

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	Bangladesh
Factory Name	10000590D
IEM	PHULKI
Date(s) in Facility	November 16 & 17, 2005
PC(s)	Phillips-Van Heusen Corp.
Number of Workers	530
Product(s)	Jacket, Pant, Shorts, Jogging Suit
Production Processes	Cutting, Sewing and Finishing

FLA Code/ Compliance Issue	Country Law/Legal Reference	FLA Benchmark	IEM Findings					Remediation					(Status)	
			Non-compliance	Risk of Non-compliance	Evidence of Non-compliance (un corroborated)	If not corroborated, explain why	Sources/Documentation used for corroborating	Notable Features implemented	PC Remediation plan	Target Completion Date	Factory Response (Optional)	Company follow up (Cite date of follow up)		Documentation
1. Code Awareness														
Code posting/Information		FLA Principle of Monitoring, Obligation of Companies: Establish and articulate clear, written workplace standards. Formally convey those standards to Company factories as well as to licensees, contractors and suppliers.	The Phillips-Van Heusen Codes are posted in Bangla and English only in the main entrance of the production floor but as some unused machines are dumped in front of the notice board it is difficult for the workers to go near and read them. In the production floor where the workers spend most of their time no PVH COCs are posted there.				Visual inspection, photograph		The PVH code of conduct poster will be moved to a location ore accessible to all workers.	January 1,2006		During our audit, COC posters were moved to an assessable location. Follow-up conducted on 6/20/06.	Observation.	Completed.
Worker/management awareness of Code		FLA Principle of Monitoring, Obligation 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.		The management arrange orientation program on COC for the workers after the recruitment. As the education level of these workers are very low, it is very difficult to understand COC through one day orientation.			Workers and management interview		Management needs to ensure that there are repeat and periodic trainings to ensure all workers are aware of the code of conduct elements.	December 1,2005	Workers training and motivation programs (Orally, written & Leaflets) have been initiated for all workers. The training team has been formed with Compliance Officer, Welfare Officers, Doctor and Nurses and training programs are being conducted on a regular basis with batches.	Even though factory has implemented a new workers training program during our follow-up interviews it was found that factory still needs to conduct refresher trainings. Follow-up conducted on 6/20/06.	Conducted workers interviews on June 20, 2006	Ongoing
Confidential non-compliance reporting channel		FLA Principle of Monitoring, Obligation of Companies: Develop a secure communications channel, in a manner appropriate to the culture and situation, to enable Company employees and employees of contractors and suppliers to report to the Company on noncompliance with the workplace standards, with security that they shall not be punished or prejudiced for doing so.		Company did not communicate about confidential non compliance reporting mechanism to general workers			Workers interview, management		Ensure all workers are aware of the confidential reporting mechanism and all are aware of its uses and benefits.	December 1,2005	Factory already has a confidential reporting mechanism in place such as whom to submit, how to address, where to address and what is the responsibility of management etc. Workers also can raise any non-compliance issue to management through complain boxes located at a secret place (near workers toilet). The boxes are open by management on a regular basis and replies are given through reply boards. Besides, all workers have always access to welfare officer, compliance officer, manager (HRD) and even plant-in-charge without any hesitation. ∴ Factory has already posted the grievance reporting mechanism at notice board. ∴ In spite of workers illiteracy the factory continues the program of communicating about grievance procedure orally and written in their native language. There is Lower and mid level management training program. ∴ The training team has been formed with Compliance Officer, Welfare Officers and training programs are being conducted on a regular basis with batches. ∴ The factory has taken the following aggressive programs for worker's awareness: i) Workers training and motivation program (Orally, written & Leaflets) for old workers. ii) Orientation program (Orally, written & Handbook) for new employees	Factory has some suggestion boxes, but will need to add others in the male toilets and communicate to all workers the process and use of confidential complaints. Follow-up conducted on 6/20/06.	Conducted workers interviews on June 20, 2006	Ongoing
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.														
Verbal abuse		Employers will prohibit screaming, threatening, or demeaning verbal language	The floor level management (supervisor, line chief, PM) some time screaming and use bad language with the general workers in case of making mistakes in their works.				Workers interview, management interview		This behavior must be eliminated immediately.	Feb-06	Factory management never tolerates such type of screaming and bad language used to workers by floor level management, rather management always instructs them to guide the worker in their work again and again when they make mistakes frequently. Whenever management will be informed about such kind of instance by any way, management will take necessary disciplinary action against the person/s at fault. Factory has already introduced an effective grievance handling procedure such as whom to submit, how to address, where to address and what is the responsibility of management etc. and it is made known to all workers and floor management so that such type of instance may be solved immediately. By this system workers can easily inform management their grievance. Besides, a worker can raise his/her grievance to management through complain box located in a confidential place by concealing his/her name and address. Factory has introduced a motivational training program for floor level management so that they are abstained from screaming or bad language and get the job done by workers creating a motivation in their feelings. Factory management always honors human dignity & prestige and tries to uplift it by creating a congenial working environment for all. Management has circulated a notice that if any body screams or uses bad language to any worker, the worker should inform management at once.	Factory has yet to take action on this issue. During our follow-up visit, auditor found that the issue still existed. Follow-up conducted on 6/20/06.	Conducted workers interviews on June 20, 2006	Ongoing
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.														

