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**INNOVATION LINE**  
EVT-US-4IMP-173500

**FACILITY INFORMATION**

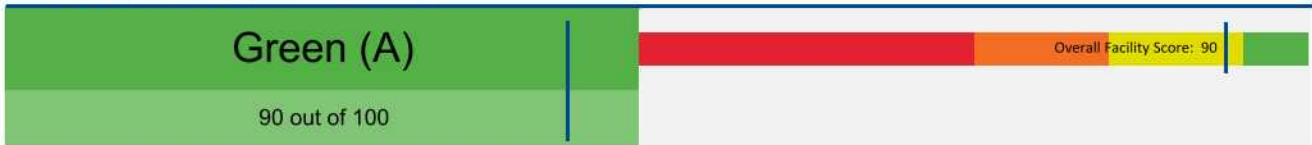
Report #:	EVT-US-4IMP-173500	City:	Los Angeles
Assessment Date:	August 16, 2021 - August 18, 2021	Country:	United States of America
Last Assessment:	N/A	Assessors:	Sebastian Fregoso, Yunuen Vazquez (S)
Assessment Type:	ERSA Remote	Service Provider:	ELEVATE
Schedule Type:	Announced		

**ASSESSMENT SCOPE AND COVERAGE**

It is not designed to cover all areas of an onsite social assessments. Some areas are out of the scope of this remote assessment, whereas others are covered

Out of Scope	Subcontracting, Homework
Limited Coverage	Transparency & Business Integrity, Forced Labor, Harassment & Abuse, Freedom of Association & Grievance, Young Workers & Child Labor, Discrimination, Foreign Migrant Workers, Environment, Health and Safety
Decent Coverage	Management System, Hiring, Disciplinary & Termination Wages & Benefits, Hours of Work

**FACILITY SCORE AND BENCHMARKING**



Section	Total Findings	Critical	Major	Moderate	Minor
1. Transparency & Business Integrity	0	0	0	0	0
2. Management System	0	0	0	0	0
3. Hiring, Disciplinary & Termination	0	0	0	0	0
4. Young Worker & Child Labor	0	0	0	0	0
5. Forced Labor and Human Trafficking	0	0	0	0	0
6. Harassment & Abuse	0	0	0	0	0
7. Discrimination	0	0	0	0	0
8. Freedom of Association & Grievance	1	0	1	0	0
9. Foreign Migrant Labor	0	0	0	0	0
10. Wages & Benefits	0	0	0	0	0
11. Hours of Work	0	0	0	0	0
12. Health & Safety	1	0	1	0	0
13. Environment	0	0	0	0	0
14. Subcontracting	0	0	0	0	0
15. Homework	0	0	0	0	0

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## INNOVATION LINE

### EVT-US-4IMP-173500

#### CRITICAL / MAJOR FINDINGS

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Major: During the facility tour, it was noted that the facility does not count with a grievance mechanism such as suggestion boxes, latter on during the audit process it was confirmed with the Management Interview that there are no procedures nor mechanisms implemented to follow up with any confidential grievance such as a hotline, email or any kind of written procedure regarding this topic.

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Major: During the facility tour it was observed that in the site called Bethoven, the Chemical Storage Area is not properly equipped with fire extinguishers and the closer extinguisher was far from what the Local Law requires.

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#### BEST PRACTICES

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1.1. The facility has its own code of ethical business conduct. The code of ethical business conduct has been well communicated and implemented both internally and externally to its supplier chain.

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1.2. The facility provides regular trainings to managers and suppliers on code of ethical business conduct and shares best practices down their supply chain.

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1.3. The facility is open to assessor and willing to provide their records and discuss challenges with fully transparency.

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2.1. The facility establishes and implements a system to identify and assess potential risks (gaps in business processes) that could lead to noncompliance.

---

2.2. The facility establishes annual objectives, targets and improvement plans to improve their social compliance performance; periodic assessments and reviews are in place.

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2.3. There are appropriate written records (correspondence, reports, meeting minutes, etc.) of regular management review of social compliance systems.

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3.1. The facility adopts a progressive and incentive employee disciplinary system.

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3.2. The facility provides appropriate training to all employees on disciplinary policies and procedures; the trainings conducted are in a format that considers the different learning style, background, and education level of workers.

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4.1. The facility adopts ID reader or other intelligent ID checking system to verify workers' age at time of recruitment.

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5.1. The facility provides safe lockers for employees to store their personal identification documents and valuables.

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5.2. The facility has a written set of policy and procedures for its labour agents prohibiting of forced and compulsory labour.

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6.1 The facility provides appropriate training to management and workers on harassment and abuse.

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6.2 The security guards at the facility are not authorized to impose disciplinary actions against workers.

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7.1 The facility has developed and provides non-discrimination and cultural sensitivity education for all employees, addressing the importance of treating all people equally.

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7.2 The facility hires disabled people and makes the appropriate adjustment for access to, and around the facility.

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7.3 The facility organizes social actives or integration events that contribute to bringing unity among employees from different social classes or cultural backgrounds.

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8.1. The facility actively seeks ideas for improvement through regular communication system/suggestion boxes, and exit interviews.

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8.2. Regular employee satisfactory surveys are performed to measure employee morale and identify improvement opportunities at the facility.

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8.3. Both formal and informal feedback meetings are held regularly between managements and workers to discuss issues and ask suggestions for improvements.

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8.4. The management of the facility ensures that contract workers are represented on worker committees.

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9.1. The facility hires foreign migrant workers directly without the use of labour agency.

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9.3. The management of the facility meets regularly with its labour providers or agencies to work collaboratively to improve the quality of service to workers.

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9.4. The facility has assigned onsite coordinator or management staff who is fluent in the language of foreign migrant workers for better communicating and managing foreign migrant worker disciplinary and complaint.

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9.5. The facility works with other labour agents in their region to share information on agencies and labour providers.

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10.1. The facility has a system in place to progressively improve the wages of workers; e.g. productivity improvement initiatives that enhance workers' efficiencies, and applying the savings towards wages and worker incentives.

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11.1. The facility has a system in place to reduce the number of overtime needed; e.g. improving workers skills through training; mentoring and coaching so that mistakes and reworks does not lead to overtime; managing production flows to avoid delays.

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11.2. The facility pays overtime premiums above legal minimum requirements.

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11.3. The facility provides additional breaks to workers within shift, which extend beyond minimum legal requirements.

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11.4. The facility conducts regular internal assessments to ensure that time attendance system is being used properly and all working hours are accurately recorded.

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12.1. There is a health and safety committee or a procedure in place to hold periodic dialogues between management and employees to address and improve health and safety concerns.

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12.2. Training for Health and Safety at the facility is engaging and interactive - for example, the facility engages experts or the local fire service to demonstrate how to use fire extinguishers.

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12.3. The facility has adopted a holistic approach to health and safety issues, and the scope of training goes beyond that required by standards and local laws to include issues such as well-being and nutrition.

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12.5. The facility has documentary proof of its use of alternative non-toxic materials to reduce the use of hazardous materials.

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12.7. The facility offers multiple brands/types of PPE based on work requirements, and to ensure that the use of PPE is comfortable and easy to use.

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13.1. The facility conducts regular energy assessments to identify potential energy and cost savings and has an action plan for achieving energy reduction.

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13.2. The facility reuses materials when possible, and recycles materials that are able to be recycled, and they have an action plan for achieving waste generation reduction.

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13.3. The facility has developed and implemented measures to reduce water consumption.

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13.5. The site has an internal competition between teams to reduce waste.

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14.1. The facility shares best practices with its suppliers and other subcontractors and collaborates with them to achieve their standards.

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## GENERAL AUDIT OVERVIEW

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This announced ERSA Remote assessment started at 9:00 on August 16th, 2021 and ended at 17:00 on August 18th, 2021. One ELEVATE field staff (1 male) was assigned to verify the overall compliance status of the factory against the ELEVATE Responsible Sourcing Standards, as well as applicable local laws. Audit approaches include onsite confidential interviews with workers, document/record review, physical observations and management interviews.

Factory tour was conducted effectively including all working areas as production areas there was a total of 5 sites that were on the scope of this audit, supplies warehouses, distribution center for finished products, cafeterias, restrooms and lockers, chemical area, recycling areas, maintenance area and administrative offices; during the tour it was observed fire detection and extinguishing systems installed (fire extinguishers, fire cabinets and hoses, smoke detectors, fire alarms and emergency lightings), use of correct PPE by employees, PPE signs, no smoking signs, evacuation routes and plans, emergency exits, internal policies posted and risks signs, first aids kits, stretchers, evacuation plans and eye wash stations. Factory does not provide dormitories for employees. Lightning as well as air circulation was good in all sites.

Conclusions are drawn based on a limited, yet through sampling and collaborated from different information sources. The facility management Oscania Maravilla/ Human Resources Specialist participated in the opening and closing meeting, and she was cooperative to auditor throughout audit processes.

