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.
Trainings:

The factory has contacted ***Local Group*** and set a date for training. CoC and Disciplinary training for management is scheduled for July 13 - July 14th.

Worker/management awareness of Code of Conduct:

Companies:

- Outdoor Cap is introducing a new confidential non-compliance reporting channel at the Production, Quality Control, and Customer Service departments.
- Companies are encouraged to inform their employees about the Code of Conduct posting/information.
- The factory has been cautious about the age for completing compulsory education in the country of manufacture where such age is higher than 15.
- Employees' birth certificates, which verify date of birth, are provided by the factory management when needed. None of the workers received appointment letter and confirmation letter. The letters are only kept in personnel files.
- The factory has sent 5 copies of age verification documents provided by the factory management for new hires of 2005 and that of employees under age of 20.
- The factory added the statement "I Employee name, age for Completing Compulsory Education in Country of Manufacture allows me to work for Outdoor Cap, Inc." on the appointment letter.

Documentation Company Follow up:

- The factory has installed a child care facility in 2003 and must now promote the use of the facility, which will not physically overlap with the use of the factory. Details on the location of the facility will be provided by the factory management.
- The factory added the statement "I Employee name, age for Completing Compulsory Education in Country of Manufacture allows me to work for Outdoor Cap, Inc." on the appointment letter.
- The factory sent us a copy of the child register and policy for no workers under the age of 18.
- The factory attended the training on next factory visit in 2005. No follow up audit was done in 2005 by Outdoor Cap VP. Factory was audited by Intertek 10/07/06.
- The factory sent us a copy of the non-compliance register and policy for no workers under the age of 18.

Child Labors:

- The factory installed a child care facility in 2003 and the factory must now promote the use of the facility.
- The factory added the statement "I Employee name, age for Completing Compulsory Education in Country of Manufacture allows me to work for Outdoor Cap, Inc." on the appointment letter.
- The factory sent us a copy of the child register and policy for no workers under the age of 18.
- The factory sent us the "non-harassment statement".

Disciplinary Practices:

- The factory will utilize consistent written disciplinary practices.
- The factory states that they will follow the recommended discipline practices.
- Every employee will be treated with respect and dignity.
- No employee will be subject to any physical, sexual, psychological or verbal harassment.
- All supervisors and employees on CoC, based on the training received by ***Local Group***.
- The factory completed the training by ***Local Group***.
- The factory sent us a copy of the non-compliance register and policy for no workers under the age of 18.
- The factory has attended the training on next factory visit in 2005. No follow up audit was done in 2005 by Outdoor Cap VP. Factory was audited by Intertek 10/07/06.
<table>
<thead>
<tr>
<th>Indicator or Risk</th>
<th>Practice</th>
<th>Completion Date</th>
<th>Factory Response (Optional)</th>
<th>Company follow up</th>
<th>updates</th>
<th>Remediation Updates</th>
<th>Findings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Factory Training</td>
<td>The factory will attend a training of supervisors/management on treatment of employees.</td>
<td>August 13, 14 and 15th, 2005.</td>
<td>The factory has created a written policy, &quot;Non-Hygienic Practices,&quot; which includes training for supervisors and workers. This was completed in August 13, 14 and 15th, 2005.</td>
<td>The factory sent photos of the newly acquired fire extinguishers, showing their location throughout the factory. This will be updated with each map at all designated locations throughout the factory.</td>
<td>Send photos to Outdoor Cap of building X &amp; X where you have repainted the aisle markings by March 15, 2005.</td>
<td>This noncompliance was not found during 2006 or 2007 audit.</td>
<td></td>
</tr>
<tr>
<td>Toilet use is encouraged only during the 2 times 10 minutes tiffin breaks &amp; lunch break.</td>
<td>This was not observed or noted during the 2006 audit.</td>
<td>The factory has held the 1st quarterly meeting on March 1st, 2005.</td>
<td>The factory has held 1st quarterly meeting on March 1st, 2005.</td>
<td>The factory has held 1st quarterly meeting on March 1st, 2005.</td>
<td>2007 audit conducted by Phulki in March 2008. Verification audit by Phulki 9/20/08.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Nondiscrimination</td>
<td>Employers will provide a safe and healthy working environment to prevent accidents and injury to health arising out of, linked with, or caused by their activities.</td>
<td>Per BEPZA Instruction, each company shall contribute a sum of money to BEPZA per year as prescribed by the Authority for the maintenance of EPZ Medical Centre/Hospital established for providing First Aid and Emergency Services to the employees of the companies within EPZ.</td>
<td>The factory is to send Outdoor Cap proof of payment for this element of safe evacuation (such as posting of evacuation plans, unblocked aisles/exits, employee education, evacuation procedures, etc.)</td>
<td>The factory is to send Outdoor Cap proof of payment for this element of safe evacuation (such as posting of evacuation plans, unblocked aisles/exits, employee education, evacuation procedures, etc.)</td>
<td>This was not observed or noted during the 2006 audit.</td>
<td>This noncompliance was not observed or noted during the 2006 audit.</td>
<td></td>
</tr>
<tr>
<td>Fire Safety</td>
<td>All safety and medical equipment (such as fire fighting equipment, first aid kits, etc.) shall be in place, maintained as prescribed and accessible to the employees.</td>
<td>This element was not found during the 2006 or 2007 audit.</td>
<td>This noncompliance was not found during the 2006 or 2007 audit.</td>
<td>This noncompliance was not found during the 2006 or 2007 audit.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Health and Safety</td>
<td>A prayer room is not specifically required by local law but it is written that every reasonable effort is made to provide a prayer room.</td>
<td>This element was not found during the 2006 or 2007 audit.</td>
<td>This noncompliance was not found during the 2006 or 2007 audit.</td>
<td>This noncompliance was not found during the 2006 or 2007 audit.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Safety Equipment</td>
<td>All safety and medical equipment (such as fire fighting equipment, first aid kits, etc.) shall be in place, maintained as prescribed and accessible to the employees.</td>
<td>This element was not found during the 2006 or 2007 audit.</td>
<td>This noncompliance was not found during the 2006 or 2007 audit.</td>
<td>This noncompliance was not found during the 2006 or 2007 audit.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Visual inspection &amp; documentation check</td>
<td>Fire extinguishers and safety signs, signs on doors, warning signs, emergency exits, fire safety equipment and disciplinary procedures.</td>
<td>Visual inspection &amp; documentation check</td>
<td>Visual inspection &amp; documentation check</td>
<td>Visual inspection &amp; documentation check</td>
<td>This noncompliance was not found during the 2006 or 2007 audit.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
This noncompliance was not found during Ventilation/Electrical/facilities audit in December with cord in the table or hands. completed by March 15, 2005. Send Outdoor Cap photos as evidence this was complete by March 15, 2005.

The factory has sent photos of the newly ventilated store. done in 2005 by Outdoor Cap VP. Factory was audited by Intertek 10/07/06.

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This noncompliance was not found during 2007 and training conducted by Phulki in March 2008. Verification audit by Phulki 9/20/08.

Deduction for Services

Deductions for services to employees will not exceed the maximum amount permitted by law. Send Outdoor Cap the factory's salary sheet, showing all employees and employee numbers, salary, hours worked, etc. for the month of March, we will then select 10 employees to have the records pulled and sent to us for verification. Send the salary information of all employees by April 15, 2005 for the month of March.

Updates

Remediation

Findings

Documentation

Practice

and conduct meetings with the employees annually to discuss wages, incentive systems, benefits and bonuses. Meeting notes are to be kept as records of such meetings. The factory will conduct these meetings with the employees by April 1, 2005.

