

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 Monitoring Visit Profile	
Country	TURKEY
Factory name	120076133B
IEM	SGS TURKEY
Date of audit	30 SEPT.&01 OCT.2003
Days in the facility	2 DAYS
PC(s)	REEBOK
Number of workers	331
Product(s)	Denim outerwear for men, women and kids
Production processes	Fabric cutting, sewing, ironing and finishing

FLA Code/ Compliance issue	Benchmark or legal reference	Monitor's Findings	Findings			Remediation						
			Documentation	Best Practice	PC Internal Findings	PC remediation plan	Target Completion Date	Documentation Requested	Factory Response	Completion Date	Remediation Documentation Submitted	PC Follow-Up & Verification
1. Code Awareness												
Code posting/information	FLA Principles of Monitoring, Obligations of Companies: Establish and articulate clear, written workplace standards. Formally convey those standards to Company factories as well as to licensees, contractors and suppliers.		Inspection all notice boards throughout the factory.	Reebok's COC and the factory's social accountability policy is posted on the all notice boards. Reebok poster posted with the direct mail address and the phone/fax numbers of the monitor in the canteen. Mobile phone number and phone/fax number of the monitor posted in each floor.								
Worker/management awareness of Code	FLA Principles of Monitoring, Obligations of Companies: Ensure that all Company factories as well as contractors and suppliers inform their employees about the workplace standards orally and through the posting of standards in a prominent place (in the local languages spoken by employees and managers) and undertake other efforts to educate employees about the standards on a regular basis.	Although the workplace standards have been posted on the notice boards, it is necessary to organize scheduled trainings for the awareness of the workers and managers, especially to new employed staff. Personnel turn over in the factory is high (83% in year three).	Inspection all notice boards throughout the factory and individual/group interviews.		New Law Nr. 4857 is posted. The new written company policy was given on 8/15/03 to all workers. Still no code of conduct training.	An essential part of achieving factory compliance is creating an informed workplace, whereby employees are familiar with the practices and procedures of a factory, their rights and obligations. Factory must undertake efforts to create an informed workplace, which should, at a minimum, include the following: (1) All factory managers and supervisors must receive regular training in the Reebok Human Rights Production Standards (RHRPS). (2) Workers must know their rights. New employees should receive an orientation at the time of hiring on RHRPS and how to contact Reebok directly. Orientation should also include explanations on the factory rules, policies, worker obligations, worker rights, as well as benefits and other entitlements. (3) Scheduled trainings for existing workers on RHRPS.	Feb-04	Please submit to Reebok the following documents: (1) Objective proof that factory managers and supervisors have been trained on Reebok's Standards; and (2) Copies of the materials to be provided to employees on Reebok Standards during employee orientations, once materials are completed, (3) Objective proof that existing workers were trained on RHRPS.	Factory has not taken action on training, but plans to do so in February.			Reebok's local monitor re-audited the factory on 12/12/2003; and found that no RHRPS training has been conducted. Training will be given by 2/10/04 and documentation will be submitted to Reebok.
2. Forced Labor												
There will not be any use of forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise.												
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.												
Legal compliance for juvenile workers	Turkish Labor Law /clause 73: The young workers under 18 years old shall not work at night shift in the industry. Night begins at 20.00. Employers will comply with applicable laws that apply to young workers, i.e., those between the minimum working age and the age of 18, including regulations relating to hiring, working conditions, types of work, hours of work, proof of age documentation, and overtime.	**** who is 17 years old has over time work over legal limit and after 20:00 in November 2002 (81.7 hours) and in December 2002 (69.9 hours) It's written in the factory's social accountability policy that the young workers shall not work more than 8 hours in a day and 40 hours in a week. This is not taken into consideration with any mechanism.	Inspection of the working hours in the personnel department		Audit on 8/8/03: There are 14 young workers between 15-18 years old. They work 45 hours per week and stay overtime. Due to new local law valid since 6/10/03, young workers are not allowed to work more than 8 hours per day and 40 hours per week. It is required that the management will pay the difference of 5 hours per week to the workers on 9/5/03, train the workers about the new law and will not let them work more than 8 hours per day from 8/9/03 on. Audit on 10/24/03; 9 young workers still working 45 hours and not paid of 5 hours overtime per week.	(1) Management needs to pay all workers the overtime difference valid from 6/10/03. These young workers will work no more than 40 hours per week immediately. Leave records of the 5 workers will be submitted. Payrolls and time keeping records of 9 young workers will be submitted to Reebok. (2) Factory must comply with legal restrictions that apply to young workers, including regulations related to hiring, working conditions, types of work, hours of work, proof of age documentation, and overtime. Factory must document the factory policies, and their procedures for its implementation, for protection of young workers. (3) Training will be given to young workers on the factory's policies and documented.	Nov-03	Please submit to Reebok the following documents: (1) time records, leave records and payroll records of all young workers since 6/10/03, (2) copies of the factory's documented policies on young workers; (3) objective proof that young workers have been trained on the factory's policies	No action taken.			Reebok's local monitor re-audited the factory on 12/12/03 and young workers still working overtime, and no overtime difference paid. Overtime will stop and the difference valid from 6/10/03 will be paid on 3/5/04. Training will be given to young workers and documented by Mild-March. The payment, time keeping and training records, and the leave records of 5 workers will be submitted to Reebok on 3/15/04.