The requested documents and records were provided in a timely manner, for labor, health and safety, environment and management systems issues. There were two non conformances detected on the audit process both in the Health and Safety section.

A closing meeting was performed to communicate the conclusions, management had good understanding of executive summary of assessment and agreed to sign the CAP accordingly

**INNOVATION LINE**

**EVT-US-4IMP-173500**

Reference	Findings
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**8. Freedom of Association & Grievance**

8.09	<p><b>Detailed Findings</b>                  During the facility tour, it was noted that the facility does not count with a grievance mechanism such as suggestion boxes, latter on during the audit process it was confirmed with the Management Interview that there are no procedures nor mechanisms implemented to follow up with any confidential grievance such as a hotline, email or any kind of written procedure regarding this topic.</p> <p><b>Legal Requirements</b>                  ELEVATE Responsible Sourcing Standard</p> <p>In accordance with ERSA requirement:</p> <p>8.9 The facility has multiple grievance mechanisms such as a confidential means to voice grievances as well as access to someone / mechanisms other than their direct supervisor. This might include suggestion boxes, hotlines, email, workers committees, designated spaces for worker meetings, and meetings between management and workers' representatives.</p> <p><b>Recommendations</b>                  It is recommended that the facility implements multiple grievance mechanisms to assure that this procedure could be conducted on a confidential mode according to the requirements of the Code.</p>	<b>Major</b>
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**12. Health & Safety**

**12.4 Chemical & Hazardous Substances**

12.4.06	<p><b>Detailed Findings</b>                  During the facility tour it was observed that in the site called Bethoven, the Chemical Storage Area is not properly equipped with fire extinguishers and the closer extinguisher was far from what the Local Law requires.</p> <p><b>Legal Requirements</b>                  ELEVATE Responsible Sourcing Standard</p> <p>In accordance with ERSA requirement:</p> <p>12.4.6 Chemicals and hazardous substances are stored in a separate covered area that is equipped with appropriate fire extinguishers, safety signs, ventilation, anti-explosive lights, instructions on handling and disposal of chemicals, and personal protective equipment for workers.</p> <p><b>Recommendations</b>                  It is recommended that the facility installs the fire extinguishers according with the requirement for Health and Safety measures related to fire prevention.</p>	<b>Major</b>
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## INNOVATION LINE EVT-US-4IMP-173500

### WAGES OVERVIEW

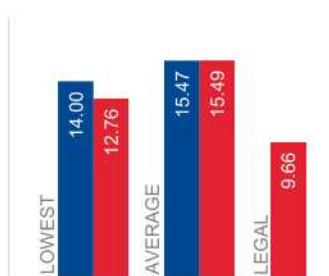
KPI	Facility Data	Country Average United States of America	% Difference
Monthly worker turnover (% avg)	24.00%	8.49%	183%
Monthly take-home (average)	2,381	2,331	2%
Monthly take-home (lowest)	2,340	1,566	49%
Paid correctly (%)	100%	100%	0%
Paid above hourly (%)	100%	100%	0%
Hourly wage (average)	15.47	15.49	0%
Hourly wage (legal)	14.00	9.66	45%
Hourly wage (lowest)	14.00	12.76	10%

Key: ■ Good Performance  
■ Underperforming

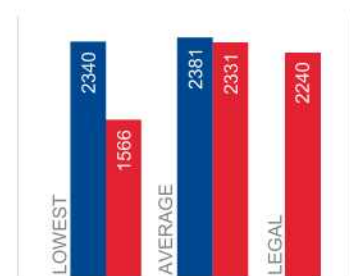
#### PAYMENT



#### HOURLY WAGES



#### MONTHLY WAGES



Facility

Country Average

#### Wages Data

Wage System:	Hourly Rate
Wage Payment Schedule:	Biweekly
Payroll Records Reviewed Period:	From August 2020 to July 2021

#### Sampling Period

Record	Current Month	Peak Month	Non-Peak Month
Payroll Records Sampling	Jul-21	Sep-20	Mar-21
Numbers of Samples Reviewed	15	5	5

### PRODUCTION INFORMATION

**Main Production Processes:** Screen Print, Pad print, digital print, engraving, award manufacturing, sublimation, heat transfers, label printing, assembly, and application

**Main Machine Types:** Printing Machines

Average units produced per week:	20,000
Units produced in last 3 months:	1,30,00,000
Units projection for next 3 months:	1,05,00,000

**Peak Season:** September, October and December



Main Product Type:	Other
Total Number of Machines:	48

**Low Season:** March

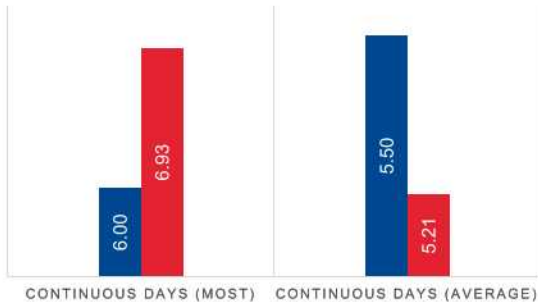
INNOVATION LINE  
EVT-US-4IMP-173500

WORKING HOURS OVERVIEW

	<i>KPI</i>	<i>Facility Data</i>	<i>Country Average United States of America</i>	<i>% Difference</i>
	Continuous days (most)	6.00	6.93	-13%
	Continuous days (average)	5.50	5.21	6%
	Weekly hours (highest)	48.00	57.79	-17%
	Weekly hours (average)	37.72	43.60	-13%
	Daily hours (highest)	12.00	11.29	6%

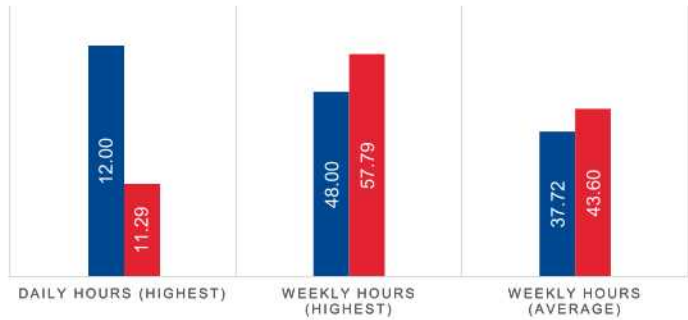
Key:  Good Performance  
 Underperforming

WORKING DAYS



Facility

WORKING HOURS



Country Average

Working Hours Data

<b>Time Recording System:</b>	Electronic
<b>Overtime Waiver:</b>	No

**Shifts and Operating Hours:** Company Operating shift 1/ from 6:00 to 17:00 Monday to Friday with a 30 min break for lunch and 2/ Production shift from 6:00 to 14:30 with a 30 min break, Monday- Friday.

Sampling Period

Record	Current Month	Peak Month	Non-Peak Month
<b>Time Records Sampling</b>	Jul-21	Sep-20	Mar-21
<b>Numbers of Samples Reviewed</b>	15	5	5



**INNOVATION LINE**  
EVT-US-4IMP-173500

**FACILITY PROFILE**

<b>Facility Name (English):</b>	Innovation Line	<b>Facility Legal Name:</b>	Innovation Specialities
<b>Facility Address (English):</b>	11869 TEALE ST , CULVER CITY CA 90230-7701	<b>Facility Legal Address:</b>	11869 TEALE ST , CULVER CITY CA 90230-7701
<b>Primary Contact Name:</b>	Oscania Maravilla	<b>Location Type:</b>	Urban
<b>Title:</b>	Human Resources Specialist	<b>Year Facility Began Operations:</b>	1980
<b>Email:</b>	oscania@innovation-line.com		
<b>Phone:</b>	310-398-8116 ext 239□		
<b>Social Compliance Contact:</b>	Oscania Maravilla	<b># of Buildings/Approx. Area (m2):</b>	5 buildings 124,000 sqm
<b>Average # of Assessments in a Year:</b>	1	<b>Dormitories:</b>	No
<b>Last 3rd Party Assessment:</b>	August 21 2018	<b>Multiple Tenants:</b>	No
		<b>Facility Owned:</b>	No

**BUSINESS INFORMATION**

**Brand(s) for client:** \_\_\_\_\_ 1

**Customer Breakdown:**

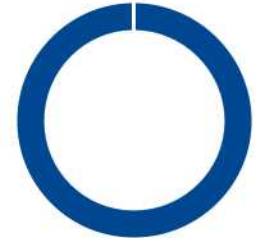
<i>Primary Customers</i>	<i>% of business</i>
<b>4imprint</b>	45%
<b>Other</b>	55%




**INNOVATION LINE**  
EVT-US-4IMP-173500

**EMPLOYEE INFORMATION**

<b>Total Number of Employees:</b>	151	<i>Worker Breakdown</i>	<i># of Workers</i>
<b>Production Workers:</b>	101	<b>United States of America</b>	101
<b>Management Staffs (Non-Prod):</b>	50		
<b>Male:</b>	43		
<b>Female:</b>	108		
<b>Local:</b>	54		
<b># of Domestic Migrant Workers:</b>	47		
<b># of Foreign Migrant Workers:</b>	0		



