



# The Equitable Food Initiative FLC Certification Standards, Guidance, & Interpretations

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## Responsibility for these Requirements

The EFI Standards Committee has responsibility for this document and will periodically review and update it. Users should verify that they are using the latest version by checking on the EFI website at: [www.equitablefood.org](http://www.equitablefood.org).

## Versions Issued

Version No.	Date	Description of Amendment
1.0	November 1 <sup>st</sup> , 2021	First public-facing version.

## About the Equitable Food Initiative (EFI)

EFI is a non-profit skill-building and certification organization that brings growers, farm labor contractors (FLCs), farmworkers, retailers, and consumers together to create a safer, more equitable food system. This unique approach sets standards for labor practices, food safety and pest management while engaging workers at all levels to address issues and challenges in the produce industry.

## Our Mission Statement

To bring together growers, farmworkers, retailers and consumers to transform agriculture and the lives of farmworkers.

## We Believe:

- That being a farmworker is a valuable and honorable profession.
- The skills and contributions of farmworkers create a healthier work environment and produce safer food.
- The future of agriculture lies within the collaboration among growers, labor providers, farmworkers, retailers and consumers.
- By transforming agriculture, we will transform lives.

## Introduction

The purposes of the EFI FLC Certification Standards, Guidance, and Interpretations [this document] are:

1. To provide standards and indicators that must be conformed to in order to participate in the FLC Certification Program and become an EFI-Verified FLC;
2. To provide guidance and interpretations for auditors, farm labor contractors (FLCs), growers, and Leadership Teams (LTs) on each indicator in order to add clarity to the required performance thresholds and to increase the quality and consistency of the auditing and certifying process; and
3. To provide transparency so the EFI FLC Certification Program has credibility with stakeholders.

## Scope

In the context of this document and the EFI FLC Certification Program, a Farm Labor Contractor (FLC) is defined as “a legal entity who recruits, manages, and directly supervises workers on behalf of a client engaged in the production of fresh produce”. This document covers the requirements of the EFI FLC Certification Program that have direct impact on how conformity to the EFI FLC Certification Standards is determined through the auditing and certifying process.

## Glossary

The following is a brief glossary of terms used throughout the FLC Certification Standard:

**Applicable crew(s):** Groups of workers that are included in scope for certification visits and are required to include LT Crew member(s)

**Applicable worksite(s):** Worksite(s) that are in scope for certification visits and are required to include LT Crew member(s)

**CB:** Certifying Body

**Client:** A legal entity engaged in the farming of fresh produce who contracts with an FLC

**Crew:** A group of workers deployed to an individual worksite under the direct supervision of the FLC

**Crew LT member:** An individual Leadership Team member that is represented on each applicable crew

**Employees:** Workers hired and directly supervised by the FLC participating in the FLC Certification Program

**Employer:** The FLC participating in the FLC Certification Program.

**RRSC:** The EFI Responsible Recruitment Scorecard

**Farm Labor Contractor (FLC):** A legal entity who recruits, manages, and directly supervises workers on behalf of a client engaged in the production of fresh produce

**Leadership Team (LT):** The Leadership Team functioning within the workforce of the FLC participating in the FLC Certification Program

**LTIs:** Leadership Team interviews

**Management:** Management staff of the FLC that is participating in the FLC Certification Program

**MIs:** Management interviews

**Workers:** Workers hired and directly supervised by the FLC participating in the FLC Certification Program

**Worksite:** Client sites where the FLC participating in the FLC Certification Program sends workers to work

**WIs:** Worker interviews

## **Guidance & Interpretations**

The Guidance & Interpretations in this document are intended to set clear expectations for FLCs, LTs, and auditors about how conformance with an indicator can be met and measured.

## **EFI Requirements and Legal Compliance**

The EFI standards and indicators establish and describe requirements to be carried out by FLCs, as well as other participants in the EFI system, that are in addition to those required by laws and regulations issued by governments. Neither an employer's policy stating that it will comply with laws and regulations nor actual compliance with laws and regulations will constitute proof of compliance with the EFI requirements when those requirements differ from, augment and/or exceed those in laws and regulations. Thus, under the EFI system, employers are required to comply with applicable laws and regulations regarding terms of employment, but, in addition, are required to comply with terms of employment which may augment and/or exceed what is required by laws and regulations. Consequently, for example, an audit under the EFI system may conclude that an employer complied with what is required by state or federal law, but may conclude that the employer is out of conformance with the EFI's requirements and such nonconformance must be corrected. Accordingly, the approval, implementation and verification of corrective action plans will be based on a labor provider's compliance with EFI requirements and not merely on compliance with, or policies that are consistent with laws and regulations.

EFI is a voluntary system that is in part an effort to prevent conflicts among stakeholders and to provide effective tools, structures, and training so that stakeholders can resolve disputes amicably and to their mutual

satisfaction. The EFI FLC Certification standards are not intended to provide any of the participating entities or persons with any additional rights under law that are not currently afforded under the law.

These standards apply solely to the workers under direct employment and management of the labor provider seeking or holding certification.

Section 1. Cross Sectional Standards		Guidance and Interpretations
Labor Employer Collaboration (FLC-LEC)		
Standard FLC-LEC-1 A Leadership Team has been established for workers and management to share responsibility for compliance with the EFI FLC Certification Standards and contribute to the overall success of the organization, across all in-scope sites where workers are sent and managed. All workers are knowledgeable, trained, and empowered to ensure compliance with the EFI FLC Certification Standards. Leadership Team members are represented across applicable crews and the entire workforce has access to communicate with them.		
FLC-LEC 1.1	A Leadership Team has been trained under the guidance of EFI and has adopted the mission of implementing these Standards. Leadership Team members shall be represented across all applicable crews.	Document review shall demonstrate that at least 50% of the LT are included on a training roster provided by EFI. LTI shall demonstrate that designated members are represented on every applicable crew.
FLC-LEC 1.2	The Leadership Team includes representatives of management, supervisors and workers in non-management positions. Worker representatives shall be representative of all job categories, gender, and specific demographic interests, including indigenous and disabled workers.	LTIs shall demonstrate that the LT includes representation from each significant demographic group within the workforce.
FLC-LEC 1.3	The Leadership Team maintains minutes for each meeting, and distributes these minutes to the entire workforce. Minutes are archived and accessible on request from the formation of the LT, or for two years, whichever is less.	Document review and LTIs shall demonstrate that: 1. Minutes are kept for each LT meeting; 2. Most recent meeting minutes are distributed across the entire workforce and 3. Minutes are archived and accessible.
FLC-LEC 1.4	Members of the Leadership Team are made known to the entire workforce. There is a process in place for all applicable crews to know which Crew LT member is among them.	Document review and WIs shall demonstrate that workers have been informed of whom the Leadership Team members are and whom the Crew LT members are via public posting and/or a virtual channel or worker app that all workers have access to. Wis shall demonstrate that workers are able to correctly identify at least one member of the LT or are able to identify how to find that information.
FLC-LEC 1.5	Within the meeting minutes, the Leadership Team documents any reports about compliance concerns, proposed remedies, and/or status of those remedies received from workers, Crew LT members, supervisors or managers from each applicable worksite and work area.	Document review shall demonstrate that adequate documentation has been made of any identified: 1. Concerns about conformity to these Standards; 2. Status of unresolved action items; and 3. Resolution of action items.
FLC-LEC 1.6	The Leadership Team meets with sufficient regularity to ensure the timely resolution of any issues related to compliance with these Standards.	Document review and LTIs shall demonstrate that the frequency of LT meetings was sufficient for addressing identified issues within a timeframe appropriate to the severity of the risks presented by the issues.

