

*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	China
Factory name	360315515E
EM	FL O1, China
Date(s) in facility	December 25-26, 2006
PC(s)	Puma AG, adidas AG, Asics Corp.
Number of workers (Production)	1,100
Production processes	Cutting, Sewing, Ironing, Inspection, Packing

FLA Code/Compliance Issue	Country/Law/Regulation Reference	FLA Benchmark	Non-compliance	Risk of Non-compliance	FLA Findings	FLA Remediation	FLA Remediation Plan	Target Completion Date	Factory Response (Optional)	Documentation	Updates (Site Date of Follow up)	Status	Third-Party Verification	Company Verification Follow up
FLA Code/Compliance Issue	Country/Law/Regulation Reference	FLA Benchmark	Non-compliance	Risk of Non-compliance	FLA Findings	FLA Remediation	FLA Remediation Plan	Target Completion Date	Factory Response (Optional)	Documentation	Updates (Site Date of Follow up)	Status	Third-Party Verification	Company Verification Follow up
<b>FLA Code Awareness</b>														
Code posting/information		FLA Principle of Monitoring, Obligation of Companies: Establish and articulate clear, written workplace standards. Formally convey those standards to Company factories as well as to licensees, contractors and suppliers.	Puma and Asics' Code were observed posted but Asics' was not.		Factory tour		1. Asics will send poster to factory in English and language. 2. Factory management shall post Code poster in a prominent place. 3. In addition, Asics is developing a letter to workers summarizing newly adopted workplace standards. Letter will be passed to every related supplier once ready. OHS/COE poster will be kept in the factory until new one provided for replacement.	1-Mar-07	3. Asics will issue the updated letter to workers and standards before the end of April 2007. Suggest the hanging height of the poster should be around 170cm.			Completed		
Work/management awareness of Code		FLA Principle of Monitoring, Obligation of Companies: Ensure that all Company factories as well as contractors and suppliers inform the employees about the workplace standards only through the posting of standards in a prominent place (in the local language spoken by employees and managers) and undertake other efforts to educate employees about the standards on a regular basis.	Workers stated that they were not aware of Client's COC. As per management, the factory performs Code Awareness training during recruitment, however most of the workers have not grasped the meaning of Client's Code of Conduct.		Workers interview		1. Factory will set up regular training schedule and implement COC training for workers include training into the new center orientation. 2. Factory needs to prepare a brief text for workers comprehension. Contents shall be very easy with bullet sheet. 3. In addition to include trainings of code in new workers training, the COC should also be included in worker handbook.	1-Mar-07	1. Factory plans to include the group Code of Conduct in their updated worker handbook. 2. Factory needs to prepare a brief text for workers comprehension. Contents shall be very easy with bullet sheet. 3. In addition to include trainings of code in new workers training, the COC should also be included in worker handbook.			On-going		
Confidential non-compliance reporting channel		FLA Principle of Monitoring, Obligation of Companies: Develop a secure communications channel, in a manner appropriate to the culture and situation, to enable Company employees and employees of contractors and suppliers to report to the Company on non-compliance with the workplace standards, with security that they shall not be punished or prejudiced for doing so.	No confidential non-compliance reporting mechanism has been established at the facility by Puma, Asics or Asics.		Factory tour and workers interview		1. Factory to ensure that training on communication channels and grievance procedures is provided to factory HR manager to ensure that a proper system has been established in regards to the communication process. 2. Asics is developing a workers' hotline project. Until new confidential reporting mechanism implemented, add a field to the code number will be posted on the old poster. 3. In addition, the other brands will attach sticker labels on their COCs indicating the contact address and number for workers to use as a confidential reporting mechanism to report grievance and non-compliance.	1-Mar-07	2. Asics will issue the updated letter to workers with relevant contact information before the end of April 2007.			On-going		
Forced Labor		There will not be any use of forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise.												
Child Labor		No person will be employed at an age younger than 15 (or 14 where the law of the country of manufacture allows) or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15.												
Misreatment or Abuse		Every employee will be treated with respect and dignity. No employee will be subjected to any physical, sexual, psychological or verbal harassment or intimidation.												
Health and Safety		No person will be subjected to any discrimination in employment, including hiring, salary, benefits, advancement, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, national, political, ethnic, or social or ethnic origin.												
