

<b>FLA Audit Profile</b>	
Country	Vietnam
Factory name	010084418E
IEA	Global Standards
Date(s) in facility	October 12-13, 2006
PC(s)	adidas AG
Number of workers	991
Production(s)	Golf club heads
Production processes	Tooling, Waxing, Shelling, Casting, Processing, Polishing, Assembling, Packing

FLA Code/Compliance Issue	Country Law/Legal Reference	FLA Benchmark	Noncompliance	Risk of Noncompliance	EM Findings					Remediation	Status	Updates	Status	Updates	Status	Updates	Third-Party Verification (Date)		
					Evidence of Noncompliance (Uncorroborated)	If Not Corroborated, Explain Why	Source, Documentation Used For Corroborating	Notable Features	PC Internal Audit Findings (Yes/No)									PC Remediation Plan	Target Completion Date
<b>1. Code Awareness</b>																			
Work/Management Awareness of Code		<b>FLA Principle of Monitoring, Obligation of Companies:</b> Managers must ensure that employees are aware of the standards and requirements of the standards on a regular basis. Managers must ensure that employees are aware of the standards on a regular basis. Managers must ensure that employees are aware of the standards on a regular basis.	Company did not post/communicate Code of Conduct (CoC) to the workers.			Management interview, Worker interview, Record review				3/1/2007	Address CoC in under revision and will be finalized by 2/2007. All workers will receive CoC in 2007. PC is currently working to prepare ways to communicate new CoC to workers.	Pending	New policy from adidas: Workplace Standards and CoC Letter to Workers will be issued to all workers in the first week of April 2007. As soon as Workplace Standards are sent to the factory, they will post them to the Bulletin Board for all employees.						
Confidential Noncompliance 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 any non-compliance with the workplace standards, with security that they shall not be punished or prosecuted for doing so.	Company has not put in place a direct, confidential non-compliance reporting channel to PC.			Management interview, Worker interview, Record review					As part of the internalization of communication channels, PC encourages factory management to create internal communication channels, the following internal policies were verified: (i) Grievance Policy is factory-wide available; (ii) Grievance Policy training has been conducted for all workers; (iii) PC is available to all workers (working 800 participants).	Completed and Ongoing	CoC in place signed on August 2006. Training Doc. in place with workers' signatures.						
<b>2. 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.																			
<b>3. Child Labor</b>																			
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.																			
<b>4. Harassment or Abuse</b>																			
Employees will be treated with respect and dignity. No employee will be subject to any physical, sexual, psychological or verbal harassment or abuse.																			
Progressive Discipline	Chapter 14 of Labor Code Decree 113/CP-1999 Decree 33/2003/ND-CP Circular 19/2003/TT-BLĐTĐXH	<b>FLA Principle of Monitoring, Obligation of Companies:</b> Managers must ensure that employees are aware of the standards and requirements of the standards on a regular basis. Managers must ensure that employees are aware of the standards on a regular basis. Managers must ensure that employees are aware of the standards on a regular basis.	Disciplinary practices do not follow local legal regulations. In some cases workers were disciplined without adequate documentation or review by committee and Trade Union.			Record review, Management interview, Worker interview				12/1/2006	1) Factory management has already submitted and posted the Disciplinary Policy on October 26, 2006. The new disciplinary procedure is in compliance with the local labor law. Article 87, chapter VII, which states that workers have the right to rely on the 280 days' probation period before any other disciplinary action. Factory must plan to retain all new disciplinary policy by December 2006. 2) Management to send the training record to adidas SEA once such is completed.	Pending	Update SOP dated on Nov-25-2006.	2) Training has been conducted for workers and supervisors on the new disciplinary procedure in January 2007. All training records are available at the factory. Factory plans to conduct the second training for the rest of 276 workers in May 11 (st week).					
