SMETA

Sedex Members Ethical Trade Audit Report

Version 6.1

Audit Details			
Sedex Company Reference: *(only available on Sedex System)*	ZC: 404874152	Sedex Site Reference: *(only available on Sedex System)*	ZS: 419701171
Business name (Company name):	NARKONTEKS TEKSTIL IHRACAT ITHALAT SANAYI VE TICARET A.S.		
Site name:	NARKONTEKS TEKSTIL IHRACAT ITHALAT SANAYI VE TICARET A.S.		
Site address: *(Please include full address)*	INONU MAHALLESI MURADIYE SANAYI BOLGESI 28. SOKAK DIS KAPI NO: 24 MANISA	Country:	TURKIYE
Site contact and job title:	HALIME UYSAL - INSAN KAYNAKLARI/ HUMAN RESOURCES		
Site phone:	0533 408 54 35	Site e–mail:	manisaik@narkonteks.com

SMETA Audit Pillars:	☒ Labour Standards	☒ Health & Safety (plus Environment 2-Pillar)	☐ Environment 4-pillar	☐ Business Ethics
Date of Audit:	01.08.2022			

Audit Company Name & Logo:	**Report Owner (payer):**
INTERTEK TEST HIZMETLERI A.S	**NARKONTEKS TEKSTIL IHRACAT ITHALAT SANAYI VE TICARET A.S.**

Audit Conducted By					
Affiliate Audit Company	☒	Purchaser	☐	Retailer	☐
Brand owner	☐	NGO	☐	Trade Union	☐
Multi–stakeholder	☐	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): The group interview was not done due to Covid-19, 6 individual interviews were made.

Lead auditor: CANSU BAYSAK – LEAD AUDITOR APSCA number: RA 21704078
Lead auditor APSCA status: RA
Team auditor: EMINE ELIF DEMIRHAN – TEAM AUDITOR APSCA number: ASCA 32200077
Interviewers: CANSU BAYSAK & EMINE ELIF DEMIRHAN
APSCA number: RA 21704078 & ASCA 32200077

Report writer: EMINE ELIF DEMIRHAN, Team Auditor
Report reviewer: GANGADHARAIAH M. K, Audit Report Reviewer

Date of declaration: 01.08.2022

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 *(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.***		**Area of Non–Conformity** *(Only check box when there is a non–conformity, and only in the box/es where the non–conformity can be found)*				**Record the number of issues by line*:**			**Findings** ***(note to auditor, summarise in as few words as possible NCs, Obs and GE)***
		ETI Base Code	**Local Law**	**Additional Elements**	**Customer Code**	**NC**	**Obs**	**GE**	
0A	Universal Rights covering UNGP			☐	☐		1	0	OBS 1) No outside grievance mechanism.
0B	Management systems and code implementation		☐	☐	☐	0	1	0	OBS 1) ETI Base code was not announced to the suppliers and subcontractors.
1.	Freely chosen Employment	☐	☐		☐	0	0	0	None observed
2	Freedom of Association	☐	☐		☐	0	0	0	None observed
3	Safety and Hygienic Conditions	☒	☒		☐	3	0	0	NC 1) No rechargeable lamps for some emergency exits. 2) No secondary containers for chemicals in some areas. 3) Inadequate regular medical examinations.
4	Child Labour	☒	☒		☐	1	0	0	NC 4) Childcare facilities are not provided, and it is a legal requirement.
5	Living Wages and Benefits	☐	☐		☐	0	0	2	GE 1) Meal and transportation are provided free.

									2) Gift voucher.
6	Working Hours	☐	☐		☐	0			None observed
7	Discrimination	☐	☐		☐	0	0	0	None observed
8	Regular Employment	☐	☐	☐	☐	0	0	0	None observed
8A	Sub–Contracting and Homeworking		☐	☐	☐	0	0	0	None observed
9	Harsh or Inhumane Treatment	☐	☐	☐	☐	0	0	0	None observed
10A	Entitlement to Work		☐	☐	☐	0	0	0	None observed
10B2	Environment 2-Pillar		☐	☐	☐	0	0	0	None observed
10B4	Environment 4–Pillar		☐	☐	☐	N/A	N/A	N/A	Not Applicable
10C	Business Ethics		☐	☐	☐	N/A	N/A	N/A	Not Applicable

General observations and summary of the site:

NARKONTEKS TEKSTIL was established in 2005 in İzmir. Manisa branch was established in 2014 in the current location as NARBAY TEKSTIL and merged with NARKONTEKS TEKSTIL in October 2021.
Total area is approximately 7000 square meters, total closed area is approximately 3000 meters. Building structure is concrete.

Main product: Woven, men and children underwear.
Main processes: Sewing, heat transfer pressing, pad printing, quality control, ironing and packaging.
*Cutting process is performed at company's İzmir location.
Monthly capacity is 200.000 pieces.

