




Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 408378109	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 408485449
Business name (Company name):	OZKAPLAN IPEK HALI TEKSTIL SANAYI VE TICARET A.S.		
Site name:	OZKAPLAN IPEK HALI TEKSTIL SANAYI VE TICARET A.S.		
Site address: <i>(Please include full address)</i>	BASPINAR (ORGANIZE) OSB MAHALLESİ OSB 4. BOLGE 83413 NO: 9/10 SEHIT KAMIL - GAZIANTEP	Country:	TURKEY
Site contact and job title:	HATUN BATLICANCI –QUALITY AND SOCIAL COMPLIANCE RESPONSIBLE		
Site phone:	00905346433648	Site e-mail:	kaliteyonetimi@ozkaplancarpet.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar <input checked="" type="checkbox"/> Business Ethics
Date of Audit:	02&03.05.2023		

Audit Company Name & Logo: 	Report Owner (payer): OZKAPLAN IPEK HALI TEKSTIL SANAYI VE TICARET A.S.
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

If you have any concerns or queries about this SMETA report or the associated SMETA audit, please contact grievance@sedex.com.

To confirm the validity of this report, please visit <https://www.sedex.com/audit-verifier/>

Audit Content:

(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 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.

Any exceptions to this must be recorded here (e.g. different sample size): None

Auditor Team (s) (please list all including all interviewers):

Lead auditor: EMINE IDIS – EXPERT AUDITOR

APSCA number: CSCA 21702434

Lead auditor APSCA status: CSCA

Team auditor: EMRE AKDEMIR – TEAM AUDITOR

APSCA number: ASCA 32200349

Interviewers: EMINE IDIS, EMRE AKDEMIR

Report writer: EMRE AKDEMIR

Report reviewer: MELTEM CAKIR

Date of declaration: 03.05.2023

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.

This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information be gathered and considered from records review, worker interviews, management interviews and visual observation. More information is gathered during the social audit process than is provided here. The audit process is a sampling exercise only and does not guarantee that the audited site prior, during or post-audit, are in full compliance with the Code being audited against. The provisions of this Code constitute minimum and not maximum standards and this Code should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable laws and where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection. The ownership of this report remains with the party who has paid for the audit. Release permission must be provided by the owner prior to release to any third parties.

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>		0	0	None observed
0B Management systems and code implementation		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None observed
1. Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None observed
2. Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None observed
3. Safety and Hygienic Conditions	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	1	GE#1 Periodic controls of lifting and conveying vehicles are carried out once every 3 months.
4. Child Labour	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None observed
5. Living Wages and Benefits	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	2	0	6	NC#1 According to the document review and management statement, it was seen that the meal and travel fee were not included in the calculation of the compensation payments made. NC#2

									<p>According to document control and management interview; Production was stopped in April 2022 due to the employer's inability to provide employment. 133 out of 711 employees were given a minimum of 2 days and a maximum of 12 days of unpaid leave, and wages were deducted from the employees for these days not worked. This is not in accordance with local law. (weaving, sewing sections).</p> <p>GE#2 Meal and transportation are provided free of charge.</p> <p>GE#3 Bonus payment is made to the employees of the weaving department when the production exceeds the target production capacity.</p> <p>GE#4 Food packages are given to all employees every Ramadan.</p> <p>GE#5 In order to encourage the continuity of the employees, 300 TL absenteeism bonus is given.</p> <p>GE#6 The facility provides a 25% discount to employees from a private hospital.</p> <p>GE#7 The facility provides 1 day of paid leave in case of death of the 2nd degree relatives of the employees.</p>
6	<u>Working Hours</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	2	0	0	<p>NC#3 It was noted that some employees were resting for less than 11 hours between two shifts.</p>

									<p>(Weaving, sewing, warehouse sections). According to the management statement; production was stopped for 10 days due to the earthquake that occurred on 06.02.2023. Therefore, in March 2023, due to the expected delivery of the order, overtime work was carried out on the</p> <p>Mart 2023; 25 out of 42 employees max 2 times/month, max 8 hours/day. July 2022: Not Observed April 2022: Not Observed</p> <p>NC#4 It was noted that some of employees work on their weekly holiday in the peak seasons. (Weaving, sewing, warehouse sections). According to the management statement; production was stopped for 10 days due to the earthquake that occurred on 06.02.2023. Therefore, in March 2023, due to the expected delivery of the order, overtime work was carried out on the weekends.</p> <p>March 2023, 36 out of 42 employees, max 2 kez/ month, min. 7, max. 23 days July 2022: Not Observed April 2022: Not Observed</p>
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None observed
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None observed
8A	<u>Sub-Contracting and</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None observed

	<u>Homeworking</u>								
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None observed
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None observed
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	Not Applicable
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	1	GE#8 The facility has solar panels that produce electricity.
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None observed

General observations and summary of the site:

OZKAPLAN IPEK HALI TEKSTIL SAN. VE TIC. A.S. was established in 2003. The facility has been in this building since 06.12.2019. The building is reinforced concrete. Total closed area of the facility is 38588,25 m².
 Carpets are produced in the facility.
 Main processes are weaving, finishing, labelling, sewing, packing.

Regular working hours are as follows:
 For weaving section;
 3 shift 07:00-15:00, 15:00-23:00 and 23:00-07:00 (Inc. 30' lunch break) from Monday to Saturday.
 For sewing, finishing, labelling, packing sections:
 2 shift; 7:00-15:00, 15:00-23:00 (Inc. 30' lunch break) from Monday to Saturday.
 1 shift;
 For administrative employees:
 08:15-18:15 (Inc. 60' lunch break and 15'x2 tea breaks) from Monday to Friday.

HATUN BATLICANCI – QUALITY AND SOCIAL COMPLIANCE RESPONSIBLE is responsible for fulfilling the standards related to social compliance in the facility.

There are a total of 711 employees (75 administration(47 female and 28 male), 636 production(0 female and 636 male);
 (pregnant employee: 1, disabled employee: 20, maternity leave: 1, ISKUR employees: 0, migrant employees: 0, young employee: 0)
 The youngest worker' age is 18 years old.

There is no union at this facility.

Peak month: September, July

12 workers were selected for interview including 1 female and 11 male employees, they were interviewed individually. And, 6 groups of 5 group interviews conducted as well.

12 months of records were provided for review. (1 April 2022 – 31 March 2023).

42 employees' attendance records and payroll records of March 2023 (last paid month), July 2022 (peak month) and April 2022 (non-peak month) were reviewed.

According to the documents examined at least legal minimum pay was paid to all workers ;

At least legal minimum wage was paid to all workers,

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

Since July 1st 2022: 6471TL/Month (Gross); 5500 TL/Month (Net)

Since January 1st 2023: 10008 TL/Month (Gross); 8506 TL/Month (Net)

Max Overtime in the sampled months:

March 2023: 40 Hours/Month

July 2022: 25 Hours/Month

April 2022: 20 Hours/Month

There is no service provider (contractor) at the facility.

Coronavirus measures:

Covid-19 risk assessment is available.

Social distancing measures are taken all over the facility including the lunch hall.

There are posters attached in several places in the facility.

All the personnel were given appropriate training regarding coronavirus.

Audit Process

At 09:30 am on 2nd May 2023, EMINE IDIS - LEAD AUDITOR and EMRE AKDEMIR – TEAM AUDITOR entered the facility then held an opening meeting according to the ETI Base Code; the facility management was present in the meeting. Opening and closing meeting was held with HATUN BATLICANCI – QUALITY AND SOCIAL COMPLIANCE RESPONSIBLE, BURCU DEMIR – H&R EXECUTIVE, GULSAH DARIGA – H&S EXPERT, MEHMET KAPLAN – ADMINISTRATIVE REPRESENTATIVE.

