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Social Responsibility Compliance Manual

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1. INTRODUCTION

Jenkins Enterprises, Inc. (Jenkins) strives to conduct business in accordance with high ethical business standards. To support this initiative, Jenkins has made a commitment to engage with manufacturers to help ensure that collegiate licensed products are manufactured in safe, healthy environments that respect workers' rights. Jenkins has adopted its own Workplace Code of Conduct (COC) and established a process to verify that factories manufacturing collegiate branded products meet a required level of compliance with international labor standards and country specific laws.

Jenkins has established their own internal social responsibility programs and requires authorized manufacturers (AMA's) to submit to regular third-party factory monitoring to verify compliance with Jenkins Workplace COC. In addition, social compliance audits are used to assess whether factories have systems and policies in place that will facilitate ongoing compliance. Jenkins seeks to work with factories that have internal policies and programs to ensure our products are made in factories with acceptable working conditions. Both Jenkins and factory managers are expected to take an active role in this ongoing process.

This manual provides an overview of the roles and responsibilities of Jenkins, as well as the standards that authorized manufacturers of licensed products are expected to uphold. Specifically, this manual contains the following sections:

Overview of Jenkins Key Responsibilities: describes the role Jenkins plays in achieving social compliance throughout the manufacturing process.

Jenkins Workplace Code of Conduct: describes the requirements all manufacture and their factories must adhere to.

Communicating Expectations to Factories: explains what aspects of Jenkins requirements should be communicated to manufacturing facilities. This includes an overview of the audit process as well as consideration in addressing non-compliance issues.

We look forward to partnering with you in our continuous effort to have licensed products manufactured in factories that offer safe, healthy and fair working conditions.

2. REVIEW OF KEY RESPONSIBILITIES

As a licensee and ensuring that our products are manufactured in factories with acceptable working conditions, we require cooperation to facilitate a successful social compliance program.

2.1 PROCESS OVERVIEW

1. Company Corporate Social Responsibility (CSR) Contact

Jenkins Enterprises has designated a person responsible for the implementation of standards at the manufacturing facilities producing licensed products. The CSR contact is an individual who has visibility into the supply chain and can communicate code of conduct expectations to manufacturers. This individual is also responsible for obtaining and reviewing social compliance audit reports, evaluating whether factory corrective action is necessary and if so, work with factories to resolve issues.

Our CSR contact is: Bill Tibbett. bill@jenkins-enterprises.com

2. Establish Internal CSR Program

a. Jenkins has established our own internal CSR program including specific processes geared toward achieving ongoing, sustainable compliance with our AMA's facilities and those we contract with.

3. Submit Factory Information

a. Jenkins has disclosed all factories manufacturing licensed products. This includes those factories owned and operated by our company and third party, as well as any subcontractors. This also means that if we change or add factories over time, we will provide updated information.

b. ***Important*** All manufacturing facilities are notified of Jenkins Workplace Code of Conduct and compliance requirements. Specifically, all factories are aware that Jenkins staff and/or third party auditors may conduct an audit of their facility per the terms of our COC.

c. Jenkins requires all factories manufacturing facilities to post the Jenkins Workplace Code of Conduct in their facility in a visible area for all workers and members of staff to review at any time.

4. Meet Third Party Factory Monitoring Requirements

a. Jenkins is required to facilitate social compliance audits of those factories producing branded products.

b. Once we receive a factory audit report (either from an audit firm or one that has recently been conducted by another buyer or third party), we will review the results to determine whether further action is needed.

c. Audit reports will need to be available in a digital format.

5. Address Any/All Non-Compliance Issues with a Corrective Action Plan

a. In cases where there are moderate non-compliance issues it is expected that the factory takes corrective action immediately in order to remedy these issues in the spirit of continuous improvement. The third-party audit teams will discuss the necessary corrective actions onsite in the closing meeting. Factory management will review the findings with the auditors and are expected to outline agreed-upon actions. Jenkins is required to ensure all corrective action improvements are addressed.

b. In cases of major non-compliance issues, the factory must adhere to a corrective action plan with a specific time frame outlined. The non-compliance issues and necessary corrective actions will be discussed onsite with the factory in the closing meeting of the audit; however, it is the responsibility of the Jenkins to ensure the factory establishes an acceptable timeframe in which they will make these improvements.

c. The factory shall designate one or more of its management staff to be responsible for implementation and monitoring for compliance with the standards laid out in this code of conduct within the manufacturing facilities, and the manufacturing facilities of its subcontractors.

3. Jenkins Enterprises Workplace Code of Conduct

Preamble

The FLA Workplace Code of Conduct defines labor standards that aim to achieve decent and humane working conditions. The Code's standards are based on International Labor Organization standards and internationally accepted good labor practices.

Companies affiliated with the FLA are expected to comply with all relevant and applicable laws and regulations of the country in which workers are employed and to implement the Workplace Code in their applicable facilities. When differences or conflicts in standards arise, affiliated companies are expected to apply the highest standard.

The FLA monitors compliance with the Workplace Code by carefully examining adherence to the Compliance Benchmarks and the Principles of Monitoring. The Compliance Benchmarks identify specific requirements for meeting each Code standard, while the Principles of Monitoring guide the assessment of compliance. The FLA expects affiliated companies to make improvements when Code standards are not met and to develop sustainable mechanisms to ensure ongoing compliance.

The FLA provides a model of collaboration, accountability, and transparency and serves as a catalyst for positive change in workplace conditions. As an organization that promotes continuous improvement, the FLA strives to be a global leader in establishing best practices for respectful and ethical treatment of workers, and in promoting sustainable conditions through which workers earn fair wages in safe and healthy workplaces.

Employment Relationship

Employers shall adopt and adhere to rules and conditions of employment that respect workers and at a minimum, safeguard their rights under national and international labor and social security laws and regulations.

Code of Ethics

Employers shall adhere to the highest standards of ethical behavior. Our Code of Ethics, of which Integrity is the primary element, strictly prohibits (under any circumstances) Suppliers from giving in to demands or requests for benefits from any third-party representatives, as well as colluding or offering a bribe, payment or benefits to a third-party representative. A full list of the benchmarks for each Code has been noted at the end of the Manual, in Appendix 5.2

Forced Labor *

There shall not be any use of forced labor, including prison labor, indentured labor, bonded labor, or other forms of forced labor.

Proof of Age*

No person shall be employed under the age of 15 or under the age for completion of compulsory education, whichever is higher.

Harassment or Abuse *

Every employee shall be treated with respect and dignity. No employee shall be subject to any physical, sexual, psychological, or verbal harassment or abuse.

Nondiscrimination

No person shall be subject to any discrimination in employment, including hiring, salary, benefits, advancement, discipline, termination, or retirement, based on gender, race, religion, age, disability, sexual orientation, nationality, political opinion, or social or ethnic origin.

Health and Safety *

Employers shall provide a safe and healthy workplace setting to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or because of the operation of employers' facilities. Employers shall adopt responsible measures to mitigate negative impacts that the workplace has on the environment.

Freedom of Association and Collective Bargaining

Employers shall recognize and respect the right of employees to freedom of association and collective bargaining.

