

*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.

<b>FLA Audit Profile</b>	
Country	Tunisia
Factory name	36007558D
IEM	Tunisia Team of the Fair Wear Foundation
Date(s) in facility	December 13-14, 2005
PC(s)	PUMA
Number of workers	[Factory 1] - 593; [Factory 2]- 97
Product(s)	Active Sport Apparel
Production processes	Knit, Dye, Cut, Sew, Packing

		IEM Findings							Remediation			
FLA Code/ Compliance issue	Country Law/Legal Reference	FLA Benchmark	Non-compliance	Risk of Non-compliance	Evidence of Non-compliance (un corroborated)	If not corroborated, explain why	Sources/Documentation used for corroborating	Notable Features implemented by Factory Management or Company	PC Remediation plan	Target Completion Date	Factory Response (Optional)	Company follow up (Cite date of follow up)
<b>1. Code Awareness</b>												
Code posting/information		<b>FLA Principle of Monitoring, Obligation of Companies:</b> Establish and articulate clear, written workplace standards. Formally convey those standards to Company factories as well as to licensees, contractors and suppliers.	Although the Puma code of conduct is posted, Puma has not communicated or trained factory management on workplace standards.				Worker and Management interviews		Workplace standards are detailed in PUMA S.A.F.E. handbooks which have been provided to the factory. Further communication regarding the standards planned during the next audit in April 2006.	3/31/06	We will provide training to management representatives and workers on the CoC including workplace standards and applicable local laws	PUMA Reaudit in the factory is scheduled for November 2006
Worker/management awareness of Code		<b>FLA Principle of Monitoring, Obligation of Companies:</b> 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.	Per worker and management interviews, Puma has not conducted any code training. Workers and management are not aware of the code elements.				Worker and Management interviews	As above.		3/31/06	Puma CoC was posted on the notice boards and we distributed it in our local language to all employees and they had been trained about Puma code of conduct on workers. They will be reminded about in October 2006.	PUMA Reaudit in the factory is scheduled for November 2006
Confidential non-compliance reporting channel		<b>FLA Principle of Monitoring, Obligation of Companies:</b> 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 noncompliance with the workplace standards, with security that they shall not be punished or prejudiced for doing so.	There is no confidential reporting mechanism in place.				Worker and Management interviews	Stickers with contact information of PUMA S.A.F.E. team have been developed for Codes of Conduct. Stickers will be sent to the company for distribution on CoC posters.		2/28/06	We have received the stickers with the contact details of the PUMA S.A.F.E. Team and added those on the SAFE posters	Photograph of Code of Conduct poster with sticker in the factory received.
<b>2. Forced Labor</b>												
There will not be any use of forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise												
<b>3. Child Labor</b>												
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.												
<b>4. Harassment or Abuse</b>												
Every employee will be treated with respect and dignity. No employee will be subject to any physical, sexual, psychological or verbal harassment of abuse.												
Disciplinary Practices		Employers will utilize consistent written disciplinary practices that are applied fairly among all workers			Disciplinary practices are progressive but not systematically enforced.			The disciplinary practices are well mentioned in the workforce manual ad			The disciplinary practices are well mentioned in the workforce manual and it's in compliance with Tunisian Labor law	PUMA Reaudit in the factory is scheduled for November 2006
Record Maintenance		Employers will maintain written records of disciplinary actions taken.			Records of disciplinary actions are not maintained consistently.			Records should be maintained within personnel files.		2/28/06	All the records are maintained in the personnel file and they are always available.	PUMA Reaudit in the factory is scheduled for November 2006
<b>5. Nondiscrimination</b>												
No person will be subject 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, nationality, political opinion, or social or ethnic origin.												
<b>6. Health and Safety</b>												
Employers will provide a safe and healthy working environment to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of employer facilities												
Evacuation Procedure		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	Workers are blocked into their workspaces and cannot easily escape in the event of an emergency.				Visual Inspection	A fire evacuation exercise should be conducted to evaluate the time needed for evacuation.		3/31/06	The evacuation exercise have been already done in *** and *** we do have video records of the exercise the evacuation time is 70 seconds for *** and 40 second for ***	PUMA Reaudit in the factory is scheduled for November 2006
PPE		Workers shall wear appropriate protective equipment (such as gloves, eye protection, hearing protection, respiratory protection, etc.) to prevent unsafe exposure (such as inhalation or contact with solvent vapors, noise, dust, etc.) to hazardous elements including medical waste.	PPE for hearing protection is not used consistently and not enforced by management.				Visual Inspection and Management Interviews	Training should be given to workers on why it is important to use PPE. Adequateness of PPE provided should be verified.		2/28/06	The adequate protective equipment are provided to workers, the factories management are daily emphasizing on the importance of those equipment, the workers have signed an engagement to use and to keep clean the protective equipments	PUMA Reaudit in the factory is scheduled for November 2006

