of premium rates for work on holidays, rest days, and overtime. (S)

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**Explanation:** Inconsistent and incomplete working hours and wages/payment document provided by the factory which did not match the production records or working hours records; as a result, total working hours, wages and benefits could not be verified. The daily production records show factory was open on two Fridays/ month in February'09 and March'09. But the workers time records and payroll do not reflect the working hours or day and relevant payment was missing.

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**Supplier CAP Date:** 10/30/2009

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## Wages, Benefits and Overtime Compensation: J. Overtime Compensation Awareness

WBOT.11 Workers shall be informed, orally and in writing, about overtime compensation rates prior to undertaking overtime. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
06/24/2009	External	FLA Independent External Monitoring	Level Works	Noncompliance

**Explanation:** Payroll is not in Bengali language and workers cannot understand their wage calculation. Workers can only say that their wages are calculated on piece rate production basis.

**Plan Of Action:** Factory should provide payrolls for Bangladeshi workers in their local language (Bengali). Besides providing the Bengali payrolls, factory should also provide adequate training to workers about their salary calculation. Such training should be conducted at least twice per year. Also, factory has the responsibility to inform

the basic calculation for new workers on the first day of commencement.

**Deadline Date:** 11/21/2009

**Supplier CAP:** Factory agreed to provide a “pay slip sample” that is translated into Bengali to each Bangladeshi worker. Bangladeshi workers can use such “pay slip sample” as a guideline when checking the salary calculation monthly. In addition, factory will provide internal training of the payment slip details / method of salary calculation in July 09. Factory had checked with the payroll system supplier; found that the current system cannot support the Bengali language. For this reason, providing “pay slip sample” / training are the only solution to solve the problem currently. Company will conduct a follow up audit in Nov 09 for verification.

**Supplier CAP Date:** 08/05/2009

**Action Taken:**

**Plan Complete:**

**Plan Complete Date:**

**Action Verified:**

**Action Verified Text:**

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**Comments:**  
**Confidential Comments:**

## Wages, Benefits and Overtime Compensation: N. Accurate Calculation and Recording of Wage Compensation

WBOT.17 All payments to workers, including hourly wages, piecework, benefits, bonuses, and other incentives shall be calculated and recorded accurately. (S)

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accurate and consistent with the actual time records. Factory needs to make sure all wages, benefits and overtime compensation should meet the local standards. In addition, factory should establish a compensation policy in order to ensure its compliance in payroll consistency. Such policy should include the basic definition of wages calculation methods and different rates of pay. Also, different kinds of benefits like annual bonus / allowance, and deduction of social insurance / tax need to be indicated in the policy and workers' pay slips. Moreover, the policy should include a commitment that all payroll / hours recording and benefits comply with the local legal and buyer's COC requirements. If there are any questions regarding incorrect calculation of payroll / complaints, workers can use the grievance system to report to relevant departments. Factory should organize training to communicate this policy to their workers.

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**Supplier CAP Date:** 10/30/2009

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## Wages, Benefits and Overtime Compensation: O. False Payroll Records

WBOT.19 Employers shall not use hidden or multiple payroll records in order to hide overtime, to falsely demonstrate hourly wages, or for any other fraudulent reason. Payroll records maintained shall be authentic and accurate. (P)

050039202H – Jordan: Liz Claiborne

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06/24/2009	External	FLA Independent External Monitoring	Level Works	Noncompliance

**Explanation:** Inconsistent and incomplete working hours, and wages/payment document provided by the factory which did not match with the production records or working hour records; as a result total working hour, wages and benefits could not be verified. The daily production records show factory was open on two Fridays/ month on February'09 and March'09. But the workers time records and payroll do not reflect the working hour or day and relevant payment was missing. So the double or single recording could not be confirmed.

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## Wages, Benefits and Overtime Compensation: P. Payroll Record Maintenance/Worker Acknowledgement

WBOT.20 All compensation records shall be maintained accurately and shall be acknowledged by the worker as accurate. (P)

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## Wages, Benefits and Overtime Compensation: Q. Record Maintenance

WBOT.21 Employers shall ensure that all legally required payroll documents, journals and reports are available, complete, accurate and up-to-date. (P)

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## Wages, Benefits and Overtime Compensation: R. Worker Wage Awareness

WBOT.22 Employers shall make every reasonable effort to ensure workers understand the wages, including the calculation of wages, incentives systems, benefits and bonuses they are entitled to in a factory and under applicable laws. To this end, employers shall communicate orally and in writing to all workers all relevant information in the local language or language(s) spoken by the workers, if different from the local language. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
06/24/2009	External	FLA Independent External Monitoring	Level Works	Noncompliance

**Explanation:** Bangladeshi workers Payroll is not in Bengali language and workers cannot understand their wage calculation. Workers can only say that their wages are calculated on piece rate production basis.