Disciplinary Action: Punishment of Abusive Supervisors/Manager			Factory policy does not clearly state disciplinary measures for supervisors or for harassment and abuse behaviors.			Management interview, Worker interview, Record review					1) Factory management must ensure to create and implement a disciplinary policy for instances of harassment and abuse. This policy should apply to all workers, including supervisors and managers.	Completed	Established date is on November 14, 2006. Disciplinary measures against Supervisors for abuse harassment and Discrimination clearly included in Article 5 of the Factory Policy signed on June 22, 2006, and posted on bulletin board on July 1, 2006. Training to this policy had been conducted June 23 to July 6, 2006 with the participation of 885 workers.						
Record Maintenance	Chapter VII of Labor Code Decree 11/CP-1999 Decree 33/2003/ND-CP Circular 19/2003/TT-BLĐTĐXH		Disciplinary records and discipline are posted in public to embarrass workers posing a risk of psychological abuse.			Visual inspection, Worker interview, Management interview					Par factory visit, this practice has been removed and no longer is in use as of November 1, 2006.	Completed	Effective date is on November 1, 2006.						
<b>5. Nondiscrimination</b>																			
No person will be subject to any discrimination in employment, including hiring, salary, benefits, advancement, discipline, termination or reinstatement, on the basis of gender, race, religion, age, disability, sexual orientation, national origin, political conviction, or social or ethnic group.																			
<b>6. 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 as a result of the operation of employer's facilities.																			
Fire Safety, Health and Safety Legal Compliance	Labour Code, Article No. 87 Decree No. 06/CP dated 10/3/1999 going detailed instruction for the enforcement of occupational health and safety laws, Decree No. 12/DT-TT dated 10/24/1999 going instructions for the administration of occupational health, employees' health and occupational diseases.		Employer will comply with applicable health and safety laws and regulations. In any case where laws and codes of practice are contradictory, the higher standards will apply. The factory will possess all legally required permits.			Management interview, Visual inspection					2/1/2007	Due to industry risks where workers have to work with heavy/hazardous mechanical material, factory should employ one doctor to work during working hours.	Pending	Per local law: 14/1999/TT-BLĐTĐXH/TT-LĐ-VN dated 31 October 1999, Item 4.1.1. relating to management of number of Medical Staff with respect to the company with hazardous elements then the factory should: 1) one doctor and one nurse working shift for 500-1000 workers 2) Factory management has employed 1 physician (one physician per shift, 24 hrs) and one nurse (one nurse employed in March 2007) to assist the physicians. Additionally, the local clinic is located about 5 minutes from the factory by bus. The clinic is also an emergency resource for the factory.					
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 of different from the local language.			Visual inspection, Record review					1) Factory management must ensure factory has MSDS for all chemicals used and stored. 2) Factory management must ensure to post MSDS in local language in areas where chemicals are used and stored. 3) Chemical management training must be provided for all workers who handle chemicals twice a year or per schedule. 4) MSDS must be available to all workers.	Completed	MSDS and training record available in place.						
PPE	Article 101 of Labor Code "Employees who work dangerous or toxic jobs must be provided with sufficient personal protective facilities. The employer must ensure that all personal protective facilities meet the quality standards and criteria stipulated by law"	Workers shall wear appropriate protective equipment (goggles, eye protection, hearing protection, respiratory protection, etc.) to prevent occupational injury and illness. Personal protective equipment shall be provided to workers upon request, and shall be maintained in good condition. Personal protective equipment shall be replaced when damaged or worn out.	Workers using solvents are issued carbon masks, but these are not fitted and may not be effective. Extension ventilation has been installed since the test an test results, but further testing and evaluation is needed for verification and assessment of ventilation and PPE.			Visual inspection, Record review					3/1/2007	Axstone is the main chemical used by the factory, factory should measure the TLV of the workplace. If it measures more than 500 mg/m <sup>3</sup> (TLV), 500 mg/m <sup>3</sup> (TLV) at the factory should provide full face filter respirators for workers. If less than 500mg/m <sup>3</sup> , workers should be provided full face respirators that fully covers half of face by using the mist respirators to properly cover the nose. However the best solution is for the factory to improve engineering control by: 1) Improving a system of local and/or general exhaust to keep employee exposure below the Airborne Exposure Limits. 2) Improving local exhaust ventilation to control the emissions of the component of its source, preventing dispersion if it into the general work area. Please refer to the ACCF document, about Industrial Ventilation for details.	Pending	1) Environment assessment was done on January 17, 2007. No. 30/7B BV in which it was shown that there is some noise in the factory. 2) Aggressive noise workshop (from 90 to 100 Decibels). 3) Aggressive noise level in the factory. 4) Environment assessment was done on December 15, 2006 to verify chemical exposure.					
