

## FLA Audit Profile

Factory Code	400076921G
Country	Turkey
FLA Affiliate	Asics
Monitor	CSCC (STR Responsible Sourcing)
Audit Date	October 15-16, 2008
Products	Casual Wear Cutting, sewing, Ironing, Packing, Quality
Processes	Control
Number of Workers	57



**FAIR LABOR**  
ASSOCIATION™

*FLA Comment: This report was submitted to the FLA and the FLA affiliated company by the accredited independent external monitor. Despite deadline reminders and extensions for submission of a corrective action plan, the FLA has not received a plan to address the noncompliances raised in the report. Therefore, the report is posted in its current state and will be updated once a corrective action plan has been submitted to and reviewed by the FLA.*

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**Wages, Benefits and Overtime Compensation: No Sub-header**

K.1 The facility provides all legally required benefits to all eligible workers. (I) (O) (D)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	Fail

**Explanation:** 27 out of 57 employees are not listed on social security payroll as they are not registered to state's social security. The management was advised to make sure that all the employees are registered to state's social security from the first day of work as per the Social Security Law, Article 6.

- Plan Of Action:**
- Deadline Date:**
- Supplier CAP:**
- Supplier CAP Date:**
- Action Taken:**
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- Plan Complete Date:**
- Action Verified:**
- Action Verified Text:**
- Action Verified Date:**
- Comments:**

SOCIAL & MEDICAL INSURANCE: One or more of the following conditions are present: (1) Factory does not make any contributions to the social insurance / medical insurance / pension scheme(s) as required by local law. (2) Factory does not pay the correct amounts on behalf of workers into the scheme / Factory does not make the proper employer contributions into the scheme [Provide details of what the scheme is]. (Reference: Employment Guideline Part Two Chapter 5 page 4, 8-9 of 12)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	Fail

**Explanation:** 27 out of 57 employees are not listed on social security payroll as they are not registered to state's social security. The management was advised to make sure that all the employees are registered to state's social security from the first day of work as per the Social Security Law, Article 6.

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- Supplier CAP:**
- Supplier CAP Date:**
- Action Taken:**

Plan Complete:  
 Plan Complete Date:  
 Action Verified:  
 Action Verified Text:  
 Action Verified Date:  
 Comments:

## Wages, Benefits and Overtime Compensation: Social & Medical Insurance

Factory does not make any contributions to the social insurance / medical insurance / pension scheme(s) as required by local law. (Please refer to Employment Guideline Part Two Chapter 5 page 4, 8-9 of 12)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	Fail

**Explanation:** 27 employee's social security contributions are not paid to the government, as they are not registered to state's social security and they are not listed on official documentation; in violation with Social Security Law, Articles 6 and 77.

Plan Of Action:  
 Deadline Date:  
 Supplier CAP:  
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 Action Taken:  
 Plan Complete:  
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 Action Verified Text:  
 Action Verified Date:  
 Comments:

Factory does not pay the correct amounts on behalf of workers into the social/medical insurance or pension scheme. (Please refer to Employment Guideline Part Two Chapter 5 page 4, 8-9 of 12)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	Fail

**Explanation:** The officially registered employees actual salaries and overtime compensation are not listed on social security payroll in order to pay less tax to the government; in violation with Social Security Law, Article 77.

**Plan Of Action:**  
**Deadline Date:**  
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**Action Taken:**  
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**Action Verified Date:**  
**Comments:**

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**Wages, Benefits and Overtime Compensation: A. General Compliance Wages, Benefits and Overtime Compensation**

WBOT.1 Employers shall comply with all local laws, regulations and procedures concerning the payment of wages and benefits, including overtime compensation. In any case where laws and the FLA Code are contradictory, the standard that provides the greatest protection for workers shall apply. Where provisions are lacking, employers shall take measures to reasonably accommodate matters concerning the payments of wages and benefits, including overtime compensation. (S)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** [The facility keeps two sets of payroll documentation in order to pay fewer taxes. The management team was advised to make sure that actual and overtime compensations of all employees are listed on social security payroll as per Social Security Law, article 77.](#)

**Plan Of Action:**  
**Deadline Date:**  
**Supplier CAP:**  
**Supplier CAP Date:**  
**Action Taken:**  
**Plan Complete:**  
**Plan Complete Date:**  
**Action Verified:**  
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**Action Verified Date:**  
**Comments:**

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**Wages, Benefits and Overtime Compensation: B. Minimum Wage**

WBOT.2 Employers shall pay workers at least the legal minimum wage or the prevailing industry wage, whichever is higher. (S)

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Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** The actual payroll of only August and September 2008 were provided for review. It was noted that 4 employees in August 2008 and 9 employees in September 2008 received below the minimum wage. The management team was advised to make sure that legal minimum wage is provided to all employees as per Turkish Labor Law, article 39.

**Plan Of Action:**

**Deadline Date:**

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**Supplier CAP Date:**

**Action Taken:**

**Plan Complete:**

**Plan Complete Date:**

**Action Verified:**

**Action Verified Text:**

**Action Verified Date:**

**Comments:**

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## Wages, Benefits and Overtime Compensation: F. Payment for All Hours Worked

WBOT.7 Workers shall 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. (S)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** The employees work 48 hours per week while the labor law article 63 limits regular hours to 45 per week. The additional hours after 48 weekly hours are considered as overtime instead of 45. The management team was advised to make sure that all the additional hours after 45 weekly hours are considered and paid as overtime as per the labor law article 41.

