

*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.

<b>FLA Audit Profile</b>	
<b>Country</b>	Bangladesh
<b>Factory name</b>	12005081 D
<b>IEM</b>	LIFT Standards Ltd.
<b>Date(s) in facility</b>	November 30 and December 4 & 6, 2005
<b>PC(s)</b>	Reebok International, Ltd.
<b>Number of workers</b>	1404
<b>Product(s)</b>	Knitting
<b>Production processes</b>	Knitting, linking, stitching, mending, washing and finishing

FLA Code/Compliance Issue	Country Law/Legal Reference	FLA Benchmark	IEM FINDINGS						REMEDIATION				(STATUS)	UPDATE			(STATUS)	
			Non-compliance	Risk of Non-compliance	Evidence of Non-compliance (Uncontested)	If Not Contested, Explain Why	Sources/Documentation Used for Corroborating	Notable Features Implemented by Factory Management or Company	PC Remediation Plan	Target Completion Date	Factory Response (Optional)	Company Follow-up (March 1, 2006 and April 1, 2006)		Documentation	Completed, Pending, Ongoing	Company Follow-up Update (November 23, 2006)		Company Update (December 2006)
<b>I. Code Awareness</b>																		
Code Posting/Information		<b>FLA Principle of Monitoring, Obligation of Companies:</b> Establish an articulate clear, written workplace standards. Formally convey those standards to Company factories as well as to licensees, contractors and suppliers.						Sufficient CoC posted in common place in the factory.										
Workers/Management Awareness of Code		<b>FLA Principle of Monitoring, Obligation of Companies:</b> 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 language spoken by employees and managers) and undertake other efforts to educate employees about the standards on a regular basis.						Regular workers' training (near and on-going workers) conducted by the factory.										
Confidential Non-compliance Reporting Channel		<b>FLA Principle of Monitoring, Obligation of Companies:</b> 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 non-compliance with the workplace standards, with security that they shall not be punished or prejudiced for doing so.	There is no confidential non-compliance reporting channel established in the factory.					Worker interview, management interview and documentation check.	Factory to establish confidential reporting channel for workers to report challenges.	5/15/2006		Note: Reebok provides a confidential reporting channel directly to our monitors. Codes of Conduct posted in the factory contain PC's field monitor contact information.		Completed	The factory has installed compliance/suggestion box inside every locker areas to enhance secure communication between management and workers, and has submitted a photograph from March 2006 of suggestion box. This item is stated in point 3 of the revised SOP that was signed and came into effect in March 2006.	Scanned document in place for checking.		Completed
Confidential Non-compliance Reporting Channel	Employment of Labor (Standing Orders) Act, 1965, Sec-17-3(d).	<b>FLA Principle of Monitoring, Obligation of Companies:</b> 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 non-compliance with the workplace standards, with security that they shall not be punished or prejudiced for doing so.		Workers are not aware about the purpose, procedure and effectiveness of the suggestion box. There is no recording system or register opened to write the complaints from the workers.				Management and workers interview and documents review. Factory initiated training registered letters for long absence workers (more than 10 days lost of her) but it is not fully functional yet.	Factory should communicate to workers about purpose of suggestion boxes and factory's processing of information received from workers. 2. Factory is urged to advise date of regularization of issuance of registered letters to absentee workers as a matter of course.	4/30/2006	March 23, 2006: "Effectiveness of suggestion box is included in the training schedule." [Training schedule enclosed]	Mar 23, 2006: Factory has outlined process for addressing inputs received in suggestion boxes and a listing of trainees from orientation session about suggestion box conducted on Mar 1, 2006.	Copy of policy and training schedule.	Pending	The factory has provided orientation training to 1286 workers including 275 supervisors, officers, and managers. Factory management has submitted to PC monthly training schedule and copy of grievances received from March 2006 to November 2006. Factory has approximately 2000 employees and is conducting ongoing training through PA system on a continuous basis.	Document in place for checking.		On-going
<b>II. Forced Labor</b>																		
There will not be any use of forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise.																		
Employment Records		Employers will maintain sufficient hiring and employment records to demonstrate and verify compliance with this Code provision.	Workers do not receive appointment letter.		Instead of a copy of appointment letter for the probation period only confirmation letter is given to the workers.			Documentation review and worker and management interview.	Sufficient employment records are maintained in the personnel files of employees.	Factory must provide appointment letter to workers upon recruitment.	3/30/2006	March 23, 2006: "We are issuing appointment letter for the probation period within three days of going by fulfilling normal official procedures." [Copies enclosed]	March 23, 2006: Factory has submitted temporary appointment letters from Dec. 2005 and Jan. 2006.					On-going
<b>III. Child Labor</b>																		
No person will be employed as 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.																		