Issues found**NC's****LIVING WAGES ARE PAID No:5****NC#1**

According to the document review and management statement, it was seen that the meal and travel fee were not included in the calculation of the compensation payments made.

NC#2

According to document control and management interview; Production was stopped in April 2022 due to the employer's inability to provide employment. 133 out of 711 employees were given a minimum of 2 days and a maximum of 12 days of unpaid leave, and wages were deducted from the employees for these days not worked. This is not in accordance with local law. (weaving, sewing sections).

WORKING HOURS No:6**NC#3**

It was noted that some employees were resting for less than 11 hours between two shifts. (Weaving, sewing, warehouse sections). According to the management statement; production was stopped for 10 days due to the earthquake that occurred on 06.02.2023. Therefore, in March 2023, due to the expected delivery of the order, overtime work was carried out on the

Mart 2023; 25 out of 42 employees max 2 times/month, max 8 hours/day.

July 2022: Not Observed

April 2022: Not Observed

NC#4

It was noted that some of employees work on their weekly holiday in the peak seasons. (Weaving, sewing, warehouse sections).

According to the management statement; production was stopped for 10 days due to the earthquake that occurred on 06.02.2023. Therefore, in March 2023, due to the expected delivery of the order, overtime work was carried out on the weekends.

March 2023,
36 out of 42 employees, max 2 kez/ month, min. 7, max. 23 days
July 2022: Not Observed
April 2022: Not Observed

Good Examples**HEALTH AND SAFETY No:3****GE#1**

Periodic controls of lifting and conveying vehicles are carried out once every 3 months.

Wage and Benefits No:5**GE#2**

Meal and transportation are provided free of charge.

GE#3

Bonus payment is made to the employees of the weaving department when the production exceeds the target production capacity.

GE#4

Food packages are given to all employees every Ramadan.

GE#5

In order to encourage the continuity of the employees, 300 TL absenteeism bonus is given.

GE#6

The facility provides a 25% discount to employees from a private hospital.

GE#7

The facility provides 1 day of paid leave in case of death of the 2nd degree relatives of the employees.

ENVIRONMENT No:10B-4**GE#8**

The facility has solar panels that produce electricity.

**Please note the table above records the total number of Non-compliances (NC), Observations (Obs) and Good Examples (GE). This gives the reviewer an indication of problem areas but does not detail severities of each issue – Reviewers need to check audit results by clause.*

Site Details

Site Details		
A: Company Name:	OZKAPLAN IPEK HALI TEKSTIL SANAYI VE TICARET A.S.	
B: Site name:	OZKAPLAN IPEK HALI TEKSTIL SANAYI VE TICARET A.S.	
C: GPS location: (If available)	GPS Address: BASPINAR (ORGANIZE) OSB MAHALLESİ OSB 4. BOLGE 83413 NO: 9/10 SEHIT KAMIL -GAZIANTEP	Latitude: 37°09'23.5"N Longitude: 37°23'28.8"E
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p>OPENING AND OPERATING BUSINESS LICENSE 1st address: 06.12.2019-564 2nd address: 02.11.2021-664</p> <p>No validity time for this licence.</p>	
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	<p>Carpets are produced in the facility. Main processes are weaving, finishing, labelling, sewing, packing.</p>	
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>OZKAPLAN IPEK HALI TEKSTIL SAN. VE TIC. A.S. was established in 2003. The facility has been in this building since 06.12.2019. The building is reinforced concrete. Total closed area of the facility is 38588,25 m². Carpets are produced in the facility.</p> <p>Main processes are weaving, finishing, labelling, sewing, packing.</p>	

	Production Building no1	Description	Remark, if any
	ENTRANCE	WEAVING SECTION, CONFECTION SECTION, DOCTOR ROOM, LUNCH HALL, WAREHOUSES, MEZZANINE FLOOR (ADMINISTRATION OFFICES)	NONE
	Production Building no 2 Administrative Building	Description	Remark, if any
	1 st floor	offices	NONE
	2 nd floor	Management offices	NONE
	3 rd floor	Management offices	NONE
	Is this a shared building?	NO	NONE
<p>For below, please add any extra rows if appropriate.</p> <p>F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: No large cracks were observed</p> <p>F3: Does the site have a structural engineer evaluation? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>F4: Please give details: The facility has construction permit.</p>			
G: Site function:	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor		
H: Month(s) of peak season: (if applicable)	September, July		

<p>I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)</p>	<p>The facility have weaving and confection tables for all sections. 32 machines, finishing machines, carpet cushioning machine, transfer machine, carpet width cutting machine, carpet length cutting machine, 2 carpet packing machines, 3 carpet barcode readers, 3 carpet surface lines, 4 carpet surface lines, 12 carpet lines conveyor, 4 full automatic labels overlock machines, 1 carpet labeling machine, 4 carpet fence machines, 1 double stage loading belt, 5 automatic carpet & roller winding machines, 1 automatic carpet packaging, 1 automatic carpet packaging machine, 1 carpet packaging machine 3 compressors, 1 mechanical fire equipment</p>
<p>J: What form of worker representation / union is there on site?</p>	<p><input type="checkbox"/> Union (name) <input type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (Open door policy, worker representative, suggestion box) <input type="checkbox"/> None</p>
<p>K: Is there any night production work at the site?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>L: Are there any on site provided worker accommodation buildings e.g. dormitories</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation , N/A</p>
<p>M: Are there any off site provided worker accommodation buildings</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers, N/A</p>
<p>N: Were all site-provided accommodation buildings included in this audit</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: If no, please give details : There is no accommodation</p>

Audit Parameters			
A: Time in and time out	Day 1 Time in: 09:30 Day 1 Time out: 17:30	Day 2 Time in: 09:00 Day 2 Time out: 16:00	Day 3 Time in: N/A Day 3 Time out: N/A
B: Number of auditor days used:	(2 AUDITOR X 1 DAY) + (1 AUDITOR x 1,5 DAYS) = (3,5 MANDAYS)		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define N/A		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail: weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: If No, why not?		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause, N/A		
G: Who signed and agreed CAPR (Name and job title)	HATUN BATLICANCI –QUALITY AND SOCIAL COMPLIANCE RESPONSIBLE		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	SMETA 4 PILLAR		
J: Previous audit type:	10-11.02.2022		
K: Were any previous audits reviewed for this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives

A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	There was no worker committee at the facility. There were 6 worker representatives at the facility. 1 employee representative was included interview. Due to the production intensity, the employee representative could not attend the opening meeting. However, 1 employee representative attended the closing meeting.		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	N/A. There was no union at 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.