FLA Code/ Compliance Issue	Country Law/Legal Reference	FLA Benchmark	IEM Findings					Remediation					[Status]
			Non-compliance	Risk of Non-compliance	Evidence of Non-compliance (un corroborated)	If not corroborated, explain why	Sources/Documentation used for corroborating	Notable Features implemented	PC Remediation plan	Target Completion Date	Factory Response (Optional)	Company follow up (Cite date of follow up)	
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	As the aisles are blocked with various equipments, and the markings have been faded away, it may cause difficulty in evacuation of the workers in case of any emergency.			Visual Inspection, photograph		Aisles need to remain free of obstruction in case of an emergency and markings need to be redone	December 1,2005	All aisles are being kept unblocked and free of obstruction. Factory continues safety awareness program for workers and employees. Exit markings have already been repainted and it is being continued.	Factory still needs to work on this issue, including re-painting the faded exit markings. Follow-up conducted on 6/20/06.	Visual inspection.	Pending
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	Most of the time first aid box are not fulfill with adequate first aid kits/medicine. During the visual inspection the first aid box in the cutting section was found locked. One box in the production floor was totally empty and the remaining boxes were not properly equipped with necessary first aid materials.			Visual inspection, workers interview		Management needs to ensure all first aid kits remain unlocked and fully stocked of the necessary items.	December 1,2005	As glass of one first aid box was broken, the equipments were removed at once to avoid pilferage. The broken glass has also been replaced later on. First aid boxes are unlocked now and worker trained in first aid has been working near the box. Empty first box was refilled with equipments. All first aid boxes are properly equipped now.	Corrected. First aid boxes were found unlocked and fully stocked. Follow-up conducted on 6/20/06.	Inspection of first aid box by auditor on June 20, 2006	Completed
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	Some workers who work near fire extinguisher did not know how to operate it.			Visual inspection and workers interview		Factory needs to ensure that at least 40% of the total workforce is trained in the use of fire fighting equipment	January 1,2006	Factory has been training workers on the use of fire fighting equipment on a regular basis and the training will continue.	Factory needs to continue training workers so they can meet the 40% trained workforce requirement. Follow-up conducted on 6/20/06.	Conducted workers interviews on June 20, 2006	Ongoing
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	During the visual inspection 4 buckets found in the entrance of the production floor but those were empty (no water or no sand kept in them).			Photograph, visual inspection and workers interview			December 1,2005	Buckets have been filled with sand	Corrected. Follow-up conducted on 6/20/06.	Visual inspection.	Completed
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.	Access of the PPE in the cutting sections was found but not in use. The workers in the sewing section didn't have access to and were not using the PPE, although there was cloth dust.			Visual inspection, workers interview and management interview		Ensure the use of personal protective equipment to ensure workers health and safety	December 1,2005	All workers use protective equipment while working. Factory will continue to train workers to ensure that they know what the benefits are to such equipment.	Factory has yet to address this issue. Follow-up conducted on 6/20/06.	Visual inspection.	Ongoing
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	In the production floor 2 toilets are for the male workers, which does not comply with the local law (as per local law there should be 4 per 100 male workers).			Visual inspection, management interview and workers interview		Ensure there are an adequate number of male toilets, as per the legal requirement	December 1,2005	Factory has increased the number of men's lavatories/toilets, as per local legal requirement	Factory has yet to address this issue. Follow-up conducted on 6/20/06.	Visual inspection.	Ongoing
Sanitation in Dining Area		All food preparation shall be prepared, stored, and served in a sanitary manner in accordance with applicable laws. Safe drinking water should be available in each building.	One of the water tank from where the workers drink was without filter but there was no notice of caution. So the workers were drinking water from it.			Visual inspection, management interview and photograph		Factory management needs to ensure workers have access to safe potable water supply	December 1,2005	All water tanks now have functional filters. If something should happen to one of the filters, management will be sure to install a caution sign so that workers do not drink from that location.	Corrected. Follow-up conducted on 6/20/06.	Visual inspection.	Completed
7. Freedom of Association and Collective Bargaining													
Employers will recognize and respect the right of employees to freedom of association and collective bargaining													
