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.
June 2007 Establish a grievance system and installation of suggestion box, take necessary practices according to the definitions of this system to make sure the grievance system is implemented and work well.

Factory will sign contracts with all those workers that have not granted a contract as soon as possible, In the future, for all newly employed workers, the factory will sign a contract with each of them within one month.

Factory does not have written policy regarding child labor.

Around 10% of personnel records sampled did not contain copy of worker’s ID. The factory failed to keep employment records, disciplinary reports and management interview. Employment records Art. 16 of PRC Labor Law (Chapter 3 Labor Contracts and Collective Contracts): A labor contract is an agreement between a worker and a company that establishes a labor relationship and defines the rights and obligations for each party. To have labor relationship shall sign a labor contract.

Establish and articulate clear, written workplace standards. Formally convey those standards to Company factories and licensees, contractors and suppliers. The factory shall sign labor contract with a worker, which must be in Chinese language and in a readable way. The factory should sign a labor contract with each of newly employed workers. The young workers must have valid medical examination and management interview.

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 education. Employees have received guidance about the CoC where the hotline number for workers to communicate with PC was provided. They agreed to follow-up according to the factory remediation plan at next audit.

We will provide trainings about CoC and management interview 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 non-compliance with the workplace standards, with security that they shall not be punished or prejudiced for doing so.

All employees have received internal regulations in line with our Code of Conduct and local legislation and to clearly communicate these to all workers, for example through a handbook for the workers or on the notice board.


tables and figures below
<table>
<thead>
<tr>
<th>FLA</th>
<th>Remediation</th>
<th>Follow up Date</th>
<th>FLA</th>
<th>Remediation</th>
<th>Follow up Date</th>
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</thead>
<tbody>
<tr>
<td>5. Nondiscrimination</td>
<td><strong>Factory Response (Optional)</strong></td>
<td>Company Follow up Documentation</td>
<td><strong>Factory Response (Optional)</strong></td>
<td>Company Follow up Documentation</td>
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<tr>
<td><strong>FLA Code/ Compliance issue</strong></td>
<td><strong>Country Law/Legal Reference</strong></td>
<td><strong>FLA Benchmark</strong></td>
<td><strong>Non-compliance Risk of Non-compliance</strong></td>
<td><strong>Evidence of Non-compliance</strong></td>
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<tr>
<td>Before</td>
<td>Establish and articulate a policy against harassment and abuse in workplace according to ILO standards and Chinese Law/Legal Reference, which also includes provisions for hiring and promotion in place in the factory along with associated training and education. We will follow up on the factory remediation of non-compliance.</td>
<td>FLA Comment:</td>
<td>FLA Comment:</td>
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<tr>
<td>Before</td>
<td>The factory will give more education regarding fire safety to raise fire prevention awareness of the workers. Try the best to keep the evacuations passages and exits are free all the time.</td>
<td>Art. 14.3 of PRC Fire Prevention Law: Enterprises shall carry evacuation procedure</td>
<td>Art. 14.3 of PRC Fire Prevention Law: Enterprises shall carry evacuation procedure</td>
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<tr>
<td>Before</td>
<td>Factory tour and management interview</td>
<td>Art. 409 of Factory Fire Control Rules: The factory must conduct fire drills at least twice a year.</td>
<td>Art. 409 of Factory Fire Control Rules: The factory must conduct fire drills at least twice a year.</td>
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<td>Before</td>
<td>Factory will check and maintain first aid kits.</td>
<td>Art. 29. Factory Safety Regulations: Working area should set hand wash equipment according to needs and provide soap.</td>
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<tr>
<td><strong>Other</strong></td>
<td><strong>Art. 407 of Design Regulations for Fire Extinguisher Installation</strong></td>
<td><strong>All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, unblocked aisles/exits, employee education, evacuation procedures, etc.) shall be complied with and workers shall be trained in proper safety, first aid, and evacuation procedures.</strong></td>
<td><strong>All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, unblocked aisles/exits, employee education, evacuation procedures, etc.) shall be complied with and workers shall be trained in proper safety, first aid, and evacuation procedures.</strong></td>
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<tr>
<td><strong>Sanitation in Dormitories</strong></td>
<td><strong>Art. 34 of Factory Safety Law:</strong> Employee dormitory shall keep a safe distance from the product workshop and other premises. The dormitory shall set sanitation in dormitories and sanitation provisions such as fire extinguishers, first aid kits, hand washing equipment and evacuation planning shall be conducted at least annually.</td>
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<tr>
<td><strong>Machinery Maintenance</strong></td>
<td><strong>Art. 29 of Safe Production Law:</strong> The designing, making, and maintaining of machinery and equipment shall be conducted at least annually and shall be well maintained, properly guarded, and operated in a safe manner.</td>
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**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.

