

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	180015117B
IEM	SGS
Date of audit	September 18-19, 2003
Days in the facility	2 days
PC(s)	MBI
Number of workers	300
Product(s)	Football Clock
Production processes	Preparation, Polishing, Coating, Assembly & Packing

		Findings				Remediation				
FLA Code/ Compliance issue	Legal Reference	FLA Benchmark	Monitor's Findings	Documentation	Best Practice	Target Completion Date	Factory Response	PC follow up	Factory Follow UP 3/4/2004	Documentation
1. Code Awareness										
Code posting/information		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.	The factory did not establish such workplace standards and convey those standards to employees, contractors and suppliers.			Completed	On Sept. 30, factory posted "workplace standards" on a permanent & noticeable place inside factory.			Photos attached
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.	FLA Principles or the FLA-approved PC's Principles were not posted at workplaces and/or in the dormitory area, the management did not know the principles either, for they supplied the products to MBI through a trading company, the trading company did not convey the principles to them.			Completed	Separated workers into teams, then from 10/3 through 10/9 educated workers of each team about the standards of workplace by the managers. Each manager will review with their group of workers at the beginning of every month. New workers will take a course from their manager about the workplace code in the first working week.		Manager will take training course on FLA code elements such as evacuation drills, facility usage, new protective equipment use, introduction, etc. [on a] quarterly [basis].	Photos attached
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.	No such communication channel was established.			Completed	Set up an "employee welfare committee" to communicate with the managers monthly. The first meeting was on 10/5 and the major subject the committee brought up was separating the dormitory from the production area. The managers and the committee approved the proposal and have established a separate committee to handle the proposal.	On 10/20 the committee chose an agent to take care of the dormitory issue and will start working on 10/28/03. The current schedule is as below: 10/28-11/28: female dorm, bathroom of dormitory 11/28-12/28: male dorm 12/28-1/28/04: dorm for management staff, canteen.	Each department voted and chose one representative to be member of committee. Before meeting each month, each department will hold an internal meeting and let their representative know what they would like to reflect to committee. After meeting, the records will be posted to the public.	
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										
Confiscated Original documentation	The clause 24 of The Implementation Provisions on China Labor Law. The employer shall not lodge deposit, guarantee fee or goods at the time of signing labor contract with employee.	Workers will retain possession or control of their passports, identity papers, travel documents. Employers will not retain them to restrict workers' access to their personal identification documents, or to ensure that workers will remain in employment in the factory. Employers may obtain copies of original documents for record-keeping purposes	Through interview with workers and the management, the factory would hold workers' ID paper for one month, the management stated that it could ensure workers' remaining employment in the factory.			This has been announced to all workers.	1. This rule has been removed for months, ID's of employees were returned to employees. 2. Factory managers only keep copies of employees' ID. 3. Nevertheless, the policy was reiterated to all workers.			
Recruitment Contracts		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	The factory rules were stipulated that workers would be warned, gigned and fined if she/ he broken the rules. Fines records were maintained. No formal employment contract signed with workers. The factory provided a collective contract signed by the management, not signed by workers themselves, and workers did not know about the contract.			Completed	10/6: The factory confirmed that all workers received the contracts and understood the detail. Nevertheless, the managers still allow workers 7 days to decide whether to sign the contracts.	The factory also cites details of the workplace code of conduct in the contracts to ensure each worker has written proof of their privileges including components related to: 1. Working hours 2. OT compensation: 3. Freedom of movement. 4. Discrimination. 5. Voluntary labor 6. Child labor...etc.	All workers have signed the contracts and fully understand the content of contract. For new workers, interviewer will explain general idea of the working place code and also all relevant welfare factory provides and duty each worker should fulfill before they sign the contract.	