**Plan Of Action:**

**Deadline Date:**

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**Plan Complete Date:**

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 Comments:

### Wages, Benefits and Overtime Compensation: I. Premium/Overtime Compensation

WBOT.10 The factory shall comply with all applicable laws, regulations and procedures governing the payment of premium rates for work on holidays, rest days, and overtime. (S)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** For overtime payment, hourly rate of the employees is calculated by dividing the salary to 240 instead of 225. The management was advised to make sure that hourly rate is calculated by dividing the salary to 225 as per the labor law articles 46 and 63.

Plan Of Action:  
 Deadline Date:  
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 Action Taken:  
 Plan Complete:  
 Plan Complete Date:  
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 Action Verified Date:  
 Comments:

### Wages, Benefits and Overtime Compensation: L. Voluntary Wage Deductions

FLA WBOT.13. All legally mandated deductions for taxes, social insurance, or other purposes shall be deposited each pay period in the legally defined account or transmitted to the legally defined agency. This includes any lawful garnishments for back taxes, etc. The employer shall not hold over any of these funds from one pay period to the other unless the law specifies that deposits are to be made less frequently than pay periods (e.g., monthly deposits, weekly pay). If the law does not specify, then deposits shall be made before the next pay period in all cases.

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	Fail

**Explanation:** The facility keeps two sets of payroll documentation in order to pay less tax to the government. All the employees listed as receiving minimum wage and no overtime is listed on the official documentation. The taxes and social insurance are paid accordance with that inaccurate official payroll documentation and 27 employees are not listed on social security which means that the facility does not pay any contribution for these employees to the government. The management team was advised to make sure that actual and overtime compensations of all employees are listed on social security payroll as per Social Security Law, article 77.

**Plan Of Action:**  
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**Action Verified Date:**  
**Comments:**

**Wages, Benefits and Overtime Compensation: M. Voluntary Wage Deductions/Worker Access to Information**

WBOT.15 Workers shall have access to regular and full information concerning the status of relevant accounts and the status and level of their payments thereto. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** The employees interviewed reported that they did not receive pay slips with the payments. The management team stated that they cannot provide the pay slips because they did not want to reveal evidence verifying that there are two sets of payrolls in the facility. It was advised to make sure that pay slips are provided to all employees as per the labor law article 37.

**Plan Of Action:**  
**Deadline Date:**  
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**Action Verified Date:**  
**Comments:**



**Wages, Benefits and Overtime Compensation: N. Accurate Calculation and Recording of Wage Compensation**

WBOT.17 All payments to workers, including hourly wages, piecework, benefits, bonuses, and other incentives shall be calculated and recorded accurately. (S)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** The actual payroll documentation of August and September 2008 were provided, while the other months' payroll registers are destroyed after each payment period according to the management team. It was advised that the factory ensure that payrolls for previous months are kept for future assessments.

- Plan Of Action:**
- Deadline Date:**
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**Wages, Benefits and Overtime Compensation: O. False Payroll Records**

WBOT.19 Employers shall not use hidden or multiple payroll records in order to hide overtime, to falsely demonstrate hourly wages, or for any other fraudulent reason. Payroll records maintained shall be authentic and accurate. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** It was noted that the facility keeps two sets of payroll documentation in order to pay less tax to the government. All the employees listed as receiving minimum wage and no overtime is listed on the official documentation. The taxes and social insurance are paid accordance with that inaccurate official payroll documentation. The management team was

advised to make sure that actual and overtime compensations of all employees are listed on social security payroll as per Social Security Law, article 77.

**Plan Of Action:**  
**Deadline Date:**  
**Supplier CAP:**  
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**Plan Complete Date:**  
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**Action Verified Date:**  
**Comments:**

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### **Wages, Benefits and Overtime Compensation: P. Payroll Record Maintenance/Worker Acknowledgement**

WBOT.20 All compensation records shall be maintained accurately and shall be acknowledged by the worker as accurate. (P)

<b>Audit Date</b>	<b>Audit Type</b>	<b>Audit Scope</b>	<b>Auditor</b>	<b>Score</b>
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** The actual payroll documentation of only August and September 2008 were provided as the other months payroll registers are destroyed after each payment period according to the management team. It was advised to make sure that payrolls for previous months are not destroyed and available in future assessments. Moreover, the employees interviewed reported no receiving pay-slips with the payments. The management team stated that they cannot provide the pay-slips in order not to give evidence to the employees verifying that there are two sets of payroll practice in the facility. It was advised to make sure that pay-slips are provided to all employees as per the labor law article 37.

**Plan Of Action:**  
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**Action Verified Date:**  
**Comments:**

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## Wages, Benefits and Overtime Compensation: Q. Record Maintenance

WBOT.21 Employers shall ensure that all legally required payroll documents, journals and reports are available, complete, accurate and up-to-date. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** The actual payroll documentation of August and September 2008 were provided as the other months payroll registers are destroyed after each payment period according to the management team. It was advised that the factory ensure that payrolls for previous months are kept for future assessments.

**Plan Of Action:**

**Deadline Date:**

**Supplier CAP:**

**Supplier CAP Date:**

**Action Taken:**

**Plan Complete:**

**Plan Complete Date:**

**Action Verified:**

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**Action Verified Date:**

**Comments:**

## Wages, Benefits and Overtime Compensation: R. Worker Wage Awareness

WBOT.22 Employers shall make every reasonable effort to ensure workers understand the wages, including the calculation of wages, incentives systems, benefits and bonuses they are entitled to in a factory and under applicable laws. To this end, employers shall communicate orally and in writing to all workers all relevant information in the local language or language(s) spoken by the workers, if different from the local language. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** The employees interviewed reported no receiving pay-slips with the payments. The management team stated that they cannot provide the pay slips because they did not wish to give evidence to the employees that there are two sets of payroll practice in the facility. It was advised to make sure that pay-slips are provided to all employees as per the labor law

article 37.

