FAIR LABOR ASSOCIATION

June 2011

Enhancing the FLA Workplace Code of Conduct and Compliance Benchmarks

The FLA Workplace Code of Conduct, developed by the Apparel Industry Partnership and issued in April 1997, is based on international labor standards, primarily Conventions of the International Labor Organization (ILO). The Code consists of ten broad elements and a network of more than 140 specific compliance benchmarks that were developed subsequent to the Code and were last revised in 2006. The FLA Workplace Code of Conduct has served the organization well for the last ten years. However, the FLA Board, staff and stakeholders recognized that it was time to review and revise the Code to reflect the lessons learned from its implementation in thousands of factories around the globe.

At its February 2008 meeting, the FLA Board of Directors created a committee to spearhead a review of the Code of Conduct and Compliance Benchmarks and make recommendations to the Board regarding revisions and amendments. The Working Group consisted of three members, one representing each of FLA's three constituencies—colleges and universities, companies, and nonprofit organizations.[1] The working group then collaborated with their respective caucuses to develop recommendations and guidelines for each Code element.

The 2011 FLA Workplace Code of Conduct strengthens protections for workers' rights. The complete package—consisting of a Preamble, ten code elements, compliance benchmarks, and a glossary of terms—was approved by the Board of Directors in June 2011, and is available here. Selected enhancements in labor protections and a side-by-side comparison of the entire Code and Compliance Benchmarks are included below.

How the 2011 FLA Workplace Code of Conduct and Compliance Benchmarks[2] Strengthens Protection of Workers' Rights

PREAMBLE

- A new preamble to the Code states that the FLA Workplace Code of Conduct defines labor standards that aim to achieve decent and humane working conditions. The preamble also sets out compliance expectations by affiliated companies and the requirement to remediate noncompliances in a sustainable manner.

- The preamble also states that as an organization that promotes continuous improvement, 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

- This new Code element requires employers to 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.

- New benchmarks require workplaces to have in place policies and procedures related to general human resource management and to specific management functions organized along the employment lifecycle, including recruitment and hiring, terms and conditions of employment, administration of compensation, fringe

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benefits and hours of work, industrial relations, work rules and discipline, skills development, health, safety and environmental management, and termination and retrenchment.

- New benchmarks place greater emphasis on recruitment and hiring processes, including when employment agencies are used, to ensure better protections for workers.

- The new Code emphasizes employment and workplace protections for precarious workers, particularly migrant, contract and contingent workers.

NON-DISCRIMINATION

- Several benchmarks were amended to make it explicit that, if not provided by law, employers must provide protection to workers who allege discrimination.

- A benchmark on medical examinations was amended to clarify that medical examinations for fitness are limited to the fitness requirements of the position held.

- A benchmark on gender-based wage discrimination was amended to cover all forms of compensation discrimination. The benchmark emphasizes equal pay for equal work.

HARASSMENT OR ABUSE

- A new benchmark explicitly bans the use or threat of psychological abuse, such as forcing workers to sign letters of self-criticism or posting names of workers subject to disciplinary measures, as a means to maintain labor discipline.

- An existing benchmark on requirement by employer to ensure that the workplace is free from violence, harassment or abuse was amended to make it explicit that, if not provided by law, employers must provide protection to workers who allege harassment or abuse violations.

FORCED LABOR

- This Code element categorically bans the use of all forms of forced labor. Consistent with this enhanced rejection of the use of forced labor, a benchmark that allowed prison labor (under certain narrow circumstances) has been eliminated.

- New benchmarks on freedom of movement require that workers have free egress from workplaces at all times and clearly state that employment terms shall not confine or restrict employees' freedom of movement.

CHILD LABOR

- This Code element sets the minimum age for employment at the higher of 15 years or the age for completion of compulsory education. It eliminates the possibility of employment at age 14 (under certain circumstances) that was contemplated by the 1997 Code.