Compensation*

Every worker has a right to compensation for a regular work week that is sufficient to meet a worker’s basic needs and provide some discretionary income. Employers shall pay at least the minimum wage or the appropriate prevailing wage, whichever is higher, comply with all legal requirements on wages, and provide any fringe benefits required by law or contract. Where compensation does not meet workers basic needs and provides some discretionary income, each employer shall work with the FLA to take appropriate actions that seek to progressively realize a level of compensation that does.

Hours of Work*

Employers shall not require workers to work more than the regular and overtime hours allowed by the law of the country where workers are employed. The regular work week shall not exceed 48 hours. Employers shall allow workers at least 24 consecutive hours of rest in every seven-day period. All overtime shall be consensual.

Employers shall not request overtime on a regular basis and shall compensate all overtime work at a premium rate. Other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours.

Subcontracting

Employers conducting any outsourced, subcontracted work or subassembly shall notify Jenkins Enterprises prior to engaging in such work. If subcontracted work is done at another location and Jenkins Enterprises has been notified of the location, the Employer that was issued the original production request shall be responsible for assuring that the subcontractor follows Jenkins Enterprises Code of Conduct.

Environment

Employers shall comply with all environmental laws, regulations, and standards applicable to their industry, and shall have written environmental policies to lessen their negative impact on the environment.

*Denotes major non-compliance Issues

**All references to local law throughout this Code shall include regulations implemented in accordance with applicable local laws.

4. COMMUNICATING EXPECTATIONS TO FACTORIES

Jenkins is to address the following with their suppliers and ensure they are aware of what to expect in doing business with us.

4.1 UNDERSTANDING THE REQUIREMENTS AND AUDIT PREPARATION

Factories will be aware of the Major Non-compliance Issues as described on the previous page. In particular, the importance of having accurate and reliable time and payroll records kept onsite for review by auditors.

AUDIT REQUIREMENTS

Jenkins requires documentation that demonstrates a factory manufacturing licensed product is, at a minimum, in compliance with local and international laws, and in compliance with our Workplace Code of Conduct and Fair Labor Association (FLA) monitoring standards.

It is not uncommon for factories to be audited every month by a different buyer, retailer or brand. We encourage our factories to share this information to avoid redundant auditing. To expedite the approval process, and avoid redundant auditing, if our factory has been audited during the last six (6) months and can share the results we will use this information in place of conducting an audit.

4.2 THE AUDIT PROCESS

Scheduling an Audit

To assist us with scheduling an audit, we use the Audit Request Form (Appendix A).

While there are variations in the social auditing process depending on the company and/or individual conducting the audit, the following provides an overview of the typical components. Factories will be familiar with what this process entails and the expectations regarding the time commitment and level of access required.

The labor compliance assessment is used to determine and report on a particular factory's level of compliance with local laws and our standards. The goal is to promote increased awareness of labor conditions within the supply chain and to facilitate corrective action if necessary. The assessment process itself requires that information be gathered from management interviews, employee interviews, visual observation, and document/records review. Initial visits generally last from 1-4 days, and follow-up visits from 1-2 days, depending on the size of the factory and severity of issues found. We understand that the success of each assessment depends on the willingness of the factory management to provide access to factory grounds, relevant records, and employees for interview.

Assessment Preparation

Prior to conducting the assessment, auditors will familiarize themselves with the factory, including a review of the following:

- *Factory contact*
- *Applicable country specific laws and standards*
- *Factory profile information*
- *Self-assessment questionnaires*
- *Review of previous assessment reports and history*
- *Review of all outstanding corrective action plans*
- *Names of employees interviewed during previous assessment*
- *Appropriate documentation:*

Opening Meeting

The opening meeting with management is an extremely important part of the process because it sets the tone for the entire assessment. A well-executed opening meeting can make a significant difference in how smoothly and how long the assessment takes. Specifically, during the opening meeting the auditor's staff will:

- *Establish appropriate communication channels*
- *Review the scope and goals of the assessment*
- *Provide management with a specific list of records that will be needed for review*
- *Discuss the assessment team's role as an objective verifier only*
- *Present and discuss Jenkins Code of Conduct (COC) and/or standards*
- *Interview factory management about operational processes*

Factory Tour

In determining compliance, information gathered through visual observation is critical. For this reason the audit staff is trained to do detailed and in-depth observation of the workplace health, safety and environmental conditions, with a focus on how those conditions impact the employees. Examples of what auditors may look for during a facility tour:

- *Clear, unblocked aisles on the production floor*
- *Clear evacuation-exit diagrams posted on the walls*
- *Well stocked first-aid kits*
- *Machine guards and personal protective equipment such as safety glasses*

Auditors will also observe employees for signs that might relate to other areas of compliance. For example: how managers, supervisors, and employees interact amongst themselves and with one another. In general, the audit staff is instructed to draw upon his/her common sense and professional experience.

Employee Interviews

Confidential interviews with employees are fundamental to the success of the assessment because they provide the most direct source of information about how working conditions impact employee well-being. However, employee interviews require great care and sensitivity to local conditions and must always be conducted in a manner that ensures that employees will not face retaliation because of their participation. Specifically, audit staff is expected to crosscheck information gathered from other information sources, detect potential areas of concern, and to assess the awareness level of the employees during each interview. The role of the auditor is not to educate, debate, or argue with employees for any reason.

Document & Records Review

Documents and records review is done for a number of reasons which include gathering information regarding wages and benefits, hours of work, company policies, discrimination, health & safety, child labor, etc. Prior to reviewing records, the audit staff must first familiarize themselves with the procedures and systems of the factory. As well as checking the content of the documents and records, it's also important to assess how they are controlled to ensure ongoing compliance. Examples of potential documents the auditor may review are as follows:

- *Facility floor plan*
- *Labor contracts*
- *Employee handbook (terms and conditions of employment)*
- *Wages and hours policies*
- *Collective bargaining agreements*
- *A list of all the chemicals and solvents used onsite*
- *Permits, certificates of operations*
- *Government inspection reports such as sanitation, fire safety, structural safety, environmental compliance, etc.*
- *Machinery inspection service logs*
- *Policies and procedures on use of personal protective equipment*
- *Accident injury logs*
- *Emergency medical procedures*
- *Evacuation plans*
- *Timecard or other work-hour support*
- *Payroll records for the last six months (i.e. piece rate records)*
- *Support for overtime calculations*
- *Production records*
- *Individual employee files (including employment contracts)*
- *Documentation for age verification (national or regional IDs, educational certificates, certificates of good health, etc.)*

Closing Meeting

Once the assessment is complete, a closing meeting will be held with factory management. During this meeting, management will be provided with a final opportunity to clarify factory policies and practices as they relate to issues of non-compliance. This is of particular importance when inconsistent and/or unclear data has been collected. Generally, the closing meeting includes:

- *Acknowledgement of factory management cooperation*
- *Restatement of the purpose of the assessment*
- *Presentation and review of a draft list of each non-conformity*
- *Discussion of corrective action steps the factory will take to fix non-conformity*

Reporting

The end product the auditor provides is the assessment report(s). The final report will be provided to Jenkins.