**Minimum Wage**

According to the PRC Labor Law, the minimum wage shall be determined by local governments. The minimum wage should at least meet the basic living needs of wage earners. Employers are required to pay employees the legal minimum wage.

**Payment of Legal Benefits**

Legally mandated benefits will be provided or paid in full and within legally defined time periods. Employers are required to provide all legally mandated benefits to all workers.

**Accurate Recording of Wages**

Documentation review is needed to ensure that all workers are allowed at least one day off per week. Employers are required to provide accurate documentation on salaries and working hours. From the payroll it should be possible to determine the wage, the hourly rate, and the overtime rate.
<table>
<thead>
<tr>
<th>议题/问题标题</th>
<th>摘要</th>
<th>详细内容</th>
<th>来源和认证</th>
<th>整改措施和跟踪管理</th>
<th>时间线/截止日期</th>
<th>最终结果</th>
<th>备注/后续行动</th>
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<td>员工访谈和记录审查</td>
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<td>管理层访谈</td>
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<td>其他/休假日</td>
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**Note:**
- **FLA Code/ Compliance issue**: FLA Code/ Compliance issue
- **Country Law/Legal Reference**: Country Law/Legal Reference
- **FLA Benchmark**: FLA Benchmark
- **Non-compliance**: Non-compliance
- **Evidence of Non-compliance**: Evidence of Non-compliance
- **Corroborated**: Corroborated
- **Sources/Documentation used for corroborating**: Sources/Documentation used for corroborating
- **Notable Features implemented by Factory Management or Company**: Notable Features implemented by Factory Management or Company
- **PC Internal audit findings (Optional)**: PC Internal audit findings (Optional)
- **PC Remediation plan Target Completion Date**: PC Remediation plan Target Completion Date
- **Factory Response (Optional)**: Factory Response (Optional)
- **Company follow up (Cite date of follow up)**: Company follow up (Cite date of follow up)

**Record Maintenance**
All legally required payroll documents, journals and reports will be available complete, accurate and up-to-date. In the United States terms this would include W-4s, I-9s, green cards, 941s and supporting material.

**Factory did not provide any time records to the audit team. It is impossible to verify working hours issues in the factory.**

**The responsible person was not in the factory during the auditing days. Time records were not available to the audit team.**

**Documentation review and management interview**
We require the factory to record all working hours in the factory, allowing the worker themselves to punch their own time card according to their actual working hours.

**On-going**
We will try our best to reduce overtime working, plan production carefully, make our working days at least one day off in every seven days, reasonable work.

**Accurate Recording of OT Hours Worked**
Employees will 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.

**No time record was provided to the audit team to review. It was impossible to verify whether overtime hours were accurately recorded.**

**The responsible person was not in the factory during the auditing days. Time records were not available to the audit team.**

**Documentation review and management interview**
We require the factory to allow the workers to punch their own attendance cards by themselves according to their actual working hours.

**On-going**
We will discuss with the factory how they can improve their payroll.

**OT Compensation**
Art. 44.1 of PRC Labor Law: The employer shall pay workers no less than 150% of their regular wages if they are required to work overtime.

Art. 44.2 of PRC Labor Law: Payment of wages for overtime work performed shall be in addition to the regular wages the employee is entitled to receive. Payment to workers should be no less than 300% of the normal wage if they are required to work during a legal holiday.

**The factory shall comply with applicable law for premium rates for overtime compensation.**

**Only one payroll was provided to the audit team and it only contains the net payment of each employee. OT compensation could not be verified.**

**The responsible person was not in the factory during the auditing days. Further information could not be provided by the factory.**

**Documentation review and management interview**
We require the factory to ensure that at 12 months of payrolls and attendance documents are available for review of the auditing team at any time.

**Miscellaneous**
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 may not exist, at a rate of at least equal to their regular hourly compensation rate.

**10. Overtime Compensation**

Art. 13 of Interim Regulation on the Payment of Wages: Piece workers who are required to work overtime after they finished production quotas must be paid no less than 150% (regular work days), 200% (days of rest), or 300% (on statutory holidays) of the normal piece-rate during regular working hours.

**Where workers are paid on a piece rate, the payment for overtime work performed shall result in no less payment than the premium pay required by law.**

**No time record was provided to the audit team to review. It was impossible to verify whether the premium pay required by law.**

**The responsible person was not in the factory during the auditing days. Time records were not available to the audit team.**

**Documentation review and management interview**
We require the factory to ensure all working hours issues in the factory, allowing the worker themselves to punch their own time card according to their actual working hours.

**On-going**
We will try our best to reduce overtime working, plan production carefully, make our working days at least one day off in every seven days, reasonable work.

**Miscellaneous**

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