- Consistent with the Code element change, minimum age for apprenticeship and for vocational training in benchmarks is also set at the highest of 15 years or the age for completion of compulsory education.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

- A new benchmark sets forth that when the right to freedom of association and collective bargaining is restricted under law, employers shall not obstruct alternative legal means of worker association.

- A revised benchmark on the right to strike sets out that employers shall not impose any sanction on workers organizing or having participated in a legal strike.

HEALTH, SAFETY AND ENVIRONMENT

- An existing code element on health and safety was expanded to include the environment. This Code

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element calls on employers to adopt responsible measures to mitigate negative impacts that the workplace has on the environment.

- As appropriate, former health and safety benchmarks were also expanded to include environmental issues. For example, a benchmark on evacuation requirements and procedures was expanded to require evacuation emergency plans to include procedures for notifying local community authorities in case of accidental discharge or release of chemical/waste products or any other environmental emergency.

- A new benchmark sets out that workers shall not suffer any negative consequences for refusing to work with unguarded or unsafe machinery, equipment or tools.

- One benchmark was modified and an additional benchmark added to enhance protection of workers in employer-provided dormitories.

HOURS OF WORK

- A new Code element sets a limit for regular weekly hours of work of 48 hours, with at least 24 consecutive hours of rest in every seven-day period and the requirement that all overtime work shall be consensual. It also sets forth that overtime shall not be requested regularly and be compensated at a premium rate. Other than in exceptional circumstances (see below under Glossary of Terms), the sum of regular and overtime hours in a week shall not exceed 60 hours.

- In addition to setting a limit on overtime, benchmarks require commitment to progressive reduction of overtime.

COMPENSATION

- This new Code element covers wages, benefits and overtime compensation. It establishes that every worker has a right to compensation for a regular work week that is sufficient to meet the 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.

- This Code element also requires employers, working with FLA, to take appropriate actions that seek to progressively realize a level of compensation that meets basic needs and provides some discretionary income.

GLOSSARY OF TERMS

- A new glossary is included to define key terms referenced in the Code.

- "Extraordinary business circumstances," under which some exceptions in the implementation of the 1997 Code were permitted, was deleted from the 2011 Code and replaced with the narrower concept of exceptional circumstances. The new definition sets forth that peak production periods, which can be planned for, or holidays or seasonal fluctuations, are not exceptional circumstances.

End Notes

[1] The members of the Board appointed to the Working Group were Linda Golodner from the NGO Caucus, Carol Kaesebier from the University Caucus, and Gregg Nebel from the Industry Caucus (since renamed Business Caucus). In June 2009, Karen Daubert replaced Kaesebier representing the University Caucus.

[2] Comparison with 1997 FLA Workplace Code of Conduct and 2006 Compliance Benchmarks.

Code of Conduct and Compliance Benchmarks, Side-by-Side Comparison

CODE OF CONDUCT

1997 VERSION	STATUS	2011 REVISION
	NEW	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.
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.	SAME	NONDISCRIMINATION No person shall be subject to any discrimination in employment, including hiring, compensation, advancement, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, social group or ethnic origin.
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.	SAME	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.
FORCED LABOR There shall not be any use of forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise.	AMENDED	FORCED LABOR There shall be no use of forced labor, including prison labor, indentured labor, bonded labor or other forms of forced labor.
CHILD LABOR No person shall be employed at an age younger than 15 (or 14 where the law of the country of manufacture allows*) or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15.	AMENDED	CHILD LABOR No person shall be employed under the age of 15 or under the age for completion of compulsory education, whichever is higher.
FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING Employers shall recognize and respect the right of employees to freedom of association and collective bargaining.	SAME	FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING Employers shall recognize and respect the right of employees to freedom of association and collective bargaining.

