

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.

FINDINGS		REMEDATION						
FLA Code	FLA Compliance Benchmarks/Legal reference	Monitor's Findings	Date	Reebok Summary of Finding	Required Action and Comments	Factory Action Plan*	Documentation	Reebok Comments
6. Health and Safety								
Fire Safety Program								
	<p>FLA Compliance Benchmarks V. Health & Safety: All safety and medical equipment (such as fire fighting equipment, first aid kits, etc.) shall be in place, maintained as prescribed and accessible to the employees. OSHA Regulation 29 CFR Section 1910.157 - Portable Fire Extinguishers (c)(2) "The employer shall provide portable fire extinguishers and shall mount them, locate and identify them so that they are readily available to employees without subjection to possible injury."</p>	<p>Fire extinguishers - Fire extinguisher missing at OGM machines, fire extinguisher blocked in warehouse at loading door and fire extinguisher sign in the supply room is not visible and needs to be relocated. Supervisors are not trained in fire extinguisher usage.</p>	01-Jul-02	<p>FINDING: - Fire extinguishers missing at OGM machines. - Fire extinguisher blocked in warehouse at the loading door. - Fire extinguisher sign in the supply room is not visible. - Supervisors are not trained in fire extinguisher usage. - Fire alarm pull box at the north center back of the sewing area is blocked. - Exit light on the exit door located on the north wall of the sewing area is not working. - "Not an exit" sign is needed for the door of the janitor's supply room located in section C. - Evacuation diagram is not posted in the native language.</p>	<p>Factory must develop a fire safety program that includes:- - An assessment of fire safety needs - Planning for adequate and functional fire fighting equipment, evacuation routes and fire notification systems. - Training workers to respond quickly and responsibly in case of fire.</p> <p>As an immediate action step, factory must - Unblock access to the fire extinguisher in the warehouse and the fire alarm pull box in the sewing area. - Ensure that all fire safety signs are marked and clearly visible. - Post the evacuation diagram in the local language.</p>	<p>The factory developed a fire safety program, that planned for adequate and functional fire fighting equipment, evacuation routes and fire notification systems. Twenty-six fire extinguishers were placed throughout the factory after an assessment of fire safety needs. All fire extinguishers have been numbered and marked to ensure accessibility. Eighteen employees were trained on the use of the fire extinguisher, and ten also took and passed the "Fire Prevention & Safety" training. Training will be extended to all employees on an ongoing basis. On average, there are 3 evacuation drills, and all are timed and video taped. The last evacuation drill was held on 12/31/02. Evacuation maps are posted throughout the factory in English, Spanish and Mandarin.</p>	<p>Supporting documentation is maintained in Reebok's internal files</p>	<p>Reebok will continue to monitor the factories fire safety procedures and practices to determine continued compliance with a safe working environment.</p>
	<p>OSHA Regulation 29 CFR 1910.165(e) "Manual operation. The employer shall assure that manually operated actuation devices for use in conjunction with employee alarms are unobstructed, conspicuous and readily accessible."</p>	<p>Fire alarm pull box at the north center back of the sewing area is blocked.</p>				<p>The factory has unblocked access to the fire extinguisher in the warehouse and the fire alarm pull box in the sewing area.</p>		
	<p>OSHA Regulation 29 CFR Section 1910.37(q) "Exit marking" (1) "Exits shall be marked by a readily visible sign. Access to exits shall be marked by readily visible signs in all cases where the exit or way to reach it is not immediately visible to the occupants."</p>	<p>Exit light on the exit door located on the north wall of the sewing area is not working.</p>				<p>Exit light on the exit door located on the north wall of the sewing area has been fixed. All exits have been marked by a readily visible sign. Lights and exit signs will be checked every quarter to ensure are working in working condition.</p>		
	<p>FLA Compliance Benchmarks V. Health & Safety: 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. OSHA Regulation 29 CFR 1910.37(q)"Exit marking" (2) "Any door, passage, or stairway which is neither an exit nor a way of exit access, and which is so located or arranged as to be likely to be mistaken for an exit, shall be identified by a sign reading "Not an Exit" or similar designation, or shall be identified by a sign indicating its actual character, such as "To Basement," "Storeroom," "Linen Closet," or the like."</p>	<p>"Not an exit" sign is needed for the door of the janitor's supply room located in section C.</p>				<p>Exterior doors not being used as an exit, have a sign stating "Not an Exit." This was also posted in the janitor's supply room located in Section C.</p>		
