

The factual information set forth on the Tracking Charts was submitted to the FLA by each Independent External Monitor and Participating Company and reviewed by FLA staff. It is being made available to the public pursuant to the FLA Charter in order to strengthen the monitoring process. The FLA Charter provides for regular public disclosure of the factual results of independent monitoring and the resulting specific actions taken by Participating Companies.

What is a Tracking Chart?

Compliance is a process, not an event. A Tracking Chart outlines the process involved in FLA independent external monitoring and remediation. It is used by the accredited independent external monitor, the participating company and the FLA staff to do the following:

- **Record Findings:** The independent external monitor uses the Tracking Chart to report noncompliance with FLA Code standards. The monitor should also cite the specific Code benchmark or national/local law that was used to measure compliance.
- **Report on Remediation:** The FLA participating company uses the Tracking Chart to report on the remediation program that was implemented in order to resolve the noncompliance and prevent any future violations.
- **Evaluate Progress:** The FLA uses the Tracking Chart for purposes of collecting and analyzing information on the compliance situation of a particular factory and for publication on our website. This information is updated on an ongoing basis.

What a Tracking Chart is NOT -

- An exhaustive assessment of factory conditions

Working conditions - in any type of workplace - are dynamic. Each Tracking Chart represents a survey of the factory's conditions on a specific day. Over time, a fuller picture emerges as we compile information from various sources to track the compliance progress of a factory.

- A pass or fail evaluation

The Tracking Charts do not certify whether or not factories are in compliance with the FLA Code. Monitoring is a measurement tool. The discovery of noncompliance issues is therefore not an indication that the participating company should withdraw from a factory. Instead, the results of monitoring visits are used to prioritize capacity building activities that will lead to sustainable improvements in the factory's working conditions.

- A one-time event

Each monitoring visit is followed by a remediation program, further monitoring and remediation in an ongoing process. The Tracking Charts are updated accordingly.

Note on Language

Please be advised that because FLA independent external monitors are locally-based and English is generally not their native language, the language presented may at times appear unclear to a reader who is a native English speaker. In order to preserve the integrity of the transparency process and the information we receive, our policy is to publish the original text from the monitor and participating company. However, the reader will note that we have taken the precaution to remove any identifying information about the factory that was monitored or the workers interviewed.

For example, in cases where monitors and/or participating companies have cited the actual number of workers in reference to a noncompliance issue, in order to protect the workers' identities, we have replaced the numbers with generic wording in brackets (i.e. "[some]", "[worker interviews revealed that]", etc.).

We do not disclose the name of the factory that was monitored in order to ensure that the FLA's efforts to encourage and reward transparency do not have detrimental consequences for the factory and the workers.

Instructions for Printing

The information contained in the Tracking Charts is organized by columns and rows in a table format. Due to the number and width of the columns, the charts have been formatted for legal size (8.5 x 14in.) paper. To print the charts, please make sure to select "legal" size paper from Print properties.

FLA Audit Profile	
Country	Bulgaria
Factory name	9100114096
IFA	Balkan Institute for Labour and Social Policy
Date(s) in facility	2-3 October 2006
PCA(s)	Jedlana-Group AG
Number of workers	1204
Product(s)	Socks, underwear, pantyhoses
Production process	Socks: Sewing of socks toes, training, pairing, stamping, marking, Sacking, expedition

