

The factual information set forth on the Tracking Charts was submitted to the FLA by each Independent External Monitor and Participating Company and reviewed by FLA staff. It is being made available to the public pursuant to the FLA Charter in order to strengthen the monitoring process. The FLA Charter provides for regular public disclosure of the factual results of independent monitoring and the resulting specific actions taken by Participating Companies.

What is a Tracking Chart?

Compliance is a process, not an event. A Tracking Chart outlines the process involved in FLA independent external monitoring and remediation. It is used by the accredited independent external monitor, the participating company and the FLA staff to do the following:

- **Record Findings:** The independent external monitor uses the Tracking Chart to report noncompliance with FLA Code standards. The monitor should also cite the specific Code benchmark or national/local law that was used to measure compliance.
- **Report on Remediation:** The FLA participating company uses the Tracking Chart to report on the remediation program that was implemented in order to resolve the noncompliance and prevent any future violations.
- **Evaluate Progress:** The FLA uses the Tracking Chart for purposes of collecting and analyzing information on the compliance situation of a particular factory and for publication on our website. This information is updated on an ongoing basis.

What a Tracking Chart is NOT -

- An exhaustive assessment of factory conditions

Working conditions - in any type of workplace - are dynamic. Each Tracking Chart represents a survey of the factory's conditions on a specific day. Over time, a fuller picture emerges as we compile information from various sources to track the compliance progress of a factory.

- A pass or fail evaluation

The Tracking Charts do not certify whether or not factories are in compliance with the FLA Code. Monitoring is a measurement tool. The discovery of noncompliance issues is therefore not an indication that the participating company should withdraw from a factory. Instead, the results of monitoring visits are used to prioritize capacity building activities that will lead to sustainable improvements in the factory's working conditions.

- A one-time event

Each monitoring visit is followed by a remediation program, further monitoring and remediation in an ongoing process. The Tracking Charts are updated accordingly.

Note on Language

Please be advised that because FLA independent external monitors are locally-based and English is generally not their native language, the language presented may at times appear unclear to a reader who is a native English speaker. In order to preserve the integrity of the transparency process and the information we receive, our policy is to publish the original text from the monitor and participating company. However, the reader will note that we have taken the precaution to remove any identifying information about the factory that was monitored or the workers interviewed.

For example, in cases where monitors and/or participating companies have cited the actual number of workers in reference to a noncompliance issue, in order to protect the workers' identities, we have replaced the numbers with generic wording in brackets (i.e. "[some]", "[worker interviews revealed that]", etc.).

We do not disclose the name of the factory that was monitored in order to ensure that the FLA's efforts to encourage and reward transparency do not have detrimental consequences for the factory and the workers.

Instructions for Printing

The information contained in the Tracking Charts is organized by columns and rows in a table format. Due to the number and width of the columns, the charts have been formatted for legal size (8.5 x 14in.) paper. To print the charts, please make sure to select "legal" size paper from Print properties.

FLA Audit Profile	
Country	El Salvador
Factory Code	01032209A
IEM	Cotecna
Date of audit	5/13/02
Duration of IEM visit/evaluation	2 Days
PC(s)	adidas, Nike & Reebok International Ltd.
Number of workers	761