There is total 223 workers on site.
Administration: 11 employees (10 females, 1 male)
Production: 205 employees (201 females, 4 males)

Indoor Contractors:
EUROSERVE
Cleaning: 2 (1 female, 1 male)
Security: 3 males

EUREST SOFRA
Kitchen: 2 females

# of juvenile workers (15-18): 0 (The youngest worker on site was 18 years old.)
# of pregnant workers: 3
# of disabled workers: 6
maternity leave: 1
unpaid maternity leave: 5
breast-feeding leave: 1
migrant workers: 0
#of ISKUR workers: 18

There were 3 worker representatives at the facility and 1 was included in the employee interviews.

Working hours are arranged as, From Monday to Friday:
07:30 to 17:30 including 15'x2 tea breaks and 60' lunch break x 5 days

Working hours for pregnant workers are arranged as, From Monday to Friday:
07:30 to 17:30 including 30'x2 tea breaks and 90' lunch break x 5 days

Working hours for breast-feeding worker are arranged as, From Monday to Friday:
07:30 to 16:00 including 15'x2 tea breaks and 60' lunch break x 5 days

Payments are on 7th of each month by bank.

At least legal minimum wage was paid to all workers.
Since January 1st,2021: 3.577,50 TL/month (Gross),2.557,59 TL (Net), 2.825,90 TL (Net including minimum subsistence allowance) /month)
Since January 1st, 2022: 5.004,00 TL/month (Gross), 4.253,40 TL/month (Net)

Time and wage records are submitted for last 12 months (from July 2021 to June 2022)

26 employees were selected for record review and according to SMETA Covid-19 recommendation, 6 workers were interviewed individually.
26 employees' records were reviewed for June 2022 (last paid and peak month), January 2022 (non-peak month) and October 2021 (random month).

Audit Process
At 10:00 am on 01.08.2022 CANSU BAYSAK/LEAD AUDITOR and EMINE ELIF DEMIRHAN/TEAM AUDITOR entered the facility then held an opening meeting according to the ETI Base Code and local laws. Opening meeting was held with HALIME UYSAL – HUMAN RESOURCES RESPONSIBLE, closing meeting was held with HALIME UYSAL – HUMAN RESOURCES RESPONSIBLE and ASLIHAN MELISA IPEKSAC – CSR EXPERT.

There were several non-compliances found in the audit as per the table.

**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

<table>
<tr><th colspan="3">Site Details</th></tr>
<tr><td>A: Company Name:</td><td colspan="2">NARKONTEKS TEKSTIL IHRACAT ITHALAT SANAYI VE TICARET A.S.</td></tr>
<tr><td>B: Site name:</td><td colspan="2">NARKONTEKS TEKSTIL IHRACAT ITHALAT SANAYI VE TICARET A.S.</td></tr>
<tr><td>C: GPS location:
(If available)</td><td>GPS Address: INONU MAHALLESI MURADIYE SANAYI BOLGESI 28. SOKAK DIS KAPI NO: 24 MANISA TURKIYE</td><td>Latitude: 38°38'03.7"N
Longitude: 27°21'13.2"E</td></tr>
<tr><td>D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections</td><td colspan="2">Workplace Opening Operating Permit Nb and Date
GSM-2022/06 – 11.05.2022
This is a permanent permit</td></tr>
<tr><td>E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc</td><td colspan="2">Main product: Woven, men and children underwear.
Main processes: Sewing, heat transfer pressing, pad printing, quality control, ironing and packaging.
*Cutting process is performed at company's İzmir location.</td></tr>
<tr><td>F: Site description:
(Include size, location, and age of site. Also, include structure and number of buildings)</td><td colspan="2">NARKONTEKS TEKSTIL was established in 2005 in İzmir. Manisa branch was established in 2014 in the current location as NARBAY TEKSTIL and merged with NARKONTEKS TEKSTIL in October 2021.
Total area is approximately 7000 square meters, total closed area is approximately 3000 meters. Building structure is concrete.
Monthly capacity is 200.000 pieces.

<table>
<tr><td>Production Building no 1</td><td>Description</td><td>Remark, if any</td></tr>
<tr><td>Floor 1</td><td>Sewing, Ironing-Packaging, Lunch Hall, Medical Room, Lockers, Toilets</td><td>None</td></tr>
<tr><td>Mezzanine Floor</td><td>Offices, Toilets</td><td>None</td></tr>
<tr><td>Is this a shared building?</td><td>No</td><td>None</td></tr>
</table>

For below, please add any extra rows if appropriate.

F1: Visible structural integrity issues (large cracks) observed?
☐ Yes
☒ No
F2: Please give details: No crack was observed.

F3: Does the site have a structural engineer evaluation?</td></tr>
</table>

	☒ Yes ☐ No F4: Please give details: The company had building structure construction permits that ensure the buildings had the aseismic design in terms of architectural science.
G: Site function:	☐ Agent ☒ Factory Processing/Manufacturer ☐ Finished Product Supplier ☐ Grower ☐ Homeworker ☐ Labour Provider ☐ Pack House ☐ Primary Producer ☐ Service Provider ☐ Sub–Contractor
H: Month(s) of peak season: (if applicable)	June, July, August
I: Process overview: *(Include products being produced, main operations, number of production lines, main equipment used)*	Main product: Woven, men and children underwear. Main processes: Sewing, heat transfer pressing, pad printing, quality control, ironing and packaging. *Cutting process is performed at company's İzmir location. 28 stopstitch machines, 108 sewing machines, 71 interlock machines, 1 heat transfer press, 2 pad printing machines, 14 irons.
J: What form of worker representation / union is there on site?	☐ Union (name) ☐ Worker Committee ☒ Other (Open door policy, worker representatives and suggestion boxes) ☐ None
K: Is there any night production work at the site?	☐ Yes ☒ No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	☐ Yes ☒ No L1: If yes, approx. % of workers in on site accommodation N/A
M: Are there any off site provided worker accommodation buildings	☐ Yes ☒ No M1: If yes, approx. % of workers N/A
N: Were all site-provided accommodation buildings included in this audit	☐ Yes ☐ No N1: If no, please give details N/A

Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 10:00 A2: Day 1 Time out: 18:00	A3: Day 2 Time in: N/A A4: Day 2 Time out: N/A	A5: Day 3 Time in: N/A A6: Day 3 Time out: N/A
B: Number of auditor days used:	2 AUDITORS X 1 DAY (2 AUDIT DAY)		
C: Audit type:	☒ Full Initial ☐ Periodic ☐ Full Follow–up ☐ Partial Follow–Up ☐ Partial Other If other, please define:		
D: Was the audit announced?	☐ Announced ☒ Semi – announced: Window detail: 2 weeks (01.08.2022-12.08.2022) ☐ Unannounced		
E: Was the Sedex SAQ available for review?	☒ Yes ☐ No If No, why not		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	☐ Yes ☒ No If **Yes**, please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR *(Name and job title)*	HALIME UYSAL - HUMAN RESOURCES		
H: Is further information available *(If yes, please contact audit company for details)*	☐ Yes ☒ No		
I: Previous audit date:	NA		
J: Previous audit type:	NA		
K: Were any previous audits reviewed for this audit	☐ Yes ☐ No ☒ N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	☒ Yes ☐ No	☐ Yes ☒ No	☐ Yes ☒ No

B: Present at the audit?	☒ Yes ☐ No	☐ Yes ☒ No	☐ Yes ☒ No
C: Present at the closing meeting?	☒ Yes ☐ No	☐ Yes ☒ No	☐ Yes ☒ No
D: If Worker Representatives were not present please explain reasons why *(only complete if no worker reps present)*	There is no worker committee. There are 3 worker representatives at the facility. 1 of them was included the audit scope.		
E: If Union Representatives were not present please explain reasons why: *(only complete if no union reps present)*	There is 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*				Total
	Permanent	Temporary (ISKUR)	Agency (Contractors)	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	5	0	4	0	0	0	0	9
Worker numbers – female	193	18	3	0	0	0	0	214
Total	198	18	7	0	0	0	0	223
Number of Workers interviewed – male	0	0	2	0	0	0	0	2
Number of Workers interviewed – female	3	1	0	0	0	0	0	4
Total – interviewed sample size	3	1	2	0	0	0	0	6

*this table only excludes the management

A: Nationality of Management	Turkish	
B: Please list the nationalities of all workers, with the three most common nationalities listed first. *Please add more nationalities as applicable to site. Add more rows if required.*	Nationalities: B1: Nationality 1: Turkish_____ B2: Nationality 2: _____ B3: Nationality 3: _____	Was the list completed during peak season? ☒ Yes ☐ No If no, please describe how this may vary during peak periods: N/A
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1 _100%___ C1: approx % total workforce: Nationality 2 _____ C2: approx % total workforce: Nationality 3 _____	
D: Worker remuneration *(management information)*	D: _____% workers on piece rate D1: 100___% hourly paid workers D2: _____% salaried workers Payment cycle: D3: _____% daily paid D4: _____% weekly paid D5: 100 ___% monthly paid D6: _____% other D7: If other, please give details	

Worker Interview Summary

Worker Interview Summary		
A: Were workers aware of the audit?	☒ Yes ☐ No	
B: Were workers aware of the code?	☒ Yes ☐ No	
C: Number of group interviews: *(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)*	None (as per SMETA recommendation for Covid-19)	
D: Number of individual interviews *(Please see SMETA Best Practice Guidance and Measurement Criteria)*	D1: Male: 2	D2: Female: 4
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. *Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment*	☒ Yes ☐ No If no, please give details	
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	☒ Yes ☐ No	
G: In general, what was the attitude of the workers towards their workplace?	☒ Favourable ☐ Non–favourable ☐ Indifferent	
H: What was the most common worker complaint?	None	
I: What did the workers like the most about working at this site?	Payment on time	
J: Any additional comment(s) regarding interviews:	None	
K: Attitude of workers to hours worked:	Favourable	
L. Is there any worker survey information available?		
☒ Yes ☐ No L1: If yes, please give details: Worker survey conducted on 29.07.2022		
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 the employees was positive. Social insurance and payment on time were the positive issues raised by the employees. There is no discrimination, harassment, abuse or forced labour.
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 comment was 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 cooperative during the audit process.

Audit Results by Clause

0A: Universal Rights covering UNGP

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:
Documented social compliance policy and procedures are established.
The responsible person from the management system is ASLIHAN MELISA IPEKSAC – CSR EXPERT.
The facility doesn't have grievance mechanism for all partners. Please refer to OBS1.