**Languages Spoken:**

<b>Management:</b>	English, Spanish, Castilian
<b>Employees:</b>	Spanish, Castilian, English

**Worker Age Data:**

<b># of personnel files reviewed:</b>	15
<b>Minimum legal work age:</b>	15
<b>Youngest worker found:</b>	23
<b># of Juvenile workers:</b>	0

**FREEDOM OF ASSOCIATION**

<b>Is there union in facility?</b>	No
<b>If 'Yes', name of union:</b>	NA
<b>Name(s) of union Rep:</b>	NA
<b>Is there a CBA in place?</b>	No
<b>If 'Yes', CBA valid period:</b>	NA
<b>Is there a worker committee of any kind?</b>	Yes
<b>If 'Yes', indicate the details:</b>	Health and Safety committee

**SUBCONTRACTOR INFORMATION**

**Does the Facility employ subcontractors for any part of the production process?** No

Subcontractor Name (Service Provided)  
N/A

**CURRENT CERTIFICATIONS/PROGRAMS**

<u>Certification / Program</u>	<u>Status</u>	<u>Expiry Date (Month Day, Year)</u>
BSCI		
ICTI		
EICC (RBA)		
WRAP		
SA8000		
SMETA		
BAP		
Better Work		
ISO14001		
OHSAS18001		

**INNOVATION LINE**

**EVT-US-4IMP-173500**

**Vendor Name (English):** NA  
**Facility Name (English):** Innovation Line  
**Facility Name (Local Language):** Innovation Specialities  
**Facility Address (English):** 11869 TEALE ST , CULVER CITY CA 90230-7701

**Assessor Name(s):** Sebastian Fregoso, Yunuen Vazquez (S)  
**Assessment Type:** ERSA Remote - Announced  
**Assessment Date (Month Day, Year):** **From:** August 16, 2021  
**To:** August 18, 2021

Violation Type	Detailed Finding	Legal Requirements	Recommendations	Root Cause	Corrective Action	Preventive Action	Target Date	Responsible Person
<b>8. Freedom of Association &amp; Grievance</b>								
8.09	During the facility tour, it was noted that the facility does not count with a grievance mechanism such as suggestion boxes, latter on during the audit process it was confirmed with the Management Interview that there are no procedures nor mechanisms implemented to follow up with any confidential grievance such as a hotline, email or any kind of written procedure regarding this topic.	ELEVATE Responsible Sourcing Standard In accordance with ERSA requirement: 8.9 The facility has multiple grievance mechanisms such as a confidential means to voice grievances as well as access to someone / mechanisms other than their direct supervisor. This might include suggestion boxes, hotlines, email, workers committees, designated spaces for worker meetings, and meetings between management and workers' representatives.	It is recommended that the facility implements multiple grievance mechanisms to assure that this procedure could be conducted on a confidential mode according to the requirements of the Code.					
<b>12. Health &amp; Safety</b>								
<b>12.4 Chemical &amp; Hazardous Substances</b>								
12.4.06	During the facility tour it was observed that in the site called Bethoven, the Chemical Storage Area is not properly equipped with fire extinguishers and the closer extinguisher was far from what the Local Law requires.	ELEVATE Responsible Sourcing Standard In accordance with ERSA requirement: 12.4.6 Chemicals and hazardous substances are stored in a separate covered area that is equipped with appropriate fire extinguishers, safety signs, ventilation, anti-explosive lights, instructions on handling and disposal of chemicals, and personal protective equipment for workers.	It is recommended that the facility installs the fire extinguishers according with the requirement for Health and Safety measures related to fire prevention.					

<b>Facility Rep Comments:</b>

I have been notified of the above Findings and understand that the corrective actions will be completed by the agreed date

<b>Signature – Facility Rep</b>
<b>Print name &amp; title – Facility Rep</b>

<b>Signature – Assessor (s)</b>
<b>Print name – Assessor (s)</b>

<b>Date (Month Day, Year)</b>

<b>Date (Month Day, Year)</b>

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"SPACE"

## Photo Form

### A. Assessment details

Client Name:	4imprint	Report No:	EVT-US-4IMP-173500
Facility Name:	Innovation Line	Assessment Date:	August 16-18, 2021

### B. Photos

Photos relevant to the factory visit and findings, taking into account client-specific requirements for photos to take and report. If providing photo evidence of records, please consider sending a separate file in .pdf that is large enough to read the records (e.g., to document inconsistent records).



1: Finding 1, Chemical Storage with no fire extinguisher



2: Facility Main Entrance



3: External Photo Facility Building



4: Main Production Process Flow



5: Main Production Process Flow



6: Photos of Fire Safety Equipment



7: Photos of PPE/Eye Washer



8: Photos of First Aid Kits



9: Publications

## A. ASSESSMENT DETAILS

<b>Report No:</b>	EVT-US-4IMP-173500	<b>Facility Name:</b>	Innovation Line
<b>Assessment Date:</b>	August 16, 2021 - August 18, 2021	<b>Assessor Name (s)</b>	Sebastian Fregoso, Yunuen Vazquez (S)
<b>Report written by:</b>	Sebastian Fregoso	<b>Report Reviewed by:</b>	Yesudas

### Protection of Workers and Facility Communication

The following details may have been obtained from worker interview evidence only. Facility management may not have all of these details. Please take into account the sensitivity of these details and the possible retaliation workers may incur based on this information. This information should be kept secure and only communicated with due care and diligence.

## B. TRANSPARENCY STATUS

### Wages and Working Hours

Select one conclusion among 1# to 3# to indicate the transparency level of provided wages and working hours records

<b>1. Transparent: Level of transparency on wages and working hours is high</b>	<input checked="" type="checkbox"/>
<b>2. Inconsistent: Level of transparency on wages and working hours is low</b>	<input type="checkbox"/>
<b>3. Inconclusive: Level of transparency on wages and working hours is of concern</b>	<input type="checkbox"/>

### Factory Permits, Certificates or Approvals

Select if errors or omissions found; otherwise, leave it blank here

<b>4. Errors or omissions in government permits, certificates or approvals</b>	<input type="checkbox"/>
--	--------------------------

<b>Was the factory firstly providing inconsistent records and finally transparent? If yes, please explain details below.</b>	No
--	----

NA

## C. WORKER INTERVIEWS

<b>Total Number of workers interviewed:</b>	15
<b>Number of workers for individual interviews:</b>	10
<b>Number of workers for group interviews:</b>	5

### Worker Interview Notations

Interviews were conducted after concluding the facility tour, in the interviews a total of 9 females and 6 males participated. Workers indicated to feel comfortable as this company is one of the few companies that hires employees directly without using an agency most of the employees have been working on the site for over 10 years and overall they feel really comfortable in all terms. Workers indicated that HS, Environment, Labor and Ethics are commonly conducted and some workers indicated to previously participated in an Social Compliance interview from past audits. They indicated that most of the hired workers are spanish speakers and the management speaks both spanish and english, making the work easier. All instructions, documents and trainings are both in english and spanish. They felt happy to work in this company, a good environment interlay was confirmed also by all workers, including wo workers and supervisors.

## D. INTERNAL ASSESSOR NOTES

### Assessor Attention

This section is designed for auditor to include any subjective opinions concerning the audit, describe any negative response(s) to the process, and disclose confidential information that cannot be included in the client's reporting documents.

This audit had an extension on the staff days assigned for a total of 3 days as this is a multi-site company, a total of 5 sites were in the scope of the audit, this was the only extension for the scope mainly for HSE purposes as the site tour was extensive. The sample for document review keeps the same as the working instructions based on the employees headcount.

