

The factual information set forth on the Tracking Charts was submitted to the FLA by each Independent External Monitor and Participating Company and reviewed by FLA staff. It is being made available to the public pursuant to the FLA Charter in order to strengthen the monitoring process. The FLA Charter provides for regular public disclosure of the factual results of independent monitoring and the resulting specific actions taken by Participating Companies.

What is a Tracking Chart?

Compliance is a process, not an event. A Tracking Chart outlines the process involved in FLA independent external monitoring and remediation. It is used by the accredited independent external monitor, the participating company and the FLA staff to do the following:

- **Record Findings:** The independent external monitor uses the Tracking Chart to report noncompliance with FLA Code standards. The monitor should also cite the specific Code benchmark or national/local law that was used to measure compliance.
- **Report on Remediation:** The FLA participating company uses the Tracking Chart to report on the remediation program that was implemented in order to resolve the noncompliance and prevent any future violations.
- **Evaluate Progress:** The FLA uses the Tracking Chart for purposes of collecting and analyzing information on the compliance situation of a particular factory and for publication on our website. This information is updated on an ongoing basis.

What a Tracking Chart is NOT -

- An exhaustive assessment of factory conditions

Working conditions - in any type of workplace - are dynamic. Each Tracking Chart represents a survey of the factory's conditions on a specific day. Over time, a fuller picture emerges as we compile information from various sources to track the compliance progress of a factory.

- A pass or fail evaluation

The Tracking Charts do not certify whether or not factories are in compliance with the FLA Code. Monitoring is a measurement tool. The discovery of noncompliance issues is therefore not an indication that the participating company should withdraw from a factory. Instead, the results of monitoring visits are used to prioritize capacity building activities that will lead to sustainable improvements in the factory's working conditions.

- A one-time event

Each monitoring visit is followed by a remediation program, further monitoring and remediation in an ongoing process. The Tracking Charts are updated accordingly.

Note on Language

Please be advised that because FLA independent external monitors are locally-based and English is generally not their native language, the language presented may at times appear unclear to a reader who is a native English speaker. In order to preserve the integrity of the transparency process and the information we receive, our policy is to publish the original text from the monitor and participating company. However, the reader will note that we have taken the precaution to remove any identifying information about the factory that was monitored or the workers interviewed.

For example, in cases where monitors and/or participating companies have cited the actual number of workers in reference to a noncompliance issue, in order to protect the workers' identities, we have replaced the numbers with generic wording in brackets (i.e. "[some]", "[worker interviews revealed that]", etc.).

We do not disclose the name of the factory that was monitored in order to ensure that the FLA's efforts to encourage and reward transparency do not have detrimental consequences for the factory and the workers.

Instructions for Printing

The information contained in the Tracking Charts is organized by columns and rows in a table format. Due to the number and width of the columns, the charts have been formatted for legal size (8.5 x 14in.) paper. To print the charts, please make sure to select "legal" size paper from Print properties.

FLA Audit Profile	
Country	Turkey
Factory name	40076412E
IEA	SC2
Date(s) in facility	10/11/2006
PC(s)	Asics, adidas Group, Patagonia
Number of workers	140
Product(s)	Seamless, intimate apparel, active, swim, maternity and yoga wear
Production processes	Cutting, embroidery, sewing, yarn cleaning, final control and packing

Company Comments: In 2006 adidas Group helped create and deliver a remediation plan to this factory in order to address the issues found during the original IEM visit. Shortly after the factory audit, this facility was deactivated by adidas Group's sourcing unit due to production related issues. As a result, the adidas Group's SEA Team was unable to ensure a successful completion of the remediation plan.