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CODE OF CONDUCT

1997 VERSION	STATUS	2011 REVISION
HEALTH AND SAFETY Employers shall provide a safe and healthy working environment to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of employer facilities.	AMENDED	HEALTH, SAFETY, AND ENVIRONMENT 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 as a result of the operation of employers' facilities. Employers shall adopt responsible measures to mitigate negative impacts that the workplace has on the environment.
HOURS OF WORK Except in extraordinary business circumstances, employees shall (i) not be required to work more than the lesser of (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture or, where the laws of such country do not limit the hours of work, the regular work week in such country plus 12 hours overtime and (ii) be entitled to at least one day off in every seven day period.	AMENDED	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 the 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 work 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.
WAGES AND BENEFITS Employers recognize that wages are essential to meeting employees' basic needs. Employers shall pay employees, as a floor, at least the minimum wage required by local law or the prevailing industry wage, whichever is higher, and shall provide legally mandated benefits.	AMENDED	COMPENSATION Every worker has a right to compensation for a regular work week that is sufficient to meet the 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 provide 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.

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CODE OF CONDUCT

1997 VERSION	STATUS	2011 REVISION
OVERTIME COMPENSATION In addition to their compensation for regular hours of work, employees shall be compensated for overtime hours at such premium rate as is legally required in the country of manufacture or, in those countries where such laws do not exist, at a rate at least equal to their regular hourly compensation rate.	MOVED	Hours of Work and Overtime Compensation standards are combined under the revised Hours of Work Code.

COMPLIANCE BENCHMARKS

STATUS	2006 VERSION	2011 REVISION	REVISED BENCHMARK TITLE
		EMPLOYMENT RELATIONSHIP (ER)	
AMENDED	F.9	ER.1	General/Human Resource Management Systems
AMENDED	WBOT.23	ER.2	General/Documentation and Inspection
AMENDED	D.2, D.3	ER.3	Recruitment and Hiring/Employment Decisions
AMENDED	CL.3, CL.4	ER.4	Recruitment and Hiring/Proof of Age Documentation
NEW		ER.5	Recruitment and Hiring/Employment Agency Recruitment Practices
NEW		ER.6	Recruitment and Hiring/Employers Agreement with Employment Agencies
NEW		ER.7	Recruitment and Hiring/General Principles on the Use of Contract, Contingent or Temporary Workers
NEW		ER.8	Recruitment and Hiring/Conditions of Hiring Contract or Temporary Workers
NEW		ER.9	Recruitment and Hiring/Invalid Use of Contract, Contingent or Temporary Workers
AMENDED	F.3, F.4	ER.10	Terms and Conditions/Employment Terms
NEW		ER.11	Terms and Conditions/Contract, Contingent or Temporary Workers
NEW		ER.12	Terms and Conditions/Contract, Contingent or Temporary Worker to Permanent Employee
NEW		ER.13	Terms and Conditions/Apprenticeship
NEW		ER.14	Terms and Conditions/Other Special Categories of Workers
NEW		ER.15	Terms and Conditions/New Employee Orientation
AMENDED	H&S.6, WBOT.23	ER.16	Terms and Conditions/Communication
NEW		ER.17	Terms and Conditions/Supervisor Training

(Employment Relationship (ER) continues on page 7)

