

Sedex Members Ethical Trade Audit Report



Audit Details								
Sedex Company Reference: (only available on Sedex S		292273895	Sedex Site Reference: (only available on Sedex System)			ZS310762197		
Business name (Conname):	npany BES	SLI TEKSTIL SAN	N TIC L	TD STI				
Site name:	BES	SLI TEKSTIL SAN	NAYI V	E TICARET LII	MITEI	O SIRKE	ГΙ	
Site address:	HAI NO: ESE IST.	OSMANGAZİ MAH. HADIMKÖY YOLU CAD. NO:66 ESENYURT İSTANBUL 34522 TR			TR			
Site contact and job t	itle: PAS	SALI BESLI / FAC	CILITY	OWNER				
SMETA Audit Pillars:	V	Labour Standards Health and Safety (plus Environment 2-Pillar)			Environment Business 4-pillar Ethics		Business Ethics	
Date of Audit:	202	3-02-08						
		Aud	it Comp	pany Name:				
			Intertek	Turkey				
Audit Conducted By								
Affiliate Audit Company	2	Purchaser				Retailer		
Brand owner		NGO		Trade U		nion		
Multi-stakeholder			Combined Audit (select all that apply)					

Audit company: Intertek Turkey Report reference: ZAA600003506

Start Date: 2023-02-08

End Date: 2023-02-08

Audit Content:

SMETA

- (1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 (March 2019) was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.
- (2) The audit scope was against the following reference documents

2-Pillar SMETA Audit

- ETI Base Code
- SMETA Additions
 - Universal rights covering UNGP
 - Management systems and code implementation,
 - Responsible Recruitment
 - · Entitlement to Work & Immigration,
 - Sub-Contracting and Home working,

4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)
- (3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

SMETA Declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Best Practice Guidance and SMETA Measurement Criteria.

- (1) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (2) Any Non-Compliance against customer code alone shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

Auditor Team						
Lead Auditor:	CEREN AKKURT	APSCA Number:	21704506			
Additional Auditors:	EMRE AKDEMIR					
Date of declaration:	2023-04-06					

Note: The focus of this ethical audit is on the ETI Base Code and local law. The additional elements will not be audited in such depth or scope, but the audit process will still highlight any specific issues.

Site Representation					
Full Name:	PASALI BESLI				
Title:	FACILITY OWNER				
Date of declaration:	2023-04-06				
Comments:					

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Summary of Findings

Issue	Area of Non–Conformity		Nui	mber of iss	ues	Findings
(please click on the issue title to go direct to the appropriate audit results by clause)	ETI	Local Law	NC	Obs	GE	
0A - Universal rights covering UNGP			0	0	0	
0B - Management systems and code implementation	0.B.4	§1	1	0	0	NC - ZAF600019042
1 - Freely chosen employment			0	0	0	
2 - Freedom of association and right to collective bargaining are respected			0	0	0	
3 - Working conditions are safe and hygienic	3.1 3.1 3.2	§2 §3 §4	3	0	0	NC - ZAF600019043 NC - ZAF600019044 NC - ZAF600019045
4 - Child labour shall not be used			0	0	0	
5 - Living wages are paid			0	0	1	GE - ZAF600019046
6 - Working hours are not excessive	6.1	§5	1	0	0	NC - ZAF600019041
7 - No discrimination is practiced			0	0	0	
8 - Regular employment is provided			0	0	0	
8A - Subcontracting and homeworking			0	0	0	
9 - No harsh or inhumane treatment is allowed			0	0	0	
10A - Entitlement to work and immigration			0	0	0	
10B2 - Environment 2-pillar	10.B2.1	§6	1	0	0	NC - ZAF600019040
10B4 - Environment 4-pillar			0	0	0	
10C - Business ethics 4-pillar			0	0	0	

Local Law Issues

Issue	Description
	Regulation for facility opening and operating permit (10/8/2005), II. Section Art 6 (Changed first clause: 19/3/2007 – 2007/11882 K.) – It is not allowed that the facility are not opened and operated without "Opening and Operating Permit" that is taken from local authorities properly.

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§2	In accordance with The Turkish Regulation for Occupational Health and Safety Method and Elements for Employees (15.05.2013), art 6, (1)The employer should provide the health and safety trainings which also include the topics in Appendix 1. (2)The employer should provide the training which includes the occupation, risks special to facility and protection measure before employee start the occupation. (3)Besides the training which includes the risk while changing the profession or workplace, changing the equipments used in the Occupation, application of the new technology (4)The training which is given according to Paragraph 1 should be renewed due to changing and newly appeared risks and if necessary, it should be repeated periodically. a-)At least once a year for facilities in very hazard class b-)At least twice a year for facilities in hazard class c-)At least three times a year for facilities in less hazard class (5)Additionally, training about the reasons for accident or occupational illness, protection methods and safely working methods should be given to employees who had occupational accident or occupational illness. (6) Training should be given to employees who could not work more than 6 months due to any reason before employee start the occupation again.
§ 3	In accordance with Turkish Regulation about Occupational Health and Safety circumstances using work equipments (25/04/2013) No: 28628 Addition III - Related Matters for Maintenance, Repairs and Periodical Checks Art 2.2.3 Periodical check period and check criteria for lifting and transfer tools are stated on Table 2 provided that the criteria stated in Art 2.1.1 are reserved. Table 2 Equipment: Lift(Man lift, Goods Lift), Forklift, Transpallet, Lifting or transferring tools Check Period(Max): 1 year Art.1.9. In case when non-compliance points are detected in terms of occupational health and safety and operating of the work equipment is inappropriate if these points are not corrected; the work equipment shall not be used until these points are corrected.
§4	The Regulation On the Health and Safety Measures Taken for the Buildings and Additions (17.07.2013, No: 28710) Appendix-1 Minimum Health and Safety Requirements for Buildings and Additions Emergency Exit Routes and Doors 10 - a) All emergency exit routes and doors at workplaces are opened directly outside or a safety area and shall not be any obstacle in front of or behind them to avoid escaping. 10 - ç) All emergency exit doors are opened immediately and easily by employees in emergency cases. These doors are opened outward. Railing and revolving doors can not be used as emergency exits. 10 - d) There shall not be any obstacle that makes difficult to evacuate at emergency exit routes and doors, and on routes and exits which leading to emergency exit routes and doors. Emergency exit doors shall not be locked or conditioned by any material. 10 - e) All emergency exit routes and doors shall be marked properly in accordance with Regulation on Safety and Health Signs (date: 23/12/2003, No: 25325). Signs shall be placed at proper places and be permanent.
§5	In accordance with the Turkish Regulation on Working Hours Related to Labor Law, art 4 In general the duration of work shall be at the most 45 hours a week. This period shall be applied by dividing equally among the days of the week worked, unless the opposite is concluded. Daily working hours shall not be exceeded 11 hrs a day in any case.
§6	Regulation about the obligatory permits and licenses according to the Environment Law(29.04.2009) No: 27214, Article 4; facilities subject to environment permit or to environment permit and license are classified as below regarding to their impact to environment; 1- Facilities which have contaminating impact to environment at high level (Appendix 1) 2- Facilities which have contaminating impact to environment (Appendix 2) Facilities which listed at Appendix 1 or 2 are required to obtain environment permit or to environment permit and license.