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	664	0	0	0	0	0	0	664
Worker numbers – female	47	0	0	0	0	0	0	47
Total	711	0	0	0	0	0	0	711
Number of Workers interviewed – male	41	0	0	0	0	0	0	41
Number of Workers interviewed – female	1	0	0	0	0	0	0	1
Total – interviewed sample size	42	0	0	0	0	0	0	42

A: Nationality of Management	TURKISH	
<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first.</p> <p><i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities:</p> <p>B1: Nationality 1: TURKISH</p> <p>B2: Nationality 2: _____</p> <p>B3: Nationality 3: _____</p>	<p>Was the list completed during peak season?</p> <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods: The list does not change during peak seasons.</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx % total workforce: Nationality 1 TURKISH</p> <p>C1: approx % total workforce: Nationality 2 _____</p> <p>C2: approx % total workforce: Nationality 3 _____</p>	
D: Worker remuneration (management information)	<p>D: _____% workers on piece rate</p> <p>D1: 100 % hourly paid workers</p> <p>D2: _____% salaried workers</p> <p>Payment cycle:</p> <p>D3: _____% daily paid</p> <p>D4: _____% weekly paid</p> <p>D5: 100 % monthly paid</p> <p>D6: _____% other</p> <p>D7: If other, please give details</p>	

Worker Interview Summary		
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	6 groups of 5	
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 11	D2: Female: 1
E: 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. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details : N/A	
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent	
H: What was the most common worker complaint?	None	
I: What did the workers like the most about working at this site?	Positive attitude of the management, payments being on time, working hours and friendship at work.	
J: Any additional comment(s) regarding interviews:	None	
K: Attitude of workers to hours worked:	Employees stated that they were satisfied with their working hours.	
L. Is there any worker survey information available?		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details: N/A		
M: Attitude of workers:		

(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk

The general attitude of employees towards working conditions was positive. They were pleased with the attitude of managers, working environment and general conditions. Payments are always on time. There is no harassment, discrimination, abuse or forced labour.

N: Attitude of worker's committee/union reps:

(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk

No negative comments were noted during the worker representative interview.

O: Attitude of managers:

(Include attitude to audit, and audit process. Both positive and negative information should be included)

Management was helpful throughout the audit process.

Audit Results by Clause

0A: Universal Rights covering UNGP

[\(Click here to return to summary of findings\)](#)

0.A. Guidance for Observations

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:

The facility has a policy covering human rights impacts and issues, and it is communicated to all appropriate parties, including its own suppliers.

Social compliance responsible is HATUN BATLICANCI –QUALITY AND SOCIAL COMPLIANCE RESPONSIBLE

The facility has grievance mechanism for both internal and external business partners.

The facility management has posted ETI Base code on the notice board.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

Social compliance policy and related procedures

Authorization letter of social compliance responsible

Supplier chain mapping

Supplier and Subcontractors choosing and evaluating procedure

Grievance Mechanism Feedbacks

Management interview

Employees' interviews

Any other comments: None

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: The facility has detailed social compliance policy that includes human rights.</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: HATUN BATLICANCI Job title: QUALITY AND SOCIAL COMPLIANCE RESPONSIBLE</p>
<p>C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: The facility has suggestion boxes placed at several places.</p>
<p>D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details: N/A</p>
<p>E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The facility has detailed privacy procedures for worker's information. In addition to that, the feedback obtained from the suggestion boxes is evaluated by the management in a confidential manner.</p>

Findings		
<p>Finding: Observation <input type="checkbox"/> Company NC <input type="checkbox"/></p> <p>Description of observation:</p> <p>None observed</p> <p>Local law or ETI/Additional elements / customer specific requirement:</p> <p>Not applicable</p> <p>Comments: Not applicable</p>		<p>Objective evidence observed:</p> <p>Not applicable</p>

Good examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p>Objective Evidence Observed:</p> <p>Not applicable</p>

Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 2022 52 %	A2: This year : 2023 12 %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	12 %	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 2022 7 %	C2: This year : 2023 5 %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	5 %	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: 12-month work accident records were reviewed.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: 2022 Number: 21	F2: This year: 2023 Number:6
G: 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]	6	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 2022 0,54 %	H2: This year: 2023 0,13 %
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 0 % workers	I2: 12 months 0 % workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months 0 % workers	J2: 12 months 0 % workers

0B: Management system and Code Implementation

[\(Click here to return to summary of findings\)](#)

0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.
 0.B.2 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.3 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.
 0.B.4 Suppliers are expected to communicate this Code to all employees.
 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 workplace rules. All of them are attached on the notice board.
 All social compliance issues are managed and monitored internally.
 The facility management has posted ETI Base code on notice boards.
 Overall responsibility for meeting the standards is taken by HATUN BATLICANCI –QUALITY AND SOCIAL COMPLIANCE RESPONSIBLE

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:
 Management interview
 Employees' interviews
 Training records
 Company policies

Any other comments: None

Management Systems:

<p>A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: Please give details: N/A</p>
<p>B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Policies and procedures about reducing the risk of forced labour, child labour, discrimination and harassment & abuse are available.</p>
<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>Policies exist for all areas social compliance (Forced labour, Health and Safety, Wages,</p>

	<p>Working Hours, and No harsh treatment, Environment, Business Ethics, Child Labour, Recruitment, Discrimination and Sub-contracting.). These are communicated to the employees by attaching them on the notice boards.</p> <p>Based on document review and worker interviews it is identified that the policy on 'No harsh treatment and Environment' is in compliance with the code.</p> <p>Workers stated that there was no forced labour, no child labour. Managers and supervisors consist of both male and female genders.</p>
<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D1: Please give details: These policy and procedures are communicated to the employees by attaching them on the notice boards.</p>
<p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>E1: Please give details: Training records are available.</p>
<p>F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>F1: Please give details: ISO 9001;2015 28.06.2023 (Validity date)</p>
<p>G: Is there a Human Resources manager/department? If Yes, please detail.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>G1: Please give details: BURCU DEMIR– HUMAN RESOURCES RESPONSIBLE</p>
<p>H: Is there a senior person / manager responsible for implementation of the code</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>H1: Please give details: HATUN BATLICANCI – QUALITY AND SOCIAL COMPLIANCE RESPONSIBLE</p>
<p>I: Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>I1: Please give details: All worker information is kept in their personnel files. These files are kept in the administration office in a confidential manner.</p>
<p>J: Is there an effective procedure to ensure confidential information is kept confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>J1: Please give details: All worker information is kept in their personnel files. These files are kept in</p>

	the administration office in a confidential manner. The law on the protection of personal data is complied with.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Health and Safety Risk assessment includes policy and procedures effectiveness.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1 Please give details: The facility performs a corrective action plan for the headings which are addressed in the risk assessment.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: The facility has a policy.
Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: The facility has opening and operating licence.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: The facility is the owner of the building, the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: If yes, how does the company obtain FPIC: The facility has environmental impact assessment. The facility main production processes is not risky regarding land rights.
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input type="checkbox"/> Yes <input type="checkbox"/> No NA Q1: Please give details: The facility is the owner of the land and the building.
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: In case a land acquisition, the facility applies to municipality and fulfil the obligations regarding

	environmental impact assessment, construction permit etc.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details: Facility has a rent contract

Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed Local law and/or ETI requirement: Not applicable Recommended corrective action: Not applicable	Objective evidence observed: Not applicable

Observation:	
Description of observation: None observed Local law or ETI requirement: Not applicable Comments: Not applicable	Objective evidence observed: Not applicable

Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed: Not applicable

1: Freely Chosen Employment

[\(Click here to return to summary of findings\)](#)

ETI

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:

The factory has a policy against forced labour and the policy was reviewed by auditor.
 There was a non-formalised application procedure which states that workers must present their ID's.
 There was no forced or bonded labour at the company.
 Movement of employees at the facility were not limited.
 Employees have free access to toilets and drinkable water.
 Overtimes are always performed on voluntary basis.
 Employment was freely chosen.
 Workers were free to leave and were not required to lodge deposits or ID papers with their employers.
 The above was confirmed in management and worker interview.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Policy documents
- Worker interviews
- Personnel files and pay-slips
- Disciplinary records
- Employee interviews
- Labour contracts

Any other comments: None

<p>A: Is there any evidence of retention of original documents, e.g. passports/ID's</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, please give details and category of workers affected:</p>
<p>B: Is there any evidence of a loan scheme in operation</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please give details and category of worker affected:</p>
<p>C: Is there any evidence of retention of wages /deposits</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of worker affected:</p>
<p>D: Are there any restrictions on workers' freedom to terminate employment?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding: N/A</p>

E: 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'?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding:
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding: N/A
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected:
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: The facility has a detailed procedure regarding this issue includes reducing the risk of forced/trafficked labour.