FLA Code/ Compliance issue	Country Law/Legal Reference	FLA Benchmark	IEM Findings						Remediation				
			Non-compliance	Risk of Non-compliance	Evidence of Non-compliance (un corroborated)	If not corroborated, explain why	Sources/Documentation used for corroborating	Notable Features Implemented by Factory Management or Company	PC Remediation plan	Target Completion Date	Factory Response (Optional)	Company follow up (Cite date of follow up)	
Ventilation/Electrical/facility maintenance		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	Factory lacks an adequate ventilation system.					Visual Inspection		As per PUMA S.A.F.E. handbooks, adequate ventilation needs to be provided.	3/31/06	Our Factories building have a high of 6 meters, the roofs are made out of special materials preventing from heat, the ambient temperature is always between 22° and 30° during the year those temperature are quite suitable for working. All our plumbing, electrical and lighting network are regularly inspected and properly maintained, we do have an annual inspection from an independent office *** after each visit inspection an action plan is set up and followed	PUMA Reaudit in the factory is scheduled for November 2006
Sanitation in Facilities		All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with applicable laws	Toilets and bathroom area is not sanitary. The number of bathroom stalls does not meet local requirements of 1 per 20 workers. There is only 1 operating stall for all female workers.					Visual Inspection		Legal requirements must be fulfilled. Regular cleaning and disinfection schedules required for all toilets and bathrooms	2/28/06	Actually we do have in *** : - 7 toilets for men ( 70 men's) 3 toilets for women( 31 women) In *** we do have : -18 toilets for women( 500 women) - 3 toilets for men ( 20 men) unfortunately we cannot build a new toilet but the number that we have is quite enough as we never have bounded toilet and there's no queue at any time of the day.	PUMA Reaudit in the factory is scheduled for November 2006
Sanitation in Dining Area		All food preparation shall be prepared, stored, and served in a sanitary manner in accordance with applicable laws. Safe drinking water should be available in each building.	Dining area is unsanitary.					Visual Inspection		Regular cleaning and disinfection schedules required.		There's no foods preparation on site and we do not provide any foods to our workers, we provide only the clan canteen and electrical heater. The dining area is cleaned once after the lunch break, FLA team have visited the dining room immediately after the lunch the workers has just left the place and the cleaning team was not yet on place	PUMA Reaudit in the factory is scheduled for November 2006
<b>7. Freedom of Association and Collective Bargaining</b>													
Employers will recognize and respect the right of employees to freedom of association and collective bargaining													
Compliance to local collective bargaining laws	Tunisian Labor Code, Section 157 and subsequent sections.	Employers will comply with all national and local laws and regulations concerning collective bargaining and free association. Where conflicts are known to exist, employers will use the standard that provides the greatest protection for workers.	A consultative committee (required by law) is not implemented in [Factory 1]					Management and Worker Interviews		A consultative committee should be elected.	3/31/06		PUMA Reaudit in the factory is scheduled for November 2006
Employer Interference/Elections	Tunisian Labor Code, Section 157 and subsequent sections.	Workers' organizations have the right to elect their representatives and conduct their activities without employer interference		Workers are not aware of the election process nor of the elected representatives of the consultative committee.						As above. All workers and employees should be informed about the election process.	2/28/06	The workers' committee is elected each 3 years, in [Factory 2] this structure exists already since 2 years. In [Factory 1] were this committee was not re-elected, the election is now in progress	PUMA Reaudit in the factory is scheduled for November 2006
Other	Tunisian Labor Code, Section 157 and subsequent sections.			Workers are not aware of the functions of the consultative committee. This includes elected representatives: they are not all aware of the purpose and function of the committee.	Although records indicate all workers participated in the elections of the consultative committee, worker interviews indicate otherwise.					As above.			PUMA Reaudit in the factory is scheduled for November 2006
<b>8. Wages and Benefits</b>													
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													
Time-recording system		Time worked by all employees, regardless of compensation system, will be documented by time cards or other accurate and reliable recording systems such as electronic swipe cards	Time recorder does not capture the exit times. Overtime hours are not adequately captured.							Time records must be complete with time in and out recorded for all workers and time records being available for a minimum period of one year.	2/28/06	We have new version software (a reliable time recording), this system is linked directly to the payroll.	PUMA Reaudit in the factory is scheduled for November 2006
Timely Payment		All compensation shall be paid in a timely manner	Payments to workers are up to 2 weeks late at times.					Worker and Management Interviews		Delayed payments should be avoided.	2/28/06	We never had a delay: our employees know already that the wages are paid in cash on the 10th of each months and not later.	PUMA Reaudit in the factory is scheduled for November 2006
<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 limit 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													
<b>10. Overtime Compensation</b>													

			IEM Findings					Remediation				
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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.												