

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 Audit Profile	
Country	VIET NAM
Factory name	12008462B
IEM	BVCPS Indonesia
Date of audit	9 & 10 Sep 2003
PC(s)	Reebok
Number of workers	490
Product(s)	Printing product (logo, label)
Production processes	customer's sample reception , film making , protocol printing , customer approval , printing ink preparation , processing.

FLA Code/ Compliance issue	Findings				Remediation					Update		
	Benchmark or legal reference	Monitor's Findings	Documentation	Best Practice	PC remediation plan	Target Completion Date	Documentation Requested	Factory Response	Completion Date	PC Follow-Up & Verification (March 2004)	Company Follow up (August 2004)	Documentation
1. Code Awareness												
2. Child Labor												
3. Forced Labor												
4. Harassment or Abuse												
5. Nondiscrimination												
Pregnancy testing	Employers will not use pregnancy testing or the use of contraception as a condition of hiring or of continued employment. Employers will not require pregnancy testing of female employees, except as required by law.	The female applicants are tested for pregnancy as part of the employment application process.	By management interviewing.		Upon clarification of factory practices, it was determined that the factory does not test for pregnancy, or use information regarding pregnancy status as a condition for hiring in the application process. However, if the factory has reasonable cause to believe that a woman is pregnant, the factory will ask about pregnancy status in order to determine whether reasonable accommodation needs to be made to place women in less hazardous positions in the event of pregnancy.		Please submit to Reebok the following documents: (1) a copy of the factory's non-discrimination policy, (2) copies of the factory's documented policies and procedures for the recruitment and hiring of workers, (3) Non-Discrimination 2004 employee communication and training plan, (4) pictures of any places where the factory's non-discrimination policies are posted inside the factory. Please mark the pictures as to where they are located inside the factory.	Corrective actions taken. Factory has developed protections against discrimination of pregnant women in factory's discrimination and recruitment policies.	20-Feb-04	Reebok's monitor reaudited the factory, and determined the following: (1) Copies of the factory's non-discrimination policy and recruitment policies are in Vietnamese. (2) No written training plan submitted, but trainings are conducted every 6 months as of Jan. '04. (3) Worker interviews indicates that non-discrimination policy and recruitment policy are communicated. The following remediation documentation is on file at Reebok's office: : Bulletin Board Notice.jpg, Non-discrimination Policy.jpg, Training Picture.jpg Reebok's monitor will continue to monitor the factory, to determine ongoing compliance, as well as the effectiveness of the factory's training efforts.	Reebok's monitor conducted a follow up visit on July 20, 2004, and has determined that as of this date the factory continues to have protections against discrimination of pregnant women in its discrimination and recruitment policies. No new instances of non-compliance were found.	Copies of the factory's non-discrimination policies are maintained in Reebok's internal files.
					However, in order to prevent in a sustainable manner any possible discrimination against women in the future, the factory should implement the following: (1) Include in a factory non-discrimination policy the factory's policies on the non-discrimination of women, as well as procedures for its implementation. The policy must define the specific behaviors that are forbidden, and should also define procedures for how to complain about discriminatory practices, as well as for investigating and responding to all complaints. (2) Develop and document objective criteria and application processes for the recruitment and hiring of workers (3) Undertake efforts to regularly communicate company policies surrounding non-discrimination to new and current employees, both in orally and in writing. Please develop a plan for how this employee communication and training will be conducted for 2004.	Jan-04						
6. Health and Safety												
Chemical management	Workers should receive training, appropriate to their job responsibilities, in the safe use of chemicals and other hazardous substances.	Some workers were not aware of the hazards of chemical use.	Worker interviews		Reebok requires its suppliers to conduct effective health and safety training, which includes chemical safety, and to communicate information to workers on a regular basis. Reebok's experience is that workers use of personal protective equipment (PPE) increases when workers truly understand the hazards of the chemicals used. Factory management or an outside safety professional must conduct safety training for all workers using chemicals, which should, at a minimum, include the following: (a) how to read and understand Material Safety Data Sheets (MSDS) (b) how to reduce risks associated with chemical use, including how to properly use PPE Please note that oral training, videos, announcements and written materials should be supplemented by posters and other graphic aids prominently displayed in the factory so that workers with limited literacy understand factory safeguards.	Jan-04	Once training has been conducted, please submit to Reebok the following documents: (1) copies of all training materials (2) information on the person(s) and/or organization(s) who conducted the training with information on their expertise and (3) documentation that demonstrates training has been provided, including a list of participants.	Every year, our technical staff provide workers with trainings on chemical handling and factory policies. New workers are also instructed in chemical handling related to their job before beginning work. However, workers may forget what they have been taught, therefore beginning in January 2004 trainings will be conducted every 6 months.	20-Feb-04	Reebok's monitor reaudited the factory, and verified that MSDS are in place. The following remediation documentation is on file at Reebok's office: Chemical handling guide.bmp, MSDS 1.jpg, MSDS 2.jpg, Cyclohexane MSDS.bmp, MMKetone MSDS.bmp, Training MSDS2.jpg Reebok's monitor will continue to monitor the factory, to determine ongoing compliance, as well as the effectiveness of the factory's training efforts.	Reebok's monitor conducted a follow up visit on July 20, 2004, and found that the factory continues to maintain a system of MSDS, which includes ongoing training on chemical safety.	Copies of MSDS, training documentation and worker's guide in proper chemical handling are maintained in Reebok's internal files.