4. Harassment or Abuse												
Every employee will be treated with respect and dignity. No employee will be subject to any physical, sexual, psychological or verbal harassment or abuse.												

FLA Code/ Compliance Issue	Benchmark or legal reference	Monitor's Findings	Findings			Remediation							
			Documentation	Best Practice	PC Internal Findings	PC remediation plan	Target Completion Date	Documentation Requested	Factory Response	Completion Date	Remediation Documentation Submitted	PC Follow-Up & Verification	
5. Nondiscrimination													
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 social or ethnic origin.													
Hiring Discrimination Practices	Employment decisions will be made solely on the basis of education, training, demonstrated skills or abilities. All employment decisions will be subject to this provision. They include: hiring, job assignment, wages, bonuses, allowances, and other forms of compensation, promotion, discipline, assignment of work, termination of employment, provision of retirement	Some of the new employed workers were getting more salary than the former workers who perform the same job. And six monthly salary increase rate was not equal amongst workers performing the same job in the sewing and cutting processes although there was not an improved performance evaluation system.	During the individual and focus group interviews and payroll inspection.		Audit on 10/24/03; workers complain that during salary increase, the supervisors and the management discriminated against workers. No individual performance is recorded. Line performance is recorded daily. Workers from same line received different % of salary increase. Sewing department received the increase in August 2003, but other departments (Cutting) in October 2003.	(1) Management must create an individual performance assessment system for the next salary increase. This system should define the levels or grades of workers and worker skills and their corresponding applicable wage rates. The system should also establish and document objective criteria for the promotion of workers. Procedures for their implementation should be well defined and documented. (2) Workers must receive information in writing on the policy, and factory should also conduct training to all workers and the supervisors. (3) Factory should then determine whether employees are properly categorized in the correct grade. If there is a misclassification, factory must determine an appropriate payment to workers.	Nov-03	Please submit to Reebok the following documents: (1) the individual performance assessment documentation (2) training documentation to Reebok (3) payroll evidence of salary increase	No action taken.				Reebok's local monitor re-audited the factory on 12/12/03, and found that the factory still had no performance system. The management informed us that they will develop a system to assess the individual performance before the next salary increase on 3/31/2004, and will make the salary increase in all the departments at the same time. Individual performance assessment documentation will be submitted to Reebok.
6. Health and Safety													
Employers 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													
Fire Safety Health and Safety legal compliance	Turkish Labor Law/ clause 88 refers to Company doctors' responsibility, authority and working conditions- regulation /Clause 9: Requires a full time nurse for the company between 50-200 staff. One more nurse or nursery staff when the population is over 200. Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits	Only one nurse [at factory. More nurses are needed] according to population (331) of the factory as required by the National Laws.	Inspection of the infirmary and medical staff.		Two full time nurses needed for more than 200 workers due to local law. Only one full time nurse is hired after the deadline given by Reebok on 8/1/2002. One more nurse still needed. The management agreed to provide the second nurse by 9/15/2003.	Factory must comply with all applicable laws and regulations requiring the employment or availability of trained medical personnel during working hours. Management must hire a second full time nurse and submit the labor contract to Reebok.	Jun-04	Please submit a copy of the labor contract to Reebok for verification.				Audits on 10/24/03 and 12/12/03 showed that the factory still had not secured a second nurse.	