PPE	Article 101 of Labor Code "Employees who work dangerous or toxic jobs must be provided with sufficient personal protective facilities. The employer must ensure that all personal protective facilities meet the quality standards and criteria stipulated by law"	Workers shall wear appropriate protective equipment (goggles, eye protection, hearing protection, respiratory protection, etc.) to prevent occupational injury and illness. Personal protective equipment shall be provided to workers upon request, and shall be maintained in good condition. Personal protective equipment shall be replaced when damaged or worn out.	PPE for noise reduction not worn consistently. In some cases, workers were not wearing PPE. Supervisors should monitor the implementation of the policy. 2) Improve HSE performance mg. job description as a criteria in job performance of each employee. This could help employee take ownership in implementation of PPE policy. 3) Adapt PPE policy as needed. Set up training and report to adidas SEA lanes in March 2007.			Visual inspection, Record review					3/1/2007	3) Factory has provided and trained PPE policy for all workers, but awareness of some of the workers is not high. We will strengthen PPE implementation among workers.	Pending	1) and 3) Factory has conducted a PPE training for all workers in August 2006. 2) Factory has provided and trained PPE policy for all workers, but awareness of some of the workers is not high. We will strengthen PPE implementation among workers.					
Chemical Management for Pregnant Women and Juvenile Workers			To prevent unsafe exposure to hazardous chemicals, workers should be provided with appropriate protective equipment (goggles, eye protection, hearing protection, respiratory protection, etc.) to prevent occupational injury and illness. Personal protective equipment shall be provided to workers upon request, and shall be maintained in good condition. Personal protective equipment shall be replaced when damaged or worn out.			Management interview, Record review					3/1/2007	1) Factory management must ensure to develop a system for training pregnant workers and OT not assigned to those employees as per law. 2) Factory should assign one staff member to monitor the implementation of the policy. 3) Provide training to new workers and post policy in prominent area. 4) Pregnant workers' SOP should state that workers, after being pregnant, should inform HR through Program Confirmation Sheet. HR staff will follow up to let pregnant worker registration and inform production of transferring process for this worker to simple/light work or to keep control of working hours. 5. Maternity leave is decided by respective pregnant workers not by the factory.	Pending	Women's Right Policy dated on July 1, 2005.	Women's Right Policy of factory was available.				
Verification/Electrical Safety Maintenance			All ventilation, pumping, electrical, and lighting services shall be provided and maintained to conform to applicable laws and prevent hazardous conditions to employees in the facility.			Visual inspection, Government inspection					12/1/2006	Factory has to install more extraction systems in this area.	Pending	1) Factory already installed ventilation in this mixing tank. In addition, factory should improve the SOP to make the concerned workers to keep all the covers of chemical containers closed after using chemicals.					
Record Maintenance	Joint Circular No 14/2005/FLY-BLĐTĐXH-BYT-LĐLĐVN dated 08/30/2005		All safety and accident reports shall be maintained for at least one year, or longer, if required by law.			Insufficient records, Accident logs incomplete, Accident reports missing, Workers required for injuries were absent/unavailable.					12/1/2006	1) Factory management must ensure to maintain accident/OT records for all major and/or significant incidents in the factory. 2) Copy of accident logs must be maintained on factory premises. 3) In addition, adidas requires Factory to submit a monthly HSE performance which includes Accident/incident report for monitoring.	Pending	Air facility visit, there were insufficient records, Accident logs incomplete, and accident reports missing. Workers from accident logs requested for interview were absent/unavailable. Clinic always provides accident data to SOE. Appointment for visiting monthly accident reports and this record is completed in place for checking.					