Section 1. Cross Sectional Standards		Guidance and Interpretations
Non-retaliation (FLC-NR)		
Standard FLC-NR-1 There is no retaliation against workers or management representatives for participating in the monitoring, assessment, and enforcement practices required under the EFI FLC Certification Standards or in accordance with local laws.		
FLC-NR 1.1	Written policies and procedures are in place that forbid retaliation as a form of disciplinary action, and are implemented to prevent behavior that is inconsistent with these Standards.	Document review demonstrates existence of this policy. WIs & LTIs shall confirm procedures and practices are aligned with this policy. .
FLC-NR 1.2	No punitive measures are taken in retaliation for participation on the Leadership Team, including being disciplined, reassigned, rescheduled, suspended, or fired.	Document review and LTIs shall demonstrate that there is no evidence of punitive or retaliatory action taken in relation to LT membership.
FLC-NR 1.3	No punitive measures are taken against workers for summoning emergency services or reporting incidents to government agencies.	Document review shall demonstrate such punitive measures are prohibited. WIs shall demonstrate that no punitive measures are taken against workers for summoning emergency services or reporting incidents.
FLC-NR 1.4	No punitive measures are taken against any worker for reporting alleged violations of law to government authorities.	Document review and WIs shall demonstrate that workers have not had punitive measures taken against them in accordance with this requirement.
FLC-NR 1.5	No punitive measures are taken against any worker for seeking medical or legal assistance.	Document review and WIs shall demonstrate that workers have not had punitive measures taken against them in accordance with this requirement.
FLC-NR 1.6	No punitive measures are taken against any worker for joining or supporting a political party of his/her choice, or participating in community organizations, so long as it does not disrupt work operations.	Document review and WIs shall demonstrate that workers have not had punitive measures taken against them in accordance with this requirement.

## Compliance with Law (FLC-CL)

Standard FLC-CL-1 Employer complies with national, state, and local laws regarding the hiring and management of employees.



<b>Section 1. Cross Sectional Standards</b>		<b>Guidance and Interpretations</b>
FLC-CL 1.1	Employer complies with national, state, and local laws regarding the following: 1. Labor relations and employment, including but not limited to Social Security insurance, unemployment compensation, state and federal wage-hour laws, state agricultural labor relations laws, anti-discrimination laws, farm labor contractor laws, and, when applicable, housing and transportation safety requirements; 2. A business license, and 3. Food safety laws and regulations in the country of production and the country of intended distribution.	Document review of the Employer Attestation shall demonstrate that the operation is in compliance with the law; this must include specific references to transportation laws and regulations required of FLCs.  Any allegations or findings of violations of law by the employer since the Declaration of Audit Readiness have been documented and the current status or resolution of each allegation or finding has been provided in writing to the auditor.  The review shall demonstrate that frequent and/or significant illegal activity in areas covered by these Standards has not taken place.
FLC-CL 1.2	When a federal, state, or local agency of government, or a court, issues a decision or recommendation finding violation of laws or regulations, the employer provides prompt notice to EFI, including a copy of the relevant documents.	Document review of records sent to EFI by the employer concerning legal compliance shall demonstrate that all decisions and findings pertaining to a violation of laws or regulations has been provided to EFI.
FLC-CL 1.3	Bribery is strictly prohibited.	Document review shall demonstrate that engaging in bribery is prohibited.

Section 2. Labor Standards		Guidance and Interpretations
Worker Health and Safety (FLC-HS)		
Standard FLC-HS-1 Systems have been established and implemented that provide workers with a safe and healthy work environment and minimize occupational injuries, illnesses, and fatalities.		
FLC-HS 1.1	Management, in collaboration with the Leadership Team, takes responsibility for identifying, reviewing, and resolving worker health and safety issues, including but not limited to first aid, pesticide safety, transportation safety, reducing and responding to heat stress	Document review, MIs and LTIs shall demonstrate that there is a written and implemented policy for identifying, reviewing, and resolving workplace health and safety issues. The policy, and its implementation, shall include collaboration with the LT.
FLC-HS 1.2	There is a trained health and safety lead on each applicable worksite crew who shall act as the primary H&S contact.	Document review, WIs and LTIs shall demonstrate that each applicable worksite crew has at least one health and safety lead who has received sufficient training to fulfill this role. The health and safety lead may be the immediate supervisor or crew leader.
FLC-HS 1.3	All worker safety protocols are communicated to workers. Workers are informed that they can address occupational safety concerns through their supervisors, the health and safety lead, their Crew LT member(s), and/or through the designated virtual communication channel. There is a formal process in place for workers to communicate occupational safety concerns and complaints through these channels. All concerns are recorded and remediation actions are documented.	Document review of occupational safety concern and complaint records and LT Minutes shall demonstrate that worker-generated occupational safety concerns and complaints have been documented across all applicable worksites, analyzed, and acted upon. Document review and WIs shall demonstrate that workers are aware that they can address occupational safety concerns through the designated channels.
FLC-HS 1.4	Records of occupational injuries, illnesses, and deaths are created promptly and maintained. Non-confidential documentation of particular incidents is provided promptly to the Leadership Team following any and all work-related injuries, illnesses, and fatalities.	Document review of the accident log and LT minutes shall demonstrate that non-confidential data regarding all workplace injuries, illnesses, and deaths are provided to the LT with a frequency appropriate to the significance of the event.
FLC-HS 1.5	Rates of occupational injuries, illnesses, and deaths are monitored and analyzed.	Document review shall demonstrate that the numbers, types, and dates of all occupational injuries, illnesses, and deaths are recorded and periodically analyzed to detect any trends and/or issues.