Plan Of Action:  
 Deadline Date:  
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 Comments:

### Wages, Benefits and Overtime Compensation: V. Pay Statement

WBOT.26 Employers shall provide workers a pay statement each pay period, which shall show earned wages, wage calculations, regular and overtime pay, bonuses, all deductions and final total wage. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** The employees interviewed reported no receiving pay slips with the payments. The management team stated that they cannot provide the pay slips in order not to give evidence to the employees verifying that there are two sets of payroll practice in the facility. It was advised to make sure that pay slips are provided to all employees as per the labor law article 37.

Plan Of Action:  
 Deadline Date:  
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 Comments:

### Wages, Benefits and Overtime Compensation: Y. Other - Wages, Benefits and Overtime Compensation

Other

Audit Date	Audit Type	Audit Scope	Auditor	Score
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400076921G – Turkey: Asics

10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)
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**Explanation:** The payroll documentation of the in-house subcontractor company was not provided. Nor is it monitored by the facility.

**Plan Of Action:**

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**Supplier CAP Date:**

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**Comments:**

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### Forced Labor: C. Employment Terms/Voluntary Agreement

F.3 Employment terms shall be those to which the worker has voluntarily agreed, in as far as those terms do not fall below provisions of local laws, freely negotiated and valid collective bargaining agreements, or the FLA Code. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** 27 employee's personnel files and contracts are missing. Moreover, it was noted that 30 employees were not provided copies of their contracts. The management was advised to make sure that work contracts are issued, and that copies are distributed to all employees as per the labor law article 8.

**Plan Of Action:**

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**Supplier CAP:**

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**Comments:**

## Forced Labor: I. Employment Records

F.9 Employers shall maintain sufficient hiring and employment records to demonstrate and verify compliance with this Code provision. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** 27 employee's personnel files and contracts are missing. Moreover, it was noted that 30 employees were not provided copies of their contracts. The management was advised to make sure that work contracts are issued, and that copies are distributed to all employees as per the labor law article 8.

**Plan Of Action:**

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**Supplier CAP:**

**Supplier CAP Date:**

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**Plan Complete:**

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**Comments:**

## Forced Labor: R. Other - Forced Labor

Other

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** Contracts are not issued to the nearly 20 in-house subcontracted employees.

**Plan Of Action:**

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 Comments:

### Freedom of Association: Z. Grievance Procedure

FOA.26 Employer shall have in place written grievance procedures that allow first an attempt to settle grievances directly between the worker and the immediate supervisor but that, where this is inappropriate or has failed, it is possible for the worker to have the grievance considered at one or more steps, depending on the nature of the grievance and the structure and size of the enterprise. Employers shall ensure that the grievance procedures and applicable rules are known to workers.  
 (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** [The factory does not have written grievance procedures. The management was advised to make sure that written grievance procedures are in place.](#)

Plan Of Action:  
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 Supplier CAP:  
 Supplier CAP Date:  
 Action Taken:  
 Plan Complete:  
 Plan Complete Date:  
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 Comments:

### Freedom of Association: ZB. Other - Freedom of Association and Collective Bargaining

Other

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** [There is no worker representative, internal comment or grievance system through which workers can raise issues of concern to factory management. The factory does not have a written policy recognizing and respecting or supporting freedom of association and collective bargaining.](#)

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**Action Verified Date:**  
**Comments:**

### Harassment or Abuse: B. Discipline/Progressive Discipline

H&A.2 Employers shall have a written system of progressive discipline (e.g., a system of maintaining discipline through the application of escalating disciplinary action moving, for instance, from verbal warnings to written warnings to suspension and finally to termination). Any exceptions to this system (e.g., immediate termination for gross misconduct, such as theft or assault) shall also be in writing and clearly communicated to workers. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** The disciplinary rules of the factory are not communicated with all workers, as there are several articles on disciplinary rules in the contracts; however 27 employees have not signed a contract and the other employees who signed the contract are not provided a copy of it. The management was advised to make sure that disciplinary rules of the factory are communicated with all workers.

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**Action Verified Date:**  
**Comments:**

### Harassment or Abuse: E. Discipline/Written Disciplinary System

H&A.5 Employers shall maintain a system of written disciplinary rules, procedures and practices. Disciplinary rules, procedures and practices shall be clearly communicated to all workers. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA	STR -	1 (out of 5)



Independent External Monitoring  
Specialized Technology Resources, Inc. [Previously CSCC]

**Explanation:** Disciplinary rules, procedures and practices are not communicated with the workers.

**Plan Of Action:**

**Deadline Date:**

**Supplier CAP:**

**Supplier CAP Date:**

**Action Taken:**

**Plan Complete:**

**Plan Complete Date:**

**Action Verified:**

**Action Verified Text:**

**Action Verified Date:**

**Comments:**

**Harassment or Abuse: Q. Other - Harassment or Abuse**

Other

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** Harassment and abuse policy or procedure is missing in the factory.

