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

Employers will maintain sufficient hiring and employment records to demonstrate and verify compliance with the Code provision. Employers will complete all hiring and employment records for all workers, such as a birth certificate, which verifies date of birth. Age proof records were maintained in 03 files out of 25 files reviewed. All appointment letters were held complete and included in the files. The factory *** does not maintain appointment letters. According to Item 1(iv) Schedule 1B of The Industrial Employment Establishments Act, 1946, every individual establishment needs to maintain a service card in respect of each workmen in the establishment. Every individual establishment needs to maintain a service card in respect of each workmen. All appointment letters were maintained in 03 files out of 25 files reviewed.

Age Documentation

Every employee will be treated with respect and dignity. No employee will be subject to any physical, sexual, psychological or verbal harassment or abuse. Every employee will be treated with respect and dignity. All appointment letters were included in the files. According to Section 38 (1 & 2) of The Factories Act, 1948, the employer shall provide and maintain on record at the establishment a register of all employees maintained on file with the date of birth to the employer or the individual establishment. (eg. matriculation certificate, certified copy of date of birth as recorded in the registers of a municipality, local authority or post office certificate or affidavit.) Employees will maintain current age documentation for all workers, such as a birth certificate, which verifies date of birth. Age proof records were maintained in 03 files out of 25 files reviewed. All appointment letters were maintained in 03 files out of 25 files reviewed.

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 or abuse. Every employee will be treated with respect and dignity. Employees will maintain current age documentation for all workers, such as a birth certificate, which verifies date of birth. Age proof records were maintained in 03 files out of 25 files reviewed. Appointment letter was complete in 12 files and not available in 03 files out of 25 reviewed. Interview and document review. Interview and document review.

Evidence of Non-Compliance

There will be no loss of facial labor, whether in the form of piece rate, underpayment, forced labor or otherwise.

Certificate or Affidavit

According to Subsection 10.1 of the Model Standing Orders on Additional terms, under 1.1.1, every individual establishment shall maintain a service card in respect of each workmen. Every individual establishment shall be maintained in the form appended to these orders. All documentation of the ID card shall be maintained in the format to be followed in the factory. All documentation of the ID card shall be maintained in the format to be followed in the

Governmental laws

According to Section 38 (1 & 2) of The Factories Act, 1948, the employer shall provide and maintain on record at the establishment a register of all employees maintained on file with the date of birth to the employer or the individual establishment. (eg. matriculation certificate, certified copy of date of birth as recorded in the registers of a municipality, local authority or post office certificate or affidavit.) Employees will maintain current age documentation for all workers, such as a birth certificate, which verifies date of birth. Age proof records were maintained in 03 files out of 25 files reviewed. All appointment letters were maintained in 03 files out of 25 files reviewed. According to Item 1(iv) Schedule 1B of The Industrial Employment Establishments Act, 1946, every individual establishment needs to maintain a service card in respect of each workmen. Employees will maintain current age documentation for all workers, such as a birth certificate, which verifies date of birth. Age proof records were maintained in 03 files out of 25 files reviewed. According to Item 1(iv) Schedule 1B of The Industrial Employment Establishments Act, 1946, every individual establishment needs to maintain a service card in respect of each workmen. Employees will maintain current age documentation for all workers, such as a birth certificate, which verifies date of birth. Age proof records were maintained in 03 files out of 25 files reviewed. All appointment letters were maintained in 03 files out of 25 files reviewed. Employees will maintain current age documentation for all workers, such as a birth certificate, which verifies date of birth. Age proof records were maintained in 03 files out of 25 files reviewed. All appointment letters were maintained in 03 files out of 25 files reviewed.

Target Completion

All appointment letters were completed and included in the files. All appointment letters were completed and included in the files. All appointment letters were completed and included in the files. According to Item 1(iv) Schedule 1B of The Industrial Employment Establishments Act, 1946, every individual establishment needs to maintain a service card in respect of each workmen. All appointment letters were maintained in 03 files out of 25 files reviewed. All appointment letters were maintained in 03 files out of 25 files reviewed. All appointment letters were maintained in 03 files out of 25 files reviewed. All appointment letters were maintained in 03 files out of 25 files reviewed. All appointment letters were maintained in 03 files out of 25 files reviewed.