Childcare Facilities		The child care shall be conveniently accessible to the mothers of the children accommodated therein and as far as is reasonably practicable it shall not be situated in close proximity to any part of the factory where obnoxious fumes, dust or odors are given off or in which excessively noisy processes are carried on. The Factory Rules, 1979, section-64.	Childcare facilities will not physically overlap with production areas, and children will not have access to production areas.					Visual observation and interview with workers.	Functional childcare facility with 10 to 15 children and 2 caretakers employed. Mothers are allowed to visit them during working hour.									
<b>IV. Harassment or Abuse</b>																		
Every employee will be treated with respect and dignity. No employee will be subject to any physical, sexual, psychological or verbal harassment or abuse.																		
Disciplinary Practices	Procedure of punishment: 1. No order to discharge or dismissal of a worker shall be made unless, (a) The allegations against [worker] is recorded in writing, (b) [Worker] is given a copy thereof and not less than three days time to explain, (c) [Worker] is given a personal hearing if such a request is made, (d) The employer or the manager approves of such order. The employment labor law (Standing orders) Act, 1965, Section-18.	Employers will utilize consistent written disciplinary practices that are applied fairly and procedurally exists in the factory.	No written disciplinary system policy and procedure exists in the factory.		No case of termination and separation was found. Only the show cause notice were found in the relevant personnel files. Separated employees have either resigned or left the factory without further notice.			Management interview and documentation check.	Factory should adopt and post on notice board disciplinary policy, procedures and disciplinary measures for different kinds of infractions, including zero tolerance infractions that will result in a termination.	4/30/2006	March 23, 2006: "We are having Policy of Disciplinary action which is in compliance with the local law." [Copy of policy enclosed]	April 1, 2006: Factory has outlined its disciplinary process. Factory has been requested to revise the company disciplinary policy and list of disciplinary measures for different kinds of infractions.	Copy of policy.	Completed	The factory has submitted a copy of the harassment policy and has conducted training on the disciplinary procedures for 275 supervisors and managers and 1286 employees from June 2006 to November 2006. All training will be completed by March 2007.	Training document in place for checking.		On-going
Training of Management in Disciplinary Practices		Employers will provide training to managers and supervisors in appropriate disciplinary practices.	The floor level management is not trained on disciplinary practices as this topic is missing in the factory policy and the training program.					Management interview and documentation check.	Factory should incorporate in training sessions for its staff its policy on disciplinary measures and harassment and abuse.	4/30/2006		April 1, 2006: Factory is requested to submit record of training conducted on harassment policy for its staff.		Pending	The factory management has conducted training on disciplinary procedures for 275 supervisors and managers and 1286 employees from June 2006 to November 2006. All training will be completed by March 2007.	Document in place for checking.		On-going
Verbal Abuse		Employers will prohibit screaming, threatening, or demeaning verbal language.	Case of verbal abuse was identified with the cleaners.					Onsite and offsite Interview and visual observation.	Factory should investigate incident reported and hold those who use verbal harassment accountable. Factory should develop and communicate to employees its policy on harassment.	4/30/2006	March 23, 2006: "Harassment and abuse is totally prohibited in our factory also we are maintaining a policy. It is in fact depends on the perception of the people. Some workers talked in such way seems they are doing square." [Copy of policy enclosed]	April 1, 2006: Factory is advised to submit its findings on reported harassment against cleaners and any remediation implemented. Factory policy has submitted copy of its harassment policy.	Copy of harassment	Pending	All cleaners are trained on grievance system and will aware of this policy. The factory has submitted training records as well in addition, factory management and other staff have been trained, and will continue to be trained on harassment and abuse policy and disciplinary procedures.	Document in place for checking.		Completed
<b>V. Nondiscrimination</b>																		
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								Documentation review and worker interview.	All the workers (who are entitled for maternity benefits) are provided with full maternity benefits (leave and payment).									

