



FINAL REPORT REGARDING UNDERGROUND PRINTING MAY 19, 2014

On August 22, 2013, the Fair Labor Association (FLA) received a Third Party Complaint from an individual who elected to remain anonymous regarding a facility operated by Underground Printing, a Category C Licensee of the FLA. The facility is located in Ann Arbor, Michigan. The Third Party Complaint alleged noncompliances with Compliance Benchmarks related to the Employment Relationship, Safety and Health, Hours of Work and Compensation elements of the FLA Workplace Code of Conduct.

The FLA accepted the Third Party Complaint at Step 2 of Third Party Complaint process on September 26, 2013, and so informed Underground Printing management and the complainant. On November 18, 2013, company management provided the FLA with an assessment of the allegations and a draft remediation plan. The company provided a second assessment and a more elaborate remediation plan on January 17, 2014.

The FLA commissioned consultant Miriam Rodriguez to conduct an independent assessment of the facility to verify the action items Underground Printing had indicated had been completed and others still in progress. Ms. Rodriguez conducted the independent verification from March 31 to April 3, 2014, and submitted a final report to the FLA on April 27. The full verification report is available at www.fairlabor.org/report/underground-printing-united-states.

The independent verifier found that Underground Printing made progress in remediating noncompliances related to the Employment Relationship, Hours of Work and Compensation code elements. Remediation with respect to Safety and Health issues lagged, however, with significant work remaining with respect to training of workers on safety and health, proper disposal of waste products, establishment of a Safety and Health Committee, and immediate planning and execution of fire drills. The FLA expects that Underground Printing will report at least quarterly on the status and progress of the outstanding remediation items, particularly those in the Safety and Health area. The FLA will review the reports and decide whether an additional verification of the implementation of the action plan is warranted.