Section 2. Labor Standards		Guidance and Interpretations
Standard FLC-HS-2 Workers are provided, by their employer, adequate equipment to prevent injuries, illness, and deaths.		
FLC-HS 2.1	A process is in place, including provision of equipment, first aid kits, and training as needed, to minimize occupational dangers that pose risk of serious injury, serious illness, or death.	Document review of training materials, training records, LT Minutes, and other documents shall demonstrate that equipment and training have been provided and/or modification of work practices implemented to minimize occupational dangers.  LTIs, WIs and visual observation demonstrate appropriate equipment has been supplied and that first aid kits are well-stocked and accessible.
FLC-HS 2.2	Employers provide workers with equipment and clothing that is appropriate to their tasks and necessary to minimize illnesses and injuries. The equipment and clothes are provided free of charge.	Document review, LTIs and WIs (including PAIs) shall demonstrate that Personal Protective Equipment (PPE) has been provided free of charge to workers.
FLC-HS 2.3	A process is in place to ensure that equipment is properly maintained.	Document review shall demonstrate there is a process in place to review and maintain equipment and replace it when necessary. WIs (including PAIs) and visual observation shall demonstrate that PPE is stored and maintained properly.
Standard FLC-HS-3 The risk of workers' exposure to pesticides is minimized.		
FLC-HS 3.1	Pesticide applications that are performed by FLC workers strictly adhere to all directions specified on the pesticide label, including use of PPE and re-entry intervals for field and enclosed production sites. Employer instructs employees and contracted third-parties to meet this obligation.	Document review shall demonstrate that pesticide application(s) strictly adhere to all directions specified on the pesticide label.  LTIs and WIs confirm that all requirements associated with pesticide application are met.
FLC-HS 3.2	There is a documented procedure in place whereby the employer is informed by the client that all fields where workers perform work are safe for reentry.  For cases where the crew arrives onsite and the assigned field is posted for non-entry, the employer must have a protocol in place to verify with the client pesticide application dates and associated reentry intervals across the applicable work areas. Workers have access to this information and are entering fields in accordance with the re-entry guidance. The employer is responsible for enforcing reentry intervals.	Document review and MI shall demonstrate the employer has a process in place to manage communication with the client about pesticide application and reentry intervals.  Document review and MI shall demonstrate the employer has protocols in place to cross verify pesticide application if necessary. Records requested by the employer and provided by the client shall include information on the date of application, the name of the pesticide/agricultural chemical used, the crop sprayed, the concentration, method, and records on harvesting to demonstrate that the time between application and harvesting respects the required pre-harvest interval.

<b>Section 2. Labor Standards</b>		<b>Guidance and Interpretations</b>
FLC-HS 3.3	Workers are trained upon hire and at least annually about pesticide risks and safety and reentry interval protocols.	Document review shall demonstrate that workers have been trained at least annually on pesticide use and risk reduction.
FLC-HS 3.4	A system is in place for workers to report and employers to track pesticide exposures attributed to pesticide use on a worksite or on a neighboring farm. Management ensures all reports are communicated back to the applicable client.	Document review shall demonstrate the existence of a reporting system for receiving and acting upon reports from workers and neighbors regarding possible exposure to crop protection materials. This reporting channel should include reference of the worksite where the incident has occurred and be reported to the client.
Standard FLC-HS-4 FLC workers handling pesticides follow all required practices to protect themselves and others from pesticide exposure; all required training has taken place; and medical monitoring and response procedures are in place to detect and address excessive exposure.		
FLC-HS 4.1	All PPE specified on the pesticide product label is provided at no cost and is clean and in good repair.	Document review and WIs, visual observation, shall demonstrate that PPE is provided to all those who handle hazardous substances and is maintained and stored properly.
FLC-HS 4.2	Workers use required PPE and follow directions for use.	MIs and WIs shall demonstrate that all workers use PPE in accordance to label instructions when working with or around pesticides.
FLC-HS 4.3	All pesticide mixing and loading conducted by employees occurs in a designated, clean, well-ventilated room or area with accurate and clean measuring equipment.	Document review demonstrates employer has communicated this requirement to all applicable clients. MIs and WIs shall demonstrate that pesticide mixing and loading occurs in a designated, clean, well-ventilated room or area with accurate and clean measuring equipment.
FLC-HS 4.4	When employees are mixing and/or loading pesticides, closed systems are used for mixing or loading pesticides labeled with "DANGER."	Document review demonstrates employer has communicated this requirement to all applicable clients. Observation, MIs and WIs shall demonstrate that closed systems are used for mixing or loading pesticides labeled with "DANGER".
FLC-HS 4.5	Employees handling organophosphate or carbamate pesticides labeled with the signal word "DANGER" or "WARNING" are medically monitored in accordance with the safety protocols of these materials.	Document review, MIs and WIs shall demonstrate that these workers have been medically monitored and test results analyzed and acted upon as required.
Standard FLC-HS-5 Ergonomics protocols are in place and being implemented.		
FLC-HS 5.1	Management, in collaboration with the Leadership Team, develops a Repetitive Motion Injury (RMI) Prevention Plan, covering each job, process or operation, that employees are engaged in across any and all applicable worksites.	Document review of the RMI Prevention Plan shall demonstrate that the employer, in collaboration with the LT, have assessed the RMI risk for all jobs and processes that employees are engaged in and have documented prevention strategies.