Audit Results and Next Steps

The audit results are communicated to factory management during the closing meeting. At that time, it is expected that factory management will discuss and commit to making improvements related to each non-compliance issue within a reasonable timeframe. It is the responsibility of Jenkins to ensure these corrective actions are taken and that a timeframe is established and followed.

4.3 Additional Audit Requirements

Oversee Corrective Action Plan (CAP)

Jenkins is expected to work with our factories to ensure effective and timely remediation of areas of non-compliance when they are found. We will ensure that proper follow-up and actions are taken to improve any/all non-compliance issues. Jenkins will be prepared to provide proof of improvements (such as photos, documentation etc.) at any time after the assessment is conducted.

5.1 Appendix A: Audit Request Form

Instructions: To request an audit, please complete this form and return it to a Jenkins Enterprises approved monitoring firm.

Requesting Company Information

LICENSEE REQUESTING AUDIT:

Company Name: Jenkins Enterprises, Inc.
Address: 7200 Industry Drive
City: North little Rock
Province/State: Arkansas
Postal Code: 72117
Country: USA
Contact Name: Bill Tibbett
Phone: 501-945-2600
Fax: 501-801-1382
E-mail: bill@jenkins-enterprises.com

COMPANY PAYING FOR AUDIT (if different from above)

Company Name:
Billing Address:
City:
Province/State:
Postal Code:
Country:
Contact Name:
Phone:
Fax:
E-mail:

Note to Paying Company: Payment of the audit permits the release of the collected data of the audited facility compiled by the Audit Firm to be released to Jenkins Enterprises. Included within this release is any monitoring data obtained through audits and verification.

**Manufacturing Facility Information
Factory (Manufacturing facility to be audited)**

Factory Name:
Factory Address:
City:
Province/State:
Postal Code:
Country:
Contact Name:
Phone:
Fax:
Email:
Number of workers:
Language spoken by workers:
Other brands/buyers:

Date of request:

Date by which audit results are needed: What type of audit are you requesting?

- Initial Audit**
This factory is a new supplier, Jenkins and has not been audited within the last 12 months and/or existing audit report isn't sufficient.
- Follow-up Audit**
This factory was audited, and major compliance issues were found. A copy of the previous results is being submitted with this request.
- Annual Audit**
This factory was audited within the last 12 months and no major compliance issues were found. An audit is being conducted to verify continued compliance and a copy of the previous results is being submitted with this request.

I have read and understand Jenkins Enterprises Social Compliance Manual including the Workplace Code of Conduct, Expectations of Factories and the Audit Process.

Signed: _____ Date: _____

Note to Auditing Company: All audits are to be conducted to the Jenkins Code of Conduct & FLA Monitoring Benchmarks unless otherwise specified above (in which case please contact us to confirm that audit scope requested conforms to Jenkins requirements). When the audit is completed, please submit a copy of the report to: 1) the factory, and 2) Jenkins and company paying for the audit (specified above).

5.2 Appendix B: Code of Conduct with Benchmarks

Forced Labor *

There shall not be any use of forced labor, including prison labor, indentured labor, bonded labor or other forms of forced labor.

- The Employer shall not use prison labor or contract work to prisons, in any form, including but not limited to material, goods and services.
- The Employer must not use any kind of debt-bonded or indentured workers nor permit or encourage workers to incur debt through recruitment fees, fines, or other means.
- Caution must be exercised in providing advances or loans to workers; the Employer must make sure workers can repay any advances or loans in a reasonable amount of time.
- Written contracts of employment shall be provided to all workers, including any migrant or non-local workers in a language they understand, clearly indicating their rights and responsibilities with regard to wages, working hours and other working and employment conditions. If a worker is illiterate, the Employer shall communicate the terms of the contract orally and confirm that the employee understands the terms.
- The Employer shall not make any monetary deduction because of disciplinary actions.
- The Employer shall not require monetary deposits for accommodation or Personal Protective Equipment, uniforms, tools, etc.
- The Employer shall not require workers to give written consent for wage deduction for items that are not mandated by law or collective bargaining agreement.
- All terms of employment shall be voluntarily agreed upon by the employees.

Human Trafficking

- The Employer shall not engage in human trafficking, or any activities related to human trafficking including deploying trafficked persons to provide services of any form.
- The Employer must establish a recruitment policy and procedure that prevents trafficked victims from employment. Personnel responsible for hiring workers directly or through recruiting agencies must be trained for implementation of this policy.
- In the event the Employer discovers trafficked persons working within their facilities or their subcontractors it is the responsibility of the Employer to immediately redress the issue.
Note: Victim(s) of human trafficking may be suffering from extreme emotional or psychological trauma. Protecting the victim(s) from further emotional trauma and ensuring that their legal rights are protected is paramount; therefore, the redress of victims of human trafficking must be handled very carefully.

- The Employer shall create a Human Trafficking Remediation Plan prior to the discovery of such a serious human rights violation within their supply chain or at their facilities.

Freedom of Movement

- The Employer shall not restrict the movement of workers in their designated work areas and provide free access to drinking water and toilets. This applies for both the employment site and dormitories.
- Workers shall not be required to live in employer-owned or controlled housing.
- The Employer shall not keep non-local or migrant workers separated from general employee housing (i.e. in a recruitment area facility).
- The Employer provided living quarters shall have working payphones available for use by workers at any time. Workers shall be advised of easily accessible locations where prepaid phone cards can be purchased.
- Workers shall be permitted to come and go as they choose from their employer provided living quarters during non-work hours and their rights to move about shall not be unreasonably restricted.
- Workers shall be permitted to have visitors in the living quarters, subject only to reasonable rules established by the Employer regulating access during nighttime hours.
 - Workers shall not be compelled to make use of stores or services operated in connection with the Employer's operations.
- Where access to other stores or services is not possible, the Employer shall ensure that goods or services are sold or provided at fair and reasonable prices, without the aim of indebting or otherwise coercing the workers.

The Right to Resign

- All work must be voluntary, and workers shall have the freedom to terminate their employment.
- There shall not be penalties for paying back wages already earned, or withhold wages already earned, or in any way punish workers for terminating employment for any reason.
- The Employer shall adopt a separation policy and procedures written in the languages understood by workers and further ensure workers are informed of its provisions.