**Plan Of Action:** Factory should provide payrolls for Bangladeshi workers in their local language (Bengali). Besides providing the Bengali payrolls, factory should also provide

adequate training to workers about their salary calculation. Such training should be conducted at least twice per year. Also, factory has the responsibility to inform the basic calculation for new workers on the first day of commencement.

**Deadline Date:** 11/21/2009

**Supplier CAP:** Factory agreed to provide a “pay slip sample” that is translated into Bengali to each Bangladeshi worker. Bangladeshi workers can use such “pay slip sample” as a guideline when checking the salary calculation monthly. In addition, factory will provide internal training of the payment slip details / method of salary calculation in July 09. Factory had checked with the payroll system supplier; found that the current system cannot support the Bengali language. For this reason, providing “pay slip sample” / training are the only solutions to solve the problem currently. Company will conduct a follow up audit in Nov 09 for verification.

**Supplier CAP Date:** 08/05/2009

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### Wages, Benefits and Overtime Compensation: V. Pay Statement

WBOT.26 Employers shall provide workers a pay statement each pay period, which shall show earned wages, wage calculations, regular and overtime pay, bonuses, all deductions and final total wage. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
06/24/2009	External	FLA Independent External Monitoring	Level Works	Noncompliance

**Explanation:** Bangladeshi workers Payroll and pay slip as pay statement is not in Bengali language. It is in English or a Chinese language and workers cannot understand their wage calculation. Workers can only say that their wages are calculated on piece rate production basis.

**Plan Of Action:** Factory should provide payrolls for Bangladeshi workers in their local language (Bengali). Besides providing the Bengali payrolls, factory should also provide adequate training to workers about their salary calculation. Such training should be conducted at least twice per year. Also, factory has the responsibility to inform the basic calculation for new workers on the first day of commencement.

**Deadline** 11/21/2009



**Date:**  
**Supplier CAP:** Factory agreed to provide a “pay slip sample” that is translated into Bengali to each Bangladesh worker. Bangladeshi workers can use such “pay slip sample” as a guideline when checking the salary calculation monthly. In addition, factory will provide internal training of the payment slip details / method of salary calculation in July 09. Factory had checked with the payroll system supplier; found that the current system cannot support the Bengali language. For this reason, providing “pay slip sample” / training are the only solutions to solve the problem currently. Company will conduct a follow up audit in Nov 09 for verification.

**Supplier CAP Date:** 08/05/2009

**Action Taken:**

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### Miscellaneous: A. Code Awareness

GEN.3 Develop a secure communications channel, in a manner appropriate to the culture and situation, to enable Company employees and employees of contractors and suppliers to report to the Company on noncompliance with the workplace standards, with security that they shall not be punished or prejudiced for doing so.

Audit Date	Audit Type	Audit Scope	Auditor	Score
06/24/2009	External	FLA Independent External Monitoring	Level Works	Noncompliance

**Explanation:** No initiative or training or guidance given by the company to the factory. Factory was only audited by the third party audit company so far. On the code, company representative's phone number (non local number) is written as confidential noncompliance reporting mechanism. Workers are not aware about the communication system or the existence of the phone number.

**Plan Of Action:** Company will provide the most updated company's Code to factory. In addition, factory should contact company if they are unclear about the company's COC requirements. Moreover, factory should provide training to workers about company's Code of Conduct and contact information including phone no., address, fax no. and email as a confidential channel to workers so that company can develop a secure communications channel for workers to report to the Company on noncompliance with the workplace standards without any retaliation. Such training should be conducted at least twice per year.

**Deadline Date:** 11/21/2009

**Supplier CAP:** Company will continuously work with factory to develop the internal COC training program for workers. Also, company will arrange necessary training / conference with factory if there any changes or updates of FLA / company standards. In addition, factory agreed to conduct seminars on a quarterly basis to address the codes of all brands, and to educate the workers to enhance the general awareness of their basic rights. Company will conduct a follow up audit in Nov 09 for verification.

**Supplier CAP Date:** 08/05/2009

**Action Taken:**

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**Plan Complete Date:**

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**Action Verified Date:**

**Comments:**

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## Health and Safety: V. Sanitation in Factory Facilities

H&S.22 All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with all applicable laws, including relevant sanitation, medical and safety and health regulations. (S)

Audit Date	Audit Type	Audit Scope	Auditor	Score
06/24/2009	External	FLA Independent External Monitoring	Level Works	Noncompliance

**Explanation:** Toilets are not clean and create a bad smell inside the factory.

**Plan Of Action:** Factory should arrange housekeepers to clean up toilets regularly. The hygienic standards of toilets should be kept at an acceptable level.

**Deadline Date:** 11/21/2009

**Supplier CAP:**

Factory agreed to increase the cleaning schedule of toilets up to every 30 minutes. Management will assign administration staff to conduct regular checking hourly. Company will conduct a follow up audit in Nov 09 for verification.

