

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	Indonesia
IEM	ITS
Factory Code	02003330A
Date of audit	15th & 16th August 2002
PC(s)	Eddie Bauer
Number of workers	1,600
Product(s)	Polo Shirt, Casual Shirt, T-shirt and Blouses for Men, Women and Children

FLA Code/ Compliance issue	Findings				Remediation		
	Legal Reference/FLA Benchmark	Monitor's Findings	Documentation	Best Practice	PC remediation plan	Completion Date	Documentation
1. Code Awareness							
2. Forced Labor							
3. Child Labor							
4. Harassment or Abuse							
Physical abuse	In accordance with the law no. 25/1997 chapter VII, article 108 : Every employees has the right to protect themselves from Physical and verbal abuse. Per FLA Benchmarks IIIB, Harassment and Abuse: 1. Employers will utilize progressive discipline, e.g., escalating discipline using steps such as verbal warning, written warning, suspension, termination. Any exceptions to this rule, e.g., immediate termination for theft or assault, shall be in writing and clearly communicated to workers.2. Employers will not use physical discipline, including slaps, pushes or other forms of physical contact (or threats of physical discipline).	Worker interviews revealed that physical abuse has occurred at the factory.	No document was available for review.		IAll disciplinary actions taken against employees should follow set rules and policies at the factory. Factory management needs to train all factory supervisors to ensure that they are fully aware of rules and regulations regarding abuse, harassment and discipline employees. Participating Company communicated to corrective action to factory on September 13, 2002.	Factory management needs to immediately implement corrective action. The practice of verbally abusing employees needs to be discontinued. All training of supervisors to be completed by January 31, 2003.	In a letter to Participating Company dated January 2003 the factory management reported that they had spoken to all line supervisors to ensure that events like the one reported by employee did not occur in the future. In the letter the factory described the event that occurred stating that the employee was being sent over to the office for remediation training and the employee was asked to wait for the manager to become available to discuss the employee's mistake.
Verbal Abuse	In accordance with the law no. 25/1997 chapter VII, article 108 : Every employee has the right to protect themselves from Physical and verbal abuse. Per FLA Benchmarks IIIB: 1. Employers will utilize progressive discipline, e.g., escalating discipline using steps such as verbal warning, written warning, suspension, termination. Any exceptions to this rule, e.g., immediate termination for theft or assault, shall be in writing and clearly communicated to workers. 3. Employers will prohibit screaming, threatening, or demeaning verbal language.	It was noted that [some] workers reported they had been verbally abused by their supervisor in the production area with using word Stupid and Monkey.	No document was available for review.		Immediately discontinue practice of verbally abusing employees. All disciplinary actions taken against employees should follow set rules and policies at the factory. Factory management needs to train all factory supervisors to ensure that they are fully aware of rules and regulations regarding abuse, harassment and discipline of employees. Participating Company communicated to factory on September 13, 2002.	Factory management needs to immediately implement corrective action. All training of supervisors to be completed by January 31, 2003.	In a letter to Participating Company factory management reported that they had spoken to all line supervisors to ensure that employees are treated appropriately in the future. The factory has established clear policies to ensure that if any supervisor violates company policy they will be appropriately reprimanded. Draft of policies submitted to PC for review after approval the factory conducted the training and implemented the policies on October 2002
5. Nondiscrimination							