Foreign and Migrant Workers and Recruitment Agencies

- Foreign or migrant workers shall be provided with their employment contract prior to commencing work. The practice of contract substitution (the replacement of an original contract or any of its provisions with those that are less favorable) is strictly prohibited.
- The Employer shall not add “supplemental agreements” to contracts once migrant workers have arrived at the worksite.
- Workers shall not be charged any fees or costs for recruitment, directly or indirectly, in whole or in part, including costs associated with travel, processing official documents and work visas in both home and host countries. The Employer shall follow the principle of “employer pays” and accept the cost of recruitment as a business cost.
- The Employer shall provide all migrant workers job-related training as well as occupational health and safety training in the language they understand.
- The Employer shall not confiscate or force migrant workers to lodge, or “deposit,” original passports, identity papers, travel documents, or any other personal legal documents, or other valuable items, including cell phones upon commencing employment with the employer. The Employer may provide, at an employee’s written request, secure storage for employee documents, such storage shall be always freely accessible to workers.
- The Employer shall provide on-boarding training to migrant workers that include their legal rights and protections provided by the employer; the scope of national law on labor practices; mechanisms for workers feedback and communication including grievance mechanisms; discipline procedures, termination and repatriation and dormitory regulations.
- Migrant workers shall receive annual leave as stipulated in their original contract and must be in accordance with national and international law.
- The paid leave of migrant workers must not be less than what is provided to country nationals employed by the employer. Migrant workers must be free to return to their home country during paid leave, without penalty or threat of termination.
- The termination policy accorded to migrant workers shall be the same as that for country nationals.
- Upon completion of the contract, the Employer shall provide repatriation transportation. However, such obligation for repatriation does not apply if the foreign employee:
 - is terminated for breach of contract due to illegal conduct.
 - becomes employed by another employer within the country
 - leaves the employment voluntarily prior to the completion of the employment contract.
- The Employer must only use government registered or legally licensed recruitment agencies/labor brokers. Use of unregistered/unlicensed agencies is strictly prohibited.
- The Employer shall implement a pre-selection review (see Appendix C) of labor brokers to ensure that those selected operate in compliance with the law and to the highest standard of

ethics.

- Clear procedures and policies shall be in place for the management of all labor broker's working relationships.
- The Employer shall audit their labor brokers on a regular basis to ensure that recruitment and hiring has been performed legally and ethically and in accordance with stipulated terms of the employer/labor broker contract/agreement.
- The Employer shall ensure that labor brokers have a mechanism in place for recruited migrant workers to file grievances directly with the labor broker in addition to the worker grievance mechanisms the employer has in place.
- The management of workers by an on-site labor broker is prohibited.

Proof of Age*

No person shall be employed under the age of 15 or under the age for completion of compulsory education, whichever is higher.

- The Employer shall have a policy in place for the minimum age of employment; this policy should be conveyed to all workers at the time of their hiring.
- Every employee must be at least fifteen (15) years of age or meet the legal working age of the country, whichever is higher.
- Children under the local minimum age shall not be allowed in the production area at any time. If the Employer provides childcare facilities, they must not physically overlap with production areas, and children shall not have access to production areas unless they are part of a guided tour or other unusual event.
- The Employer shall establish a remediation policy and procedures for the remediation of children if they discover that underage workers are working at their facilities or their subcontractors' sites.

Age Verification

- The Employer shall maintain copies of official documentation for every worker that verifies the worker's date of birth.
- The Employer shall establish written procedures that can successfully identify applicants with falsified proof of age documents and use an effective age verification process when recruiting new employees. For example, referencing examples/samples of government issued ID cards used to compare with the ID cards presented by workers.
- In countries where independent documents (birth certificates or government issued IDs) are not available or can be easily forged The Employer shall use reasonable independent means for determining workers' age.

Juvenile Workers

- Juvenile workers are defined as workers between the legal working age or fourteen (14) years old whichever is higher and eighteen (18) years old or higher as stipulated by the local law.
- All companies employing juvenile workers shall follow all applicable laws and regulations concerning juvenile workers and shall establish a policy and procedure for the employment of juvenile workers including documented proof of age and registration, requirements for regular medical checkups, age appropriate type of work, and legal restrictions around work hours and work areas.
- If according to provincial and national laws juvenile workers are allowed to work overtime, the Employer shall ensure that the overtime hours worked by juvenile workers do not exceed the legal limit (overtime hours juvenile workers are permitted to work).
- No person under the age of eighteen (18) years old shall work at night as defined by the ILO (past 10:00pm) or undertake hazardous work as defined by the ILO and restricted by the local laws and regulations. For example, work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety, or morale of persons under the age of eighteen (18) years old.
- The Employer shall have a system for identifying workstations and operations that are inappropriate for juvenile workers according to the ILO and applicable laws.
- The Employer shall comply with all regulations and requirements of apprentice or vocational education programs and shall be able to document that these are legally recognized programs. Informal arrangements of any kind are not acceptable.
- Where the law requires government permits or permission from parents as a condition of juveniles' employment the Employer shall abide by all rules and procedures and shall keep all relevant documentation on-site for inspection.

Harassment or Abuse *

Every employee shall be treated with respect and dignity. No employee shall be subject to any physical, sexual, psychological, or verbal harassment or abuse.

- The Employer shall establish a written policy prohibiting harassment and abuse in the workplace that includes disciplinary actions against the perpetrating workers up to and including termination of employment.
- The Employer shall establish procedures for workers to report harassment or abusive behaviors in good faith and without fear of retaliation.
- The Employer shall train all workers on harassment/abuse policy and procedures.
- Security practices shall be gender-appropriate and non-intrusive.

Grievances

- The Employer shall have a well-documented policy for filing, handling, and resolving grievances in the workplace. The employer is responsible for ensuring these policies are clearly understood by management and supervisor level personnel to ensure appropriate implementation throughout the factory.
- The grievance mechanism must be presented, in clear terms, to all new workers.
- The grievance policy shall provide multiple channels for workers to raise concerns and suggestions confidentially or anonymously without fear of retaliation.
- All grievances should be investigated, documented and the decision for solutions shall be communicated back to the employees.

Nondiscrimination

No person shall be subject to any discrimination in employment, including hiring, salary, benefits, advancement, discipline, termination, or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, or social or ethnic origin.

- The Employer shall enact written policies against discrimination in accordance with the laws of the country.
- All employment decisions including but not limited to, hiring, job assignment, wages, bonuses, allowances, and other forms of compensation, promotion, discipline, assignment of work, termination of employment, and provision of retirement, shall be made solely based on education, training, and demonstrated skills or abilities.
- The Employer must not discriminate on the grounds of gender, age, religion, race, caste, social or ethnic origin, nationality, sexual orientation, marital status, familial status, pregnancy, disability, disease, political opinion/affiliation, or union affiliation.
- Workers may not be prohibited from attending church or practicing their religions, from dating or engaging in other personal or social activities, from becoming pregnant, or from exercising any other legally protected rights or liberties.
- During recruitment, applicants shall not be tested for medical conditions not required by law or product safety, or quality requirements. (e.g., eye exams for color blindness)

Women's Rights

- The Employer shall not threaten female workers with dismissal or any other employment decision that negatively affects their employment status to prevent them from getting married or becoming pregnant.
- The Employer shall not, based on a woman's pregnancy, make any employment decisions that negatively affect a pregnant woman's employment status, including, loss of seniority, or

deduction of wages.

