

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	China
Factory name	240015120B
IEM	Kenan Institute Asia
Date of audit	30-Oct-03
Days in the facility	1 day
PC(s)	Global Accessories
Number of workers	330
Product(s)	Plastic goods
Production processes	Assembly line

		Findings						Remediation	
FLA Code/ Compliance issue	Legal Reference	FLA Benchmark	Monitor's Findings	Documentation	Best Practice	PC Internal audit findings	PC remediation plan	Target Completion Date	Factory Response
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.	Workers interviewed have no knowledge about a code of conduct. The management is not familiar with the FLA.	visual inspection and management interview		Complete.	Global will provide another copy of code of conduct to Factory	February 29, 2004	Factory will have code translated and posted.
Confidential non-compliance reporting channel		FLA Principles of Monitoring, Obligations 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.	There is only a suggestion box in the factory.	management interviews, worker interviews		Complete.	Develop procedure to enable employees to communicate with management regarding problems and concerns.	February 1, 2004	Factory will install suggestion box. This fits best with local culture and allows the employees to communicate without fear of punishment or prejudice. Management will respond to each recommendation in writing.
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									
Recruitment Contracts	The provision issued by the state government says that 1.If workers' lineal relatives die, workers can get one to 3 days off according to the situation. 2.If workers get married, workers can get one to seven days off according to the situation. 3.Workers can ask for leave to visit their family members.	There can be no employment terms (including contracts, recruitment arrangements, or any other instruments) which specify that employees can be confined or be subjected to restrictions on freedom of movement; allow employers to hold wages already earned; provide for penalties resulting in paying back wages already earned; or, in any way punish workers for terminating employment. (It is acceptable to provide bonuses to workers who stay for a term of contract and meet reasonable conditions, such as regular attendance, punctuality, good quality, etc	Some content in the workers' labor contracts are not compliant with the Chinese Labor Law. For example, the worker's contract states worker cannot ask for leave for marriage, tour, or any private affairs.	record review		Complete.	Change labor contract to agree with labor law of China.	December 1, 2003	The factory has adjusted their work's labor contract to comply with Chinese Labor Law.
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 or abuse.									

			Findings					Remediation	
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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									
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	1.The exit and emergency lights of the second, third and fourth floors don't work when the power is cut. 2. There is a main strobe for alarm, which is usually shut off.	visual inspection		Complete.	Add Back up system to exit lights to assure they remain operational when power is off. Turn on Alarm strobe always	December 1, 2003	The factory has changed to make sure all emergency lights and alarm strobe remain on at all times.
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	The medicine in the first aid kit in the dormitory is not properly maintained and the printing workshop has no print workshop.	visual inspection		Complete.	Assure First Aid kits are restocked and a procedure put in place to inspect and refill monthly.	December 1, 2003	The medicine in the first aid kit has been re-supplied. A person has been assigned to check the supplies at least monthly to make sure the first aid kit remains full.
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.	In compliance	visual inspection	Workers use gloves, carbon mask, cap, boots, mask, apron and uniform to protect themselves.				
Chemical Management	Article 53 Facilities of occupational safety and health must meet the standards set by the State. Facilities of occupational safety and health for a newly-built, renovated or expanded project must be designed, constructed and put into operation or use simultaneously with the main part of the project.	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 main chemical storehouse is established at the front gate. The chemicals are piled up with two or three tiers. The ventilation is not good. And the storing area doesn't have a good heat insulation system, which poses a fire risk in hot weather.	visual inspection and records review		Complete.	Build Racking to better organize, Ventilate storage area, also insulate the area	December 1, 2003	The factory has built racks for the proper storage of chemicals. The ventilation has been improved and insulation added.
Chemical Management	Article 53 Facilities of occupational safety and health must meet the standards set by the State. Facilities of occupational safety and health for a newly-built, renovated or expanded project must be designed, constructed and put into operation or use simultaneously with the main part of the project.	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 management of the hazardous waste is not qualified, which leads to environment pollution.	visual inspection and records review		Complete.	Train management for proper disposal of Hazardous waste. Create procedure for handling waste ongoing.	March 1, 2004	The factory has established a procedure for handling hazardous waste. The factory is looking for training class to send manager to for better understanding of handling hazardous waste.
Chemical Management	Article 53 Facilities of occupational safety and health must meet the standards set by the State. Facilities of occupational safety and health for a newly-built, renovated or expanded project must be designed, constructed and put into operation or use simultaneously with the main part of the project.	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	No emergency eye wash near the usage and storage of chemicals.	visual inspection and records review		Complete.	Install eyewash apparatus in printing department.	December 30, 2003	The factory has installed a faucet near the printing department that can be used for emergency eye wash.

