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 14 in.) paper. To print the charts, please make sure to select “legal” size paper from Print properties.
Factory Profile
Country: Thailand
Factory: 05027449A
IEH: IEM MTL (Thailand) Co. Ltd.
Date of monitoring visit: 11-Mar-02
Duration of IEM evaluation: 3 Days
PC(s): Levi Strauss & Co., Liz Claiborne, Inc.
Number of Workers: 3050
Product: woven shirts

Findings

<table>
<thead>
<tr>
<th>FLA Code</th>
<th>FLA Code Benchmark/Legal Reference</th>
<th>Monitor Findings</th>
<th>Best Practice</th>
<th>Date</th>
<th>PC Required Action and Comments</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Code Awareness</td>
<td>Lack of Code Awareness</td>
<td>FLA PRINCIPLES OF MONITORING - Voluntary Compliance: B.0.2: Information Workplace. Ensure that all Company factories as well as contractors and suppliers inform their employees about the workplace standards onsite 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>Neither monitoring nor number of workers at FLA Workplace Code of Conduct. Management did not have a FLA Code of Conduct or Levi Code of Conduct posted.</td>
<td>30-Sep-02</td>
<td>The LS&amp;Co. Code of Conduct Poster is currently being translated to the local language, will be printed and distributed in local and English languages to contractors. The Liz Claiborne Code of Conduct is already posted in the factory.</td>
<td>The factory has the ability to develop a written workplace code of conduct, which will be translated into local language and consistently communicated to employees. This will be in place by week of December 2nd. The poster was printed and posted. Photographs were provided to LS&amp;Co. as verification.</td>
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<td>2. Forced Labor</td>
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<td>3. Child Labor</td>
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<td>4. Harassment or Abuse</td>
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<td>5. Non-Discrimination</td>
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<tr>
<td>6. Health and Safety</td>
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<td>7. Emergency Evacuation</td>
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<tr>
<td>8. Health and Safety</td>
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<tr>
<td>9. Fire Extinguisher</td>
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<tr>
<td>Toilet Sanitation</td>
<td>FLA Code Benchmark V. Health and Safety: B.11. All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with applicable laws.</td>
<td>The toilet at the entrance of dining area are not kept clean, neat and ventilated.</td>
<td></td>
<td>20-Nov-02</td>
<td>2. All the toilets that workers used (inside the facility) are clean and maintained well. Please see attached photo. The toilet located by the MSU is not outside the toilet category. This toilet is located inside the MSU, at the entrance of the MSU. Please keep the area around the toilet clean (including not smoking, cleaning, etc. during no work). Please see attached photo. Note that ventilation is non-issue. The factory will improve this particular toilet by: a. replace the fluorescent bulb b. paint and clean the toilet c. put a reminder sign inside the toilet (in keeping it clean)</td>
<td>The toilet has been repainted and condition improved. Toilet has been painted, lights replaced and cleaned.</td>
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<tr>
<td>Chemical Storage</td>
<td>FLA Code Benchmark V. Health and Safety: B. 6. All chemicals and hazardous substances should be properly labeled and stored in accordance with applicable laws. Workers should receive training, appropriate to their job responsibilities, in the safe use of chemicals and other hazardous substances.</td>
<td>A test run is a washing machine that the chemicals were not kept in the store nor chemical keeping area.</td>
<td></td>
<td>20-Nov-02</td>
<td>3. There are storage facilities in which chemicals are used. Chemicals are commonly used in the production and another storage for the specialized chemicals (acrylonitrile). MSDS is available and posted for these chemicals. Please see attached photo on storage. For the chemical storage, the factory should: a. ensure all chemical containers are in storage on site b. make a check list of chemicals for easy detection c. put in place secondary containment on these storage places.</td>
<td>Chemical storage has been improved. All the chemical storage is done and chemicals were put on pallets and inside (in keeping it clean).</td>
</tr>
<tr>
<td>FPE</td>
<td>FLA Code Benchmark V. Health and Safety: B.5. Workers shall wear appropriate 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 hazardous elements including medical waste.</td>
<td>There are some workers who did not wear a dust mask in their work while working in the sewing section.</td>
<td></td>
<td>20-Nov-02</td>
<td>4. There are 2 storage chemical storage places. 1 in the work area (softeners, other chemicals) commonly used in the production and another storage for the specialized chemicals (acrylonitrile). There is no secondary containment on these storage places.</td>
<td>No further action needed.</td>
</tr>
<tr>
<td>Dining Facility</td>
<td>FLA Code Benchmark V. Health and Safety: B.11. All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with applicable laws.</td>
<td>The dining facility is insufficient, compared with the total number of worker (3,050).</td>
<td></td>
<td>21-Aug-02</td>
<td>7. Factory plans to do a scheduling on lunch breaks (shifting) to accommodate all workers.</td>
<td>There are 3 ways as to how workers consume their lunch breaks. In the current set up, workers are split into groups and eat at different times in the factory. It has been observed that even if there are still vacant seats at the canteen, some workers opted to sit on open spaces and eat with their friends. This issue has been raised to the Joint Consultant Committee (composed of 36 workers representative) for their inputs. The committee have pointed that workers under the current setup (if having same time breaks) as given them the opportunity to socialize with their friends. The committee has agreed to look into the possibility of having different time breaks (depending on different departments in the factory). If the breaks will be scheduled, then they will not enjoy this opportunity</td>
</tr>
<tr>
<td>Access to Drinking Water/Ventilation</td>
<td>FLA Code Benchmark V. Health and Safety: B.8. All ventilation, plumbing, electrical and lighting services shall be provided and maintained to conform to applicable laws and prevent hazardous conditions to employees in the facility. 1. All food preparation shall be prepared, stored, and served in a sanitary manner in accordance with applicable laws. Safe drinking water should be available in each building.</td>
<td>There is no drinking water available in dining facility. And there is no appropriated ventilation in this area.</td>
<td></td>
<td>5-Aug-02</td>
<td>8. There is no drinking water available in dining facility. And there is no appropriatet ventilation in this area.</td>
<td>No further action needed. The factory and canteen has agreed to provide for a water dispenser that will be placed inside the canteen. 3 water dispenser have been bought to be placed inside the factory. This old dispenser inside the factory will be pulled out, repaired and will be placed in the canteen.</td>
</tr>
</tbody>
</table>
Findings | FLA Code | FLA Code Benchmark/Legal Reference | Monitor Findings | Best Practice | Date | PC Required | Action and Comments
--- | --- | --- | --- | --- | --- | --- | ---
**Freedom of Association and Collective Bargaining**