FLA Code/ Compliance issue	Findings				Remediation		
	Legal Reference/FLA Benchmark	Monitor's Findings	Documentation	Best Practice	PC remediation plan	Completion Date	Documentation
Hours of work	In accordance with Per-04/MEN/1989, Article 2.1 : Entrepreneur who employs a worker woman at night time (night time means 6pm - 6am) should keep safety ,health and morality and the worker is not in a pregnancy condition. Per FLA Benchmarks IVB, Harassment and Abuse: 1. Reasonable accommodation will be made in the event of pregnancy, in a manner that will not unreasonably disadvantage the pregnant woman. 2. Employers will ensure that pregnant women are not engaged in work that creates substantial risk to the health of the pregnant woman.	It was noted during workers interview and records review that [some of the] selected workers who is in pregnancy condition had worked at night time i.e. up to 9pm.	12 months' (from August 2001 to July 2002) time cards were reviewed.		Immediately discontinue practice of female employees working between 6PM and 6AM.	Practice has been discontinued. Factory reported to PC in a letter. The factory also provided copies of September 2002 payroll and time records on October 7, 2002	Documentation mailed to PC of time records and payroll .
6. Health and Safety							
Fire Safety	In accordance with Law No. 1 of 1970 , Chapter III , Article 3.b : Safety condition shall be prescribed by legislative regulation to prevent and reduce the possibility of an extinguish fires. Per FLA Benchmarks VB, Health and Safety: 1. 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. 2. 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.	It was noted during factory tour that one fire extinguisher in the sample room and maintenance room was already expired .	No document was available for review.		Ensure that all fire extinguishers are properly maintained at all times. September 30, 2002	Factory completed corrective action on September 27, 2002.	Documentation copies were e-mailed to PC of new fire extinguisher log check sheet.
	In accordance with The Regulation of The Minister of Labor No. 7 of 1964, Article 13.4 : Exits such as doors, corridors, etc must be provided with emergency lighting equipment and the sign, painted with luminous,reflecting or fluorescent material. Per FLA Benchmarks VB: 1. 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. 2. 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.	It was noted during factory tour that one emergency exit was not provided with emergency lights in the warehouse.	No document was available for review.		Install emergency lights in the warehouse by September 30, 2002	Factory completed corrective action on September 27, 2002 and submitted photos to Participating Company.	Photos documenting new lights submitted to PC.
Machine Guarding	In accordance with Law No. 1 / 1970 , Chapter III, Article 3.a : Safety condition shall be prescribed by legislative regulation to prevent and reduce the possibility of accident. Per FLA Benchmark VB, Health and Safety: 1. All production machinery and equipment shall be maintained, properly guarded, and operated in a safe manner.	It was noted during factory tour that 90% of sewing machines were without finger-guards and 10% of it were without belt-covers ; 10% of overlock machines were without eye-guards ; 80% of bartack machines were without finger-guards and eye-guards.	No document was available for review.		Install all appropriate safety mechanisms in sewing machines as required by law. September 30, 2002	The factory reported in January 2003 that they were 70 % completed with the installation of safety mechanism on sewing machines. The factory stated that they have had difficulty achieving completion because employees would removed safety devices in order to work more efficiently.	Unable to verify completion of corrective action due to inactive relationship with vendor.

FLA Code/ Compliance issue	Findings				Remediation		
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Canteen	In accordance with KEPMEN/SE-01/MEN/1979 : All company whom employs more than 200 workers obligated to provide canteen facility. Per FLA Benchmark VB, Health and Safety: 1. 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. 2. All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with applicable laws.	It was noted during factory tour that no canteen facility was found available in the factory	No document was available for review.		Ensure that employees have a designated canteen that protects from the weather elements. By January 31, 2003	Pending construction.	Unable to verify completion of corrective action due to inactive relationship with vendor.
Restrooms	In accordance with The Regulation of The Minister of The Labor No. 7 of 1964, Article 6.6 : The scale of the lavatories shall be every 100 workers : 6 lavatories. It was noted during factory tour that insufficient number of lavatories was found. Per FLA Benchmarks VB, Health and Safety. 1. 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. 2. All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with applicable laws.	There were only 64 lavatories provided for workers. It should be 99 lavatories for the number workers employed.	No document was available for review.		Ensure that the facility has the appropriate number of restrooms as required by law. January 31, 2003	In January 2003 the factory reported that the construction was still on going. The factory has had issues securing legally required construction permits for the government. The factory reported that this was in addition to a larger construction project that the company is undertaking to consolidate factory locations.	Unable to verify completion of corrective action due to inactive relationship with vendor.
Other	In accordance with Regulation of the Minister of Labor No. 7 / 1964,Article 7.6 : Lockers shall be provided on a scale of one for each worker. Per FLA Benchmarks VB, Health and Safety. 1. 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. 2. All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with applicable laws.	It was noted during factory tour that insufficient number of lockers was found. There were only approximately 816 lockers available. Currently the factory provide lockers facilities on a scale of one locker for 2 to 3 workers.	No document was available for review.		Ensure that lockers are provided to all employees as required by law. January 31, 2003	In January 2003 the factory reported that the construction was still on going. The factory has had issues securing legally required construction permits for the government. The factory reported that this was in addition to a larger construction project that the company is undertaking to consolidate factory locations.	Unable to verify completion of corrective action due to inactive relationship with vendor.
Other	In accordance with The Regulation of The Minister of Labor No. 7 of 1964,Article 9.2.d : Employees who work seated shall be provided with seating facilities which have backrest for support. Per FLA Benchmark VB, Health and Safety: 1. 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.	It was noted during factory tour that all seating facilities in the production area were without backrest for support	No document was available for review.		Install backrests on all factory chairs. September 30, 2002	The factory completed corrective action on September 27, 2002 all chairs have had backrest placed.	Photos submitted to PC via e-mail.
7. Freedom of Association and Collective Bargaining							