Section 2. Labor Standards		Guidance and Interpretations
FLC-HS 5.2	<p>For any repetitive motions that are deemed to pose a risk of RMIs, management, in collaboration with the Leadership Team, develops a work plan to correct the RMI exposure, or, if the exposure cannot be corrected in a timely manner or is not within the control of the management, the exposure is minimized to the extent feasible.</p> <p>Management, in collaboration with the Leadership Team, implements controls, such as job rotation, work pacing, or work breaks to minimize the risk of RMIs.</p>	<p>Document review, WI and LTI shall demonstrate that the RMI Prevention Plan has been implemented at each applicable worksite, and/or is updated consistent with continuous improvement.</p>
FLC-HS 5.3	<p>Workers' RMI training includes an explanation of:</p> <ol style="list-style-type: none"> <li>1. The task evaluation process;</li> <li>2. The exposures which have been associated with RMIs;</li> <li>3. The symptoms and consequences of injuries caused by repetitive motion;</li> <li>4. The importance of reporting symptoms and injuries to the employer;</li> <li>5. The role of the Leadership Team to help minimize RMIs;</li> <li>6. The ability of workers to provide input and suggestions for an RMI Prevention Plan; and</li> <li>7. Methods recommended by the Leadership Team and management to minimize RMIs.</li> </ol>	<p>Document review of training materials and training records, WIs and LTIs shall demonstrate that workers have been trained in accordance with the requirement.</p>
FLC-HS 5.4	<p>Hand-weeding is prohibited unless the employer demonstrates the unsuitability of the use of a long-handled tool or other reasonable alternative means of performing the work.</p> <p>In the limited circumstances for which hand-weeding is required, special rest periods apply and PPE provided.</p>	<p>Document review shall demonstrate that there is a written policy concerning hand weeding that has been implemented.</p>
<p><b>Standard FLC-HS-6 Physical, psychological, and verbal abuse are not tolerated.</b></p>		
FLC-HS 6.1	<p>Employer has implemented policy and procedure which prohibits physically, psychologically, and verbally abusive behavior by workers, supervisors, and managers in the workplace, regardless of whether they are under the employer's control.</p> <p>It is explicitly communicated to all applicable clients that all forms of abuse are prohibited and shall not be tolerated.</p>	<p>Document review and MIs shall demonstrate that there is a written policy that prohibits physically, psychologically, and verbally abusive behavior by workers, supervisors, and managers.</p> <p>Additionally, there is documented communication between the employer and all applicable clients that explicitly prohibits all forms of abuse against employees.</p> <p>WIs shall demonstrate the implementation of this policy.</p>

<b>Section 2. Labor Standards</b>		<b>Guidance and Interpretations</b>
Standard FLC-HS-7 Employer-provided transportation ensures vehicle maintenance and worker safety are well managed and operates in accordance with the law.		
FLC-HS 7.1	Employer has a process in place to ensure drivers meet all legal requirements for transporting workers. Only drivers meeting legal requirements may transport workers.	Document review and MI shall demonstrate that the driver(s) are qualified for transporting workers and meet all requirements designated by law.
FLC-HS 7.2	Employer has a process in place to ensure all vehicles used for worker transportation are properly maintained, inspected and meet all applicable safety standards.	Document review, MI and visual inspection shall demonstrate that a functioning management system for inspecting and maintaining transport vehicles is in place and all vehicles meet legal safety requirements for transportation of workers.
<b>Freedom of Association (FLC-FOA)</b>		
Standard FLC-FOA-1 Employers recognize workers' freedom of association and right to organize.		
FLC-FOA 1.1	Employer maintains a policy on freedom of association. The employer's policy states that: 1. Workers have the right to form, join, or assist labor organizations, to bargain collectively through representatives of their own choosing, and to engage in other concerted activities for the purpose of collective bargaining or other mutual aid or protection, and shall also have the right to refrain from such activities. 2. The employer will not interfere with, restrain, or coerce workers in the exercise of these rights. 3. The employer will not dominate or interfere with the formation or administration of any labor organization.	Document review shall demonstrate that the employer has a written and implemented policy on freedom of association with all required components.
FLC-FOA 1.2	Workers are not discriminated or retaliated against in hiring or tenure of employment, or any term or condition of employment, for engaging in the above-mentioned activities under the freedom of association policy.	Document review and WIs shall demonstrate that workers' rights under the freedom of association policy have not been interfered with or restrained, or that there has not been coercion, discrimination, or retaliation against them in hiring, tenure of employment, or any term or condition of employment, for engaging in the activities covered under the freedom of association policy.
<b>Fair Compensation (FLC-FC)</b>		
Standard FLC-FC-1 Workers are compensated correctly, fairly, and appropriately for all work done for the employer.		



Section 2. Labor Standards		Guidance and Interpretations
FLC-FC 1.1	Workers receive pay at the appropriate rates and according to the regular pay date for all time worked as defined in these standards. Other than lawfully required deductions, no other deductions are made without the written consent of the worker.	Document review and WIs shall demonstrate that: <ol style="list-style-type: none"> <li>Workers have been correctly paid for all time worked, including for training and LT participation.</li> <li>There have been no deductions other than those legally required that have not been authorized in writing by the worker;</li> <li>That all payments are made according to the regular pay date</li> </ol>
FLC-FC 1.2	A process is in place and operating to guarantee that legally required hourly wage rates apply to both work and break time, even when workers are paid by piece rate.	Document review shall demonstrate that a process is in place and operating to guarantee that legally required hourly rates apply to both work and break time, even when workers are paid by piece rate.
FLC-FC 1.3	<p>Upon starting their employment, workers are provided the following information (at a minimum):</p> <ol style="list-style-type: none"> <li>The terms and conditions of employment, including the length of employment, pay rate, regular pay date, the name, address, and telephone number of the employer;</li> <li>The name of the employer for which work is being performed;</li> <li>An accurate description of the piece rate system (if applicable), which includes the definition of a complete piece, identifies all piece rates (including variable piece rates), discloses the system for recording production, and sets forth any productivity requirements; and</li> <li>The name, address, and telephone number of the workers' compensation insurance carrier.</li> </ol> <p>If a worker is recruited in the sending country, these terms and conditions shall be provided at their time of recruitment in a language they can understand and in a written, readable format.</p> <p>These terms and conditions should not be changed without the worker's knowledge or consent.</p>	<p>A document review, MIs and WIs shall demonstrate that for workers have signed and accepted the terms and conditions of employment at the onset of employment and terms are not changed without the signed permission of the workers.</p> <p>WIs demonstrate that if recruited in the sending country, workers have signed and accepted the terms and conditions of employment at the time of recruitment.</p>