**Plan Of Action:**

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**Plan Complete:**

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**Comments:**

**Child Labor: A. General Compliance Child Labor**

CL.1 Employers shall comply with all local laws, regulations and procedures concerning the prohibition of child labor. (S)

Audit Date	Audit Type	Audit Scope	Auditor	Score
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**400076921G – Turkey: Asics**

10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)
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**Explanation:** Personnel files with sufficient age documentation for 27 of employees and 20 of in-house subcontractor employees are missing. Moreover, young employees work the same hours as the regular employees. The management was advised to make sure that proper personnel files with all the necessary documentation are issued for all employees as per the labor law article 75 and young employees work hours do not exceed 8 hours per day, 40 hours per week as per the labor law article 71 and they do not work at night hours as per the labor law article 73.

- Plan Of Action:**
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- Plan Complete Date:**
- Action Verified:**
- Action Verified Text:**
- Action Verified Date:**
- Comments:**

**Child Labor: C. Proof of Age Documentation**

CL.3 Employers shall collect and maintain all documentation necessary to confirm and verify date of birth of all workers, such as birth certificates. In addition, the employers shall take reasonable measures to ensure such documentation is complete and accurate. (P)

<b>Audit Date</b>	<b>Audit Type</b>	<b>Audit Scope</b>	<b>Auditor</b>	<b>Score</b>
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** Personnel files with sufficient age for 27 of employees and 20 of in-house subcontractor employees' documentation are missing. The management was advised to make sure that proper personnel files with all the necessary documentation are issued for all employees as per the labor law article 75.

- Plan Of Action:**
- Deadline Date:**
- Supplier CAP:**
- Supplier CAP Date:**
- Action Taken:**
- Plan Complete:**
- Plan Complete Date:**

**Action Verified:**  
**Action Verified Text:**  
**Action Verified Date:**  
**Comments:**

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### Child Labor: D. Other Means of Age Verification

CL.4 In those cases where proof of age documentation is not readily available or unreliable, employers shall take all necessary precautions which can reasonably be expected of them to ensure that all workers are at least the minimum working age, including requesting and maintaining medical or religious records of workers, or through other means considered reliable in the local context. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** [No documentation was available for 27 employees and 20 in-house subcontractor employees.](#)

**Plan Of Action:**  
**Deadline Date:**  
**Supplier CAP:**  
**Supplier CAP Date:**  
**Action Taken:**  
**Plan Complete:**  
**Plan Complete Date:**  
**Action Verified:**  
**Action Verified Text:**  
**Action Verified Date:**  
**Comments:**

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### Child Labor: E. Government Permits and Parental Consent Documentation

CL.5 Employers shall abide by all relevant rules and procedures where the law requires government permits or permission from parents as a condition of employment, and shall keep documentation on-site for inspection at all times. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** [No documentation is maintained for 27 employees and 20 in-house](#)

subcontractor employees.

**Plan Of Action:**  
**Deadline Date:**  
**Supplier CAP:**  
**Supplier CAP Date:**  
**Action Taken:**  
**Plan Complete:**  
**Plan Complete Date:**  
**Action Verified:**  
**Action Verified Text:**  
**Action Verified Date:**  
**Comments:**

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### Child Labor: F. Employment of Young Workers

CL.6 Employers shall comply with all relevant laws that apply to young workers (i.e., those between the minimum working age and the age of 18) including regulations relating to hiring, working conditions, types of work, hours of work, proof of age documentation, and overtime. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** Young employees work the same hours as the regular employees. The management was advised to make sure that young employees work hours do not exceed 8 hours per day, 40 hours per week as per the labor law article 71 and they do not work at night, as per the labor law article 73.

**Plan Of Action:**  
**Deadline Date:**  
**Supplier CAP:**  
**Supplier CAP Date:**  
**Action Taken:**  
**Plan Complete:**  
**Plan Complete Date:**  
**Action Verified:**  
**Action Verified Text:**  
**Action Verified Date:**  
**Comments:**

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### Child Labor: H. Young Worker Identification System

CL.8 Employers shall have a system for identifying work stations and operations that are inappropriate for young workers according to applicable laws. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA	STR -	1 (out of 5)

400076921G – Turkey: Asics

Independent External Monitoring Specialized Technology Resources, Inc. [Previously CSCC]

**Explanation:** The factory does not have a system for identifying work stations and operations that are inappropriate for young workers, according to law requirements.

**Plan Of Action:**

**Deadline Date:**

**Supplier CAP:**

**Supplier CAP Date:**

**Action Taken:**

**Plan Complete:**

**Plan Complete Date:**

**Action Verified:**

**Action Verified Text:**

**Action Verified Date:**

**Comments:**

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### Child Labor: M. Other - Child Labor

Other

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** There is no child labor policy in the facility.

**Plan Of Action:**

**Deadline Date:**

**Supplier CAP:**

**Supplier CAP Date:**

**Action Taken:**

**Plan Complete:**

**Plan Complete Date:**

**Action Verified:**

**Action Verified Text:**

**Action Verified Date:**

**Comments:**

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### Non-Discrimination: O. Other - Non-Discrimination

Other

Audit Date	Audit Type	Audit Scope	Auditor	Score
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400076921G – Turkey: Asics

10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	2 (out of 5)
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**Explanation:** There is no non-discrimination policy or procedure in the facility. 27 employee and 20 in-house Aytteks's employees are not registered to state's social security. The employees reported that they are not aware of any requirements to be registered to state's social security and the management reported that they are registered to state's social security through their performance. The management stated that they do not register all the employees as it would be a burden to pay the taxes and benefits of the employees. Price pressure leads them not to register the employees to social security according to the management; however it was not possible to verify how the management decides which employee to register state's social security.