Site Details

	Site Details					
Company Name	BESLI TEKSTIL SAN TIC LTD STI					
Site Name	BESLI TEKSTIL SANAYI VE TICARET LIMITED SIRKETI					
GPS location (if available)	GPS Address:			OSMANGAZI MH HADIMKOY YOLU CD. NO:66 ESENYURT		
	Coordinates:		41°03'17.4	I"N 28°37'41.3"E		
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	There is no operating	and openin	g business	license. (NC)		
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	OUTWEAR GARMEN ironing, packaging.	ITS . Main p	rocesses a	re sewing, cutting and		
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	BESLI TEKSTIL SAN. VE TIC. LTD.STI. was established in 2008 Istanbul and operates at the current address since 2022 December. The facility has a 4400 sqm closed area. The building is concrete.					
Structure and number of buildings	Building Name:		Building 1			
	Floor	Description	า	Remark		
	Floor -1	ce Floor Warehouse, cutting None		None		
	Entrance Floor			None		
	Floor 1			None		
	Floor 2 Lunch Hall			None		
	Floor 3	Offices,Do	ctor Room	None		
Visible structural integrity issues (large cracks) observed?	☐ Yes ☑ No Please give details:					
	No cracks were obser	ved				
Does the site have a structural engineer evaluation?	☑ Yes □ No					
evaluation:	Please give details:					
	The company had a building structure construction permit that ensures the building had the aseismic design in terms of architectural science.					
Site function	☐ Agent			y ssing/Manufacturer		
	☐ Finished Product	Supplier	□ Growe	er		
	☐ Homeworker		□ Labou	r Provider		
	□ Pack house		□ Prima	ry Producer		
	☐ Service Provider		□ Sub-c	ontractor		
Months of peak season						

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Process overview	The main processes are sewing, cutting, ironing and packaging. There are 3 sewing lines, 120 sewing machines, 24 ironing equipment, 8 cutting machines, 1 compressor and 1 generator are the main equipment.				
What form of worker representation is there	☐ Union ☐ Worker Commitee				
on site?	☑ Other □ None				
Please give details:	Open door policy, worker representatives and suggestion boxes				
Is there any night production work at the site?	☐ Yes ☑ No				
Are there any on site provided worker accommodation buildings	☐ Yes ☑ No				
3	Please give details:				
Are there any off site provided worker accommodation buildings	□ Yes ☑ No				
3	Please give details:				
Were all site provided accommodation buildings included in this audit	□ Yes ☑ No				
3	Please give details:				
	There is no accommodation in the facility				

Audit Parameters						
Time in and time out	Day 1					
	In	09:00				
	Out	17:00				
Audit type:	FULL_INITIAL					
Was the audit announced?	SEMI_ANNOUNCED					
Was the Sedex SAQ available for review?	Yes					
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No					
Who signed and agreed CAPR	PASALI BESLI / FACILITY OWNER					
Is further information available	No					

Audit attendance	Management	Worker Representatives				
	Senior management	Worker Committee representatives	Union representatives			
A: Present at the opening meeting?	Yes	Yes	No			
B: Present at the audit?	Yes	Yes	No			
C: Present at the closing meeting?	Yes	Yes	No			
Reason for absence at the opening meeting	There is no union in the facility.					
Reason for absence during the audit	There is no union in the facility.					
Reason for absence at the closing meeting	There is no union in the fac	There is no union in the facility.				



Worker Analysis

The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity.

Version 6.1

	Worker Analysis							
		Local			Migrant*		Home	
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	workers	Total
Worker numbers – male	68	0	0	15	0	0	0	83
Worker numbers – female	74	0	0	0	0	0	0	74
Total	142	0	0	15	0	0	0	157
Number of Workers interviewed – male	14	0	0	0	0	0	0	14
Number of Workers interviewed – female	12	0	0	0	0	0	0	12
Total – interviewed sample size	26	0	0	0	0	0	0	26

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	Nationalities Structure						
Nationality of Management	Turkish						
Please list the nationalities of all workers,	Nationaility 1: Turkish	approx %: 90%					
with the three most common nationalities listed first.	Nationaility 2: Syrian	approx %: 10%					
Was this list completed during peak season?	☐ Yes ☑ No						
season:	Please give details:						
	There is no such peak season.						
Worker remuneration	Workers on piece rate:	0%					
	Paid hourly:	100%					
	Salaried:	0%					
Payment cycle	Paid daily:	0%					
	Paid weekly:	0%					
	Paid monthly:	100%					
	Other:	0%					
	Details for other:	N/A					

Worker Interview Summary		
Were workers aware of the audit?	☑ Yes □ No	
Were workers aware of the code?	☑ Yes □ No	
Number of group interviews:	4 groups of 5	
Number of individual interviews:	Male: 3 Female: 3	
All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors.	☑ Yes ☐ No Please give details:	
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	☑ Yes □ No	
In general, what was the attitude of the workers towards their workplace?	☑ Favorable ☐ Non-favourable ☐ Indifferent	
What was the most common worker complaint?	None	
What did the workers like the most about working at this site?	Payment on time, management attitude	
Any additional comment(s) regarding interviews:	None	
Attitude of workers to hours worked:	They are pleased of working hours	
Is there any worker survey information available?	☐ Yes ☑ No Please give details:	

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Attitude of workers:

The general attitude of the employees was positive. Social insurance and payment on time were the positive issues raised by the employees. There is no discrimination, harassment, abuse or forced labour.

Attitude of worker's committee/union reps:

No negative comment was noted during the worker representative interview.

Attitude of managers:

Management was cooperative during the audit process.

0A - Universal Rights covering UNGP [Summary of Findings]

0A: Compliance Requirements

- 0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.
- 0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights

0.A.3 Businesses shall identify their stakeholders and salient issues.

- 0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.
- 0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.
- 0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter. Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

Current Systems and Evidence Examined
To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.
Current Systems:
Documented procedures are established and communicated on notice boards and trainings. The responsible person from the management system is SIBEL CIRAK – HUMAN RESOURCES RESPONSIBLE The facility has grievance mechanism for all partners.
Evidence examined:
Management interview Employees' interviews
Any other comments:
None

Policy statement that expresses commitment to respect human rights?	☑ Yes □ No
·	Please give details:
	The facility has a detailed social compliance policy that includes human rights.
Are the policies included in workers' manuals?	☑ Yes □ No
mandale.	Please give details:
	The facility has a detailed social compliance policy that includes human rights included in manuals.
Does the business have a designated person responsible for implementing standards concerning Human Rights?	☑ Yes □ No
	Please give details:
	Name: SIBEL CIRAK Job title: HUMAN RESOURCES RESPONSIBLE
Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts	☑ Yes □ No
	Please give details:
without fear of reprisals towards the reporter?	The facility has suggestion boxes placed at several places.

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	I	
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	☑ Yes □ No	
Does the business demonstrate effective data privacy procedures for workers'	☑ Yes □ No	
information, which is implemented?	Please give details:	
	The facility has detailed privacy p information such as personnel file feedbacks getting from suggestio management in a confidential way	e, labour contract. Also, the n boxes are evaluated by the
Me	asuring Workplace Impact	
Annual worker turnover(Number of workers	Last year	2%
leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	This year	7%
Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	7%	
Annual % absenteeism(Number of days lost	Last year	3%
through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	This year	5%
Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month)	5%	
Are accidents recorded?	☑ Yes □ No	
	Please give details:	
	Accidents are recorded, records h	nave been seen.
Annual Number of work related accidents	Last year	0%
and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	This year	0%
Quarterly (90 days) number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	0%	
Lost day work cases per 100	Last year	0%
workers([(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	This year	0%

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% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month 12 month	0% 0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month 12 month	0% 0%

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OB - Management Systems and code Implementation [Summary of Findings]

0B: Compliance Requirements

- 0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.
- 0.B.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.
- 0.B.3 Suppliers are expected to communicate this Code to all employees.
- 0.B.4 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with.
- 0.B.5 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current Systems:

The facility has disciplinary procedures and work rules. All posted onsite.

All social compliance issues are managed and monitored internally.

The facility management has already posted ETI Base code on notice boards.

The facility has its own documented social policy that covers all issues mentioned in ETI Base Code. Overall responsibility for meeting the standards is taken by the SIBEL CIRAK / HUMAN RESOURCES RESPONSIBLE

Evidence examined:

- Management interview
- Employees' interviews
- Training records
- Company policies

None

	Management Systems
In the last 12 months, has the site been subject to any fines/prosecutions for non–compliance to any regulations?	☐ Yes ☑ No
	Please give details:
	N/A
Do policies and/or procedures exist that reduce the risk of forced labour, child	☑ Yes □ No
labour, discrimination, harassment & abuse?	Please give details:
	Policies and procedures about reduce the risk of forced labour, child labour, discrimination and harassment & abuse are available.