**Supplier CAP Date:** 08/05/2009

**Action Taken:**

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## Health and Safety: ZB. Sanitation in Dormitories

H&S.28 All dormitories shall be kept secure, clean and have safety provisions (such as fire extinguishers, first aid kits, unobstructed emergency exits, emergency lighting etc.). Emergency evacuation drills shall also be conducted at least annually. (S)

Audit Date	Audit Type	Audit Scope	Auditor	Score
06/24/2009	External	FLA Independent External Monitoring	Level Works	Noncompliance

**Explanation:** Evacuation plan was found in Chinese in Bangladeshi workers dormitory (Bengali missing).

**Plan Of Action:** Factory should provide adequate evacuation plan in Bangladeshi workers dormitory. Such evacuation plans should be translated into workers' local language (Bengali). During fire training, management should explain the evacuation procedures to workers clearly and make sure that workers understand the procedure and how to read details on evacuation plan.

**Deadline Date:** 11/21/2009

**Supplier CAP:** Factory agreed to provide adequate evacuation plans at the workers dormitory. Also, such plans were translated into Bengali and posted at dormitory on July 09. Company will conduct a follow up audit in Nov 09 for verification.

**Supplier CAP Date:** 08/05/2009

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**Hours of Work: A. General Compliance Hours of Work**

HOW.1 Employers shall comply with all local laws, regulations and procedures concerning hours of work, public holidays and leave. (S)

Audit Date	Audit Type	Audit Scope	Auditor	Score
06/24/2009	External	FLA Independent External Monitoring	Level Works	Noncompliance

**Explanation:** Inconsistent and incomplete working hours, and wages/payment document provided by the factory which did not match the production records or working hours records; as a result total working hours, wages and benefits could not be verified. The daily production records show factory was open on two Fridays/ month in February'09 and March'09. But the workers time records and payroll do not reflect the working hours or day and relevant payment was missing.

**Plan Of Action:** Factory should provide accurate time attendance and payment records for review in the future. The attendance records should reflect actual working hours for each worker. This should include the normal working hours and any overtime hours done on weekdays / rest days as well. In addition, the payment record must be accurate and consistent with the actual time records. Factory needs to make sure all wages, benefits and overtime compensation should meet the local standards. Moreover, factory should establish a compensation policy in order to ensure its compliance in payroll consistency. Such policy should include the basic definition of wage calculation methods and different rates of pay. Also, different kinds of benefits like annual bonus / allowance, and deduction of social insurance / tax need to be indicated in the policy and workers' pay slips. The policy should include a commitment that all payroll / hours recording and benefits comply with the local legal and buyer's COC requirements. If there are any questions regarding incorrect calculation of payroll / complaints, workers can use the grievance system to report to relevant departments. Factory should organize training to communicate this policy to their workers.

**Deadline Date:** 11/21/2009

**Supplier CAP:** Factory confirmed that they will provide accurate time attendance and payment records for onsite checking in the future. Factory explained that the reason for inconsistency is because some Bangladeshi workers came in to practice on rest days (2 Fridays in February / March 09). Most of them are new and unskilled workers. However, as their wages are paid by piece rate, they want to do more practice in their rest time in order to increase productivity as soon as possible. Those workers believe that they don't need to swipe the cards as it is only practicing. So, it resulted in the inconsistency. Factory promised that they will educate all supervisors and workers about the importance of swiping cards when coming in / out of factory. Also, they had compensated all outstanding OT wages to workers in July 09. In addition, factory agreed to establish a compensation policy to ensure its compliance in payroll consistency. Also, factory will organize relevant compensation policy training for their workers in the future. Company will conduct a follow up audit in Nov 09 for verification.

**Supplier CAP Date:** 10/30/2009

**Action Taken:**

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## Hours of Work: B. Rest Day

HOW.2 Workers shall be entitled to at least one day off in every seven-day period. If workers must work on a rest day, an alternative day off must be provided within that same seven-day period or immediately following the seven-day period. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
06/24/2009	External	FLA Independent External Monitoring	Level Works	Noncompliance

**Explanation:** Inconsistent and incomplete working hours, and wages/payment document provided by the factory which did not match the production records or working hours records; as a result, total working hours, wages and benefits could not be verified. The daily production records show factory was open on two Fridays/ month on February'09 and March'09. But the workers time records and payroll do not reflect the working hours or day and relevant payment was missing.

