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.
Employment Records

According to Schedule 1B of The Factories Act, 1948, the establishment shall maintain the register of workers, the register of birth, or doctors certificate, certified copy of date of birth as recorded in the registers of a municipality, local authority or panchayat or register of birth, or doctors certificate or affidavit.

FLA Code/ Compliance issue

1. Code Awareness

FLA Benchmark

None

Remediation

None

- Employment Records

According to Schedule 1B of The Factories Act, 1948, the establishment shall maintain the register of workers, the register of birth, or doctors certificate, certified copy of date of birth as recorded in the registers of a municipality, local authority or panchayat or register of birth, or doctors certificate or affidavit.

- Age Documentation

Employees will maintain proof of age documentation for all workers, such as a birth certificate, which verifies date of birth.

FLA Benchmark

None

Remediation

None

- Health and Safety

Employees will provide a safe and healthy working environment to prevent accidents and injury to health arising out of, linked with, or in the course of work or as a result of the operation of employer facilities.

FLA Benchmark

None

Remediation

None
<table>
<thead>
<tr>
<th></th>
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<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Emergency Procedure</td>
<td>According to Section 28(c) of The Factories Act, 1948, Every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work at factory. Without prejudice to the generality of the provisions of this section, the occupier shall ensure that, the provision of such information, instruction, training and supervision (including the provision of protective clothing and equipment where necessary) to ensure the health and safety of all workers at work.</td>
<td>Every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work at factory. Without prejudice to the generality of the provisions of this section, the occupier shall ensure that, the provision of such information, instruction, training and supervision (including the provision of protective clothing and equipment where necessary) to ensure the health and safety of all workers at work.</td>
<td>Visual emergency warning signs, exit signs, staircases, etc. should be provided and workers shall be trained in proper safety, first aid, and evacuation procedures</td>
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<tr>
<td>Evacuation Procedure</td>
<td>According to Section 28(c) of The Factories Act, 1948, Every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work at factory. Without prejudice to the generality of the provisions of this section, the occupier shall ensure that, the provision of such information, instruction, training and supervision (including the provision of protective clothing and equipment where necessary) to ensure the health and safety of all workers at work.</td>
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<td></td>
</tr>
<tr>
<td>Hazard/Rescue Facility Maintenance</td>
<td>According to the Model Rules of The Factories Act, 1948, The scale shall be clearly visible and suitably protected and suitable means of lighting is to be arranged for this purpose, to maintain the required illumination in case of failure of the normal source of electric supply.</td>
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<td>First aid, fire extinguishers, etc. shall be provided and maintained as prescribed and accessible to the employees.</td>
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<td></td>
</tr>
<tr>
<td>Safety Equipment</td>
<td>According to Section 21 of The Factories Act, 1948, there shall be in every factory, an adequate system of air, water and electricity to be equally available to all machinery; the electric supply shall be so arranged, whatever artificial illumination is to be adopted for this purpose, to maintain the required illumination in case of failure of the normal source of electric supply.</td>
<td>According to Section 21 of The Factories Act, 1948, there shall be in every factory, an adequate system of air, water and electricity to be equally available to all machinery; the electric supply shall be so arranged, whatever artificial illumination is to be adopted for this purpose, to maintain the required illumination in case of failure of the normal source of electric supply.</td>
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<td></td>
</tr>
<tr>
<td>Fire Safety and Safety Layout</td>
<td>According to Section 61(1) of The Factories Act, 1948, The maximum safe working load that the premises are marked on, on every load or lift, and no load greater than such load shall be carried therein.</td>
<td>According to Section 61(1) of The Factories Act, 1948, The maximum safe working load that the premises are marked on, on every load or lift, and no load greater than such load shall be carried therein.</td>
<td>Safety instructions and evacuation procedures to be posted near the entrance/gate of the goods lift.</td>
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<td></td>
</tr>
</tbody>
</table>

**Notes:**
- N/A: Not applicable.
- Non-compliance: FLA Benchmark is not being complied with.
- Remediation: Actions being taken to ensure FLA Benchmark is complied with.

**Evidence of Non-Compliance:**
- FLA Benchmark: FLA Benchmark is not being complied with.
- FLA Noncompliance: FLA Noncompliance identified.
- FLA Compliance: FLA Compliance identified.

**Remediation:**
- FLA Benchmark: Remediation steps being taken to ensure FLA Benchmark is complied with.
- FLA Noncompliance: Remediation steps being taken to ensure FLA Noncompliance is addressed.
- FLA Compliance: Remediation steps being taken to ensure FLA Compliance is maintained.