FLA Code/ Compliance Issue	FLA Benchmark and/or Legal Reference	Findings		Remediation		Remediation Updates		
		Cotecna Findings	PC Internal Audit Findings	PC Remediation Plan	Target Completion Date	PC Updates/Follow-up Comments October 2002	PC Updates/Follow-up Comments December 2002	PC Updates/Follow-up Comments January 2003
1. Code Awareness	Per FLA Principles of Monitoring IB Create an Informed Workplace: Ensure that all Company factories as well as contractors and suppliers inform their employees about the workplace standards orally and through the posting of standards in a prominent place (in the local languages spoken by employees and managers) and undertake other efforts to educate employees about the standards on a regular basis.	The FLA Code Of Conduct has not been sent to this facility.	Participating companies Code of Conduct is posted and training provided on brand codes.	No action required. Brands will continue to provide training on Codes of Conduct.				
2. Forced Labor								
3. Child Labor								
4. Harassment or Abuse								
No Harassment or abuse	Per FLA Code Benchmark III. Harassment or Abuse: B.1. Employers will utilize progressive discipline, e.g., escalating discipline using steps such as verbal warning, written warning, suspension, termination. Any exceptions to this rule, e.g., immediate termination for theft or assault, shall be in writing and clearly communicated to workers. 4. Employers will utilize consistent written disciplinary practices that are applied fairly among all workers.	No clear written work rules.		Workers and supervisors should be provided clear, written rules and guidelines. 1. Factory management should create and publish factory rules that define acceptable and unacceptable actions and the relevant disciplinary actions. Ensure that there is an appropriate relationship between the rules, violations, and the resulting disciplinary action. 2. Post the work rules and disciplinary policy in several public places in the factory. 3. Provide employees with a copy of the policy and then follow up training. 4. Provide supervisors with a copy of the policy and then follow up leadership training. 5. All workers should be aware of the formal grievance procedures or appeal system. Management should identify a confidential non-compliance reporting mechanism and provide training on grievance procedures to all workers. Include training in new employee orientation.	15-Oct-02	Internal rules of the workplace created, Harassment and Abuse policy created specifying acceptable and unacceptable behaviors and resulting disciplinary action; both rules and Harassment and Abuse Policy posted in a public place. Employees provided with a copy of the policy and received training in the policy and procedures. Supervisors provided with written copy of the policy and training on the policy and procedures. Confidential grievance procedures identified and workers informed of procedures for reporting a grievance.	Training provided to all employees on workplace rules, Harassment and Abuse policy, and confidential grievance procedures. As per worker and management interviews, no Harassment or Abuse reported to date. Employee interviews revealed that workers understand policy and know how to report an incident.	No Harassment or Abuse reported to date. Worker interviews reveal that workers understand policy. Ongoing monitoring will be performed.
5. Discrimination								
Pregnancy Testing	Per FLA Code Benchmark IV. Non-Discrimination: B.4. Employers will not use pregnancy tests or the use of contraception as a condition of hiring or of continued employment. Employers will not require pregnancy testing of female employees, except as required by national law.	Pregnancy test	adidas Internal audit findings indicate that pregnancy testing was performed prior to January 2002. The ongoing action plan has been that Adidas Salomon/brand will follow up to verify that no pregnancy testing is performed. This regular verification includes employee interviews (of new female employees), interviews with the on site nurse and doctor, and a review of medical files.	1. Factory management should have a written policy for discrimination. The policy should state that recruitment and post-hiring decisions are based solely on the individual's ability to perform the job. The policy should include a statement that no pregnancy testing will be performed or requested of employees. Management should not request a pregnancy test, question applicants of pregnancy status, or have a question about pregnancy on the employment application. 2. Post the non-discriminatory hiring policy in a public place in the factory.	15-Oct-02	As per employee interviews, no pregnancy testing performed or requested; according to newly hired female employees no pregnancy test performed or required and no questions of pregnancy status asked. Ongoing monitoring to be performed. Policy created, posted and distributed to all workers, human resources and medical staff. Training on policy provided to all workers.		PC compliance staff has conducted and will continue to conduct interviews with new female employees. PC compliance staff verified that written policy has been distributed to Human Resources and clinic staff. Copy of policy has been reviewed by PC compliance staff and a copy is available at headquarters and in factory office. PC compliance staff verified that training on policy has been provided to all workers. Ongoing monitoring will be performed.
6. H&S								
Fire Safety / Evacuation procedures	Per FLA Benchmarks VB, Health and Safety: B.1. Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits. 2. All documents required to be available to workers and management by applicable laws (such as policies, MSDS, etc.) shall be made available in the prescribed manner and in the local language or language spoken by majority of the workers if different from the local language.11. All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with applicable laws.	No current fire permit posted.		Obtain and post current local fire permit in a public place.	15-Oct-02	Local fire department does not issue fire permits. The certificates of fire safety training and recent records of fire evacuation drills are posted on public notice board. Certificates of fire safety training and records of fire evacuation drills are kept on file.	PC's compliance staff verified that fire safety training certificates posted on public notice board and kept on file.	PC's compliance staff verified that fire safety training certificates posted on public notice board and kept on file.

