

*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> |  |
| Country                  | India  |
| Factory Name             | 05003284D  |
| IEM                      | Bureau Veritas Consumer Products India Private Limited |
| Date(s) in Facility      | August 29 & 30, 2005                                   |
| PC(s)                    | Liz Claiborne, Inc.                                    |
| Number of Workers        | 1115   |
| Products                 | Woven Garments   |
| Production Processes     | Cutting to Packing                                     |

| FLA Code/ Compliance Issue   | Country/Legal Reference  | FLA Benchmark  | IEM Findings   |                        |   |                                  |  | Remediation   |                                       |                     |  |  | Target Completion Date | Factory Response (Optional) | Company Follow up (Cite date of follow up) | Documentation | (Status) Completed/ Pending/ On-going | Updates (Cite Date of Follow up) | Documentation | Third Party Verification (Date) | Company Verification Follow up (Cite date of planned or follow up visit, if appropriate) |
|--|--|--|--|------------------------|---|----------------------------------|--|---|---------------------------------------|---------------------|--|--|------------------------|-----------------------------|--|---------------|---------------------------------------|----------------------------------|---------------|---------------------------------|--|
|  |  |  | Non-Compliance   | Risk of Non-Compliance | Evidence of Non-compliance (uncorroborated) | If not corroborated, explain why | Sources/Documentation used for corroborating | Notable Features implemented by Factory Management or Company | PC Internal audit findings (Optional) | PC Remediation Plan |  |  |                        |                             |  |               |                                       |                                  |               |                                 |  |
| <b>1. Code Awareness</b><br>Code Posting/Information   |  | <b>FLA Principle of Monitoring, Obligation of Companies:</b> Establish and articulate clear, written workplace standards. Formally convey those standards to Company factories as well as to licensees, contractors and suppliers.   | <b>Non compliance</b><br>Factory is using offsite subcontract facilities for washing, printing, beading and hand embroidery As per factory management these contractors are approved and engaged by their head office, which is situated at a different location than the factory audited. Factory has not formally conveyed the COC to the subcontractors. Factory also engages contract workers inside the premise and those workers too are not trained on Clients COC. |                        |   |                                  | Interviews and Records maintenance           | None  |                                       |                     | PC has not worked with this vendor since end of 2004. PC has no plans on working with this vendor thus has limited leverage. |  |                        |                             |  |               |                                       |                                  |               |                                 |  |
| Worker/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 languages spoken by employees and managers) and undertake other efforts to educate employees about the standards on a regular basis. | <b>Non compliance</b><br>Factory is using offsite subcontract facilities for washing, printing, beading and hand embroidery As per factory management these contractors are approved and engaged by their head office, which is situated at a different location than the factory audited. Factory has not formally conveyed the COC to the subcontractors. Factory also engages contract workers inside the premise and those workers too are not trained on Clients COC. |                        |   |                                  | Interviews and Records maintenance           | None  |                                       |                     | PC has not worked with this vendor since end of 2004. PC has no plans on working with this vendor thus has limited leverage. |  |                        |                             |  |               |                                       |                                  |               |                                 |  |
| 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.                        | <b>Non compliance</b><br>There is no channel through which workers can inform about any non-compliance in the factory to NGOs / Company or FLA   |                        |   |                                  | Interviews and Records maintenance           | None  |                                       |                     | PC has not worked with this vendor since end of 2004. PC has no plans on working with this vendor thus has limited leverage. |  |                        |                             |  |               |                                       |                                  |               |                                 |  |
| <b>2. Forced Labor</b><br>There will not be any use of forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise.   |  |  | No Non-compliance Issues Found   |                        |   |                                  |  | None  |                                       |                     |  |  |                        |                             |  |               |                                       |                                  |               |                                 |  |
| <b>3. Child Labor</b><br>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.   |  |  |  |                        |   |                                  |  |   |                                       |                     |  |  |                        |                             |  |               |                                       |                                  |               |                                 |  |
| Age Documentation  | According to item 1(i) under schedule 1B of Industrial Employment (Standing Order) Central Rules 1946. (a) Every workman shall indicate his exact date of birth to the employer or the officer authorized by him in this behalf, at the time of entering service of the establishment.                             | Employers will maintain proof of age documentation for all workers, such as a birth certificate, which verifies date of birth.   | <b>Non Compliance</b><br>The factory employed some contract workers but the employment records are not available for these workers   |                        |   |                                  | Interviews and Records maintenance           | None  |                                       |                     | PC has not worked with this vendor since end of 2004. PC has no plans on working with this vendor thus has limited leverage. |  |                        |                             |  |               |                                       |                                  |               |                                 |  |