	<p>FLA Compliance Benchmarks V. Health & Safety: 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. OSHA Regulation 29 CFR 1910.36 Means of Egress (b)(5) "Every exit shall be clearly visible or the route to reach it shall be conspicuously indicated in such a manner that every occupant of every building or structure who is physically and mentally capable will readily know the direction of escape from any point, and each path of escape, in its entirety, shall be so arranged or marked that the way to a place of safety outside is unmistakable. Any doorway or passageway not constituting an exit or way to reach an exit, but of such a character as to be subject to being mistaken for an exit, shall be so arranged or marked as to minimize its possible confusion with an exit and the resultant danger of persons endeavoring to escape from fire finding themselves trapped in a dead-end space, such as a cellar or storeroom, from which there is no other way out."</p>	<p>Evacuation diagram is not posted in the native language.</p>				<p>All evacuation maps are in Mandarin, Spanish and English</p>		

FINDINGS								
FLA Code	FLA Compliance Benchmarks/Legal reference	Monitor's Findings	Date	Reebok Summary of Finding	Required Action and Comments	Factory Action Plan*	Documentation	Reebok Comments
	FLA Compliance Benchmarks V. Health & Safety: 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. OSHA Regulation 29 CFR 1910.36 (b)(5) "Any doorway or passageway not constituting an exit or way to reach an exit, but of such a character as to be subject to being mistaken for an exit, shall be so arranged or marked as to minimize its possible confusion with an exit and the resultant danger of persons endeavoring to escape from fire finding themselves trapped in a dead-end space, such as a cellar or storeroom, from which there is no other way out."	Back men's with compressor exit door locked (door remains open but gate is locked and a sign states must remain open during business hours). The doors remain open and you can clearly see daylight, in an event of an emergency this gate can become a trap.		There is a door in the rear of the facility labeled "Men's Restroom" – this door leads to the men's restroom, as well as a room with a compressor. In this room with the compressor, there is a door marked "EXIT", however a locked gate (that must remain locked) blocks it. Because of the positioning of these various doors, daylight can clearly be seen in the factory floor, and this could easily be confused to be an exit during an emergency.	The "EXIT" sign from the door must be removed and a sign that the doors do not lead to an exit must be posted.	The sign, which stated "Must be unlocked during working hours" has been replaced by the sign stated "This is not an exit".	Pictures were submitted to Reebok for verification, and are maintained in Reebok's internal files.	
Binding Machine Needs Personal Protective Equipment (PPE) Sign	FLA Compliance Benchmarks V. Health & Safety: 1) All documents required to be available to workers and management by applicable laws (such as policies, MSDS, etc.) shall be made available in the prescribed manner and in the local language or language spoken by majority of the workers if different from the local language. 2) Workers shall wear appropriate protective equipment (such as gloves, eye protection, hearing protection, respiratory protection, etc.) to prevent unsafe exposure (such as inhalation or contact with solvent vapors, noise, dust, etc.) to hazardous elements including medical waste. 3) All production machinery and equipment shall be maintained, properly guarded, and operated in a safe manner.	The Binding machine needs a PPE sign and be marked (outlined) for heavy machine operation. This machine is located in the fabric storage building in the back of the complex.		The binding machine, located in the fabric storage building in the back of the complex, needs a PPE sign and needs to be marked (outlined) for heavy machine operation.	Install sign referencing the need to wear appropriate PPE.	Markings around the binding machine have been put down and a sign requiring the use of safety glasses has been posted.	Pictures of the sign requiring PPE have been submitted to Reebok, and are maintained in Reebok's files.	Reebok will work with the factory to determine whether the signs are sufficient to drive usage of the PPE or whether workers assigned to use hazardous materials need training on the dangers of the chemicals, when PPE is necessary, what PPE is necessary, and on the current use of the PPE, and their limitations.