FLA Code/Compliance Issue	County Law/Regulation	FLA Benchmark	IEM FINDINGS				Sources/Documentation Used for Corroborating	Notable Features Implemented by Factory Management of Company	REMEDATION			Documentation	[STATUS] Complete/ Pending/ On- going	UPDATE		[STATUS] Complete/ Pending/ On- going	
			Non-compliance	Risk of Non-compliance	Evidence of Non-compliance (Uncontroverted)	If Not Controverted, Explain Why			PC Remediation Plan	Target Completion Date	Factory Response (Optional)			Company Follow-up (March 1, 2006 and April 1, 2006)	Company Follow-up Update (November 23, 2006)		Company Update (December 2006)
<b>Health and Safety</b>																	
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.																	
Ventilation/Electrical/Facility Maintenance	1. One fourth of the total employee will be effectively trained on firefighting equipment; 2. First aid boxes. One for every 150 workers; 3. 1500 or more workers are employed, there shall be provided and maintained an ambulance room or dispensary of the prescribed size containing the prescribed equipment or similar facilities, in the charge of such medical & nursing staff as may be prescribed. (The Factories Act-1966, Section-44)	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.	Not all emergency lights are operational.	Firefighters training might not reach the required number of workers.	3 emergency exit lights at the main gate of each floor (2nd, 3rd and 4th floor) were found out. Standing workers need to be provided floor mats.	Only a list of 36 trained firefighters could be shown to the monitor, which is less than the required number.	Documents review and visual observation and worker interview.	Firefighters who received training and aware of responsibility and wear their identification, so workers can identify the firefighters. Full-time doctor along with the nurse is employed in the factory with good medical facility.	1. Factory must ensure that emergency lights are functional at all times; 2. Factory management to assign responsibility to responsible staff member for conducting regular check of electrical appliances - particularly during the evacuation drills; 3. If any emergency lights are found to not be working properly, management must repair or replace and lights with functional ones; 4. Standing workers need to be provided floor mats; 5. Factory is requested to admit list of trained firefighters together with training/orientation plan for regular workers.	4/30/2006	March 23, 2006: "We installed full time power supply in our 3rd emergency exit as well" (Photograph remain functional. 4. Factory is requested to submit photograph of floor mats will be replaced within next of next month (April)."	April 1, 2006: 2. Factory is requested to send name and designation of responsible staff member designated to ensure all emergency lights remain functional. 4. Factory is requested to submit photograph of emergency exit light.	Photograph	Pending	2. Factory has assigned the technician department to be responsible for the maintenance of the emergency lighting system; 3. & 4. The pictures of functional emergency exit light and floor mats have been submitted and have been maintained from March 2006; 5. Factory management has trained approximately 351 workers on fire emergency. In addition, the supplier has 1500 workers trained on the safety. Training is also on going process and training documentation is kept in files.	Documents/Photograph	1, 5. Completed
Document Maintenance/Accessibility		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.	MSDS not at all relevant sites posted.				MSDS in washing and dyeing sections missing.		Factory should ensure MSDS is properly labeled and posted.	3/31/2006	March 23, 2006: "We are not using any chemical in our factory..." (Factory) is having MSDS for all chemical." (Photograph enclosed)	March 23, 2006: Observation from IEM appears to have been for (factory) - an independently run wettest factory located within the same premises and not subject to this audit. Nevertheless, the factory management provided and submitted photograph from its sister concern showing MSDS listed above chemical containers.	Photograph	Pending	The factory has submitted the chemical list, MSDS in local language, posted photographs in the areas where chemical are being used.		Completed
PPE		Workers shall wear appropriate protective equipment (such as gloves, eye protection, hearing protection, respiratory protection, etc.) to prevent unsafe exposures (such as vibration or contact with solvents, pesticides, dust, etc.) to hazardous elements including medical waste.	PPE partly used.	Ear muff is not used in the area of high level sound noise like that knitting section. Metal gloves are not used in the cutting section. Mask and safety goggles are not using in the chemical section.		Observation			Factory must provide appropriate PPE to workers for protection. It should issue reminders to all supervisory staff to ensure that PPE is used.	4/30/2006		March 23, 2006: Except for observation on cutting section, the findings appear to be from adjacent wettest unit belonging to the group, which is not within the purview of the IEM. Factory has, however, submitted photographs from cutting sections of its own facility as well as from the independent facilities and showing PPE in use. April 1, 2006: Factory is advised to submit copy of instructions to floor supervisors to ensure PPE use.	Photographs	Pending	1. The factory has submitted photographs from cutting section and its own facility as well as the independent textile unit showing proper PPE in use. Factory management must continue to ensure that all workers (including workers in textile mills) are provided with required PPE; 2. The factory has provided periodic check results and training records for ensuring the proper use of PPE. The factory also submitted a copy of instruction to floor supervisor to ensure PPE is used by the workers.	Document and photographs are in place for checking	Completed and ongoing