FLA Code	Compliance Area	Country/Law/Reg Reference	FLA Benchmark	Non-compliance	Risk of Non-compliance	Evidence of Non-compliance (noncorrobated)	Not corroborated, explain why	Source/Documentation used for corroborating	Notes/Findings reported by Factory Management	PC Remediation plan	Target Completion Date	Remediation Factory Response (if/when)	Company follow up (December 2006)	Documentation	Compliance Pending On	Company Follow up	Updates (First June 2007)	Documentation	Compliance Pending On	Final Evaluation (Date)	Time/Priority Verification	Documentation	Company Follow up (Date of closure of follow up visit, if appropriate)	Documentation
1	Code Assessment		FLA Principle of Monitoring, Obligation of Companies: Establish and articulate clear, written workplace standards. Formally convey those standards to Company facilities as well as to business, contractors and suppliers.					Interviews with managers and workers	The Code of Conduct of Jedlana is posted in several places in Bulgarian and English.															
2	Confidential non-compliance reporting channel		FLA Principle of Monitoring, Obligation of Companies: Design a secure communication channel to be used by the factory employees for reporting non-compliance. To include 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.					Interviews and visual inspection did not spot any communication channels to address.	The Code of Conduct of Jedlana is posted in several places in Bulgarian and English.	12/25/2007	12/25/2007	There are implemented	Minutes of the worker representatives meeting and suggestion box	On-going	Suggestion boxes are opened and feedback is posted together with the help of management. The Open Letter to Workers from the audit Group) which PCA's content details are written are posted on several places. Workers have been given a training about this. (Bulgarian). However, there was no worker representatives meeting held for January and April 2007. Management was committed to hold the meetings and provide a reply schedule for these meetings.									
3	Freedom of Movement		FLA Principle of Monitoring, Obligation of Companies: Ensure that all Company facilities as well as contractors and suppliers inform their employees about the workplace standards only and through the use of standards in a prominent place (in the local language spoken by employees and managers) and undertake other efforts to educate employees about the standards on a regular basis.					Interviews with managers and workers	1. Documented training will be given to all workers and middle management about the Code for the workplace standards.	12/25/2007	12/25/2007	Since the 27th of November the facility does not use any restriction on the gate. Any worker who wants to go out during breaks will do so from and after their name on it and give out without being permission form.	On-going	Worker interviews prove that the remediation was implemented. Workers are still the notification document which is visible at the security desk without having to go for it, and then leave the factory premises.	Completed									
4	Freedom of Movement	Labour Code, Art. 148 para 3	Employees are prohibited from practices that restrict a worker's ability to terminate his or her employment or to seek other employment, including the imposition of coercion, deposits, unreasonable financial penalties or retention fees, and access to and renewal of identity papers and/or work permits or other legal identification documents.	Original WRRB are bound in the personal files	Risk of restriction of the freedom of entering and leaving employment relations			Personal files	1. The facility will use for the WRRB on the first day of the workers to stamp and then give back the workers on the same day. 2. The facility will prepare a policy with procedures and an assigned person to provide sustainability to the implementation. 3. The facility will get to reach the original WRRB. There are still in the facility in order to return them.	12/22/2006	12/22/2006	We have sent letters to each of the 160 workers that they did not come to work for the last two months. We are now waiting for them to come and get their original WRRB. There are informed them to come and get back their original WRRB.	On-going	The last remaining WRRB were given back to the ex workers or their relatives on June 20th, 2007.										
5	Recruitment Contracts		There can be no employment terms (including contracts, recruitment arrangements, or any other instruments) which specify that employees can be confined or be subjected to restrictions on freedom of movement also employees to hold wages already earned, provide for penalties resulting in paying back wages already earned, or in any way penalize workers for terminating employment. It is acceptable to provide bonuses to workers who for a term of contract and meet reasonable conditions, such as regular attendance.					Written procedure for hiring and dismissal of workers																