- The Employer shall not dismiss workers when they become pregnant except in specified circumstances permitted by law
- The Employer shall not use pregnancy tests as a condition of hiring or of continued employment except where required by law.
- The Employer shall not force or pressure female workers to use contraception as a condition of hiring or of continued employment.
- The Employer shall abide by all protective provisions in local laws and regulations benefiting pregnant workers and new mothers, this includes provisions concerning maternity leave and benefits, prohibitions regarding night work, temporary reassignments away from work stations and work environments that may pose a risk to the health of pregnant women and their unborn children or new mothers and their new born children, temporary adjustment of working hours during and after pregnancy, and the provision of breast-feeding breaks and facilities.
- Where legal protective provisions for pregnant or new mothers are lacking, The Employer shall take reasonable measures to ensure the safety and health of pregnant women and their unborn children. Such measures shall be taken, such as those listed above, that shall not unreasonably affect the employment status, including wages and benefits, of pregnant women.

Health and Safety *

Employers shall provide a safe and healthy workplace setting to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or because of the operation of employers' facilities. Employers shall adopt responsible measures to mitigate negative impacts that the workplace has on the environment.

Training and Education

- The Employer shall operate in full compliance with all applicable laws and regulations with respect to occupational health, safety, and environmental practices in all aspects of their operations.
- The Employer shall maintain and keep up-to-date, relevant health, safety and environmental permits as required by applicable laws and regulations.
- The Employer should have at least one qualified occupational health and safety expert, by education and experience, at the factory and dormitory/residential facility in charge of and leading the Employee Health and Safety Committee.
- Any health or safety issue concern raised should be actively followed up by a team led by the Employee Health and Safety Committee.
- General health and safety training shall be conducted for all new workers, including administrative workers, to raise their awareness of the hazards and risks of their work

environment. Training records should be kept and properly maintained.

- The Employer shall provide all workers routinely exposed to health and safety hazards with the relevant training in the safe use of machinery, equipment and the use and care of Personal Protective Equipment (PPE), whether required by law or not. Training records should be kept and properly maintained.

Factory – General

- The factory must be structurally sound for both production and dormitories buildings. The Employer must maintain a valid building and construction license/ certificate/re-certification for the employer's premises, as required by applicable law and regulations.
- Warehouse and production areas must be separated from dormitories/residential facilities.
- The Employer shall provide adequate and appropriate childcare facilities, if required by law.
- Grounds and facilities shall be cleared of rubbish daily for both production and dormitories buildings.
- Heat generating machinery: boilers, furnaces, compressors, etc. shall be kept clear of trash and other potential flammable materials.
- The Employer shall have a regular maintenance schedule for machinery and keep relevant records of such.
- Materials shall be stacked at a safe height and be stable to prevent falling.
- Handrails should be mounted on at least one side of all stairs with four (4) or more steps for both production and dormitories buildings.
- Guards should be installed on stair landings or any open side(s) of stairs for both production and dormitories buildings.
- Elevators shall be inspected at least yearly and serviced by qualified licensed personnel. Inspection documents shall be maintained in the employer's office or in the elevator.
- Lighting shall be adequate for working safely. It shall be centered over production lines and not produce glare or shine directly into workers' eyes.
- Stairwells must be well lit for both production and dormitories buildings.
- Surrounding grounds shall be well lit if night work is done or if on-site housing (dormitories) are utilized.
- Exhaust fans shall be cleaned daily, if needed, from accumulated dust and debris.

- There shall be appropriate ventilation in all areas especially those where workers engage in strenuous activity such as the continuous lifting of heavy objects and/or where heat is generated.
- Workers shall be dressed safely for the job (i.e., no loose-fitting clothing or jewelry that could get caught in machinery).
- All the machinery shall have operational safety devices (safeguards systems that eliminate the possibility of the operator or another worker placing parts of their bodies near hazardous moving part).
 - There shall be shield guards on grinding and buffing machines.
 - There shall be needle guards and pulley guards on sewing machines.
 - There shall be knife guards on cutting machines.
 - There shall be blade guards on portable cutting machines and table saws.
 - Machines shall have emergency shut-off switches within reach of the operator.
- The Employer shall have a regular maintenance schedule for machinery and keep relevant records of such.
- The employer shall supply PPE at no cost or deposit to the workers up front.
- Workers that are routinely subjected to noise at more than 80 decibels (to be used as a guideline) must be provided with earplugs.
- Electric cords shall be grounded, in good condition, continuous in length without splices or taped repairs and appropriate to the type of machinery it is powering for both production and dormitories buildings.
- The Employer shall ensure suitable control measures are in place to prevent employee exposure to electrical shock according to law for both production and dormitories buildings. For example: Grounding to prevent buildup of static electricity, suitable insulation for the voltage used and the conditions, effective guarding to prevent contact with live and exposed parts of electrical equipment, and circuit protection devices to limit or stop the flow of current such as: fuses, circuit breakers, GFCIs (ground fault circuit interrupters).
- All electrical distribution panels, breakers, switches, and junction boxes should be labeled with appropriate signage, completely enclosed and protected from wet conditions for both production and dormitories buildings.
- Appropriate signs in applicable languages should be posted at entrances and guarded locations to alert persons to potential hazards. For example: “Danger High Voltage,” or “Warning Hazardous Chemicals”.
- Only licensed/certified and authorized workers should be allowed to operate powered motor vehicles.
- Operators of powered motor vehicles should undergo safety training and re-training at least annually.

- The Employer should provide workers with the necessary equipment and tools to allow work to be conducted in an ergonomically safe manner with increased satisfaction amongst workers.
- The Employer shall measure noise levels and shall ensure all parts of the operation and in the construction areas, if any, are in compliance with applicable laws and regulations.
- The Employer should ensure all risk factors for heat stress are controlled for both production and dormitories buildings, i.e., high temperature and humidity, direct sun exposure, no breeze or wind, low liquid intake, lack of exposure to hot workplaces.

Fire Extinguishers

- Workers shall receive training on the proper use of a fire extinguisher and operating instructions shall be placed in languages spoken at the factory, near the extinguishers.
- There shall be the legally required number of fire extinguishers available for both production and dormitories buildings. Recommended: one for every twenty-five (25) workers.
- Fire extinguishers shall be easily accessible, mounted to walls and/or columns and clearly marked for both production and dormitories buildings. In large open factory floors, extinguishers shall be placed in the work area, not just along the walls or at exits.
- Fire equipment shall be serviced and/or inspected according to local law and at least every six months with related records kept for both production and dormitories buildings. The internal pressure of fire extinguishers shall be properly maintained.
- Fire extinguishers shall be appropriate to the types of potential fires in the various areas both production and dormitories buildings and labeled according to the types of fire they are to be used for:
 - Class A - Ordinary combustible fires (e.g., textiles, cartons)
 - Class B - Flammable liquid, gases, or grease fires (e.g., canteen, kitchen)
 - Class C - Electrical equipment fires (e.g., machinery, circuit boards)

Fire Alarms

- Fire alarms shall be audible throughout all sections of both production and dormitories buildings and should be used for fire and evacuation only. The fire alarm shall be distinctive from any other alarm (i.e., lunch bell).
- The employer's fire alarm system shall be able to be activated from the production floor by means of a pull box or push button for both production and dormitories buildings. Workers shall know the location and purpose of the alarm button.
- In areas where workers shall be using hearing protection the factory must add visual or personal notification procedures (e.g., flashing strobe lights) to supplement the audible alarm.