<b>Section 2. Labor Standards</b>		<b>Guidance and Interpretations</b>
FLC-FC 1.4	Once the employer becomes an EFI-Verified FLC, three-day paid bereavement leave is available to workers for the death of an immediate family member. The term “immediate family” is defined to include the mother, father, brother, sister, domestic partner, spouse, child, mother-in-law, or father-in-law of the worker.	Document review shall demonstrate that paid bereavement leave is available to workers.
FLC-FC 1.5	Payment of wages to someone other than the worker or into a bank account not controlled by the worker is prohibited. Employers do not have unauthorized access to workers’ bank accounts.	Document review and WIs shall demonstrate that all wages are paid to the worker in a manner where workers have full control of the payment and employer does not have unauthorized access to workers’ accounts.
FLC-FC 1.6	There is a documented policy that affirms the “Employer Pays” principle.	Document review shall demonstrate that the operation has a written policy regarding their commitment to the Employer Pays principle and have clearly documents the following: 1. The employer’s commitment to the Employer Pays Principle 2. Which costs related to the recruitment or placement of workers are the employer’s responsibility to pay or reimburse 3. A schedule that facilitates prompt reimbursement (if applicable)
FLC-FC 1.7	Employer shall pay or reimburse fees that are for the direct and exclusive purpose of accepting employment.	Fees that the employer shall cover and/or reimburse may include, but are not limited to those included in this itemized recruitment cost list managed by the International Labor Organization (ILO).
FLC-FC 1.8	All trainings and Leadership Team meetings pertaining to these Standards occur on the clock.	Document review of training schedules and payroll records shall demonstrate that workers were compensated during the attendance of any trainings related to the on-going conformity with these Standards.



Section 2. Labor Standards		Guidance and Interpretations
Standard FLC-FC-2 Workers receive workers' compensation insurance coverage.		
FLC-FC 2.1	Workers' compensation coverage is provided to all workers, even if state law excludes agricultural employers or workers.	Document review shall demonstrate that all workers have workers' compensation coverage.
FLC-FC 2.2	At a minimum, workers' compensation benefit levels are equivalent to those afforded to non-agricultural workers in that state.	Document review of the workers' compensation insurance policy shall demonstrate that it is equal to or greater than the state legislated minimum for non-agricultural workers.
Fair Working Conditions (FLC-FWC)		
Standard FLC-FWC-1 A transparent and clear policy and system for disciplinary measures exists and is communicated to workers. The system includes fair warning principles and disciplinary actions that are proportionate to the conduct in question.		
FLC-FWC 1.1	<p>A written policy exists and is in operation for disciplinary measures and is communicated effectively to workers by employers, in the language primarily understood by the workers. It provides:</p> <ol style="list-style-type: none"> <li>1. A clear statement of what constitutes acceptable behavior in the workplace;</li> <li>2. A fair and transparent framework to follow when there are allegations of misconduct;</li> <li>3. A clear understanding of what behaviors lead to disciplinary action and what those disciplinary actions are; and</li> <li>4. Financial disciplinary action is prohibited.</li> </ol> <p>The disciplinary actions are progressive in nature, from verbal warning to written warning to suspension up to and including termination.</p>	Document review and WIs shall demonstrate that a written disciplinary measures policy exists with all of the required provisions and has been communicated to workers.
Standard FLC-FWC-2 An accurate, reliable, and transparent time-keeping system, which records the time that each worker starts and leaves work, is maintained, and workers are compensated properly for all time worked.		

<b>Section 2. Labor Standards</b>		<b>Guidance and Interpretations</b>
FLC-FWC 2.1	Time spent at work is recorded accurately. The employer and worker both have access to documentation of the time workers start and finish work each day, including all time associated with breaks, Leadership Team meetings and training.	Document review shall demonstrate that workers and employers have access to accurate data from a work-time recording system.
FLC-FWC 2.2	In cases where an employer fails to maintain accurate time records, the worker's recollection of hours worked prevails.	Document review, MIs and WIs shall demonstrate that in cases where the employer fails to maintain accurate time records, the worker's recollection of hours worked have been applied to calculate wages owed.
FLC-FWC 2.3	In cases where workers are required by the employer to be transported to work, the paid work time begins at the time the worker boards the employer-designated transportation and ends upon disembarking.	Document review, MIs and WIs shall demonstrate that workers are paid for time spent on employer-required transportation.
Standard FLC-FWC-3 Working hour requirements are reasonable, rest breaks and meal periods are provided, and overtime work is strictly voluntary.		
FLC-FWC 3.1	There is no retaliation against any worker who declines to accept overtime work. "Overtime work" is defined as more than 10 hours of work per day or 60 hours of work per week or applicable regulations if fewer.	Document review and WIs shall demonstrate that no punitive or retaliatory action has been taken against workers who have declined overtime work.
FLC-FWC 3.2	Employer shall regularly communicate to workers that overtime is voluntary, ensuring that workers may always opt out of overtime if they are unable or unwilling.	Document review, MIs and WIs shall demonstrate that employer regularly communicates that overtime is voluntary and that workers may choose not to work overtime if they are unwilling or unable, without fear of retaliation. When the opportunity for overtime arises, it shall be communicated to workers in advance.
FLC-FWC 3.3	Employers who provide mandatory transportation to the worksite must also provide departure transportation at the end of each regular shift for workers who choose not to accept overtime.	MIs and WIs shall demonstrate that workers have access to transportation to leave the worksite at the end of regular working hours.
FLC-FWC 3.4	Workers receive a paid 15-minute rest period, which insofar as practical, will be in the middle of each four-hour period.	Document review and WIs shall demonstrate that workers received a paid 15-minute rest period in the middle of, as much as practical, each contiguous four-hour period.
FLC-FWC 3.5	Workers receive a 30-minute lunch break, that may be unpaid in accordance with local law, for each five hours worked.	Document review and WIs shall demonstrate that workers receive a 30-minute lunch break for each five hours worked.
FLC-FWC 3.6	Workers are compensated, at the appropriate wage rate, for all time under the direction and control of the employer whether or not actual work is being performed.	Document review and WI shall demonstrate that workers are compensated at the appropriate rate for the entire time they are under the direction and control of the employer.

