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.
<table>
<thead>
<tr>
<th>FLA Code/Compliance Issue</th>
<th>Country Law/age Reference</th>
<th>FLA Benchmark</th>
<th>FLA Audit Profile</th>
<th>Remediation</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. Code Awareness</td>
<td></td>
<td></td>
<td>FLA Principle of Monitoring, Obligation of Code: 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.</td>
<td>Management interview and visual inspection</td>
<td>Completed</td>
</tr>
<tr>
<td>3. Child Labor</td>
<td></td>
<td></td>
<td>FLA Principle of Monitoring, Obligation of Companies: Develop a secure communications channel, in a manner appropriate to the culture and situation, to enable Company employees and employees of contractors and suppliers to report to the Company on noncompliance with the workplace standards, with security that they shall not be punished or prejudiced for doing so.</td>
<td>Management interview and visual inspection</td>
<td>Completed</td>
</tr>
<tr>
<td>4. Harassment or Abuse</td>
<td></td>
<td></td>
<td>FLA Principle of Monitoring, Obligation of Companies: Every employee will be treated with respect and dignity. No employee will be subject to any physical, sexual, psychological or verbal harassment of abuse.</td>
<td>Management interview and visual inspection</td>
<td>Completed</td>
</tr>
<tr>
<td>5. Nondiscrimination</td>
<td></td>
<td></td>
<td>FLA Principle of Monitoring, Obligation of Companies: No person will be subject to any discrimination in employment, including hiring, salary, benefits, advancement, discipline, termination or reinstatement, on the basis of gender, race, religion, age, disability, sexual orientation, national origin, political opinion, or social or ethnic origin.</td>
<td>Management interview and visual inspection</td>
<td>Completed</td>
</tr>
<tr>
<td>6. Health and Safety</td>
<td></td>
<td></td>
<td>FLA Principle of Monitoring, Obligation of Companies: Employers will provide a safe and healthy working environment to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of employer facilities.</td>
<td>Management interview and visual inspection</td>
<td>Completed</td>
</tr>
</tbody>
</table>

**Remediation:**

- **IEM Findings:**
  - **FLA Code Awareness:** Drew Pearson did not provide COC to factory for posting or communicate code obligations to management or workers.
  - **Confidential Non-compliance Reporting Channel:** No confidential noncompliance reporting mechanism has been put in place by Drew Pearson.

- **Management Interview and Visual Inspection:**
  - 4/1/2006 Acknowledge receipt and all post info.
  - E-mail to factory on file.

- **Documentation Completed:**
  - Completed

- **Company Follow up:**
  - Not applicable

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**FLA Audit Profile**

Country: China  
Factory Name: 25001529D  
EM: ALGI  
Date(s) in Facility: 9 & 10 November, 2005  
PC(s): Drew Pearson Inc.

**Number of Workers:** 710

**Production Process:** Headwear

**Product(s):** Cutting, Sewing, Ironing, Knitting, Embroidery, Keyhole, QC and Packing.
II. Wages and Benefits

Employers recognize that wages are essential to meeting employees' basic needs. Employers will pay employees, as a base, at least the minimum wage required by local law or the prevailing industry wage, whichever is higher, and will provide legally mandated benefits.

III. 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 such country will not limit the hours of 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.

IV. Overtime Compensation

In addition to their compensation for regular hours of work, employees will be compensated for overtime hours at such premium rate as is legally required in the country of manufacture or, in those countries where such laws will not exist, at a rate at least equal to their regular hourly compensation rate.

Miscellaneous

Contract review and Management interview