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.
H&M and OXFORD were out of this factory since Feb 2007. (completed)

1/3/07
2/15/2006: Got the COC of H&Ms
Completed 1) Generally H&M does not require our Code of Conduct to be posted in the factory. In the case a factory produces for different buyers it might contradict with the Code. This factory produces for H&M only. So no contradiction.
2) COC training had been included into the new hire orientation training every month.

Facility does not have internal policy regarding

4/30/2008: factory made lots of improvements for the FLA. We focus on the following features:
Lack of protection of underage workers
Employers will ensure that, all workers engaged in operating or working close to hazardous equipment, working at dangerous heights or lifting heavy loads, or exposed to hazardous substances, are above the legal age for such work.

Document review and worker interviews
1) Get the COC from other brand and post in the main factory area
2) Train the workers and supervisors on COC for each month
3) We report our updates to the FLA on a weekly basis

Only Nike's CoC was observed posted at the facility. H&M's CoC was not posted. As per management and observation, none of the FLA affiliated companies have informed them about the Company's commitment to the code of conduct and its membership with the FLA.

FLA Principle of Monitoring, Obligation of Companies: Establish and articulate clear, written policies and procedures about the code of conduct, to Company factories as well as to licensees, contractors and suppliers.

Company Note:
Company follows up (Cite date of follow up) PC Internal Audit Profile

1/3/07: Factory will set up the completed grievance system and to handle the problem. Every month, we visit the factory and communicate these to all workers. As per observation, young workers hired in the past were restricted from dangerous or hazardous positions and excessive overtime.

2. 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.

3. 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.

4. Health and Safety
Every employee will be treated with respect and dignity. No employee will be subject to any physical, sexual, psychological or verbal harassment or abuse. 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, nationality, political opinion, or any other characteristic protected by law.

6. Human Rights
No human rights violation will be tolerated. All production machinery and equipment shall be maintained, properly guarded, and operated in a safe manner. All personal protective equipment required by law shall be provided. Workers shall be provided with breaks at regular intervals. Any work that is hazardous or dangerous shall be performed only by workers who are properly trained and skilled. All hazardous materials shall be properly handled and disposed of in accordance with all applicable laws and regulations. Workers shall be permitted to meet, organize, and engage in activities protected by law. Workers shall be permitted to seek the protection of law for the redress of grievances. No worker shall be subject to any form of retaliation for exercising any right protected by law.
### FLA Code of Conduct Compliance: April 2008 Review

**A. Freedom of Association and Collective Bargaining**

Employers will recognize and respect the right of employees to freedom of association and collective bargaining.

**B. 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 to all eligible workers.

**C. Hours of Work**

Employees will (i) work no more than 48 regular working hours per week and (ii) be entitled to at least one day off in every seven-day period.

**D. 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 do not exist, at a rate at least equal to their regular hourly compensation rate.

**E. Remediation Updates**

### FLA Comment

The Chinese constitution guarantees Freedom of Association; however, the Trade Union Act stipulates that union committees have to be democratically elected at members' assemblies and trade unions must be independent of the government. The Amended Trade Union Act of October 2001 does not stipulate that union committees have to be democratically elected at members' assemblies and trade unions must be independent of the government. The Chinese constitution guarantees Freedom of Association; however, the Trade Union Act stipulates that union committees have to be democratically elected at members' assemblies and trade unions must be independent of the government. The Amended Trade Union Act of October 2001 does not stipulate that union committees have to be democratically elected at members' assemblies and trade unions must be independent of the government. The Chinese constitution guarantees Freedom of Association; however, the Trade Union Act stipulates that union committees have to be democratically elected at members' assemblies and trade unions must be independent of the government. The Amended Trade Union Act of October 2001 does not stipulate that union committees have to be democratically elected at members' assemblies and trade unions must be independent of the government.

### Table of FLA Compliance

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<thead>
<tr>
<th>FLA Code/Compliance</th>
<th>FLA Comment</th>
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<tr>
<td>FLA Code/Compliance</td>
<td>FLA Comment</td>
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### Action Plan

- Factory is to apply for the registered trade union in the factory. Factory had the new year team meeting recently in order to enhance the communication with the employees.
- Factory is to communicate the FLA code of conduct to the employees.
- Factory is to provide the FLA code of conduct in the factory.
- Factory is to communicate the FLA code of conduct in the factory.
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