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
- Management interview
- Employee interviews

Any other comments: None

A: Policy statement that expresses commitment to respect human rights?	☒ Yes ☐ No A1: Please give details: The facility has detailed social compliance policy that includes human rights.
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	☒ Yes ☐ No Please give details: Name: ASLIHAN MELISA IPEKSAC Job title: CSR EXPERT
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?	☒ Yes ☐ No C1: Please give details: The facility has suggestion boxes.
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)	☒ Yes ☐ No D1: If no, please give details N/A
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	☒ Yes ☐ No E1: Please give details: The facility has detailed privacy procedures for worker's information. Also, the feedbacks getting from suggestion box are evaluating by the management in a confidential way.

Findings	
1. Finding: Observation ☒ **Company NC** ☐ **Description of observation:** There was no external mechanism at the facility. **Local law or ETI/Additional elements / customer specific requirement:** **ETI/Additional elements:** 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. **Comments:** Please fulfil related requirements.	**Objective evidence observed:** 1-Document Review, Management Interview

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

Measuring Workplace Impact

Measuring Workplace Impact Table

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: 2021 2.4 %	A2: This year: 2022 1.95 %
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 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	1.78 %	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 2021 10 %	C2: This year: 2022 10 %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	10 %	
E: Are accidents recorded?	☒ Yes ☐ No E1: Please describe: Records are kept properly.	
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: 2021 0.77	F2: This year: 2022 0.81
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]	0.84	
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: 2021 4.73	H2: This year: 2022 2.22
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months __N/A_____% workers	I2: 12 months __ N/A _____% workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months __ N/A _____% workers	J2: 12 months ___ N/A _____% workers

0: Management systems and Code Implementation

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: Documented disciplinary procedures and work rules are established. All social compliance issues are managed and monitored internally. The employees have information regarding social compliance, social and legal rights. The facility management has already posted ETI Base code on notice board. Overall responsibility for meeting the standards is taken by ASLIHAN MELISA IPEKSAC – CSR EXPERT **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:	
A: In the last 12 months, has the site been subject to any fines/prosecutions for non–compliance to any regulations?	☐ Yes ☒ No A1: Please give details: N/A
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	☒ Yes ☐ No B1: Please give details: Policies and procedures about reduce the risk of forced labour, child labour, discrimination and harassment &abuse are available.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Policies exist for all areas (Forced labour, Health and Safety, Wages, Working Hours, and No harsh treatment, Environment, Business Ethics, Child Labour, Recruitment, Discrimination), these are

	communicated to workers via poster and training. Through documents review and workers interview, policy on 'No harsh treatment and Environment' was fully in compliance with the code. Workers stated no forced labour, no child labour was found (through interview and document checks).
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	☒ Yes ☐ No D1: Please give details: These policy and procedures are communicated to all the staff through poster and communicated as a part of orientation training
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	☒ Yes ☐ No E1: Please give details: Training records are available.
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).*	☒ Yes ☐ No F1: Please give details: ISO 9001:2015 (Certificate No KY-28004, Registration date 24.03.2022) ISO 14001:2015 (Certificate No CY-33639, Registration date 24.03.2022) ISO 45001:2018 (Certificate No OH-53200, Registration date 24.03.2022) ISO 50001:2018 (Certificate No EE.2022.2305, Registration date 15.02.2022) ISO 27001:2013 (Certificate No IQM-I-0667, Certificate Issue Date: 14.02.2022)
G: Is there a Human Resources manager/department? If Yes, please detail.	☒ Yes ☐ No G1: Please give details: YELIZ URGAN – HR RESPONSIBLE
H: Is there a senior person / manager responsible for implementation of the code	☒ Yes ☐ No H1: Please give details: ASLIHAN MELISA IPEKSAC – CSR EXPERT
I: Is there a policy to ensure all worker information is confidential?	☒ Yes ☐ No I1: Please give details: All worker information is kept on their personnel files. These files are kept on HR room.
J: Is there an effective procedure to ensure confidential information is kept confidential?	☒ Yes ☐ No

	J1: Please give details: All worker information is kept on their personnel files. These files are kept on HR room.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	☒ Yes ☐ 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?	☒ Yes ☐ No L1Please give details: The facility performs a corrective action plan for the findings that addressed on risk assessment.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	☒ Yes ☐ No M1: Please give details: The facility has choosing and evaluating procedure for its suppliers.
Land rights	
N: Does the site have all required land rights licenses and permissions *(see SMETA Measurement Criteria)*?	☒ Yes ☐ No N1: Please give details: There is opening and operating permit and building and occupancy permit of the facility
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?	☒ Yes ☐ No O1: Please give details: There is opening and operating permit and building and occupancy permit of the facility
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	☒ Yes ☐ No P1: If yes, how does the company obtain FPIC: The facility main production process 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.	☒ Yes ☐ No Q1: Please give details: The facility has rental agreement in accordance with the law.
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	☒ Yes ☐ No R1: Please give details: There is no land acquisition. 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.	☐ Yes ☒ No S1: Please give details: N/A