6	Other	Labour Code, Chapter 5, Art.62 para 1, Art.63 para 1 and 2	Worker shall have a copy of the signed employment contract	W/ temporary and W/ other workers interviewed off-site said they don't have employment contracts				Worker interviews	1. All workers will be asked if they have their employment contracts or not. The manager will prepare a list for the workers to sign in their names if they received a copy of that. 3. and if not they will sign 2. Any worker who is found to have not received their contract will be provided one.	12/22/2006	12/22/2006	1. Worker interviews and worker files indicated that workers interviewed on the audit date have a copy of their employment contracts. 2. Workers also said that the management asked if there are any workers who do not have a copy of their contract. 3. New workers said that they received it before they started working.	On-going	All workers who did not have received a copy of their labor contracts received one given a copy of their labor contract on their first day.	Completed									
7	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 when such age is higher than 15.					Personal files	1. Copies of personal ID cards or birth certificates must be available in all personal files. 2. The worker files will be completed on the first day of employment. 3. The procedure to provide a sustainable solution will be written in details within the hiring policy.	12/15/2006	12/15/2006	1. Factory management has begun to request the copies of the personal ID cards or birth certificates. 2. There are no missing documents in the files of the new workers from last two months. 3. There are still around 270 worker files with missing documents.	On-going	All missing documents in the personal files are completed in March 2007.	Worker files checked. No missing document in the checked files and the management also confirmed that they have given over them one by one and completed them all.	Completed								
8	Children on premises		Children under the local minimum working age will not be allowed in the factory work area of any firm, unless they are part of a guarded school group or other such enclosed event. Children must not ride parkers in the factory production areas.					Worker interviews	1. A written policy with detailed procedures will be prepared about the hiring and employment of juvenile workers. No workers under the legal age limit must be allowed to work at the factory under any circumstances.	12/22/2006	12/22/2006	We never had workers under the age of 16. And all juvenile workers are employed according to the law.	On-going	There was no juvenile worker on the audit day. The hiring policy stated that underage juveniles (child labor) are not permitted and they have prepared a separate policy for juvenile workers which stated clearly the working standards for juveniles. However the policy was not translated in Bulgarian yet. The policy will be translated into Bulgarian and it will be posted on the notice boards. 2. A training will be given to all workers. The management is committed to complete the translation and training till the 1st August.										
9	Child compensation for juvenile workers	Labour Code, chapter 15, section 1 Regulation No 4187 on the jobs prohibited for persons between 15 and 18	Workers will comply with applicable laws that apply to juvenile workers, i.e., those between the minimum working age and 18, including regulations relating to hiring, working conditions, types of work, hours of work, proof of age documentation, and overtime	Workers from off-site interviews stated that juvenile workers worked normal jobs as the rest of the workers				Accounting documentation-payroll slips	1. Juveniles must not be allowed to work night shifts. 2. A written policy with detailed procedures will be prepared about the working hours of juvenile workers.	12/22/2006	12/22/2006	We never had illegal juvenile workers and we do not know what it means. The policy was still not ready. The factory management will complete juvenile policy to ensure once it is completed.	On-going	There was no juvenile worker on the audit day. The hiring policy stated that underage juveniles (child labor) are not permitted and they have prepared a separate policy for juvenile workers which stated clearly the working standards for juveniles. However this policy was not translated in Bulgarian yet. 1. The policy will be translated into Bulgarian and it will be posted on the notice boards. 2. A training will be given to all workers. The management is committed to complete the translation and training till the 1st August.										
10	Discrimination or Abuse		Every employee will be treated with respect and dignity. No employee will be subject to any physical, sexual, religious, psychological or verbal harassment or abuse					Document review, management interviews	1. A policy prohibiting any form of abuse including physical abuse will be prepared with detailed procedures and an assigned person to oversee its implementation to post policy in accessible areas to workers, as well as to communicate it in details to workers. Policy should include disciplinary measures for non-compliance with the policy.	Launch of the new policy: 12/22/2006. Orientation training to all workers: 12/29/2006.	12/22/2006	1. They have prepared a policy for prevention of physical abuse, however it does not have detailed procedures. The Factory management is committed to prepare the procedures which will be disseminated about in details and communicated this to the work force.	On-going	The policy for prevention of physical abuse has been drafted, and the assigned person to enforce and carry out the policy has been assigned. However, this policy was not translated in Bulgarian yet. 1. The policy will be translated into Bulgarian and it will be posted on the notice boards. 2. A training will be given to all workers. The management is committed to complete the translation and training by the 1st August.										