No Lock Out-Tagout Procedures	FLA Compliance Benchmarks V. Health & Safety: All production machinery and equipment shall be maintained, properly guarded, and operated in a safe manner. OSHA Regulation 29CFR1910.147 The control of hazardous energy (lockout/tagout). (a) Scope, application and purpose– (1) Scope. (i) This standard covers the servicing and maintenance of machines and equipment in which the unexpected energization or start up of the machines or equipment, or release of stored energy could cause injury to employees. This standard establishes minimum performance requirements for the control of such hazardous energy.	No lockout-tagout procedures		No lockout-tagout procedure to control hazardous machines.	Machines in need of repair or service must be locked and tagged out of service by a qualified technician. Refer to Company production standards guide (Page 34) for detailed guidelines.	Printed tags have been posted on machines needing maintenance. The mechanic has also been given lock out tag out reusable cards, to ensure employees do not use machines.	Supporting documentation is maintained in Reebok's internal files	
PPE Usage	FLA Compliance Benchmarks V. Health & Safety: 1) Workers shall wear appropriate protective equipment (such as gloves, eye protection, hearing protection, respiratory protection, etc.) to prevent unsafe exposure (such as inhalation or contact with solvent vapors, noise, dust, etc.) to hazardous elements including medical waste.	Safety glasses not used when operating air hoses at the sewing machines. (And there is no training or identification to this effect for all the air hoses that they use and have located throughout the sewing machines.)		Safety glasses not used when operating air hoses at the sewing machines. Spot cleaner was not wearing safety glasses.	Factory must provide adequate protective personnel equipment where needed. In addition: - Post signs that say workers must wear safety glasses while operating air hoses and spot cleaning. - Maintain sufficient clean safety glasses on site.	All employees having to use the air hose and spot cleaning were issued safety glasses and signs have been posted in English, Spanish and Mandarin throughout the company on safety glass usage.	Pictures of the sign requiring PPE, and workers wearing PPE, have been submitted to Reebok, and are maintained in Reebok's files.	
	OSHA Regulation 29 CFR 1910.132(f) Training. "(1) The employer shall provide training to each employee who is required by this section to use PPE. Each such employee shall be trained to know at least the following: (i) When PPE is necessary; (ii) What PPE is necessary; (iii) How to properly don, doff, adjust, and wear PPE; (iv) The limitations of the PPE; and, (v) The proper care, maintenance, useful life and disposal of the PPE. (2) Each affected employee shall demonstrate an understanding of the training specified in paragraph (f)(1) of this section, and the ability to use PPE properly, before being allowed to perform work requiring the use of PPE. (3) When the employer has reason to believe that any affected employee who has already been trained does not have the understanding and skill required by paragraph (f)(2) of this section, the employer shall retrain each such employee."	Spot cleaner was not wearing safety glasses.		Spot cleaner was not wearing safety glasses.	Factory must provide adequate protective personnel equipment where needed. In addition, factory must post signs that say workers must wear safety glasses while operating air hoses and spot cleaning, and maintain sufficient clean safety glasses on site.	All employees having to use the air hose and spot cleaning were issued safety glasses and signs have been posted in English, Spanish and Mandarin throughout the company on safety glass usage.		
Hazardous Waste Storage	FLA Compliance Benchmarks V. Health & Safety: 1) All chemicals and hazardous substances should be properly labeled and stored in accordance with applicable laws. Workers should receive training, appropriate to their job responsibilities, in the safe use of chemicals and other hazardous substances. 2) All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with applicable laws.	Eight empty (50gal.) hazardous waste drums (acidic acid glacial, \$40.00 deposit) are stored in the yard-question it's existence. And upon further visual of the shipments heading out were marked as shipping from Mexico Plant. (containing [other companies] labeled garments) ----The management says that the empty acidic drums are held at there site for the Mexico Plant (xxxx) and waiting for pickup. And that the shipments for "Mexico Plant" are shipping from their site because they (factory) provide the distribution.		Eight empty (50gal.) hazardous waste drums are stored in the yard.	REQUIRED ACTION: Residual chemical is hazardous and should be promptly segregated and disposed of in accordance with all legal requirements.	[X] a hazardous wastes disposal company, has removed all the drums.	Supporting documentation is maintained in Reebok's internal files.	