Evacuation Procedure	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	There is no established health and safety committee with worker representation. Frequency and the efficiency of the organized Health and safety trainings were not satisfactory (i.e. The last first aid training was realized at 10/11/2001 including all staff. But no serious first aid training since then except July 2003 which was provided by the nurse for 10 workers). Personnel turnover is high in the factory and necessary health and safety trainings were not provided/repeated timely for the workers including the new employed workers.	By the evaluation of the training records and interviews.		Audit on 8/8/03; no Health and Work Safety Committee, which is required also by local law. First aid training is not provided for all the workers and is not a part of orientation. / Fire drill conducted on 7/15/2003. Electric was on during the drill. Documentation needs to include signature and the type of the drill (announced / unannounced). / Audit on 10/24/03; no Health and Work Safety Committee, no first aid training. The last fire drill is conducted on 7/15/03. The factory will attend a responsible manager for accountability till 3/31/04. / The nurse will complete the first aid training and submit documentation to Reebok; orientation of new workers will be sustainable. Audit on 12/12/03; no Health and Work Safety Committee, no first aid training. Will be completed on 12/31/03.	Reebok does not require a worker Health and Safety Committee. However, Reebok holds factory management responsible for full implementation and enforcement of all safety procedures and recommends that management involve workers in all aspects of the process. Moreover, workers should receive health and safety training, at the time of employee orientation and regularly thereafter. Training should include the following, appropriate to a worker's job responsibilities: (a) safe use of chemicals or other hazardous materials, (b) fire safety training, including evacuation drill training, extinguisher training, (c) safety practices and operational safety procedures, (d) PPE use, (e) emergency procedures. The factory must have a detailed health and safety policy, procedures and documentation. The policy will be communicated in writing and documented training to all workers and managers will be provided.	31-Oct-03	Please provide a plan to Reebok on how it plans to meet Reebok's Safety Standards. Objective proof that the factory meets these requirements, once implemented, must also be submitted.	No action taken.		Management created a Health and Safety Committee on 1/23/04, who will be trained on emergency procedures by 3/1/04. Documentation will be submitted to Reebok on 3/2/04. Moreover, the factory has a planned fire drill of 2/10/2004. Documentation will be submitted.		
Safety Equipment	All safety and medical equipment (such as fire fighting equipment, first aid kits, etc.) shall be in place, maintained as prescribed and accessible to the employees.	Periodic maintenance of the fire hoses at the 1 st and 2 nd floors was not carried out since August 2002. Noise level measurement was not done in the production processes.	Inspection of the records and sight tour.		Audit on 10/24/2003; the fire hoses are inspected on 10/10/2003. Document is submitted to Reebok. No noise level measurement.	(1) Noise level measurement will be conducted. (2) Factory should establish a policy, and procedures for its implementation, for the ongoing inspection, maintenance and reporting of fire safety equipment (hoses and extinguishers in the factory). Factory should assign a qualified individual to manage this process.	Dec-04	Please submit to Reebok the following documents: (1) documentation from the noise level measurement, and (2) a copy of the factory's policies and procedures for the inspection and maintenance of fire safety equipment.	Management informs Reebok's monitor that it has conducted noise level measurement on 1/23/04, which is 75 decibel. Documentation will be submitted to Reebok by 2/13/04.			Reebok's monitor is waiting for documentation of the noise measurement, as well as copies of the factory's new fire safety policies. She will also confirm the actions taken by the factory on her next audit of the facility.	

FLA Code/ Compliance Issue	Findings					Remediation						
	Benchmark or legal reference	Monitor's Findings	Documentation	Best Practice	PC Internal Findings	PC remediation plan	Target Completion Date	Documentation Requested	Factory Response	Completion Date	Remediation Documentation Submitted	PC Follow-Up & Verification
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 elements including medical waste.	There was no plastic eye protector on the overlook and punteriz type of the sewing machines. Used PPE in the stain removing unit were not kept properly. All were dusty.	Sight tour.		Audit on 10/24/03; still no needle eye guards and no cupboard for PPE at stain spray area. Audit on 12/12/03; still no needle eye guards and no cupboard for PPE at stain spray area.	(1) Sewing machines should have needle and pulley guards. Please investigate sewing machines, and install safety equipment on any machines that are missing. (2) Factory should establish a policy, and procedures for its implementation, for the ongoing inspection, maintenance of safety devices on sewing machines. Factory should assign a qualified individual for these.	Dec-03	Please submit the following documents: (1) list of all sewing machines which were found to need safety devices, and documentation demonstrating that safety devices were installed. (2) copy of the factory's policies and procedures for the inspection and maintenance of safety devices.	On January 31, 2004, the factory informs Reebok local monitor that the safety guards have been provided.			Reebok's monitor is waiting for documentation on items 1 + 2, and will also confirm the actions taken by the factory on her next audit of the facility.