Right to Freely Associate		Workers will have the right to establish and, subject only to the rules of the organization concerned, to join organizations of their own choosing without previous authorization. The right to freedom of association begins at the time that a worker seeks employment, and continues through the course of employment	There are no written policy to form a worker forum. The workers also not aware about worker forum.			Management interview, Workers' interview		Factory management needs to keep worker aware of their benefits, i.e., workers' form.	August 31,2006	Factory already has a written forum policy and also has a worker forum in place. Workers forum needs to be made functional and workers need to be made aware of the forum through continuous training/communication	Factory needs to create a workers forum and verbally instruct workers on how to use it. Follow-up conducted on 6/20/06.	Conducted workers interviews on June 20, 2006	Ongoing

FLA Code/ Compliance Issue	Country Law/Legal Reference	FLA Benchmark	IEM Findings					Remediation					Completed: Pending; Ongoing	
			Non-compliance	Risk of Non-compliance	Evidence of Non-compliance (un corroborated)	If not corroborated, explain why	Sources/Documentation used for corroborating	Notable Features implemented	PC Remediation plan	Target Completion Date	Factory Response (Optional)	Company follow up (Cite date of follow up)		Documentation
B. 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														
Timely Payment	Country Law : The wages of every person employed upon or in any factories or industrial establishment upon or in which less than one thousand person are employed, shall be paid before the expiry of the seventh days. The payment of wages Act 1936 (section 5).	All compensation shall be paid in a timely manner	Management did not pay worker total wages and benefit for a particular month at a time. They had paid in two installments. The payment of regular wages and benefits including normal OT (from 05:00 p.m to 07:00 p.m.) was started from 7th of the following month and the payment of excessive OT (work after 07:00 p.m.) and OT for working in weekly holidays were made after 20th of the following month. The both payments were going on up to last week of the month and books of accounts were closed in the end of that month.				Daily cash book, ledger, workers interview and management interview.		Factory needs to ensure all wages are paid in a timely manner and according to the legal requirement.	August 31, 2006	<ul style="list-style-type: none"> The factory management is fully committed to reduce the rest day work and excess OT works in future. If off days work is required, under extra ordinary business circumstances, the compensatory leave will be provided as per law and the reasons for excess OT work and rest day work will be recorded properly in a separate register. All working hours and rest day works will be recorded in the same time card and pay roll sheet for compensation. All kind of payments will be made by 7th. All workers will be advised not to remain absent or on leave during salary payment. 	Factory needs to discontinue practice of paying workers separately for OT. Separate payments are still being made on separate sheets, paid on separate dates. (From Dec 2005 till April 2006.) Follow-up conducted on 6/20/06.	Workers interview and inspection of payroll records	Ongoing
False Payroll Records		Employers will not use hidden or multiple payroll records in order to hide overtime, to falsely demonstrate hourly wages, or for any other fraudulent reason.	During the worker interview we have found that worker have to work in most of the weekly holidays (Friday) and done excessive OT after 07:00 p.m. But those working time were not recorded in the respective workers time card/punch card/ attendance register. The factory management had used separate sheets (called B sheets) for recording those excessive working times and their payments. Timekeeper maintained the time records of those excessive works and payments, were made after 20th of the following month.				Time cards, punch cards, attendance registers, time record sheets (B sheets) for excessive OT and working in weekly holidays (month of Dec 04, Jan 05, May 05, June 05, July 05, Aug 05, Sep 05 and Oct 05); workers interview and closing meeting discussion.		Management needs to identify reasons/causes for the excessive hours worked and determine alternative solutions to reduce the hours of work	August 31, 2006	<ul style="list-style-type: none"> The factory management is fully committed to reduce the rest day work and excess OT works in future. If off days work is required, under extra ordinary business circumstances, the compensatory leave will be provided as per law and the reasons for excess OT work and rest day work will be recorded properly in a separate register. All working hours and rest day works will be recorded in the same time card and pay roll sheet for compensation. All kind of payments will be made by 7th. All workers will be advised not to remain absent or on leave during salary payment. 	During our audit found "B Sheets" still being maintained until May 2006. Manual and computerized systems both show legal hours being recorded in separate records, and all excess hours over the legal limit are recorded in B Sheet. Follow-up conducted on 6/20/06.	Workers interview and inspection of payroll records	Ongoing

FLA Code/ Compliance Issue	Country Law/Legal Reference	FLA Benchmark	IEM Findings					Remediation				Documentation	Completed: Pending: Ongoing
			Non-compliance	Risk of Non-compliance	Evidence of Non-compliance (un corroborated)	If not corroborated, explain why	Sources/Documentation used for corroborating	Notable Features implemented	PC Remediation plan	Target Completion Date	Factory Response (Optional)		
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													
