

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	36007617C
IEM	SGS
Date of audit	13-14 January 2004
Days in the facility	3 person days
PC(s)	PUMA
Number of workers	277 in ready-made + 135 in dyehouse
Product(s)	Apparel, fleece, hooded sweatshirt, teamwear, t-shirts, pants, shorts
Production processes	Textile, cut, sew, embellish, finish package. Fabric dye, wash, dry, finish (dyehouse)

FLA Code/ Compliance issue	Legal Reference	Findings				Remediation						
		FLA Benchmark	Monitor's Findings	Documentation	Best Practice	PC remediation plan	Target Completion Date	Factory Response	PC follow up	Documentation	Best Practice	
1. Code Awareness												
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 code of conduct of the participating brand was posted on the notice boards, some of the interviewed workers were not aware of the content	Inspection all notice boards throughout the factory and individual/group interviews.		All employees had been trained and reminded again about the Puma code of conduct on June 2005 (between 1th - 10th of JUNE 2005). Training attendance records have been kept, at the Quality Management and Industrial Relations	All issues to be resolved within a period of 6 months					
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.												
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 of abuse.												
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.												
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												
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		Training records and interviews.	Some of the trainings on preventive medicine (e.g.: Diarrhea risk in the summer and dehydration, sun burn, fungus and fungicides; childcare; [maternity] and family planning etc.) were provided by company doctor with necessary trainings [on] the workplace incidents/ accidents and potential risks of chemicals [commonly] used.							
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.	Dust level and air quality were not measured at the ready-made process. -Steel sole shoes were not provided for dyehouse maintenance process workers	Sight tour, measurement or inspection reports		Air quality had been measured by the accredited engineering consultants [on] 03.01.2005. There haven't [been] any [unacceptable] results (The reports are kept at the maintenance department.). Steel-soled shoes are provided for	All issues to be resolved within a period of 6 months					

FLA Code/ Compliance issue	Legal Reference	Findings				Remediation					
		FLA Benchmark	Monitor's Findings	Documentation	Best Practice	PC remediation plan	Target Completion Date	Factory Response	PC follow up	Documentation	Best Practice
Record Maintenance		All safety and accident reports shall be maintained for at least one year, or longer if required by law		Inspection of the records in HR departments	Very comprehensive data analysing on confronted health problems in a year according to dyehouse statistics.						
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	Dressing rooms and warehouses have no scheduled disinfection period. The same glass was being used for drinking water at the dyeing process.	Inspection of the records in relevant locations.		Plastic recycled glasses [are now used] for drinking water. Disinfection periods have being [scheduled and conducted]	All issues to be resolved within a period of 6 months				
Worker Participation	Turkish Labor Law/ clause 80& 82: In an industrial organization which employees more than 50 workers and works more than 6 months constantly, should establish a Health and safety committee. Employers shall carry out the decisions of this committee in the workplace. And a competent health and safety engineer should be employed according to risk level of the industry sector.	Workers should be involved in planning for safety, including through worker safety committees.	A competent health and safety engineer was not employed yet.	Inspection of the health and safety issues.		An engineer has been appointed as the health and safety [manager]. The certification program application [was sent] to Social Assurance and Labour Ministry of the Turkish Republic Government. The engineer has been waiting for [a response from the government] to attend to the certification courses	All issues to be resolved within a period of 6 months.				
Other/ Certificated Quality Systems					Both production plants have certificated ISO 9001 Quality management system for product conformity; certificated ISO 14001 Environmental management system was also existing in the dyehouse.						
7. Freedom of Association and Collective Bargaining											
Employers will recognize and respect the right of employees to freedom of association and collective bargaining											
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.	The O/T records were not kept in the dyehouse within the last 3 months. Previous hard copy records were sent to central archive in Istanbul. The records were not easily accessible on the e-media either	Inspection of the payrolls and payment calculation.	Monthly productivity was measurable for each employee in both production plants. This was considered for remuneration.	The factory in Istanbul is the headquarters; all original records [are] kept at [that] factory. The software records have been checked at the other apparel and dye plants. Dye plant is working two shifts, therefore there is no	Effective immediately.				
Other Benefits	Turkish Labor Law refers to Pregnant or maternity women's workable conditions and creche responsibility regulation/ clause 7: In a workplace, when the female population raises 100-150, a nursing room should be provided maximum 250 meters away from the workplace. When the population over than 250, a creche should be founded for the accommodation of the 0-6 aged children.		No nursing room or creche implementation in the workplace yet. (Number of female workers were 223 in the ready-made plant+17 in the dyehouse=250 during audit dates.)			Nursing rooms are provided, currently no further action required. Implementation of a creche should be considered for the future if number of female workers increases		All three factories have doctor and nursing rooms.			
9. Hours of Work											

FLA Code/ Compliance issue	Legal Reference	Findings				Remediation					
		FLA Benchmark	Monitor's Findings	Documentation	Best Practice	PC remediation plan	Target Completion Date	Factory Response	PC follow up	Documentation	Best Practice
		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 270 hrs/year for each worker	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	O/T worked hours total of per employee were not traced clearly neither in the ready-made production nor in the dyehouse in year 2004. Some of the records were either around the determined quota or exceeding. (e.g. max. 442 hrs.is seen; some others were 269,273 hrs.etc.)	Inspection of the working hours in the personnel department. Management Interviews		All overtime needs to be clearly documented and traced; legal requirements including annual limitations need to be observed and fully complied with	Effective immediately	Overtime records have been kept at all [of the factory's] plants, all records are clear and traceable.			
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											