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.
### FLA Code Compliance Issues

<table>
<thead>
<tr>
<th>Country</th>
<th>Law/Reference</th>
<th>FLA Benchmark</th>
<th>Member’s Findings</th>
<th>Noncompliance, Indicator or Risk</th>
<th>Documentation</th>
<th>Best Practice</th>
<th>PC Remediation plan</th>
<th>Target Completion Date</th>
<th>Factory Responsible (Optional)</th>
<th>Company follow up (Code of conduct)</th>
<th>Date of planned or follow up visit, if appropriate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Korea</td>
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</tbody>
</table>

#### Code Awareness
- Workers that expressed awareness of Code
  - Identify workers who are not aware of the Code.
  - Management interviews to ensure that workers are aware of the Code.
  - This procedure is not in place.
  - PC will request that the management holds a meeting with workers to ensure that all workers are aware of the Code.
  - Management interviews to ensure that workers are aware of the Code.
  - Pictures of the meeting, attendance sheet / acknowledgement sheet signed by workers.
  - The Code is also posted in the local language along with Liz contact information to ensure that workers are aware of the Code.

#### Confidentiality non-compliance reporting channel
- FLA Principle of Monitoring, Obligation of Companies: Ensure that all Company employees and contractors report non-compliance with the workplace standards to the Company. This procedure is not in place.
  - PC will request that the company provide their employees with a clear and accessible way to report non-compliance.
  - Management interviews to ensure that workers are aware of the procedure.
  - Pictures of the meeting, attendance sheet / acknowledgement sheet signed by workers.
  - The Code is also posted in the local language along with Liz contact information to ensure that workers are aware of the Code.

#### Forced Labor
- No person will be employed at an age younger than 15 (or 14 where the law of the country of manufacture allows) or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15.
- Management interviews to ensure that workers are aware of the procedure.
- Pictures of the meeting, attendance sheet / acknowledgement sheet signed by workers.
- The Code is also posted in the local language along with Liz contact information to ensure that workers are aware of the Code.

#### Child Labor
- No person will be employed at an age younger than 15 (or 14 where the law of the country of manufacture allows) or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15.
- Management interviews to ensure that workers are aware of the procedure.
- Pictures of the meeting, attendance sheet / acknowledgement sheet signed by workers.
- The Code is also posted in the local language along with Liz contact information to ensure that workers are aware of the Code.

#### Discrimination
- No person will be subject to any discrimination in employment, including hiring, salary, benefits, advancement, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, national or social or ethnic origin.
- Management interviews to ensure that workers are aware of the procedure.
- Pictures of the meeting, attendance sheet / acknowledgement sheet signed by workers.
- The Code is also posted in the local language along with Liz contact information to ensure that workers are aware of the Code.

#### Health and Safety
- Employees 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.
- Management interviews to ensure that workers are aware of the procedure.
- Pictures of the meeting, attendance sheet / acknowledgement sheet signed by workers.
- The Code is also posted in the local language along with Liz contact information to ensure that workers are aware of the Code.
<table>
<thead>
<tr>
<th>FLA Code/Compliance issue</th>
<th>Country Law/Reference</th>
<th>FLA Benchmark</th>
<th>Mentor's Findings: Noncompliance, Indicator, or Risk</th>
<th>Documentation</th>
<th>Best Practice</th>
<th>PG Remediation plan</th>
<th>Target Completion Date</th>
<th>Factory Response (Optional)</th>
<th>Company follow up (Date of follow up visit)</th>
<th>Company follow up (Date of planned or follow up visit, if appropriate)</th>
<th>Updates</th>
<th>Company Verification Follow-up</th>
</tr>
</thead>
<tbody>
<tr>
<td>Evacuation Procedure</td>
<td>Industrial safety and health act: Article 31 (1) The business owner shall periodically conduct education on safety and health for the workers in his place of business as prescribed by the Ordinance of the Ministry of Labor (only applied to management)</td>
<td>FLA Benchmark</td>
<td>Evacuation routes need to be more clearly established.</td>
<td>Visual inspection</td>
<td>Evacuation routes are clearly illustrated on the factory walls and arrows on the floors are also clear</td>
<td>May 04</td>
<td>Factory already illustrated evacuation routes on the wall and arrows on the floors on Sep 02 after audit.</td>
<td>PC confirmed that evacuation routes were properly posted and door markings were clear on 8/31/04</td>
<td>Photos of evacuation routes</td>
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<tr>
<td>Safety Equipment</td>
<td>All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, unobstructed aisles/exits, employee education, evacuation procedures, etc.) shall be complied with and workers shall be trained in proper safety, first aid, and evacuation procedures</td>
<td>Documentation Best Practice PC Remediation plan Target Completion Date Factory Response (Optional) Company follow up (Date of follow up visit) Documentation</td>
<td>Is there anything that can be done here?</td>
<td>Visual inspection</td>
<td>One sewing machine obstructed. Alarm has been removed after GSC audit.</td>
<td>10/31/04</td>
<td>PC confirmed the removal of obstacle in front of the alarm on 9/3/04</td>
<td>Photos of improved placement of the alarm</td>
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<tr>
<td>Ventilation/Electrical/facility maintenance</td>
<td>Industrial safety and health act: Article 24 (1) 6. Health problems caused by failure to maintain the proper standards of ventilation, lighting, illumination, thermal insulation, damp-proofing, cleaning, etc.</td>
<td></td>
<td>Two switch boxes need covers. The cutting room needs an adequate ventilation system.</td>
<td>Visual inspection</td>
<td>Two switch boxes which not in use was taken off, the other one now covered.</td>
<td></td>
<td>Confirmed 2 switch boxes now covered. The factory commits to performing the special procedure which makes this room hot. They committed to providing adequate ventilation if they again perform this procedure but there are currently no plans to do so.</td>
<td>Photos of improved switch cover.</td>
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<td>Freedom of Association and Collective Bargaining</td>
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<tr>
<td>Wages and Benefits</td>
<td>Voluntary Use of Benefits</td>
<td>Worker interview and management interview</td>
<td>Factory provide meals to workers</td>
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<td>Payroll Reporting</td>
<td>Accurate and reliable payroll reporting, including pay stubs will be provided</td>
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<tr>
<td>Legal Benefits</td>
<td>Employment Insurance Act</td>
<td>Employee interview and management interview</td>
<td>Factory provides social insurance benefits to most of its workers (80-90%)</td>
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<td>Hours of Work</td>
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</table>
### 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.

**Misclassifications**
- Unauthorized subcontracting
- Possible homework

<table>
<thead>
<tr>
<th>FLA Code Compliance Issue</th>
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<th>Factory Response (Optional)</th>
<th>Company follow-up (cite date of follow up)</th>
<th>Company Follow-up (cite date of planned or follow up visit, if appropriate)</th>
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<tr>
<td>Overtime Compensation</td>
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