Fire Safety, Health and Safety legal compliance		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.	Boiler license is missing.		Document review and management interview		1. Boiler has not been inspected by local authority because it was transferred from outside the country, but the regular inspection indicating that it is working properly has been kept by local experts. 2. Factory shall, however, stop using the current boiler as regular inspection has been installed. 3. Factory shall ensure that the boiler license is secured and kept on file and available for inspection anytime.	1-Mar-07	1-3. Factory just replaced a new boiler in March. Currently, professional person with proper certificate maintains it regularly. After 3 months's test, they will get the boiler license. The old boiler is still kept in the factory but is out of an electricity and water connection.			On-going		
Document Maintenance/Accessibility	Art. 12 of PRC Safe Use of Chemical Materials in Production Area: The chemical materials used in the factory should be labeled. Dangerous chemical materials should be clearly labeled and safety instructions shall be provided to operators/MSDS should be offered to workers who use it.	All documents required to be available to workers and management by applicable laws (such as MSDS, 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.	First aid procedures and MSDS were not posted.		Factory tour		1. Factory has posted the first aid procedures at working place. 2. Chemical maker is delayed in providing MSDS to factory. Factory will find alternative chemical manufacturer if the current maker does not submit MSDS within 3 months. 3. Provide briefing on the MSDS to workers involved in handling chemicals.	30-Jan-07	1. Factory already issued and posted the first-aid procedures in writing. Suggest that factory improve the procedure by adding diagrams and pictures for easier understanding.			On-going		
Evacuation Procedure	Art. 14.8 of PRC Fire Prevention Law: Keep the evacuation passages and exits clear. Start of the safety demonstration in accordance with national standards.	All applicable legally required or recommended elements of safe evaluation (such as posting of evacuation plans, unobstructed aisles, employee education, evacuation procedures, etc.) shall be carried out and workers shall be trained in proper safety, first aid, and evacuation procedures.	One of the two exits was blocked and blocked by materials in warehouse on 1st floor.		Factory tour		1. Factory shall ensure CM team regularly checks that exits are unobstructed during working hours and aisles and workplaces are free of obstruction and that production department layout allows for adequate emergency evacuation.	20-Jan-07	1. According to on-site inspection, the layout of production department is improved and factory is still adjusting the moving and packing workshop for further improvement, expected to be complete by the end of April. 2. The factory is to include necessary policy and procedures to ensure regular follow up in the HSE management system for maintenance of emergency exits and aisles.			Completed		
Safety Equipment	Art. 14.5 of PRC Fire Prevention Law: The company should maintain fire fighting facilities and equipments and fire safety signs in accordance with State regulations; company must also check and maintain the equipments regularly to ensure that they are in working conditions.	All safety and medical equipment (such as fire fighting equipment, first aid kits, etc.) shall be in place, maintained with prescribed and accessible to the employees.	1. Emergency lights and exit signs were missing on two floors, maintained with materials in warehouse on 1st floor. 2. In material warehouse, the emergency lights were out of stage.		Factory tour		1. Include the emergency lights in the regular safety inspection. Emergency lights should be checked on a monthly basis. 2. Place document emergency light check results.	20-Jan-07	1-2. Factory has included emergency lights in its regular checks and is documenting the check results.			Completed and on-going		
PPE	Art. 54 of Labor Law: The employer shall provide laborers with PPE. Art. 74 of Factory Safety and Health Rules: Factory shall provide working clothes or aprons and provide working helmets, masks, gloves, leg and knee guards in accordance to requirements. Art. 37 of PRC Work Safety Law: Production and business units shall provide employees with PPE that meets the national standards or industrial specifications, and they shall give instruction to their employees and see to it that they wear or use these PPE in accordance with the rules for their use.	Workers shall wear appropriate protective equipment (such as gloves, eye protection, hearing protection, respiratory protection, etc.) to prevent unstable exposure (such as installation or contact with equipment, noise, dust, etc.) to hazardous elements including medical waste.	1. The nose level of around 20 overhead machines chemicals were stored together with stationary in general warehouse. 2. Masks and gloves were not provided to workers using acid cleaning chemical 3. In cutting section, one worker was not using provided steel gloves while operating the cutting machine.		Factory tour and workers interview		1. Factory shall devote their best efforts towards reducing the risk from workplace accidents. 2. Provide workers with correct PPE for workers who require PPE such as workers in cutting department, workers who work with chemicals or are found in areas with loud noise. 3. Factory management to enforce the use of PPE, and supervisors should ensure workers use PPE at all times. 4. Brief workers on the importance and proper and consistent use of PPE.	20-Jan-07	During on-site inspection, most workers wear PPE properly. Factory management had provided PPE to related workers on-site. Training plan and records show that trainings are arranged for all workers, including regular orientation training and occupational disease training to enhance the understanding and implementation of wearing PPE. Relevant supervisors are trained to do proper monitoring.			On-going		
