

**ON THE LEVEL
PERFORMANCE SUMMARY
GOLDEN SEA**

Country: Myanmar Market for certification: Myanmar-Thailand OTL certification status: OTL listed	Date accepted in OTL program: 1 August 2019 Contact person: U Than Thin Contact information: million.golden@gmail.com
Training: 1-2 August 2019	Evaluation score: Strong evidence of learning
Self-assessment: 30 September 2019	Completed
Audit date: 5-6 December 2019	Total OTL standards: 70 Total conformance: 11 Total conformance with risk: 1 Total non-conformance: 35 Total not-applicable: 15 Total not audited: 8
Corrective action submission: 30 April 2020	Total non-conformance: 35 Total completed corrective actions: 0
Improvers program: October 2020 to August 2021 Date of last review: August 31, 2021	Performance areas: 15 Conformance: 3 Non-conformance: 0 Developing: 8 For verification: 4
Verification audit:	Status: To be scheduled

PERFORMANCE AREAS	STATUS	DESCRIPTION
Legal requirements		
No reports of workers paying illegal, unauthorized, or excessive fees	For verification	Full implementation of this requirement is pending and subject to OTL verification. The agency has updated its procedure to monitor its sub-agents and has provided a template agreement with clients-employers that shows the fees to be charged to workers are only legal fees. This has to be confirmed by workers.
No legal citations	Conformance	No adverse findings.
Market competitiveness		
Fees structure aligned with OTL requirements	For verification	Full implementation of this requirement is pending and subject to OTL verification. The agency has provided a fee structure aligned with OTL requirements.
Completed cost-benefit analysis	Developing	The agency plans to complete this requirement when business resumes.

Marketing plan towards employer-pays model	Developing	The agency plans to develop this further when business resumes and market prospects are clearer.
Evidence of increase in employer-pays recruitment	Developing	The agency has set targets towards increasing employer-pays business and can work towards these targets when business resumes.
Worker support		
Effective feedback and grievance system	Developing	The agency has updated its grievance procedure. This can be developed further into a clear company-wide policy and included in training for staff and workers.
Standard and consistent pre-departure training course conducted by the agency or in partnership with OTL-aligned provider	For verification	Full implementation of this requirement is pending and subject to OTL verification. The agency already provides pre-departure training for workers.
Evidence of professional development		
Completed progressive learning program	Conformance	Agency management and key staff attended all required trainings and consulting sessions with OTL mentors.
Increased staff training on code of conduct and ethical recruitment topics	Conformance	The agency conducted training and workshops for its staff on the following topics: code of conduct, improvement plan, marketing plan, planning for ethical recruitment.
Implemented code of conduct, processes, and tools	For verification	Full implementation of this requirement is pending and subject to OTL verification. However, the agency updated its code of conduct and the following policies, processes and tools that did not meet OTL standards: <ul style="list-style-type: none"> - Discrimination, harassment, grievance and complaint procedure - Confidentiality policy - Reimbursement policy - Sub-agent monitoring procedure - Occupational health and safety assessment - Service agreement with employers template
Control over supply chain		
Presence of agreements and contracts with all suppliers and employers	Developing	The agency has a template service agreement with employers. This has to be applied to all employers and suppliers. The agency is expected to progress on this when business resumes.
Presence of risk assessment procedure for suppliers, industries, corridors, and employer	Developing	The agency has updated its occupational and safety risk assessment. The risk assessment can be developed further to include risks in industries, corridors, and employers. The agency is expected to progress on this when business resumes.
Stakeholder partnerships		
Performance improvement plan communicated to stakeholders	Developing	The agency is expected to communicate its performance improvement when its

		operations return to normal but making this summary publicly available is already a move towards transparency.
Clear policy on recruitment fees publicly shared	Developing	The agency has ways to clearly communicate its fee policy to workers through posters and social media. The agency is still working on how to formally communicate this to more stakeholders.