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:** TURKEY  
**Factory name:** 36007617CIEM  
**GS:**  
**Date of audit:** 13-14 January 2004  
**Days in the facility:** 3 person days  
**PC(s):** PUMA  
**Number of workers:** 277 in ready-made + 135 in dyehouse  
**Product(s):** Apparel, fleece, hooded sweatshirt, teamwear, t-shirts, pants, shorts  
**Production processes:** Textile, cut, sew, embellish, finish package. Fabric dye, wash, dry, finish (dyehouse)

### FLA Code/Compliance issue

#### Worker/management awareness of Code

**FLA Principles of Monitoring, Obligations of Companies:**
- 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 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.

Although the code of conduct of the participating brand was posted on the notice boards, some of the interviewed workers were not aware of the content.

**Inspection all notice boards throughout the factory and individual/group interviews.**

All employees had been trained and reminded again about the Puma code of conduct on June 2005. Training attendance records have been kept, at the Quality Management and Industrial Relations.

All issues to be resolved within a period of 6 months.

#### 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.

Every employee will be treated with respect and dignity. No employee will be subject to any physical, sexual, psychological or verbal harassment of abuse.

#### Nondiscrimination

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.

#### Health and Safety

**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 completed with and workers shall be trained in proper safety, first aid, and evacuation procedures.

**Training records and interviews.**

Some of the trainings on preventive medicine (e.g., Diarrhea risk in the summer and dehydration, sunburn, fungus and fungicides, childcare, maternity, and family planning etc.) were provided by company doctor with necessary trainings on the workplace incidents/accidents and potential risks of chemicals currently used.

**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.

**Just level and air quality were not measured at the ready-made process. Steel sole shoes were not provided for dyehouse maintenance process workers.**

**Light tour, measurement or inspection reports.**

Air quality had been measured by the accredited engineering consultants [on] 03.01.2005. There haven't been any unacceptable results (The reports are kept at the maintenance department.). Steel-soled shoes are provided for.

All issues to be resolved within a period of 6 months.
Record Maintenance

- All safety and accident reports shall be maintained for at least one year, or longer if required by law.
- Inspection of the records in HR departments. Best Practice: Very comprehensive date and time lineage, including all contact details in a year according to factory statistics.

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.
- All sanitary rooms and warehouses have no scheduled disinfection period. The same glass was being used for drinking water at the dyeing process.
- Inspection of the records in relevant locations. Best Practice: A recycled glass waste (new use) is used for drinking water. Disinfection periods have been scheduled and conducted. All issues to be resolved within a period of 6 months.

Worker Participation

- Turkish Labor Law (TBL) No. 5023 states that an industrial organization which employs more than 50 workers and works more than 6 months constantly, should establish a health and safety committee. Employees shall carry out the decisions of this committee in the workplace. An employee health and safety engineer should be employed according to risk level of the industry sector.
- A competent health and safety engineer was not employed yet. November 2007. Work was being done by the responsible engineer. All issues to be resolved within a period of 6 months.
- Very comprehensive data analysis on confronted health problems in a year according to dyehouse statistics.
- Sanitation in Facilities: As per TBL, in workplace, when the female population raises 100-150, a nursing room should be provided maximum 250 meters away from the workplace. When the population over than 250, a creche should be founded for the accommodation of 0-6 aged children. No nursing room or creche implementation in the workplace yet. (Number of female workers were 223 in the ready-made plant + 17 in the dyehouse = 250 during audit dates.) Nursing rooms are provided, currently no further action required. Implementation of a creche should be considered for the future if number of female workers increases.

Other Benefits

- Turkish Labor Law (TBL) refers to pregnant or maternity women’s workable conditions and creche responsibility regulation clause 7: In a workplace, when the female population raises 150-250, a nursing room should be provided maximum 250 meters away from the workplace. When the population over than 250, a creche should be founded for the accommodation of the 0-6 aged children. No nursing room or creche implementation in the workplace yet. (Number of female workers were 223 in the ready-made plant + 17 in the dyehouse = 250 during audit dates.) Nursing rooms are provided, currently no further action required. Implementation of a creche should be considered for the future if number of female workers increases.

- Effective immediately.

Other/ Certified Quality Systems

- Both production plants have certified ISO 9001 Quality management system for product conformity; certified ISO 14001 Environmental Management system was also existing in the dyehouse.
- Monthly productivity was measurable for each employee in both production plants. This was considered for remuneration.

Other/ Freedom of Association and Collective Bargaining

- Employers will recognize and respect the right of employees to freedom of association and collective bargaining.

Other/ Wage and Benefits

- 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.
- Employers will recognize and respect the right of employees to freedom of association and collective bargaining.

Other/ Record Maintenance

- All legally required payroll documents, journals and reports will be available complete, accurate and up to date.
- The O/T records were not kept in the dyehouse within the last 3 months. Previous hard copy records were sent to central archive in Istanbul. The records were not easily available on the e-media either.
- The factory in Istanbul is the headquarters; all original records are kept at that factory. The software records have been checked at the other garment and dye plants. Dye plant is working two shifts, therefore there is no workstation at that factory. The software records have been checked at the other garment and dye plants. Dye plant is working two shifts, effective immediately.

9. Hours of Work

- Employers will recognize and respect the right of employees to freedom of association and collective bargaining.

- 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.
<table>
<thead>
<tr>
<th>FLA Code/ Compliance Issue</th>
<th>Legal Reference</th>
<th>FLA Benchmark</th>
<th>Monitor's Findings</th>
<th>Documentation</th>
<th>Best Practice</th>
<th>PC remediation plan</th>
<th>Target completion date</th>
<th>Factory Response</th>
<th>PC follow up</th>
<th>Documentation</th>
<th>Best Practice</th>
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</thead>
<tbody>
<tr>
<td>Overtime Limitations</td>
<td>Turkish Labor Law, Clause 41: O/T work shall not be over 270 hrs/year for each worker.</td>
<td>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.</td>
<td>O/T worked hours total of per employee were not traced clearly neither in the ready-made production nor in the dyehouse in year 2004. Some of the records were either around the determined quota or exceeding. (e.g. max. 442 hrs is seen; some others were 589, 273 hrs etc.)</td>
<td>Overtime compensation had to be clearly documented and traced; legal requirements including annual limitations need to be observed and fully complied with</td>
<td>Effective immediately Overtime records have been kept at all [of the factory's] plants, all records are clear and traceable.</td>
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<td>Miscellaneous</td>
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