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If Yes, is there evidence (an indication) of effective implementation? Please give details.	Policies exist for all areas (Forced labor, Health and Safety, Wages, Working Hours, and No harsh treatment, Environment, Business Ethics, Child Labour, Recruitment, Discrimination and Sub- contracting.). These are communicated to workers via posters.
	Through documents review and workers' interviews, policy on 'No harsh treatment and Environment' was fully in compliance with the code.
	In addition; workers stated that no forced labor, no child labor was found in the facility (interview and document checks), there were both female and male among management/supervisors.
Have managers and workers received	☑ Yes □ No
training in the standards for forced labour, child labour, discrimination, harassment &	Please give details:
abuse?	These policy and procedures are communicated to the all staff through posters.
If Yes, is there evidence (an indication) that training has been effective e.g. training	☑ Yes □ No
records etc.? Please give details	Please give details:
	Tranining records are available.
Does the site have any internationally recognised system certifications e.g. ISO	☐ Yes ☑ No
9000, 14000, OHSAS 18000, SA8000 (or	Please give details:
other social audits)?	N/A
Is there a Human Resources manager/department?	☑ Yes □ No
	SIBEL CIRAK / HUMAN RESOURCES RESPONSIBLE
Is there a senior person /manager responsible for implementation of the code?	☑ Yes □ No
	Please give details:
	SIBEL CIRAK / HUMAN RESOURCES RESPONSIBLE
Is there a policy to ensure all worker information is confidential?	☑ Yes □ No
	Please give details:
	All worker information is kept on their personnel files. These files are kept on HR room.
Is there an effective procedure to ensure confidential information is kept confidential?	☑ Yes □ No
	Please give details:
	All worker information is kept on their personnel files. These files are kept in SIBEL CIRAK / HUMAN RESOURCES RESPONSIBLE office.
Are risk assessments conducted to evaluate policy and procedure effectiveness?	☑ Yes □ No
	Please give details:
	Health and Safety Risk assessment including policy and procedure effectiveness was conducted.

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Does the facility have a process to address issues found when conducting risk assessments, including implementation of	☑ Yes □ No
	Please give details:
controls to reduce identified risks?	The facility performs a corrective action plan for the findings that are addressed in risk assessment.
Does the facility have a policy/code which require labour standards of its own	☑ Yes □ No
suppliers?	Please give details:
	The facility's code includes labour standards of its own suppliers.
	Land Rights
Does the site have all required land rights licenses and permissions (see SMETA	☐ Yes ☑ No
Measurement Criteria)?	Please give details:
	There is no opening and operating permit, please refer to NC.
Does the site have systems in place to conduct legal due diligence to recognize	☐ Yes ☑ No
and apply national laws and practices	Please give details:
relating to land title?	The facility does not fulfils the requirements during getting facility opening and operating permit.
Does the site have a written policy and procedures specific to land rights?	☑ Yes □ No
procedures openine to land rights.	Please give details:
	The facility's main production process is not risky regarding land rights.
Is there evidence that facility/site	☑ Yes □ No
compensated the owner/lessor for the land prior to the facility being built or expanded?	Please give details:
	The facility is the renter of the place and the permit of construction use has been given by the municipality.
Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	☑ Yes □ No
	Please give details:
	There is no land acquisition. In case of a land acquisition, the facility has to apply to the municipality and fulfil the obligations regarding environmental impact assessment, construction permit etc.
Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?	☐ Yes ☑ No
	Please give details:
	N/A

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Non-Compliance		Evidence			
[Back to findings summary]					
	Non-C	ompliance]	
Status	OPEN				
Reference	ZAF600019042				
Clause	0B - Manageme	nt Systems and co	de Implementation		
Issue Title	34 - Site is operating without all required in-date licences and permits (e.g. business / factory licence has expired)				
Subcategory	Site's licenses &	Certifications			
New or carried over?	☑ New	□ Ca	nrried Over	1	
Root cause	☐ Training	☑ Sy	stem		
	□ Costs	□ La	ck of workers		
	□ Other				
Root cause - Other					
Local law issue	10/8/2005), II. S 19/3/2007 – 200 facility are not o	pened and operated ermit" that is taken	ged first clause: not allowed that the d without "Opening		
ETI code	0.B.4 - Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with.				
Explanation to the non compliance	İşletmenin işyeri açma ve çalışma ruhsatının görülemediği not edildi. (Başvuru formu görülmüştür.) / It was noted that the opening and operating permit work could not be seen. (Application form has been seen.) /				
Follow up method	☐ Follow up au	dit ☑ De	esktop audit		
Timescale	☐ Immediate	□ 30 days	□ 60 days		
	☑ 90 days	☐ 120 days	☐ 180 days		
	□ 365 days	□ Other			
Actions	İşyeri açma ve ç and operating pe	alışma ruhsatı sağl ermit shall be provi	anmalıdır. / Opening ded.		

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1 - Freely chosen Employment [Summary of Findings]

- 1: Compliance Requirements
- 1.1 There is no forced, bonded or involuntary prison labour.
- 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and

record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems. **Current Systems:** Overtime works are voluntary. Employees have free access to toilets, drinkable water. Employees are free to leave the facility at the end of their shifts. No deposits were required. Employees are free to keep their identity papers. The facility does not limit the employees' freedom. Movement of employees at the facility is not prohibited or limited. There is no forced, bonded or involuntary prison labour. There was a formalised application procedure which states that workers must present their ID's for proof of age but that only copies must be kept in the personnel files and the original given back to the workers. Evidence examined: Personnel files Hiring documents Management and worker interview Employee handbook Factory rules Any other comments:

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)	☐ Yes ☑ No
	Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	☐ Yes ☑ No
	Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	☐ Yes ☑ No
	Please give details:
Are there any restrictions on workers' freedom to terminate employment?	☐ Yes ☑ No
	Please give details:
	N/A
If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?	☐ Yes ☐ No ☑ Not Applicable
	Please give details:
	N/A

Audit company: Report reference: Start Date: End Date: 2023-02-08

None

Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	☐ Yes ☑ No
	Please give details:
	N/A
Does the site understand the risks of forced / trafficked / bonded labour in its supply	☐ Yes ☐ No ☑ Not Applicable
chain	Please give details:
	N/A
Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	☑ Yes □ No
	Please give details:
	The facility has a detailed procedure regarding this issue includes reducing the risk of forced/trafficked labour.

2 - Freedom of Association and Right to Collective Bargaining are Respected [Summary of Findings]

- 2: Compliance Requirements
- 2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- 2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- 2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current Systems:

There is no Union in the facility. The Company does not restrict workers to join or be a member of the association requested during the interviews.

The company had an open-door policy. Employees may appeal directly to their supervisors on their grievances or proposals. Employees also state that they will be able to use the suggestion boxes to express their ideas and share them with the Workers' Representatives

There are 3 employee representatives for general working conditions.				
Evidence examined:				
Management interview Workers' interviews Worker representatives' interview Suggestion box records Policy of the facility regarding Freedom of As	sociation.			
Any other comments:				
None				
What form of worker representation/union is	□ Union		Worker Commitee	
there on site? (Please add the name of the union or committee in the textbox)	Other		None	
Other details:	open door p	oolicy, suggestion boxes, v	worker representatives	
Is it a legal requirement to have a union?	□ Yes ☑	No		
Is it a legal requirement to have a worker's committee?	☐ Yes ☑	No		
Is there any other form of effective		No		
worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	Please give	details:		
committee e.g. Flac, sexual flat assinctity		declared that they can go	directly to the management vant. In addition to this,	

Suggestion boxes are placed in several places of the company. Also, there was no union in the facility. But there were 3 worker

representatives who were elected freely by employees.