Chemical Management		All chemicals and hazardous substances should be properly labeled and stored in accordance with applicable laws. Workers should receive training, appropriate to their job responsibilities, in the safe use of chemicals and other hazardous substances.	Chemical partly labeled (MSDS missing) and training irregular.	Thinner is used without eye goggles and labeling.		Observation			Factory should ensure MSDS is properly labeled and posted.	3/31/2006	March 23, 2006: "We are not using any chemical in our factory..." (Factory) is having MSDS for all chemical." (Photograph enclosed)	March 23, 2006: Observation from IEM appears to have been for (factory) - an independently run wettest factory located within the same premises and not subject to this audit. Nevertheless, the factory management provided and submitted photograph from its sister concern showing MSDS listed above chemical containers.	Photographs	Pending	Please see new remediation for the two findings above. In addition, the factory has submitted proper records and photographs ensuring that MSDS and PPE are being posted and used.	Document and photographs are in place for checking	Completed
Ventilation/Electrical/Facility Maintenance		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.	Electrical wires was not organized and not properly labeled within the electric circuit.	Box found open (safety gate D1 and ground floor).		Observation			Factory should ensure that electrical wiring throughout the facility is safely installed. Factory should ensure that all electric circuit boxes should remain closed at all times.	3/31/2006 (electrical wiring); 04/30/2006 (visual boxes)	March 23, 2006 (Photograph sent) Photograph shows ceiling mounted electrical wiring.	April 1, 2006: Factory is requested to submit photographs of electric boxes in security gate 1 and on ground floor.	Photograph	Pending	Factory management has submitted the pictures of well covered electrical boxes in security gate 1 completed in April 2006. In addition, periodic maintenance check lists have been set up for ensuring proper electrical connections in every area.	Photographs	On-going
Sanitation in Facilities	In the case of male and female workers, all facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with applicable laws, rules for every 25 females. Factory rules 1976, Sec-27(1) & 8.	All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with applicable laws.	Insufficient number of female toilets.		1st floor female toilets insufficient with 207 workers, requires 12 of which only 8 are present. 2nd floor: 248 female workers; 10 toilets required but only 7 are present. Toilets are without towel and sandal.				Based on the number of female workers (645), total toilet requirements, per Reebok International, Inc. standards is 16. Local laws require 22. Factory needs to provide additional toilets required by law.	04/30/2006	March 23, 2006: "We are having total 40 female workers and 10 female toilets. So now 23 female worker is using one toilet."	March 23, 2006: Based on number of female workers (440), the factory needs 18. It reports having 10.		On-going	As per workers ratio and local law requirements, the factory had made a provision of sufficient toilets for female workers in every production floor. Factory is also based on the address AQ HSE Guidelines to reconsider the actual facility of the factory.		Pending
Other						Visual inspection	Functional Effluent Treatment Plant: ETP installed at the factory.										
<b>Freedom of Association and Collective Bargaining</b>																	
Employers will recognize and respect the right of employees to freedom of association and collective bargaining.																	
Other				WVC (Worker Welfare Committee) is active and functional in the factory. However member have been selected by management.		Documentation review and interview with WVC members and management.	Workers Welfare Committee consists of 10 members. Monthly WVC meetings with the management on workers' issues out of their observation and present to the management to resolve. Minutes of the meeting are recorded and posted on the notice boards.		Factory's worker welfare committee representatives must be chosen by their fellow workers from different sections of the factory. No management or supervisory staff should be involved in any way in the selection or representation of worker reps. Factory will ensure that workers themselves select WVC members.	4/30/2006	March 23, 2006: "Workers are choosing their members." (see factory notice dated Feb 15, 2006 workers of Line 9 have elected a senior operator to the welfare committee.	March 23, 2006: Factory's general notice lists number of votes workers had cast for each of the three competing to be WVC representatives.		Completed and on-going			On-going
<b>Wages and Benefits</b>																	
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.																	