FLA Code/ Compliance issue	Findings					Remediation				
	Legal Reference	FLA Benchmark	Monitor's Findings	Documentation	Best Practice	Target Completion Date	Factory Response	PC follow up	Factory Follow UP 3/4/2004	Documentation
Recruitment Fees	The clause 24 of The Implementation Provisions on China Labor Law.	Deductions for repayment of any recruitment fees will not be made without the consent of the worker.	Through interview with workers and the management, workers would be [docked] RMB 40 as recruitment fee, and the money would not be returned to workers.			Completed	Factory has removed this policy from factory rules.		Recruitment fees have been paid back to workers [as of] Nov. 12.	
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.										
Age Verification	The clause 15 of China Labor Law. Employer must not employ child labor under the age of 16 year old.	In those cases where proof of age documentation is not readily available, employers will take precautions to ensure that all workers are at least the minimum working age, including medical or religious records, or other means considered reliable in the local context.	One worker's personal file had no copy of ID paper. It was registered that she was born on April 5, 1987 and entered into the factory on February 25, 2003; she did not reach 16 years old at that time. Through interview with her, she said she was born in 1985, and her ID paper was lost. She was not required to provide other age documents by the factory.			Completed	Factory has rechecked ID and age of all employees and also confirmed all employees were over minimum working age when they entered the factory.		Personnel manager has confirmed each worker's ID card is real by checking the laser label (government put on ID card to prove the authenticity).	
Legal compliance for juvenile workers	The clause 28 of China Juvenile Person Protection Law. While employing young workers of 16-18, the employer shall follow the regulations on job, working hours, physical labor intensity, and protective measures and no heavy, toxic, harmful or dangerous work is allowed to arranged to young workers.	Employers will comply with applicable laws that apply to young workers, i.e., those between the minimum working age and the age of 18, including regulations relating to hiring, working conditions, types of work, hours of work, proof of age documentation, and overtime	24 young workers were verified during the audit, some young workers were arranged working on polishing & repainting process, sometimes they would [be in] contact [with] chemical substances such as paints & thinner. [Their] *** OT [hours were the] same as other workers: 3-5 OT hours a day, sometimes worked OT till next morning.			Completed	Factory re-assigned workers between 16 - 18 years of age to parts assembly or packaging and away from chemical-related jobs. Factory managers have reduced overtime hours (see further commentary below).	Factory adjusted production schedule from October 1, 2003 based on legal workload for each worker. Every other week, the manager of each department now reviews the order status and the OT records and verifies that the OT of each worker meets local labor laws.	The Welfare Committee also has a copy of the employee list. They play a supervising role in management to do a routine follow up the status of each teenage worker.	
Juvenile worker Identification System	The clause 6 & 9 of Provisions on young Workers Protection. Employers shall arrange regular health examination for young workers. The state shall practice registration systems for young workers employment and special protection.	Employers will have a system for identifying work stations and operations that are inappropriate for young workers according to applicable laws	The factory did not establish such system, the factory did not obtain registration from local government and did not arrange health examination as per legal requirements.			Completed	The factory arranged for the workers aged 16-18 to have the health examination.			
Lack of protection of under-age workers	The clause 28 of China Juvenile Person Protection Law.	Employers will ensure that, all workers engaged in operating or working close to hazardous equipment, working at dangerous heights or lifting heavy loads, or exposed to hazardous substances, are above the legal age for such work.	The factory arranged some young workers on polishing & repainting process, sometimes they would contact chemical substances such as paints & thinner.			Completed	Employee welfare committee was authorized to identify the working environment for young workers on behalf of all workers and make proposals for managers consideration.		The Welfare Committee also has a copy of the employee list. They play a supervising role in management to do a routine follow up the status of each teenage worker.	
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.										
Freedom of Movement		Employers will not unreasonably restrain freedom of movement of workers, including movement in canteen, during breaks, using toilets, accessing water, or to access necessary medical attention	From fine records the factory provided, workers were fined RMB 25 if she/ he went the toilet or [the] water [fountain] without leave permit.			Completed	The factory has removed these policies from their rules.			