Non-compliance:	
<p>1. Description of non-compliance:</p> <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:	<p>Objective evidence observed:</p> <p>Not applicable</p>
<p>None observed</p> <p>Local law and/or ETI requirement: Not applicable</p> <p>Recommended corrective action: Not applicable</p>	

Observation:	
<p>Description of observation: None observed</p> <p>Local law or ETI requirement: Not applicable</p> <p>Comments: Not applicable</p>	<p>Objective evidence observed:</p> <p>Not applicable</p>

Good Examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p>Objective evidence observed:</p> <p>Not applicable</p>

2: Freedom of Association and Right to Collective Bargaining are Respected

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ETI

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 Trade Union in the facility. Company does not restrict workers to join or form any union which is asked during interviews.
 There was an open-door policy in operation at the company. Employees may appeal their grievances or suggestions directly to their supervisors. Also, employees stated that they can use suggestion boxes to express their opinions and they can share the issues with Worker Representative.
 There are 6 worker representatives or general working conditions.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:
 Management interview
 Workers' interviews
 Worker representative interview
 Suggestion box records
 Policy of the facility regarding Freedom of Association.

Any other comments: None

A: What form of worker representation/union is there on site?	<input type="checkbox"/> Union (name) <input type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (Open-door policy, worker representative, suggestion boxes) <input type="checkbox"/> None
B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<p>D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D1: Please give details: Employees declared that they can go directly to the management for their suggestions whenever they want. In addition to this, suggestion boxes are placed in several places of the company.</p> <p>D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes (for worker representative) <input type="checkbox"/> No</p>	
<p>E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>E1: Please give details: The supplier does provide adequate facilities to allow the worker representative and the workers to conduct the related activities.</p>	
<p>F: Name of union and union representative, if applicable:</p>	<p>There is no union at the facility.</p>	<p>F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p>
<p>G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?</p>	<p>There are 6 worker representatives, open door policy and suggestion boxes in the facility.</p>	<p>G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>H: Are all workers aware of who their representatives are?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>All the workers know who their representatives are.</p>
<p>I: Were worker representatives freely elected?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>I1: Date of last election: 16.10.2020</p>
<p>J: Do workers know what topics can be raised with their representatives?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>The workers are aware what topics can be raised with their representatives.</p>	
<p>K: Were worker representatives/union representatives interviewed?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, please state how many: 1</p>	
<p>L: Please describe any evidence that union/worker's committee is effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i></p>	<p>N/A There is no union or worker committee at the facility.</p>	
<p>M: Are any workers covered by Collective Bargaining Agreement (CBA)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	
<p>If Yes, what percentage by trade Union/worker representation</p>	<p>M1: <u>N/A</u>% workers covered by Union CBA</p>	<p>M2: <u>N/A</u>% workers covered by worker rep CBA</p>

M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes N/A <input type="checkbox"/> No
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Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed Local law and/or ETI requirement: Not applicable Recommended corrective action: Not applicable	Objective evidence observed: Not applicable

Observation:	
Description of observation: None observed Local law or ETI requirement: Not applicable Comments: Not applicable	Objective evidence observed: Not applicable

Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed: Not applicable

3: Working Conditions are Safe and Hygienic

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ETI

- 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:

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.
- Ventilation, temperature and lighting were adequate for the production processes.
- Health certificates for kitchen operators and the hygiene certificate for the kitchen was up-to-date and legal.
- Risk assessment was observed.
- Emergency case plans were provided inside the facility.
- Minutes of meetings show that there are meetings once every month between the H&S committee (workers) and the H&S manager, and each point is acted on.

Fire Safety

- Firefighting equipment are adequate and checks were up-to-date.
- Fire drills were organised and recorded.

Electrical safety

- All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards.

Chemical safety

- All chemicals were correctly labelled.
- Workers had been trained on chemical procedures as well as what to do in an emergency.

Coronavirus measures:

- Covid-19 risk assessment is available.
- Social distancing measures are taken all over the facility including the lunch hall.
- There are posters attached in several places in the facility.
- The temperature of the workers and visitors are measured at the entrance gate.
- All the personnel were given appropriate training regarding coronavirus.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Health and safety policy
- Health and safety manual
- Health and safety committee minutes
- Periodic maintenance records
- Health check records
- Training records.
- Accident reports
- Potable water testing certificates
- Risk assessment report

Any other comments: None

<p>A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: The facility has Health & Safety Procedures and these procedures are shared with employees via trainings.</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The facility has a detailed Health & Safety procedure and this procedure is explained in Health and Safety trainings to employees.</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: There was no structural addition of the building without permit.</p>
<p>D: Are visitors to the site informed on H&S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: This information is provided by H&S specialist.</p>
<p>E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The facility has a doctor room and the room is suitable for the number of workers.</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: Yes: There is a doctor and an infirmary. The facility is in a hazardous category and number of first aid certified employees are sufficient. (53)</p>
<p>G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: All transportation vehicles have insurance and all drivers has professional competence certificate (SRC).</p>

H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H1: Please give details: There is no accommodation.
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: The risk assessment has working hours section.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: The facility is meeting its legal obligations on environmental requirements. They have related documents.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: No banned chemical is used by the facility.

Non-compliance:	
<p>1. Description of non-compliance:</p> <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed Local law and/or ETI requirement: Not applicable Recommended corrective action: Not applicable	<p>Objective evidence observed:</p> Not applicable

Observation:	
<p>Description of observation: None observed Local law or ETI requirement: Not applicable Comments: Not applicable</p>	<p>Objective evidence observed:</p> Not applicable

Good Examples observed:	
<p>Description of Good Example (GE):</p> <p>GE#1 Periodic controls of lifting and conveying vehicles are carried out once every 3 months.</p>	<p>Objective evidence observed:</p> Document Review

4: Child Labour Shall Not Be Used

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[\(Click here to return to Key Information\)](#)

ETI

- 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:

According to the employee interviews and management interview it is identified that the minimum age in the facility 18.
 No historical child labour was noted based on documents review.
 Employees' personnel files include recent photos and age verification documents which are in the form of photocopied ID cards.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:
 ID Copies of employees
 Personnel file
 Child labour policy
 Management and employee interviews

Any other comments: None

A: Legal age of employment:	15
B: Age of youngest worker found:	18
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0 %
E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details

Non-compliance:	
<p>1. Description of non-compliance:</p> <p><input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law</p> <p><input type="checkbox"/> NC against customer code:</p> <p>None observed</p> <p>Local law and/or ETI requirement: Not applicable</p> <p>Recommended corrective action: Not applicable</p>	<p>Objective evidence observed:</p> <p>Not applicable</p>

Observation:	
<p>Description of observation: None observed</p> <p>Local law or ETI requirement: Not applicable</p> <p>Comments: Not applicable</p>	<p>Objective evidence observed:</p> <p>Not applicable</p>

Good Examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p>Objective evidence observed:</p> <p>Not applicable</p>

5: Living Wages are Paid

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key information\)](#)

ETI

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:

All employees are registered with the social insurance agency.

There are no employees paid below the legal minimum wage.