Chemical Management	Art. 20 of Regulations on Safe Use of Chemicals in the Workplace: The information concerning health and safety when utilizing hazardous chemicals shall be open to the employees. And the employers shall be trained to recognize safety labels, understand technical directions and master necessary means to deal with emergency and save themselves. Besides, there shall be regular training on how to use chemicals safely in the workplace. Art. 60 of PRC Factory Safety and Sanitary Regulation: Poisonous and hazardous goods shall be stored at specific locations separately, and shall be managed with stringency.	All chemicals and hazardous substances should be properly labeled and stored in accordance with applicable laws. Workers should receive training, appropriate to their job responsibilities, in the safe use of chemicals and other hazardous substances deal with emergency and save themselves. Besides, there shall be regular training on how to use chemicals safely in the workplace.	1. Washing and spot cleaning chemicals were stored together with stationary in general warehouse. Empty chemical containers were put back in the general warehouse. No recycle plan exists. 2. Facility does not provide chemical safety training to relevant workers.		Factory tour and management interview		1. Factory shall store chemicals properly grouped and separated in accordance as required by MSDS. 2. Factory shall not put empty chemical containers in general warehouse and factory shall control recycling supplier with legal certification to collect and recycle them regularly. 3. Facility shall provide chemical safety training to relevant workers regularly, or at least twice/yearly.	15-Apr-07	1. Factory separated a room for chemical storage. Company compliance team has suggested that factory store chemicals in secondary container. Factory is still searching for proper replacement for a dry-cleaning agent.			Completed		
Freedom of Association and Collective Bargaining		Workers will recognize and respect the right of employees to freedom of association and collective bargaining.												
Freedom of Association - FLA Comment		FLA Comment: The Chinese constitution and Freedom of Association: However, the Trade Union Act prevents the establishment of trade unions independent of the state official trade union - the All China Federation of Labor Unions (ACFTU). According to the ILO, many provisions of the Trade Union Act are contrary to the fundamental principles of freedom of association, including the non-recognition of the right to strike. As a consequence, all factories in China fall short of the ILO standards on the right to organize and bargain collectively. Recently, however, the government has produced new regulations that could improve the functioning of the labor relations. The Amended Trade Union Act of October 2008 does stipulate that union committees have to be democratically elected at members' assemblies and trade unions must be accountable to their members. The trade union has the responsibility to consult with management on key issues of importance to their members and to sign collective agreements. It also grants the trade union an enhanced role in dispute resolution. In December 2003 the Collective Contracts Decree introduced the obligation for representative trade unions and employers to negotiate collective agreements, in contrast to the previous system of (non-regulated) administrative agreements.	There is a union in place at the factory. It had organized activities of entertainment, law education, etc. among workers. However, interview shows that workers have little knowledge of existing union and freedom of association. They are also not enthusiastic about joining the union. Though some of them had participated in the activities organized by union, they did not realized it is organized by the union.		Factory tour		Factory has been taken their best effort to educate workers during new workers training. 2. Factory management will hand book so far. Factory management shall implement systems to ensure effective communication with employees like management & safety or welfare committees are in place.	1-Mar-07	1. CSR staff has explained the union and its function during new workers training. 2. Factory promised to improve the system on HSE committee and welfare committees. They will select members from both management and workers, and refine the policy and procedure of the committee function. Assigned staff of the factory coordinating center will lead and work with the committee. Activities and follow-up will be included in their monthly report. The factory is proposed to be conducted among workers in the week starting April 16. Records and documents will be provided for further verification.			On-going		
Wages and Benefits														

FLA Code/ Compliance Issue	Country Law/Legal Reference	FLA Benchmark	Non-compliance	Risk of Non-compliance	IRM Findings				PC Remediation plan	Target Completion Date	Remediation		Updates (Due Date of Follow up)		Status	Third-Party Verification	Company Verification Follow up	
					Evidence of Non-compliance (unsubstantiated)	If not corroborated, explain why	Sources/Documentation used for corroborating	Notable Features implemented by Factory Management or Company			PC Internal Audit Findings (Optional)	Factory Response (Optional)	Company Follow Up (April 2, 2007)	Documentation				Company Follow Up (August 15, 2007)
Employers recognize that wages are essential to meeting employees' basic needs. Employers will pay employees, as a base, at least the minimum wage required by local law or the prevailing industry wage, whichever is higher, and will provide legally mandated benefits.																		