Worker Participation	Joint Circular No 14/1998/FLY-BYT-BLĐTĐXH-LĐLĐVN dated 31 Dec 1998		Workers should be involved in planning for safety, including through worker safety committees.			Management interview, Record review					10/2007	HSE committee has been established in July 25, 2006, but it is not effectively operated. Factory is now based on adidas guidelines to set up a Safety Officer team.	Pending	HSE Committee had been established in May 2006 with 1 Chairman, 1 Vice Chairman and 1 Secretary, 15 supervisor representatives and 03 worker representatives from each department. Documentation of HSE monthly meetings, Quarterly factory inspection, corrective action plans, training, and worker feedback are available in place for verification (including 2 meeting minutes for November 2006 and January 2007, 2 inspectors for July and October 2006, etc.)					
Other			Environment test report from 2005 shows noise and VOC levels in excess of national standards. Factory has taken some actions to improve workplace and provide PPE, but improvements have yet to be verified by follow-up testing.			Management interview, Record review					10/2007	Factory is looking for reliable environmental validation service to test noise and VOC issues, an external local validation service does not have adequate equipment to do the testing. Expect to be completed by January 15, 2007.	Pending	Environment Test Result completed by Science and Technology Research Institute of City named on January 17, 2007 and found some areas to be non-compliant with local standards. Noise in Polishing Workshop: 80-100 dB(A) factory is in excess of range of PPE, engineering control. VOC from 42 to 88 mg/m <sup>3</sup> (N standard maximum limit is 30 mg/m <sup>3</sup> under the standard 31/2002/DT-BYT dated in October 10-2002/Chapter VII, part 3)					
<b>7. Freedom of Association and Collective Bargaining</b>																			
Employees will recognize and respect the right of employees to freedom of association and collective bargaining.																			
<b>8. Wages and Benefits</b>																			
Employees recognize that wages are essential to meeting employees' basic needs. Employees 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.																			
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.			Record review, worker interview					2/1/2007	1) Factory having voluntary OT registration process so it can be matched with compensation system. OT work must be properly recorded. 2) HR personnel must be trained on how to implement this system more strictly by updating daily OT registration. 3) Based on adidas requirement, factory will submit to SEA a monthly OT Tracking Chart in order to monitor factory's OT hours.	Pending	1) Check in/out of employees being tracked by computerized system. Only one record system is applied to both the counting workers' hours of work. 2) This list also has been issued to every worker that clearly states all working hours, OT, annual leave and absence.					



FLA Code/Compliance Issue	Country Law/Legal Reference	FLA Benchmark	EIM Findings					Remediation					Updates		Updates		Updates		Updates		Third-Party		
			Noncompliance	Risk of Noncompliance	Evidence of Noncompliance (Uncorroborated)	If Not Corroborated, Explain Why	Sources, Documentation Used For Corroborating	Notable Features	PC Internal Audit Findings (Optional)	PC Remediation Plan	Target Completion Date	Factory Response (Optional)	Company Follow Up (November and December 2006)	Documentation	Completed, Pending, Ongoing	Company Follow Up (March 2007)	Documentation	Completed, Pending, Ongoing	Company Follow Up (August 24, 2007)	Documentation		Completed, Pending, Ongoing	Company Follow Up (January 2008)
Record Maintenance		All compensation records will be maintained accurately and should be acknowledged by the employee as accurate.	Maintainers were shown several OT sign-up sheets, each to be used as a basis for calculating OT liability. However, only a few of these records were legible and were insufficient to confirm OT pay and workers' signatures were inconsistent and not verifiable.				Record review, Management interview	1) Factory should establish OT schedule (monthly or weekly) and post this schedule on notice board one week before if weekly (bi-weekly). 2) Supervisors should circulate OT sign-up sheet to workers for signature and submit to HR/OT of the factory. 3) The OT sign-up sheet should be sent back to the HR/OT department for updating and monitoring OT of each worker, and to ensure that OT is under strict control. 4) Set clear OT policy indicating that any supervisor signing OT on behalf of workers will be disciplined. 