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No Safety Policies	<p>FLA Compliance Benchmarks V. Health & Safety: 1) Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits. 2) All documents required to be available to workers and management by applicable laws (such as policies, MSDS, etc.) shall be made available in the prescribed manner and in the local language or language spoken by majority of the workers if different from the local language. 3) Workers should be involved in planning for safety, including through worker safety committees. OSHA Regulation 29 CFR Section 1926.21 Safety Training and Education the employer shall instruct each employee in the recognition and avoidance of unsafe conditions and the regulations applicable to his work environment to control or eliminate any hazards or other exposure to illness or injury. We have noted no safety training or education is provided in the factory</p>	Factory does not have machinery, equipment, chemical safety and fire safety policies and procedures		Factory does not have machinery, equipment and chemical safety policies and procedures.	Factory must demonstrate that it has developed policies and procedures regarding the safe use and maintenance of machinery and equipment and the safe use of chemicals.	Factory is currently developing policies regarding the safe use of machinery. The employee handling the cleaning solution has been informed of what PPE is required and the same has been provided. The employee's supervisor was informed spot cleaners of the non-toxic solution. The Materials Safety Data Sheet was explained in Mandarin to the employees and a copy is posted at the workstation.		Reebok will continue to monitor the factory's progress in developing and implementing policies and procedures regarding the safe use and maintenance of chemicals, and machinery and equipment.
MSDS Needed	<p>FLA Compliance Benchmarks V. Health & Safety: All documents required to be available to workers and management by applicable laws (such as policies, MSDS, etc.) shall be made available in the prescribed manner and in the local language or language spoken by majority of the workers if different from the local language. OSHA Regulation 29 CFR 1910.1200 Hazard Communication (b)(4)(ii) "Employers shall maintain copies of any material safety data sheets that are received with incoming shipments of the sealed containers of hazardous chemicals, shall obtain a material safety data sheet as soon as possible for sealed containers of hazardous chemicals received without a material safety data sheet if an employee requests the material safety data sheet, and shall ensure that the material safety data sheets are readily accessible during each work shift to employees when they are in their work area(s)"</p>	A MSDS is needed for the spot cleaning liquid used at the spot cleaning booth.				The Materials Safety Data Sheet was explained in Mandarin to the employees and a copy is posted at the workstation.		
Electrical Safety	<p>FLA Compliance Benchmarks V. Health & Safety: All ventilation, plumbing, electrical, and lighting services shall be provided and maintained to conform to applicable laws and prevent hazardous conditions to employees in the facility. OSHA Regulation CFR 1910.304 "Electrical Safety, the path to ground from circuits, equipment and enclosures must be permanent and continuous."</p>	Open wiring in the back men's room by the compressor				Open wiring in the back men's room by the compressor has been properly and safely covered.		Correction was verified by Reebok's Q.C.
Use of Personal Electronics	<p>FLA Compliance Benchmarks V. Health & Safety: All ventilation, plumbing, electrical, and lighting services shall be provided and maintained to conform to applicable laws and prevent hazardous conditions to employees in the facility. OSHA Regulation 29 CFR 1910.305 Wiring methods, components, and equipment for general use, (g)(1)(iii)(a) flexible cords and cables may not be used as a substitute for the fixed wiring of a structure, (b) where run through holes in walls, ceilings, or floors, (c) where run through doorways, windows, or similar openings, (d) where attached through doorways, windows, or similar openings, (d) where attached to building surfaces, and (e) where concealed behind building walls, ceilings, or floors.</p>	In the employee hand book it states no personal electronics are to be plugged into outlets, but a few employees use personal fans plugged into multi-outlet plugs.				Employees have been informed that no personal electrical equipment can be plugged in to machine.		

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FLA Code	FLA Compliance Benchmarks/Legal reference	Monitor's Findings	Date	Reebok Summary of Finding	Required Action and Comments	Factory Action Plan*	Documentation	Reebok Comments
No Worker Representative on Safety Committee	FLA Compliance Benchmarks V. Health & Safety: Workers should be involved in planning for safety, including through worker safety committees.	No worker elected representative for safety committee.		No worker elected representative in the safety committee.	A worker representative must be elected to the safety committee immediately.	Currently, no worker has volunteered to participate in the committee. The factory is working on motivating workers to become a member of the Safety Committee. A bonus will be offered to participate as a worker representative.		
Housekeeping	FLA Compliance Benchmarks V. Health & Safety: 1) 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. 2) All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with applicable laws. OSHA Regulation 29 CFR 1910.22(a) "Housekeeping." (1) "All places of employment, passageways, storerooms, and service rooms shall be kept clean and orderly and in a sanitary condition."	The parking lot is controlled, but blocked due to overcrowded parking condition.		The factory parking lot is blocked due to overcrowded parking conditions. This could potentially trap people trying to leave the lot in an emergency.	Develop a plan to expand or re-design the existing parking lot to address the overcrowded situation.	To reduce the overcrowded parking conditions, factory management is offering travel reimbursement to workers who take public transportation or car pool. A security guard has also been placed to maintain the parking lot in order.		