Payslip is given to the employees.

All workers are 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.

Annual leaves are used by the employees properly.

Wages are paid on 10th of each month.

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

According to the documents examined at least legal minimum pay was paid to all workers ;

At least legal minimum wage was paid to all workers,

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

Since July 1st 2022: 6471TL/Month (Gross); 5500 TL/Month (Net)

Since January 1st 2023: 10008 TL/Month (Gross); 8506 TL/Month (Net)

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

Payment records

Time records

Leave records

Social insurance records

Employees' & management interviews

Labour contracts

Any other comments: None

Non-compliance:

1. Description of non-compliance:

- NC against ETI/Additional Elements NC against Local Law
 NC against customer code:

NC#1

According to the document review and management statement, it was seen that the meal and travel fee were not included in the calculation of the compensation payments made.

Local law and/or ETI requirement:

Turkish Labor Law # 4857 / 22.5.2003, Repealed provisions; Article 120: Other articles were repealed except for the 14th article of the Labor Law dated 25.8.1971 and numbered 1475.

Turkish Labor Law # 1475 / 25.8.1971, Article 14, (Changes on 29/7/1983 – 2869/3. Art): In the calculation of the compensation mentioned in Article 13 and the wage that will be the basis for the severance pay in this article, the money provided to the worker and the benefits arising from the contract and law that can be measured in money are also taken into consideration.

ETI Base Code 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.

Recommended corrective action: Please provide that calculation / compensation payments are made in accordance with the law

2. Description of non-compliance:

- NC against ETI/Additional Elements NC against Local Law
 NC against customer code:

NC#2

According to document control and management interview; Production was stopped in April 2022 due to the employer's inability to provide employment. 133 out of 711 employees were given a minimum of 2 days and a maximum of 12 days of unpaid leave, and wages were deducted from the employees for these days not worked. This is not in accordance with local law. (weaving, sewing sections).

Local law and/or ETI requirement:

In accordance with Turkish Labour Law # 4857 / 2003, ARTICLE 53-Any worker completing at least one year service period, including the trial period, is granted a paid annual leave.

The worker may not waive the right of paid annual leave.

The provisions of this Law relating to paid annual leaves may not be applied to the workers employed in seasonal and campaign works less than one year due to their qualifications.

The paid annual leaves to be granted to the workers may not be less than;
 a) 14 working days for those having service period 1 to 5 years (incl.)

Objective evidence observed:

Document Review,
Management Interview

Document Review,
Management Interview

<p>b) 20 working days for those having service period more than five less than fifteen years, c) 26 working days for those having service period fifteen years (incl.) and over. However, the paid annual leaves granted to the workers of 18 years age or under and fifty years age and over, may not be less than twenty working days. The annual leave periods may be increased by labour contracts and collective labour agreements.</p> <p>ETI Base Code 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.</p> <p>Recommended corrective action: Please make full payment to the employee in accordance with the local law, in cases where the management cannot provide the job acquisition, and do not deduct the progress payment (salary, annual leave, social security premium, etc.) from the employee in accordance with the debts law.</p>	
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Observation:	
<p>Description of observation: None observed</p> <p>Local law or ETI requirement: Not applicable</p> <p>Comments: Not applicable</p>	<p>Objective evidence observed:</p> <p>Not applicable</p>

Good Examples observed:	
<p>Description of Good Example (GE):</p> <p>GE#2 Meal and transportation are provided free of charge.</p> <p>GE#3 Bonus payment is made to the employees of the weaving department when the production exceeds the target production capacity.</p> <p>GE#4 Food packages are given to all employees every Ramadan.</p> <p>GE#5 In order to encourage the continuity of the employees, 300 TL absenteeism bonus is given.</p> <p>GE#6 The facility provides a 25% discount to employees from a private hospital.</p> <p>GE#7 The facility provides 1 day of paid leave in case of death of the 2nd degree relatives of the employees.</p>	<p>Objective Evidence Observed:</p> <p>Document Review & Employee Interviews</p>

Summary Information

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
<p>A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i></p>	<p>Legal maximum: 45 hours/week</p>	<p>A1: 45 hours/week</p>	<p>A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N/A There is no CBA in the facility.</p>
<p>B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i></p>	<p>Legal maximum: 11 total working hours per day (regular + overtime), 270 overtime hours per year</p>	<p>B1: Maximum 15 total working hours per day (regular + overtime)</p> <p>Highest overtime hours:</p> <p>March 2023: 40 Hours/Month</p> <p>July 2022: 25 Hours/Month</p> <p>April 2022: 20 Hours/Month</p>	<p>B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N/A There is no CBA in the facility.</p>
<p>C: Wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i></p>	<p>Legal minimum: Since January 1st 2022: 5004,00 TL. (Gross) / month); 4253,40 TL (Net / month). Since July 1st 2022: 6471TL/Month (Gross); 5500 TL/Month (Net) Since January 1st 2023: 10008 TL/Month (Gross); 8506 TL/Month (Net)</p>	<p>C1: The minimum wage paid to the employees at the facility is; Since January 1st 2022: 5004,00 TL. (Gross) / month); 4253,40 TL (Net / month). Since July 1st 2022: 6471TL/Month (Gross); 5500 TL/Month (Net) Since January 1st 2023: 10008 TL/Month</p>	<p>C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N/A There is no CBA in the facility.</p>

		(Gross); 8506 TL/Month (Net)	
D: Overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: 150% for overtime in weekdays and weekends. Overtime premium for national/religious holidays is 200% (The employee gets one day salary for the related national holiday even though she/he does not work on this day. If she/he work, then additional 1 day salary is given to him/her; so the rate totally paid to him/her became 200% in case of doing overtime in national /religious holidays)	D1: 150% for overtime in weekdays and weekends. Overtime premium for national/religious holidays is 200% (The employee gets one day salary for the related national holiday even though she/he does not work on this day. If she/he work, then additional 1 day salary is given to him/her; so the rate totally paid to him/her became 200% in case of doing overtime in national /religious holidays)	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N/A There is no CBA in the facility.

Wages analysis: (Click here to return to Key Information)	
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
A1: If No , why not?	N/A
B: Sample Size Checked <i>(State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	<p>12 workers were selected for interview including 1 female and 11 male employees, they were interviewed individually. And, 6 groups of 5 group interviews conducted as well.</p> <p>12 months of records were provided for review. (1 April 2022 – 31 March 2023). 42 employees' attendance records and payroll records of March 2023 (last paid month), July 2022 (peak month) and April 2022 (non-peak month) were reviewed.</p>

<p>C: Are there different legal minimum wage grades? If Yes, please specify all.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>C1: If Yes, please give details: N/A</p>	
<p>D: If there are different legal minimum grades, are all workers graded and paid correctly?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<p>D1: If No, please give details: N/A</p>	
<p>E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?</p>	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	<p>E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> Since January 1st 2023: 10008 TL/Month (Gross); 8506 TL/Month (Net)</p>	
<p>F: Please indicate the breakdown of workforce per earnings:</p>	<p>F1: <u> 0 </u> % of workforce earning under minimum wage F2: 12 % of workforce earning minimum wage F3: 88 % of workforce earning above minimum wage</p>		
<p>G: Bonus Scheme found: Please specify details:</p>	<p>Bonus Scheme found: Bonus payments are done by facility. GE#3 Bonus payment is made to the employees of the weaving department when the production exceeds the target production capacity. GE#5 In order to encourage the continuity of the employees, 300 TL absenteeism bonus is given. <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i></p>		
<p>H: What deductions are required by law e.g. social insurance? Please state all types:</p>	<p>Social insurance and taxes</p>		
<p>I: Have these deductions been made?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>I1: Please list all deductions that have been made.</p>	<p>1.Tax 2.Social Insurance Please describe: Legal deductions</p>
		<p>I2: Please list all deductions that have not been made.</p>	<p>1. Meal 2. Transportation Please describe: Provided free</p>
<p>J: Were appropriate records available to verify hours of work and wages?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
<p>K: Were any inconsistencies found? (if yes describe nature)</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>K1: Type N/A</p>	