Monetary Fines and Penalties		Employers will not use monetary fines and penalties for poor performance	From fine records the factory provided, workers were warned and fined RMB 10-45 if she/ he broke the factory rules.			Completed	The factory has removed these policies from their rules.			
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										

FLA Code/ Compliance issue	Findings					Remediation				
	Legal Reference	FLA Benchmark	Monitor's Findings	Documentation	Best Practice	Target Completion Date	Factory Response	PC follow up	Factory Follow UP 3/4/2004	Documentation
Fire Safety Health and Safety legal compliance	The clause 61 of China Construction Law and the clause 10 of China Fire Prevention Law. The clause 9 &10 of Temporary Regulations on Boiler and Pressure Bessel Safety Supervision	Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits	The factory did not provide Building Construction Safety Certificate for workshop building, Building Construction Safety Certificate & Fire Safety Certificate for dormitory building. The factory had no Registration Permit and Annual Inspection Certificate for air pressers & vessels.			The improvements to the dormitory are to be completed by January. Obtained all certificates for building construction safety on Nov. 3	The factory has obtained all necessary certificates to meet the requirements of local government including building construction safety, fire safety certificate for dorm building and also annual inspection results for air pressers and vessels. As the improvement required on the dorm is a huge job, factory will need approximately 2-3 months to improve their dormitory but please be assured that factory is moving forward to improve the living standard of workers.			
Document Maintenance/ Accessibility	The clause 20 of Safe Use of Chemicals at Workplace Provisions. The using unit shall communicate the MSDS of dangerous chemicals to employees and provide regular training no how to use it safely.	All documents required to be available to workers and management by applicable laws (such as policies, MSDS, etc.) shall be made available in the prescribed manner and in the local language or language spoken by majority of the workers if different from the local language	There were no MSDS in chemical warehouse and workplaces.			Completed	The factory posted and informed workers about the location of all dangerous chemicals at the end of September.	Please refer to photos		
Evacuation Procedure	The clause 16.4 of China Fire Prevention Law. Establish fire fighting and emergency evacuation program, conduct emergency evacuation drills periodically.	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	There was no evacuation plan in the dormitory **** and the factory did not conduct evacuation periodically.			Completed	The factory practiced evacuation on 10/5 and will do so quarterly.	Please refer to photos.	Evacuation plan has been posted in factory and also dormitory area by Oct. 5.	
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 first aid kit were empty or inadequate with supplies. Some first aid kits had only pledget or iodine inside.			Completed	The factory has prepared the medical equipment and will monitor it weekly to ensure adequate supplies are provided.	Please refer to photos.		
PPE	The clause 54 of China Labor Law. Employer must provide employees with occupational health and safety conditions conforming to the provisions of the state and necessary personal protective equipment.	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.	No earplugs provided for preparation workers, no goggles provided for grinding workers, no masks provided for polishing & repainting workers, and cotton masks provided for spray painting workers were inappropriate.			Completed	The factory has provided all necessary protective equipment to workers who will be exposed in dangerous environment.	Please refer to photos.	Manager of Equipment Dept will review the quantity, quality and valid date of all protective equipment monthly to make sure every worker has enough protection.	
Chemical Management for Pregnant women and juvenile workers	The clause 28 of China Juvenile Person Protection Law.	To prevent unsafe exposure to hazardous chemicals, appropriate accommodations shall be made for pregnant women and minors as required by applicable laws in a manner that does not unreasonably disadvantage employees	The factory arranged some young workers on polishing & repainting process, sometimes they would contact chemical substances such as paints & thinner.			Completed	The factory has made appropriate adjustments to the working environment of its younger workers.			
Ventilation/Electrical/facility maintenance	The clause 54 of China Labor law. The clause 38 of Warehouse Fire Safety Management Code.	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	There was no exhaust ventilation system installed in paints mixing room, and the factory could not provide recent air quality test report. Most electrical cases had no cover. There were no explosion-proof lights installed in material warehouse.			Completed	The factory added the exhaust ventilation system in the paints mixing room as well as the covers to the electrical case. The factory also installed an explosion proof light.	Please refer to photos.		