Section 2. Labor Standards		Guidance and Interpretations
Standard FLC-FWC-4 Slavery, human trafficking, and forced labor, including bonded or prison labor, do not occur.		
FLC-FWC 4.1	The employer or any of their representatives do not hold, for any reason, any part of the worker's salary, benefits, property, or documents.	Document review and WIs shall demonstrate that: 1. Workers maintain control of personal possessions, including legal documents such as passports, visas, or identification; and 2. There are no deductions from worker pay or retention of documents or property related to recruiting fees or otherwise compelling workers to remain employed by the company.
FLC-FWC 4.2	The employer refrains from any form of physical or psychological measures requiring workers to remain employed by the company.	WIs shall demonstrate that physical or psychological measures are not used to compel a worker to remain in the employ of the company.
FLC-FWC 4.3	Workers are not forced to work in any situation which poses risk to their health or, if they are pregnant, to the health of their fetus. If requested, workers are reassigned to an alternative position.	Document review shall demonstrate that there is a written policy that no worker will be compelled to work in a situation that poses serious risks of injury, illness, or death to the worker or, where applicable, that of their fetus.  WIs shall demonstrate that workers are not compelled to work in a situation that poses serious risks of injury, illness, or death to the worker.
FLC-FWC 4.4	Usurious interest rates or unreasonable terms on loans made to workers are prohibited and do not occur.	A document review shall demonstrate that when pay advances or loans are made to workers, that: 1. Any reasonable wage reductions for repayments are disclosed and agreed to in writing prior to any deduction; 2. Repayment terms do not inflate the worker's indebtedness or cause the worker to be bound to the employer; and 3. Authorized wage deductions are within legal limits and ensure sufficient income for necessities, except for the final wage payment, which may be used to discharge any remaining debt.
FLC-FWC 4.5	Bonded labor does not occur.	Document review and WIs shall demonstrate that no worker is forced to work in order to pay off a debt or loan.
FLC-FWC 4.6	There is no use of prison labor.	Document review shall demonstrate that there has been no use of prison labor.
FLC-FWC 4.7	There is no use of slave or trafficked labor.	Document review and WIs shall demonstrate that there has been no use of slave or trafficked labor.
Standard FLC-FWC-5 Child labor does not occur.		
FLC-FWC 5.1	Employers have a verification process in place that establishes that a worker is of the legal age to work.	Document review and WIs review shall demonstrate that there is a documented age verification process for workers upon first hire.

<b>Section 2. Labor Standards</b>		<b>Guidance and Interpretations</b>
FLC-FWC 5.2	No person is employed or has access to any work areas at an age younger than 16.	Document review and WIs shall demonstrate that no person under the age of 16 is employed or is ever transported by the employer, or under the supervision of the employer at any worksite. Access to work areas for children can be granted only in the case of supervised tours or community programs.
FLC-FWC 5.3	No person under the age of 18 undertakes hazardous work, i.e. work which by its nature or circumstance is likely to harm the health or safety of the worker or working hours that conflict with compulsory education.	Document review and WIs shall demonstrate that there is a written and implemented policy that workers under the age of 18: 1. Shall not undertake hazardous work; and 2. Shall not work during hours that conflict with compulsory education.
FLC-FWC 5.4	A policy is in place such that, should an underage worker be identified, he/she is removed from the workforce immediately and kept safe.	Document review shall demonstrate that there are written protocols for removing underage workers in manner that ensures their immediate safety.
<b>Non-discrimination (FLC-ND)</b>		
Standard FLC-ND-1 There is no discrimination against any worker on the basis of age, race, color, sex, sexual orientation, religion, national origin, ethnicity, trade union membership, disability, pregnancy, family status, or any other legally protected status.		
FLC-ND 1.1	A policy is in place that ensures that none of the forms of discrimination listed above occur in hiring, compensation, promotion, transfer, assignments, lay-off, recall, termination or any general management decisions.	Document review shall demonstrate that a written policy exists that prohibits discriminating in hiring, compensation, promotion, transfer, assignments, lay-off, recall, or termination decisions against any worker on the basis of age, race, color, sex, sexual orientation, religion, national origin, ethnicity, trade union membership, disability, pregnancy, family status, or any other legally protected status.
FLC-ND 1.2	The non-discrimination policy is clearly communicated to every worker.	Document review and WIs shall demonstrate that the non-discrimination policy has been communicated.
FLC-ND 1.3	No discrimination in hiring, termination, or other adverse actions occur for pregnancy, lactation, or maternal leave following childbirth.	Document review and WIs shall demonstrate that: 1. Employers do not ask female workers about pregnancy status; 2. Employees shall be informed regarding occupational health risks for pregnant women; 3. Pregnancy testing and medical tests are not administered either during the hiring process or during employment; and 4. No punitive or retaliatory action for pregnancy, lactation, or maternal leave following childbirth has occurred.
FLC-ND 1.4	Workers, including indigenous workers, are allowed to communicate in their native languages.	WIs and LTIs shall demonstrate that workers are not punished or discouraged from communicating in their native languages.

<b>Section 2. Labor Standards</b>		<b>Guidance and Interpretations</b>
Standard FLC-ND-2 Sexual harassment is not tolerated and there are policies in place to ensure a prompt and impartial investigation of any sexual harassment claims. Sexual harassment includes any insult or inappropriate remark, joke, insinuation, or comments on a person's dress, physique, age, or family situation; a condescending or paternalistic attitude, with sexual implications undermining dignity; any unwelcome invitation or request, implicit or explicit, whether or not accompanied by threats, any lascivious look or other gesture associated with sexuality; and any unnecessary physical contact, such as touching, caressing, or pinching.		
FLC-ND 2.1	Sexual harassment of any sort is strictly prohibited, and penalties for acts of harassment are clearly stated. The employer communicates this expectation to all clients.	Document review shall demonstrate that there is a written policy that defines and prohibits sexual harassment, and clearly states consequences for acts of harassment. Document review shall demonstrate the employer has communicated this requirement to all clients.
FLC-ND 2.2	Sexual harassment awareness training is provided upon hire to all workers, supervisors, and management.	Document review, MIs and WIs shall demonstrate that upon hire all workers receive training on the sexual harassment policy.
FLC-ND 2.3	At least one male and one female on the Leadership Team have received training focused how to support self-identified survivors of sexual harassment, sexual violence and/or discrimination in a trauma-informed manner.  The entire workforce is informed of whom these two LT members are, and have access to communicate with them, if they have questions about reporting sexual abuse and do not feel comfortable discussing with their supervisor or HR directly.	Document review, LTIs shall demonstrate that there is both a female LT member and a male LT member available to respond to questions about how to report concerns or instances of sexual harassment, sexual abuse and/or discrimination. These members of Leadership Team are not responsible for managing reports directly, but instead offer workers access to a peer-to-peer support channel between the workforce and the formal reporting system. WIs shall demonstrate that workers have access to a confidential channel for communicating these concerns and that they know who on the Leadership Team they can reach out to if they want support in the process of reporting.
FLC-ND 2.4	Policies are in place, and communicated to all workers, which describe how claims of sexual harassment will be investigated. The confidentiality of all individuals involved will be protected, to the extent possible.	Document review & WIs shall demonstrate that the sexual harassment policy is communicated and implemented in a manner that protects confidentiality.
<b>Dispute Settlement (FLC-DS)</b>		
Standard FLC-DS-1 There is a clear and effective dispute settlement mechanism in place to ensure transparent resolution of workplace disputes between workers and employer or management when they occur.		
FLC-DS 1.1	The Leadership Team is trained on interest-based issue resolution.	Document review of the EFI attestation shall demonstrate that interest-based issue resolution training has been completed during the current certification cycle.