		<input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: All attendance records reflect all time worked.	
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time: The facility has not calculated living wage.	
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details: N/A - The facility has not calculated living wage.	
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: Please give details: N/A	
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: It was confirmed through employee and management interviews and payment, time record documents review; equal rates are paid for equal work.	
Q: How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain:	

6: Working Hours are not Excessive

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

ETI

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:

- this is allowed by national law;
- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
- appropriate safeguards are taken to protect the workers' health and safety; and
- The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

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:

Regular working hours are as follows:

For weaving section;

3 shift 07:00-15:00, 15:00-23:00 and 23:00-07:00 (Inc. 30' lunch break) from Monday to Saturday.

For sewing, finishing, labelling, packing sections:

2 shift; 7:00-15:00, 15:00-23:00 (Inc. 30' lunch break) from Monday to Saturday.

1 shift;

For administrative employees:

08:15-18:15 (Inc. 60' lunch break and 15'x2 tea breaks) from Monday to Friday.

12 workers were selected for interview including 1 female and 11 male employees, they were interviewed individually. And, 6 groups of 5 group interviews conducted as well.

12 months of records were provided for review. (1 April 2022 – 31 March 2023).
 42 employees' attendance records and payroll records of March 2023 (last paid month), July 2022 (peak month) and April 2022 (non-peak month) were reviewed.

All overtime work is voluntary.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

Attendance records of employees were reviewed.

Interviews were conducted with employee and management.

Any other comments: None

Non-compliance:

1. Description of non-compliance:

NC against ETI NC against Local Law NC against customer code:

NC#3

It was noted that some employees were resting for less than 11 hours between two shifts. (Weaving, sewing, warehouse sections). According to the management statement; production was stopped for 10 days due to the earthquake that occurred on 06.02.2023. Therefore, in March 2023, due to the expected delivery of the order, overtime work was carried out on the

Mart 2023; 25 out of 42 employees max 2 times/month, max 8 hours/day.

July 2022: Not Observed

April 2022: Not Observed

Local law and/or ETI requirement:

In accordance with the Turkish Regulation on the Occupationals which are carried out by working of employees on shifts , art 9

The employees who work in shift should have at least 11 hours uninterrupted rest.

ETI Base 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.

Recommended corrective action: Please make sure that resting for employees at least 11 hours between two shifts.

2. Description of non-compliance:

NC against ETI NC against Local Law NC against customer code:

NC#4

It was noted that some of employees work on their weekly holiday in the peak seasons. (Weaving, sewing, warehouse sections).

Objective evidence observed:

Document review,
 employee interviews,
 management interview

<p>According to the management statement; production was stopped for 10 days due to the earthquake that occurred on 06.02.2023. Therefore, in March 2023, due to the expected delivery of the order, overtime work was carried out on the weekends.</p> <p>March 2023, 36 out of 42 employees, max 2 kez/ month, min. 7, max. 23 days July 2022: Not Observed April 2022: Not Observed</p> <p>Local law and/or ETI requirement: Turkish Labour Law # 4857 / 2003, ARTICLE 46-The workers employed in the working places within the scope of this Law are granted at least twenty-four hours uninterrupted relaxation period (weekly holiday) within seven days time scale provided that they have executed worked during the working days fixed according to article 63. Turkish Labour Law # 4857 / 2003, ARTICLE 63- In general the duration of work shall be at the most 45 hours a week. This period shall be applied by dividing the same equally among the days of the week worked.</p> <p>ETI Base Code 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.</p> <p>Recommended corrective action: It is recommended to ensure that employees do not work on their weekly holiday.</p>	<p>Document review, employee interviews, management interview</p>
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Observation:	
<p>Description of observation: None observed</p> <p>Local law or ETI requirement: Not applicable</p> <p>Comments: Not applicable</p>	<p>Objective evidence observed:</p> <p>Not applicable</p>

Good Examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p>Objective Evidence Observed:</p> <p>Not applicable</p>

Working hours' analysis	
<p>Please include time e.g. hour/week/month (Go back to Key information)</p>	
Systems & Processes	
<p>A. What timekeeping systems are used: time card etc.</p>	<p><i>Describe:</i> There is face scanning system in the facility.</p>

<p>B: Is sample size same as in wages section?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details						
<p>C: Are standard/contracted working hours defined in all contracts/employment agreements?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details: N/A</p>					
<p>D: Are there any other types of contracts/employment agreements used?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>D1: If YES, please complete as appropriate:</p> <table border="1" data-bbox="687 712 1493 801"> <tr> <td><input type="checkbox"/> 0 hrs</td> <td><input type="checkbox"/> Part time</td> <td><input type="checkbox"/> Variable hrs</td> <td><input type="checkbox"/> Other</td> </tr> </table> <p>If "Other", Please define: N/A</p>		<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other
<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other				
<p>E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>E1: If yes, please detail hours, %, types of workers affected and frequency Please give details: N/A</p>					
<p>F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?</p>	<p>F2: Please select all applicable: <input type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input checked="" type="checkbox"/> No If 'No', please explain: Systematically workers are provided 1 day off in every 7 days. However some of employees work non-systematically on their weekly holiday. Please refer to NC</p>	<p>F3: Is this allowed by local law? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>					
<p>Maximum number of days worked without a day off (in sample):</p>							

	18 Days	
Standard/Contracted Hours worked		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency: N/A
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details: N/A
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Max Overtime in the sampled months: March 2023: 40 Hours/Month July 2022: 25 Hours/Month April 2022: 20 Hours/Month	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	25 %	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Employee interviews
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of standard wages: 150% for overtime in weekdays and Saturday. Overtime premium for Sunday and national/religious holidays is 200%.
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	N1: If yes, please describe % of workers & frequency: All employees who work overtime is paid monthly in accordance with the law. % of workers: 100%

		Frequency: Monthly
<p>O: 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.</p>	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other N/A	
	<p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p>	
	<p>N/A</p>	
<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p>	<input type="checkbox"/> Overtime is voluntary N/A <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify)	
	<p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p>	
	<p>NONE</p>	
<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>Q1: If yes, please give details:</p>	
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<input type="checkbox"/> Yes N/A <input type="checkbox"/> No	

7: No Discrimination is Practiced

[\(Click here to return to summary of findings\)](#)

ETI

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:

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

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

Personnel files

Pay slips

Disciplinary policy

Company social compliance policy

Employee interview

Any other comments: None

<p>A: Gender breakdown of Management + Supervisors (Include as one combined group)</p>	<p>A1: Male: 35 % A2: Female 65 %</p>
<p>B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:</p>	<p>#: 1 FOOD ENGINEER (QUALITY MANAGEMENT SYSTEMS). 3 INDUSTRIAL ENGINEER (PLANNING / FOREIGN TRADE UNIT). 1 ELECTRICAL ELECTRONICS ENGINEER (Foreign TRADE UNIT)</p>
<p>C: 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?:</p>	<p><input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found</p> <p>C1: Please give details: N/A</p>