Findings									Remediation	
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Ventilation/Electrical/facility maintenance	Article 54 The employing unit must provide laborers with occupational safety and health conditions conforming to the provisions of the State and necessary articles of labor protection, and provide regular health examination for laborers engaged in work	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	The main electrical distribution house is established in the workshops under the stair near the front gate, which is not qualified. It maybe a potential cause of a fire.	visual inspection		Complete.	Move electrical house or develop alternative plan for safeguarding.	November 30, 2003	Because all the electrical houses have been set up when the factory was built, it would be very difficult to move immediately. The factory will have warning sign installed outside the room. There will be a person assigned from management who will inspect the room each day. Also, the workshop has other emergency exits.	
Ventilation/Electrical/facility maintenance	Article 54 The employing unit must provide laborers with occupational safety and health conditions conforming to the provisions of the State and necessary articles of labor protection, and provide regular health examination for laborers engaged in work	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	The ventilation in the printing section is not good. There are approximately 8 to 10 persons among 300 workers who have skin hypersensitivity. The potential cause is poor ventilation in the printing workshop. However, proper analysis will require air sampling and chemical exposure testing.	visual inspection		Complete.	Improve ventilation in print room.	January 1, 2004	The factory closed all the windows and turned off the fans and other ventilation because of bad weather. From now on, the factory will open all the windows and turn on fans and other ventilation during working time.	
Record Maintenance		All safety and accident reports shall be maintained for at least one year, or longer if required by law	There is no complete system for health and safety. Fire fighting drill and other trainings are not normal. So the record for health and safety is not completed.	records review		Complete.	Establish a way to document each accident and establish a safety training record for each employee. PC will provide copies of forms used in the US for tracking training and documenting accidents.	March 1, 2004	The factory will translate forms supplied by PC into Chinese and then establish procedure for documenting training and filing and maintaining records of each accident.	
Machinery Maintenance		All production machinery and equipment shall be maintained, properly guarded, and operated in a safe manner	1.The machines used in heating section lack of proper protection equipment. 2. The noises made by two machines used to clinch clasps are at a very high decibel .	visual inspection		Complete.	Properly safeguard the heating section machines, provide ear protection equipment for workers operating loud machines.	December 1, 2003	The factory has added the guards to the machines in the heating section. The factory has provided hearing protection for employees who work in areas where noise levels are excessive.	
Machinery Maintenance		All production machinery and equipment shall be maintained, properly guarded, and operated in a safe manner	The electrical machinery in the raw material storehouse has no grounding.	visual inspection		Complete.	Ground Equipment as needed	December 1, 2003	The factory has grounded the electrical equipment.	
Machinery Maintenance		All production machinery and equipment shall be maintained, properly guarded, and operated in a safe manner	The zero wire of an electronic machine was cut on purpose.	visual inspection		Complete.	repair machine	December 1, 2003	The factory has repaired the wire on the electronic machine.	
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 toilet in the storehouse smells bad.	visual inspection		Complete.	Improve ventilation	November 30, 2003	The factory has improved the ventilation.	
Sanitation in Dormitories		All dormitories shall be kept secure, clean and have safety provisions (such as fire extinguishers, first aid kits, unobstructed emergency exits, emergency lighting etc.). Emergency evacuation drills should also be conducted at least annually	Workers' dormitories are not clean and tidy.	visual inspection		Complete.	Establish dormitory cleanliness standards and assign a person or persons each week with responsibility to clean dormitory.	November 30, 2003	The factory has established the procedure for what has to be cleaned. They have also established a list of persons who are responsible to clean the dormitory each week.	

Findings								Remediation	
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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									
Legal benefits	Article 72 The sources of social insurance funds shall be determined according to the branches of insurance, and an overall raising of social insurance funds shall be practiced step by step. The employing unit and laborers must participate in social insurance and pay social insurance premiums in accordance with the law.	Employers will provide all legally mandated benefits to all eligible workers	Only 8 managers have retired security and 10 managers have the unemployment social insurance, 121 workers and managers have industrial injury insurance. The factory explained that the local government agrees, which violates the social insurance law and regulations.	worker interview, records review		Complete.	The factory needs to obtain the proper approval from the Chinese government.	January 1, 2004	The factory has approval from the local government because of the difference in laws and regulations between each province in China. The factory does not offer unemployment social insurance to all workers because most of the workers come from different provinces and are somewhat transient. The local government has approved the practice whereby the social unemployment insurance is only offered to employees under contract to the factory. A copy of the document from the local government is attached. The factory states they are approved as a supplier to Wal-Mart.
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									
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.									