Updates

Remediation

Findings

Documentation

Practice

Employers will provide workers a pay statement each pay period, which will show earned wages, regular and overtime pay, bonuses and all deductions. The pay statement is to be given to each worker on the day or the day the payment is made. The pay statement must be in the language of the worker the wages, incentive systems, benefits and bonuses to which all workers are entitled in that company and under the applicable law. The pay statement must include the company's name, the worker's name and number, the date and amount of payment, the period to which the pay relates, and the hours worked. The pay statement must be given at least once per month. The pay statement must be provided in a language that the worker understands.

The factory has sent 3 payroll records for review. The factory sent 10 records for our review, overtime was still found. We asked the factory to discontinue the overtime and that we would also help to schedule our PO's as per the Factories Act, 1965, Section 51, Weekly holidays (1) No adult worker shall be compelled to work on the prescribed weekly holidays unless the worker gives his consent in writing. No child shall be compelled to work on the prescribed weekly holidays. The factory shall provide all legally mandated benefits to their employees. The workers have the right to request for a holiday for any reason, and the company must provide the requested holiday. The workers do not have any authority on attendance bonuses.

The attendance bonus has been removed from the Phulki audit in December 2006 or 2007 audit.

Workers do not have any authority on the use of the time card punching machine individually. As the numbers of punching machines are 10 now (added in the factory), the workers do not have any authority on time card punching machine. The workers must start this by April 15, 2005. The factory is looking into other systems such as electronic swipe card systems. The factory has been asked to send 10 employee records for review. The factory sent 10 records for our review, overtime was still found. We asked the factory to discontinue the overtime and that we would also help to schedule our PO's. The factory has a new time system in place or a plan for a new time system with 90 days by April 15, 2005. Please send Outdoor Cap photos of the new time system or the plan by April 15, 2005.

Per the Factories Act, 1965, Section 51, Weekly holidays (1) No adult worker shall be compelled to work on the prescribed weekly holidays unless the worker gives his consent in writing. No child shall be compelled to work on the prescribed weekly holidays. The factory shall provide all legally mandated benefits to their employees. The workers do not have any authority on attendance bonuses. The workers do not have any authority on the use of the time card punching machine individually. As the numbers of punching machines are 10 now (added in the factory), the workers do not have any authority on time card punching machine. The factory has been asked to send 10 employee records for review. The factory sent 10 records for our review, overtime was still found. We asked the factory to discontinue the overtime and that we would also help to schedule our PO's. The factory has a new time system in place or a plan for a new time system with 90 days by April 15, 2005. Please send Outdoor Cap photos of the new time system or the plan by April 15, 2005.
### Updates

<table>
<thead>
<tr>
<th>FLA Code/ Compliance issue</th>
<th>Country Law/Legal Reference</th>
<th>FLA Benchmark</th>
<th>Monitor's Findings: Noncompliance, Remediation, Documentation</th>
<th>Best Practice/Compliance</th>
</tr>
</thead>
</table>

#### Voluntary OT

Overtime hours worked in excess of code standard will not exceed the local limit in the normal circumstances.

- **Voluntary OT** is not recorded.
- All overtime should be voluntary and a sign up sheet should be posted for all overtime.
- **Interviewed** All overtime should be voluntary.
- On April 15, 2005, managers decided to discontinue voluntary overtime work.

#### Overtime Compensation

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 rate.

#### Miscellaneous

- **Payment** of gratuity and bonuses must be made by law or local agreement, whenever applicable. The factory has been paying gratuity since April 15th, 2005.
- **Overtime** compensation is required by law and the factory has been paying overtime compensation since April 15, 2005.
- **Overtime compensation** is paid to employees according to local law.
- The factory has been following local law for overtime compensation since April 15, 2005.
- The factory has been paying overtime compensation in accordance with local law since April 15, 2005.
- The factory has been paying overtime compensation in compliance with local law since April 15, 2005.
- The factory has been paying overtime compensation in accordance with local law since April 15, 2005.
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