Professional Development

A: What type of training and development are available for workers?	Discrimination policy and procedure training are given to employees. Also, discipline rules are explained.
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B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details: N/A
--	---

Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None Observed</p> <p>Local law and/or ETI requirement: Not applicable</p> <p>Recommended corrective action: Not applicable</p>	<p>Objective evidence observed: Not applicable</p>

Observation:	
<p>Description of observation: None Observed</p> <p>Local law or ETI requirement: Not applicable</p> <p>Comments: Not applicable</p>	<p>Objective evidence observed: Not applicable</p>

Good Examples observed:	
<p>Description of Good Example (GE): None Observed</p>	<p>Objective Evidence Observed: Not applicable</p>

8: Regular Employment Is Provided

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

ETI

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:

Employees' labour contracts were available in their personnel files.
 Labour contracts were in accordance with the laws and regulations.
 A copy of employment contract was given to employees.
 All employees were registered to the social security.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

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

Any other comments: None

Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None Observed</p> <p>Local law and/or ETI requirement: Not applicable</p> <p>Recommended corrective action: Not applicable</p>	<p>Objective evidence observed: Not applicable</p>

Observation:	
<p>Description of observation: None Observed</p> <p>Local law or ETI requirement: Not applicable</p> <p>Comments: Not applicable</p>	<p>Objective evidence observed: Not applicable</p>

Good Examples observed:	
<p>Description of Good Example (GE): None Observed</p>	<p>Objective Evidence Observed: Not applicable</p>

Responsible Recruitment

All Workers	
<p>A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?</p>	<p><input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions</p> <p>A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:</p>
<p>B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>B1: If yes, please describe details and specific category(ies) of workers affected:</p>

C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – C1: If other, please give details: N/A
D: If any checked, give details:	N/A

Migrant Workers:	
<i>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</i>	
A: Type of work undertaken by migrant workers:	There is no migrant employee in the facility.
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: NA B2: Total number of (outside of local country) recruitment agencies used: NA
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: NA C2: Observations: NA
D: Are Any migrant workers in skilled, technical, or management roles <i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, number and example of roles: NA

NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No No non-employee worker is available at the facility. N/A
B: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees N/A <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other B1 – If other, please give details:
C: If any checked, give details:	N/A

Agency Workers (if applicable) <i>(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.)</i>	
A: Number of agencies used (average):	A1: Names if available: N/A There is no agency worker at the facility.
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A There is no agency worker at the facility.
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A There is no agency worker at the facility.
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A D1: Please give details: There is no agency worker at the facility.
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A E1: Please give details: There is no agency worker at the facility.

Contractors:	
<i>Note: 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,</i>	
A: Any contractors on site?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If yes, how many contractors are present, please give details: NA
B: If Yes , how many workers supplied by contractors?	NA
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: NA
D: If Yes , please give evidence for contractor workers being paid per law:	NA

8A: Sub-Contracting and Homeworking

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

8A.1 There should be no sub-contracting unless previously agreed with the main client.

8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.

Note to auditor on homeworking:

Report on whether it is direct or via agents. How many workers, relationship with site and what control systems are in place.

Note to auditor on subcontracting: auditor should use this section for subcontractors of part made or wholly made finished goods, this section should not be used for raw material manufacturers unless instructed otherwise by customers

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 uses no subcontractor.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Production records

Management interview

Employee interview

Quality control, shipping documents review

Details: None

Non-compliance:

1. Description of non-compliance:

NC against ETI/Additional Elements

NC against Local Law

NC against customer code:

None Observed

Local law and/or ETI /Additional Elements requirement: Not applicable

Recommended corrective action: Not applicable

Objective evidence observed:

Not applicable

Observation:

Description of observation: None Observed

Local law or ETI/Additional elements requirement: Not applicable

Objective evidence observed:

Not applicable

Comments: Not applicable

Good Examples observed:	
Description of Good Example (GE): None Observed	Objective Evidence Observed: Not applicable

Summary of sub-contracting – if applicable	
<input checked="" type="checkbox"/> Not Applicable please x	
A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: Please describe: NA
B: If sub-contractors are used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No B1: If Yes , summarise details: NA
C: Number of sub-contractors/agents used:	0
D: Is there a site policy on sub-contracting?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: If Yes , summarise details: NA
E: What checks are in place to ensure no child labour is being used and work is safe?	NA

Summary of homeworking – if applicable			
<input checked="" type="checkbox"/> Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If Yes , summarise details: N/A		
B: Number of homeworkers	B1: Male: N/A	B2: Female: N/A	Total: N/A
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly N/A <input type="checkbox"/> Through Agents		C1: If through agents, number of agents:
			N/A
D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

E: How does the site ensure worker hours and pay meet local laws for homeworkers?	N/A
F: What processes are carried out by homeworkers?	N/A
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: N/A
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes N/A <input type="checkbox"/> No

9: No Harsh or Inhumane Treatment is Allowed

[\(Click here to return to summary of findings\)](#)

ETI

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.

Additional elements:

9.2 companies should provide access to a confidential grievance mechanism for all workers

<p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: 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.</p>
<p>B: If Yes, are workers aware of these channels and have access? Please give details.</p>	<p>Workers are aware of these channels. There are published, anonymous and/or open channels available for reporting any violations of Labour standards.</p>
<p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<p>Suggestion box, worker representatives, open door policy.</p>
<p>D: Which of the following groups is there a grievance mechanism in place for?</p>	<p><input checked="" type="checkbox"/> Workers <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input type="checkbox"/> Other D1: Please give details: Suggestion box, internal external grievance mechanism, worker representatives, open door policy are used for employees.</p>
<p>E: Are there any open disputes?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details: N/A</p>
<p>F: 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)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: If no, please give details: The facility uses the Info mail group on the website as an external grievance mechanism.</p>
<p>G: Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain</p>

<p>H: If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>H1: If no, please give details</p>
<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>I1: If yes, please give details</p>

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 compliant with the legal regulations.
 No disciplinary action was taken.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:
 Disciplinary regulation of the facility and the personnel files of the sampled employees were reviewed.
 Suggestion boxes check book was checked.
 Employee interview was conducted.
 The relevant policy on prevention of harassment and abuse.
 Internal grievance procedure documentation.
 Training records.

Any other comments: None

Non-compliance:

<p>1. Description of non-compliance:</p> <p><input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>None Observed</p> <p>Local law and/or ETI requirement: Not applicable</p> <p>Recommended corrective action: Not applicable</p>	<p>Objective evidence observed:</p> <p>Not applicable</p>
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Observation:	
Description of observation: None Observed Local law or ETI requirement: Not applicable Comments: Not applicable	Objective evidence observed: Not applicable

Good Examples observed:	
Description of Good Example (GE): None Observed	Objective Evidence Observed: Not applicable

10. Other Issue areas: 10A: Entitlement to Work and Immigration

[\(Click here to return to NC-table\)](#)

Additional Elements

10A.1 Only workers with a legal right to work shall be employed or used by the supplier.
 10A.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 is no migrant employee at the facility.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

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

Any other comments: None

Non-compliance:

1. Description of non-compliance:

- NC against ETI/Additional Elements NC against Local Law
 NC against customer code:

None Observed

Local law and/or ETI /Additional Elements requirement: Not applicable

Recommended corrective action: Not applicable

Objective evidence observed:

Not applicable

Observation:

Description of observation: None Observed

Local law or ETI/Additional Elements requirement: Not applicable

Comments: Not applicable

Objective evidence observed:

Not applicable

Good examples observed:

Description of Good Example (GE): None Observed

Objective Evidence Observed:

Not applicable

10. Other issue areas 10B4: Environment 4–Pillar

[\(Click here to return to summary of findings\)](#)

To be completed for a 4–Pillar SMETA Audit and remove the previous page which is 10B2 environment 2 pillar

B.4. Compliance Requirements

10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.

