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.
Company Comment: In 2006 adidas Group helped create and deliver a remediation plan to this factory in order to address the issues found during the original IEM visit. Shortly after the factory audit, this facility was deactivated by adidas due to the high number of violations identified. As a result, the adidas Group’s SEA Team was unable to ensure a successful completion of the remediation plan.

FLA Audit Profile

Country: Turkey
Factory Name: IEM
Date(s) in Facility: 10/11/2006
PC(s): 400, 376, 412
Number of Workers: 400
ESGS: Ongoing

PCs: Asics, adidas Group, Patagonia

Production Processes: PC Internal
Completion Date: If not corroborated, explain why used for corroborating implemented by Factory Management or Company

Notable Features

Documentation

Seamless, intimate apparel, active, swim, maternity and yoga wear

Posters sent from ASICS and Patagonia.

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 visible place and in a language accessible to the employees. This information shall be provided on an ongoing basis and reinforced through other non-verbal communications so that employees’ understanding of the standards improves over time.

FLA Principle of Monitoring, Obligation of Companies:

1. Mandatory Public Commitments and Accountability

2. Independent Monitoring

3. Child Labor

4. Forced Labor

5. Nondiscrimination

6. Health and Safety

7. Child Wellbeing

8. Freedom of Association and Effective Procedures

9. Distribute PPE

10. Food and Drinking Water

11. Life and Work Environment

12. Power, Energy, and Water

13. Prevention of Harassment

14. Worker Rights

15. Management Commitments and Enforcement

16. PC's

17. Work-Related Injuries or Diseases

18. OSHA/ISO

19. Do not sell

20. Scope of Audit

21. Reporting on Remediation

22. Participation of Workers

23. Key Findings

24. Resources

25. Plan of Action
### FLA Code/Compliance Issue

<table>
<thead>
<tr>
<th>Country Law/Legal Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>FLA Benchmark</td>
</tr>
<tr>
<td>Non-compliance</td>
</tr>
<tr>
<td>Evidence of Non-compliance</td>
</tr>
</tbody>
</table>

**Overtime Limitations**

Except in extraordinary business circumstances, employees will:

1. Not be required to work more than the lesser of 48 hours per week and 12 hours per day.
2. Have a day off, not be required to work more than the lesser of 48 hours per week and 12 hours overtime per day.

**Turkish Law**

There is always overtime in the knitting department, as they are working in two shifts with 12-hour periods each. Overtime is over legal limits; worker(s’) O/T is already 2735 hours, which must not exceed 270 hours according to Turkish Labor Law.

**Actions Required**

- **Factory should reduce overtime in the knitting department to come into compliance with Turkish law 4857, or consider hiring additional staff if the overtime is continuous.**
- **Q3 2007** New employees are already hired and shift system has been changed. As of 01.02.07 the non-compliance has been remediated.

**Company Follow-up**

- **Completed** The shift-working departments have been working three shifts in a day since February 2007.