FLA Code/ Compliance Issue	FLA Benchmark and/or Legal Reference	Findings		Remediation		Remediation Updates		Remediation Updates														
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	Per FLA Benchmarks VB, Health and Safety: B. 1. Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits. 3. All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, unblocked aisles/exits, employee education, evacuation procedures, etc.) shall be complied with and workers shall be trained in proper safety, first aid, and evacuation procedures. 11. All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with applicable laws.	Passageways in Cutting section and in the Reception Warehouse were blocked with boxes at time of visit.		Aisles should be clearly marked and unobstructed. Clearly mark all aisles and keep them free from obstruction. The H&S committee should regularly check aisles to ensure they are marked and unobstructed.	15-Oct-02	Aisles are clearly marked. Ironing section exceeded the aisles markings. Management is constructing an additional warehouse space next door to existing plant. The increased space will reduce or eliminate the blocked and obstructed aisles in the current packing area.	Aisles clear and free from obstruction. Health and Safety Committee regularly checks aisles to ensure they are marked and clear of obstruction. The recommendation is to keep a log or checklist of elements in the factory checked by H&S committee. Include unobstructed aisles as part of the checklist; check, record findings, and remediate weekly. Management is constructing an additional warehouse space next door to existing plant (projected completion date November 02). The increased space will reduce or eliminate the blocked and obstructed aisles in the current packing area. Oct 02, Ironing section exceeded the aisles markings. Management will adjust the workstations by Dec 30, 02 so that they do not obstruct designated aisle space. Warehouse is still under construction; projected completion date Jan 30, 03. Dec 02: Workstations adjusted with respect to aisle markings. Aisles clear and free from obstruction.	Jan 03; Aisles clear of obstruction. New warehouse under construction; projected completion April 03.														
Architectural Considerations																						
Workplace comfort/ workplace cleanliness	Per FLA Benchmarks VB, Health and Safety: B. 1. Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits. 2. All documents required to be available to workers and management by applicable laws (such as policies, MSDS, etc.) shall be made available in the prescribed manner and in the local language or language spoken by majority of the workers if different from the local language. 11. All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with applicable laws.	Sewing section overcrowded, 4.73 sq. meters per worker as against 7 sq meters ILO recommendation	Neither FLA or adidas benchmarks specifically cover square meters per worker standard. However, each workstation should have sufficient clearance to exit in the event of an emergency, and there should be enough space for workers to perform the functions of their job without overcrowding or danger.	1. Please advise how workspace areas were designed. Advise of the meters per workstation used for planning the sewing production area and what standard was used to determine the ratio used. 2. Analyze the square meters of the sewing area and the number of workers in the sewing area. 3. Analyze fire drill evacuation times to verify that each worker in the sewing area has sufficient clearance to evacuate quickly in the event of an emergency. 4. Using the results, determine if the current space allotment is safe, useable and practical.	15-Dec-02	1. Factory uses the local/national space per worker standard of 4.75m2 per worker. 2. Production area is 4,300 m2 (not including mezzanine warehouse area) and there are 906 workers for a ratio of 4.75 m2 per person. 3. Factory conducted two fire evacuation drills: March 15, 02 and July 5, 02. The time elapsed to evacuate all employees was 2 minutes 42 seconds and 2 minutes 59 seconds respectively; workers had sufficient clearance to evacuate quickly. 4. Management agreed to conduct regular drills and record evacuation times to ensure that all workers can evacuate quickly and safely. Evacuation times increased slightly from the drill held in March 02 to the drill held in July 02. Evacuation times should decrease or improve over time and times should not exceed 3 minutes.	Evacuation time is under 3 minute goal. Oct drill: 2min, Dec drill: 2min 35 sec. Continue to perform and analyze evacuations to improve/decrease evacuation time. Aisles are sufficiently wide for evacuation. H&S team will continue to monitor aisles width. PC compliance staff has verified through fire drill records that the factory (including sewing area) can be efficiently evacuated in under 3 minutes.	PC compliance staff has verified through fire drill records that the factory (including sewing area) can be efficiently evacuated in under 3 minutes.														
Waste & Chemical Management																						