11	Sexual Harassment		Employees shall not offer preferential work assignments or other preferential treatment for any kind of actual or implied exchange for a sexual relationship, nor subject employees to prejudicial treatment of any kind in retaliation for refused sexual advances.					Document review, management interviews	1. A policy prohibiting sexual harassment will be prepared with detailed procedures and an assigned person to oversee its implementation to post policy in accessible areas to workers, as well as to communicate it in details to workers. Policy should include disciplinary measures for non-compliance with the policy.	Launch of the new policy: 12/22/2006. Orientation training to all workers: 12/29/2006.	12/22/2006	1. They have prepared a policy for prevention of sexual abuse, however it does not have detailed procedures. The management is committed to prepare the procedures which will be disseminated about in details and communicated this to the work force.	On-going	The policy for prevention of sexual abuse has been drafted, and the assigned person to enforce and carry out the policy has been assigned. However, this policy was not translated in Bulgarian yet. 1. The policy will be translated into Bulgarian and it will be posted on the notice boards. 2. A training will be given to all workers. The management is committed to complete the translation and training by the 1st August.										
12	Disciplinary Practices		Employees will utilize consistent written disciplinary practices that are applied fairly among all workers					Written procedure for disciplinary measures																
13	Training of Management in Disciplinary Practices		Employees will provide training to managers and supervisors in appropriate disciplinary practices.					Document review, management interviews	The training programme of middle management will be developed and announced to the middle management.	12/22/2006	12/22/2006	The revised training programme of middle management was still not ready. The HR manager agreed to submit the report by the 15th of Dec.	Pending	A documented training was given to all middle management on 22/12/2007 about the company policies (The English version of the updated policies were used). However, there is still no training programme for the audit. The management is committed to prepare and submit the training programme by 15th July 07.										
14	Disciplinary Action Punishment of Abuse Supervisor/Manager	Labour Code, Art. 127 para 2	Management will discipline (which includes constraints of counseling, warnings, demotions, and demerits) anyone (including managers or fellow workers) who engages in any physical, sexual, psychological or verbal harassment or abuse.					After a complaint to the management a supervisor was demerited for humiliating attitude																
15	Verbal Abuse	Labour Code, Art. 127 para 2	A supervisor used rude language and abused workers					Worker interviews	Detailed procedures will be prepared for the non-harassment policy and the training will be completed accordingly. Please see retribution under physical abuse.	Launch of the new policy: 12/22/2006. Orientation training to all workers: 12/29/2006.	12/22/2006	Training about the non-harassment policy given on the 13th of Oct 12/22/2006. However, this policy was not translated in Bulgarian yet. The management is committed to prepare the procedures which will be disseminated about in details and communicated this to the work force.	On-going	The policy for non-harassment has been drafted, and the assigned person to enforce and carry out the policy has been assigned. However, this policy was not translated in Bulgarian yet. 1. The policy will be translated into Bulgarian and it will be posted on the notice boards. 2. A training will be given to all workers. The management is committed to complete the translation and training by the 1st August.										
16	Monetary Fines and Penalties	Labour Code, Art. 272 para 1	Employees will not use monetary fines and penalties for poor performance					Document review - GU protocol	1. It will be written in the company policy that there is no monetary fines in the factory. 2. The Factory management to provide verbal training to all workers, including supervisors and managers on this policy.															
17	Discrimination		No person will be subject to any discrimination in employment, including hiring, salary, benefits, advancement, discipline, termination or retirement on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, or social or ethnic origin.																					