- Plan Of Action:**
- Deadline Date:**
- Supplier CAP:**
- Supplier CAP Date:**
- Action Taken:**
- Plan Complete:**
- Plan Complete Date:**
- Action Verified:**
- Action Verified Text:**
- Action Verified Date:**
- Comments:**

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### Miscellaneous: A. Code Awareness

GEN.1 Establish and articulate clear, written workplace standards. Formally convey those standards to Company factories as well as to licensees, contractors and suppliers.

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** The Company's Code of Conduct poster is not provided and posted in the factory.

- Plan Of Action:**
- Deadline Date:**
- Supplier CAP:**
- Supplier CAP Date:**
- Action Taken:**
- Plan Complete:**
- Plan Complete Date:**

**Action Verified:**  
**Action Verified Text:**  
**Action Verified Date:**  
**Comments:**

GEN.2 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.

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** [The Company's Code of Conduct poster is not provided and posted in the factory. The management stated that they are not aware of such necessity and the employees reported not being informed of the Code.](#)

**Plan Of Action:**  
**Deadline Date:**  
**Supplier CAP:**  
**Supplier CAP Date:**  
**Action Taken:**  
**Plan Complete:**  
**Plan Complete Date:**  
**Action Verified:**  
**Action Verified Text:**  
**Action Verified Date:**  
**Comments:**

GEN.3 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.

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** [There is no noncompliance reporting mechanism which allows factory workers contact the Company.](#)

**Plan Of Action:**  
**Deadline Date:**  
**Supplier CAP:**  
**Supplier CAP Date:**  
**Action Taken:**

Plan Complete:  
 Plan Complete Date:  
 Action Verified:  
 Action Verified Text:  
 Action Verified Date:  
 Comments:

**Miscellaneous: B. Illegal Subcontracting**

MISC.1 Illegal Subcontracting

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** In-house subcontractor, which is not monitored by the facility, has nearly 20 employees working in the facility. The in-house subcontracting company's employees reported receiving below minimum wage and no overtime payment. There are no personnel files, no social security registrations, no contracts, and no restriction on young employee's working hours and there is no time keeping system. No documentation was provided by the management regarding the in-house subcontractor. Moreover, another subcontractor is used for the client's production. The management stated that there is no documentation available to verify that the client is aware of this usage.

Plan Of Action:  
 Deadline Date:  
 Supplier CAP:  
 Supplier CAP Date:  
 Action Taken:  
 Plan Complete:  
 Plan Complete Date:  
 Action Verified:  
 Action Verified Text:  
 Action Verified Date:  
 Comments:

**Health and Safety: A. General Compliance Health and Safety**

H&S.1 Employers shall comply with all local laws, regulations and procedures concerning health and safety. (S)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc.	1 (out of 5)



[Previously  
CSCC]

**Explanation:** The working permission is not renewed as per the labor law article 95, the working license which need to be obtained from the local government as per the labor law article 78 is missing in the facility. Moreover, waste water discharge permission is dated 2003 per the factory standards on that period; therefore it should be renewed as per the water pollution control regulation article 37 as there is printing section and water based dyeing materials are used for production process.

**Plan Of Action:**  
**Deadline Date:**  
**Supplier CAP:**  
**Supplier CAP Date:**  
**Action Taken:**  
**Plan Complete:**  
**Plan Complete Date:**  
**Action Verified:**  
**Action Verified Text:**  
**Action Verified Date:**  
**Comments:**

## Health and Safety: B. Document Maintenance/Worker Accessibility and Awareness

H&S.2 All documents required to be available to workers and management by applicable laws (such as health and safety policies, MSDS, etc.) shall be made available in the prescribed manner and in the local language or language(s) spoken by the workers if different from the local language. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** Working permission which need to be obtained from the municipality should be renewed as per the labor law article 95, working license which need to be obtained from the local government as per the labor law article 78 is missing and waste water discharge permission should be renewed as per the water pollution control regulation article 37. Moreover, MSDS Sheets are missing in the factory for the chemicals used in printing and stain removal sections; in violation of health and safety regulations related to chemicals articles 6.

**Plan Of Action:**  
**Deadline Date:**  
**Supplier CAP:**  
**Supplier CAP Date:**  
**Action Taken:**  
**Plan Complete:**  
**Plan Complete Date:**

Action Verified:  
 Action Verified Text:  
 Action Verified Date:  
 Comments:

### Health and Safety: C. Written Health and Safety Policy

H&S.3 Employers are required to develop, maintain and regularly review a written health and safety policy. The policy must, at the very least, be aimed at complying with legal minimum safety and health standards, regulations and procedures. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** [Written health and safety policy and health & safety committee is missing in the facility; in violation of health and safety regulations regarding health & safety committee's article 4.](#)

Plan Of Action:  
 Deadline Date:  
 Supplier CAP:  
 Supplier CAP Date:  
 Action Taken:  
 Plan Complete:  
 Plan Complete Date:  
 Action Verified:  
 Action Verified Text:  
 Action Verified Date:  
 Comments:

### Health and Safety: D. Worker Consultation

H&S.4 The health and safety policy shall be developed and implemented in consultation with workers or their representatives. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** [Written health and safety policy and health & safety committee is missing in the facility; in violation of health and safety regulations regarding health & safety committee's article 4.](#)

Plan Of Action:

**Deadline Date:**  
**Supplier CAP:**  
**Supplier CAP Date:**  
**Action Taken:**  
**Plan Complete:**  
**Plan Complete Date:**  
**Action Verified:**  
**Action Verified Text:**  
**Action Verified Date:**  
**Comments:**