Ventilation/Electrical/facility maintenance	All ventilation, plumbing, electrical, and lighting services shall be provided and maintained to conform to applicable laws and prevent hazardous conditions to employees in the facility	Ventilation conditions in the ironing and sewing processes were not satisfactory especially for the summer.	During the individual and focus group interviews.		Audits on 10/24/03 and 12/12/03; cooling is not improved.	Cooling will be improved in ironing and sewing departments. Reebok requires all work areas to have ventilation and temperature adequate for the health of the workers and the safe performance of their tasks. The factory should hire a qualified individual to determine whether additional ventilation (windows, air conditioning, fans for air circulation, exhaust, etc.) are needed, and develop a plan for the factory to add it, if needed.	4/1/04	Please submit a report from the individual hired to determine ventilation needs and the factory's response.	No action taken.			
Record Maintenance	All safety and accident reports shall be maintained for at least one year, or longer if required by law			All personal health check files were renewed. Accident reports and taken corrective actions **** to them were mostly comprehensive.								
Sanitation in Facilities	All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with applicable laws	The disinfections period against vermin and insects were not scheduled [timely].	Inspection of the records in the administrative department.			Factory should disinfect the factory, and develop a policy and procedure for the ongoing disinfection of the factory to be in compliance with applicable laws	Dec-03	Please submit copies of your policies and procedures for inspecting and maintain general factory conditions, and documentation that the factory has been disinfected.	Disinfection was conducted on 9/27/2003. Documentation was submitted to Reebok. The next disinfections is scheduled for 12/29/2003.			Reebok's local monitor re-audited the factory on 10/24/2003 and confirmed that the disinfection was conducted on 9/27/2003. She is waiting for documentation for the December disinfection, and copies of the factory's policies for regular maintenance.
Worker Participation	Workers should be involved in planning for safety, including through worker safety committees	Established fire and first aid teams were not renewed according to current conditions. Some of the members [have] quit the job. Previous team lists were posted on the notice boards.	Inspection of the health and safety issues.		Audit on 6/12/03; workers still do not know how to use extinguishers. Orientation training needed. /Audit on 8/8/03; both not provided. Will be provided till 8/15/2003. / Audit on 10/24/03; no training and no new fire team. Needed immediately.	(1) Each work area should have supervisors and workers who are professionally trained in first aid. It is recommended that at least 1% of the persons present during any shift are certified in first aid. Please conduct first aid training of existing workforce to meet this requirement. The factory should communicate to workers who is on the first aid team. (2) Supervisors and workers in each production area shall be trained how to use the fire extinguishers in the factory. Factory should establish policies and procedures for the regular training of workers on first aid and fire safety.	10/31/03	Please submit to Reebok the following documents: (1) Documentation of the trainings conducted on first aid and fire extinguisher training, including a list of trainees. (2) Information on how the first aid team and how it was communicated to workers. (3) Copies of the factory's policies and procedures for the regular and ongoing worker training on first aid and extinguishers.	No action taken.			Audit on 12/12/03; no action taken. Training will be given and documented, fire team will be created by 2/10/04. First aid team will be created till 3/1/04. Documentation will be submitted.
7. Freedom of Association and Collective Bargaining												
Employers will recognize and respect the right of employees to freedom of association and collective bargaining												
Employer Interference/Elections	Workers' organizations have the right to elect their representatives and conduct their activities without employer interference	Worker Representatives Committee was not meeting with the Management in the determined period (as two weekly or monthly) since May 2003 although the year 2002 decisions and meeting notes have been efficient and comprehensive.	Inspection all notice boards throughout the factory and individual/group/ management interviews.		Audit on 10/24/03; no meeting since 5/13/2003.	Meetings will be held regularly in each month and feedback will be posted for the workers to read.	No date given.	Please provide documentation to Reebok which demonstrates that management is meeting regularly with worker representatives and which demonstrates feedback is being posted	No action taken.			Meeting will be on 2/10/04; feedback will be posted. Documentation will be submitted to Reebok.