**Plan Of Action:** Factory should provide accurate time attendance and payment records for review in the future. The attendance records should reflect actual working hours for each worker. This should include the normal working hours and any overtime hours done on weekdays / rest days as well. In addition, the payment record must be accurate and consistent with the actual time records. Factory needs to make sure all wages, benefits and overtime compensation should meet the local standards. In addition, factory should establish a compensation policy in order to ensure its compliance in payroll consistency. Such policy should include the basic definition of wage calculation methods and different rates of pay. Also, different kinds of benefits like annual bonus / allowance, and deduction of social insurance / tax need to be indicated in the policy and workers' pay slips. Moreover, the policy should include a commitment that all payroll / hours recording and benefits comply with the local legal and buyer's COC requirements. If there are any questions regarding incorrect calculation of payroll / complaints, workers can use the grievance system to report to relevant departments. Factory should organize training to communicate this policy to their workers.

**Deadline Date:** 11/21/2009

**Supplier CAP:** Factory confirmed that they will provide accurate time attendance and payment records for onsite checking in the future. Factory explained that the reason for inconsistency is because some Bangladeshi workers came in to practice on rest days (2 Fridays in February / March 09). Most of them are new and unskilled workers. However, as their wages are paid by piece rate, so they want to do more practice in their rest time in order to increase productivity as soon as possible. Those workers believe that they don't need to swipe the cards as it is only practicing. So, it resulted in the inconsistency. Factory promised that they will educate all supervisors and workers about the importance of swiping cards when coming in / out of factory. Also, they had compensated all outstanding OT wages to workers in July 09. In addition, factory agreed to establish a compensation policy to ensure its compliance in payroll consistency. Also, factory will organize

relevant compensation policy training to their workers in the future. Company will conduct a follow up audit in Nov 09 for verification.

**Supplier CAP** 10/30/2009

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## Hours of Work: F. Time Recording System

HOW.6 Time worked by all workers, regardless of compensation system, shall be fully documented by time cards or other accurate and reliable recording systems such as electronic swipe cards. Employers are prohibited from maintaining multiple time-keeping systems and/or false records for any fraudulent reason, such as to falsely demonstrate working hours. Time records maintained shall be authentic and accurate. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
06/24/2009	External	FLA Independent External Monitoring	Level Works	Noncompliance

**Explanation:** Inconsistent and incomplete working hours, and wages/payment document provided by the factory which did not match the production records or working hours records; as a result, total working hours, wages and benefits could not be verified. The daily production records show factory was open on two Fridays/ month in February'09 and March'09. But the workers time records and payroll do not reflect the working hours or day and relevant payment was missing.

**Plan Of Action:** Factory should provide accurate time attendance and payment records for review in the future. The attendance records should reflect actual working hours for each worker. This should include the normal working hours and any overtime hours done on weekdays / rest days as well. In addition, the payment record must be accurate and consistent to the actual time records. Factory need to make sure all wages, benefits and overtime compensation should meet the local standards. In addition, factory should establish a compensation policy in order to ensure its compliance in payroll consistency. Such policy should include the basic definition of wage calculation methods and different rates of pay. Also, different kinds of benefits like annual bonus / allowance, and deduction of social insurance / tax need to be indicated in the policy and workers' pay slip. Moreover, the policy should include a commitment that all payroll / hours recording and benefits comply with the local legal and buyer's COC requirements. If there are any questions regarding incorrect calculation of payroll / complaints, workers can use the grievance system to report to relevant departments. Factory should organize

training to communicate this policy to their workers.

**Deadline Date:** 11/21/2009

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**Supplier CAP Date:** 10/30/2009

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### Hours of Work: M. Public Holidays

HOW.13 Employers shall provide workers with all official public holidays as required under local laws, regulations and procedures. (S)

Audit Date	Audit Type	Audit Scope	Auditor	Score
06/24/2009	External	FLA Independent External Monitoring	Level Works	Noncompliance

**Explanation:** Inconsistent and incomplete working hours, and wages/payment document provided by the factory which did not match the production records or working hours records; as a result total working hours, wages and benefits could not be verified. The daily production records show factory was open on two Fridays/ month on February'09 and March'09. But the workers time records and payroll do not reflect the working hours or day and relevant payment was missing.

**Plan Of Action:** Factory should provide accurate time attendance and payment records for review in the future. The attendance records should reflect actual working hours for each worker. This should include the normal working hours and any overtime hours

done on weekdays / rest days as well. In addition, the payment record must be accurate and consistent with the actual time records. Factory needs to make sure all wages, benefits and overtime compensation should meet the local standards. In addition, factory should establish a compensation policy in order to ensure its compliance in payroll consistency. Such policy should include the basic definition of wage calculation methods and different rates of pay. Also, different kinds of benefits like annual bonus / allowance, and deduction of social insurance / tax need to be indicated in the policy and workers' pay slips. Moreover, the policy should include a commitment that all payroll / hours recording and benefits comply with the local legal and buyer's COC requirements. If there are any questions regarding incorrect calculation of payroll / complaints, workers can use the grievance system to report to relevant departments. Factory should organize training to communicate this policy to their workers.

**Deadline Date:** 11/21/2009

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