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Intertek Turkey	ZAA600003506	2023-02-08	2023-02-0

Is there evidence of free elections?

☑ Yes □ No

Does the supplier provide adequate facilities to allow the Union or committee to	☑ Yes □ No			
conduct related business?	Please give details:			
	The supplier does provide adequate facilities to allow the worker representative and the workers to conduct the related activities.			
Name of union and union representative, if applicable:	There is no union at the facility.			
Is there evidence of free elections?	☐ Yes ☐ No ☑ Not Applicable			
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	There were 3 worker representative, open door policy and suggestion boxes in the facility.			
Is there evidence of free elections?	☑ Yes □ No □ Not Applicable			
Are all workers aware of who their representatives are?	☑ Yes □ No			
representatives are:	Please give details:			
	All the workers know who their representative is.			
Were worker representatives freely elected?	☑ Yes □ No			
Date of last election:	2022-09-30			
Do workers know what topics can be raised with their representatives?	☑ Yes □ No			
Were worker representatives/union representatives interviewed?	☑ Yes □ No			
If Yes, please state how many:	1.0			
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	There was no worker committee in the facility.			
Are any workers covered by Collective Bargaining Agreement (CBA)?	☐ Yes ☑ No			

Audit company: Intertek Turkey Report reference: ZAA600003506

Start Date: 2023-02-08

3 - Working Conditions are Safe and Hygienic [Summary of Findings]

Compliance Requirements

- 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
 3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for
- new or reassigned workers.
- 3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current Systems:

- 1. General Health and Safety management
- Potable water was freely available in all areas and test certificates were up-to-date. Sufficient clean toilets segregated by gender were available at all times to workers.
- Health certificates for kitchen operators and the hygiene certificate for the kitchen was up-to-date and legal.
- Risk assessment is done.
- Emergency case plans were provided inside the facility.
- Emergency evacuation plans were provided in the facility.
- Injury records are kept by facility.
- Minutes of meetings show that there are meetings once every month between the H&S committee (workers) and the H&S manager, chemical education and each point is acted on.

2. Fire Safety

- There were at least 2 exits from each work area and these were clearly marked but one of them is opening inwards (NC)
- Firefighting equipment are adequate and checks were up-to-date.
- Fire drills were organised and recorded annually.
- Training had been given by fire marshals had been specially selected for extra training. But, there is no general health and safety training records. (NC)

Electrical safety

- All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards.
- There were competent electricians at the site and their training certificates were available for review.

4. Medical services

- There were adequate first aid kits and they were well stocked.
- There was contracted jobsite doctor and first- aiders in the facility.

Evidence examined:

- Health and safety policy
- Health and safety manual
- Health and safety committee minutes
- Training records and certificates
- Fire equipment maintenance records
- Fire drill records
- Government licenses and checks on air quality and noise level
- Sanitation permit for kitchen
- Health certificates for kitchen staff
- Potable water testing certificates
- Interviews with workers

Audit company: Report reference: Start Date: End Date: Intertek Turkey ZAA600003506 2023-02-08 2023-02-08

Any other comments:	
None	
Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are	☐ Yes ☑ No
these communicated to workers?	Please give details:
	The facility has Health & Safety Procedures and these procedures did not shared with employees via trainings.
Are the policies included in workers' manuals?	✓ Yes □ No
	Please give details:
	The facility has a detailed Health & Safety procedure and this procedure is not explained in Health and Safety trainings to employees
Are there any structural additions without required permits/inspections (e.g. floors	☐ Yes ☑ No
added)?	Please give details:
	There is no structural addition.
Are visitors to the site informed on H&S and provided with personal protective	☑ Yes □ No
equipment?	Please give details:
	These information is provided by H & S specialist.
Is a medical room or medical facility provided for workers?(This section is to list	☑ Yes □ No
evidence to support system description (Documents examined & relevant	Please give details:
comments. Include renewal/expiry date where appropriate))	Highly well-furnished medical centre is available with various rooms to be used for medical care.
Is there a doctor or nurse on site or there is easy access to first aider/ trained medical	☑ Yes □ No
aid?	Please give details:
	The first aid boxes are placed at every production area and 8 first aiders are available for medical aid.
Where the facility provides worker transport – is it fit for purpose, safe, maintained and	✓ Yes □ No
operated by competent persons e.g. buses and other vehicles?	Please give details:
and other vericles:	All transportation vehicles have insurance and all drivers has professional competence certificate(SRC)
Is secure personal storage space provided for workers in their living space and is fit for	☐ Yes ☑ No
purpose?	Please give details:
	N/A
Are H&S Risk assessments are conducted (including evaluating the arrangements for	☑ Yes □ No
workers doing overtime e.g. driving after a long shift) and are there controls to reduce	Please give details:
identified risk?	The risk assessment includes risks related to working hours and overtime practices

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Is the site meeting its legal obligations on environmental requirements including	☐ Yes ☑ No
required permits for use and disposal of natural resources?	Please give details:
matural resources :	The facility has detailed policies and procedures but there is no environmental permit.
Is the site meeting its customer requirements on environmental standards,	☑ Yes □ No
including the use of banned chemicals?	Please give details:
	No banned chemical is used by the facility



	Non-Comp	oliance	Evidence
[Back to findings	summary]		
	Non-Comp	bliance	
Status	CLOSED		
Reference	ZAF600019043		
Clause	3 - Working Conditio	ns are Safe and Hygienic	
Issue Title	161 - No / inadequat provided to workers cause serious injury	e health and safety training in relation to processes which may or death - systemic	
Subcategory	Health & Safety Train	ning	
New or carried over?	☑ New	☐ Carried Over	
Resolved by audit	ZAA600003506		
Root cause	☐ Training	☑ System	
	□ Costs	□ Lack of workers	
	☐ Other		
Root cause - Other			
Local law issue	Occupational Health for Employees (15.0) should provide the halso include the topic should provide the troccupation, risks spemeasure before emp (3)Besides the training changing the profess equipments used in new technology (4)T to Paragraph 1 shound newly appeared risks repeated periodically facilities in very hazafacilities in hazard classifier facilities in less habout the reasons for protection methods a be given to employe or occupational illnessemployees who coul	The Turkish Regulation for and Safety Method and Elements 5.2013), art 6, (1)The employer ealth and safety trainings which is in Appendix 1. (2)The employer aining which includes the ecial to facility and protection ployee start the occupation. In which includes the risk while sion or workplace, changing the the Occupation, application of the he training which is given according ld be renewed due to changing and is and if necessary, it should be and if necessary, it should be and if necessary, it should be a candilated the cast three times a year for ass candilated the compational illness, and safely working methods should be who had occupational accident in accident or occupational accident in the compational accident in the compational accident in the compational accident in the compational second in the compation in the comp	
ETI code		eceive regular and recorded Health d such training shall be repeated for orkers.	
Explanation to the non compliance	verilmediği görülmüş	lık konularına dair eğitimin stür. / It was noted that training on vas not provided in the facility.	

Audit company: Intertek Turkey Report reference: ZAA600003506

Start Date: 2023-02-08

End Date:

2023-02-08

Follow up method	☐ Follow up aud	lit ☑ De	esktop audit	
Timescale	☐ Immediate	☑ 30 days	□ 60 days	
	□ 90 days	□ 120 days	☐ 180 days	
	□ 365 days	□ Other		
Actions	Tüm çalışanlara t verilmesi sağlann provided with bas	nalıdır. / All emplo	yees should be	
Additional comments	provided with basic health education training. Tüm çalışanlara temel sağlık eğitimi verilmiştir. / Basic health training is provided to all workers. 1.DESKTOP INCELEMESI: 14.04.2023 İşletmede temel sağlık konularına dair eğitimin verildiği görülmüştür. Bulgu kapanmıştır// 1.DESKTOP REVIEW: 14.04.2023 It has been observed that training on basic health issues is given in the facility. Finding is closed.			