Section 2. Labor Standards		Guidance and Interpretations
FLC-DS 1.2	Workers and management have a documented dispute resolution policy and process through which they may engage in dialogue to resolve workplace issues and violations of the EFI Standards, including retaliatory actions and unjust firings. If the parties are unable to reach agreement on a non-EFI Standards related issue, workers or the employer have access to a multi-level appeal procedure.	Document review of the dispute resolution policy shall demonstrate that it: 1. Details a process for workers and the employer to engage in dialogue to resolve workplace issues and violations of the EFI Standards, including retaliatory actions and unjust firings; and 2. Includes a provision that, if the parties are unable to reach agreement on a non-EFI Standards related issue, workers or the employer have access to a multi-level appeal procedure.  WIs shall demonstrate that the dispute resolution policy has been implemented.  LTIs shall demonstrate that the Leadership Team has reviewed the employer's dispute resolution mechanism and procedures, gathers nonconfidential data on implementation as appropriate, and formulates recommendations as needed to ensure proper implementation of the dispute resolution mechanism and procedures.
FLC-DS 1.3	Workers and managers are trained as to their respective roles, rights, and responsibilities under these Standards.	Document review, LTIs, WIs, and MIs shall demonstrate that workers and managers are trained on these Standards.
FLC-DS 1.4	Workers and employers are not required to and do not waive legal remedies.	Document review shall demonstrate that no evidence exists that workers or the employer have waived remedies open to them under the legal jurisdictions in which they operate.
<b>Employer-Provided Housing (FLC-EPH)</b>		
Standard FLC-EPH-1 If the employer provides workers with housing, the conditions and the infrastructure of the housing ensure decency, privacy, and security, and housing is provided at reasonable or no cost.		
FLC-EPH 1.1	All beds have clean, sanitary mattresses.	Visual observation and document review shall demonstrate that all beds have clean, sanitary mattresses that are periodically maintained.
FLC-EPH 1.2	Adequate ventilation exists to ensure the indoor temperature does not exceed 80°F or 27°C.	Visual and temperature observation shall demonstrate that adequate ventilation is provided.
FLC-EPH 1.3	All windows and doors that open have screens.	Visual observation and physical testing shall demonstrate that all windows and doors that open are equipped with screens.
FLC-EPH 1.4	Doors and windows to the outside lock from the inside.	Visual observation and physical testing shall demonstrate that doors and windows lock from the inside.
FLC-EPH 1.5	Heat is supplied when the outdoor temperature drops below 60°F or 15.5°C.	Visual and temperature observation and WIs shall demonstrate that heating is supplied whenever the outdoor temperature drops below 60°F or 15.5°C



<b>Section 2. Labor Standards</b>		<b>Guidance and Interpretations</b>
FLC-EPH 1.6	Running water, clean drinking water, and sanitary facilities are provided at all times. If common bathrooms and showers are provided, such facilities are provided separately for men and women.	Visual and physical observation and Wis shall demonstrate that housing has: 1. Running water; 2. Clean drinking water; and 3. Operating sanitary facilities, which are provided separately for men and women where common bathrooms and showers are provided.
FLC-EPH 1.7	Secure facilities whereby workers may store their personal possessions under lock and key are provided.	Visual observation shall demonstrate that housing has secure storage facilities where workers may store their personal possessions under lock and key.
FLC-EPH 1.8	Workers are not charged a fee for transportation to the worksite from employer-owned or -provided housing.	Document review and Wis shall demonstrate that there has been no charge for transport to and from employer-provided housing and the worksite.
FLC-EPH 1.9	Workers have the right to invite any guests of their choosing into their employer-provided housing, subject to the legitimate right of the employer to screen and document visitors in order to maintain the safety and security of workers on the premises and subject to legal obligations established under state or federal laws.	Document review and Wis shall demonstrate that workers are able to invite any guests in accordance with the provisions of the indicator.
FLC-EPH 1.10	Workers have privacy in their living quarters and sanitary facilities.	Visual observation and Wis shall demonstrate that workers have privacy in their living quarters and sanitary facilities.
FLC-EPH 1.11	Laundry facilities are provided.	Visual observation shall demonstrate that operating laundry facilities are provided.
FLC-EPH 1.12	Workers have access to essential services, including religious services, medical attention, cultural events, laundromats, banking needs and shopping, at least once per week during regular business hours.	Document review and Wis shall demonstrate that workers have meaningful and reasonable access to essential services, no less than once per week. Document review shall include logs and other documents regarding transportation provided to or arranged for workers.
FLC-EPH 1.13	Electronic surveillance at the employer-provided housing is not used for intimidation or control and workers are made aware of where and when it is in effect.	Document review shall demonstrate that there is a written policy which provides credible justification for why, how, and when it is employed, and which prohibits its use for the purposes of intimidating or controlling workers.  Wis shall demonstrate that electronic surveillance has not been used to intimidate or control workers.  Visual observation shall demonstrate that all areas subject to electronic surveillance have signage that make this clear to the workers.
Standard FLC-EPH-2 Housing for workers complies with all federal, state, and local regulations, including regulations promulgated by state or local environmental health authorities.		

<b>Section 2. Labor Standards</b>		<b>Guidance and Interpretations</b>
FLC-EPH 2.1	Housing inspections occur prior to occupancy.	Document review and MIs shall demonstrate that housing has been inspected and found to be in compliance with relevant state and federal regulations prior to occupancy or on an annual basis.
Standard FLC-EPH-3 Auditors and other representatives of EFI have unimpeded, unannounced access to housing.		
FLC-EPH 3.1	Employers agree to permit unimpeded access to housing. Unimpeded access to housing is provided to assessors and other representatives of EFI.	Representatives of the CB and EFI have unimpeded access to housing.