Legal benefits	Art. 72 of PRC Labor Law: Management and employees must participate in social insurance programs.	Employees will provide or legally mandated benefits to all eligible workers	Facility has registered 52% workers (951 out of 1100) for pension, medical care and unemployment. All workers registered occupational injury insurance. According to legal requirement, facility needs to register all workers for pension, medical care unemployment and occupational injury. Child-bearing insurance is not legally required in the region at present.			Document review and management interview				1. Factory shall encourage workers to join the social insurance for 100%. 2. Factory shall submit a plan of how to gradually increase the number of workers to be covered until 100% coverage is attained.	1-Mar-07	The number of workers for social insurance in factory conforms to the demand of local authority. In order to ensure the workers' real rights and workers' real protection, factory bought the commercial insurance to all workers who didn't join social insurance, which includes protection of accident, incident, medical care and injury insurance; all that protection items are same as social insurance. So that factory can say all workers registered occupational injury insurance. By the way, the number of social insurance will be increased year by year and comply with request from local authority.	1. Factory also suggested that factory buy commercial maternity insurance or build up an internal benefit system to ensure workers can get compensated on maternity.		Factory provides private maternity insurance to its workers but such needs to be improved, as pregnant workers can only get RMB100 on maternity. However, factory insurance covers all workers for medical, injury, and unemployment, as required by local law.	On-going		
Legal Compliance for holiday/leave	Art. 51 of PRC Labor Law: The employer shall pay wages to laborers in accordance with law when they have legal holiday, take leaves during periods of marriage or mourning, and participate in some festivities in accordance with law.	Workers will be paid for holidays and leave as required by law	Facility did not pay any salary for the 10 mandated paid holidays in January, February, May and October.			Payroll review and management interview.				1. Factory management must include in the wage and benefits policy for the payment of public holidays. Announce to all employees and post copy of notice at the working areas. 2. Factory management to provide backgages for any holiday pay if did not provide to workers in 2006.	19-May-07	Factory ensured all workers shall be paid legally with public holidays. The monthly standard pay day factory is counted except every national holiday and public holidays (Saturday and Sunday). So every single month own different number of standard pay day. Note: There are 28 standard pay days. If the standard pay days are under 20.92 days, factory will make sure extra workers are pay legally with basic wages and public holidays without any wage deduction. For holidays. However, overtime wage is counted to base of 20.92 day/month.	According to the investigation, factory guarantees that workers are paid no less than the local minimum wage of RMB600 per month if they have full attendance, and they also pay correct overtime wage at the standard hourly rate of RMB 4.12 plus the corresponding applicable OT premiums of 50% and 100% for weekdays and night days. Workers are offered leave on public holidays without any wage deduction. For workers who ask for leave (on normal working day for vacation), their monthly basic salary will be 60% (actual days worked / total normal working days). As there are public holidays in the month, if work is arranged, they would pay at holiday rates of RMB 4.12 x 3; no work is arranged there is no deduction and therefore the payments comply with local law. 2. Based on the verification of wages in 2006, no work had been arranged on any mandated holiday. All workers were offered leave without deduction from the basic salary (as the monthly basic salary is guaranteed, they received paid holiday leave). Hence, there were no unpaid holidays in 2006.	According to payroll and policy investigation, factory already changed its policy and payroll calculation system to the correct way which meets local standards for OT premium, holiday, and regular wages.	Completed			
Accurate recording of wage compensation		All hourly wages, piecework, bonuses, and other incentives will be calculated and recorded accurately	Discrepancies were found between two workers' time records and material distribution list. As per material distribution list, both employees worked on Dec 17th while the time records show that they rested on that day.			Document review and management interview				1. Factory shall ensure that workers will use their time cards to participate and act when reporting for work to ensure that all working hours and days are properly recorded. 2. Factory shall guarantee the authority of its time and payroll records. PC compliance team will continue to monitor this issue.	20-Mar-07	There was no power supply on that day, so extra workers enjoyed one day off. The two workers pointed out were also get day off and confirmed by interview once again. The material distribution list was mistake due to hand writing.	1. Company compliance teams have suggested that factory improve its management system and conduct internal monitoring regularly to ensure its working hour records are accurate and consistent. Company compliance teams will continue to monitor this issue.	Time records did not reveal any non-compliance issues. Also, working hours were kept under 60 hours per week. This was also verified through worker interviews.	Completed			
<b>9. Hours of Work</b>																		