Emergency Preparedness

- At least one (1) fire evacuation drill every six (6) months should be conducted at the workplace and dormitories, or more frequently where required by law. Time to complete the evacuation, attendance and missing persons must be reported following the drill. Records of the fire drill should be properly maintained.
- Emergency drills for other potential emergency scenarios should be conducted at least once a year (e.g., flood, hurricane, and earthquake) for both production and dormitories buildings.
- The emergency exit routes shall be posted, in clear view and written in the native language, in case of fire or other emergencies for both production and dormitories buildings.
- Emergency lighting shall be installed in the halls, stairwells and above each exit for both production and dormitories buildings.
- Workers shall have access to two separate emergency exits for both production and dormitories buildings. A building with more than 500 workers shall have at least three exits, and a building with more than 1000 workers shall have at least four exits.
- Doors and corridors that could be mistaken for emergency exits shall be marked - for example: "Not an Exit" for both production and dormitories buildings.
- The employer shall indicate with a "yellow box" or other marking the areas in front of emergency exits, fire equipment, control panels & evacuation routes that are to be always kept clear for both production and dormitories buildings.
- The doors and other exits shall be kept accessible and unlocked during all working hours.
- Corridors leading to exits shall be clearly marked and, at least, approximately 3 feet (1 meter) wide for both production and dormitories buildings.
- The emergency exit signs shall be marked with signs that are visible at least 100 feet (30 meters); lettering of signs shall be 7 inches (18 cm) high for both production and dormitories buildings.
- All the main exit doors shall open to the outside or exterior stairwell for both production and dormitories buildings.
- Aisle space between each workstation shall allow for free body movement and adequate room for emergency evacuation. The aisles, exits and stairwells shall be always kept clear of obstruction during working hours for safe and rapid evacuation.
- All doors shall be at least "two people" wide and open outwards, other than sliding doors for both production and dormitories buildings.
- Directions diagram for a safe evacuation route shall be posted in the native language in all the sleeping quarters in case of fire or other emergency. Diagram shall have a "You Are Here" label for reference for both production and dormitories buildings.

Sanitation

- There shall be a sufficient number of toilets consistent with local law per floor & shall be separated by gender for both production and dormitories buildings. Recommended:

Workers	Toilets	Workers	Toilets
1 -15	1	56 – 80	4
16 -35	2	81 – 110	5
36 - 55	3	111 – 150	6

For each additional 40 workers above 150, add 1 additional toilet.
This applies for both males and females.

- The toilets shall be separated by gender and must have appropriate privacy. If toilets for both genders are next to each other they must be separated by a solid wall that extends from the floor to ceiling. Toilet stalls shall have doors with locking mechanisms for both production and dormitories buildings.
- The toilets shall be accessible to workers throughout the course of the day without restrictions.
- Workers shall have access to clean water for washing within nearby proximity to toilets along with towels for drying their hands for both production and dormitories buildings.
- Toilets shall be stocked with toilet paper for Western toilets or clean running water for non-Western or squat toilets for both production and dormitories buildings.
- Urinals in male toilet facilities shall have an adequate water flush system and a drain for both production and dormitories buildings.
- The toilet areas shall be well lighted and ventilated: window open directly to the outside and/or exhaust fan leads to outside for both production and dormitories buildings.
- The employer shall maintain clean, safe and sanitary toilet areas; toilets shall be cleaned daily for both production and dormitories buildings.

First Aid

- The employer shall have written emergency procedures for serious injuries that cannot be treated by factory staff or by factory medical personnel. These procedures shall include responsibilities for “who takes whom, where, when, and how.”
- Supervisors in all production areas shall be trained in emergency medical procedures. Emergency telephone numbers shall be posted in a visible, accessible location.
- At least one person on each shift shall be trained in first aid.
- One stocked first aid kit shall be made available for each production and dormitory floor. For every additional 100 workers 1 more first aid kit will be added. At a minimum First Aid kits should contain items listed below:

Adhesive bandages	Cotton balls
Flexible fabric bandages	Adhesive tape
Instant cold packs	Antiseptic wipes
Ammonia inhalants	Disposable gloves
Eye wash	Burn cream

Blood Borne Pathogens

- The Employer should ensure an effective blood borne pathogen procedure is developed and implemented at the facility.
- If the employer operates a medical clinic that gives injections, proper procedures for needle disposal shall be used and followed.
- Broken medical needles should be recorded, collected, and placed in appropriate containers.
- All medical service personnel and first aid responders should be adequately protected from exposure to blood borne pathogens. Training should be provided to all workers in this procedure.

Accident/Injury Investigation

- The employer shall maintain a list of all work-related injuries and illnesses that are treated by the employer, including minor events such as small cuts. The list shall include the names of the people treated, their jobs, and what activity they were doing at the time of the injury or illness.
- If the employer has a clinic, clinic staff shall maintain a list of all illnesses and injuries that are treated as well as medication given, if any.
- The Employer should set up a policy and procedure for the investigation of accidents and injuries and identification of the root cause(s).
- Corrective/preventive actions and person(s) responsible for implementation should be identified and followed through to prevent recurrence of the incident.

Food Safety and Hygiene

- Sufficient clean and safe drinking water should be provided at the workplace and dormitories. If ground water is used as drinking water, The Employer should test the water at least quarterly to ensure bacteria and disinfection acceptance levels meet legal drinking water requirements.
- The Employer shall obtain the relevant food safety and hygiene certificate for their canteen and kitchen facilities according to law.

- Food preparers should undergo medical examination and be certified as free from communicable diseases at least annually and before hiring date.
- The Employer should post all the required certificates prominently and in an appropriate location.
- Food preparation shall be separate from the work and sleeping areas.
- Food should be stored in a sheltered, clean, and dry environment with doors/cabinets that can be closed firmly to prevent pests such as rodents from entering. Secondary food storage containers such as jars, bins and crates should be provided where necessary (e.g., for food where the original seal has been opened or broken).
- Eating facilities shall be protected from the elements and adequate seating/tables and lighting shall be provided.
- The food preparation area shall have a refrigeration unit and/or freezer for food requiring storage in cold temperatures, potable water, and fire extinguishers appropriate to extinguish electrical and grease fires.
- The food preparation and dining areas shall be kept clean and disinfected regularly.

Chemical Safety

- The Employer shall purchase all toxic and corrosive chemicals from company holding the relevant legal license and permits for the sale and supply of such chemicals.
- The Employer shall be in compliance with chemicals prohibited and/or restricted from use by law.
- Workers shall receive training, appropriate to their job responsibilities, in the safe use of chemicals or other hazardous materials and training at least annually and prior to placement in roles where they are expected to handle or use chemicals.
- No chemical should be allowed on site without a Material Safety Data Sheet (MSDS). The MSDS must be in the language that workers working with such chemicals understand and must be available in all areas where chemicals are used and stored.
- Chemicals should be stored in a designated locked area, which is well ventilated, spark proof, equipped with sufficient fire-fighting equipment, away from direct sunlight and heat, ignition sources, electrostatic discharge proof, pressure relief valves, and protected from leaks.
- Incompatible chemicals should be segregated.
- All chemical containers, bottles, drums etc., should be clearly labeled with appropriate chemical labeling including:
 - the common name of the chemical.