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### Health and Safety: E. Health and Safety Management System

H&S.5 The health and safety policy shall contain the framework for a comprehensive health and safety management system within which employers' responsibilities and workers' rights and duties, various responsibilities of designated personnel, procedures that enable workers to raise health and safety concerns and procedures for reporting death, injury, illness and other health and safety issues (for instance, near-miss accidents) are clear and regularly tested and reviewed. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** [Written health and safety policy and health & safety committee is missing in the facility; in violation of health and safety regulations regarding health & safety committee's article 4.](#)

**Plan Of Action:**  
**Deadline Date:**  
**Supplier CAP:**  
**Supplier CAP Date:**  
**Action Taken:**  
**Plan Complete:**  
**Plan Complete Date:**  
**Action Verified:**  
**Action Verified Text:**  
**Action Verified Date:**  
**Comments:**

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### Health and Safety: F. Communication to Workers

H&S.6 The health and safety policy shall be communicated to all workers in the local language or language(s) spoken by workers if different from the local language. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent	STR - Specialized	1 (out of 5)

External  
Monitoring  
  
Technology  
Resources,  
Inc.  
[Previously  
CSCC]

**Explanation:**  
**Plan Of Action:**  
**Deadline Date:**  
**Supplier CAP:**  
**Supplier CAP Date:**  
**Action Taken:**  
**Plan Complete:**  
**Plan Complete Date:**  
**Action Verified:**  
**Action Verified Text:**  
**Action Verified Date:**  
**Comments:**

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### Health and Safety: H. Permits and Certificates

H&S.8 The employer shall at all times be in possession of all legally required and valid permits and certificates related to health and safety issues, such as those related to the purchase and storage of chemicals, fire safety inspections, inspection of machinery, and (chemical) waste disposal. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** [The maintenance checks of the machinery are not documented properly; in violation of health & safety regulations article 244. Waste water discharge permission is dated 2003 per the factory standards on that period; therefore it should be renewed as there is printing section and water based dyeing materials are used for production process as per the water pollution control regulation article 37.](#)

**Plan Of Action:**  
**Deadline Date:**  
**Supplier CAP:**  
**Supplier CAP Date:**  
**Action Taken:**  
**Plan Complete:**  
**Plan Complete Date:**  
**Action Verified:**  
**Action Verified Text:**  
**Action Verified Date:**  
**Comments:**

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## Health and Safety: I. Evacuation Requirements and Procedure

H&S.9 All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, the installation and maintenance of an employee alarm and emergency lighting systems, ensuring aisles/exits are not blocked and that workers are not blocked within their workstations, employee education, evacuation procedures, etc.) shall be complied with. Workers shall be trained in evacuation procedures. Alarm systems shall be regularly tested and evacuation drills shall be undertaken at least annually. (S)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** There is no fire fighting plan posted in the factory. Evacuation route is not marked and evacuation plots are not posted on the work floors; in violation of health & safety regulations article 11. Evacuation drills are not conducted; in violation of health & safety regulations article 131. Nearly 50% of the exits are not marked; they open inwards instead of outwards and secondary exits are missing on the work floors; in violation of health and safety regulations article 113. Emergency lighting, fire alarm and sprinkler system are missing in the factory; in violation of health and safety regulations article 130 and 19.

**Plan Of Action:**

**Deadline Date:**

**Supplier CAP:**

**Supplier CAP Date:**

**Action Taken:**

**Plan Complete:**

**Plan Complete Date:**

**Action Verified:**

**Action Verified Text:**

**Action Verified Date:**

**Comments:**

## Health and Safety: J. Safety Equipment and First Aid Training

H&S.10 All safety and medical equipment (such as fire fighting equipment, first aid kits, etc.) shall be available in sufficient numbers throughout the factory, maintained and stocked as prescribed and easily accessible to workers. A sufficient number of workers shall be trained in first aid and fire fighting techniques. (S)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** Although the total number of the employees exceeds 50, there is no

agreement with a doctor in the facility; in violation of health and safety regulations article 81. First aid kits are missing on the work floor and there is no employee with first aid certification in the facility; in violation of health and safety regulations articles 93 and 107. Fire extinguishers are not marked, nearly 25% of them are not mounted and nearly 80% of them are blocked; in violation of health and safety regulations article 123. Evacuation drills are not conducted; in violation of health & safety regulations article 131.

**Plan Of Action:**

**Deadline Date:**

**Supplier CAP:**

**Supplier CAP Date:**

**Action Taken:**

**Plan Complete:**

**Plan Complete Date:**

**Action Verified:**

**Action Verified Text:**

**Action Verified Date:**

**Comments:**

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## **Health and Safety: K. Personal Protective Equipment**

H&S.11 Workers shall be provided with effective and all necessary personal 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 health and safety hazards, including medical waste. (S)

400076921G – Turkey: Asics

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** Needle guards, 8 lower and 7 upper pulley guards are missing in the sewing machines; in violation of health and safety regulations article 158. Ventilation of the printing section appears to be inadequate and air quality test is not conducted in printing section; in violation of health and safety regulations related to chemical work article 8. Gloves, goggles are missing and paper masks are used in chemical related section; in violation of health and safety regulations articles 524, 530 and 533.