Chemical handling/ chemical materials	Per FLA Benchmarks VB, Health and Safety: 1. Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits. 8. All ventilation, plumbing, electrical, and lighting services shall be provided and maintained to conform to applicable laws and prevent hazardous conditions to employees in the facility. 11. All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with applicable laws.	Cleaning room is too small, requires better ventilation	Ventilation in the spot cleaning room must be evaluated and an appropriate ventilation system installed.	1. Please advise of the dimensions of the spot cleaning room (in meters), the number of people in room, the number of workstations in room, and any existing extraction systems in place. 2. details will support the best option for improving ventilation. 3. As relevant, appropriate ventilation should be installed that would include updraft and downdraft extraction to vent VOC fumes and/or windows, fans or air vents to improve air flow.	15-Dec-02	At time of follow up visit there were 4-5 operators in the spot cleaning room. Management stated that this was due to pending delivery time for product and unusual. No more than 4 workers should be in the room at one time to prevent overcrowding. The area was crowded with boxes and stacked product. Management plans to place racks outside the spot cleaning room to decrease crowded conditions and improve space considerations in the room. Sept 23, 02 - Downdraft extraction was not sufficiently strong. Management/maintenance will increase the motor capacity for the downdraft extraction to improve ventilation. Management will request air quality testing from government agency. Oct 28, 02 - Boxes and stacked product removed from area; area is less crowded. Racks had not been installed; management agreed to install racks by Dec 30, 02. All workers in area trained in chemical handling and use. Management has requested air quality testing from government agency; date of testing not yet assigned. Management will inform aS of testing date.	Boxes and stacked product removed from area, only 3 workers in area; area is less crowded. Workers have sufficient space to evacuate in the event of an emergency. A 3 horsepower extractor was installed to increase downdraft extraction. Dec 02; Extend extraction tube (that is vented outside cleaning room) so that it is free and clear of the windows to prevent recirculating inside factory.	Jan 03; Extraction tube has been extended so that it does not return fumes to work area. All workers using proper PPE. Amount of product in spot cleaning area was greatly reduced because management addressed the source of the problem. Corrective action was implemented for the machines and operators to reduce and eliminate the need for spot cleaning. PC Compliance staff verified that workers have sufficient space to evacuate in the event of an emergency. August 03; Only three people working in the spot cleaning room, all wearing the appropriate PPE. Extraction tubes have been glued with rubber cement so there are no leaks, so extraction is done to 100% capacity.														
Sanitation Kitchen / Canteen / Toilets																						
Bathrooms	Per FLA Code Benchmark V. Health and Safety: All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with applicable laws.	Insufficient WC's for women, 22 against 27 needed.	Based on OSHA standards for number of toilets in table below, there are sufficient number of toilets per female workers in the factory. There are 22 toilets for 664 female workers for a ratio of 1:30 toilets per female worker. <table border="1"> <tr> <th>Number of Employees</th> <th>Toilets</th> </tr> <tr> <td>1- 15</td> <td>1</td> </tr> <tr> <td>16-35</td> <td>2</td> </tr> <tr> <td>36-55</td> <td>3</td> </tr> <tr> <td>56-80</td> <td>4</td> </tr> <tr> <td>81-110</td> <td>5</td> </tr> <tr> <td>111-150</td> <td>6</td> </tr> </table> Over 150 add one additional fixture for each additional 40 employees.	Number of Employees	Toilets	1- 15	1	16-35	2	36-55	3	56-80	4	81-110	5	111-150	6	Based on this formula, there should be 20 toilets for women, and the factory has 22 so this is in compliance. If management would like to use a best practice, install 5 additional women's toilets to improve the ratio of toilets per female workers from 1:30 to 1:25.	15-May-03	Management plans to add toilets to new warehouse facility. Projected completion date of warehouse May 03.		
Number of Employees	Toilets																					
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Drinking water	Per FLA Code Benchmark V. Health and Safety: All ventilation, plumbing, electrical, and lighting services shall be provided and maintained to conform to applicable laws and prevent hazardous conditions to employees in the facility.		BACKGROUND: The Ministerio de Salud, as requested by the Salvadoran government, has begun a series of monthly water quality tests to be performed in various locations in the plant every month from October 2002 going forward. Water quality standards based on Norma Salvadorena Obligatoria Para La Calidad Del Agua Potable, World Health Organization (WHO) and EPA standards for drinking water. As a part of ongoing water quality maintenance and continuous improvement, [Factory] employees (a small select team) were trained to clean and disinfect the Oasis bottles and water dispenser tubing once a week. Plant management has posted signs and made all employee announcements indicating that the [Filtered] water is the only potable water that should be used as [Water quality testing performed by laboratory] September 2002 (results were negative, no presence of pathogens). Test results on file. Water quality testing performed by the Salvadoran Social Security Institute on the drinking water in May 2001 (results were negative). Test results on file.	ACTION REQUIRED: 1. Bi-monthly drinking water quality test will be performed by two agencies: a) Ministerio de Salud and b) Tecnologia de Agua Company. Keep results on file. Forward (fax) results to SOE Manager by the 30th of each month. 2. Maintain log of weekly [Filtered water] cleaning on file. 3. Hold regular H&S Committee meetings. Committee should verify water quality testing and monitoring plan is being followed and implement any corrective action necessary. 4. Contract independent lab for additional water quality testing by December 10. Augment current testing to include testing for disinfection byproducts parameters as per US EPA National Primary Drinking Water Standards. Forward test results to SOE Manager by December 30. Keep results on file. 5. Provide verbal Explain potable water purification system, explain that workers are only to drink from [Filtered water] bottles, and refer to printed material that is posted stating this information. Communication Committee representatives will relay questions and feedback from their module to the committee.	