Payroll Reporting		Accurate and reliable payroll reporting, including pay stubs will be provided.	Payroll not complete.		Only legal working hours payments are recorded and others inaccurately calculated. Example: Payment Deduction (absent days for the separated workers (who left the job without information) is calculated from the gross wages not from basic wages.		Documents review and management interview.		Factory must ensure that workers are paid for all hours worked.	4/30/2006	March 23, 2006: "I am separated worker leave the job by doing work only 4 days of a month, don't he observe whole month house rent and other expenses."	April 1, 2006: Factory is requested to submit examples of payment made to workers at separation from employment indicating calculation of payments made.		Pending	Factory has submitted payroll records from April 2006 that indicated a proper calculation of payment was made as per law requirements.	Document in place for checking	On-going
Time recording System		Time worked by all employees, regardless of compensation system, will be documented by time cards or other accurate and reliable recording systems such as electronic swipe cards.	Actual working hours in timecard is not recorded.		Time recording system is not reliable as it only records the legal working hour (8 hour = 2 hours OT =10 hours a day).		Visual observation and documents review.		Factory must ensure that all working hours is accurately recorded. Factory must install automated punch card machines to record working hours and ensure that workers themselves punch cards when they report for work and when they leave factory.	4/30/2006			Pending	Factory has submitted action plan that the installation of an automatic punch card machine is in process and expect to be put into practice in January 2006.		Pending	
Record Maintenance		All compensation records will be maintained accurately and should be acknowledged by the employee as accurate.	Excessive OT is recorded separately.	Management provided example of excessive OT.		Further records kept hidden to the monitor.	Management interview, documentation and workers interview.							Pending	All compensation records are maintained accurately and are signed by workers to indicate acknowledgment of having received payment.	Documents are in place for checking.	Pending

FLA Code/Compliance Issue	Country/Legal Reference	FLA Benchmark	IEM FINDINGS					REMEDATION				Documentation	Completed Pending Ongoing	UPDATE			Completed Pending Ongoing
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Legal Compliance for Holiday/Leave	If a worker works on weekly holiday, then it is to be adjusted on one of the 3 days immediately before it. Factory Act 1965, Sec. 51.	Workers will be paid for holidays and leave as required by law.	Friday work is not regularly compensated with one day off within 3 days.	Holiday (Friday) works sometimes finishing 18h and 25 in the sewing and finishing section are not adjusted on one of the 3 days immediately before it.	Worker and management interview and documentation check.	Factory should, as part of its working hours policy, include provisions from local laws providing for compensatory day off within three days of work over any weekend holiday.	4/15/2006	March 23, 2006: "We did some development work on those days. (Copy of bill enclosed)." March 23, 2006: Factory has provided payment records made to substantiated daily wage workers for construction and maintenance work on Nov. 17, 18, 20, 23, 24, and 25.	April 1, 2006: Factory is advised to invite Reebok International, Ltd. agent "" to conduct independent investigation of allegation of work for Nov. 18 and 25 in sewing and finishing sections through interview of workers and documents review and submit report to Reebok International, Ltd.						PC's buying agent and compliance consultant team have conducted independent investigation on May 4, 2006 and did not find any authentic working hours records on those dates. Buying agent has asked the Factory to be more transparent, clear and to maintain sufficient records that are available for any monitor (PCFLA) to review.	On-going	
Accurate Recording of Wage Compensation	All hourly wages, piecework, bonuses, and other incentives will be calculated and recorded accurately.		Regular wages with 2 hours OT not paid by 10th of following month.	OT payments are paid between 18th and 20th of following month.	Documentation check and management interview.	Factory should make all overtime payments together with wages by the 10th of the following month. Factory should post notice of payday on factory notice board that specifies overtime is paid on same day.	4/30/2006	March 23, 2006: "We used to pay regular wages and 2 hours OT within overtime payment is also made on payday."	April 1, 2006: Factory is requested to submit copy of notice announcing overtime payment is also made on payday.	March 23, 2006: Factory has submitted except from payroll dated Feb. 8, 2006 which records overtime payment against recipient's signature.	Pending		Factory has submitted payroll records that illustrate all payment including overtime wages has been made on same pay date.	Copy of payroll is available for verification.	Completed		
