

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 Monitoring Visit Profile	
Country	USA
Factory name	130082135B
IEM	ALGI
Date of audit	9/16/03
Days in the facility	1
PC(s)	Zephyr Graphics
Number of workers	10
Product(s)	Caps(hats)
Production processes	Steaming, packing
Other brands in factory	None

FLA Code/ Compliance issue	Findings					Remediation				
	Legal Reference	FLA Benchmark	Monitor's Findings	Documentation	Best Practice	PC remediation plan	Target Completion Date	Factory Response	PC follow up	Documentation
1. Code Awareness										
Code posting/information		FLA Principles of Monitoring, Obligations of Companies: Establish and articulate clear, written workplace standards. Formally convey those standards to Company factories as well as to licensees, contractors and suppliers.	Employer has never received FLA code of conduct	Management interview and observation of the facility.		Company will provide for each employee and post a copy of the FLA code of conduct. Company will provide proof through photos of postings, and signed employee documents	12/20/03			
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 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.	Employer and employees are unaware of the Code of Conduct	Employee and management interviews.		Company will inform existing employees via a company meeting discussing the FLA workplace standards. The principles should then be reviewed with each new hire, and at least once a year with each employee. Company will provide proof by signed employee documents.	12/20/03			
Confidential non-compliance reporting channel		FLA Principles of Monitoring, Obligations of Companies: 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 non-compliance reporting channel.			Company will develop a non-compliance reporting channel with security to ensure no retribution or punishment for employee reporting. Company will explain and provide the plan to each employee. Company will make the plan available and provide proof of the plan's implementation.	12/20/03			
2. Forced Labor										
3. 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.										
4. Harassment or Abuse										
Every employee will be treated with respect and dignity. No employee will be subject to any physical, sexual, psychological or verbal harassment of abuse.										
5. Nondiscrimination										
6. Health and Safety										
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										
Fire Safety Health and Safety legal compliance		Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits	There are an insufficient number of fire extinguishers for the size of the facility	Visual observation		Company to outfit facilities with fire extinguishers sufficient to the building as required by law and the code of conduct. Company will obtain all legally required permits. As proof company will provide photos of installed fire extinguishers and copies of required permits.	12/20/03			

FLA Code/ Compliance issue	Findings					Remediation				
	Legal Reference	FLA Benchmark	Monitor's Findings	Documentation	Best Practice	PC remediation plan	Target Completion Date	Factory Response	PC follow up	Documentation
Document Maintenance/ Accessibility		All documents required to be available to workers and management by applicable laws (such as 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	The firm has not developed a written emergency action plan	Visual observation, employer interview		Company to generate a thorough emergency action plan followed by physical evacuation. Plan to be explained and signed by all employees. Provide proof of evacuation by way of photographs.	12/20/03			
7. Freedom of Association and Collective Bargaining										
Employers will recognize and respect the right of employees to freedom of association and collective bargaining										
Other			There is no written Freedom of Association Policy	Records review, employer and employee interviews		Company to inform employees of their rights by providing for each employee and posting the FoA policy. Provide proof by way of signed document from employees that they have received the FOA policy.	12/20/03			
8. Wages and Benefits										
9. Hours of Work										
10. 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.										
OT Compensation	California labor law mandates overtime wages after 8 hours worked on a daily basis (double time after 12 hours and Sundays), regardless of weekly overtime worked.	The factory shall comply with applicable law for premium rates for overtime compensation	Employer pays overtime after 40 hours worked in a workweek, but overtime is not considered on a daily basis for employees working in excess of 8 hours per day.	Review of payroll records, employer and employee interviews.		Company will pay overtime wages as mandated by California Labor Law. Review payroll records for the past 3 months and issue retroactive payments as necessary. Company will provide proof of payments via financial documents	12/20/03			
OT Compensation Awareness		Workers shall be informed about overtime compensation rates, by oral and printed means	Employees were unaware of California Labor Law requirements. Minimum wage poster was not displayed as required.			Company will post all posters required by law including Minimum Wage and any other Labor Law Posters. Company will provide proof of postings with photos.	12/20/03			
Miscellaneous										