	FLA Compliance Benchmarks V. Health & Safety: All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with applicable laws. OSHA Regulation 29 CFR 1910.22 (a) "Housekeeping." (1) "All places of employment, passageways, storerooms, and service rooms shall be kept clean and orderly and in a sanitary condition."	The sewing machine work area is cluttered with work product		Sewing machine work area is cluttered with work product.	Factory must maintain a clear passageway of at least 60cms leading to and from the workstation, either to the side or behind the worker. Individual workstations should never be blocked by work-in-progress such that it is difficult to leave in an emergency.	The work aisles have been cleared of unused cartons. Sections have been rearranged to provide 73 inches between sewing machines. Workers have been educated on how best to store work-in-progress material so that it does not block their exit in the event of an emergency.	Supporting documentation is maintained in Reebok's internal files	
	FLA Compliance Benchmarks V. Health & Safety: All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with applicable laws. OSHA Regulation 29 CFR 1910.22(a) "Housekeeping." (1) "All places of employment, passageways, storerooms, and service rooms shall be kept clean and orderly and in a sanitary condition. (3) To facilitate cleaning, every floor, working place, and passageway shall be kept free from protruding nails, splinters, holes, or loose boards.	Standing pallets are stored in the yard.		Standing pallets are stored in the yard.	Standing pallets are not stable and could easily fall over. Factory must ensure that all pallets are stored flat.	Factory management informed all personnel handling the pallets about the safety issues in storing them. They were asked to sign a form, in their native language, stating they understood the training.	Supporting documentation is maintained in Reebok's internal files	
Emergency Medical Care	FLA Compliance Benchmarks V. Health & Safety: 2) All safety and medical equipment (such as fire fighting equipment, first aid kits, etc.) shall be in place, maintained as prescribed and accessible to the employees. OSHA Regulation 29 CFR 1910.151 Medical Services and First Aid (b) "In the absence of an infirmary, clinic, or hospital in near proximity to the workplace which is used for the treatment of all injured employees, a person or persons shall be adequately trained to render first aid. Adequate first aid supplies shall be readily available." No medical facilities for common injuries. 29 CFR 1910.151 Medical Services and First Aid. (b) In the absence of an infirmary, clinic, or hospital in near proximity (3-4 minutes) to the workplace which is used for the treatment of all injured employees, a person or persons shall be adequately trained to render first aid. Adequate first aid supplies shall be readily available.	The conference room had a first aid sign over the door, however there was not a first aid kit inside. No medical facilities for common injuries.		The conference room has a first aid sign over the door, however there was no first aid kit inside. In addition, there are no medical facilities for common injuries.	Medical facilities on factory grounds are not required, but factory must ensure sufficient persons are on staff who are trained to render first aid. Factory must ensure that the first aid kits must be stocked and accessible to workers. If the kit is stored in another location then remove the sign from the conference room door and post it in the new location and communicate it to the workers.	The sign over the door, which stated "First Aid" has been removed and posted in its proper place. Also, three first aid kits have been made available for workers, and 12 employees have been certified as first aid responders with CPR training.	Supporting documentation is maintained in Reebok's internal files	
7. Freedom of Association and Collective Bargaining								
8 Wages & Benefits								
Wage rates	FLA Compliance Benchmarks VII. Wages and Benefits, Hours of Work, and Overtime Compensation: 1) Employers will pay workers the legal minimum wage or the prevailing industry wage, whichever is higher. 2) Workers paid on the basis of incentive quotas will be paid not less than the minimum or prevailing wage, whichever is higher. 3) Regardless of any production quotas, incentives will not be reduced or unpaid if the result will be wages below the minimum wage.	When not actively working, such as during machine downtime, health and safety meetings, fire drill training or interviews, workers are only paid their guaranteed minimum wage, not the prevailing wage they normally receive while working piece rate.		During machine downtime, health meetings, fire drills, workers are only paid their guaranteed minimum wage, not the prevailing wage they normally receive while working piece rate.	Company requires that workers be paid, at the very least, minimum wage as compensation when not actively working. We find the factory in compliance with this requirement.			

