

FLA Code/ Compliance Issue	Country/Legal Reference	FLA Benchmark	Non-compliance	Risk of Non-compliance	ISM Findings				Remediation				Status				Updates (Chs Date of Follow up)				Status				Third Party Verification/ Level Work			
					Evidence of Non-compliance (uncomorbated)	If not comorbated, explain why	Sources/Documentation	Notable Features Implemented by Factory Management or	PC Internal Audit Findings (Optional)	PC Remediation plan (February 1, 2006)	Target Completion Date	Factory Response (Optional)	Company follow up (March 24, 2006)	Documentation	Completed/ Pending/ Ongoing	Updates (Chs Date of Follow up)	Documentation (Dec 2006)	Completed/ Pending/ Ongoing	Updates (Chs Date of Follow up)	Documentation (March 2007)	Completed/ Pending/ Ongoing	Updates (Chs Date of Follow up)	Documentation (June 07 follow up)	Completed/ Pending/ Ongoing	External Verification (May 25, 2008)	Documentation	Company Follow up (July 25th, 2008)	Documentation
Legal benefits	As per Article 15 of regulation issued on Official Newspaper dated 14.07.04 referring to Turkish Labor Law 4857, Article 68, the facility with 100-150 female workers shall have separate feeding rooms separate from production site and minimum 250m away. The facility with 150 or more female workers shall have nursery maximum 200m away. If the nursery is further than 200 m, then the factory shall provide free transportation to/nom/nursery. If the Employer can't provide a breastfeeding room and/or a nursery, they shall have a contract with an external organization.	As per Article 15 of regulation issued on Official Newspaper dated 14.07.04 referring to Turkish Labor Law 4857, Article 68, the facility with 100-150 female workers shall have separate feeding rooms separate from production site and minimum 250m away. The facility with 150 or more female workers shall have nursery maximum 200m away. If the nursery is further than 200 m, then the factory shall provide free transportation to/nom/nursery. If the Employer can't provide a breastfeeding room and/or a nursery, they shall have a contract with an external organization.	Some female workers need crèche for their children. Crèche is in the process of being established as explained by management.																									
9. 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.																												
Overtime Limitations	According to Turkish Labor Law 4857, Article 11, consecutive rest shall provide between 2 shifts for workers. As per Turkish Labor Law 4798, Article 46, at least 24 hours consecutive rest shall be provided in every seven day period. According to Turkish Labor Law 4857, Article 68, factory shall provide at least 90 mins break in the daily working hours over 7.5 hour. According to Turkish Labor Law 4857, Article 63, daily combined working hours (regular + overtime) shall not exceed 11 hours.	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. An extraordinary business circumstance is a temporary period of extra work that could not have been anticipated or alleviated by other reasonable efforts.	Workers are not provided 11 hours consecutive rest when any working in shift mode. Workers worked without one day off in seven. Combined regular and overtime hours exceeds 57 hours (45 hours national working hours per week and plus 12 hours FLA COCA per week). Workers having 30 minute break in 9 hours period per day instead of 60 minute break. The workers who are working for extra work that could not have been anticipated or alleviated by other reasonable efforts.																									
Legal compliance with protected workers	As per Article 10 of regulation issued on Official Newspaper dated 14.07.04 referring to Turkish Labor Law 4857, Article 68, pregnant, new-born or breastfeeding mothers shall not work in excess of 7.5 hours per day.	The factory will comply with all applicable laws governing working hours, including those regulating limiting the nature and volume of work performed by women or workers under the age of 18.	Pregnant workers are working regular 9 hours per day.																									
Other			There were inconsistencies between overtime records and payments with voluntary overtime records.																									
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10. 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.																												
Other			There were inconsistencies between overtime records and payments with voluntary overtime records.																									
Miscellaneous																												