COMPLIANCE BENCHMARKS

STATUS	2006 VERSION	2011 REVISION	REVISED BENCHMARK TITLE
EMPLOYMENT RELATIONSHIP (ER) (continued from page 6)			
AMENDED	WBOT.4, WBOT.17	ER.18	Administration of Compensation/Timing and Completeness
NEW		ER.19	Administration of Compensation/Termination Payouts
	F.6	ER.20	Administration of Compensation/Wage Advances
AMENDED	F.7, WBOT.28	ER.21	Administration of Compensation/Free Disposal of Wages
AMENDED	WBOT.5	ER.22	Administration of Fringe Benefits/Holidays, Leave, Legal Social Benefits and Bonuses
AMENDED	HOW.6	ER.23	Administration of Hours/Time Recording System
AMENDED	WBOT.6	ER.24	Administration of Hours/Production and Incentive Schemes
AMENDED	FOA.26	ER.25	Industrial Relations
NEW	FOA.15	ER.26	Industrial Relations/Right to Organize, Bargain and Participate in Legal Strikes
AMENDED	H&A.2, H&A.3, H&A.4, H&A.5, H&A.6, H&A.7	ER.27	Work Rules and Discipline
NEW		ER.28	Skills Development/Training
NEW		ER.29	Skills Development/Management of Performance Reviews
NEW		ER.30	Skills Development/Promotion, Demotion and Job Reassignment
AMENDED	H&S.3, H&S.5	ER.31	Health, Safety, and Environmental Management System/Policies and Procedures
NEW		ER.32	Termination and Retrenchment/General Policies and Procedures
NONDISCRIMINATION (ND)			
	D.1	ND.1	General Compliance Nondiscrimination
AMENDED	D.3	ND.2	Recruitment and Employment Practices/Job Advertisements, Job Descriptions and Evaluation Policies
AMENDED	D.4	ND.3	Compensation Discrimination
AMENDED	D.5	ND.4	Marital Discrimination
AMENDED	D.6	ND.5	Pregnancy Testing
AMENDED	D.7	ND.6	Marriage or Pregnancy Discrimination
AMENDED	D.8	ND.7	Pregnancy and Employment Status
AMENDED	D.9	ND.8	Protection and Accommodation of Pregnant Workers and New Mothers
AMENDED	D.10	ND.9	Health-Related Discrimination

(Nondiscrimination (ND) continues on page 8)

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COMPLIANCE BENCHMARKS

STATUS	2006 VERSION	2011 REVISION	REVISED BENCHMARK TITLE
		NONDISCRIMINATION (ND) (continued from page 7)	
AMENDED	D.11	ND.10	Medical Examination
AMENDED	D.12	ND.11	Confidentiality of Health Status
AMENDED	D.13	ND.12	Reasonable Accommodation for Health Reasons
REMOVED	D.14		
		HARASSMENT OR ABUSE (H/A)	
	H&A.1	H/A.1	General Compliance Harassment or Abuse
AMENDED	H&A.8	H/A.2	Discipline/Monetary Fines and Penalties
	H&A.9	H/A.3	Discipline/Access to Facilities
	H&A.10	H/A.4	Discipline/Physical Abuse
	H&A.11	H/A.5	Discipline/Verbal Abuse
NEW		H/A.6	Discipline/Psychological Abuse
AMENDED	H&A.12	H/A.7	Discipline/Freedom of Movement
AMENDED	H&A.13	H/A.8	Violence/Harassment or Abuse
AMENDED	H&A.14	H/A.9	Sexual Harassment
AMENDED	H&A.15	H/A.10	Security Practices/Body Searches
AMENDED	H&A.16	H/A.11	Punishment of Abusive Workers/Supervisors/Managers/Workers
		FORCED LABOR (F)	
AMENDED	F.1	F.1	General Compliance Forced Labor
	F.2	F.2	
	F.5	F.3	Debt/Bonded Labor
REMOVED	F.8		
AMENDED	F.10	F.4	Freedom of Movement
AMENDED	F.11	F.5	Employer Controlled Residence
	F.12	F.6	Freedom of Movement/Employer Controlled Residence
	F.13	F.7	Freedom of Movement/Workers Ability to Terminate
AMENDED	F.14	F.8	Forced Overtime
AMENDED	F.15	F.9	Personal Workers Identification and Other Documents
AMENDED	F.16	F.10	Storage for Employee Documents
REMOVED	F.17		