**Timeline:**
- FLA Benchmark: Remediation steps being taken to ensure FLA Benchmark is complied with.
- FLA Noncompliance: Remediation steps being taken to ensure FLA Noncompliance is addressed.
- FLA Compliance: Remediation steps being taken to ensure FLA Compliance is maintained.
<table>
<thead>
<tr>
<th>Issue</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minimum Wages</td>
<td>Workers shall be paid at least the minimum wage required by local law or the prevailing industry wage, whichever is higher.</td>
</tr>
<tr>
<td>Right to Freedom of Association</td>
<td>Employers will recognize and respect the right of employees to freedom of association and collective bargaining.</td>
</tr>
<tr>
<td>Freedom of Association and Collective Bargaining</td>
<td>Employees will have the right to establish and, subject only to the rules of the organization concerned, to join organizations of their own choosing without previous authorization. The right to freedom of association begins at the time that a worker seeks employment, and continues through the course of employment.</td>
</tr>
<tr>
<td>Sanitation in Facilities</td>
<td>All facilities including factory buildings, toilets, canteens, kitchens, and clinics shall be kept clean and safe and be in compliance with applicable laws.</td>
</tr>
<tr>
<td>PPE</td>
<td>Workers shall wear appropriate protective equipment (such as gloves, eye protection, hearing protection, respiratory protection, etc.) to minimize exposure to or handling of the chemicals and hazardous substances.</td>
</tr>
<tr>
<td>Chemical Management</td>
<td>All chemicals and hazardous substances shall be properly labeled and stored in accordance with applicable laws.</td>
</tr>
<tr>
<td>Record Maintenance</td>
<td>All legally required payroll documents, journals and reports will be available complete, accurate and up-to-date. All legally required documentation is available in the factory.</td>
</tr>
</tbody>
</table>

**FLA Benchmark Compliance**

- **Country Law/Legal Reference**
  - Available complete, accurate and up-to-date. (In the United States, the Department of Labor is the governing authority for employment standards.)
  - All legally required payroll documents, journals and reports will be available complete, accurate and up-to-date. All legally required documentation is available in the factory.

**Evidence of Non-Compliance**

- **IEM Findings**
  - N/A

**Company Response (Optional)**

- **Factory**
  - N/A
  - N/A
  - N/A
  - N/A

**Remediation**

- **Date**
  - Dec-05
  - Jul-06
  - Dec-05
  - Jul-06

**Target Completion**

- **Date**
  - Nov-05
  - Jul-06
  - Nov-05
  - Jul-06

**Audit**

- **Completed**
  - N/A
  - N/A
  - N/A
  - N/A

**Company**

- **Name**
  - N/A
  - N/A
  - N/A
  - N/A

**Further Information**

- **Source**
  - N/A

**Certification**

- **Authority**
  - FLA Benchmark

- **Signed By**
  - N/A

- **Date**
  - N/A

- **Location**
  - N/A

**Notes**

- N/A

**Additional Notes**

- N/A
### Hours of Work

**Exemption from Overtime Limitations**

Except in extraordinary business circumstances, employees will:

1. 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 plus 12 hours overtime; and (ii) be entitled to at least one day off in every seven day period.

**Wage records**

- **Requirements:**
  - 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.
  - Wage records for overtime work need to be maintained on file for at least one year.
  - Wage records for all work performed by those workers working for 12 hours a day need to be maintained on file for at least one day off per week.

**Non-compliance**

- **IEM Findings:**
  - auditor has found that all attendance cards are now available for review and records are being accurately maintained.

### FLA Code/Compliance Issue

**FLA Benchmark**

- **PC Remediation plan**
  - Some workers had replacement cards available for review and records are being accurately maintained.

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<table>
<thead>
<tr>
<th>FLA Code/ Compliance Issue</th>
<th>Country Law/Legal Reference</th>
<th>FLA Benchmark</th>
<th>Non-compliance</th>
<th>Risk of Non-compliance</th>
<th>Evidence of Non-compliance</th>
<th>Sources/Documentation used for corroborating</th>
<th>Notable Features implemented by Factory</th>
<th>PC Remediation Plan</th>
<th>Target Completion Date</th>
<th>Factory Response (Optional)</th>
<th>Company follow up (Cite date of Documentation)</th>
</tr>
</thead>
<tbody>
<tr>
<td>10. Overtime Compensation</td>
<td>According to Section 13A (1) of The Payment of Wages Act, 1936, Every employer shall maintain such register and records giving such particulars of persons employed by him, the work performed by them, the wages paid to them, the deductions made from their wages, the receipts given by them and such other particulars and in such form as may be prescribed. Employees will be paid for all hours worked in a workweek. Calculation of hours worked must include all time that the employer allows or requires the worker to work. Wage records for overtime work performed by those workers working for 12 hours a day and work performed on weekly off days are not made available to the auditors. Review of production and in and out time records. None. Wage records for all overtime work need to be maintained on file at all times. Factory needs to implement a system to ensure missing records do not occur. December 1, 2005. Some workers had misplaced their attendance cards but replacement cards have been made available to those workers. July 28, 2006. Auditor has found that all attendance cards are now available for review and records are being accurately maintained. Workers are being paid correctly for all hours worked.</td>
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Miscellaneous: 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 of at least equal to their regular hourly compensation. According to Section 13A (1) of The Payment of Wages Act, 1936, Every employer shall maintain such register and records giving such particulars of persons employed by him, the work performed by them, the wages paid to them, the deductions made from their wages, the receipts given by them and such other particulars and in such form as may be prescribed. Employees will be paid for all hours worked in a workweek. Calculation of hours worked must include all time that the employer allows or requires the worker to work. Wage records for overtime work performed by those workers working for 12 hours a day and work performed on weekly off days are not made available to the auditors. Review of production and in and out time records. None. Wage records for all overtime work need to be maintained on file at all times. Factory needs to implement a system to ensure missing records do not occur. December 1, 2005. Some workers had misplaced their attendance cards but replacement cards have been made available to those workers. July 28, 2006. Auditor has found that all attendance cards are now available for review and records are being accurately maintained. Workers are being paid correctly for all hours worked.