FLA Code/ Compliance issue	Findings				Remediation		
	Legal Reference/FLA Benchmark	Monitor's Findings	Documentation	Best Practice	PC remediation plan	Completion Date	Documentation
8. Wages and Benefits							
Social Security	Per FLA Code Provision: 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. Per FLA Benchmark VIIB: 1. Employers will provide all legally mandated benefits to all eligible workers.			All workers were covered with Social Security Scheme.			
Wages	Per FLA Code Provision: 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. Per FLA Benchmarks VIIB: 1. The factory shall comply with applicable law for premium rates for overtime compensation.			Basic wages and overtime payment had been properly calculated according to the government regulation and were paid to workers regularly without delay.			
9. Hours of Work							
Overtime	In accordance with SK No.62 / 32210 / JU / 2001 : Working hour shall not exceed 12 hours/day and 72 hours/week. Per FLA Benchmark VIIB, Hours of Work: 1. 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.	It was noted during records review that [some of the] selected workers had worked more than 12 hours/day in April, May and July 2002	12 months' (from August 2001 to July 2002) time cards were reviewed.		Ensure that all employees do not exceed overtime code of conduct requirements immediately and Continuously	Factory reported that they are trying to reduce overtime, however due to peak production they have had difficulty complying with requirements.	PC to continue monitoring
Rest Time	In accordance with SK No. 62 / 32210 / JU / 2001 : After having performed work for 4 successive hours, a rest time of at least half an hour shall be granted. Per FLA Benchmark VIIB, Hours of Work: 1. Employers will ensure reasonable meal and rest breaks, which, at a minimum, must comply with local laws.	It was noted during records review that workers were entitled to have the rest time after performing work for 4.5 hours ie. From 7.30am to 12pm	12 months' (from August 2001 to July 2002) time cards were reviewed.		Immediately and continuously ensure that all employees receive the appropriate rest time as required by law.	Factory reported that they are now providing all required rest breaks as per law.	PC to continue monitoring

FLA Code/ Compliance issue	Findings				Remediation		
	Legal Reference/FLA Benchmark	Monitor's Findings	Documentation	Best Practice	PC remediation plan	Completion Date	Documentation
Monthly Report	In accordance with SK No.62 / 32210 / JU / 2001 : On 10th of each month, factory should submit monthly report regarding overtime hour to Department of Labor (Depnaker). Per FLA Benchmark VIIIB, Hours of Work: 1. All legally required payroll documents, journals and reports will be available complete, accurate and up-to date.	It was noted during records review that the factory did not submit the monthly report to Department of Labor (Depnaker)	No document was available for review.		Ensure that factory submits monthly report to the Department of Labor on a monthly basis as required by law.	Factory submitted report to Department of Labor for October 2002.	Department of Labor report provided to Participating Company.
10. Overtime Compensation							