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 14 in.) paper. To print the charts, please make sure to select “legal” size paper from Print properties.
**Child Labor**

- No communication channel
- Document review (logbook for new workers and training given to them)
- No training records or verification of training.

- FLA Code/Reference:
  - Country Law/Legal
  - FLA Audit Profile
  - Vietnam
  - FLA Benchmark Monitor’s Findings Documentation

- FLA Principle of Monitoring, Obligation of Employers:
  - All documents required to be available to workers (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.

- FLA Principle of Monitoring, Obligation of Management:
  - All documents required to be available to workers (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.

- FLA Principle of Monitoring, Obligation of Facility:
  - All documents required to be available to workers (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.

- FLA Principle of Monitoring, Obligation of Supervisors:
  - All documents required to be available to workers (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.

- FLA Principle of Monitoring, Obligation of Workers:
  - All documents required to be available to workers (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.

- FLA Principle of Monitoring, Obligation of Workers (Continued):
  - All documents required to be available to workers (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.

- FLA Principle of Monitoring, Obligation of Workers (Continued):
  - All documents required to be available to workers (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.

- FLA Principle of Monitoring, Obligation of Workers (Continued):
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- FLA Principle of Monitoring, Obligation of Workers (Continued):
  - All documents required to be available to workers (policies, MSDS, etc.) shall be made availa...
**Facility Location**: Hanoi, Vietnam

**Date of Visit**: May 29, 2005

**Purpose of Visit**: Visual inspection

**Company**: Factory Name

**Facility Description**: Factory uses few chemicals for factory cleaning near a window or with an exhaust system.

**Observed Conditions**:
- **Sanitation**: Factory Manager assured that a car is available. Many vehicles parked inside the compound.
- **Environmental Law Compliance**: Chemical Management Circular No. 23/2003/TT-TL.
- **Health and Safety**: Company follow-up document review, inspection, and interview.

**Key Findings**:
- **Sanitation**: Factory facilities are not kept properly. Toilets facilities are not kept properly.
- **Environmental Law Compliance**: 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.
- **Health and Safety**: A checklist provided at each first aid station and equipment was complete with details of earnings and deductions.

**Recommendations**:
- **Sanitation**: Clean area for the spot inspection, waste water treatment plant not yet fully operational, MSDS on work area not visible.
- **Environmental Law Compliance**: Interviewed workers confirmed that they had not had much overtime for a long time.
- **Health and Safety**: Pay all regular and overtime hours worked according to legal requirements.
### FLA Code/Compliance Issue

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<tbody>
<tr>
<td>FLA Code/Compliance issue</td>
<td>Country Law/Legal Reference</td>
<td>FLA Benchmark</td>
<td>Monitor’s Findings</td>
<td>FLA Benchmark Monitor's Findings Documentation (If finding was corroborated/verified through multiple sources, list all sources)</td>
<td>If not corroborated, explain why</td>
<td>Best Practice</td>
<td>Company Remediation plan</td>
<td>Target Completion Date</td>
<td>Factory Response (Optional)</td>
<td>Company follow up (May 24, 2005)</td>
<td>Documentation</td>
<td>Company follow up (September 30, 2005)</td>
<td>Documentation</td>
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<td>Overtime Compensation</td>
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<td>Employees will be paid for all hours worked in a workweek. Calculation of hours worked should exclude all time that the employer allows or requires the worker to work.</td>
<td>Boca OT is not recorded in timecards. Sources OT was worked from Jan to Nov 2004, but due to double recording, the factory made a double payment of OT compensation</td>
<td>Best Practice: Keep an accurate and complete records of all working hours, issue a written instruction to stop the practice of not recording overtime hours in absence of a written instruction, and communicate the new instruction to all staff about the new instruction and post the same on all bulletin boards to pay all regular and overtime hours worked according to legal requirements.</td>
<td>Apr. 30, 2005</td>
<td>a) Factory claims that working hours records are complete. Interviewed workers also confirmed that they had not had much overtime for a long time.</td>
<td>b) Factory complies with legal requirements on payment of overtime</td>
<td>Interview, document review</td>
<td>Another batch of interviewed workers and supervisors claim that they had not had much overtime for a long time.</td>
<td>Interview</td>
<td>Document review and interview</td>
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