## E. ASSESSMENT DATA

### Employee Information

<b>Total Number of Employees:</b>	151						
<b>Male:</b>	43						
<b>Female:</b>	108						
<b>Nationality(ies) of Owner(s):</b>	United States of America						
<b># of Management Staffs (Non-Production):</b>	50						
	<b>Breakdown of Management Staffs by Nationality</b>						
	<table border="1"> <thead> <tr> <th>Country</th> <th># of Management</th> </tr> </thead> <tbody> <tr> <td>Mexico</td> <td>45</td> </tr> <tr> <td>United States of America</td> <td>5</td> </tr> </tbody> </table>	Country	# of Management	Mexico	45	United States of America	5
Country	# of Management						
Mexico	45						
United States of America	5						
<b># of Production Workers:</b>	101						
<b># of Local Workers:</b>	54						
<b># of Domestic Migrant Workers:</b>	47						
<b>Any domestic highly vulnerable labor identified:</b>	No						
<b># of Foreign Migrant Workers:</b>	0						
	<b>Breakdown of Workers by Nationality</b>						
	<table border="1"> <thead> <tr> <th>Country</th> <th># of Workers</th> </tr> </thead> <tbody> <tr> <td>United States of America</td> <td>101</td> </tr> </tbody> </table>	Country	# of Workers	United States of America	101		
Country	# of Workers						
United States of America	101						
<b>**Labor Agent(s) used or not?:</b>	No						
<b>Average Monthly Worker Turnover Rate:</b>	24.00%						
<b># of Work-related Injury cases in the past 12 months:</b>	2						
<b>Languages Spoken by Management:</b>	English, Spanish, Castilian						
<b>Languages Spoken by Workers:</b>	Spanish, Castilian, English						
<b>Are dormitories provided to workers:</b>	No						
<b>Are dormitories Offsite / Onsite:</b>	N/A						
<b>Average monthly absenteeism in staff days lost per month:</b>	25						

### Business Information

<b>Brand(s) for client:</b>	1
<b>Production % for client:</b>	45.00%
Primary Customers (one per line)	% Business (yearly)
4imprint	45.00%



Production Information	
Location Type:	Urban
Year Facility Began Operations:	1980
# of Buildings/Approx. Area (m2):	5 buildings 124,000 sqm
Are there Multiple Tenants?:	No
Facility owns building(s)?:	No
How many assessments does facility typically receive per year?	1
Main Product Type:	Other
Main Production processes at facility:	Screen Print, Pad print, digital print, engraving, award manufacturing, sublimation, heat transfers, label printing, assembly, and application
Peak Season:	September, October and December
Low Season:	March
Average re-work rates as a % of total production:	0.01%
% of total maximum production currently being utilized:	85.00%
Is any wet processing conducted on site (Applicable for apparel industry only):	No

Working Hours Data			
Time Recording System:	Electronic		
Shifts and Operating Hours:	Company Operating shift 1/ from 6:00 to 17:00 Monday to Friday with a 30 min break for lunch and 2/ Production shift from 6:00 to 14:30 with a 30 min break, Monday- Friday.		
Time Records Reviewed Period:	From August 2020 to July 2021		
	<u>Current Month</u>	<u>Peak Month</u>	<u>Non-Peak Month</u>
Time Records Sampling:	Jul-21	Sep-20	Mar-21
Numbers of Samples Reviewed:	15	5	5
Is there an Overtime waiver?	No		

	<u>Day</u>	<u>Week</u>	<u>Month</u>
Legal OT hours Limits:	0	0	0
Highest OT hours:	4	8	61
Highest work hours:	12	48	221
Average work hours:	7.544	37.72	150.88
Legal standard work hours:	8	40	160
Standard work hours:	8	40	160

Legal Required Rest days / week:	1
Rest days / week:	2
Most continuous days without rest:	6

<b>Average continuous days without rest:</b>	5.5
--	-----

<b>Wages Data</b>			
<b>Wage System:</b>	Hourly Rate		
<b>Wage Payment Schedule:</b>	Biweekly		
<b>Wage Payment Method (e.g. in cash, bank transferring):</b>	Bank transferring		
<b>Wage Payment Currency:</b>	USD		
<b>Payroll Records Reviewed Period:</b>	From August 2020 to July 2021		
	<b><u>Current Month</u></b>	<b><u>Peak Month</u></b>	<b><u>Non-Peak Month</u></b>
<b>Payroll Records Sampling:</b>	Jul-21	Sep-20	Mar-21
<b>Numbers of Samples Reviewed:</b>	15	5	5
	<b><u>Hourly</u></b>	<b><u>Daily</u></b>	<b><u>Monthly</u></b>
<b>Legal minimum wage:</b>	14	112	2240
<b>Lowest hourly wage:</b>	<b>All Samples</b>	<b>Males</b>	<b>Females</b>
	14	14	14
<b>Average hourly wage:</b>	15.47		
<b>% of workers being paid at least hourly minimum wage:</b>	100.00%		

<b>Legal overtime wage premium:</b>	150% of the regular rate
<b>Overtime premium paid:</b>	150% of the regular rate
<b>Lowest total monthly take-home wages:</b>	2340
<b>Average total monthly take-home wages:</b>	2380.8
<b>Largest total wage gaps / month:</b>	0
<b>Average total wage gaps / month:</b>	0
<b>% of workers paid a total wage equal to or higher than legal monthly minimum wage:</b>	100.00%
<b>% of worker being paid correctly (no minimum and OT wage gap):</b>	100.00%

<b>Freedom of Association</b>	
<b>Is there union in facility?</b>	No
<b>If 'Yes', name of union:</b>	NA
<b>Name(s) of union Rep:</b>	NA
<b>Does the factory have any worker representative regardless any union exists:</b>	No
<b>Is there a CBA in place?</b>	No
<b>If 'Yes', CBA valid period:</b>	NA
<b>Does the factory have a worker-management committee:</b>	No
<b>Is there a worker committee of any other kind?</b>	Yes

If 'Yes' to either questions above, indicate the details:	Health and Safety committee
---	-----------------------------

Worker Age Data	
-----------------	--

Number of personnel files reviewed:	15
Minimum legal work age:	15
Youngest worker found:	23
Number of Juvenile Worker:	0

Current certifications/programs		
---------------------------------	--	--

Certification / Program	Is Certification/Program Active?	Expiry Date (YYYY/MM/DD) (Leave Blank if not active)
BSCI:	No	
ICTI:	No	
EICC (RBA):	No	
WRAP:	No	
SA8000:	No	
SMETA:	No	
BAP:	No	
Better Work:	No	
ISO14001:	No	
OHSAS18001:	No	

Consultancy	
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<b>Does the assessor suspect an unethical consultant might have been used by the factory? If yes, please explain why.</b>	No
---	----

NA

# Draft CAP — EVT-US-4IMP-173500 — Innovation Line

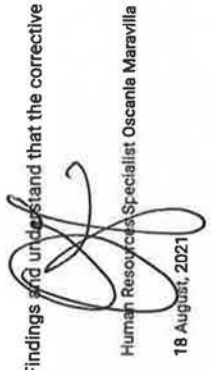
Vendor Name (Eng) Sebastian Fregoso, Yunuen Vazquez (S)  
 Facility Name (Eng) Innovation Line  
 Facility Name (Original) Innovation Specialities  
 Facility Address (Eng) 11869 TEALE ST., CULVER CITY CA 90230-7701  
 Assessor Names announced  
 Assessment Type August 16 – 18, 2021  
 Assessment Date

Violation Type	Detailed Finding	Legal Requirements	Recommendations	Root Cause	Corrective Action	Preventive Action	Target Date	Responsible Person
<b>8. Freedom of Association &amp; Grievance</b>								
8. 9 The facility has multiple grievance mechanisms such as a confidential means to voice grievances as access to someone / mechanisms other than their direct supervisor. This might include suggestion boxes, hotlines, email, workers committees, designated spaces for worker meetings, and meetings between management and workers' representatives.	During the facility tour, it was noted that the facility does not count with a grievance mechanism such as suggestion boxes, latter on during the audit process it was confirmed with the Management interview also that there are no procedures nor mechanisms implemented to follow up with any confidential grievance such as a hotline, email or any kind of written procedure regarding this topic	ELEVATE Responsible Sourcing Standard  8.9 The facility has multiple grievance mechanisms such as a confidential means to voice grievances as well as access to someone / mechanisms other than their direct supervisor. This might include suggestion boxes, hotlines, email, workers committees, designated spaces for worker meetings, and meetings between management and workers' representatives.	It is recommended that the facility implements multiple grievance mechanisms to assure that this procedure could be conducted on a confidential mode according to the requirements of the Code					
<b>12. 4. Chemical &amp; Hazardous Substances</b>								
12.4. 6 Chemicals and hazardous substances are stored in a separate covered area that is equipped with appropriate fire extinguishers, safety signs, ventilation, anti-explosive lights, instructions on handling and disposal of chemicals, and personal protective equipment for workers.	During the facility tour it was observed that in the site called Bethoven the Chemical Storage Area is not properly equipped with fire extinguishers and the closer extinguisher was further from what the Local Law requires.	ELEVATE Responsible Sourcing Standard  12.4.6 Chemicals and hazardous substances are stored in a separate covered area that is equipped with appropriate fire extinguishers, safety signs, ventilation, anti-explosive lights, instructions on handling and disposal of chemicals, and personal protective equipment for workers.	It is recommended that the facility installs the fire extinguishers according with the requirement for Health and Safety measures related to fire prevention.					

Facility Rep Comments

I have been notified of the above Findings and understand that the corrective actions will be completed by the agreed date

  
 Sebastian Fregoso  
 18 August, 2021

  
 Human Resources Specialist Oscaania Maravilla  
 18 August, 2021

Signature - Facility Rep  
 Print name & title - Facility Rep  
 Date (Month Day, Year)

Signature - Assessor (s)  
 Print name - Assessor (s)  
 Date (Month Day, Year)

# Draft CAP — EVT-US-4IMP-173500 — Innovation Line

Disclaimer: This report/submission is a preliminary result of findings, intended for reference only. Preliminary findings should not be used to undertake decision making. Any actions taken as a result of the preliminary findings will be at the risk of the reader and ELEVATE will bear no consequence or liability for any actions undertaken based on the preliminary findings. The final report will be issued by ELEVATE at a later date. This preliminary report/submission shall not be distributed or reproduced in any form without the prior written consent of ELEVATE.