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Wage and hour documentation	FLA Compliance Benchmarks VII. Wages and Benefits, Hours of Work, and Overtime Compensation: All compensation records will be maintained accurately and should be acknowledged by the employee as accurate.	Some employees are required to work at another factory besides the addressed factory. There are no documented explanation of how employees are compensated for the piece rate, overtime, training and machine down time.	01-Aug-02	Some workers are required to work at another factory besides [this factory]. There is no documented explanation of how they are compensated for the piece rate, overtime, training and machine down time.	Communicate verbally and in writing to all workers, in their own language, its policy on wages, incentive systems and bonuses. Provide access to workers information about their wages and benefits.	All workers work for this factory which has two locations. A memo was issued in August 2002, to all employees, to educate them that they work for [this factory], as well as how the factory determines wages, benefits and incentive systems. The memo also outlined for those workers paid by piece rate, the piece rate calculations and that they would receive minimum wage when attending meetings or trainings.	A copy of the memo was submitted to Reebok for verification, and is maintained in Reebok's internal files.	
Piece rate calculation system	FLA Compliance Benchmarks VII. Wages and Benefits, Hours of Work, and Overtime Compensation: 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.	Workers reported that piece rate is not formally down in writing and changes casually without the knowledge of the workers; there is no formal piece rate calculation system.		There is no formal piece rate calculation system. It changes without consultation with the workers.				
Unaware of Benefits	FLA Compliance Benchmarks VII. Wages and Benefits, Hours of Work, and Overtime Compensation: In general, workers will have access to understandable information about their wages and benefits, and will not express dissatisfaction with their ability to get information.	Workers reported that they are unaware of unemployment benefits.		Workers were not all informed about factory policy and labor laws relating to unemployment benefits, paid holiday and vacation time.	Factory management must inform all workers of their benefits. It must provide this information when a worker starts employment. For existing workers, the factory must conduct a training session to address the same.	Workers are provided a copy of Factory's policies and rules at the start of employment. Each worker signs the document acknowledging consent. Copies of the policies and rules are available, on demand, to all workers. Additionally, the Personnel Manager is available on site to clarify worker questions.	Supporting documents are maintained in Reebok's internal files.	
No Holiday/Vacation Time	FLA Compliance Benchmarks VII. Wages and Benefits, Hours of Work, and Overtime Compensation: 1) Employers will provide all legally mandated benefits to all eligible workers. 2) Legally mandated benefits will be provided or paid in full within legally defined time periods. 3) Workers will be paid for holidays and leave as required by law.	Workers report that they receive no paid holiday or vacation time, as well as no benefits besides unemployment.			Factory management must pay all legally required benefits are paid to workers.	Any employee who is terminated or laid off is informed about unemployment benefits.		
9. Hours of Work								
Working Hour Limit	FLA Compliance Benchmarks VII. Wages and Benefits, Hours of Work, and Overtime Compensation: Except in extraordinary business circumstances, employees will (i) not be required to work more than the lesser of (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture or, where the laws of such country will not limit the hours of work, the regular work week in such country plus 12 hours overtime; and (ii) be entitled to at least one day off in every seven day period. An extraordinary business circumstance is a temporary period of extra work that could not have been anticipated or alleviated by other reasonable efforts.	Note that there normal business usually runs 54 to 58 hours for their employees working hours				The factory maintains strict compliance with Reebok's 60-hour workweek standard, and is looking to reduce hours to the 48 hour standard.	Supporting documents are maintained in Reebok's internal files.	
10. Overtime Compensation								
OT Compensation	FLA Compliance Benchmarks VII. Wages and Benefits, Hours of Work, and Overtime Compensation: All compensation records will be maintained accurately and should be acknowledged by the employee as accurate.	The employees are only paid up to minimum for all down time (such as trainings, meetings, drills); some employees are required to work at another factory besides the addressed factory. There are no documented explanation of how employees are compensated for the piece rate, overtime, training and machine down time. The employee's overtime compensation would not be reflective of their true earnings.				Employees have been informed that they will receive the minimum wage when attending trainings or meetings. Timecards and payroll accurately reflect all hours worked by employees, and that they are properly compensated accordingly.	Supporting documents are maintained in Reebok's internal files.	