

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.

Country	India	Factory Profile	
IEM	MTL	# of workers	1300
Factory Code	11023223A	Product	wovens
Date of Audit	2/21/02		
Duration of IEM Evaluation	2 Days		
Announced/unannounced	Unannounced		
PC(s)	Levi Strauss & Co.		

FLA Code/Non compliance issue	Findings			Remediation			Remediation Updates
	FLA Tracking Chart	Monitor's Findings	Best Practice	Remediation by PC	Due Date	Completion Date	PC Follow up (Feb. 2003)
1. Code Awareness							
Training/Posting	Per FLA Principles of Monitoring, Obligations of Companies: I.B. Create an Informed Workplace. 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.	NO CODE TRAINING TO EMPLOYEES AND MANAGEMENT. CODE NOT DISPLAYED IN ALL THE FACTORY AREAS IN LOCAL LANGUAGE.		LS&Co TOE posters in English and Tamil displayed in all the areas in factory. PC operating guidelines must be posted in accessible visible areas where workers have access. Factory will ensure that a training session on the LS&CO. and PC codes of conduct are done for all workers through the supervisors	5th Apr 02.	4/5/2002, 11/10/02	Posters are up in English and Tamil. Training is happening for all employees in groups and will be completed by 20th April. This was verified via visual observation and management interviews, conducted November 10, 2002. This will be checked during regular audits. WILL VERIFY THROUGH UNANNOUNCED OUTSIDE FOLLOW UP AUDIT.
2. Forced Labor							
Policy on Forced Labor		NO WRITTEN POLICY EXISTS		LS&Co TOE posters in English and Tamil displayed in all the areas in factory. PC operating guidelines must be posted in accessible visible areas where workers have access. Factory will ensure that a training session on the LS&CO. and PC codes of conduct are done for all workers through the supervisors. By Indian law any form of forced labor is deemed illegal and prohibited. The LS&CO. and PC codes of conduct cover this. The contractor is to review all employee files, identify and provide appointment orders, for those workers who do not have this as yet. Workers should acknowledge receipt of this order. All workers to be issues appointment orders on the date of joining work.	5-Apr-02	4/5/01, 11/10/02	As stated above, the LS&CO. and PC codes of conduct are posted in the factory in Tamil and English. This was verified via visual observation. File maintenance has improved, and a copy of the order is now being given to all the workers. All but the last set of people recruited, have been given appointment orders. This was taken up with the factory management, and they have committed to remediating this issue. WILL VERIFY THROUGH UNANNOUNCED OUTSIDE FOLLOW UP AUDIT.
Contracts	Per FLA Workplace Code Provision and Benchmarks, I. Forced Labor, B.5. Employer will maintain sufficient hiring and employment records to demonstrate and verify compliance with this Code Provision.	NO APPOINTMENT LETTERS ISSUED TO EMPLOYEES.		All the workers are aware of the working terms , but has been done orally only. The site will issue appointment orders to all employees and get their signatures on the copies which will be in their personal files	30th Apr 02	5-Apr-02	Appointment orders are issued to all employees, and signed copies are retained in the employees' files. A copy of the order is now being given to all the workers. This was verified via visual observation. WILL VERIFY THROUGH UNANNOUNCED OUTSIDE FOLLOW UP AUDIT.
3. Child Labor							
Policy on Child Labor		NO WRITTEN POLICY EXISTS		The minimum age for recruitment is 16 years. Currently factory is obtaining proof of age documents for employees who physically look young and are in the age group between 16 and 18 which is still legally correct. But site will get proof of age for all employees and document in the personal file. The proof of age document shall be either school certificate or copy of birth certificate or a certificate from a government surgeon. Also establish a policy document spelling out the minimum age as a policy for the company	30 th Mar 02	4/5/2002, 11/10/02	Proof of age is available for all workers either by way of school certificates or certificate from a doctor, and no worker under 16 years of age is working in the factory. The recruitment policy in the factory was established by the HR department. This was verified via inspection of records. Additional verification was carried out on Novemeber 10, 2002 and the factory was in compliance. WILL VERIFY THROUGH UNANNOUNCED OUTSIDE FOLLOW UP AUDIT.