FLA Code/ Compliance Area	Country/Legal Reference	FLA Benchmark	Non-compliance	Risk of Non-compliance	ISM Findings (Uncompliant)	Not Compliant, not voluntary	Source/Documentation used for monitoring	Visible Features (Improvement by Factory Management or Company)	PC Remediation plan	Target Completion Date	Remediation (Factory Response (y/n))	Company follow up (December 2006)	Documentation	Timeline (Completed/ Pending/ On going)	Updates (After June 2007)	Documentation	Timeline (Completed/ Pending/ On going)	Final Verification (Date)	Final Verification (Date)	Company Follow up (On going/ Completed/ up visit, if appropriate)	Documentation
Sex discrimination		There shall be no differences in compensation and benefits attributable to gender		There is no written policy to prevent sex discrimination			Document reviews, management interviews		1. A policy to prevent sex discrimination will be prepared with detailed procedures and an assigned person to oversee policy. 2. New workers will be trained on discrimination policy during new employee training.	Launch of the new policy: 1/2/2006. Documented training to all workers: 1/29/2006.	Y	Factory management has prepared a policy to prevent sex discrimination. However it does not have detailed procedures on how factory plans to prevent sex discrimination. The factory management is committed to prepare procedures which have been discussed with PC and communicate policies and procedures to all workers in the factory.	On-going	The policy to prevent sex discrimination has been drafted, and the designated person to enforce and carry out the policy has been assigned. However, this policy was not translated to Bulgarian yet. 1. The policy will be translated into Bulgarian and will be posted on the notice boards. 2. A training will be given to all workers. The management is committed to complete the translation and trainings by the 1st August.		On-going			The policy and procedures to prevent sex discrimination is available in English.		
Pregnancy Discrimination		Information arising from pregnancy testing undertaken voluntarily will not be used as a factor in involuntary resignation, firing or making any other employment decision that disadvantages a pregnant woman		There is no written policy to prevent pregnancy discrimination					1. A policy to prevent pregnancy discrimination will be prepared with detailed procedures and an assigned person to oversee policy. 2. Policy will be communicated during new worker training.	Launch of the new policy: 1/2/2006. Documented training to all workers: 1/29/2006.	Y	1. Factory management has prepared a policy to prevent pregnancy discrimination. However it does not have detailed procedures. Factory management is committed to prepare these procedures which will be already been discussed in details with PC and communicate to the work	On-going	The policy to prevent pregnancy discrimination has been drafted, and the designated person to enforce and carry out the policy has been assigned. However, this policy was not translated to Bulgarian yet. 1. The policy will be translated into Bulgarian and will be posted on the notice boards. 2. A training will be given to all workers. The management is committed to complete the translation and trainings by the 1st August.		On-going		The policy to prevent pregnancy discrimination and its procedures are available in English.			
Pregnancy Accommodation	Labour Code, Regulation No 71/99 on minimum OSH requirements, Regulation No 11/187 concerning penalties for personal hygiene of women and for the rest of pregnant	Reasonable accommodation will be made in the event of a minimum OSH requirements, Regulation No 11/187 concerning penalties for personal hygiene of women and for the rest of pregnant		There is no written policy to prevent pregnancy discrimination			Visual inspection		Penalties for personal hygiene of women and for the rest of pregnant women will meet the requirements of the law	12/1/2007		The shower is still missing.	On-going	The management has started reconstructing the building and they confirmed that the showers will be completed by 10th Aug/07. It has been verified that the showers are half way completed.		On-going					
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 the occupation of employees/ jobs																			
Fire Safety, Health and Safety legal compliance	EU, Law on OSH, Regulation No 71/99 on minimum OSH requirements, Regulation No 71/99 on fire safety of premises at work	Employer will comply with appropriate health and safety laws and regulations. In any case where laws and codes of conduct are contradictory, the higher standards will apply. The factory will possess all legally required						The factory strictly adheres to all the fire safety legal requirements													