Non-Compliance Evidence			Evidence
[Back to findings s	summary]		
	Non-Compli	iance	
Status	CLOSED		
Reference	ZAF600019044		
Clause	3 - Working Condition	s are Safe and Hygienic	
Issue Title	267 - No / inadequate machinery, or machine law	certificates for inspections of es not registered as required by	
Subcategory	Machinery		
New or carried over?	☑ New	☐ Carried Over	
Resolved by audit	ZAA600003506		
Root cause	☐ Training	☑ System	
	□ Costs	☐ Lack of workers	
	☐ Other		
Root cause - Other			
Local law issue	Occupational Health a work equipments (25/l Related Matters for M Periodical Checks Al and check criteria for lon Table 2 provided thare reserved. Table 2 Lift), Forklift, Transpal Check Period(Max): 1 compliance points are health and safety and is inappropriate if thes	arkish Regulation about and Safety circumstances using 04/2013) No: 28628 Addition III - aintenance, Repairs and rt 2.2.3 Periodical check period lifting and transfer tools are stated nat the criteria stated in Art 2.1.1 Equipment: Lift(Man lift, Goods let, Lifting or transferring tools year Art.1.9. In case when none detected in terms of occupational operating of the work equipment se points are not corrected; the not be used until these points are	
ETI code	provided, bearing in me the industry and of an steps shall be taken to health arising out of, a course of work, by mir	enic working environment shall be nind the prevailing knowledge of y specific hazards. Adequate o prevent accidents and injury to associated with, or occurring in the nimising, so far as is reasonably as of hazards inherent in the	
Explanation to the non compliance	periyodik muayene ra noted that the periodic	rük ve 1 insan asansörüne ait porları görülememiştir./ It was c inspection reports of 1 freight in the facility could not be seen.	
Follow up method	☐ Follow up audit	☑ Desktop audit	
Timescale	☐ Immediate ☑	30 days □ 60 days	

Audit company: Intertek Turkey

Report reference: ZAA600003506

Start Date: 2023-02-08

	□ 90 days	☐ 120 days	☐ 180 days	
	□ 365 days	□ Other		
Actions	Asansörler için uy sağlanmalıdır. / Tl reports shall be p	ne appropriate pe	eriodical inspection	
Additional comments	freight lift and 1 hu 1.MASAUSTU ING İşletmede 1 yük vo muayenelerinin ya 1. DESKTOP REV	riodical inspectio uman elevator. CELEMESI: 14.0 e 1 Insan asansö apıldığı görülmüş VIEW: 14.04.202 ved that the techi	ns were made for 1 4.2023 brünün fenni tür.// 3 nical inspections of 1	

Non-Compliance			Evidence	
[Back to findings	summary]			
	Non-Com	pliance		
Status	CLOSED			
Reference	ZAF600019045			
Clause	3 - Working Condition	ons are Safe and Hygienic		
Issue Title	203 - Fire exits are i location, etc.	inadequate by design/construction,		
Subcategory	Fire Safety - Fire ex	its		
New or carried over?	☑ New	☐ Carried Over		
Resolved by audit	ZAA600003506			
Root cause	☐ Training	☑ System		
	□ Costs	□ Lack of workers		
	□ Other			
Root cause - Other				
Local law issue	Taken for the Buildin 28710) Appendix-1 Requirements for British Requirements for British Routes and Door routes and doors at outside or a safety a front of or behind the emergency exit doo easily by employees are opened outward not be used as eme be any obstacle that emergency exit rout exits which leading Emergency exit doo by any material. 10 doors shall be mark Regulation on Safet 23/12/2003, No: 253 places and be perm			
ETI code	provided, bearing in the industry and of a steps shall be taken health arising out of course of work, by r	gienic working environment shall be mind the prevailing knowledge of any specific hazards. Adequate to prevent accidents and injury to associated with, or occurring in the minimising, so far as is reasonably ses of hazards inherent in the nt.		
Explanation to the non compliance	rotasının mevcut old kapısından 1'inin içe	saha turunda, 2 adet acil çıkış duğu görülmüştür. 2 adet acil çıkış eriye doğru açıldığı ve öncesinde olduğu tespit edilmiştir. / It was		

Audit company: Report reference: Start Date: End Date:

	observed that there are 2 emergency exit routes. It noted that 1 of the 2 emergency exit doors opened inwards and there was a sliding door before it durir field tour made from the facility.		
Follow up method	☐ Follow up audit ☑ Desktop audit		
Timescale	☐ Immediate ☐ 30 days ☐ 60 days		l .
	☐ 90 days ☐ 120 days ☐ 180 days		l .
	☐ 365 days ☐ Other		l .
Actions	Acil çıkış kapılarının dışarıya açılması sağlanmalıd Facility shall provide that all emergency exit doors opening outward.		
Additional comments	Sensörlü ve içe açılan kapı olan acil çıkış kapısı ipi edilmiştir. Tüm tahliye haritaları ve yönlendirmeler göre düzenlenmiştir. Firmada 2 adet acil kaçış rota bulunmaktadır. (1 yangın merdivenleri, 2 binanın y tarafına direkt dışarı açılan merdivenler). Kat planla ve iptal edilen kapının fotoğrafını ekte görebilirsiniz alan artık acil kaçış rotası olarak kullanılmamaktad / The emergency exit door, which has a sensor and opens inwards, has been cancelled. All evacuation maps and directions are arranged accordingly. The company has 2 emergency escape routes. (1 escape stairs, 2 stairs that open directly to the side the building). You can see the floor plans and the pof the canceled door attached. The relevant area is longer used as an emergency escape route. 1. DESKTOP REVIEW: 14.04.2023 According to the documents examined from the enterprise; The inward opening door has been can and the emergency exit door directions have been changed as specified in the evacuation plan// 1. MASAUSTU INCELEME: 14.04.2023 İşletmeden incelenen dokümanlara göre; içeriye da açılan kapıyı iptal edilmiş olup, acil çıkış kapısı yönlendirmeleri tahliye planında belirtildiği üzere değişitirilmiştir.	ire of ohoto	

4 - Child Labour Shall Not Be Used [Summary of Findings]

4: Compliance Requirements

Any other comments:

None

- 4.1 There shall be no new recruitment of child labour.
- 4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.
- 4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- 4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

Current Systems and Evidence Examined To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems. Current Systems: The youngest employee was 17 years old in the facility. The age control of applicants is performed during recruitment process by HR responsible. Evidence examined: • ID Copies of employees • Personnel file • Management and employees' interviews • Child labour policy

Legal age of employment:	15
Age of youngest worker found:	17
Are there children present on the work floor but not working at the time of audit?	☐ Yes ☑ No
Percentage of under 18's at this site (of total workers)	2%
Are workers under 18 subject to hazardous work assignments?	☐ Yes ☑ No
	Please give details:
	Workers under 18 is not subject to hazardous work assignments.

Audit company: Intertek Turkey Report reference: ZAA600003506

Start Date: 2023-02-08

End Date:

2023-02-08

5 - Living Wages are Paid [Summary of Findings]

5: Compliance Requirements

- 5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- 5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- 5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current Systems:

There was no employee under the legal minimum wage.

Payslip is given to the employees.

Annual leaves are used by the employees.

Payment Day:10 th of each month

Benefits such as social insurance, annual leave, and child-bearing leave are provided to employees.