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COMPLIANCE BENCHMARKS

STATUS	2006 VERSION	2011 REVISION	REVISED BENCHMARK TITLE
		CHILD LABOR (CL)	
	CL.1	CL.1	General Compliance Child Labor
AMENDED	CL.2	CL.2	Child Labor
	CL.5	CL.3	Government Permits and Parental Consent Documentation
	CL.6	CL.4	Employment of Young Workers
	CL.7	CL.5	Hazardous Work for Young Workers
	CL.6	CL.6	
AMENDED	CL.9	CL.7	Apprenticeships and Vocational Training/Minimum Working Age
AMENDED	CL.10	CL.8	Apprenticeships and Vocational Training/Legal Compliance
		FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING (FOA)	
	FOA.1	FOA.1	General Compliance Freedom of Association
AMENDED	FOA.2	FOA.2	Right to Freely Associate
NEW		FOA.3	Legal Restriction/Alternative Means
AMENDED	FOA.10	FOA.4	Anti-Union Violence/Harassment or Abuse
	FOA.12	FOA.5	Anti-Union Discrimination/Dismissal, Other Loss of Rights, and Blacklisting
	FOA.27	FOA.6	Restoration of Workers Rights/Reinstatement
AMENDED	FOA.13	FOA.7	Protection of Union Representatives
AMENDED	FOA.9	FOA.8	Production Shift/Workplace Closure
	FOA.14	FOA.9	Severance Pay
AMENDED	FOA.3	FOA.10	Employer Interference
	FOA.5	FOA.11	Employer Interference/Constitution, Elections, Administration, Activities and Programs
	FOA.6	FOA.12	Employer Interference/Registration
AMENDED	FOA.7, FOA.8	FOA.13	Employer Interference/Favoritism
	FOA.11	FOA.14	Employer Interference/Police and Military Forces
	FOA.25	FOA.15	Facilities for Worker Representatives
AMENDED	FOA.18, FOA.19	FOA.16	Right to Collective Bargaining/Good Faith
	FOA.20	FOA.17	Right to Collective Bargaining/Exclusive Bargaining and Other Recognized Unions
	FOA.21	FOA.18	Right to Collective Bargaining/Unorganized Workers

(Freedom of Association and Collective Bargaining (FOA) continues on page 10)

COMPLIANCE BENCHMARKS

STATUS	2006 VERSION	2011 REVISION	REVISED BENCHMARK TITLE
FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING (FOA) (continued from page 9)			
	FOA.22	FOA.19	Right to Collective Bargaining/Compliance with Collective Bargaining Agreement
	FOA.23	FOA.20	Right to Collective Bargaining/Validity of Collective Bargaining Agreement
	FOA.24	FOA.21	Rights of Minority Unions and their Members
	FOA.16	FOA.22	Right to Strike/Sanction for Organizing or Participating in Legal Strikes
	FOA.17	FOA.23	Right to Strike/Replacement Workers
	FOA.4	FOA.24	Deduction of Union Dues and Other Fees
HEALTH, SAFETY, AND ENVIRONMENT (HSE)			
AMENDED	H&S.1	HSE.1	General Compliance Health, Safety, and Environment
AMENDED	H&S.2	HSE.2	Document Maintenance/Workers Accessibility and Awareness
AMENDED	H&S.7	HSE.3	Notification and Record Maintenance
AMENDED	H&S.8	HSE.4	Permits and Certificates
AMENDED	H&S.9	HSE.5	Evacuation Requirements and Procedure
AMENDED	H&S.10	HSE.6	Safety Equipment and First Aid Training
AMENDED	H&S.11	HSE.7	Personal Protective Equipment
AMENDED	H&S.12	HSE.8	Use of Personal Protective Equipment
AMENDED	H&S.13	HSE.9	Chemical Management and Training
AMENDED	H&S.14	HSE.10	Material Safety Data Sheets/Workers Access and Awareness
AMENDED	H&S.15	HSE.11	Chemical Management/Pregnant Women and Young Workers
AMENDED	H&S.16	HSE.12	Protection Reproductive Health
AMENDED	H&S.17	HSE.13	Ventilation/Electrical/Facility Installation and Maintenance
AMENDED	H&S.18	HSE.14	Machinery Safety, Maintenance and Workers Training
AMENDED	H&S.19	HSE.15	Proper Use of Machinery
AMENDED	H&S.19	HSE.16	Workers Refusal to Use Unguarded or Unsafe Machinery
AMENDED	H&S.20	HSE.17	Ergonomics
AMENDED	H&S.21	HSE.18	Medical Facilities
AMENDED	H&S.22	HSE.19	Sanitation in Workplace Facilities
AMENDED	H&S.23	HSE.20	Toilets

