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.
### Government Compliance

**Labor Law Article 77** | **Chemical Management**
---|---
Workers will receive proper payrolls, time cards, real payrolls, interviews and benefit cards. | Workers should receive training, appropriate to their job responsibilities, in the safe use of chemicals and other hazardous substances.

### Policies

#### Health and Safety

**Employers will provide a safe and healthy working environment to prevent accidents and injury to health arising out of work or arising in a place of work.**

<table>
<thead>
<tr>
<th>Date of Observation</th>
<th>Date of Action</th>
<th>Date of Training</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>1-Jun-07</td>
<td>15-Jun-07</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### Additional Policies

**Miscellaneous**

- False Payroll Records: Employers will not use hidden or multiple payroll records in order to hide overtime, to falsely demonstrate hourly wages, or for any other fraudulent reason.
- Chemical Management: Workers will receive training, appropriate to their job responsibilities, in the safe use of chemicals and other hazardous substances.

### Nonconformance

#### Remediation Updates

- Overtime Limitations: Except in extraordinary business circumstances,
  - Overtime Limitations: Employers will not use monetary fines and penalties for poor performance or fine the worker.
  - Monetary Fines and Penalties: Labor Law Article 25

### Documents

- Site tour observation: The training and the verbal warning is provided to the worker who made the mistake.

### Procedure

- Remediation: The overtime limit of 270 hours per year is legal annual limit which is 270 hours and daily working hours is maximum 11 hours/day e.g. by maintenance personnel.
- False Payroll Records: Employers will not use hidden or multiple payroll records in order to hide overtime, to falsely demonstrate hourly wages, or for any other fraudulent reason.
- Chemical Management: Workers should receive training, appropriate to their job responsibilities, in the safe use of chemicals and other hazardous substances.

### Conclusion

The company has conducted a survey to corroborate the findings and the appropriate actions taken by the factory. The survey was conducted to ensure the effectiveness of the remediation measures taken.