A handwritten signature in black ink, appearing to be 'J. Stogor', is written in the upper right quadrant of the page.



# Social Compliance Assessment Report

Prepared for: Innovation Specialties, Inc., dba Innovation Line

Assessment Date(s): 08/14/2015, 08/14/2015

## Client Profile

### Innovation Specialties, Inc., dba Innovation Line

Contact Person:	Eddie Blau
Phone:	800 - 421 - 4445
Fax:	310 - 390 - 5793
Email:	info@innovation-line.com

## Supplier Profile

Client Supplier ID:	N/A	Supplier Name (Local Language):	N/A
Supplier Name:	N/A		
Supplier Contact Name:	N/A		
Supplier Phone:	N/A		
Supplier Fax:	N/A		
Supplier Email:	N/A		

## Current Assessment Profile

Facility Name:	Innovation Specialties, Inc., dba Innovation Line		
Report Number:	DR00000.11111.01	Assessment Start Time:	08:00:53
Assessment Result/Grade:	Intermediate	Assessment End Time:	17:30:30
Assessment Type:	Initial	Name of Auditor or Assessor (Lead):	Fredi Castro
Is this assessment date announced or not?	Announced with a window	Name of Auditors or Assessors (Team):	Fredi Castro / N / A
Assessment Start Date:	08/14/2015	Other Parties Involved in Assessment:	Client N/A
Assessment End Date:	08/14/2015	Report Author:	Fredi Castro
Number of Person Days:	1		

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## 1. Assessment Overview

### 1.1 Summary of Activities

#### Opening Meeting:

Upon arrival to the facility, the auditor Fredi Castro was greeted by Mike Giacoletti VP of Operations and escorted to Eddie Blau's office room where an opening meeting was conducted with Eddie Blau President and Mike Giacoletti VP of Operations. The assessment procedures, were explained, and the UL Statement of Integrity was signed by a facility representative. Access to employees, facility and documentation was fully granted. Ana Guerra Personnel Supervisor a representative of Select Staffing was also present but was not part of the opening meeting.

#### Facility Walkthrough:

A health and safety walkthrough was facilitated by Eddie Blau President and Mike Giacoletti VP of Operations which provided an overview of the facility work floor. The facility is composed of four buildings measuring 25,000 SQ FT (1<sup>st</sup> building), 6,500 SQFT (2<sup>nd</sup> building), 5,000 SQFT (3<sup>rd</sup> building) and 3,400 SQFT (4<sup>th</sup> building) a total of 40,000 SQFT combined. All areas of the facility were visited including the work floor, maintenance room, warehouse, restrooms, employees' lunch room and chemical room.

All production areas were visited in all four buildings, as well as chemical storage places, employee common areas, and shipping and warehouse departments. In general lines, the facility seemed compliant with safety regulations, being well illuminated, ventilated and with overall comfortable working conditions. None of the workers were observed performing activities that could put their physical integrity in jeopardy.

A full emergency action plan was provided for review showing that the facility was reportedly prepared to deal with several unexpected events. Employees were properly trained in EAP and blood borne pathogens procedures. Fire drills are conducted annually, the records indicated. During private interviews, employees stated that they were aware of emergency procedures and knew the names of the emergency response team members.

There were no electrical hazards noted. The facility was equipped with firefighting equipment including fire extinguishers, fire alarm, sprinklers in which are inspected annually by America's Fines Fire Inc. All fire equipment seemed to meet OSHA requirements. Machinery was guarded, equipped with emergency shut-off buttons and posed no apparent imminent risks to operators.

The facility does use hazardous chemicals onsite, although primarily in a designated area in which only a few employees are authorized to work, after receiving extensive hazards training, like hazardous communication and chemical handling. The auditors also observed that emergency eyewash stations were scattered around the production areas, substantially near chemical products. All hazardous chemicals were stored properly with the necessary secondary containment units. MSDS information was available to all employees.

Lockout/Tagout certification had been provided to authorized personnel and LOTO awareness training had been provided to workers directly linked to activities that require this procedure. The facility has formal trainings in place and safety trainings are conducted routinely including but not limited to forklift training and certification, CPR/AED, fire extinguisher, evacuation procedures, hazcom, among several others. OSHA log 300A for 2014 was reviewed showing 0 recordable injuries.

While visiting all common areas, the auditors realized that employees had access to clean and sanitary facilities. Legal postings were also available.

## 1. Assessment Overview

### Documentation Review:

After the walkthrough, facility management provided access to facility Environmental, Health and Safety (EHS) documentation. The following EHS documentation was reviewed:

- OSHA Logs forms, Fire inspections invoices and test results.
- Water testing done by DWP of Los Angeles
- Waste water permits was provided.
- Work floor policies and rules
- Business License
- Proof of workers compensation:

Travelers

Policy No.: EIG 1121885 06

Effective date: 1/1/2015

Expiration date: 1/1/2016

- I-9 Forms
- Payroll records
- Health & Safety records

Furthermore, a payroll assessment was conducted and one full year of payroll and time records were made available for the review. A sampled of 10 pay roll records from employees hired directly from the facility were selected for verification purposes and a sampled of 5 pay roll record from employees hired from Select Staffing were used for verification purposes.

As part of the payroll review, Fredi Castro requested and was provided with three payroll periods as the sample for the payroll assessment. In each period, 15 were sampled. Facility management informed auditors that the facility experienced a peak season during April through June and a low season in the month of July. The auditor requested to review the pay register and corresponding time records for periods ending 8/7/15, 7/10/15 and 4/10/15. The records displayed all required information pertaining to the employees. Employees are paid on a bi-weekly (direct hires) and weekly (Select Staffing employees). Employees receive payment by means of check or via direct deposit (optional).

The reviewed payroll records consisted of 15 electronic timecard records. Payroll register displayed employee name, weekending date, all regular and overtime hours worked, hourly rates, earnings, additions/deductions, net and gross earnings and client production records.

### Employee Interviews:

A sample of 15 employees was selected to include 9 females and 6 males. Employees were sampled from different departments, such as assembly, machine operators, shipping, maintenance, warehouse, screen printing and packing. The same sample of 15 employees was selected for private interviews. Employees stated they receive 1 - 20 minute rest break and one 30 minute meal break per 8 hour shift. Break times are never interrupted. The facility has an open door policy in regards to reporting any concerns the workforce may have. Requests for time off are granted when reported with advance notice. All overtime hours are reported to be worked voluntarily. Safety training was reported to be provided on a regular basis.

### Closing Meeting:

The assessment for Innovation Specialties, Inc., dba Innovation Line was conducted on August 14, 2015. Upon arrival,

## 1. Assessment Overview

an opening meeting was held in Eddie Blau's President office along with Mike Giacoletti VP of Operations. Facility information was obtained and documentation requested, a health and safety walkthrough was conducted and interviews took place.

The UL Statement of Integrity was signed by Eddie Blau's President.

At the end of the audit, a closing meeting was held and the Summary of Findings was reviewed and signed by Eddie Blau's President. Based on the assessment, the facility received a final grade of "Intermediate" for future sourcing. The assessment was concluded at 5:30 PM.

**Social Compliance Assessment Report**

**Innovation Specialties, Inc., dba Innovation Line  
08/14/2015**

**Audited On: 08/14/2015,**

**1. Assessment Overview**

**1.2 Facility Risk Rating and Performance**

**Table 1:** Current and previous assessment information

Current Assessment		Previous Assessment	
Assessment Date:	08/14/2015, 08/14/2015	Assessment Date:	N/A
Assessment Result/Grade:	<b>Intermediate</b>	Assessment Result/Grade:	<b>N/A</b>
Assessment Type:	Initial	Assessment Type:	N/A
		Previous assessment completed by UL:	

**Table 2:** Number of findings in current assessment:

Category	Legal Findings	International Standard and/or Minimum Recommendation Findings (if law not applicable)	Client Code of Conduct Findings (if law, international standard and minimum recommendations not applicable)
<b>Facility Profile</b>	-	0	0
<b>Facility Supply Chain Profile</b>	-	0	0
<b>Management Systems</b>	-	0	0
<b>Labor</b>	1	0	0
Hiring & Termination	1	0	0
<b>Health &amp; Safety</b>	7	0	0
Emergency	5	0	0
Other Practices	2	0	0
<b>Environment</b>	0	0	0
<b>Ethics &amp; Business Integrity</b>	0	0	0
	[8]	[0]	[0]
<b>Total Number of Findings</b>	Legal	International Standard and/or Minimum Recommendation Findings (if law not applicable)	Client Code of Conduct Findings (if law, international standard and minimum recommendations not applicable)