<b>Fair Labor Recruitment (FLC=FLR)</b>		
Standard FLC-FLR-1 The recruitment of all workers occurs in a transparent and fair manner. Employment is provided free of cost and without prejudice.		
FLC-FLR 1.1	Employer and any associated subcontracted labor providers/recruiters comply with applicable laws in each worker's country of origin and the country of employment.	Document review shall demonstrate that the employer and any sub-contractor engaged or utilized by the employer to recruit and hire workers have disclosed the country of origin of each worker and provided credible documentation establishing compliance with that nation's and the destination nation's, laws and regulations.  Where such documentation is not available, a document review shall demonstrate that subcontracted labor providers engaged or utilized by the employer have provided a signed attestation of compliance with that nation's laws and regulations.
FLC-FLR 1.2	The employer immediately provides the name, phone number, email, and physical address of subcontracted labor providers/recruiters in the foreign country to EFI or its designee.	Document review shall demonstrate that the employer provided EFI immediately upon engagement the contact information of subcontracted labor providers/recruiters to EFI or its designee.
FLC-FLR 1.3	The employer has written contracts with all subcontracted labor providers/recruiters that compels the provider/recruiter to follow all applicable laws in the country of origin of the workers and country of destination. The employer instructs subcontracted labor providers/recruiters in foreign countries to fully and transparently cooperate with representatives of EFI to ensure all standards are met.	Document review shall demonstrate that the employer has written contracts with all labor providers with associated terms. Document review shall demonstrate that the contract between an employer and a subcontracted labor provider/recruiter stipulates that the labor provider transparently cooperates with representatives of EFI and the CB to ensure all standards are met.



Section 2. Labor Standards		Guidance and Interpretations
FLC- FLR 1.4	Workers do not pay recruitment, visa or, other costs or fees related to employment.	Document review and WIs shall demonstrate that workers have not paid any recruitment or other fees.
FLC- FLR 1.5	The employer provides a transparent contracting process to support the worker's evaluation of job requirements.	<p>Document review of recruitment communication demonstrates the employer has a process in place to create a transparent contracting process for new workers.</p> <p>This process must include (at a minimum):</p> <ul style="list-style-type: none"> <li>• Photos and descriptions of the housing site and what is included</li> <li>• Details about the rules of the housing</li> <li>• Details about the rules of the worksites</li> <li>• Details about the type of weather and conditions they will work in so that they can organize appropriate clothing/PPE that isn't provided by the employer</li> <li>• Details about what training they will receive</li> <li>• Details about who their family can contact in case they cannot get in touch with them</li> </ul>
FLC- FLR 1.6	An action plan assesses gender equity, including in Guest Worker visa recruitment, and identifies milestones for achieving greater gender balance across the entire workforce.	<p>Document review shall demonstrate that the employer has a written action plan to assess the gender equity including in Guest Worker recruitment and hiring.</p> <p>This plan shall include steps, and establish significant milestones, for achieving gender balance.</p>
FLC- FLR 1.7	The employer does not engage with subcontracted labor providers/recruiters who use any form of physical or psychological measures to compel workers to become employed by the company.	WIs shall demonstrate that physical or psychological measures are not used to compel a worker to become employed by the employer or subcontracted labor provider/recruiter.
FLC- FLR 1.8	The employer has conducted due diligence on its own responsible recruitment management system by completing the EFI Responsible Recruitment Scorecard (RRSC) for its own operations. If the employer uses contracted labor providers/recruiters, the RRSC is completed for each labor provider/recruiter. The RRSC shall be updated annually for the employer operations and any contracted labor providers.	<p>Document review of the employer's RRSC results shall demonstrate that the employer has conducted an internal self-assessment of their recruitment process and has a timeline-based improvement plan in place for any responses indicating risk.</p> <p>Document review of the RRSC certificate of completion for all contracted labor providers/recruiters (if applicable) shall demonstrate the employer has a process in place for evaluating the recruitment practices of each individual sub-contracted labor provider/recruiter.</p>
Worker Involvement – Labor (FLC-WI-L)		

<b>Section 2. Labor Standards</b>		<b>Guidance and Interpretations</b>
Standard FLC-WI-L-1 Workers have been informed about and show an understanding of their rights and responsibilities guaranteed in accordance with these Standards.		
FLC-WI-L 1.1	Workers have been informed about and show an understanding of their rights and responsibilities with regard to workers' compensation coverage.	Document review and WIs shall demonstrate the channel of communication and workers understanding.
FLC-WI-L 1.2	Workers have been informed about and show an understanding of the minimum required pay rates, benefits, breaks, lunch breaks, child labor prohibitions, and the written disclosure of their terms and conditions of employment.	Document review and WIs shall demonstrate that workers have been informed about and show an understanding of their rights and responsibilities with regard to: 1. Minimum required pay rates; 2. Fringe benefits; 3. Breaks and lunch breaks; 4. Written disclosure of the terms and conditions of their employment
FLC-WI-L 1.3	Workers have been informed about and show an understanding of the no-retaliation policies within these Standards.	Document review and WIs shall demonstrate that workers have been informed about and show an understanding of the EFI policies that prohibit retaliation against workers for engaging in certain activities or holding a certain status.
FLC-WI-L 1.4	Workers have been informed about and show an understanding of the process by which workplace issues are resolved.	Document review and WIs review shall demonstrate that workers have been informed about and show an understanding of the process by which workplace issues are resolved.
FLC-WI-L 1.5	Workers have been informed about and show an understanding of the role of the Leadership Team and Crew LT members.	Document review and WIs of shall demonstrate that workers have been informed about and show an understanding of the role of the LT.
FLC-WI-L 1.6	Workers have been informed about and show an understanding of RMI prevention.	Document review, LTIs and WIs shall demonstrate that workers have received training on and show an understanding of RMI prevention.
FLC-WI-L 1.7	Workers and supervisors have been informed about and show an understanding that physical, psychological, and verbal abuses, or discrimination of any kind are not tolerated.	Document review, MSIs and WIs shall demonstrate that workers and supervisors have been informed about and show an understanding that physical, psychological, and verbal abuses or discrimination are not tolerated.
FLC-WI-L 1.8	Workers have been informed about and show an understanding of the sexual harassment prevention, reporting, and response policy.	Document review, LTIs and WIs shall demonstrate that workers have been informed about and show an understanding of the sexual harassment policy prevention, reporting, and response.