

*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.

<b>FLA Audit Profile</b>	
Country	Turkey
Factory name	360076416E
IEM	SGS
Date(s) in facility	10/3/2006
PC(s)	Puma AG
Number of workers	485
Product(s)	Garments made from woven fabric
Production processes	Cutting, embroidery, sewing, yarn cleaning, final control and

FLA Code/ Compliance issue	Country Law/Legal Reference	FLA Benchmark	IEM Findings					PC Internal audit findings (Optional)	PC Remediation plan	Target Completion Date	Remediation			Documentation	[Status]	Updates (Cite Date of Follow up)	Documentation	Third Party Verification (Date)	Company Verification (Cite date of planned or follow up visit, if appropriate)	Follow up
			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 by Factory Management or Company	Factory Response (Optional)	Company follow up (Cite date of follow up)							
<b>1. Code Awareness</b>																				
<b>2. Forced Labor</b>																				
There will not be any use of forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise.																				
<b>3. Child Labor</b>																				
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.																				
<b>4. Harassment or Abuse</b>																				
Every employee will be treated with respect and dignity. No employee will be subject to any physical, sexual, psychological or verbal harassment or abuse.																				
Other				Procedure is in accordance with Turkish law, but no written policy and declaration of it.				Recommend writing a policy on harassment and abuse and a discipline procedure and declaring it.		3/31/2007		Partly included in Factory's own policies.	S.A.F.E. Audit 10/01/2007	Ongoing	Written policies existing and posted on notice board. After the democratic election workers representatives will be placed in the committee 03/12/2007.	Follow up visit 10/28/2007				
<b>5. Non-discrimination</b>																				
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.																				
Other				There is no policy or procedure concerning non-discrimination.				Recommended writing a company policy concerning non-discrimination.		3/31/2007				Completed	The company already added the non discrimination policy into the internal rules and regulations.	Follow up visit 10/28/2007				
<b>6. Health and Safety</b>																				
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.																				
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 is no air measurement, though noise measurement of 75 dB is OK.			Measurement report checked.		Both noise and air quality check was made (Audit 10/01/2007).			Both noise and air quality check was made (Audit 10.01.07).	Audit 10/01/2007	Completed						
Chemical Management		All chemicals and hazardous substances should be properly labeled and stored in accordance with applicable laws. Workers should receive training, appropriate to their job responsibilities, in the safe use of chemicals and other hazardous substances.		The hazard sign is not seen on the stain remover and one of the workers was not trained about harmness of the chemical				MSDSs not posted at cleaning gun station.		3/31/2007		Material Safety Data Sheets should be posted where hazardous materials are stored and used (printing and spot cleaning section). All chemicals containers should be labeled with hazard signs.	Audit 10/01/2007	Ongoing	The hazard sign is still missing in the room. Ventilation is not properly connected outside. Worker in the room was trained. Action requested and will be finished on 03/11/2007.	Follow up visit 09/28/2007				
Machinery Maintenance		All production machinery and equipment shall be maintained, properly guarded, and operated in a safe manner.		The pressure vessels are not fixed to the ground in auxiliary facility and the guards are not in place for the compressor.					All regulations regarding pressurized equipment must be followed.					Completed	The pressure vessels are fixed to the ground in auxiliary facility and the guards are in place.	Follow up visit 09/28/2007				
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.		Potable water analysis and potter inspections on kitchen staff are not done periodically.					A recent microbiologist analyses and reports of drinking water must be obtained. Tests should be repeated in regular intervals.				Done and checked at last audit (10.01.07).	Completed	Report available for water on 04/30/2007. Air quality checked and reported by a professional company.	Follow up visit 09/28/2007				
<b>7. Freedom of Association and Collective Bargaining</b>																				
Employers will recognize and respect the right of employees to freedom of association and collective bargaining.																				
Employer Interference/Election		Workers' organizations have the right to elect their representatives and conduct their activities without employer interference.		Worker representatives in the committees are not elected by the workers.					Freedom of association must be ensured. Restrictions to the right of strike will be ceased by 2010 according to free zone regulations.			A workers council has been elected. Documentation was presented, however not all workers were aware.	Audit 10/01/2007	Ongoing	A new democratic election and records requested for the workers representatives. Factory will take the action 03/12/2007.	Follow up visit 09/28/2007				
<b>8. Wages and Benefits</b>																				
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.																				
Pay statement	Legal requirement	Employers will provide workers a pay statement each pay period, which will show earned wages, regular and overtime pay, bonuses and all deductions.		Wage slip is not given to workers.					Detailed wage slips must be given to the workers each month.	12/15/2006		Paystips are now handed out to all staff (10.01.07).	S.A.F.E. Audit 10/01/2007	Completed	Some workers not clear about reviewing pay slips. Factory declared that the pay slips will be given to all workers from 09/15/2007 monthly.	Follow up visit 09/28/2007. Confirmation received from factory on 10/17/2007.				
Legal benefits	According to Turkish law if there is more than 150 women, such facilities are necessary.	Employers will provide all legally mandated benefits to all eligible workers.		There is not a nursery and breast feeding room.					A breast feeding room and nursery must be made available.	5/25/2007		The clinic room serves as breast feeding room (10.01.07).	S.A.F.E. Audit 10/01/2007	Completed	As the company is located in a free zone, no nursery is available and required. However, the company has made an arrangement with a brother company that their nursery can be used instead.	Follow up visit 09/28/2007		There is still no nursery. The clinic room is available for breast feeding.		
<b>9. Hours of Work</b>																				
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.																				
<b>10. Overtime Compensation</b>																				
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.																				
<b>Miscellaneous</b>																				