Certification

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| FLA Benchmark | FLA Compliance | FLA Noncompliance | FLA Noncompliance Reason | FLA Noncompliance Resolution | FLA Noncompliance Processed Date | FLA Noncompliance Evidence | FLA Noncompliance Management | FLA Benchmark | FLA Compliance | FLA Noncompliance | FLA Noncompliance Reason | FLA Noncompliance Resolution | FLA Noncompliance Processed Date | FLA Noncompliance Evidence | FLA Noncompliance Management | FLA Benchmark | FLA Compliance | FLA Noncompliance | FLA Noncompliance Reason | FLA Noncompliance Resolution | FLA Noncompliance Processed Date | FLA Noncompliance Evidence | FLA Noncompliance Management |
|---------------|----------------|------------------|--------------------------|------------------------------|-------------------------------|-----------------------------|-----------------------------|----------------|----------------|----------------|--------------------------|-------------------------------|-------------------------------|-----------------------------|-----------------------------|----------------|----------------|----------------|--------------------------|-------------------------------|-------------------------------|-----------------------------|
| Fire Safety   |               |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
|               |               |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
| Health and Safety |         |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
|               |               |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
| Legal Compliance |        |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
|               |               |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
| Noticeable/Noticable MV | |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
|               |               |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
| 1. Fire Safety Procedures |        |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
|               |               |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
| Fire Safety Procedures |        |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
|               |               |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
| 2. Evacuation Procedure |        |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
|               |               |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
| Evacuation Procedure |        |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
|               |               |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
| 3. Safety Equipment |        |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
|               |               |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
| Safety Equipment |        |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
|               |               |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
| 4. Maintenance |        |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
|               |               |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
| Maintenance |        |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
|               |               |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
| 5. FLA Code/Compliance |        |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
|               |               |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
| FLA Code/Compliance |        |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
|               |               |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
| 6. Safety Equipment |        |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
|               |               |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
| Safety Equipment |        |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
|               |               |                  |                          |                              |                              |                             |                            |               |               |               |                          |                               |                               |                             |                            |               |               |               |                          |                               |                               |                             |                            |
Accurate recording of wage compensation

According to Section 21 of the Payment of Wages Act, 1936, every employer shall be liable for compensating the wages of every person employed by him of all wages required to be paid.

Wages for work performed would be calculated and recorded accurately. Records of wages paid to each worker were maintained in the factory. Wages were paid in full to workers on a monthly basis. All wages were paid on the 28th day of each month, which is the last date for full payment in accordance with the Payment of Wages Act, 1936. The wages paid were rounded off to the nearest multiple of 50 rupees.

Record Maintenance

Records required for wage computation, such as timesheets, wage registers, and other documentation, were maintained accurately and updated regularly. All wages paid to workers were recorded in the wage book, which was kept for at least one year. The factory had a policy of keeping wage records for a period of five years from the date of payment. There were no instances of late or incorrect wages being paid.

Source/Documentation used

All records were available for review. The auditor has reviewed the records and confirmed that all wages had been paid accurately and on time. There were no instances of discrepancies or errors in the wage records.
### Hours of Work

**Except in extraordinary business circumstances**, employees will (i) 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 the country of manufacture do not give any limit on regular or overtime work, the regular work week in such country plus 12 hours overtime; and (ii) be entitled to at least one day off in every seven day period. An extraordinary business circumstance is a temporary period of extra work that could not have been anticipated or alleviated by other reasonable efforts.

#### Time-recording system

- 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.
- During audit it was noted that 95 workers were not having attendance card.
- During document review of production records on floor workers were found to perform work on weekly off days that were not made available to the auditors.
- Review of production and in and out time records
- Review of production and in and out time records
- Review of production and in and out time records
- Review of production and in and out time records

#### Evidence of non-compliance

- None
- None
- None
- None

#### Remediation plan

- All overtime records will be maintained on the said day.
- Auditors have found that all attendance cards are now available for review and records are being accurately maintained.

### Overtime Limitations

Except in extraordinary business circumstances, employees will (i) 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 the country of manufacture do not give any limit on regular or overtime work, the regular work week in such country plus 12 hours overtime; and (ii) be entitled to at least one day off in every seven day period.

#### Time-recording system

- 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.
- During audit it was noted that 95 workers were not having attendance card.
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- Review of production and in and out time records

#### Evidence of non-compliance

- None
- None
- None
- None

#### Remediation plan

- All overtime records will be maintained on the said day.
- Auditors have found that all attendance cards are now available for review and records are being accurately maintained.

### FLA Benchmark

#### FLA Code/ Compliance issue

- None
- None
- None
- None

#### FLA Benchmark

### Country Law/Legal Reference

- None
- None
- None
- None

### IEM Findings

#### FLA Benchmark

- None
- None
- None
- None

#### FLA Benchmark

### Non-compliance

- None
- None
- None
- None

#### FLA Benchmark

### Target completion

- Oct-05
- Oct-05
- Oct-05
- Oct-05

#### FLA Benchmark

### Company

- Oct-05
- Oct-05
- Oct-05
- Oct-05
<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>Overtime Compensation</td>
<td>According to Section 13(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.</td>
<td>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.</td>
<td>Review of production and in and out time records.</td>
<td>None</td>
<td>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</td>
<td>December 1, 2005</td>
<td>Some workers had misplaced their attendance cards but replacement cards have been made available to those workers</td>
<td>July 28, 2006</td>
<td>Auditor has found that all attendance cards are not available for review and records are being accurately maintained. Workers are being paid correctly for all hours worked.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Explanation**

10. Overtime Compensation

According to Section 13(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 are to 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.