**Plan Of Action:**

**Deadline Date:**

**Supplier CAP:**

**Supplier CAP Date:**

**Action Taken:**

**Plan Complete:**

**Plan Complete Date:**

**Action Verified:**

**Action Verified Text:**

**Action Verified Date:**

**Comments:**

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## Health and Safety: M. Chemical Management and Training

H&S.13 All chemicals and hazardous substances shall be properly labeled and stored in accordance with applicable laws. Labels shall be placed in the local language and the language(s) spoken by workers, if different from the local language. Workers shall receive training, appropriate to their job responsibilities, concerning the hazards, risks and the safe use of chemicals and other hazardous substances. (S)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** Labels are missing in chemical containers; in violation of health & safety regulations related to chemicals article 8. Training related to chemicals is not conducted in printing section; in violation of health & safety regulations related to chemicals article 10.

**Plan Of Action:**

**Deadline Date:**

**Supplier CAP:**

**Supplier CAP Date:**

**Action Taken:**

**Plan Complete:**

Plan Complete Date:  
 Action Verified:  
 Action Verified Text:  
 Action Verified Date:  
 Comments:

### Health and Safety: N. Material Safety Data Sheets/Worker Access and Awareness

H&S.14 Material Safety Data Sheets (MSDS) for all chemicals used in the factory must be available at the usage and storage sites of the chemicals, in the local language and the language(s) spoken by workers, if different from the local language. Workers shall have free access to MSDS. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** [MSDS Sheets are missing for the chemicals used in the factory; this is a violation of health and safety regulations related to chemicals articles 6.](#)

Plan Of Action:  
 Deadline Date:  
 Supplier CAP:  
 Supplier CAP Date:  
 Action Taken:  
 Plan Complete:  
 Plan Complete Date:  
 Action Verified:  
 Action Verified Text:  
 Action Verified Date:  
 Comments:

### Health and Safety: Q. Ventilation/Electrical/Facility Installation and Maintenance

H&S.17 All necessary ventilation, plumbing, electrical, noise and lighting services shall be installed and maintained to conform to applicable laws and in such a manner as to prevent or minimize hazardous conditions to workers in the facility. (S)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** [The electrical control panel's inner covers are missing and the cables are](#)



not properly protected; nearly 20% of the electrical control panels are blocked, they are not marked and their switches are not labeled indicating their functions; moreover rubber mats are also missing below them; in violation of health and safety regulations article 276 and 277. Ventilation of the printing section appears to be inadequate and air quality tests are not conducted in printing section; in violation of health and safety regulations related to chemical work, article 8.

**Plan Of Action:**  
**Deadline Date:**  
**Supplier CAP:**  
**Supplier CAP Date:**  
**Action Taken:**  
**Plan Complete:**  
**Plan Complete Date:**  
**Action Verified:**  
**Action Verified Text:**  
**Action Verified Date:**  
**Comments:**

### Health and Safety: R. Machinery Maintenance and Worker Training

H&S.18 All production machinery, equipment and tools shall be regularly maintained and properly guarded. Workers shall receive training in the proper use and safe operation of machinery, equipment and tools they use. Employers shall ensure safety instructions are either displayed/posted near all machinery or are readily accessible to the workers. (S)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** Needle guards, 8 lower and 7 upper pulley guards are missing in the sewing machines; in violation of health and safety regulations article 158. Workers do not receive any training for the machinery used.

**Plan Of Action:**  
**Deadline Date:**  
**Supplier CAP:**  
**Supplier CAP Date:**  
**Action Taken:**  
**Plan Complete:**  
**Plan Complete Date:**  
**Action Verified:**  
**Action Verified Text:**  
**Action Verified Date:**  
**Comments:**

## Health and Safety: U. Medical Facilities

H&S.21 Medical facilities shall be established and maintained in factories as required by applicable laws. Medical staff shall be fully licensed and recognized under applicable local rules and regulations. An appropriate number of medical staff shall be on duty during all working hours, including any type of overtime, as required under local law. An appropriate stock of medical supplies shall be maintained at all times. Medicines of which the expiration date has passed must be replaced immediately and disposed of in a safe manner. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** Although the total number of the employees exceeds 50, there is no agreement to have a doctor in the facility; in violation of health and safety regulations article 81. First-aid kits are missing on the work floor and there is no employee with first aid certificate in the facility; in violation of health and safety regulations articles 93 and 107.

**Plan Of Action:**

**Deadline Date:**

**Supplier CAP:**

**Supplier CAP Date:**

**Action Taken:**

**Plan Complete:**

**Plan Complete Date:**

**Action Verified:**

**Action Verified Text:**

**Action Verified Date:**

**Comments:**

## Health and Safety: V. Sanitation in Factory Facilities

H&S.22 All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with all applicable laws, including relevant sanitation, medical and safety and health regulations. (S)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** Soap and toilet paper are missing in the toilets; Ventilation appears to be inadequate in the toilets - both in violation of health and safety article 38. Gas detector is missing in kitchen area.

**Plan Of Action:**

**Deadline Date:**

**Supplier CAP:**  
**Supplier CAP Date:**  
**Action Taken:**  
**Plan Complete:**  
**Plan Complete Date:**  
**Action Verified:**  
**Action Verified Text:**  
**Action Verified Date:**  
**Comments:**

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### Health and Safety: Y. Food Preparation

H&S.25 All food made available to workers shall be prepared, stored, and served in a safe and sanitary manner in accordance with all applicable laws. All workers handling food shall be provided with the tools and equipment necessary to do so in a safe and sanitary manner. (S)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** Gas detector is missing in the kitchen area; no health and safety regulations to prevent fire in the facilities.