Legal minimum wage:

Since January 1st, 2021: 3.577,50 TL (Gross); 2.825,90 TL (Net-including subsistence allowance) / month

Since January 1st, 2022: 5004,00 TL/month (Gross); 4253,40 TL/month (Net). Since July 1st, 2022: 6471 TL/month (Gross); 5500.35 TL/month (Net)

Since January 1st 2023: 8506,80 TL/month(Net)

Evidence examined:

- -Time and payment records are provided for last 12 months (January 2022 December 2022).
- -26 employees were sampled, time and wage records are reviewed for December 2022 (last paid), August 2022 (random) and April 2022.
- -Social insurance records
- -Employee & management interviews
- -Labour contracts

Intertek Turkey

Any other comments:

None

Summary Information			
Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: null Per Week: 45.0 Per Month: null	Actual Per Day: 9.0 Per Week: 45.0 Per Month: 225.0	NO
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 11.0 Per Week: null Per Month: null	Actual Per Day: 3.0 Per Week: 8.0 Per Month: 15.0	NO

Audit company: Report reference: Start Date: End Date:

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ZAA600003506

Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month) Per Week: null Per Week: 0.0 Per Week: 0.0 Per Worth: 5500.0 Per Week: 0.0 Per Worth: 5500.0 Per Week: 0.0 Per Worth: 5500.0 Per Week: 0.0 Per Worth: 5500.0 Per Week: 0.0 Per Worth: 5500.0 Per Week: 0.0 Per Week: 0.0 Per Worth: 5500.0 Per Week: 0.0 Per Worth: 5500.0 Per Week: 0.0 Per Worth: 5500.0 Per Week: 0.0 Per Worth: 5500.0 Per Worth:			•	
(Minimum legia and actual minimum overtime wage at site, please state if possible per hr, day, week, and month) Wages Analysis: Were accurate records shown at the first request? Were accurate records shown at the first request? Were accurate records shown at the first request? Were accurate records shown at the first request? Were accurate records shown at the first request? Were accurate records shown at the first request? Were accurate records shown at the first request? Were accurate records shown at the first request? Were accurate records shown at the first request? Wages Analysis: Yes □ No Time and payment records are provided for last 12 months (January 2022 – December 2022). Jeenployees were sampled, time and wage records are reviewed for December 2022 (last paid), August 2022 (random) and April 2022. Are there different legal minimum wage grades? If Yes, please specify all. If there are different legal minimum grades, are all workers graded and paid correctly? Please give details: For the lowest paid production workers, readed and paid correctly? Please give details: For the lowest paid production workers, readed and paid correctly? Please give details: For the lowest paid production workers were give details: For the lowest paid production workers were give details: For the lowest paid production workers were give details: For the lowest paid production workers were give details: Below legal minimum wage where give details: "Since January 1st, 2021: 3.577,50 TL (Gross-including subsistence allowance). 2.265,90 (Net-including subsistence allowance). 2.265,90 (Net-including subsistence allowance). Since July 1st, 2022: 6471 TL/month (Gross): 5500.35 TL/month (Net) Were anyionate the breakdown of workforce earning under minimum wage and paid to the production was an accurate production was accurate production was accurate production was accurate production was accurate production was accurate production was accurate production was accurate production was accurate production w	(Minimum legal and actual minimum wage at site, please state if possible per hr, day,	Per Day: null Per Week: null	Per Day: 0.0 Per Week: 0.0	NO
Were accurate records shown at the first request? Yes	(Minimum legal and actual minimum overtime wage at site, please state if	Per Day: null Per Week: null	Per Day: 0.0 Per Week: 0.0	NO
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please se SMETA Best Practice Guidance and Measurement Criteria) Are there different legal minimum wage grades? If Yes, please specify all. If there are different legal minimum grades, are all workers graded and paid correctly? For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum? Since January 1st, 2021: 3.577.50 TL (Gross- including subsistence allowance); 2.825,90 (Net- including subsistence allowance); Since January 1st, 2022: 6471 TL/month (Gross); 5500.35 TL/month (Net) Since January 1st 2023: 8506.80 TL/month(Net) Please indicate the breakdown of workforce per earnings Bonus Scheme found: What deductions are required by law e.g. social insurance? Please list all deductions that have been made. Time and payment records are provided for last 12 months (January 2022 – December 2022). 26 employees were sampled, time and wage records are repulsed for December 2022 (tast paid), August 2022 (random) and April 2022. Be ployees were sampled, time and wage records are repulsed for December 2022 (tast paid), August 2022 (random) and April 2022. Be ployees were sampled, time and wage records are repulsed for December 2022 (tast paid), August 2022 (random) and April 2022. Be ployees were sampled, time and wage records are repulsed for December 2022 (tast paid), August 2022 (random) and April 2022. Be ployees were sampled, time and wage records are repulsed for December 2022 (tast paid), August 2022 (random) and April 2022. Be ployees were sampled, time and wage records are repulsed for December 2022 (tast paid), August 2022 (random) and April 2022. Be ployee all we set all valuations are repulsed and paid correctly? Please indicate the breakdown of workforce ger earnings Social insurance and taxes Social insurance 2. Tax 3. Unemployment benefit Please list all deductions that have not		Wages Analysis:		
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are all workers graded and paid correctly? Please give details: Please give details: Please give details: Please give details: Below legal min	Are there different legal minimum wage grades? If Yes, please specify all.	☐ Yes ☑ No		
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social insurance? Please state all types: Have these deductions been made? Please list all deductions that have been made. Please list all deductions that have not been made. Please list all deductions that have not been made. Please list all deductions that have not been made. Please list all deductions that have not been made. Please list all deductions that have not been made. Please list all deductions that have not been made. Please list all deductions that have not been made. Please list all deductions that have not been made. Please list all deductions that have not been made. Please list all deductions that have not been made. Please list all deductions that have not been made. Please list all deductions that have not been made. Please list all deductions that have not been made. No made. Please list all deductions that have not been made. Please list all deductions that have not been made. No made. Please list all deductions that have not been made. Please list all deductions that have not been made. No made. Please list all deductions that have not been made. No made. Please list all deductions that have not been made. No made. Please list all deductions that have not been made. No made. Please list all deductions that have not been made. No made. Please list all deductions that have not been made. No made. Please list all deductions that have not been made. No made. Please list all deductions that have not been made. No made. Please list all deductions that have not been made. No made. No made.		Note: type of employee (e.g. full time, temp, etc.) and please state		
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hours of work and wages? Were any inconsistencies found? (if yes ☐ Yes ☑ No				
	Were appropriate records available to verify hours of work and wages?	☑ Yes □ No		
describe nature)	Were any inconsistencies found? (if yes describe nature)	☐ Yes ☑ No		

Audit company:Report reference:Start Date:End Date:Intertek TurkeyZAA6000035062023-02-082023-02-08

Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid	☑ Yes □ No
	Please give details:
for their time)	It was verified with interviews that all worked times were reflected on the provided records.
Is there a defined living wage: This is not normally minimum legal wage. If	☐ Yes ☑ No
answered yes, please state amount and source of info:	Please give details:
Please see SMETA Best Practice Guidance and Measurement Criteria.	
If yes, what was the calculation method	☐ ISEAL/Anker Benchmarks ☐ Asia Floor Wage
used.	☐ Figures provided by Unions ☐ Living Wage Foundation UK
	☐ Fair Wear Wage Ladder ☐ Fairtrade Foundation
	☐ Other – please give details:
Are there periodic reviews of wages? If Yes	☐ Yes ☑ No
give details (include whether there is consideration to basic needs of workers plus discretionary income).	Please give details:
Are workers paid in a timely manner in line with local law?	☑ Yes □ No
Is there evidence that equal rates are being paid for equal work:	☑ Yes □ No
paid for equal work.	Please give details:
	It was confirmed with worker interviews and document review.
How are workers paid:	☐ Cash ☐ Cheque
	☑ Bank Transfer ☐ Other

Audit company: Intertek Turkey Report reference: ZAA600003506

Start Date: 2023-02-08

End Date: 2023-02-08

Good Example	Evidence
summary]	
Good Example	1
OPEN	
ZAF600019046	
5 - Living Wages are Paid	
429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	
Benefits & Insurance	
☑ New ☐ Carried Over	
Yemek ve ulaşım çalışanlara ücretsiz sağlanmaktadır. / Meal and transportation services are provided free of charge to employees.	
Çalışan görüşmeleri & Döküman incelemesi / Employee Interview % Document Review	1
	Good Example OPEN ZAF600019046 5 - Living Wages are Paid 429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport Benefits & Insurance New Carried Over Yemek ve ulaşım çalışanlara ücretsiz sağlanmaktadır. / Meal and transportation services are provided free of charge to employees. Çalışan görüşmeleri & Döküman incelemesi / Employee

6 - Working Hours are not Excessive [Summary of Findings]

- 6: Compliance Requirements
- 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.
- 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week. 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
 6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5
- below.
- 6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where all of the following are met:
- 6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current Systems:

Working hours are arranged as From Monday to Friday 08:00 – 18:00 including 40 minutes lunch and 10 minutes x 2 tea break = 45 hours/week

Finger reader record system is used.

