

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	USA
Factory name	22008215D
IEM	CSCC
Date(s) in facility	Nov. 8 & 9 2005
PC(s)	Jostens, Inc.
Number of workers	94
Product(s)	Classic rings
Production processes	Casting, Design, Tooling, CNC, Finishing, Engraving, etc.

FLA Code/ Compliance issue	Country Law/Legal Reference	FLA Benchmark	Non-compliance	Risk of Non-compliance	IEM Findings				PC Remediation plan	Remediation			[Status]	
					Evidence of Non-compliance (un corroborated)	If not corroborated, explain why	Sources/Documentation used for corroborating	Notable Features implemented by Factory Management or Company		Target Completion Date	Factory Response (Optional)	Company follow up (Site date of follow up)		Documentation
1. Code Awareness														
Worker/management awareness of Code		FLA Principle of Monitoring, Obligation of Companies: Ensure that all Company factories as well as contractors and suppliers inform their employees about the workplace standards orally and through the posting of standards in a prominent place (in the local languages spoken by employees and managers) and undertake other efforts to educate employees about the standards on a regular basis.	The interviewed employees reported not being aware of the Code of Conduct or remembering if they took any Code Awareness Training in the past.					Employee interviews.	Compliance training, which includes information on the Jostens Code of Conduct is conducted on a yearly basis at all Jostens' plants. Employees sign an acknowledgement of having received the training for all new and existing employees. Annual compliance training was held on 10-27-05, 11-01-2005, 12-01-2005 and 12-13-2005	12/13/05			An Acknowledgement of 2005 Compliance Training document is in each employees personnel file in the *** facility. Contents of the compliance training is also on file.	Completed
2. Forced Labor														
There will not be any use of forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise														
3. Child Labor														
No person will be employed at an age younger than 15 (or 14 where the law of the country of manufacture allows) or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15.														
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.														
5. Nondiscrimination														
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.														
Hiring Discrimination Practices		Employment decisions will be made solely on the basis of education, training, demonstrated skills or abilities. All employment decisions will be subject to this provision. They include: hiring, job assignment, wages, bonuses, allowances, and other forms of compensation, promotion, discipline, assignment of work, termination of employment, provision of retirement						Employee interview.	The situation referenced has been resolved. Specific HR matters regarding Jostens employees are confidential; therefore, we are not able to discuss any specific actions in detail. All Jostens employees are required to be in compliance with Jostens' Code of Business Conduct and Ethics, Jostens' Workplace Code of Conduct and HR policies and procedures. However, please note that this Supervisor no longer works for Jostens.	2/3/05			Documentation on file of corrective action	completed
6. Health and Safety														
Employers will provide a safe and healthy working environment to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of employer facilities														
7. Freedom of Association and Collective Bargaining														
Employers will recognize and respect the right of employees to freedom of association and collective bargaining														
8. Wages and Benefits														
Employers recognize that wages are essential to meeting employees' basic needs. Employers will pay employees, as a base, at least the minimum wage required by local law or the prevailing industry wage, whichever is higher, and will provide legally mandated benefits														
Record Maintenance		All legally required payroll documents, journals and reports will be available complete, accurate and up-to date. (In the United States terms this would include W-4s, I-9s, green cards, 941s and supporting material	It was found that I-9's Section 1 and/or 2 of temporary employees from [Staffing Company 2], one of the labor service companies, were not complete.	[Staffing Company 1], the other labor service company, did not provide its employee's I-9 form for review.				Documentation review.	Required written documentation from both [Staffing Company 1] and [Staffing Company 2] of compliance to this requirement.	2/15/06			Written documentation from both companies of commitment to comply with this requirement on file at Jostens and available upon request .	Completed

		IEM Findings							Remediation					[Status]
FLA Code/ Compliance Issue	Country Law/Legal Reference	FLA Benchmark	Non-compliance	Risk of Non-compliance	Evidence of Non-compliance (un corroborated)	If not corroborated, 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 (Cite date of follow up)	Documentation	Completed, Pending, Ongoing
9. Hours of Work														
Except in extraordinary business circumstances, employees will (i) not be required to work more than the lesser of (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture or, where the 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		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	The employees worked more than 52 hours a week (40 regular hours plus 12 hours overtime) during the weekending 11/16/05. The maximum weekly working hours found on the reviewed records were 57.50.				Documentation review.		Plant will conduct a weekly review of production hours to help manager overtime requirements and to provide employees, when feasible, information related to upcoming overtime hours expectations and approximately a 24 hour prior notice. Jostens makes every attempt to comply with the overtime hours stated in the Jostens Workplace Code of Conduct. Due to the highly specialized nature of work and the seasonality of the business, Jostens attempts to remain as flexible as possible in order to minimize layoffs (where possible), reduce turnover and to mitigate the impact of retiring employees.	2/28/06			Weekly reviews of production hours have been implemented.	Completed
Voluntary OT		Overtime hours worked in excess of code standard will be voluntary	According to the company, overtime policies and employee testimonies, overtime is mandatory when it is scheduled by the management.	1. According to the facility overtime policies, the employees shall receive 24 hours up to one week notice in advance if mandatory overtime is scheduled. However, the interviewed employees reported that they received notice by the beginning of the day that the overtime hours need to be worked in 95% of the cases. 2. The employees from the finishing area reported group daily quota. They are not allowed to go home if the group daily quota is not achieved.			Employee interview, management interview, and documentation review.		Plant will conduct a weekly review of production hours to help manager overtime requirements and to provide employees, when feasible, information related to upcoming overtime hours expectations and approximately a 24 hour prior notice. Jostens makes every attempt to comply with the overtime hours stated in the Jostens Workplace Code of Conduct. Due to the highly specialized nature of work and the seasonality of the business, Jostens attempts to remain as flexible as possible in order to minimize layoffs (where possible), reduce turnover and to mitigate the impact of retiring employees.	2/28/06			Weekly reviews of production hours have been implemented and employees are notified of expected overtime with approximately 24 hour prior notice.	Completed
10. 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.														
Miscellaneous														