**Social Compliance Assessment Report**

**Innovation Specialties, Inc., dba Innovation Line  
08/14/2015**

**Audited On: 08/14/2015 ,**

**2. Facility Profile**

**Total # of Findings: 0**

Facility Name:	Innovation Specialties, Inc., dba Innovation Line
Facility Name in Local Language:	Innovation Specialties, Inc., dba Innovation Line
Facility Address:	11869 Teale Street,Culver City ,CA,USA
Facility Address in Local Language:	11869 Teale Street,Culver City,CA,USA
Facility Contact Name:	Mike
Facility Phone:	Not provided
Facility Fax:	Not provided
Facility Email:	Not provided

**2.1 Facility Access**

Can you access the facility?	Yes
------------------------------	-----

**2.2 Certifications**

Valid certifications or stakeholder initiative participation:	N/A
---	-----

**2.3 Production Profile**

Industry sector:	General Consumer Merchandise
Principal products:	Imprinted promotional products including tote bags, office products, key tags, tools, luggage tags, First aid kits plus more.
Production capacity per month:	2,000,000 pcs
% of total production for client:	100%
% of total production for other current clients:	0%
Labels viewed on production floor:	Not provided
Is the facility operating at full capacity?	Yes

**2.4 Personnel Profile**

Total number of employees (excl. contracted employees):	165
total male	56
total female	108
permanent	145
temporary (facility direct hire)	19
part-time (facility direct hire)	1
night	8
pregnant	0
on maternity leave	0
piece-rate	0
salaried	22
hourly paid	143
homeworkers	0
apprentice / trainees	0
employees under the age of 18	0
foreign imported/ foreign migrant	0
hired by the facility through labor brokers	0
contracted employees working in production	17

**Social Compliance Assessment Report**

**Innovation Specialties, Inc., dba Innovation Line  
08/14/2015**

**Audited On: 08/14/2015 ,**

**2. Facility Profile**

**Total # of Findings: 0**

contracted employees indirectly related to production (e.g. security, maintenance)	0
age youngest employee:	19
nationalities of the employees:	Hispanic, Asian, White
employee turnover rate of facility direct hires:	1.5%
employee absenteeism by gender of facility direct hires:	Not obtain

**2.5 License**

Does the facility possess a business license?	Yes
Is the business license maintained and posted in accordance with applicable standards?	<p>Yes</p> <p><b>Business License: Innovation Specialties, Inc., dba Innovation Line</b>  <b>City of Los Angeles Tax Registration Certificate</b>  <b>Issued 3/18/2000</b>  <b>Business Description: Retail Sales</b></p> <p><b>City of Los Angeles Tax Registration Certificate</b>  <b>Issued 3/18/2000</b>  <b>Business Description: Wholesale</b></p> <p><b>Business License: Select Staffing Extra Mile Service</b>  <b>City of El Segundo</b>  <b>Business Type: business general 4-2-4</b>  <b>Expires: 12/31/2015</b></p>

**2.6 Labor Disputes**

Has the facility been free of any public labor disputes (e.g. strike, demonstration) in the last 2 years?	Yes
---	-----

**2.7 Community Engagement**

Does the facility support its community through any type of engagement?	N/A
Has the facility conducted a social impact assessment (including human rights, gender and conflict) to evaluate the impact of the operation on the community?	N/A

**Social Compliance Assessment Report**

**Innovation Specialties, Inc., dba Innovation Line  
08/14/2015**

**Audited On: 08/14/2015 ,**

**3. Facility Supply Chain Profile**

**Total # of Findings: 0**

**3.1 Subcontracting**

The facility does not use subcontractors	Yes
--	-----

**3.2 Contractors**

The facility does not use contractors	Yes
---------------------------------------	-----

**3.3 Homeworkers**

The facility does not use homeworkers.	Yes
Is client informed of homeworke use?	N/A

**3.4 Governance**

Are applicable standards (e.g. facility, client, legal) communicated to facility's suppliers, subcontractors, contractors, customers and partners?	Yes
--	-----

**3.5 Risk Assessment**

Has the facility conducted a supply chain risk assessment to identify suppliers, subcontractors, contractors, customers and partners who constitute a risk to the facility?	Yes
---	-----

**3.6 Auditing**

Does the facility audit its suppliers, subcontractors, contractors, customers and partners?	Yes
---	-----

**4. Management Systems**

**Total # of Findings: 0**

**4.1 Certifications**

Does the facility have valid management systems certifications?	No
---	----

**4.2 Governance**

Has the facility established policies/ codes governing labor, grievances, health and safety, environment, and ethics and business integrity?	Yes
--	-----

**4.3 Compliance**

Has the facility implemented a mechanism that identifies, keeps up to date and alerts applicable personnel of all standards (e.g. legal, client) that the	Yes
---	-----



## Social Compliance Assessment Report

facility must comply with?	
<b>4.4 Responsibility</b>	
Does the facility have in place management personnel to implement the facility's policies, client specific requirements and legal requirements in the areas of labor, grievances, health and safety, environment, and ethics and business integrity?	Yes
<b>4.5 Education</b>	
Does the facility communicate and train employees (all levels) on the facility's policies, client specific requirements and legal requirements in the areas of labor, grievances, health and safety, environment, ethics and business integrity?	Yes
<b>4.6 Performance</b>	
Has the facility identified performance objectives related to labor, grievances, health and safety, environment, and ethics and business integrity?	Yes
<b>4.7 Grievance Mechanism</b>	
Does the facility maintain a grievance procedure by which employees can confidentially raise issues of concern to management without fear of reprisal or negative repercussions?	Yes
<b>5. Labor</b>	<b>Total # of Findings: 1</b>
<b>5.1 Postings</b>	
Are labor-related notices posted in language(s) understood by employees and in accordance with other applicable standards?	Yes
<b>5.2 Privacy</b>	
Does the facility maintain privacy of employee's records by keeping employees' personal data confidential and limiting access to such data to authorized staff?	Yes
<b>5.3 Hiring &amp; Termination</b>	
Do actual employment terms meet the job expectations promised at time of recruitment?	Yes
Are employees free from paying charges for the purpose of recruitment or employment, including fees (e.g. recruitment, transportation), taxes, deposits or bonds (e.g. training bond)?	Yes
Are tests (e.g. medical, aptitude) executed for hire/recruitment in accordance with applicable standards?	Yes
Are employees hired and maintained in employment	Yes

## Social Compliance Assessment Report

regardless of pregnancy status or marital status?	
Is birth control forbidden as a condition for hiring and maintaining employment?	Yes
Are employees aware of their employment terms in accordance with applicable standards?	Yes
Does the facility provide employees with a written document that outlines the employment terms in accordance with applicable standards?	Yes
Does the facility keep and maintain the written employment terms in accordance with applicable standards?	Yes
Are employees classified in accordance with applicable standards?	Yes
Are employee probation periods in accordance with applicable standards?	Yes
Does the facility maintain documentation that indicates employees' eligibility to work in accordance with applicable standards?	No  6 out the 10 sampled I-9 Forms provided were not completed. Section 2 were missing information.  8 CFR (2010) 274a.2 (b)(1)(ii)
Does the facility request original, legal documentation to verify the employee's age at the time of hire?	Yes
Is termination of employment and maintenance of termination records executed in accordance with applicable standards?	Yes
Are employees free from threats of illegal terminations (e.g. threats of repatriation for foreign workers)?	Yes
Are other hiring and termination practices in accordance with applicable standards?	Yes
<b>5.4 Remuneration</b>	
Does the facility maintain payroll records?	Yes
Payroll period(s) reviewed for assessment sample:	PE: 8/7/15, 7/10/15 and 4/10/15

## Social Compliance Assessment Report

Are reviewed payroll records maintained in accordance with applicable standards?	Yes
Does the facility maintain production records in accordance with applicable standards?	N/A
What is the method of recording production output?	N/A
Does the information in reviewed payroll records, production records and interviews correspond?	Yes
Is the legal minimum wage guaranteed to employees in accordance with applicable standards?	Yes
Lowest legal regular hourly rate (USD conversion)	9
Highest regular hourly rate paid by the facility (USD conversion)	14.5
Lowest regular hourly rate paid the facility (USD conversion)	9
Average regular hourly rate paid by the facility (USD conversion)	11.75
Average rate of pay (regular and overtime) per legal pay period paid by the facility (USD conversion)	15.38
Are employees compensated at the rate dictated by the applicable standard?	Yes
Are employees paid for down time in accordance with applicable standards?	Yes
For piece rate workers, is production quota determined through a government study, time and motion study, or other study?	N/A
Is the payment method in accordance with applicable standards?	Yes
Are wages paid directly to the employee or an employee-controlled account?	Yes
Is the wage policy, such as pay date and pay rates, communicated to employees?	Yes