- -Time and payment records are provided for last 12 months (January 2022 December 2022).
- -10 employees were sampled, time and wage records are reviewed for December 2022 (last paid), August 2022 (random) and April 2022.

Evidence examined:

- -Attendance records of employees were reviewed.
- -Interviews were conducted with employees and management.

Any other comme	∍nts	i
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None

Working hours' analysis		
Systems & Processes		
What timekeeping systems are used?	Finger reader record system.	
Is sample size same as in wages section?	✓ Yes □ No Please give details:	
Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	☑ Yes □ No	

Audit company: Report reference: Start Date: End Date:

Are there any other types of contracts/employment agreements used?	☐ Yes ☑ No	
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	☐ Yes ☑ No	
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	☑ 1 in 7 days ☐ 2 in 14 days ☐ No (please explain)	
Is this allowed by local law?	☑ Yes □ No	
Maximum number of days worked without a day off (in sample):	6	
Stand	ard/Contracted Hours worked	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	☐ Yes ☑ No % of workers: null% Frequency:	
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	□ Yes ☑ No	
Overtime Hours worked		
Actual overtime hours worked in sample (State per day/week/month)	0-23 hrs/month in December 2022(last paid month) 0-16 hrs/month in August 2022 (Random month) 0-15 hrs/month In April 2022(Random month)	
Combined hours (standard or contracted + overtime hours = total) over 60 found?	☐ Yes ☑ No Please give details: N/A	
Approximate percentage of total workers on highest overtime hours:	20%	
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	☑ Yes ☐ No ☐ Conflicting InformationPlease give details:Wording of contract, worker interviews	
	Overtime premium	
Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)		
,	Please give details:	
	150% for overtime in weekdays and weekends. Overtime premium for national/religious holidays is 200%	
Is overtime paid at a premium?	☑ Yes □ No	
	All employees, monthly	

Audit company: Report reference: Start Date: End Date:

If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	☑ No □ Other	☐ Consolidated pay	☐ Collective Bargaining agreements
Diseas pire dataile			
Please give details	N/A		
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any	☐ Overtime is voluntary	 ☐ Onsite Collective bargaining allows 60+ hours/week is voluntary 	☐ Safeguards are in place to protect worker's health and safety
checked boxes above e.g. detail of consolidated pay / CBA or Other)	☐ Site can demonstrate exceptional circumstances	Other reasons (please specify)	
Please give details	There is no practice o due to technical reaso	ver 60 hours – "other re ons in system.	eason" is selected to
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	N/A		
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	□ Yes ☑ No		
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	☐ Yes ☑ No		

Audit company: Intertek Turkey

Report reference: ZAA600003506

Start Date: 2023-02-08

End Date:

2023-02-08



	Non-Compliance		Evidence
[Back to findings s	ummary]		
	Non-Compliance		
Status	OPEN		
Reference	ZAF600019041		
Clause	6 - Working Hours are not Excessive		
Issue Title	469 - Working hours exceed what is allowed by law or collective bargaining agreement - systemic		
Subcategory	Excessive hours		
New or carried over?	☑ New ☐ Carried Over		
Root cause	☐ Training ☑ System		
	☐ Costs ☐ Lack of workers		
	□ Other		
Root cause - Other			
Local law issue	In accordance with the Turkish Regulation on Working Hours Related to Labor Law, art 4 In general the duration of work shall be at the most 45 hours a week. This period shall be applied by dividing equally among the days of the week worked, unless the opposite is concluded. Daily working hours shall not be exceeded 11 hrs a day in any case.	•	
ETI code	6.1 - Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub–clauses 6.2 to 6.6 are based on international labour standards.		
Explanation to the non compliance	İşletmede çalışanların günlük toplam (normal+fazla mesai) çalışma saatleri 11 saati aşmaktadır. Aralık 2022: 26 çalışandan 11'i max: 2 kez max: 12 saat/gün Ağustos 2022: 26 çalışandan 6'si max: 2 kez max: 12 saat/gün Nisan 2022: 26 çalışandan 6'sı max: 1 kez max: 12 saat/gün, / It was noted that employees' daily total (regular+overtime) working hours exceeded 11 hours. December 2022: 11 out of 26 employees max: 2 times max: 12 hours/day August 2022: 6 out of 26 employees max: 2 times max: 1 hours/day April 2022: 6 out of 26 employees max: 1 time max: 12 hours/day,		
Follow up method	☑ Follow up audit ☐ Desktop audit		
Timescale	☐ Immediate ☐ 30 days ☑ 60 days	\neg	
	☐ 90 days ☐ 120 days ☐ 180 days		
	□ 365 days □ Other		
Actions	Çalışanların günlük toplam (normal+fazla mesai) çalışma saatleri 11 saat ile sınırlanmalıdır. / Employees' daily total (regular+overtime) working hou shall be limit to 11 hours.	rs	

Audit company: Report reference: Start Date: End Date: ZAA600003506 2023-02-08

2023-02-08

Audit company: Intertek Turkey Report reference: ZAA600003506

Start Date: 2023-02-08

End Date: 2023-02-08

7 - No Discrimination is Practiced [Summary of Findings]

7: Compliance Requirements

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current Systems:

Evidence examined:

Confirmed with management & employee interviews as well as document review in accordance with SMETA Best Practice Guidance and Local Law.

No evidence against discrimination requirements of the client was found during the audit processes.

Employees stated that they were paid and treated equally.

There was no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, national origin, religion, age, gender, marital status, sexual orientation or political affiliation. No discrimination in any aspect according to interviews.

Personnel files Disciplinary policy Company social compliance policy Employee interview			
Any other comments:			
None			
Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 40%		Female: 60%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	0		
Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	☐ Hiring☐ Promotion	☐ Compensation☐ Termination or retirement	☐ Access to training☑ No evidence of discrimination found
Please give details	N/A		
Р	rofessional Developme	nt	
What type of training and development are available for workers?	Discrimination policy a employees. Also, disc		
Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	☑ Yes □ No		

End Date: Audit company: Report reference: Start Date:

8 - Regular Employment Is Provided [Summary of Findings]

- 8: Compliance Requirements
- 8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- 8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

- Additional Elements: Responsible Recruitment 8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.
- 8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.
- 8.5 Employment agencies must only supply workers registered with them.
- 8.6 Workers pay no recruitment fee at any stage of the recruitment process.
- 8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.

Current	Systems	and	Evidence	Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current	Systems:
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Personnel files are kept properly in HR room.

Employees' labour contracts were available in their personnel files.

A copy of employment contract was given to employees.

Evidence examined:

Personnel files, employment contracts, social insurance records were checked. Management & employee interviews.