Chemical Management	Regulation No 12003 concerning protection against exposure of workers to chemical agents	Chemical 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			"Hazardousness" is used for clearing the storage and the disposal of the waste. Workers should receive training, appropriate to their job responsibilities, in the safe use of chemicals and other hazardous substances		Approved lists of PPE to be provided for to different categories of workers, Risk Assessment (6.11.2005)	The facility must document the use of a chemical/hazardous agent as it is considered a banned chemical in the PC. 2. Factory management will build an appropriate section for stain removing with proper ventilation, appropriate PPE and MSDS, and secondary containers. In addition, factory management must provide chemical management training to all workers who handle stain removing chemicals. 3. Factory management must provide documentation of all training provided.	1/2/2006			1. The management stopped cleaning stains in the facility since the PFA audit. 2. They are sending the damaged goods to the other approved facility with an approved stain removing agent. 3. Factory management will continue to do this and appropriate chemical removing area is completed.	On-going	They have a stain removing table with ventilation now. However the MSDS was not posted and the stain removing worker used not given a PPE or chemical handling training. The management was committed to get the MSDS and get an appropriate training for the worker by 15th July/07.		On-going					
Sanitation in Facilities	Regulation No 71/99 on minimum OSH requirements	All facilities including factory buildings, toilets, canteens, lockers, and canteens, shall be kept clean and safe and in a condition with water and soap		Water is not clean. Some of the wash-hand basins are not kept in good shape, basins for hot water and some of those for cold water are missing			Visual inspection, workers interviews	There is a medical doctor twice per week	Factory management will prepare a written policy for the cleaning workers about the daily, weekly and monthly procedures for cleaning and maintenance of the lavatories, including how to report if a problem with a faucet or waterline to the designated person.	1/21/2006		The lavatories were clean on the audit yet, however there is no system to report if a problem with a faucet or waterline to the designated person.	On-going	The lavatories were recently renovated and a cleaning person was hired to take care of the housekeeping/cleaning the lavatories on a daily, but in some places to which the lavatories are cleaned at least once every four		Completed					
Worker Participation	Law on OSH	Workers should be involved in planning for safety, including through worker safety committees		Workers are not aware of the existence of H&S committee, required by law, even though it exists in the documents			Worker interviews		During the training the H&S committee and its functions will be announced to all workers. Before the meetings the meeting date will be announced to all workers so that they can speak with the members of the H&S committee about any issue they want.	1/31/2007		The H&S committee is meeting once every three months and the minutes of these meetings are available. Since the training is not completed yet, there are still some workers who do not have enough information about the H&S committee.	On-going	The H&S committee is meeting once every three months on the minutes of these meetings are available. All workers have been trained about the role and functions of this committee.		Completed		Meeting notes available and checked			
Other	According to the LC the employer shall ensure that meals and refreshments for the workers during the night shift	The cafeteria does not work in the night					Worker and management interviews	Cafeteria must work at night during night shift	1/1/2006			Cafeteria currently opens during the breaks twice for all three shifts since the PFA audit.	Completed								
Freedom of Association and Collective Bargaining		Employers will recognize and respect the right of employees to freedom of association and collective bargaining																			
Wages and Benefits		Employers recognize that wages are essential to meeting employees' basic needs. Employers will pay employees, at a level at least the minimum wage required by local law in the prevailing industry, which is higher, and will provide legally mandated benefits																			
Wage Benefits Assessment		Employers will communicate orally and in writing to all employees in the language of the worker the wages, incentive systems, benefits and bonuses to which all workers are entitled in that company and under the applicable law		Some workers are not aware how the daily wage is formed, but the service is a changing often.			Worker interviews	Factory management will prepare a wage policy with detailed procedures on how wage is formed and assign a designated person to answer how wages (day/monthly) are calculated.	Launch of the new policy: 1/2/2006. Documented training to all workers: 1/29/2006.			Factory management posted wage calculation policy on the notice boards and announced it during the orientation training. However, since the trainings, some workers are still not aware of how wages are calculated.	On-going	Training has been given to all workers. Completed in March 2007. And after the company hand book is ready in Bulgarian, they will give another training about the company policies and procedures till the 1st of August.		On-going		Wage calculation policy available with procedures and its procedures are available on the notice boards.			