- the name, address, and emergency phone number of the company responsible for the product.
 - an appropriate hazard warning and in applicable languages, e.g., “Danger,” “Warning,” “Corrosive.”
 - First aid instruction.
- Proper and accurate warning signage (‘No Smoking’, ‘Restricted Access, etc.) should be displayed prominently at chemical use locations and where chemicals are stored.
 - The Employer should monitor chemical inventory levels and expiry dates monthly. Records should be properly maintained.
 - Explosion-proof equipment and lighting should be used in areas where flammable or combustible materials are stored.
 - Primary and/or secondary spill containment should be installed in areas where chemicals are stored and used. The spill containment area and methods used should be sufficient to hold 110% of the volume of the largest container stored and used at the employer’s premises. Chemicals shall be kept contained in a well-ventilated area.
 - Aboveground tanks shall be labeled to indicate contents.
 - Spill control kits should be available, adequate, and properly maintained.
 - Spill response teams should be established, and these teams should be trained in emergency chemical spill response handling and disposal at least annually.

Dormitories

- The Employer shall comply with all legal regulations regarding residential facilities.
- Workers shall not be required to live in employer-owned or controlled housing.
- If a legal monetary deduction is made for housing, the cost must be reasonable.
- The Employer shall not segregate non-local or migrant workers from local workers.
- Workers shall be permitted to come and go as they choose from The Employer provided living quarters during non-work hours and their rights to move about shall not be unreasonably restricted.
- Workers shall be permitted to have visitors in the living quarters, subject only to reasonable rules established by the employer.
- A designated cooking/kitchen area shall be provided.
- Potable water and/or facilities to boil water shall be available to dormitory residents.

- Dormitories shall not be located above any production or warehouse buildings.
- Residents shall be provided with their own mats or beds and shall not be required to share mats with other residents.
- There shall be enough room for residents to move between the mats or beds and enough room for residents to exit safely in case of emergency.
- The sleeping quarters of non-family areas shall be segregated by sex.
- Adequate showering facilities must be provided.
- Separate wash basins must be available for laundry.
- Smoking must be restricted to designated areas outside of dormitory rooms.

Freedom of Association and Collective Bargaining

Employers shall recognize and respect the right of employees to freedom of association and collective bargaining.

- Vendors shall allow workers to form or join organizations of their own choosing in accordance with legal provisions of the country.
- In countries where freedom of association is prohibited, decided by the State, or limited (i.e. free trade zones), employers shall facilitate all parallel means of freely-elected representation, such as allowing workers to gather, elect representatives, and negotiate collectively without reprisal.
- Vendors shall not dismiss, discipline, coerce or threaten workers seeking to exercise their legal right of association, which includes the right to join, or not to join, trade unions or other worker organizations/associations.
- All workers, including migrant or non-local workers, shall be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation, or harassment, between themselves and the management.
- Any joint workers or management committees in the workplace shall be comprised of a cross-section of the workforce, including migrant workers, workers of different gender, and workers from different departments.
- Collective agreements shall be confirmed in writing, and the provisions shall not violate local or national laws and regulations.
- Vendors shall not unlawfully restrict union/committee notices from being posted publicly on notice boards.

Compensation*

Every worker has a right to compensation for a regular work week that is sufficient to meet a worker's basic needs and provide some discretionary income. Employers shall pay at least the minimum wage or the appropriate prevailing wage, whichever is higher, comply with all legal requirements on wages, and provide any fringe benefits required by law or contract. Where compensation does not meet workers basic needs and provides some discretionary income, each employer shall work with the FLA to take appropriate actions that seek to progressively realize a level of compensation that does.

Policy and Communication

- The Employer shall establish a written policy on wages and benefits according to the law.
- The employer shall communicate, orally and in writing, to all workers in the language of the worker: the wages, incentive systems, benefits, and bonuses to which all workers are entitled in that facility and under the applicable law.
- Deception in wage commitments, payment, advances, and loans are prohibited.
- The Employer shall ascertain that the workers understand key information such as how wages are calculated, overtime rate, pay periods and benefits.

Regular and Overtime Wages

- Workers shall be paid for all hours worked and shall record their own hours (e.g., "punch" or swipe their timecards).
- The Employer shall set regular wages in compliance with all applicable laws, rules, and regulations.
- All workers, including full-time, part-time, juvenile workers, temporary, contract workers, shall be paid at least the minimum legal wage for a normal working week, or a wage that meets local industry standards for compensation, or collective bargaining agreement, whichever is higher.
- Where training wages are legally allowed for trainees or apprentices, no worker shall be paid a training wage for more than three months cumulatively.
- Where workers are paid at a piece rate, the payment for normal & overtime work performed shall meet at least the legal or the local industry standards for compensation, whichever is higher.
- The Employer shall ensure that wages paid for all overtime work hours meet at least the legal or the local industry minimum standards for premium rates of compensation.
- If no legal or industry standard exists, then overtime piece rate wage shall be paid at a rate that is higher than the piece rate wage paid for regular hours.

Pay Slips

- For each pay period, the Employer shall provide workers an understandable wage statement which includes:
 - days worked

- wage or piece rate earned per day
 - hours of overtime at each specified rate
 - bonuses and allowances
 - legal or contractual deductions
- All hourly wages, piecework, bonuses, and other incentives shall be calculated and recorded accurately, and shall be acknowledged by the employee as accurate.
 - The Employer shall not use hidden or multiple payroll records in order to hide overtime, to falsely demonstrate hourly wages, or for any other fraudulent reason.

Deduction from Wages

- The Employer shall not unlawfully charge workers for tools to perform their job responsibilities.
- The Employer shall not unlawfully deduct from workers' wages fees such as work visas, permits, and/or health/medical examinations and other charges incurred for employment eligibility.
- Union dues shall not be deducted from the workers' wages without written consent from the workers or when it is specified in a collective bargaining agreement.
- Deductions must not be used as a disciplinary measure, or to keep workers tied to their jobs.
- The only deductions from the employee's wages shall be those that are legally allowed and have the written consent of the employee.

Payment of Wages

- Wages must be paid regularly, within thirty (30) days.
- The Employer shall pay compensation directly to workers in cash or directly credited into the workers bank account (an account opened in the workers name), as required by applicable law.
- Wages must not be paid indirectly through hiring agents or brokers or through any third parties, except when there is an express notification from the appropriate legal authority to do so.
- Wages shall be paid in legal tender. "In-kind" (vouchers or coupons) payments, where allowed by law, shall only be a small portion of workers' wages to not limit workers access to cash.
- The Employer shall determine and pay all statutory severance and other legal separation benefits within 48 hours of termination of employment.

Social Benefits

- The Employer shall provide all legally mandated social benefits such as social security, medical, occupational illness/injury protection, retirement benefits, and additional benefits stipulated in collective bargaining agreements.

