

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	Bulgaria
Factory name	9100114096
IEA	Balkan Institute for Labour and Social Policy
Date(s) in facility	2-3 October 2006
PC(s)	Jordan-Group AG
Number of workers	1204
Production(s)	Socks, underwear, pantyhoses
Production process(es)	Socks: Sewing of socks toes, training, pairing, stamping, marking, Socking, expedition

FLA Code	Compliance Area	Country/Legal Reference	FLA Benchmark	Non-compliance	Risk of Non-compliance	Evidence of Non-compliance (noncorroborated)	Not corroborated, explain why	Source/Documentation used for corroborating	Notes/ Findings (reported by Factory Management)	PC Remediation plan	Target Completion Date	Remediation (Factory Response (Please))	Company follow up (December 2006)	Documentation	Compliance Pending On	Company Follow up	Updates (First June 2007)	Documentation	Compliance Pending On	Final Evaluation (Date)	Time/Priority Verification	Documentation	Company Follow up (Date of closure of follow up visit, if appropriate)	Documentation
1	Code Assessment																							
	Code postimplementation		FLA Principle of Monitoring, Obligation of Competence: Establish and articulate clear, written workplace standards. Formally convey those standards to Company facilities as well as to business, contractors and suppliers.																					
	Non-management representatives of Code		FLA Principle of Monitoring, Obligation of Competence: Ensure that all Company facilities as well as contractors and suppliers inform their employees about the workplace standards only and through the use of standards in a prominent place (in the local language spoken by employees and managers) and undertake other efforts to educate employees about the standards on a regular basis.																					
	Confidential non-compliance reporting channel		FLA Principle of Monitoring, Obligation of Competence: Design a secure communication channel to be used by the factory employees for reporting non-compliance. To ensure that Company employees are empowered to connect and suppliers to report to the Company on non-compliance with the workplace standards, with security that they shall not be punished or prejudiced for doing so.																					
	2. Sexual Labor																							
	Freedom of Movement		If factory entrances are locked or guarded to prevent non-employees from entering premises, employees will have free access at all times.																					
	Freedom of Movement	Labour Code, Art. 346 para 3	Employees are prohibited from practices that restrict a worker's ability to terminate his or her employment or otherwise restrict the worker's freedom of movement, including, but not limited to, unreasonable financial penalties or retention fees, and access to and renewal of identity papers and/or work permits or other legal identification documents.																					
	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 after employees have already earned, provided for penalties resulting in paying back wages already earned for, or in any way penalize 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.																					
	Other	Labour Code, Chapter 5, Art.62 para 1, Art.63 para 1 and 2	Worker shall have a copy of the signed employment contract.																					
	3. Child Labor																							
	Age Documentation		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 each age is higher than 15.																					
	Age Documentation		Employees will maintain proof of age documentation for all workers, such as a birth certificate, which verifies date of birth.																					
	Children on premises		Children under the legal minimum working age will not be allowed in the factory work area at any time, unless they are part of a guarded school group or other such organized event. Children must not ride parents in the factory production areas.																					
	Child compensation for juvenile workers	Labour Code, chapter 15, section 1 Regulation No.4187 on the jobs prohibited for persons between 15 and 18	Workers will comply with applicable laws that apply to juvenile workers, i.e., those between the minimum working age and the age of majority, including regulations relating to hiring, working conditions, types of work, hours of work, proof of age documentation, and overtime.																					
	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.																					
	Physical Abuse	Labour Code, Art. 127 para 2	Employees will not use physical discipline, including strikes (pickets or other forms of physical control) or threats of physical discipline.																					
	Sexual Harassment		Employees shall not offer preferential work assignments or other preferential treatment for any kind of actual or implied exchange for a sexual relationship, nor subject employees to prejudicial treatment of any kind in retaliation for refused sexual advances.																					
	Disciplinary Practices		Employees will utilize consistent written disciplinary practices that are applied fairly among all workers.																					
	Training of Management in Disciplinary Practices		Employees will provide training to managers and supervisors in appropriate disciplinary practices.																					
	Disciplinary Action	Labour Code, Art. 127 para 2	Management will discipline (which includes constraints of counseling, warnings, demotions, and demerits) anyone (including managers or fellow workers) who engages in any physical, sexual, psychological or verbal harassment or abuse.																					
	Verbal Abuse	Labour Code, Art. 127 para 2	A supervisor used rude language and abused workers.																					
	Monetary Fines and Penalties	Labour Code, Art. 272 para 1	Employees will not use monetary fines and penalties for poor performance.																					
	5. Non-discrimination																							
	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.																					