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 requirement** Not Applicable **Recommended corrective action:** Not Applicable	**Objective evidence observed:** Not Applicable

Observation:	
2.Description of observation: ETI Base code was not announced to the suppliers and subcontractors. **Local law or ETI requirement:** 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. **Comments:** Please ensure that ETI Base Code was announced to suppliers and subcontractors.	**Objective evidence observed:** 2- Document Review, Management interview

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

1: Employment is Freely Chosen

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. 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

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

	N/A
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?	☐ Yes ☐ No ☒ 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?	☐ Yes ☒ No F1: Please describe finding:
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	☐ Yes ☐ No ☒ Not applicable G1: If yes, please give details and category of workers affected: Auditor Note: The facility has a detailed procedure regarding this issue.
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	☒ Yes ☐ No H1: Please describe finding: The facility has a detailed procedure regarding this issue includes reducing the risk of forced/trafficked labour

Non–compliance:	
1. Description of non–compliance: ☐ NC against ETI code: ☐ NC against Local Law: ☐ NC against customer 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

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

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

(Click here to return to summary of findings)
(Click here to return to Key Information)

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:
They have open door policy and suggestion box.
Union membership is not prohibited.
There were 3 worker representatives in the facility.

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

- Management interview
- Worker interview
- Worker representative interview
- Suggestion boxes records
- Policy of the facility regarding freedom of association.

Any other comments: None

A: What form of worker representation/union is there on site?	☐ Union (name) ☐ Worker Committee ☒ Other (Open-door policy, worker representatives, suggestion boxes) ☐ None
B: Is it a legal requirement to have a union?	☐ Yes ☒ No

C: Is it a legal requirement to have a worker's committee?	☐ Yes ☒ No	
D: Is there any other form of effective worker/management communication channel? *(Other than union/worker committee e.g. H&S, sexual harassment)*	☒ Yes ☐ No Describe: Employees declared that they could go directly to the management for their suggestions whenever they want. In addition to this, suggestion box is placed. Is there evidence of free elections? ☒ Yes (for worker representatives) ☐ No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	☐ Yes ☐ No E1: Please give details: N/A-there is no union at the facility.	
F: Name of union and union representative, if applicable:	There is no union at the facility.	F1: Is there evidence of free elections? ☐ Yes ☐ No ☒ N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	There are 3 worker representatives, open door policy and suggestion boxes in the facility.	G1: Is there evidence of free elections? ☒ Yes ☐ No ☐ N/A
H: Are all workers aware of who their representatives are?	☒ Yes ☐ No	
I: Were worker representatives freely elected?	☒ Yes ☐ No	I1: Date of last election: 16.05.2019
J: Do workers know what topics can be raised with their representatives?	☒ Yes ☐ No	
K: Were worker representatives/union representatives interviewed?	☒ Yes ☐ No If **Yes**, please state how many: 1	
L: Please describe any evidence that union/worker's committee is effective? *Specify date of last meeting; topics covered; how minutes were communicated etc.*	NA – There is no union or committee at the facility.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	☐ Yes ☒ No	
If **Yes,** what percentage by trade Union/worker representation	M1: _N/A___% workers covered by Union CBA	M2: _N/A___% workers covered by worker rep CBA

M3: If **Yes**, does the Collective Bargaining Agreement (CBA) include rates of pay?	☐ Yes ☐ No N/A

Non–compliance:	
1. Description of non–compliance: ☐ NC against ETI code**:** ☐ NC against Local Law ☐ NC against customer 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

3: Working Conditions are Safe and Hygienic

(Click here to return to summary of findings)
(Click here to return to Key Information)

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:

1. Covid-19 measurements
- Detailed procedures are available for managing Covid-19 period.
- Additional hand disinfectants are provided especially for social areas.
- Risk assessment and emergency action plans are provided for COVID19 issues.
- Posters and warnings on Covid-19 is provided to facility.
- Covid -19 training is provided to all employees.

2. General Health and Safety management
- Risk assessment is available.
- Emergency case plans were provided inside the facility.
- Emergency evacuation plans were provided in the facility
- Injury records were kept with root cause analysis

3. Fire Safety
- There were at least 2 exits from work area and these were clearly marked.
- Firefighting equipment was adequate and checks were up-to-date.
- Fire drills were performed with participation of all workers including other tenant agency every year.

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

4. Chemical safety
- Machine oil is the main chemical – not used by workers directly.

5. Medical services
- There were adequate first aid kits and they were well stocked.
- There was contracted jobsite doctor and first aid certified staff.