PPE	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 chemicals including medical waste.	There is no sign or diagram indicating the need for protective equipment such as gloves. Masks and gloves are not provided to workers handling chemicals such as Anol, printing ink, adhesive additives.	Visual Inspection		(1) Factory information demonstrates that the factory has previously provided PPE, but workers are not using them. Factory management or an outside safety professional must conduct an investigation as to why workers are not using PPE, and then develop and implement a program to address the root cause. Common causes usually found for non-use of PPE is improper equipment or lack of knowledge and training on the risks associated with non-PPE-use. (2) Factory management or an outside safety professional must develop a factory policy on PPE and procedures for its implementation. Once developed, the factory's policy on PPE should be posted in the local language of the workers in a prominent location wherever potentially hazardous chemicals are in use inside the factory.	Jan-04	Please submit to Reebok the following documents: (1) a document outlining the results of the PPE investigation, (2) a copy of the plan for addressing the reasons for non-PPE-use and documents demonstrating that the plan was implemented, (3) pictures showing that workers are using the proper PPE in all activities where PPE is required, (4) a copy of the factory's PPE policy and (5) pictures of the PPE policy's posting(s) inside the factory.	We provided PPE for all activities, except screen printing as we were under the impression that it was not needed since workers were using mostly water-based ink. Now we provide workers with rubber gloves. All of Reebok's requests concerning PPE equipment use and training have now been met.	20-Feb	Reebok's monitor audited the facility, and verified the corrective actions taken by the factory. The following remediation documentation is on file at Reebok's office: Chemical handling guide.bmp, Glove at working place.jpg Using gloves 1.jpg Warning.jpg PPE Policy.jpg Reebok's local monitor will continue to monitor the factory, to determine ongoing compliance.	Reebok's monitor conducted a follow up visit on July 20, 2004, and found that the factory continues to enforce its PPE policy.	Pictures of PPE in use, as well as a copy of the factory's PPE policy, are maintained in Reebok's internal files.

FLA Code/ Compliance issue	Benchmark or legal reference	Findings			PC remediation plan	Target Completion Date	Remediation			Completion Date	PC Follow-Up & Verification (March 2004)	Update	
		Monitor's Findings	Documentation	Best Practice			Documentation Requested	Factory Response	Company Follow up (August 2004)			Documentation	
Document Maintenance/ Accessibility	All documents required to be available to workers and management by applicable laws (such as policies, MSDS etc) shall be made available in the prescribed manner and in the local language or language spoken by the majority of the workers if different from the local language	The factory did not have procedures for safe use of chemicals (MSDS), machinery, equipment, and first aid in Vietnamese posted in working places.	Visual Inspection		Factory must post all required policies and procedures surrounding chemical safety, operational safety, and emergency medical care in the local language of the workers in prominent locations inside the factory.	Jan-04	Please submit to Reebok the following documents: (1) copies of all policies and procedures surrounding chemical safety, operational safety, and emergency medical care, and (2) pictures of each of their postings inside the facility, clearly marked as to where they are posted.	Due to the layout of the printing factory, with long tables and machines, it is not convenient for workers to read the policies inside the production floor. Therefore, all policies and procedures are posted in the break area, just in front of the main gate to the production floor.	20-Feb	Reebok's monitor audited the facility, and verified the corrective actions taken by the factory. The following remediation documentation is on file at Reebok's office: Bulletin Board.jpg Safety policy.jpg	Reebok's monitor conducted a follow up visit on July 20, 2004, and found that the factory continues to post its safety policies.	A copy of the safety policy, and pictures of its posting, are maintained in Reebok's internal files.	