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4. Harassment or Abuse							
Policy & Grievance Procedure		NO WRITTEN POLICY EXISTS		The factory should proactively communicate with all supervisors and managers to reinforce that these types of actions are not acceptable. Also, supervisors and managers should have an orientation program on the company disciplinary process and how they should treat workers. Disciplinary practice (as part of the company's standing orders) should be posted for workers to see. A clear grievance procedure should be set up and workers should be properly informed about the process.	30th Apr 02	4/5/02, 11/10/02	The training, as mentioned earlier, covers this and will be completed by 22nd april. Suggestion boxes have been installed at various places in all departments, with privacy ensured for workers making their suggestions. The factory will maintain files of suggestions received and action taken. This will be followed during regular audits. Verification measures included visual observation and management interviews. WILL VERIFY THROUGH UNANNOUNCED OUTSIDE FOLLOW UP AUDIT.
5. Nondiscrimination							
Policy		NO WRITTEN POLICY EXISTS		As part of the company's standing orders, this should be clearly listed and all supervisors and managers trained on this.	15th Apr 02	4/5/02, 11/10/02	The participating company required that the factory gain approval from the inspector of factories, which was to be obtained by 25th April. A copy of the standing orders was available, and is in the documentation files maintained by the participating company. It is currently pending with the labor department for approval, the standing order was referred by the labor inspector to elected representatives from the workers, and it is now pending the final signature from the labor department. WILL VERIFY THROUGH UNANNOUNCED OUTSIDE FOLLOW UP AUDIT.
6. Health & Safety							
Fire Safety							
Fire Extinguishers	Per FLA Benchmarks V, Health and Safety: B.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. 4. 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.	SOME FIRE EXTINGUISHER WERE DUMPED AND ON THE FLOOR.		All fire extinguishers mounted on the wall and empty extinguishers removed.	5-Apr	5-Apr-02	All extinguishers in place verified via visual observation. Extinguisher training conducted 26 March 01. There are 15 people trained on usage of extinguishers. WILL VERIFY THROUGH UNANNOUNCED OUTSIDE FOLLOW UP AUDIT.
Evacuation Route	Per FLA Benchmarks V, Health and Safety: B. 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. 3. 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. 14. Workers should be involved in planning for safety, including through worker safety committees.	NO FIRE HEALTH AND SAFETY AND EVACUATION TRAINING WAS PROVIDED PERIODICALLY		The annual drill is conducted and in future a proper document of evacuation time, head counts and assembly area will be kept and in case of any deviations a multi cause analysis will be done to resolve gaps.	4/5/02	5-Apr-02	Evacuation map has been displayed in the site and drill conducted on 14 March 2002 with all employees. Maximum time for employees to reach the assembly point was 3 minutes. Verified via photographs. COMPLETED.
Sanitation/Canteen							

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	Per FLA Benchmarks V, Health and Safety: B.11. All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with applicable laws. 12. All food preparation shall be prepared, stored, and served in a sanitary manner in accordance with applicable laws. Safe drinking water should be available in each building.	THE LID OF DRINKING WATER USED BY EMPLOYEES WAS OPENED		This will be kept closed	5-Apr-02	5-Apr-02	Lid is closed verified via visual observation. COMPLETED.
Canteen	Per FLA Benchmarks V, Health and Safety: B.11. All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with applicable laws.	FEMALE CANTEEN WAS OVERCROWDED.		Shifts for using canteen must be kept separated, so sufficient room is available. The ladies canteen has a seating capacity of 685. The men's canteen has a capacity of 170. There are 1200 ladies and they use the canteen in two batches of 600 each and rarely is the attendance 100% and the same is the case for the male canteen. Otherwise the canteen has got ventilation, light and drinking water.	5-Apr-02	5-Apr-02	Sufficient space available and people go for lunch in two batches. Verified via visual observation. COMPLETED.
7. Freedom of Association/Collective Bargaining							
Policy		NO WRITTEN POLICY EXISTS		The LS&Co TOE poster spells this out and the company follows this as the policy. The poster is already displayed	Done	4/5/2002, 11/10/02	Poster is posted in factory verified via visual observation. COMPLETED.
8. Wages and Benefits							
9. Working Hours							
OT	Per FLA Benchmarks VII, Hours of Work: B.28. 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. 32. 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.	IN THE CASE WHEN WORK IS DONE BY AN EMPLOYEE ON WORKING DAY OFF ,NO LEAVE IS GIVEN BEFORE NEXT WORKING OFF.		As per the OT act, if the OT wages of double the wages is paid, off is not required, provided the overall OT hours doesn't exceed the norm. But it is LS&CO policy that workers should have one day off in seven. Supervisors need to be educated on this policy	Ongoing	4/5/02, 11/10/02	Factory will need to be educated on the brands' policies and supervisors will need to be educated. Further verification to review records will be conducted. WILL VERIFY THROUGH UNANNOUNCED OUTSIDE FOLLOW UP AUDIT.
	Per FLA Benchmarks VII, Hours of Work: B.27. Employer personnel practices will demonstrate an effort to maintain a level of staffing that is reasonable in view of predictable or continuing fluctuations in business demand. 31. Employers shall be able to provide explanation for all periods when the extraordinary business circumstances exception has been used. Employers shall take reasonable steps to inform workers about the nature and expected duration of the circumstances. 39. Overtime hours worked in excess of code standard will be voluntary.	IN SOME CASES WORKERS ARE GIVEN VERY LITTLE NOTICE BEFORE OVERTIME WORK.		During shipping days, such exigencies happen, but the site will try to plan its operation better and avoid this. But for all OT done, payment is done per the law.	Ongoing	4/5/02, 11/10/02	This will be an ongoing improvement working with factory and supply chain of both companies. Advanced notice of overtime work is given to the workers in advance during the previous day. WILL VERIFY THROUGH UNANNOUNCED OUTSIDE FOLLOW UP AUDIT.
10. Overtime Compensation							