Information and Benefits		In general, workers will have access to understandable information about their wages and benefits, and will be aware of any discrimination with their ability to get information		There are no written rules how the remuneration is formed and calculated			Worker and management interviews, document review	1. The new wage calculation policy will be more clear in order for workers to better understand all points of the remuneration. 2. The revised policy will be posted and it will be announced during the training to all workers.	Launch of the new policy: 1/2/2006. Documented training to all workers: 1/29/2006.			Factory management has drafted policy on how the remuneration is calculated. However, policy may not be clear enough for all workers to understand.	On-going	A simplified version of the policy on how the remuneration is calculated is prepared and it is posted on the notice boards. Also a verbal training has been given to all workers about it.		Completed		The policy on how remuneration is calculated has been checked.			
Payroll Reporting		Accurate and reliable payroll reporting, including pay stubs will be provided						Very well kept accurately reporting system													
Pay statement		Employers will provide workers a pay statement each pay period, which will show annual wages, regular and overtime pay, bonuses and all deductions						Very well organized payment system with all necessary documents for recording the worked time													
Time-recording system		Time worked by all employees, regardless of employment system, will be recorded by time cards or other accurate and reliable recording systems such as electronic time cards						Double-checked systems for recording the worked time													
Payment of Legal Benefits		Legally mandated benefits will be provided or paid in full within legally defined time periods						Social insurance contributions are made according to the full remuneration for the month paid													
Timely Payment of Benefits		All legally mandated deductions for taxes, social insurance, or other purposes will be deducted each pay period in the legally defined account or transferred to the legally defined agency. This includes any mandatory payments for back taxes, etc. The employer will not hold any of these funds over from one pay period to the other unless the law specifies that deposits on the employer's behalf are required. If the law does not specify, then deposits will be made before the next pay period in full						Most of the workers said that they are with the factory because the payments are regular timely and solid													
Hours of Work		Except in extraordinary business circumstances, employees will (a) 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 such country, the 12 hours overtime, and (c) be entitled to at least one day off every seven days period																			
Excessive overtime		Except in extraordinary business circumstances, employers will make extensive efforts to secure voluntary overtime work prior to mandating involuntary overtime																			
Excessive overtime		Some workers in the production and packing line have worked more than the permitted overtime hours and days		8 of the workers said that they did not work overtime because they might be fined if they have too many overtime hours. They refuse to do OT or if they agree with the overtime.			Worker interviews	1. A written overtime working policy with detailed procedures and an assigned person to oversee it will be prepared and posted on all notice boards. 2. A documented training will be given to all workers on overtime policy. 3. The facility will also prepare an action plan within the policy on how they will avoid any excessive OT in the future.	Launch of the new policy: 1/2/2006. Documented training to all workers: 1/29/2006.			1. There is no policy with detailed procedures on voluntary OT. 2. Since the training is not completed yet, there are still some workers who say they think OT is compulsory. Factory management has discussed voluntary OT policy with managers and the managers communicated this to their assigned work force.	On-going	The voluntary OT policy has been drafted, and the designated person to enforce and carry out the policy has been assigned. However, this policy was not translated to Bulgarian yet. 1. The policy will be translated into Bulgarian and will be posted on the notice boards. 2. A training will be given to all workers. The management is committed to complete the translation and trainings by the 1st August.		On-going		The working hours policy and its procedures are available in English.			