(Health, Safety, and Environment (HSE) continues on page 11)

COMPLIANCE BENCHMARKS

STATUS	2006 VERSION	2011 REVISION	REVISED BENCHMARK TITLE
HEALTH, SAFETY, AND ENVIRONMENT (HSE) (continued from page 10)			
AMENDED	H&S.24	HSE.21	Toilets/Restrictions
AMENDED	H&S.25	HSE.22	Food Preparation
AMENDED	H&S.26	HSE.23	Drinking Water
AMENDED	H&S.27	HSE.24	Drinking Water/Restrictions
AMENDED	H&S.28	HSE.25	Dormitory Facilities
NEW		HSE.26	Dormitories Separate From Production Facilities
	CL.11, CL.12	HSE.27	Childcare Facilities/Children on Premises
HOURS OF WORK (HOW)			
AMENDED	HOW.1	HOW.1	General Compliance Hours of Work
AMENDED	HOW.2	HOW.2	Rest Day
	HOW.3	HOW.3	Meal and Rest Breaks
AMENDED	HOW.4	HOW.4	Protected Workers (Women and Young Workers)/Regulations on Hours of Work
	HOW.5	HOW.5	Protected Workers (Women and Young Workers)/Record Keeping
	HOW.7	HOW.6	Maintenance of Reasonable Levels of Staff
AMENDED	HOW.10	HOW.7	Overtime/Calculation over Period Longer than One Week
AMENDED	HOW.8, HOW.11	HOW.8	Forced Overtime/Exceptional Circumstances
AMENDED	HOW.12	HOW.9	Exceptional Circumstance/Overtime Explanation
	HOW.13	HOW.10	Public Holidays
	HOW.14	HOW.11	Annual Leave
	HOW.15	HOW.12	Annual Leave/Determination
AMENDED	HOW.16	HOW.13	Annual Leave/Restrictions
	HOW.18	HOW.14	Annual Leave/Wage Payments
	HOW.17	HOW.15	Leave/Retaliation
	HOW.19	HOW.16	Sick Leave
	HOW.20	HOW.17	Sick Leave/Restrictions
	HOW.21	HOW.18	Calculation of Absences
	HOW.22	HOW.19	Suspension of Work

COMPLIANCE BENCHMARKS

STATUS	2006 VERSION	2011 REVISION	REVISED BENCHMARK TITLE
		COMPENSATION (C)	
AMENDED	WBOT.1	C.1	General Compliance Compensation
AMENDED	WBOT.2	C.2	Minimum Wage
AMENDED	WBOT.3	C.3	Training and Probation Wage
AMENDED	WBOT.4	C.4	Timely Payment of Wages
AMENDED	WBOT.17	C.5	Accurate Calculation, Recording, and Payment of Wage
AMENDED	WBOT.18	C.6	Accurate Length of Service Calculation
AMENDED	WBOT. 6, WBOT. 7, WBOT. 8, WBOT.10, WBOT.12	C.7	Calculation Basis for Overtime Payments
AMENDED	WBOT.11	C.8	Overtime Wage Awareness
	WBOT.9	C.9	Nonpayment of Incentives
	WBOT.13	C.10	Deposit of Legally Mandated Deductions
	WBOT.14	C.11	Voluntary Wage Deductions
	WBOT.15	C.12	Voluntary Wage Deduction/Workers Access to Information
AMENDED	WBOT.26	C.13	Pay Statement
	WBOT.27	C.14	Compensation Receipt
	WBOT.21	C.15	Record Maintenance
	WBOT.19	C.16	False Payroll Records
AMENDED	HOW.9, WBOT.22, WBOT.24	C.17	Workers Awareness and Understanding of Compensation
AMENDED	WBOT.16	C.18	Employer Provided Fringe Benefits
AMENDED	WBOT.24	C.19	Compensation Disputes
NEW		GLOSSARY OF TERMS	