Any other comments:

None

Intertek Turkey

Responsible Recruitment		
All Workers		
Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	 ✓ Terms & Conditions presented ✓ Understood by workers ✓ Same as actual conditions 	
Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)	☐ Yes ☑ No	
Migrant Workers		
Type of work undertaken by migrant workers:	15 Migrant employees were working in production section.	
Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0	

End Date: Audit company: Report reference: Start Date:



Are migrant workers' voluntary deductions	☐ Yes ☑ No		
(such as for remittances) confirmed in writing by the worker and is evidence of the	Please give details:		
transaction supplied by the facility to the worker?	N/A		
Is there any observation on this finding?	N/A		
Are any migrant workers in skilled, technical	☐ Yes ☑ No		
or management roles? (This should include all migrant workers including permanent			
workers, temporary and/or seasonal			
workers)	Non ampleyee workers		
Door itment Food	Non-employee workers		
Recruitment Fees			
Are there any fees?	☐ Yes ☑ No		
Agency Workers (if applicable) (Workers sourced from a local agent who are not directly paid by the site, but paid by the agency. Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)			
Number of agencies used (average):	0		
Please provide the names of agencies if applicable	N/A		
Were agency workers' age / pay / hours included within the scope of this audit?	□ Yes □ No		
Were sufficient documents for agency workers available for review?	☐ Yes ☑ No		
Is there a legal contract agreement with all agencies?	☐ Yes ☑ No		
agonolos :	Please give details:		
	N/A		
Does the site have a system for checking labour standards of agencies?	□ Yes ☑ No		
	Please give details:		
	N/A		
Contractors (Contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider.)			
Any contractors on site?	☐ Yes ☑ No		
	Please give details:		
	N/A		
Do all contractor workers understand their	☐ Yes ☑ No		
terms of employment?	Please give details:		
	N/A		
	13/73		

Audit company: Report reference: Start Date: 2023-02-08 End Date:

8A - Sub-Contracting and Homeworking [Summary of Findings]

8A: Compliance Requirements

8.A.1 There should be no sub-contracting unless previously agreed with the main client.
8.A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.

Current Systems and Evidence Examined		
record what controls and processes are currently in place who is /are responsible for the management of this item of	and written procedures in conjunction with relevant managers, to understand, and e.g. record what policies are in place, what relevant procedures are carried out, of the code. Evidence checked should detail any documentary or verbal evidence own to support the systems.	
Current Systems:		
No subcontractor is used by the facility.		
Evidence examined:		
Employees from every unit were selected and interviewed. Selected employees' personnel files were checked. Details: Personnel files, employment contracts, social insurance records were checked. Management & employee interviews.		
Any other comments:		
None		
Summary of sub-contracting – if applicable		
Is there any sub-contracting at this site?	□ Yes ☑ No	
Summary of homeworking – if applicable		
Is homeworking used at this site?	☐ Yes ☑ No	

Audit company: Intertek Turkey Report reference: ZAA600003506

Start Date:

End Date:

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9 - No Harsh or Inhumane Treatment is Allowed [Summary of Findings]

9: Compliance Requirements

- 9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
- 9.2 companies should provide access to a confidential grievance mechanism for all workers

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current Systems:

There was no evidence of any physical abuse or discipline, the threat of physical abuse, sexual or any other types of harassment or verbal abuse as well as any other forms of intimidation were not noted, as confirmed by the interviews.

Disciplinary regulation was complaint with the legal regulations.

No disciplinary action was taken.

Evidence examined:

Any other comments:

Are there any open disputes?

Intertek Turkey

None

Disciplinary regulation of the facility and the personnel files of the sampled employees were reviewed.

Suggestion boxes check book was checked.

Employee interviews were conducted

The relevant policy on prevention of harassment and abuse

Internal grievance procedure documentation.

	☑ Yes □ No
	Please give details:
	There are published, anonymous and/or open channels available for reporting any violations of Labour standards. The employees can report to the legal authorities. There is suggestion box, and an internal confidential email address for reporting grievances.

If yes, are workers aware of these channels Workers are aware of these channels. There are published, and have access? Please give details. anonymous and/or open channels available for reporting any violations of Labour standards If yes, what type of mechanism is used e.g. Suggestion box, worker representative, open door policy hotline, whistle blowing mechanism, comment box etc. Please give details. Which of the following groups is there a Worker Communities grievance mechanism in place for? Suppliers □ Other Please provide grievance mechanism There is a suggestion box in the facility. It was checked with the details worker representative regularly. Also, the facility has a hotline that is posted on the entrance of the facility building for external communities.

☐ Yes ☑ No

2023-02-08

Please give details:

2023-02-08

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Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	
Is there a published and transparent disciplinary procedure?	☑ Yes □ No Please give details:
If yes, are workers aware of these the disciplinary procedure?	✓ Yes □ No Please give details:
Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	☐ Yes ☑ No Please give details:

10A - Entitlement to Work and Immigration [Summary of Findings]

10A: Compliance Requirements

10.A.1 Only workers with a legal right to work shall be employed or used by the supplier.
10.A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current Systems:

There are 15 migrant workers.

Evidence examined:

ID copies and social security registrations of the sampled employees were reviewed

Any other comments:

None

Audit company: Intertek Turkey

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Start Date: 2023-02-08 End Date:

2023-02-08

10B2 - Environment 2-Pillar [Summary of Findings]

10B2: Compliance Requirements

10.B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.

10.B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.

Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current Systems:

Documented waste management procedure is available. Solid wastes are given to authorized agencies for disposal. Legal environmental / EIA exemption decision letters are not available (NC)

Evidence examined:

Environmental documents such as procedures, waste transportation documents

Any other comments:

None

Audit company: Intertek Turkey Report reference: ZAA600003506

Start Date: 2023-02-08

End Date:

2023-02-08



	Non-Compliance	Evidence	
[Back to findings s	ummary]		
	Non-Compliance		
Status	OPEN		
Reference	ZAF600019040		
Clause	10B2 - Environment 2–Pillar		
Issue Title	598 - The site does not have all legally required permits for use and / or disposal of resources e.g. energy, water, air emissions, waste etc.		
Subcategory	General Environmental Permits, & Management systems		
New or carried over?	☑ New ☐ Carried Over		
Root cause	☐ Training ☑ System		
	□ Costs □ Lack of workers		
	□ Other		
Root cause - Other			
Local law issue	Regulation about the obligatory permits and licenses according to the Environment Law(29.04.2009) No: 27214, Article 4; facilities subject to environment permit or to environment permit and license are classified as below regarding to their impact to environment; 1-Facilities which have contaminating impact to environment at high level (Appendix 1) 2- Facilities which have contaminating impact to environment (Appendix 2) Facilities which listed at Appendix 1 or 2 are required to obtain environment permit or to environment permit and license.		
ETI code	10.B2.1 - Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.		
Explanation to the non compliance	Firmada çevre izni veya kapsam dışı yazısı yoktur. / It was noted that there was no environmental permit or out of scope letter at the facility.		
Follow up method	☐ Follow up audit ☐ Desktop audit		
Timescale	☐ Immediate ☐ 30 days ☐ 60 days		
	□ 90 days □ 120 days □ 180 days		
	□ 365 days □ Other		
Actions	Firma çevre izni veya kapsam dışı yazısı sağlamalıdır. / Facility shall provide environmental permit or out of scope letter.		

Audit company: Intertek Turkey Report reference: ZAA600003506

Start Date: 2023-02-08

End Date: 2023-02-08

Audit company: Intertek Turkey

Report reference: ZAA600003506

Start Date: 2023-02-08

End Date: 2023-02-08

Attachments



Time Record Machine.JPG



Toilets.JPG



Suggestion Box.JPG



Warehouse.JPG



Potable Water1.JPG



Quality Control Section.JPG



Sewing Section.JPG



Lunch Hall.JPG



Potable Water.JPG



Outview Of the Facility.JPG



Ironing Section.JPG



Locker Room.JPG





Fire Hose.JPG



Generator.JPG



First Aid Kit.JPG



Fire Emergency Door opens inwards (NC).JPG



Fire Emergency Exit sliding door (NC).JPG



Fire Extinguisher.JPG



Fire Alarm Button.JPG

08/02/2023 11:14



Eye Wash Fountain.JPG



Emergency Signs.JPG



Evacuation Plan.JPG



Emergency Exit Door.JPG



Cutting Section.JPG



Compressor.JPG



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Your feedback on your experience of the SMETA audit you have observed is extremely valuable. It will help to make improvements to future versions.

You can leave feedback by following the appropriate link to our questionnaire:

Click here for Buyer (A) & Buyer/Supplier (A/B) members:

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d

Click here for Supplier (B) members:

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d

Click here for Auditors:

https://www.surveymonkey.co.uk/r/BRTVCKP