5) All OT work must be compensated in compliance with local law.	2/7/2007				Pending	4) Update OT standard has already been communicated to all employees. OT training was conducted January 2, 2007 with attendance of OT managers and supervisors. Based on disciplinary policy dated January 1, 2007, all supervisors of the plant are holding the OT policy by signing workers to work OT out of line set by the law will be disciplined.	Training record and Policy in place	Ongoing	From June 7-30, factory management held training on OT policy. Approximately 32 supervisors and 648 workers received the training.	Training box in place	Ongoing	5) All workers' OT records match with their payroll records, sweeping cards and the factory management is maintaining the proper hours of work/time recording records to properly compensate workers for all OT worked.	Randomly checked on last 3 months pay slip and payroll record in place	Ongoing	
Legal Benefits	Decision No. 1638LD/04-DQ	Employers will provide all legally mandated benefits to all eligible workers.	Workers performing heavy, hazardous, long jobs (i.e., polishing) are not accorded five months maternity leave and 14 days annual leave.				Management interview, Record review, worker interview	1) According to factory's CBA signed April 12, 2006, Article 9, workers in heavy/hazardous work entitled to take 14 days holiday leave, leave applied for maternity leave is not defined, indicating which job is entitled to have four or five months leave. Factory should adjust post and then for all workers.	2/7/2007			ESB No. 225, signed April 12-2006 and Local Hazardous/Heavy job available in place for checking	Pending	The Workers Policy (Article Report 4, dated Feb. 1, 2007) has adjusted maternity leave for pregnant workers in hazardous areas from four months to five months. Social Insurance Bureau in Province (Pinar) confirmed with factory that workers in the industry are classified as workers in hazardous work and are entitled to receive 14-day annual leaves according to labor code. Deadline for factory to adjust the policy is set on April 10, 2007.	Ongoing								
Legal Compliance for Holiday/Leave		Workers will be paid for holidays and leave as required by law.	Unused annual leave from 2005 was paid at 200% instead of 300% as required by law.				Management interview, worker interview, record review	Factory should update this policy accordingly based on Article 10, decree 114/2002/ND-CP of Labor Code	2/7/2007				Pending	1) Policy dated February 1, 2007 for annual leave leaves a 300% payment of unused leave for any worker who did not take full leave the previous year will be provided. 2) Deadline for payment will be set on February 28 of each year.	Ongoing								
Timely Payment		All compensation shall be paid in a timely manner.	In cases where workers are absent for one or more days, factory should workers' salary to verify means to be advance before making payment. This policy is not clearly defined, written down or communicated to workers.					This policy was stopped on November 1, 2006.	Immediately				Completed										
<b>8. Hours of Work</b>																							
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 base 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	Article 71 of the Labor Code In every week, each employee shall be entitled to a total of at least one day (24 consecutive hours). In special cases where, due to the production cycle, it is impossible to arrange weekly rest, it must be ensured that laborers shall have at least 4 rest days in a month. Article 69 of the Labor Code Circular No. 15/2003/TT-BLĐ-TXH dated 04/02/2003 The overtime must not exceed 4 hours a day, 16 hours a week, 14 hours in 4 consecutive days and 300 hours a year.	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 base 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.	Inconsistencies and discrepancies exist between OT hours on electronic time recording system, OT sign up and payroll. Maintainers cannot verify the accuracy of OT hours or compensation.				1) Factory should establish a clear process for OT records, all working hours and OT must be clearly stated in pay slip, monthly payroll, including Sunday work based on address BANGKOK, Thai (BASIC PAY TRANSPARENCY REQUIREMENTS) in chapter 1 of Labor Employment Guidelines. 2) Factory should submit to establish the ARF (Approval Request Form) for any Sunday work needed under a special circumstance.	2/7/2007					Pending	1) Monthly working hours have been sent to address for monitoring and factory has just attended the working hours training conducted by address SEA team. Factory SOE will implement a working hour policy following address guidelines. 2) Factory is requested to send the monthly OT schedule to address SEA to monitor working production hours to prevent factory from sweeping day on Sunday and using excessive OT.	Ongoing								