Timely Payment	Monthly salary & overtime payments are to be paid together by the 7th to 10th of each month for the factory leaving workers 1000 and more than 1000. Payment of wages Act 1936, 51(a)&(b).	All compensation shall be paid in a timely manner.	Regular wages with 2 hours OT not paid by 10th of following month.	OT payments are paid between 18th and 20th of following month.	Worker and management interview and documentation check.	Factory should make all overtime payments together with wages by the 10th of the following month. Factory should post notice of payday on factory notice board that specifies overtime is paid on same day.	4/30/2006	March 23, 2006: "We used to pay regular wages and 2 hours OT within overtime payment is also made on payday."	April 1, 2006: Factory is requested to submit copy of notice announcing overtime payment is also made on payday.	March 23, 2006: Factory has submitted except from payroll dated Feb. 8, 2006 which records overtime payment against recipient's signature.	Pending		Factory has submitted payroll records that illustrate all payment including overtime wages has been made on same pay date.	Copy of payroll is available for verification.	Completed		
False Payroll Records	Employers will not use hidden or multiple payroll records in order to hide overtime, to falsify demonstrate hourly wages, or for any other fraudulent reason.		Employers maintain double records and hide extra hours of work.	Payment could not be verified as documents (except 2 hours OT payment records) not disclosed to the auditors.	Documentation check and worker interview.	Factory must maintain credible records of all hours worked and make this available to Reebok International, LTD authorized auditors. It should post notice on factory notice board offering incentives to employees reporting through a secure channel instances of double records and initiate appropriate disciplinary measures against all defectors.	4/30/2006	March 23, 2006: "We will disclose if we do anything like that."	April 1, 2006: Factory must invite Reebok agent "" to conduct an independent investigation of allegation of undocumented overtime exceeding two hours per day. Report of investigation must be made available to Reebok by deadline date. Factory is advised to also submit copy of notice inviting reports of violations.		Pending		Compliance consultant has conducted independent investigation through May 4 2006 and found 2 extra hours of automatic time card in overtime on November 27, 2006 that had been previously reported to PC compliance manager. Factory must: 1. Install urgently a swiping card system that can better monitor the hours of work records, 2. Reinforce the OT policy by giving extra training to supervision/line leader/production manager, and clearly state their level of responsibility regarding the credibility of working hours as well as OT records, 3. Production management/worker must be involved and Factory management must be involved in all payroll records including overtime payment records as per law requirements.	Action plan for investigation through May 4 2006 and found 2 extra hours of automatic time card in overtime on November 27, 2006 that had been previously reported to PC compliance manager. Factory must: 1. Install urgently a swiping card system that can better monitor the hours of work records, 2. Reinforce the OT policy by giving extra training to supervision/line leader/production manager, and clearly state their level of responsibility regarding the credibility of working hours as well as OT records, 3. Production management/worker must be involved and Factory management must be involved in all payroll records including overtime payment records as per law requirements.	Document in place for verification.	Pending	
Record Maintenance	All legally required payroll documents, journals and reports will be available complete, accurate and up-to-date.		Revenue stamp is not fixed with the separated workers payment record.	Revenue stamp is not fixed on the payment records of the workers resigned for October 2005.	Documents review and management interview.	Factory management must ensure that all revenue stamps included in all payroll records issued by law, including on the records of workers who leave the factory due to termination or resignation.	4/30/2006				Pending			Document in place for verification.	Completed		
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.																
Overtime Limitations	60 hrs. weekly work including OT. No substitution shall be made which will result in any worker working for more than 11 days consecutively without a holiday for a whole day. Factory Act 1965, Sec. 51.	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.	Working hour cross the legal limit of 10 hours repeatedly.	Occurred in October and November 2005. For example, on November 29 night work up to 11:00h. Observed by the monitor and on December 3, 2005.	Visual observation and worker interview.	Factory must post its working hours policy on factory notice board. Barring extraordinary circumstances, it may not exceed working hours calling provided by local law and Reebok International, LTD standards. All instances of excessive work must have prior concurrence from Reebok International, LTD.	3/31/2006	March 23, 2006: "Our Textiles unit is working 24 hours a day (shifting basis) and overtime is same for both units."	April 1, 2006: Factory is requested to submit a copy of its working hours policy and photograph of its posting on factory notice board.		Pending		Checked by addres AG SEA in Nov 23, 2006. Copy of posted working hours and overtime policy on notice board from April 2006 is available.	Copy of this policy available on notice board.	On-going		