**Plan Of Action:**  
**Deadline Date:**  
**Supplier CAP:**  
**Supplier CAP Date:**  
**Action Taken:**  
**Plan Complete:**  
**Plan Complete Date:**  
**Action Verified:**  
**Action Verified Text:**  
**Action Verified Date:**  
**Comments:**

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### Health and Safety: ZC. Other - Health and Safety

Other

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** 23 employee's periodical health checks expired on March 7, 2008. Periodical health checks are not conducted; in violation of labor law articles 86 and 87.

**Plan Of Action:**

**Deadline Date:**

**Supplier CAP:**

**Supplier CAP Date:**

**Action Taken:**

**Plan Complete:**

**Plan Complete Date:**

**Action Verified:**

**Action Verified Text:**

**Action Verified Date:**

**Comments:**

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### Hours of Work: A. General Compliance Hours of Work

HOW.1 Employers shall comply with all local laws, regulations and procedures concerning hours of work, public holidays and leave. (S)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:**

**Plan Of Action:**

**Deadline Date:**

**Supplier CAP:**

**Supplier CAP Date:**

**Action Taken:**

**Plan Complete:**

**Plan Complete Date:**

**Action Verified:**

**Action Verified Text:**

**Action Verified Date:**

**Comments:**

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### Hours of Work: D. Protected Workers (Women and Young Workers)

HOW.4 The factory shall comply with all applicable laws governing work hours regulating or limiting the nature, frequency and volume of work performed by women or workers under the age of 18. (S)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent	STR - Specialized	1 (out of 5)

External  
Monitoring  
  
Technology  
Resources,  
Inc.  
[Previously  
CSCC]

**Explanation:** Young employees work the same hours as the regular employees. The management was advised to make sure that young employees work more than 8 hours per day, 40 hours per week as per the labor law article 71 and they do not work at night, as per the labor law article 73.

**Plan Of Action:**  
**Deadline Date:**  
**Supplier CAP:**  
**Supplier CAP Date:**  
**Action Taken:**  
**Plan Complete:**  
**Plan Complete Date:**  
**Action Verified:**  
**Action Verified Text:**  
**Action Verified Date:**  
**Comments:**

### Hours of Work: E. Protected Workers (Women and Young Workers)/Record Keeping

HOW.5 Employers shall maintain necessary records identifying all women workers and all workers under the age of 18 entitled to legal protection concerning work hours. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** 27 of Ekin Tekstil's employees and 20 in-house subcontractor employees personnel files with sufficient age documentation are missing; in violation of labor law article 75.

**Plan Of Action:**  
**Deadline Date:**  
**Supplier CAP:**  
**Supplier CAP Date:**  
**Action Taken:**  
**Plan Complete:**  
**Plan Complete Date:**  
**Action Verified:**  
**Action Verified Text:**  
**Action Verified Date:**  
**Comments:**

## Hours of Work: F. Time Recording System

HOW.6 Time worked by all workers, regardless of compensation system, shall be fully documented by time cards or other accurate and reliable recording systems such as electronic swipe cards. Employers are prohibited from maintaining multiple time-keeping systems and/or false records for any fraudulent reason, such as to falsely demonstrate working hours. Time records maintained shall be authentic and accurate. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** There are two time recording systems in the facility. Attendance sheets are used for governmental assessments and swipe card system is used to record the actual hours worked.

**Plan Of Action:**

**Deadline Date:**

**Supplier CAP:**

**Supplier CAP Date:**

**Action Taken:**

**Plan Complete:**

**Plan Complete Date:**

**Action Verified:**

**Action Verified Text:**

**Action Verified Date:**

**Comments:**

## Hours of Work: H. Overtime/Reduced Mandated Overtime

HOW.8 The employer shall demonstrate a commitment to reduce overtime and to enact a voluntary overtime system, including for overtime mandated to meet extraordinary business circumstances. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** Working hours exceed 11 hours per day when the employees work overtime until 10:00pm; in violation of labor law article 63. The management stated that they work overtime until 10:00pm as a general rule and cannot reduce the work hours as the production capacity would be affected.

**Plan Of Action:**

**Deadline Date:**

**Supplier CAP:**

Supplier CAP Date:  
 Action Taken:  
 Plan Complete:  
 Plan Complete Date:  
 Action Verified:  
 Action Verified Text:  
 Action Verified Date:  
 Comments:

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**Hours of Work: I. Overtime/Positive Incentives**

HOW.9 Employers shall use positive incentive schemes to induce overtime and shall ensure such incentive schemes are known by workers. (P)

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** [There is no positive incentive scheme to induce overtime.](#)  
**Plan Of Action:**  
**Deadline Date:**  
**Supplier CAP:**  
**Supplier CAP Date:**  
**Action Taken:**  
**Plan Complete:**  
**Plan Complete Date:**  
**Action Verified:**  
**Action Verified Text:**  
**Action Verified Date:**  
**Comments:**

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**Hours of Work: W. Other - Hours of Work**

Other

Audit Date	Audit Type	Audit Scope	Auditor	Score
10/15/2008	External	FLA Independent External Monitoring	STR - Specialized Technology Resources, Inc. [Previously CSCC]	1 (out of 5)

**Explanation:** [Nearly 20 employees' time records are not provided, as these employees work at the in-house subcontractor company. There is no time recording system for them. No documentation was provided for employees and it was not possible to clarify which company these employees work at.](#)

**Plan Of Action:**

**Deadline Date:**

**Supplier CAP:**

**Supplier CAP Date:**

**Action Taken:**

**Plan Complete:**

**Plan Complete Date:**

**Action Verified:**

**Action Verified Text:**

**Action Verified Date:**

**Comments:**

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