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
- Training records and certificates
- Fire equipment maintenance records
- Fire drill records
- Government licenses and checks on dust, thermal comfort, illumination and noise level
- Potable water testing certificates

Any other comments: None

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	☒ Yes ☐ No A1: Please give details: The facility has health & safety procedures, and these procedures are shared with employees via trainings.
B: Are the policies included in workers' manuals?	☒ Yes ☐ 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.
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	☐ Yes ☒ No C1: Please give details: N/A
D: Are visitors to the site informed on H&S and provided with personal protective equipment	☒ Yes ☐ No D1: Please give details: Visitors were informed by OHS specialist.
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.	☒ Yes ☐ No E1: Please give details: Doctor room was available and meet legal requirements
F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	☒ Yes ☐ No F1: Please give details: Contracted doctor and first aid certified staff was available.
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?	☒ Yes ☐ No G1: Please give details: Driver licenses, maintenance reports were available.
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	☐ Yes ☐ No N/A 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?	☒ Yes ☐ No I1: Please give details: Risk assessment was conducted covering analysis of working hours.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	☒ Yes ☐ No J1: Please give details: The site is meeting its legal obligations on environmental requirements.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	☐ Yes ☐ No N/A K1: Please give details: No banned chemical is used by the facility.

Non–compliance:

1. Description of non–compliance:

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

There are no rechargeable lamps on the for warehouse and production area doors.

Local law and/or ETI requirement:
Local law: In accordance with the Regulation on Protection of Buildings Against Fire (19.12.2007), Art 71 (1) All emergency exit routes and stairs should be illuminated.
Art 72 (1) Emergency lighting system should be automatically functional in case of electricity cut off by city electricity network or similar outside electricity supply and electricity cut off for safety reasons such as fire and earthquake.

The Regulation on the Health and Safety Measures Taken for the Buildings and Additions (17.07.2013, No: 28710)
Appendix-1
Minimum Health and Safety Requirements for Buildings and Additions
Emergency Exit Routes and Doors

10- f) There shall be found emergency lightning system which connected to a separate energy source for providing sufficient illumination in case of power cut on emergency exit routes and doors which has to be illuminated.

ETI requirement: 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.

Recommended corrective action:

Objective evidence observed:
1-Site Tour
Please see NC Photo1

It is recommended to ensure that all emergency exits are marked, have battery-operated light and are opening outwards. **2. Description of non–compliance:** ☒ NC against ETI ☒ NC against Local Law ☐ NC against customer code**:** Secondary containers were not provided for chemicals in chemical warehouse and maintenance areas. **Local law and/or ETI requirement:** **Local law:** In accordance with the Turkish Regulation on the Health and Safety Precautions Taken While Working with the Chemical Substances (12.08.2013) No: 28733 Art. 8 - (1) Employer shall take into consideration following issues in accordance with Regulation on Emergency Cases dated 18.06.2013 and No. 26861 for emergency cases which will be caused by chemical substances. a) Preventive precautions against negative impacts of emergency cases are taken immediately and employees are informed. Necessary actions are taken to return the emergency cases to normal within the shortest time. **ETI requirement:** 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. **Recommended corrective action:** Please provide secondary containers for all chemicals. **3. Description of non–compliance:** ☒ NC against ETI/Additional Elements ☒ NC against Local Law ☐ NC against customer code**:** It has been noted that 50% of the enterprises have current health screening. **Local law and/or ETI requirement:** **Local law:** OCCUPATIONAL HEALTH AND SAFETY LAW#6331(20/6/2012) ARTICLE 15 – (1) The employer does the following: a) Ensures that the employees are subjected to health surveillance, by taking into account the health and safety risks that they would encounter at the workplace. b) In the following cases, they must ascertain that the employees' medical check-ups are done: 1) When they start the job. 2) When they change their job. 3) When after repeated leaves because of an industrial accident, occupational disease or health issued, they request to return to the job. 4) Throughout the employment, at regular interval as decided by the Ministry according to the qualifications of the employee, the nature of the work and the danger class of the workplace.	2-Site Tour Please see NC Photo2 3- Document Review, Management and Employee Interview

(2) Those who will work at hazardous and very hazardous class workplaces will not be allowed to start work until they get a health report verifying that are medically fit for the job. (3) Medical reports that must be obtained as a requirement under this Law must be obtained at the workplace health and safety unit or from the workplace doctor that works at the joint health and safety unit from which service is procured. Objections to the reports must be submitted to the arbitrator hospitals that are selected by the Ministry of Health, and their decisions will be final. (4) All costs of the health surveillance and all additional cost that is incurred because of such surveillance will be borne by the employer, and the employee will not be charged for them. (5) Medical details of the employee who has been examined will be kept confidential respecting the right of privacy. **ETI requirement:** ETI 3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers. **Recommended corrective action:** Please make health screenings of all employees.	

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

4: Child Labour Shall Not Be Used

4: Child Labour Shall Not Be Used *(Click here to return to summary of findings)* *(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: Youngest worker in the facility was18. No historical child labour was noted during the documents review. Employees' personnel files include recent photo and the age documentation, which is in the form of photocopied ID card. The card lists the employee's name, household address and the date of birth. **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?	☐ Yes ☒ 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)	☐ Yes ☒ No E1: If yes, give details N/A

Non–compliance:	
4. Description of non–compliance: ☒ NC against ETI code: ☒ NC against Local Law ☐ NC against customer There are 214 permanent female employees in the facility, however there is no creche in the facility. they plan to complete the procedures after the pandemic and open the creche to service. **Local law and/or ETI requirement:** **Local law:** Regulation on Working Conditions of Pregnant or Breastfeeding Females, Breastfeeding Rooms and Childcare Facilities, No.28737, Date: 16.08.2013; Art. 13 – (2) In any case of ages and marital status, employers who employ more than 150 females shall establish a childcare facility which fulfil the conditions stated in Appendix-IV for female employees to leave their children (0-6 ages), childcare and breastfeeding. If the childcare facility is more than 250 m. far away from the company, employer shall provide transportation. **ETI requirement:** ETI 4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards. **Recommended corrective action:** Please provide creche.	**Objective evidence observed:** 4- Document Review, Management and Employee Interview

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

5: Living Wages are paid

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:
There was no employee under the legal minimum wage.
Payslip is given to the employees.
Payments are done on 7th of each month via bank accounts.