Record maintenance	All safety and accident reports shall be maintained for at least one year, or longer, if required by law	The factory does not establish the file for keep records for all accidents, medical emergencies, chemical events and general issues.	Document review		(1) Factory must develop, document, and implement policy and procedures for accidents to address the investigation, recording, and follow-up to accidents for needed modifications to factory rules and practice to prevent recurrence of the incident in future. (2) The factory must develop, implement and maintain an Injury Log to record serious accidents and the actions taken. A sample log is provided in Reebok's Guide for your use.	Jan-04	Please submit to Reebok the following documents once developed: (1) copies of accident policies and procedures, (2) sample injury log	Since the establishment of our facility last March, the guard team has kept an accident record, but our workers have not had any injury in our factory, except headaches or colds. The guards did not record those events. Now that we have hired a nurse, she will keep the injury log and record all happenings.	20-Feb	Reebok's local monitor has confirmed that the factory does have in place a system for recording and tracking injuries. The following remediation documentation is on file at Reebok's office: On File: Sample injury log.jpg Injury policy.jpg	Reebok's monitor conducted a follow up visit on July 20, 2004, and found that the factory continues to maintain a system of tracking injuries.	A copy of the emergency policy, and a sample injury log, are maintained in Reebok's internal files.	
First Aid Training	Workers shall be trained in proper first aid.	There is no trained first aider available in the factory.	Visual inspection and document review		Each work area should have supervisors and workers who are professionally trained in first aid and bloodborne pathogens, including staff on the night shift. It is recommended that at least 1% of the persons present during any shift are certified in first aid. Factory must develop and implement a training program for supervisors and workers on first aid.	Jan-04	Please submit to Reebok a copy of your training materials, as well as objective proof that the training has been conducted.	The trainings will be provided by the local medical service before April. We are waiting for the provider's confirmed schedule. We will submit the certificates.	30-Mar	Reebok will continue to work with the factory on this issue.	Factory sent 21 workers to attend first-aid training course by Vietnam Red Cross. Submitted the list of 21 first-aiders and certificates certified on March 8, 2004. Follow up visit on July 20, 2004.	Certificates are maintained in Reebok's internal files.	
7. Freedom of Association and Collective Bargaining													
Collective Bargaining Agreement	Employers will recognize and respect the right of employees to freedom of association and collective bargaining	There is no Collective Bargaining Agreement	By management interviewing.		The factory has a union which is required by Vietnamese law, but a collective bargaining agreement is not required by Vietnamese law, nor by the FLA or Reebok's Code of Conduct. However, parties are required to honor the right of workers to bargain collectively, and if a CBA is in place, to honor in good faith for the term of the agreement the provisions of any signed agreement. Unless additional findings are found that the factory does not respect the right of workers to freedom of association, no action is currently required by the factory at this time.								
9. Hours of Work													
Overtime limitations	Except in extraordinary 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.	In March 2003, some workers did not receive 1 day off in seven day period	Verified the Time Record Sheets from Jan to Aug 2003.		(1) Workers must have one day off of rest within every seven-day period. Factory must develop a rest day policy and procedures for its implementation. (2) Factory must then undertake efforts to regularly communicate, both orally and in writing, with new and existing workers on the factory's working hours and rest day policies.	Jan-04	Please submit to Reebok the following documents: (1) a copy of the factory's working hours and rest day policy, (2)- 2004 employee communication and training plan on the rest day policy, (3) pictures of any places where the factory's working hour and rest day policies are posted inside the factory. Please indicate on the pictures where in the factory the poster is located.	Factory has developed policies on working hours and rest day, and has provided those policies to workers through postings, and trainings.	2/20/04	Reebok's monitor audited the facility, and verified the corrective actions taken by the factory. The following remediation documentation is on file at Reebok's office: Bulletin Board.jpg Factory's Rule - Bulleting board.jpg Training 2.jpg	Follow up visit on July 20, 2004.		
		In Jan 2003, checked 25 cases, it was found that many worker worked more than 60 hours in one week.	Verified the Time Record Sheets from Jan to Aug 2003.		Reebok's requirement on working hours in apparel factories is that they must not exceed 60 hours per week. Given the nature of working hours in Vietnam, Reebok is allowing an implementation period for factory's to meet this standard, under which Reebok accepts limited exceptions to 60 hours for "3 out of 12 weeks, up to a maximum of 72 hours per week". The factory must commit to Reebok, in writing, to abiding by this Reebok working hours policy. Also, factory must develop and submit to Reebok a plan for how it will organize production to meet working hour limits.	Jan-04	Please submit to Reebok the following documents: (1) written commitment letter, and (2) plan for working hour limits	The factory submitted the commitment letter agreeing to the compliance with Reebok's working hour policy. The factory does not yet have a plan to control overtime hours so as to comply with the local legal overtime limit of 300 hrs/year.	2/20/04	Reebok will continue to work with the factory to control overtime hours so as to comply with the local legal overtime limits over time. The commitment letter (Commitment.jpg) is on file at Reebok's office.	Since the overtime is high in peak season, and less or no OT hrs during low season, it's not easy to develop a detail plan to control overtime hours so as to comply with the local legal overtime limit of 300 hrs/year. In fact, the factory production plan very much depends on customers, and Reebok is not the factory major customer.	None	