

*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	Turkey
Factory name	08007697B
IEM	SGS-Turkey
Date of audit	22-23 September 2003
PC(s)	Nordstrom
Number of workers	657
Product(s)	Denim outwear for men,women and kids
Production processes	Fabric cutting, sewing, ironing and finishing
Other brands in factory	

FLA Code/ Compliance issue	Benchmark or legal reference	Findings			Remediation			Updates		
		Monitor's Findings	Documentation	Best Practice	PC remediation plan	Completion Date	Documentation	Factory Response	PC follow up	Documentation
<b>1. Code Awareness</b>										
Code posting	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.	Code of Nordstrom, only posted on the wall of the dining hall at the 7th floor with other brands.	Inspection all notice boards throughout the factory		Nordstrom provides the factory with (1) poster of our Partnership Guidelines to post in a prominent location (ie: near timeclocks, main entrance, main exit, etc.) for all workers to review. This is not a violation as per Nordstrom standards.	COMPLETE				
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.			Social Compliance department was established in the factory						
<b>2. Forced Labor</b>										
<b>3. Child Labor</b>										
<b>4. Harassment or Abuse</b>										
<b>5. Nondiscrimination</b>										
<b>6. Health and Safety</b>										
Related Health & safety	<b>National Law:</b> 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. <b>National Law:</b> Working conditions of the pregnant women and new mothers and establishment of the breast feeding room and crèche regulation /clause 6: A breast feeding room or crèche will be established in the factory or will be arranged around the factory (250 meters away; if it is more further, transportation shall be provided) when the female population is over 150 in an organization.	1)No one more nurse according to population of the factory as required by the National Labor Law. 2)Leakage problem is seen on the female dressing room's and warehouse's ceilings at the 5'th and 6'th floors. 3)Frequency of the health and safety trainings and their efficiency were not satisfactory. Established fire and first aid teams were not known by all staff. 4)Caution signs were not identified on the chemicals in the sample washing unit. Chemicals are stored under the electricity panels. 5)Evacuation routes marking was not efficient in the cutting process's floor and in the warehouses. 6) Ventilation system in the ironing and sewing processes were not proper for the summer season. 7) Safety, injury and accident reports must be kept on site for one year.	From auditing of the production processes and locations. Comparing the implementations according to requirements of the labor law and regulations.	1) Detailed health trainings were scheduled for year 2004 by company Dr.including preventive health. 2)A contracted Creche was available for the new mothers. 3)Corrective actions were implemented against to common workplace injuries in year 2003 especially for the sewing process.	1) Factory to ensure that a sufficient number of nurses and/or first aid trained individuals are available in the factory according to Turkish Law. 2) Ensure that building is repaired and maintained to prevent any leaking/water damage. 3) It is the factory managements responsibility to ensure the safety of all workers by providing adequate training to all employees, providing appropriate PPE, training all workers in emergency evacuation, in addition to meeting all local laws and requirements as outlined by the government. 4) Chemicals must be labeled properly as to name and global symbols -- Chemicals must be stored in a suitable area dedicated to the storage of such materials, away from flammable areas. 5) An evacuation plan must be posted in prominent locations that are accessible to workers in all areas of the factory. 6) The factory must be adequately heated/cooled depending on the climate to provide a comfortable temperature for the workers. -- Air circulation systems must be operational. 7) Factories must have all safety accident reports on site for one year. Please provide this documentation for review,	Target: 10/31/2003 1) <b>Complete:</b> Factory has full-time physician and nurse on staff during working hours. Factory is prepared to hire more if number of workers increases as deemed by Turkish law. 2) <b>Pending:</b> will be verified by reaudit 3) <b>Pending:</b> Factory has posted names and pictures of all first aid team members in each section. Training updates are ongoing. -- will be verified by reaudit. 4) <b>Complete:</b> Chemicals have been correctly labeled and have been moved to a proper storage location away from electric panels. 5) <b>Pending:</b> Factory has painted yellow lines leading to emergency exits on facility floor. Waiting for verification that evacuation plan has been posted. 6) <b>Pending:</b> will be verified by reaudit 7) <b>Pending:</b> awaiting	1) Reaudit and photos 2) Pending 3) Pending 4) Photos 5) Photos 6) Pending 7) Pending			

FLA Code/ Compliance issue	Findings				Remediation			Updates		
	Benchmark or legal reference	Monitor's Findings	Documentation	Best Practice	PC remediation plan	Completion Date	Documentation	Factory Response	PC follow up	Documentation
<b>7. Freedom of Association and Collective Bargaining</b>										
Prevention of free association	FLA Code	The factory did not form a trade union or parallel means on independent worker representation, so the freedom of association and collective bargaining system did not seem effective. By the way, it's mentioned by the Top management that the worker representatives will be selecting in the following months in accordance to revised Turkish Labor Law requirements.	from interviews with the management and workers as face to face and focus group.		This is not a violation as per Nordstrom standards. However, please ensure that all workers have a way to communicate complaints, concerns to management. Workers must have the option to join an organized association as it is established in the factory. As the revised Turkish Law is set in place, ensure that factory policy follows those guidelines *Please note: Nordstrom Social Compliance policy neither promotes nor denies the establishment or existence of a union. Nordstrom asks factories to ensure that workers are allowed the opportunity to join a union on a voluntary basis or to participate in worker committees aimed at improving their work environment and/or experience.					
<b>8. Wages and Benefits</b>										
Provided benefits except wages				Free meal and transportation are provided by the company.						
<b>9. Hours of Work</b>										
Exceeding maximum legal daily/weekly/monthly work hours	<b>National Law:</b> O/T works shall not be over 60 hrs/month according to Turkish Labor Law./clause41	Some workers O/T work is over than defined legal 60 hrs/month limit in March 2003. ( e.g. Recep Aslan 92,4 hrs, Bayram Çelik 89,5, Ferhat Girit 86,17 hrs , small Yavuz 95,9 hrs, Mustafa Demir 106,1 hrs)	Finding from attendance & payroll records the factory provided		Work week hours must not exceed 60 hours/week including 12 hours/week of OT as per Nordstrom standards and detailed in the Partnership Guidelines. Increased OT due to peak production periods must explained and proven as such and must always be on a voluntary basis. -- UPDATE: 3/22/2004 - Nordstrom staff to visit factory during March 2004 to discuss OT issues and possible causes with factory management in effort to reduce hours and reiterate Nordstrom standard for compliant factories.	Target: Immediately - 10/20/2003 <b>Pending:</b> will be verified by reaudit <b>Pending:</b> reaudit will be scheduled after Nordstrom staff visit in March 2004.				
<b>10. Overtime Compensation</b>										