Except in extraordinary business circumstances, employees will (i) not be required to work more than the lesser of (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture or, where the laws of such country will not be the hours of work, the regular work week in such country plus 12 hours overtime, and (ii) be entitled to at least one day off in every seven day period																		
Overtime Limitations	Art. 41 of PRC Labor Law (Chapter 4 Working Hours, Rest Days and Holidays): Employees should not be allowed to work more than 3 overtime hours per day and 36 overtime hours per month	Except in extraordinary business circumstances, employees will (i) not be required to work more than the lesser of (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture or, where the laws of such country will not be the hours of work, the regular work week in such country plus 12 hours overtime, and (ii) be entitled to at least one day off in every seven day period. An extraordinary business circumstance is temporary period of extra work that could not have been anticipated or alleviated by other reasonable efforts	1. It is observed that 80% of sampled workers had worked more than 60 hours in a week. 78 hours maximum. And the situation lasted for 4 weeks in July. 2. [Some] workers worked up to 4 overtime hours per day, 8 hours maximum, which exceeded the daily limitation stipulated by PRC Labor Law. No excessive hours were observed in other months.			Payroll review, management interview and workers interview				1. Review cause of production delay and institute corrective action to eliminate excessive OT. Train production staff to monitor progress of production and coordinate with other production sections to avoid possible causes of delay that result in extra overtime and work on rest day. 3. Factory management must provide one day in seven off as required by local law and PC's standards.	15-Jan-07	The urgent production need caused overtime during that period. However, factory ensures compensation and voluntary work.	1. Factory had developed a plan for reducing overtime work, including recruiting more workers at specific periods, training multi-functional workers, etc. Companies have suggested that factory management define their training plan with more detailed information and timeline.	Time records showed that working hours were reduced to no more than 60 hours per week. Factory is currently using a subcontractor to solve the overtime problem. Currently, subcontractor only produces for [other brand] which has already approved the facility. In addition, factory management has assigned a person to conduct regular audits at its subcontractor.	On-going			
Overtime Limitations	Art. 38 of PRC Labor Law: Employer shall guarantee that its laborers have at least one day off per week.	Except in extraordinary business circumstances, employees will (i) not be required to work more than the lesser of (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture or, where the laws of such country will not be the hours of work, the regular work week in such country plus 12 hours overtime, and (ii) be entitled to at least one day off in every seven day period. An extraordinary business circumstance is temporary period of extra work that could not have been anticipated or alleviated by other reasonable efforts	One employee worked consecutively for 13 days from July 10th to July 22nd.							1. Review cause of production delay and institute corrective action to eliminate it. 2. Train production staff to monitor progress of production and coordinate with other production sections to avoid possible causes of delay that result in extra overtime and work on rest day. 3. Factory management must provide one day in seven off as required by local law and PC's standards.	15-Mar-07	Factory ensured that all workers have one day off in seven days. Due to the urgent production need, the worker was switched working hours of July 16th to July 19th. Between July 10th and 22nd period, this worker had 2 days off, 7/19 and 7/22.	Factory had developed a plan for reducing overtime work, including recruiting more workers at specific periods, training multi-functional workers, etc. Companies have suggested that factory management define their training plan with more detailed information and timeline. PC will continue to verify this issue.	Time records showed that working hours were reduced to no more than 60 hours per week. All workers receive one day in seven off.	Completed			
<b>10. Overtime Compensation</b>																		
In addition to their compensation for regular hours of work, employees will be compensated for overtime hours at such premium rate as is legally required in the country of manufacture or, in those countries where such laws will not exist, at a rate at least equal to their regular hourly compensation																		
Regie subcontracting			The subcontractor used by the facility is recommended by Puma but no one from the subcontractor to ensure the implementation of the code compliance.			Document review and management interview				1. Factory shall communicate with subcontractors to explain the PC's CoC, and conduct a training and meeting between factories to ensure the subcontractor understands PC's CoC and standards. 2. Factory shall require sub-contractor require subcontractor to comply with the standards and shall assign a responsible person to monitor compliance of the sub-contractor.	1-Apr-07	1. Factory is updating the subcontractors information and is planning to send to brands before the end of April. 2. Factory management also proposed to include Code of Conduct training in their regular quarterly meeting with suppliers. One specific staff from sourcing center is assigned to work with relevant staff of factory business department to follow up this issue.	The factory has hired a subcontractor to produce their products for [brand]. The subcontractor was accepted by [brand]. However, there were no documentation showing that the subcontractor receive any training from factory.	On-going				