Legal monthly minimum wage:
Since January 1st, 2021: 3.577,50 TL(Gross); 2,557.59 TL (Net)
Since January 1st, 2022: 5004 TL (Gross) and 4253,40 TL (Net)

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):
Details:
Time and wage records are submitted for last 12 months (from July 2021 to June 2022)
26 employees' records were reviewed for June 2022 (last paid and peak month), January 2022 (non-peak month) and October 2021 (random month).

- Social insurance records
- Employee & management interviews
- Labour contracts

Any other comments: None

Non–compliance:

1. Description of non–compliance:	**Objective evidence observed:** *(where relevant please add photo numbers)*
☐ NC against ETI code: ☐ NC against Local Law ☐ NC against customer None observed **Local law and/or ETI requirement:** Not Applicable	Not Applicable

Recommended corrective action: 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): 1) Meal and transportation are provided free of charge to all employees. 2) A gift voucher of 1000 TL is given once during the holidays.	**Objective Evidence Observed:** 1&2) Employee interview, document review

Summary Information

Criteria	**Local Law** *(Please state legal requirement)*	**Actual at the Site** *(Record site results against the law)*	**Is this part of a Collective Bargaining Agreement?**
A: Standard/Contracted work hours: *(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)*	Legal maximum: 45 hours/week	A1: 9 hours/day, 45 hours/week	A2: ☐ Yes ☒ No (There is no CBA)
B: Overtime hours: *(Maximum legal and actual overtime hours, please state if possible per day, week, and month)*	Legal maximum: 11 total working hours per day (regular + overtime), 270 overtime hours per year	B1: 52.5 hours in October 2021(maximum overtime)	B2: ☐ Yes ☒ No (There is no CBA)
C: Wage for standard/contracted hours: *(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)*	Legal minimum: Since January 1st, 2021: 3.577,50 TL(Gross); 2,557.59 TL (Net) Since January 1st, 2022: 5004 TL (Gross) and 4253,40 TL (Net)	C1: Since January 1st, 2022: 5004 TL (Gross) and 4253,40 TL (Net)	C2: ☐ Yes ☒ No (There is no CBA)

D: Overtime wage: *(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)*	Legal minimum: 150% of the regular rate of pay for all overtime practices	D1: 150% for all overtimes	D2: ☐ Yes ☒ No (There is no CBA)

Wages analysis:

Wages analysis: *(Click here to return to Key Information)*		
A: Were accurate records shown at the first request?	☒ Yes ☐ No	
A1: If **No**, why not?	N/A	
B: Sample Size Checked *(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)*	Time and wage records are submitted for last 12 months (from July 2021 to June 2022) 26 employees' records were reviewed for June 2022 (last paid and peak month), January 2022 (non-peak month) and October 2021 (random month).	
C: Are there different legal minimum wage grades? If **Yes**, please specify all.	☐ Yes ☒ No	C1: If **Yes**, please give details: N/A
D: If there are different legal minimum grades, are all workers graded and paid correctly?	☐ Yes ☐ No ☒ N/A	D1: If **No**, please give details: N/A
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	☐ Below legal min ☒ Meet ☒ Above	E1: Lowest actual wages found: *Note: full time employees and please state hour / week / month etc.* Since January 1st, 2022: 5004 TL (Gross) and 4253,40 TL (Net)
F: Please indicate the breakdown of workforce per earnings:	F1: __0__% of workforce earning under minimum wage F2: _8__% of workforce earning minimum wage F3: _92_% of workforce earning above minimum wage	
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: Each month, employees receive shopping vouchers of 200 TL depending on their performance. *Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.*	
H: What deductions are required by law e.g. social insurance? Please state all types:	Social insurance and taxes	

I: Have these deductions been made?	☒ Yes ☐ No	I1: Please list all deductions that **have** been made.	1. Social insurance 2. Tax 3. Unemployment benefit Please describe: Legal deductions
		I2: Please list all deductions that **have not** been made.	N/A Please describe: All legally required deductions were made on wage.
J: Were appropriate records available to verify hours of work and wages?	☒ Yes ☐ No		
K: Were any inconsistencies found? (if yes describe nature)	☐ Yes ☒ No	K1: Type ☐ Poor record keeping ☐ Isolated incident ☐ 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)	☒ Yes ☐ No L1: Please give details: It was verified with interviews that all worked times were reflected on the provided records.		
M: Is there a defined living wage: *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.*	☐ Yes ☒ No M1: Please specify amount/time: N/A		
M2: If yes, what was the calculation method used.	☐ ISEAL/Anker Benchmarks ☐ Asia Floor Wage ☐ Figures provided by Unions ☐ Living Wage Foundation UK ☐ Fair Wear Wage Ladder ☐ Fairtrade Foundation Other – please give details: N/A		
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	☐ Yes ☒ No N1: Please give details: Minimum wages are updated at the beginning of each year by the Ministry of Labour and Social Security. There is no basic need wage implementation in the company to be updated or reviewed.		
O: Are workers paid in a timely manner in line with local law?	☒ Yes ☐ No		
P: Is there evidence that equal rates are being paid for equal work:	☒ Yes ☐ No		