Suggestion boxes were provided, but none had not been seen or followed-up documentation available or evident.

- FLA Code 3.2.2.4

- Aside from the suggestion box, the factory has a Welfare Committee composed of elected workers' representative and management that meets once a month to discuss workers welfare and concerns. To provide the necessary transparency to the process, the factory will:
  1. Provide a summary of all the actions taken as a result of the Welfare Committee's meeting.
  2. Post it on notice board.
  3. Include comments that workers put in the suggestion box and corresponding factory comments on these suggestions.

**Wages & Benefits**

- Factory has worker's data which is complied with labor law. Factory also provide an accident insurance for all workers.

**Hours of Work**

- FLA Code Benchmark VII. Hours of Work:
  - Except in extraordinary business circumstances, employees will (c) not be required to work more than the lesser of (a) 48 hours per week and 12 hours overtime per month; or (b) the limits on regular and overtime hours followed by the law of the country of manufacture or, when the laws of each country will limit the hours of work, the regular work week in each country plus 12 hours overtime and (c) 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.

- FLA Code Benchmark VII. Hours of Work:
  - Overtime working on Sunday was found (7 days straight work per week 40 hours)
  - Factory understands the issue on excessive OT and Sunday work and have made impressive efforts to alleviate the issue.

**Overtime Compensation**

- FLA Code Benchmark VII. Hours of Work:
  - Overtime hours were recorded in 12 hour increments which satisfies FLA qualification (minimum 12 hours overtime, 60 hours per week).

**Excessive OT**

- FLA Code Benchmark VII. Hours of Work:
  - The percentage are analyzed and reasons are stated as to why OT exceeds 60 hours per week. Records review. The management system that has been setup is very impressive.

- A meeting has been agreed to happen by next year so that factory can share what they have learned on this initiative.

**Meeting minutes have been maintained (continuous records for each session per 1 month) are committed and clear in meeting their obligations and that these suggestions are discussed.**