8. 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												
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	March and April 2003 overtime working records were not available. Back-up security of the e-media records was weak.	Inspection of the payrolls and payment calculation.			Reebok requires factories to maintain all time records and payroll records on file for the past year, to be made available for inspection. Please provide March and April 2003 overtime working records to Reebok's monitor for inspection	No date given.	Please provide March and April 2003 overtime working records to Reebok's monitor for inspection.	Documentation submitted to Reebok's monitor during her audit at the facility.	Dec-03	Documentation verified during a follow-up site inspection.	Reebok's monitor re-audited the facility on 12/12/2003, and confirmed that the overtime working time keeping records of March and April 2003 are available.

FLA Code/ Compliance issue	Benchmark or legal reference	Monitor's Findings	Findings			Remediation								
			Documentation	Best Practice	PC Internal Findings	PC remediation plan	Target Completion Date	Documentation Requested	Factory Response	Completion Date	Remediation Documentation Submitted	PC Follow-Up & Verification		
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	Turkish Labor Law / clause 41: O/T work shall not be over 60 hours/month and total over time works in a year shall not be more than 270 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	Some workers O/T work is over the defined legal 60 hours/month limit in November and December 2002 (e.g. [****] 75 hours and 71.6 hours; [****] 81.7 hours and 69.9 hours.	Inspection of the working hours in the personnel department		Audits on 10/24/2003 and 12/12/2003; the management agreed to work within the local overtime limits.	The management will plan to work within the local overtime limits. Factory must commit in writing to continue to abide by this Reebok working hours policy. Factory must submit working hour reports to Reebok's local monitor.	Jan-04	Please submit the following documents: (1) commitment letter, (2) working hour reports	The working hours will be submitted to Reebok on 2/9/2004.					
Legal compliance with protected workers	Turkish Labor Law / clause 73: The young workers under 18 years old shall not work at night shift in the industry. Night begins at 20.00. The factory will comply with all applicable laws governing work hours, including those regulating or limiting the nature and volume of work performed by women or workers under the age of 18.		[****] who is 17 years old has over time work over legal limit and after 20:00 in November 2002 (81.7 hours) and in December 2002 (69.9 hours) It's written in the factory's social accountability policy that the young workers shall not work more than 8 hours in a day and 40 hours in a week. This is not taken into consideration with any mechanism.	Inspection of the working hours in the personnel department.	Audit on 8/8/03; there are 14 young workers between 15-18 years old. They work 45 hours per week and stay for overtime work. Due to new local law valid since 6/10/03, young workers are not allowed to work more than 8 hours per day and 40 hours per week. It is required that the management will pay the difference of 5 hours per week to the workers on 9/5/03, train the workers about the new law and will not let them work more than 8 hours per day from 8/9/03 on. / Audit on 10/24/03: 9 young workers still working 45 hours and not paid of 5 hours overtime per week.	Please note the requirement stated above, on factory compliance with legal restrictions that apply to young workers, and the need for documented factory policies and procedures for the protection of young workers. The management needs to pay all workers the OT difference valid from 6/10/03, and they will work 40 hours per week immediately. Leave records of the 5 workers will be submitted. Training will be given to young workers and documented. Payrolls and time keeping records of 9 young workers will be submitted to Reebok.	11/5/03	Please submit to Reebok the following documents: (1) time records, leave records and payroll records of all young workers since 6/10/03, (2) copies of the factory's documented policies on young workers; (3) objective proof that young workers have been trained on the factory's policies	No action taken.				Reebok's local monitor re-audited the factory on 12/12/03 and young workers still working overtime, and no overtime difference paid. Overtime will stop and the difference valid from 6/10/03 will be paid on 3/5/04. Training will be given to young workers and documented by Mid-March. The payment, time keeping and training records, and the leave records of 5 workers will be submitted to Reebok on 3/15/04.	
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.														
Miscellaneous														