| Age-Verification   | According to item 1(i) under schedule 1B of Industrial Employment (Standing Order) Central Rules 1946. (a) Every workman shall indicate his exact date of birth to the employer or the officer authorized by him in this behalf, at the time of entering service of the establishment. The employer or the officer | In those cases where proof of age documentation is not readily available, employers will take precautions to ensure that all workers are at least the minimum working age, including medical or religious records, or other means considered reliable in the local context.  | <b>Non Compliance</b><br>Factory has employed some workers on contract basis but age proof records were not available for those workers  |                        |   |                                  | Interviews and Records maintenance           | None  |                                       |                     | PC has not worked with this vendor since end of 2004. PC has no plans on working with this vendor thus has limited leverage. |  |                        |                             |  |               |                                       |                                  |               |                                 |  |
| <b>4. Harassment or Abuse</b><br>Every employee will be treated with respect and dignity. No employee will be subject to any physical, sexual, psychological or verbal harassment or abuse.  |  |  | No Non-compliance Issues Found   |                        |   |                                  |  | None  |                                       |                     |  |  |                        |                             |  |               |                                       |                                  |               |                                 |  |
| <b>5. Nondiscrimination</b><br>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. |  |  | No Non-compliance Issues Found   |                        |   |                                  |  |   |                                       |                     |  |  |                        |                             |  |               |                                       |                                  |               |                                 |  |
| <b>6. Health and Safety</b><br>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  |  |  |  |                        |   |                                  |  |   |                                       |                     |  |  |                        |                             |  |               |                                       |                                  |               |                                 |  |
| Evacuation Procedure   | § Rule 61 (9a) of Tamil Nadu Factories rules 1950. 2 Rule 61 (9 f) of the Tamil Nadu Factories Rules 1950.   | All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, unblocked aisles/exits, employee education, evacuation procedures, etc.) shall be complied with and workers shall be trained in proper safety, first aid, and evacuation procedures   | <b>Non Compliance</b><br>1. Exits: The main doors of all the sections are opening inwards. The factory has provided latch at the backside of the doors as a precautionary measure, to keep it open during working hours<br>2. Handrails: In Building B, handrails were missing on the main staircases.   |                        |   |                                  | Visual Inspection                            | None  |                                       |                     | PC has not worked with this vendor since end of 2004. PC has no plans on working with this vendor thus has limited leverage. |  |                        |                             |  |               |                                       |                                  |               |                                 |  |
| <b>7. Freedom of Association and Collective Bargaining</b><br>Employers will recognize and respect the right of employees to freedom of association and collective bargaining  |  |  | No Non-compliance Issues Found   |                        |   |                                  |  | None  |                                       |                     |  |  |                        |                             |  |               |                                       |                                  |               |                                 |  |
| <b>8. Wages and Benefits</b><br>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                      |  |  |  |                        |   |                                  |  |   |                                       |                     |  |  |                        |                             |  |               |                                       |                                  |               |                                 |  |
| Minimum Wage   | 1-1 Notification No. 02/LEB/1094. Of Tamil Nadu Gazette part II (2) dt:23.2.1994.  | Employers will pay workers the legal minimum wage or the prevailing industry wage, whichever is higher   | <b>Indicator</b><br>All regular workers are paid minimum rate of wages in compliance with the local laws however it is not verifiable for contract workers as wage records for contract workers, working in the finishing section and hand embroidery section were not available. Also those workers were not in the factory during the audit for interview. Management claims that contract workers are paid minimum wages in accordance                                  |                        |   |                                  | Interviews and Records maintenance           | None  |                                       |                     | PC has not worked with this vendor since end of 2004. PC has no plans on working with this vendor thus has limited leverage. |  |                        |                             |  |               |                                       |                                  |               |                                 |  |
| Wage Benefits Awareness  | §2. Clause 4 of The Tamil Version of Factory's Approved Standing order   | 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  | <b>Indicator</b><br>Appointment letters are issued to all the workers employed directly by the factory but for contract workers this procedure could not be verified as records were not available with the factory. Also the contract workers in production were not present in the factory for verification of this procedure.   |                        |   |                                  | Interviews and Records maintenance           | None  |                                       |                     | PC has not worked with this vendor since end of 2004. PC has no plans on working with this vendor thus has limited leverage. |  |                        |                             |  |               |                                       |                                  |               |                                 |  |