Overtime Limitations	Labour Code - Art 140 para 1, 2, 3	Except in extraordinary business circumstances, employees will 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 such country, the 12 hours overtime, and (c) be entitled to at least one day off every seven days period. An extraordinary business circumstance is a temporary period of extra work that (a) has been exceptional or alleviated by other reasonable efforts		8 of the workers said that they did not work overtime because they might be fined if they have too many overtime hours. They refuse to do OT or if they agree with the overtime.			Worker interviews	1. A written overtime working policy with detailed procedures and an assigned person to oversee it will be prepared and posted on all notice boards. 2. A documented training will be given to all workers on overtime policy. 3. The facility will also prepare an action plan within the policy on how they will avoid any excessive OT in the future.	Launch of the new policy: 1/2/2006. Documented training to all workers: 1/29/2006.			We have once more announced after the PFA audit to each division that OT working is voluntary.	On-going	The management prepared an OT working policy, however there are no detailed procedures for the policy and there is no assigned person for this policy. 2. The management is committed to prepare these procedures which we have discussed about in details and communicated them to the work force.	On-going		The voluntary OT policy has been drafted, and the designated person to enforce and carry out the policy has been assigned. However, this policy was not translated to Bulgarian yet. 1. The policy will be translated into Bulgarian and will be posted on the notice boards. 2. A training will be given to all workers. The management is committed to complete the translation and trainings by the 1st August.		On-going		The working hours policy and its procedures are available in English.
Overtime Exemption		Employers shall be able to provide explanation for all instances in which the extraordinary business circumstance has been used. Employers shall take reasonable steps to inform workers about the nature and expected duration of the circumstances		There is a risk for overtime			There is no Register for Overtime	1. A written overtime working policy with detailed procedures and an assigned person to oversee it will be prepared and posted on all notice boards. 2. A documented training will be given to all workers on overtime policy. 3. The facility will also prepare an action plan within the policy on how they will avoid any excessive OT in the future.	Launch of the new policy: 1/2/2006. Documented training to all workers: 1/29/2006.			We have once more announced after the PFA audit to each division that OT working is voluntary.	On-going	The management prepared an OT working policy, however there are no detailed procedures for the policy and there is no assigned person for this policy. 2. The management is committed to prepare these procedures which we have discussed about in details and communicated them to the work force.	On-going		The management received the register for OT for the second half of 2006 on Jan 20th, 2007. The voluntary OT working policy is ready with detailed procedures and an assigned person. However this policy is not translated to Bulgarian yet. 1. The policy will be translated into Bulgarian and will be posted on the notice boards. 2. A training will be given to all workers. The management is committed to complete the translation and trainings by the 1st August.		On-going		The working hours policy and its procedures are available in English.
Other compliance with provisions	Labour Code - Art 140 para 1 item 1	The factory will comply with all applicable laws governing work hours, including those regarding or limiting the maximum use of overtime work performed by women or workers under the age of 16		Workers under 16 have worked longer than 7 hours as well as working night shifts in July and August			Payroll	1. A detailed working hours policy which includes the regulations on employment of juvenile workers will be prepared and posted on all notice boards. 2. A documented training will be given to all workers on overtime policy.	Launch of the new policy: 1/2/2006. Documented training to all workers: 1/29/2006.			The violation since August. The management found that the supervisor allowed the violation to happen. However, the working hours policy of the juvenile workers is still not ready. The management communicated this to the assigned work force.	On-going	The working hours policy is ready with detailed procedures and an assigned person. However, this policy was not translated to Bulgarian yet and its procedures are available in English.		On-going					
Other	Labour Code chapter 7 section III Art. 151	Lunch break is shorter than 30 minutes		Lunch break is shorter than 30 minutes				Lunch breaks will not be shorter than 30 minutes. 2. The working hours and all breaks will be posted on the notice boards and it will also be announced during the training.	1/21/2006			All our shifts always had lunch break.	On-going	All shifts have at least 30 minutes for lunch break. However, the stated working hours is still not posted on the notice boards. Yet, shifts and lunch information has been communicated to workforce.		Completed					
Overtime Compensation		In addition to their compensation for regular hours of work, employees will be compensated for overtime hours at such minimum 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																			