Overtime Limitations	Article 72 of the Labor Code In every week, each employee shall be entitled to a total of at least one day (24 consecutive hours). In special cases where, due to the production cycle, it is impossible to arrange weekly rest, it must be ensured that laborers shall have at least 4 rest days in a month. Article 69 of the Labor Code Circular No. 15/2003/TT-BLĐ-TXH dated 04/02/2003 The overtime must not exceed 4 hours a day, 16 hours a week, 14 hours in 4 consecutive days and 300 hours a year.	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 base 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.	Similarity work is not shown on payroll or interviews.				1) By law, for all Sunday work, factory must pay 200% plus one day off as compensation (without pay) or pay 100% plus Sunday work (i.e., plus one day compensation with pay). 2) At working days must be clearly defined in the payroll and pay slip, as well as the hours of work records. 3) Maintenance workers (and any other workers) when working on Sunday must record OT on time card and be paid OT accordingly by law (200%) based on Article 10, decree 114/2002/ND-CP of Labor Code.	2/7/2007					Pending	Based on Sunday work policy dated on January 1, 2007, Article 2.2.2. All workers who work on Sundays will receive 100% wages for the Sunday work, as well as an alternate paid day off.	Ongoing								
<b>10. Overtime Compensation</b>																							
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. In those countries where such laws will not exist, it is a rate at least equal to their regular hourly compensation rate.																							
Accurate Recording of OT Hours Worked		Employees will be paid for all hours worked in a work week. Calculation of hours worked must include all time that the employer allows or requires the worker to work.	Inconsistencies and discrepancies exist between OT hours on electronic time recording system, OT sign up and payroll. Maintainers cannot verify the accuracy of OT hours or compensation.				1) By law, for all Sunday work, factory must pay 200% plus one day off as compensation (without pay) or pay 100% plus Sunday work (i.e., plus one day compensation with pay). 2) At working days must be clearly defined in the payroll and pay slip, as well as the hours of work records. 3) Maintenance workers (and any other workers) when working on Sunday must record OT on time card and be paid OT accordingly by law (200%) based on Article 10, decree 114/2002/ND-CP of Labor Code.	2/7/2007					Pending	Pay slips have clearly recorded all OT working hours. All has been recorded in the computer system.	Completed								
OT Compensation	Article 61 of Labor Code Overtime work will be paid at least equal to 200% of basic holiday and rest days, with payment such as annual leave, marriage leave. Circular No. 14/2003/TT-BLĐ-TXH Where laborers work overtime but are arranged rest time as compensation thereof, enterprises and agencies shall only have to pay a 20% difference of the actual paid hourly wage of the performed job. 4 laborers work overtime at weekends, 200% of laborers work overtime on paid festive days or holidays.	The factory shall comply with applicable law for premium rates for overtime compensation.	Inconsistencies and discrepancies exist between OT hours on electronic time recording system, OT sign up and payroll. Maintainers cannot verify the accuracy of OT hours or compensation.				1) By law, for all Sunday work, factory must pay 200% plus one day off as compensation (without pay) or pay 100% plus Sunday work (i.e., plus one day compensation with pay). 2) At working days must be clearly defined in the payroll and pay slip, as well as the hours of work records. 3) Maintenance workers (and any other workers) when working on Sunday must record OT on time card and be paid OT accordingly by law (200%) based on Article 10, decree 114/2002/ND-CP of Labor Code.	2/7/2007					Pending	OT policy had been revised and complied with local regulation, in addition, 1) Monthly working hours have been sent to address for monitoring, and factory has just attended the working hours training conducted by address SEA team. Factory SOE will implement a working hour policy following address guidelines. 2) Factory is requested to send the monthly OT schedule to address SEA to monitor the working hours in production to prevent factory from sweeping day on Sunday and using excessive OT.	Ongoing								