## Social Compliance Assessment Report

Is the pay frequency in accordance with applicable standards?	Yes
Is the time of payment in accordance with applicable standards?	Yes
Is overtime paid in accordance with applicable standards?	Yes
Does the facility provide employees with an understandable wage statement that, at minimum, includes regular and overtime hours worked, regular and overtime earnings, and deductions in accordance with applicable standards?	Yes
Are deductions from employee wages in accordance with applicable standards?	Yes
Are employees provided equipment used in the process of employment (e.g. tools, uniforms, PPE) paid for by the facility in accordance with applicable standards?	Yes
Are other remuneration practices in accordance with applicable standards?	Yes
<b>5.5 Benefits</b>	
Do employees receive additional remuneration (e.g. bonuses, incentives, allowances)?	No
Do employees receive applicable benefits in accordance with applicable standards?	Yes
Do employees receive non-monetary benefits not required by applicable standards?	No
<b>5.6 Working Hours</b>	
Standard hours of operation	The facility does not have standard operating hours. It all depends on the volume of work.
Number and duration of breaks during work day	One 20 minute break and one unpaid 30 meal break.
Does the facility maintain time records?	Yes
Time record period(s) reviewed for assessment sample:	PE: 8/7/15, 7/10/15 and 4/10/15

## Social Compliance Assessment Report

Are time records maintained in accordance with applicable standards?	Yes
Are employees working regular working hours (daily, weekly, monthly, other) in accordance with applicable standards?	Yes
Highest number of regular hours per week permitted under law	There is no limit.
Highest number of regular hours per week worked at the facility	80 bi-weekly hours
Lowest number of regular hours per week worked at the facility	71 bi-weekly hours
Average number of regular hours per week worked at the facility	77.53
Are employees working overtime hours (daily, weekly, monthly, other) in accordance with applicable standards?	Yes
Does the facility have an overtime waiver in accordance with applicable standards?	N/A
Highest number of overtime hours per week permitted under law:	No limit
Highest number of overtime hours per week worked at the facility:	13 bi-weekly hours
Lowest number of overtime hours per week worked at the facility:	0
Average number of overtime hours per week worked at the facility:	1.5
Are employees informed about and understand overtime obligations prior to employment and prior to working the overtime shift?	Yes
Do employees receive rest breaks during the day in accordance with applicable standards?	Yes
Do employees receive daily rest in accordance with applicable standards?	Yes
Do employees receive weekly rest in accordance with applicable standards?	Yes

## Social Compliance Assessment Report

Maximum number of consecutive days worked permitted by law:	7
Maximum number of consecutive days worked at the facility:	6
Does the facility prevent employees from taking work home to finish the task or quota?	Yes
Does the facility follow provisions on the number of women's working hours in accordance with applicable standards?	Yes
Are other working hour practices in accordance with applicable standards?	Yes

### 5.7 Forced, Bonded, Indentured, Slave, Prison labor

Do employees maintain custody of their original documents (e.g. passport, work permit, birth certification, official ID card, driver's license, family record book)?	Yes
Are employees free to resign employment in accordance with applicable standards?	Yes
Are employees guaranteed freedom of movement during and after working hours?	Yes
Does the facility avoid withholding wages or requiring deposits of any kind during the employment relationship in accordance with applicable standards?	Yes
Are employees free from daily production quota requirements prior to leaving the facility?	Yes
Is overtime voluntary?	Yes
Is mandatory overtime permitted by law?	No
Does the facility avoid involving convicts in its production processes (not limited to processes of client)?	N/A
Does the facility avoid other abusive employment practices that are not in accordance with applicable standards?	Yes

### 5.8 Child Labor, Young Workers, Apprentices/ Trainees

## Social Compliance Assessment Report

Facility minimum hiring age standard (yrs):	18 years of age.
Are employees currently employed at an age in accordance with applicable standards?	Yes
At the time of hire, was the age in accordance with applicable standards?	Yes
Are working conditions (e.g. task, hours) for employees under the age of 18 in accordance with applicable standards?	Yes
Are required medical tests before and during employment conducted for employees under the age of 18 in accordance with applicable standards?	N/A
Does the facility maintain permits, licenses, parental consent forms and other documents related to the employment of apprentices, trainees and employees under the age of 18 in accordance with applicable standards?	N/A
Are identified apprenticeship/ traineeships administered by the facility in accordance with applicable standards?	N/A
Does the facility have a system in place to remediate situations where an employee is discovered to have not been hired in accordance with applicable standards on minimum age.	N/A
Are other child, young workers, apprentice, and trainee employment practices in accordance with applicable standards?	N/A
<b>5.9 Abuse, Coercion, Harassment, Disciplinary Action</b>	
Are employees free from any form of abuse, harassment, coercion or corporal punishment?	Yes
Are employees free from pressure, coercion, or threats by any means to maintain them in employment?	Yes
Were employees free from pressure, coercion, or threats by any means during recruitment?	Yes
Does the facility maintain procedures on disciplinary action?	Yes
Are disciplinary practices administered in accordance with applicable standards?	Yes

## Social Compliance Assessment Report

Are security practices administered in accordance with applicable standards?	Yes
Are other disciplinary-related practices in accordance with applicable standards?	Yes
<b>5.10 Discrimination</b>	
Are employees free from discrimination in accordance with applicable standards?	Yes
Does the facility maintain procedures to prohibit and prevent discriminatory practices.	Yes
Does the facility follow provisions on women's employment terms during pregnancy, maternity leave and return from maternity leave in accordance with applicable standards?	Yes
Does the facility accommodate the beliefs of employees (e.g. head dress, prayer breaks) as far as practicable?	Yes
<b>5.11 Freedom of Association and Collective Bargain</b>	
Are employees free to associate and collectively bargain in accordance with applicable standards?	Yes
Where the ability to associate and collectively bargain are legally restricted, do employees have access to alternative means in accordance with applicable standards?	Yes
Are employees members of a union?	No
Are employees subject to a collective bargaining agreement?	No
Are employees members of a workers' organization?	No
Do employees have any worker representation apart from unions or workers' organizations?	Yes
Are activities (e.g. elections, meetings) associated with workers' representation (union, workers' organization and other representation) permitted by the facility in accordance with applicable standards?	Yes
Are other freedom of association and collective bargaining practices in accordance with applicable standards?	Yes



## Social Compliance Assessment Report

6. Health & Safety		Total # of Findings: 5
<b>6.1 Licenses/ Permits/ Certifications</b>		
Is the facility in possession of H&S permits, licenses and/or certifications that are current and in accordance with applicable standards?	Yes	
<b>6.2 Postings</b>		
Are H&S notices kept on file, posted in the facility and in language(s) understood by majority of employees in accordance with applicable standards?	Yes	
<b>6.3 Risk Assessment</b>		
Does the facility conduct H&S risk assessments in accordance with applicable standards?	Yes	
<b>6.4 Risk Management</b>		
Does the facility maintain management plans to mitigate or respond to H&S risks in accordance with applicable standards?	Yes	
<b>6.5 Governance</b>		
Does the facility have personnel responsible for management of H&S policies and procedures in accordance with applicable standards?	Yes	
Does the facility have an H&S committee that operates and documents activities in accordance with applicable standards?	Yes  Safety committee meets once a month.	
<b>6.6 Education</b>		
What health and safety trainings does the facility provide its employees and how often are they conducted?	Respiratory training, CPR Training, Fire Drills, Lockout Tagout training, Hazardous Communication, Good Manufacturing Practices systems, fire extinguishers.	
<b>6.7 Emergency</b>		
How many fire extinguishers reported by facility in assessed production or distribution area?	37	
Are fire extinguishers present and maintained in accordance with applicable standards?	<p><b>No</b></p> <p>1.) At the time of the facility tour, it was noted that fire extinguishers are not being inspected on a monthly basis.</p> <p>29 CFR (2002) § 1910.157(e)(2)</p>	

## Social Compliance Assessment Report

	<p>2.) The fire extinguisher sign was indicating a fire extinguisher, however, no fire extinguisher was present.</p> <p>29 CFR (2002) § 1910.157(c)(1)</p> <p><b>Note:</b> During the process of the audit, the fire extinguisher sign was removed from the wall by management.</p>
Are emergency alarms present, maintained and detectable by employees in accordance with applicable standards?	Yes
Are secondary emergency exits present and located in accordance with applicable standards?	Yes
Are emergency exits maintained in accordance with applicable standards?	<p>No</p> <p>No exit signs in the following areas of work; four color printing room, clean room in building 3 and in the warehouse located in building 1.</p> <p>8 C.C.R (2009) § 3216</p> <p><b>Note:</b> During the process of the audit, management was able to place emergency "EXIT" signs in the locations that were missing emergency exit signs.</p>
Are emergency exit pathways present and maintained in accordance with applicable standards?	<p>No</p> <p>During the time of the facility tour, the auditor observed no directional signage to guide employees to the nearest exit in building 1 and in building 2.</p> <p>29 CFR (2002) § 1910.37(b)(4)</p> <p><b>Note:</b> At the time of the process of the audit, management went ahead and place directional signage in the areas that were missing guidance to the nearest exit route.</p>
Are evacuation plans present, posted and maintained in accordance with applicable standards?	Yes
Are emergency assembly points present and maintained in accordance with applicable standards?	Yes
Is emergency lighting present and maintained in accordance with applicable standards?	<p>No</p> <p>No emergency lighting was present in the 2nd building.</p>