12/15/2002 and ongoing		1. Min de Salud tests for Oct 02 results negative/<1.1. Tests for Dec 02 from independent lab were found negative/<1.0. Minerological tests performed by independent lab were within legal parameters (ph, solids/dissolved solids, iron, magnesium, calcium). 2. Weekly log of [Filtered water] cleaning on file. 3. H&S Committee meetings should include water quality standard information. 4. Independent lab tests performed by FUSADES (Fundacion Salvadorena para el Desarrollo Economico y Social) analyzing coliforms and bacteria as well as pH, calcium, magnesium, iron and total amount of solids. The results were within legal parameters. 5. Signs have been posted at all the [Filtered] drinking water bottles informing the workers that the water is purified and is potable. The signs also inform the workers not to drink from any other source except the purified drinking water bottles. All kitchen staff uses the purified potable water for cooking. The H&S and Communications Committee answers questions regarding water quality for workers.		
7. Freedom of Association & Collective Bargaining									
Union Membership	Per FLA Code Benchmark VI. Freedom of Association and Collective Bargaining: B.1. Workers will have the right to establish and, subject only to the rules of the organization concerned, to join organizations of their own choosing without previous authorization. The right to freedom of association begins at the time that a worker seeks employment, and continues through the course of employment.	As per worker comments they are not free to form a union.		1. Factory management needs to understand and be committed to the rights of workers to join and organize associations of their choosing and to bargain collectively. 2. Management should not hinder or obstruct workers who wish to legally associate and collectively bargain. 3. Factory management needs to encourage the worker management communication group started in 2001 and ensure that there are effective, formal communication channels between workers and managers.	15-Oct-02	Employee interviews revealed that some workers ... were familiar with the Codes of Conduct and ROA standard. Several workers stated that they knew of union activity but did not want to or feel the need to be associated with a union. Half of the workers interviewed were familiar with the activities of the communications committee. Management stated their commitment to FoA/RoA; management agreed that they would not obstruct workers from organizing. Management has encouraged the formation and development of the worker management communication group which meets regularly to discuss workplace issues. Management reviewed code of conduct with all employees which includes verbal explanation and employees signing copy of code to verify that they received explanation and understood the meaning of the codes. The worker management communication group continues to meet regularly, some suggestions have resulted in changes made by management in the factory. Employee interviews revealed that they understand and regularly communicate to the committee members who relay comments to the communication group and management. Ongoing employee interviews will be performed to ensure that communications group is an effective channel to voice grievances.	Employee interviews revealed that they understand and regularly communicate to the committee members who relay comments to the communication group and management. Ongoing employee interviews will be performed to ensure that communications group is an effective channel to voice grievances.	FoA training provided to management by both Reebok and adidas June 2003. Training was provided to a group of [Agent] suppliers ([X] factories), including 1 member of [factory] staff responsible for compliance issues. Training included a review of El Salvadoran law, ILO conventions, and brands' codes of conduct regarding FoA. Training addressed the issue of "blacklisting" and other non-compliant practices. Discussion included how a supplier would comply with the laws and codes of FoA and how to promote worker/management communication within the factory. Factory management confirmed their commitment to FoA and ensuring compliance to the national laws and brands' codes of conduct. Training also covered expectations for candidate screening and hiring practices. Freedom of Association training for Management and workers will be conducted by the independent monitor VERITE, the 23 and 27 of September 2003, respectively.	
			Workers should be aware of their rights to organize and bargain collectively.	1. adidas and brands can provide training on Freedom of Association and Collective Bargaining, and other standards of the Code of Conduct.	15-May-03	adidas and Reebok provided individual training on the standards in codes of conduct to management, specifically RoA/FoA. A coordinated training on RoA and Codes of Conduct is planned for May 03.			
8. Hours of Work									
Mandatory Overtime	Per FLA Code Benchmark VII. Wages and Benefits, Hours of Work, and Overtime Compensation: 1) The employer will demonstrate a commitment to reduce mandated overtime and to enact a voluntary overtime system to meet unforeseen situations. 2) Overtime hours worked in excess of code standard will be voluntary.			Create voluntary overtime policy and procedures. Inform all employees of the policy. Ensure that workers and supervisors understand they may refuse overtime without any penalties.	15-Oct-02	Voluntary overtime policy created and posted. Workers trained in policy. As per employee interviews, workers understand that overtime is voluntary and no punishment received for refusing to work overtime. Ongoing monitoring will be performed.	PC compliance staff has verified that management has created and enforces voluntary overtime. Ongoing monitoring will be performed.		
10. Forced Overtime									