FLA Code Compliance Issue	Country/Law/Legal Reference	FLA Benchmark	Non-compliance	Risk of Non-compliance	IEM Findings				PC Remediation plan	Target Completion Date	Remediation		Documentation	(Status) Completed, Pending, On-going	Updates (Cite Date of Future use)	Documentation	(Status) Completed, Pending, On-going	Third Party Verification (Date)	Company Verification (Date)	Company Follow-up (Date of planned or follow up visit, if appropriate)	Documentation
					Evidence of Non-compliance (uncombarated)	If not combarated, explain why	Sources Documented used for Combaration	Notable Features implemented by Factory Management or Company			PC Internal audit findings (Optional)	Factory Response (Optional)									
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.	Asics manual was there but the code was not translated to Turkish and not posted.						ASICS and Patagonia will provide Code of Conduct posters in Turkish and will advise factory on locations to post.	25-May-07	The companies have been asked to send the posters.	Posters sent from ASICS and Patagonia.		On-going	1. Factory management must post copy of the contracts in areas that are visible to workers. 2. Factory management must also provide verbal training to all supervisors, managers, and workers on contents of the code. 3. Please ensure to maintain documentation of all trainings provided.		Ongoing				
Workermanagement 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.	Workers were not aware of the code and the Code was not posted at dyeing section [subcontractor company].						PCs will work with either a local staff member or third party to provide code explanation to management. Management will be asked to communicate to workers. ASICS will also ask factory to deliver to [giving subcontractor].	25-May-07	None of the brands told us that the [giving subcontractor] needs to have the same standards.		Ongoing	ASICS and adidas-group visited "Factory Name" for code explanation and CAP follow-up. 1. Factory management must be aware that adidas' workplace standards apply to adidas' entire supply chain, as a result, all subcontractors must be provided copy of all the codes of conduct, and with verbal training of such. 2. In addition, all workers in subcontractors' facilities must be verbally communicated contents of the code of conduct.		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 reprimanded for doing so.	There is no auditing system concerning subcontractors at the moment.			Though not posted, there is a disciplinary committee with a worker representative and workers know their rights. There are cases where workers placed complaints to Ministry of Labor.	There are suggestion boxes and also worker representatives which workers can communicate and inform management about their complaints.		1. Factory to make a list of all subcontractors and to ensure that all subcontractors are in compliance with local law by conducting periodic audits. 2. Results of all audits and remediation plan must be maintained in factory floor. PCs will determine a secure channel of communication so that a local company representative can receive complaints or suggestions from workers.	25-May-07	The PCs have been asked for the assigning of the communication channel.		6/18/2007 and ongoing	1A. Factory management must provide list of all subcontractors producing for any of the brands (Asics, Patagonia). B. Once subcontractors are disclosed, factory management must create a plan to monitor subcontractors to ensure that they are in compliance with local laws/PC's labor, HSE, and environmental standards. C. Copy of internal audit/inspection plans for subcontractors to be maintained by factory management. PCs met w/ a (local group) to assess if group would be appropriate for secure form of communication and training. It was determined afterwards that search will continue.		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.																					
Other			Age of worker verified mainly from the birth certificate. When recruiting a worker, some other official papers are necessary and age can be cross checked from these papers also.			It was said that there was company policy, no one hired less than 18 years old.		Factory to have a written minimum-age hiring policy. Policy will be communicated to all employees.	26-Feb-07	Polices already exist, training on the policies will be given.			On-going	A detailed training was given to all workers and mobile management on the hiring policy. Company Handbook was handed to PC's, the Company handbook was given to all employees. A Fire training, orientation training and PPE usage training is given to all employees on their first day. Chemical training was given by the company who provide the chemicals.		Completed					
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.																					
Other			Procedure is in accordance with Turkish law, but no written policy and declaration of it.					Factory to generate a written Harassment and Abuse Policy and to communicate to all employees, including supervisors, managers, and workers.	26-Feb-07	Polices already exist, training on the policies will be given.			On-going	A written Non-harassment policy was prepared with detailed procedures and an assigned person. And documented training was given to all employees including supervisors, managers, and workers about this policy.	The Non-harassment Policy and training documents were available.	Completed					
5. Non-discrimination																					
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.					Factory to generate a written policy on non-discrimination and communicate to all employees.	26-Feb-07	Polices already exist, training on the policies will be given.			On-going	A written non-discrimination policy was prepared with detailed procedures and an assigned person. And documented training was given to all employees including supervisors, managers, and workers about this policy.	The non-discrimination policy and training documents were available.	Completed					
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	At the cartoon box storage area, there was temporary steel profile cutting operation. Sparks were reaching to unprepared boxes and there wasn't a fire extinguisher nearby.	Picture of the area				Work stations should be assessed for risk and safety and a fire extinguisher mounted near the steel cutting operation or, factory will re-assess the proximity of the operators and make necessary changes to reduce the risk of fire.	Q2 2007	At the time of the audit, the factory was carrying out some internal removing/modifications within the building. The steel cutting operation was an extraordinary case. In the future, much more attention will be paid during such activities.			On-going								
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.	No PPE used by the workers performing temporary steel cutting at box storage area.	Picture of the area				Work stations should be assessed for risk and safety and PPE provided to all eligible workers.	Q2 2007	At the time of the audit, the factory was carrying out some internal removing/modifications within the building. The steel cutting operation was an extraordinary case. In the future, much more attention will be paid during such activities.			On-going	1. Factory management must ensure to complete risk and safety assessment to verify which operations require PPE. 2. Once it is determined which workers need PPE, factory management must ensure to provide required PPE to these workers. 3. Factory management must create, communicate and enforce a PPE Policy for workers who are required to work PPE, and conduct periodic checks to verify their proper use.		Ongoing					
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.																					
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 law 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																					