- The Employer shall ensure that legally mandated benefits pertaining to holiday and annual leaves are provided for all eligible workers.
- Workers shall be paid for public holidays and annual leave as required by applicable law or collective bargaining agreements.
- Pregnant workers shall be provided with legally mandated benefits and leaves.
- No unlawful examinations may be conducted to verify eligibility for menstrual leave if it is a benefit stipulated in local laws.

Employment Contracts

- The Employer shall not fire and re-hire workers or keep them on temporary or agency contracts in order to avoid providing them with employment rights under the relevant national law.
- The Employer shall provide workers and contract workers as required by law with written information such as the collective bargaining agreement or written contracts about their employment terms and conditions in the language the employee understands.
- The terms of employment contracts shall be the same for all workers, migrant workers, and country nationals.

Documentation

- Time worked by all workers, regardless of compensation system, shall be documented by timecards or other accurate and reliable recording systems such as electronic swipe cards. The Employer shall maintain such documents on file for a minimum of twelve (12) months.
- The Employer shall maintain appropriate signed and confirmed payroll registers and other records indicating pay periods, gross wages, deductions, net wages, working days, leave and regular and overtime hours, bonus, authorized loan payments and allowances paid.
- The Employer must maintain all financial records for the payment of legally required premiums and withholdings such as social security, unemployment, retirement, severance, or provident funds.

Hours of Work*

Employers shall not require workers to work more than the regular and overtime hours allowed by the law of the country where workers are employed. (Comment: Currently, industry the industry norm is to note that “employers shall not require more than a sixty (60) hour work week on a regularly scheduled basis”). Employers shall allow workers at least 24 consecutive hours of rest in every seven-day period. All overtime shall be consensual.

Hours of Work

- The Employer shall ensure all local laws that pertain to hours of work are followed. Furthermore, overtime work hours plus regular work hours in a seven (7) day period shall not exceed sixty (60) hours total per employee.
- No workday shall exceed twelve (12) hours (combined regular & overtime hours).

Overtime Work

- Workers shall not be forced directly or indirectly to work overtime hours with or without pay.
- If a Factory must consistently obtain waivers from the local government to perform excessive overtime or if overtime hours are found to extend beyond legal limits, the Factory must demonstrate a commitment to reduce excessive overtime hours by using better production planning to reduce the need for excessive overtime.
- The Employer shall use positive incentive arrangements to induce overtime (within the legally allowed limits) and shall ensure such incentives are known by workers.
- The Employer shall demonstrate an effort to maintain a level of staffing that is reasonable in view of predictable or continuing fluctuations in business demand so as to not be overly reliant on overtime hours.
- Allowable "Peak Period" hours shall be according to the law.
- Workers who work the legally prescribed workday in one factory shall not be transferred to another section in that factory, or to another factory, to work a second shift at regular pay.

Time Keeping System

- The Employer must maintain an effective time-keeping system that accurately records daily working hours of all hourly and piece rate workers.
- Each employee shall record their own beginning and ending times.
- Both regular and overtime hours must be recorded in the same system and reflect the actual hours worked.
- The Employer shall maintain the working hours record for the period required by law or the most recent twelve (12) months, whichever is higher.

Rest Days and Breaks

- Workers shall be given at least one (1) rest day in any seven (7) day period; one full rest day upon six (6) consecutive days of work.

- The Employer shall provide workers break(s) during work shifts as required by local law, or the collective bargaining agreements.

Annual, Holiday and Sick Leave

- Workers shall be provided with annual leave and holidays as required by law or which meets the local industry standard, whichever is greater.
- The Employer shall not impose any undue restrictions on workers' use of their available annual leave.
- Any factory restrictions or procedures applicable to taking annual leave, such as requiring a minimum period of service before being allowed to use annual leave, written requests to be submitted within a certain time before the annual leave would be taken, etc., must be in line with local laws, regulations and procedures and must be communicated in full to all workers.
- The Employer shall not impose any sanction on workers for requesting or taking any type of leave, such as annual, sick, maternity, or other leave, in line with all applicable rules and procedures.
- The Employer shall provide workers with sick leave as required under local laws, regulations, and procedures.
- The Employer shall not impose any undue restrictions on sick leave. Any factory restrictions or procedures regarding sick leave, such as informing the employer as soon as possible, the provision of medical certificates, the use of designated doctors or hospitals, etc., must be in line with local laws, regulations and procedures and must be communicated in full to all workers.
- Absences from work for reasons beyond the control of workers, such as sick leave or periods during which factory operations are suspended, shall not be counted as annual leave nor shall they be deducted from calculations concerning length of service, unless specified differently under local laws, regulations, and procedures.

Subcontracting

Employers conducting any outsourced, subcontracted work or subassembly shall notify Jenkins Enterprises prior to engaging in such work. If subcontracted work is done at another location and Jenkins Enterprises has been notified of the location, the Employer that was issued the original production request shall be responsible for assuring that the subcontractor is in compliance with Jenkins Enterprises Code of Conduct.

Documentation and Policies

- The Employer shall maintain appropriate records of suppliers and subcontractors (and where appropriate, sub-suppliers). Such records shall be kept for at least 12 months.
- The Employer must confirm that subcontractors including sub-assembly contractors will comply with the appropriate compliance standards.

- The Employer shall not permit homework of any kind.
- The Employer must adopt the policy including consequences of violations and train all workers and establish a routine internal monitoring to ensure no unauthorized subcontracting or home working is taking place.

Environment

Employers shall comply with all environmental laws, regulations, and standards applicable to their industry, and shall have written environmental policies to lessen their negative impact on the environment.

Laws and Regulations

- The Employer shall adhere to all applicable environmental laws and regulations.
- The Employer shall maintain and keep up to date, all relevant environmental permits as required by applicable laws and regulations.
- The Employer should appoint at least one member of the management team, who is to be responsible for the Environmental Management System (EMS) of the facility. The employer should provide individual(s) with the necessary training to allow them to perform their role effectively.

Pollution Control - General

- The Employer shall ensure appropriate pollution controls are installed to reduce environmental impacts resulting from their operations according to law. For example: engineering controls such as a scrubber system to reduce air emissions and administrative controls such as waste management procedures.
- The Employer will recycle whenever possible.
- The Employer shall not undertake illegal on-site burning of waste or uncontrolled land filling.
- Air emissions shall comply with legal requirements.
- The quantity of air emissions shall be tracked, monitored, and in compliance with the facility's discharge permit.
- The emissions discharge permit shall be renewed annually or as often as required by law.
- Wastewater discharge shall comply with legal requirements including generation, handling, transfer, treatment, disposal, and reuse.
- The Employer should make sure its staff understands and strictly follows procedure for testing discharge and is undertaken at the appropriate point.

Hazardous Waste

- All Chemical residue and hazardous waste shall be stored and disposed of in accordance to applicable laws.
- The Employer shall obtain appropriate and up-to-date permits for all waste disposal and discharge.
- Hazardous waste (such as soiled rags, used filters, etc.) should be collected in designated locations, separate from general waste, and clearly labeled.
- Waste storage area should be equipped with appropriate emergency response facilities/equipment
- No substances or toxic chemicals banned by regulations (such as asbestos, PCBs, PBBs, DDT, etc.) shall be used.