Record Maintenance		All safety and accident reports shall be maintained for at least one year, or longer if required by law	The factory could not provide accident reports for review, for the management stated they had no work injuries occurred before and no accident reports. But from payroll and work time records, some workers had work injury leave.			Completed	The factory is now recording all accidents.		Accident records are kept for all injuries	
Machinery Maintenance	The clause 32 of Regulations on Health and Safety in factory. Protection device shall be installed for the dangerous parts such as transmission belt, exposed gear, rotating axis, belt wheels and flying wheels.	All production machinery and equipment shall be maintained, properly guarded, and operated in a safe manner	Some sawing machines, planers and air pressers had no safety cover on moving belt.			Completed	The factory added covers to the sewing machines, planers, and air pressers.	Please refer to photos.		

FLA Code/ Compliance issue	Findings					Remediation				
	Legal Reference	FLA Benchmark	Monitor's Findings	Documentation	Best Practice	Target Completion Date	Factory Response	PC follow up	Factory Follow UP 3/4/2004	Documentation
Sanitation in Dormitories	The clause 14 & 16 of China Fire Prevention Law.	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	There were no fire extinguishers, exit marks, emergency lights and first aid kits installed in dormitory areas. No evacuation drills was conducted periodically.			Completed	The factory added fire extinguishers, exit marks, emergency lights, and first aid kits to the dorm and will conduct evacuation drills quarterly.			
Worker Participation		Workers should be involved in planning for safety, including through worker safety committees	No such safety committees in the factory.			Completed	The factory established a welfare committee to handle those issues.	Please refer to photos.		
7. Freedom of Association and Collective Bargaining										
Employers will recognize and respect the right of employees to freedom of association and collective bargaining										
Victimization		Employers and employees will honor in good faith, for the term of the agreement, the terms of any collective bargaining agreement they sign. Employees shall be able to raise issues regarding CAB compliance by the employer without retaliation	No such collective bargaining agreement was signed.			Completed	The factory has established an employee committee to negotiate on behalf of all workers.	Please refer to photos.		
Access to Unions		Trade unions not recognized as bargaining agent of some or all of the workers in a facility should have the means for defending the occupational interests of their members, including making representations on their behalf and representing them in cases of individual grievances, within limits established by applicable law. Workers' representatives should have the facilities necessary for the proper exercise of their functions, including access to workplaces	No workers' representatives existed in the factory.			Completed	The factory has established an employee committee to negotiate on behalf of all workers.	Please refer to photos.		
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										
Minimum Wage	The clause 48 of China Labor Law. The state shall implement the system of guaranteed minimum wages. The legal minimum wage in this region is RMB 330/ month for 20.92 days in average.	Employers will pay workers the legal minimum wage or the prevailing industry wage, whichever is higher	The minimum wage was RMB 300/ month for 31 days in probation period and RMB 330/ month for 31 days after probation period, less than the local legal minimum wage of RMB 330/ month for 20.92 days in average.			Completed	The factory adjusted salaries to meet the local labor code.		Owing to internal personnel change and difficulty in finding relevant personnel records, factory only starts new salary system and does not trace back to earlier dates on any payment related issues.	
Payment of Legal Benefits	The clause 70 and 72 of China Labor Law	Legally mandated benefits will be provided or paid in full within legally defined time periods	Records showed the factory only provided retirement, works injury insurance, unemployment insurance for 13 employees (supervisor and team leader), not for workers, and no medical insurance provided.			Completed	The committee has signed an insurance contract with an insurance agent for the workers of company		The insurance contract covers all workers in factory	
Illegal Holding of Funds		All voluntary deductions (savings clubs, loan payments, etc.) will be credited to proper accounts and funds will not be held illegally or inappropriately by employers.	Workers would be [docked] 1% of their salary as welfare fund, which was used for the welfare in the factory, such as birthday gifts, etc., but the factory did not make written agreement with workers, and could not provide relative usage records.			Completed	The employee welfare committee is handling this issue and will record all money spent.			