Weekly day off	Country Law: No worker shall be required to work for more than 10 consecutive days without a day off for whole day- Factories Act 1965 (section 51)	FLA Benchmark, 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. An extraordinary business circumstance is a temporary period of extra work that could not have been anticipated or alleviated by other reasonable efforts	In Dec 04 cleaner worked consecutively 21 days and finishing section for 13 days. In January 05 cleaner, finishing, QC, helper, operator and cutting section had worked consecutively for 20 days. In May 05 cleaner worked for 31 days and finishing section workers worked for 11 days. In June 05 cleaners worked for 30 days: helper/cutting/finishing section workers worked for 16 days and QC section worked for 13 days consecutively. In July 05 cleaners worked for 31 days and operator/helper/QC/finishing section worked for 13 days consecutively. In September 05 cleaners worked for 30 days and operator/helper/cutting/QC/finishing section worked for 14 days in a row. In October 05 cleaners/ helper/QC/finishing section workers worked for 31 days consecutively.			Time record sheet (B sheet) for excessive OT and working in weekly holidays (month of Dec 04, Jan 05, May 05, Aug 05, Sep 05 and Oct 05)		Management needs to identify reasons/causes for the excessive hours worked and determine alternative solutions to reduce the hours of work	August 31, 2006	The Factory Management has taken the following steps to reduce excess OT and off day work in future. <ul style="list-style-type: none"> Reducing overall orders in excess of factory capacity. Proper production planning for 8 working hours as per time study record. With concerted effort and monitoring production floor personnel. <ul style="list-style-type: none"> Increasing work force in finishing areas. Increasing efficiency with the on job training programs. Avoiding change of styles frequently. Providing legal compensations as and when required. Offering incentive for regular presence of the workers. Developing a timely supply chain from store to finishing level for better productive efficiency. In future, if off day work is required, under above circumstances, compensatory leave will be provided as per law so that workers are not required to work more than consecutive 10 days. 	During follow-up visit our auditor found that the issue of no rest day per 7 day period still persisted. Follow-up conducted on 6/20/06.	Workers interview and inspection of payroll records	Ongoing
Overtime Limitations	Country law : No adult workers shall be required or allowed to work in a factory for more than nine hours in any day. Provided that, subject to the provisions of sections 50, 54, 55 and 58 an adult worker may work in a factory for more than nine hours, but not exceeding ten hours in any day. Factory Act 1965 (section 53).	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	Along with the regular working hour (8 hrs.) in a day, in the last 12 months, the cleaners have worked on an average 137 hours per month, with a maximum of 162 hrs in Oct 05, which has come out to an average of 31 hrs OT in a single week. The workers of finishing, QC section had done excessive OT in the month of Dec 04, Jan 05, Feb 05, June 05, July 05, Sep 05 and Oct 05. The helper/operator had done excessive OT in the month of Jan 05, June 05 and July 05. The cutting section had done excessive OT in the month of May 05, Jan 05 and Jul 05.			Time recording sheets (B sheet for the month of Dec 04, Jan 05, May 05, June 05, July 05, Aug 05, Sep 05 and Oct 05); workers interview and management interview.		Management needs to identify reasons/causes for the excessive hours worked and determine alternative solutions to reduce the hours of work	August 31, 2006	The Factory Management has taken the following steps to reduce excess OT and off day work in future. <ul style="list-style-type: none"> Reducing overall orders in excess of factory capacity. Proper production planning for 8 working hours as per time study record. With concerted effort and monitoring production floor personnel. <ul style="list-style-type: none"> Increasing work force in finishing areas. Increasing efficiency with the on job training programs. Avoiding change of styles frequently. Providing legal compensations as and when required. Offering incentive for regular presence of the workers. Developing a timely supply chain from store to finishing level for better productive efficiency. In future, if off day work is required, under above circumstances, compensatory leave will be provided as per law so that workers are not required to work more than consecutive 10 days. 	Factory needs to make improvements in this area and find other solutions to high production targets, so that workers no longer need to work over the legal limit. Follow-up conducted on 6/20/06.	Workers interview and inspection of payroll records	Ongoing
Voluntary OT		Overtime hours worked in excess of code standard will be voluntary	Although the management had circulated a notice for voluntary OT but they could not refuse OT and had to work for 13 hours in days. The production target is also very high and some time the worker (those who could not fulfill their target) had to work over night.			Worker interview and notice for overtime.		Management needs to ensure all workers are aware of their policy of voluntary overtime. In addition, management needs to reduce the production target as this may result in increased overtime and possible overnight work.	February 1, 2006	Factory management is fully committed to reducing excessive overtime. Workers have been trained that overtime work is voluntary and they may refuse if they want.	Voluntary OT system should be implemented. There are no signatures of workers in the OT requisition sheet. Follow-up conducted on 6/20/06.	Workers interview and inspection of payroll records	Ongoing
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													