## Social Compliance Assessment Report

	8 C.C.R (2009) § 3317
Are evacuation drills conducted and documented in accordance with applicable standards?	Yes
<b>6.8 First aid</b>	
Does the facility provide first aid equipment and is the observed equipment, designated, accessible and maintained in accordance with applicable standards?	Yes
Are employees trained and available to administer first aid procedures in accordance with applicable standards?	Yes
Does the facility have staff available to administer medical care in accordance with applicable standards?	N/A
Does the facility provide a clinic and maintain medical records in accordance with applicable standards?	N/A
Do employees undergo medical tests related to the job function and are records of medical tests maintained in accordance with applicable standards?	N/A
Does the facility manage medical waste in accordance with applicable standards?	N/A
<b>6.9 Accident</b>	
Does the facility maintain records of employee accidents (e.g. injury, death) and facility accidents (e.g. equipment malfunction) in accordance with applicable standards?	Yes
Does the facility investigate, address and report employee and facility accidents in accordance with applicable standards?	Yes
Has the facility been free of fatalities and accidents that have resulted in loss of a body part in the past 12 months?	Yes
<b>6.10 Personal Protective Equipment</b>	
Has the facility established a policy/ code governing personal protective equipment identification, use, maintenance and training?	Yes
Does the facility communicate and train employees (all levels) on the facility's personal protective equipment policy in accordance with applicable standards?	Yes
Are employees using the designated personal protective equipment in accordance with applicable standards?	Yes

## Social Compliance Assessment Report

Does the facility maintain the designated personal protective equipment in accordance with applicable standards?	Yes
<b>6.11 Chemicals and Hazardous Materials</b>	
The facility does not use or maintain (store) chemicals or hazardous materials on site.	No
Has the facility established a policy/ code governing chemicals and hazardous materials identification, use, maintenance and training in accordance with applicable standards?	Yes
Does the facility communicate and train employees (all levels) on the facility's chemicals and hazardous materials policy in accordance with applicable standards?	Yes
Are employees handling the chemicals and hazardous materials at the facility in accordance with applicable standards?	Yes
Are materials labeled as hazardous, combustible or flammable and stored in accordance with applicable standards?	Yes
Does the facility dispose of chemicals and hazardous materials in accordance with applicable standards?	Yes
Does the facility maintain an inventory of chemicals and hazardous materials in accordance with applicable standards?	Yes
Does the facility maintain safety data sheets of chemicals and hazardous materials in accordance with applicable standards?	Yes
<b>6.12 Equipment Safety</b>	
Has the facility established a policy/ code governing equipment safety identification and maintenance in accordance with applicable standards?	Yes
Does the facility communicate and train employees (all levels) on the facility's equipment safety policy in accordance with applicable standards?	Yes
Does the facility maintain the designated equipment safety mechanisms in accordance with applicable standards?	Yes
Is observed equipment at the facility operating and equipped with safety mechanisms in accordance with applicable standards?	Yes

## Social Compliance Assessment Report

<b>6.13 Electrical</b>	
Are electrical panels, wiring and outlets maintained in accordance with applicable standards?	Yes
<b>6.14 Noise</b>	
Are noise levels monitored in accordance with applicable standards?	Yes
<b>6.15 Lighting</b>	
Does the facility provide access to and maintain workplace illumination in accordance with applicable standards?	Yes
<b>6.16 Ventilation and Temperatures</b>	
Does the facility maintain windows or ventilation systems in the work environment in accordance with applicable standards?	Yes
<b>6.17 Potable Water</b>	
Do employees have unlimited and free access to potable water?	Yes
<b>6.18 Sanitation</b>	
Is general housekeeping maintained in accordance with applicable standards?	Yes
Do employees have unlimited and free access to toilet facilities?	Yes
In observed areas, does the facility have sanitary and maintained restroom/ shower facilities in accordance with applicable standards?	Yes
<b>6.19 Food Preparation/ Canteen</b>	
Is the food preparation area/ canteen operated and maintained in accordance with applicable standards?	Yes
<b>6.20 Child Care</b>	
Is child care facility located and maintained in accordance with applicable standards?	Yes
Is the facility workforce free of individuals under the age of 18 who are not employed by the facility?	Yes
<b>6.21 Dormitory</b>	
The facility does not provide accommodation for employees.	Yes

## Social Compliance Assessment Report

Are fire extinguishers present in the dormitory and maintained in accordance with applicable standards?	No dormitory present
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### 6.22 Other Practices

Are other H&S practices in accordance with applicable standards?	<p><b>No</b></p> <p>1a.) 2 eyewash stations were not available where there were signs indicating nearby eyewash stations.</p> <p>1b.) The eyewash bottle located inside the restroom was empty.</p> <p>29 CFR (2005) § 1910.151(c)</p> <p>2.) 2015 Labor Notice Poster was not filled out.</p> <p>Cal. Labor Code (2009), Sec. 207</p> <p>Note: During the process of the audit, management went ahead and removed the eyewash signs and place them in the corresponding location where the actual eyewash station was located. The eyewash bottle that was empty inside the restroom was removed by management.</p> <p><b>Note:</b> The 2015 Labor Notice poster was filled out during the process of the audit.</p>
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<b>7. Environment</b>	<b>Total # of Findings: 0</b>
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### 7.1 Licenses/ Permits/ Certifications

Does the facility have a policy or system in place to identify and maintain applicable environmental permits/ licenses/ certifications?	Yes
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### 7.2 Postings

Are environmental notices kept on file, posted in the facility and in language(s) understood by majority of employees?	Yes
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### 7.3 Risk Assessment

Does the facility conduct assessments on environmental risks to employees and the community in accordance with applicable standards?	Yes
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### 7.4 Risk Management

Does the facility maintain management plans related to those environmental risks to reduce or respond to environmental impacts to land, water, and air in accordance with applicable standards?	Yes
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## Social Compliance Assessment Report

7.5 Education	
What environmental trainings does the facility provide its employees and how often are they conducted?	Employees who work with chemicals go through chemical handling training and the types of chemicals that need to be handle with care so that they are not release into the environment.
7.6 General Waste	
Main types of waste produced at the facility:	Liquid paint
Does the facility maintain an outdoor environment free of uncontrolled refuse?	Yes
Does the facility maintain a waste inventory and tracking system in accordance with applicable standards?	Yes
7.7 Hazardous Waste	
The facility does not appear to generate, report any generation, or attest to any generation of hazardous waste.	No
Has the facility established a policy/ code governing hazardous waste identification, inventory, control and training in accordance with applicable standards?	Yes
Does the facility communicate and train employees (all levels) on the facility's hazardous waste policy in accordance with applicable standards?	Yes
Does the facility separate hazardous waste from regular waste in accordance with applicable standards?	Yes
Does the facility prevent the direct discharge of hazardous waste into the environment?	Yes
Does the facility maintain an inventory of hazardous waste in accordance with applicable standards?	Yes
7.8 Air Emissions	
The facility does not appear to generate, report any generation, or attest to any generation of air emissions.	Yes
7.9 Waste Water	
The facility does not appear to generate, report any generation, or attest to any generation of waste water.	Yes

## Social Compliance Assessment Report

	Environmental Department of Public works L.A Sanitation Wastewater Permit Permit No.: 458306 District 6
<b>7.10 Noise Pollution</b>	
The facility does not appear to generate, report any generation, or attest to any generation of ambient noise.	Yes
<b>7.11 Other Practices</b>	
Are other practices related to environmental impact in accordance with applicable standards?	Yes
<b>8. Ethics &amp; Business Integrity</b> <span style="float: right;"><b>Total # of Findings: 0</b></span>	
<b>8.1 UL Integrity</b>	
How many times has any member of the UL assessment team been to this facility for an assessment?	First time
Was the UL Statement of Integrity accepted and signed?	Yes
By whom was the UL Statement Integrity signed?	Eddie Blau
<b>8.2 Bribery Attempt</b>	
Was the assessment free of any bribery attempt?	Yes
<b>8.3 Bribery and Facilitation Payments</b>	
Has the facility established a policy/ code governing bribery and facilitation payments in accordance with applicable standards?	Yes
Are employees who refuse to participate in bribery or facilitation payments supported by the facility and are employees aware that they will not suffer demotion, penalty or other adverse consequences for voicing a concern, or for refusing to pay a bribe or facilitation payment even if this action may result in the enterprise losing business?	Yes



9. Pictures

Nil



Building #1



Building #2



Building #3



Building #4