10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.

10B4.3 Businesses shall be aware of their end client’s environmental standards/code requirements

10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.

10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.

10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4–pillar audit report and audit checks for details).

10B4.7 Businesses shall make continuous improvements in their environmental performance.

10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation

10B4.9 Businesses should have a nominated individual responsible for co–ordinating the site's efforts to improve environmental performance.

B4. Guidance for Observations

10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.

10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.

Note for auditors and readers. This environment section is intended to take not more than 0.25 auditor days. It is an assessment only and the main requirement is to establish whether a site is meeting applicable environmental laws and/or has any certifications or environmental management systems in place. Following this assessment, the client/supplier may decide a full environmental audit is required (see also best practice guidance/environment and guidance for auditor)

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 is aware of clients' and environmental requirements.
 The facility uses OSB (Organized industrial Zone)'s waste water treatment system.
 The hazardous wastes are sent to authorized and licenced firms.
 Environmental permit of the facility is available.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:
 Facility tour
 Environmental documents review

Waste reports Employee interview Any other comments: None	
Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local <input type="checkbox"/> NC against customer code: None Observed Local law and/or ETI/Additional Elements requirement: Not applicable Recommended corrective action: Not applicable	Objective evidence observed: Not applicable

Observation:	
Description of observation: None Observed Local law or ETI/Additional elements requirements: Not applicable Comments: Not applicable	Objective evidence observed: Not applicable

Good examples observed:	
Description of Good Example (GE): GE#8 The facility has solar panels that produce electricity.	Objective Evidence Observed: Document review

Environmental Analysis <i>(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)</i>	
A: Is there a manager responsible for Environmental issues (Name and Position):	HATUN BATLICANCI –QUALITY AND SOCIAL COMPLIANCE RESPONSIBLE
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks was prepared by the occupational health and safety expert and environmental consultant.
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: ISO 14001:2015 Valid till 28 Jun 2023
D: Does the site have an Environmental policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, is it publicly available? The facility has detailed environmental policy.
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Environmental policy addresses the key impacts from their operations and their commitment to improvement.
F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please give details. <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: There was no sustainability systems in the facility.
H: Have all legally required permits been shown? Please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: There is environmental permit for air emission and wastewater discharge.
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A I1: Please give details: Hazardous chemicals is recorded and its wastes are sent to licenced firms. MSDS documents available for chemicals.
J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Client's requirements and legislation regarding environmental and chemical issues are followed and monitored.
K: Facility has reduction targets in place for environmental aspects e.g. water consumption	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

<p>and discharge, waste, energy and green-house gas emissions:</p>	<p>K1: Please give details: The facility demands social compliance audits including chemicals and environmental</p>
<p>L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: Some wastes (non-hazardous) are sent to recycling firms.</p>
<p>M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: Environmental issues are monitored by HATUN BATLICANCI –QUALITY AND SOCIAL COMPLIANCE RESPONSIBLE</p>
<p>N: Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: The facility demands social compliance audits including chemicals and environmental issues from its important suppliers for managing clients' requirements.</p>

Usage/Discharge analysis		
Criteria	Previous year: Please state period: 2022	Current Year: Please state period: 2023
Electricity Usage: <i>Kw/hrs</i>	Not Provided	Not Provided
Renewable Energy Usage: <i>Kw/hrs</i>	Not Provided	Not Provided
Gas Usage: <i>Kw/hrs</i>	Not Provided	Not Provided
Has site completed any carbon Footprint Analysis?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If Yes , please state result	N/A	N/A
Water Sources: <i>Please list all sources e.g. lake, river, and local water authority.</i>	well water, purification water	well water, purification water
Water Volume Used: <i>(m³)</i>	140	140
Water Discharged: <i>Please list all receiving waters/recipients.</i>	0	0
Water Volume Discharged: <i>(m³)</i>	0	0
Water Volume Recycled: <i>(m³)</i>	0	0
Total waste Produced <i>(please state units)</i>	%1	%1
Total hazardous waste Produced: <i>(please state units)</i>	%1	%1
Waste to Recycling: <i>(please state units)</i>	% 30 (Wastes are sent to recycling firms)	% 30 (Wastes are sent to recycling firms)
Waste to Landfill: <i>(please state units)</i>	%1	%1
Waste to other: <i>(please give details and state units)</i>	None	None
Total Product Produced <i>(please state units)</i>	9000000 m3	10000000 m3

10C: Business Ethics – 4-Pillar Audit

[\(Click here to return to summary of findings\)](#)

To be completed for a 4-Pillar SMETA Audit

10C. Compliance Requirements

10C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.

10C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.

10C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.

10C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.

10C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,

10C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics

10C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.

10C. Guidance for Observations

10C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.

10C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented

Note for auditors and readers. This Business Ethics section is intended to take not more than 0.25 auditor days. It is an assessment not an audit.

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 is aware of client's business code requirements for business practices.

The facility has a written business ethics policy.

Anti-corruption and bribery policy are available.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

Facility policy

Management interview

Employee interview

Any other comments: None

Non-compliance:	
<p>1. Description of non-compliance:</p> <p><input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local</p> <p><input type="checkbox"/> NC against customer code:</p> <p>None Observed</p> <p>Local law and/or ETI/Additional Elements requirement: Not applicable</p> <p>Recommended corrective action: Not applicable</p>	<p>Objective evidence observed:</p> <p>Not applicable</p>

Observation	
<p>Description of observation: None Observed</p> <p>Local law or ETI/Additional elements requirement: Not applicable</p> <p>Comments: Not applicable</p>	<p>Objective evidence observed:</p> <p>Not applicable</p>

Good examples observed:	
<p>Description of Good Example (GE): None Observed</p>	<p>Objective Evidence Observed:</p> <p>Not applicable</p>

<p>A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?</p>	<p><input checked="" type="checkbox"/> Internal Policy</p> <p><input checked="" type="checkbox"/> Policy for third parties including suppliers</p> <p>A1: Please give details: The facility has a business ethics policy and the policy was communicated internally and externally via meetings and e-mails.</p>
<p>B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>B1: Please give details: Employees are informed on business ethics issues.</p>
<p>C: Is the policy updated on a regular (as needed) basis?</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>C1: Please give details: The management stated that the policy was updated on a regular (as needed) basis.</p>
<p>D: Does the site require third parties including suppliers to complete their own business ethics training</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>D1: Please give details: Business ethics policy are sent to the suppliers and it was signed to confirm by the suppliers.</p>

Other findings

Other Findings Outside the Scope of the Code

None Observed.

Community Benefits

(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)










None Observed.

Appendix 1

Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."

Not Applicable please x

Photo Form

		
<p>Outview Of the Facility</p>	<p>Outview Of the Facility</p>	<p>Fire Alarm Button</p>
		
<p>Fire Hose</p>	<p>PPE</p>	<p>Fire Extinguisher</p>
		
<p>Emergency Exit</p>	<p>Electricity Panel</p>	<p>Smoke Detector</p>



<p>Compressor</p>	<p>Lunch Hall</p>	<p>Production Area 1</p>
<p>Announcement Board</p>	<p>Production Area 2</p>	<p>Production Area 3</p>
<p>Evacuation Plan</p>	<p>Chemical Storage</p>	



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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:](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

[http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

[Click here for Supplier \(B\) members:](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)

[http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)

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