Legal Compliance for holiday/leave	The clause 40, 45, 51 & 62 of China Labor Law.	Workers will be paid for holidays and leave as required by law	The factory did not provide paid annual leave, statutory holidays and paid marriage & maternity leave for workers.			Completed	The factory has adjusted factory rules to provide for all mandated paid annual leaves.		Owing to internal personnel change and difficulty in finding relevant personnel records, factory only starts new salary system and does not trace back to earlier dates on any payment related issues.	

FLA Code/ Compliance issue	Findings					Remediation				
	Legal Reference	FLA Benchmark	Monitor's Findings	Documentation	Best Practice	Target Completion Date	Factory Response	PC follow up	Factory Follow UP 3/4/2004	Documentation
Record Maintenance	The clause 6 of Temporary Provisions on Wage Payment. Payroll records should be maintained for at least two years for review.	All legally required payroll documents, journals and reports will be available complete, accurate and up-to date. (In the United States terms this would include W-4s, I-9s, green cards, 941s and supporting material	The factory only provided payroll records from January to July of 2003, no previous records could be provided.			Completed	The factory keeps six month written records in the factory and sends previous records back to Taiwan headquarters. The factory is setting up a computer system so all records can be checked via computer (even the original documents kept in Taiwan).		Computer system has been set up and worked well since Nov. 2003	
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										
Forced overtime	The clause 13 of Provisions on Employee Labor Rights Protection in Guangdong Province. Over time should be voluntary.	Under extraordinary business circumstances, employers will make extensive efforts to secure voluntary overtime work prior to mandating involuntary overtime	Workers were required to work OT 3-5 hours a day except Sunday. Workers would [also] be fined RMB 25 if she/ he did not work OT, informing in advance and/ or without permission.			Completed	The factory adjusted its production schedule based on the legal workload for each worker. Going forward, every other week the manager of each department will review the order status and the OT records and make sure the working time and OT of each worker meets local labor laws. The factory is also applying for an OT permit from the local government.		1. In addition to adjusting production schedule regularly, factory also purchased a modern machine to increase production capacity and reduce the possibility of OT. 2. Any voluntary worker has signed a voluntary notice to their manager. When factory needs to arrange OT, they will call those workers who signed the form before they call other workers. 3. When OT arrangement is required, each manager will need to submit a OT application to top management and accounting dept to obtain approval and make sure OT time meets local labor law	
Overtime Limitations	The benchmark of FLA and the clause 36 & 41 of China Labor Law, the legal requirements was 40 normal work hours a week, 20.92 normal work days in average a month, max 3 OT hours a day, max 36 OT hours a month.	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	The normal work time in the factory was 29-30 days a month, only one day off allocated. Most workers worked OT 3-5 hours a day except Sunday, sometimes worked OT till next morning, about 74-90 work hours a week and 146-190 OT hours a month, max 220 OT hours a month. The factory did not guarantee workers at least one day off in every seven period.							
Legal compliance with protected workers	The Clause 41 of China Labor Law, the clause 28 of China Juvenile Person Protection Law.	The factory will comply with all applicable laws governing work hours, including those regulating or limiting the nature and volume of work performed by women or workers under the age of 18.	Some young workers [worked] OT [hours the] same as other workers, 3-5 OT hours a day, sometimes worked OT till next morning.							
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.										
OT Compensation		The factory shall comply with applicable law for premium rates for overtime compensation	The factory paid overtime payment RMB 1.3/ hour in probation period, RMB 1.8/ hour after probation period for all overtime work at night, no additional payment for daytime work on rest days & statutory holidays.			Completed	The factory has adjusted its OT compensation as below: 150% for OT on working days. 200% for OT on Sat. or Sun. and 300% for OT on Chinese holidays.		Owing to internal personnel change and difficulty in finding relevant personnel records, factory only starts new salary system and does not trace back to earlier dates on any payment related issues.	
Miscellaneous										