Reduce Mandated OT	The employer will demonstrate a commitment to reduce mandated overtime and to enact a voluntary overtime system to meet unforeseen situations.		Strategy to reduce OT not demonstrated.		Management interview.	See remediation plan for non-compliance findings.						Pending		The factory has constructed new floor with 4 additional new sewing lines that have come into full operation in October 2006. The factory is doing overtime within legal limit. As per production plan and management information, factory has set up additional lines to help control OT by sharing workload with the other lines. Factory has been requested to submit to the PC's compliance both the monthly OT schedule and OT tracking sheet for monitoring.	Photograph	On-going	
Explanation of Continued Required OT	If the employer repeatedly requires overtime in order to respond to the same situation, the employer will explain why it will not have sufficient staff on hand to avoid the necessity of overtime.		Management informed that additional lines are planned to set up.		Management interview.	See remediation plan for non-compliance findings.						Pending		The factory has constructed new floor with 4 additional new sewing lines that have come into full operation in October 2006. The factory has submitted some photographs of operational sewing lines from October 2006 (attached).	Photograph	Completed	
Overtime Explanation	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.		Employer justify additional work requirements with delivery pressure and informs at the beginning of the day for OT request.		Management interview.	See remediation plan for non-compliance findings.						Pending		As per WRAP requirement the factory has defined extraordinary business circumstance and followed accordingly when any extra work is required. The factory has submitted a copy of obtained WRAP Certificate and policies on extraordinary business circumstances from October 2006 (attached). Currently, the factory management is working overtime on a voluntary basis and is recording all OT hours in workers' timesheet. As per policy requirement, OT will be notified 14-20 hours before it is needed.	Certificate posted at entrance.	On-going	
Voluntary OT	Overtime hours worked in excess of code standard will be voluntary.		OT only verbally accepted to be voluntary.		Worker interview and documentation check.	See remediation plan for non-compliance findings.						Pending		The factory has posted notice for voluntary OT and providing training to Voluntary OT as well. Photograph and training records have been submitted to prove that volunteer overtime policy is properly implemented.	Documents and photograph are in place for checking.	On-going	
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.																
Legal Benefits	The factory shall comply with applicable law for premium rates for overtime compensation.		OT not provided to all workers.	From Grade 2 and above (Grade 2 and Grade 1) workers (like J. Asst. supervisor, temp worker, OCI) are not paid overtime. They work on fixed wages basis. Cleaners' OT are also not paid.	Documentation check and management interview.	Factory must pay overtime to all workers identified in Gazette notification of 1964. Factory should post its wage policy on its employees notice board.	4/30/2006	March 23, 2006: "We are paying OT to all Grade 2, 1 workers and we are bound for Grade 1 employees. April 1, 2006: Factory is advised to submit payroll from March including payment made to Grade 1 employees together with a copy of its wage policy."	March 23, 2006: Pay sheet submitted from Feb. 2006 shows overtime payment to cleaners and Grade 1 employees. No overtime payment was found for Grade 1 employees. April 1, 2006: Factory is advised to submit payroll from March including payment made to Grade 1 employees together with a copy of its wage policy."	Pay sheet submitted from 2/2006.	Pending		Checked by addres AG SEA on November 23, 2006. Payroll records from August to October 1, 2006 indicated the proper calculation made to Grade 1 to 7 per law requirements.	Factory has submitted payroll records made to Grade 1 workers.	Document in place for verification. Copy of payroll is available for verification.	Completed	
Accurate Recording of OT Hours Worked	Employees will be paid for all hours worked in a workweek. Calculation of hours worked must include all time that the employer allows or requires the worker to work.		Workers are not paid for all worked hours.	Actual working hours records are not maintained and shown payment and are paid to auditors. Fibby work is carried out but, for excessive work, no record is maintained or shown to the auditors.	Worker interview and management interview. Production records and workers interview.	Factory must ensure that all working hours is accurately recorded. Factory must install automated punch card machines to record working hours and ensure that workers themselves punch cards when they report for work and when they leave factory. Factory will issue instructions on factory notice board providing for (i) all workers to record all hours worked personally on punch cards, and (ii) spell out its policy of zero tolerance to falsify, comply and institute disciplinary measures against any employee failing to comply with policy of recording all hours worked.	4/30/2006	3/23/2006: Factory is requested to submit to Reebok International, LTD a photograph of the posted notice and a copy of the instructions.			Pending		New 23-2006 addres AG SEA had also requested Factory has submitted a photograph of posted notice regarding working hours, weekly holidays and payment instructions from June 2006. All workers including cleaners are compensated for all OT properly from May 2006.	Document in place for verification. Copy of payroll is available for verification.	On-going		
Miscellaneous																	