	P1: Please give details: It was confirmed with worker interviews and document review.
Q: How are workers paid:	☐ Cash ☐ Cheque ☒ Bank Transfer ☐ Other Q1: If other, please explain: N/A

6: Working Hours are not Excessive

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:
Working hours are arranged as, From Monday to Friday:
07:30 to 17:30 including 15'x2 tea breaks and 60' lunch break x 5 days

Working hours for pregnant workers are arranged as, From Monday to Friday:
07:30 to 17:30 including 30'x2 tea breaks and 90' lunch break x 5 days

Working hours for breast-feeding worker are arranged as, From Monday to Friday:
07:30 to 16:00 including 15'x2 tea breaks and 60' lunch break x 5 days

Time recording system is based on electronic card system.

Time and wage records are submitted for last 12 months (from July 2021 to June 2022)
26 employees' records were reviewed for June 2022 (last paid and peak month), January 2022 (non-peak month) and October 2021 (random month).

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 employees and management.

Any other comments: None

Non–compliance:	
1. Description of non–compliance: ☐ NC against ETI code: ☐ NC against Local Law ☐ NC against customer 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

Working hours' analysis

Working hours' analysis
Please include time e.g. hour/week/month
(Go back to Key information)

Systems & Processes		
A. What timekeeping systems are used: time card etc.	*Describe: Electronic card system*	
B: Is sample size same as in wages section?	☒ Yes ☐ No B1: If no, please give details	
C: Are standard/contracted working hours defined in **all** contracts/employment agreements?	☒ Yes ☐ No	*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:
D: Are there any other types of contracts/employment agreements used?	☐ Yes ☒ No	*D1: If YES, please complete as appropriate:* ☐ 0 hrs ☐ Part time ☐ Variable hrs ☐ Other If "Other", Please define: *NA*
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	☐ Yes ☒ No	*E1: If **yes**, please detail hours, %, types of workers affected and frequency* Please give details:
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: ☒ 1 in 7 days ☐ 2 in 14 days ☐ No If 'No', please explain:	F3: Is this allowed by local law? ☒ Yes ☐ No
	Maximum number of days worked without a day off (in sample):	
	6 consecutive days	
Standard/Contracted Hours worked		
G: Were standard working hours over 48 hours per week found?	☐ Yes ☒ 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?	☐ Yes ☐ No N/A	H1: If yes, please give details: *N/A*
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: June 2022 = 39 hours/month January 2022 = 14 hours/month October 2021 = 52.5 hours/month	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	☐ Yes ☒ No	
K: Approximate percentage of total workers on highest overtime hours:	*__30__%*	
L: Is overtime voluntary?	☒ Yes ☐ No ☐ Conflicting Information	*L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements:* *Interviews, procedures*
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	☒ Yes ☐ No ☐ 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%* of the regular rate of pay for all overtime practices
N: Is overtime paid at a premium?	☒ Yes ☐ No	*N1: If yes, please describe % of workers & frequency:* All employees (100%), monthly
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.	☐ No ☐ Consolidated pay *(May be standard wages above minimum legal wage, with no/low overtime premium)* ☐ Collective Bargaining agreements ☐ Other N/A	
	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other	

	N/A
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	☐ **Overtime is voluntary** ☐ Onsite Collective bargaining allows 60+ hours/week ☐ Safeguards are in place to protect worker's health and safety ☐ Site can demonstrate exceptional circumstances ☐ Other reasons (please specify)
	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:
	N/A
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	☐ Yes ☒ No Q1: If yes, please give details: N/A
R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	☐ Yes ☐ No N/A

7: No Discrimination is practiced

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

A: Gender breakdown of Management + Supervisors *(Include as one combined group)*	A1: Male: 9 % A2: Female 91%
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	2 Production and Planning Engineer
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?	☐ Hiring ☐ Compensation ☐ Access to training ☐ Promotion ☐ Termination or retirement ☒ No evidence of discrimination found C1: Please give details: N/A

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.

B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	☒ Yes ☐ No If no, please give details:

Non–compliance:	
1. Description of non–compliance: ☐ NC against ETI code**:** ☐ NC against Local Law ☐ NC against customer 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

8: Regular Employment Is Provided

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.
A copy of employment contract was given to employees.

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:	
1. Description of non–compliance: ☐ NC against ETI code: ☐ NC against Local Law ☐ NC against customer 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

Responsible Recruitment

All Workers	
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?	☒ Terms & Conditions presented ☒ Understood by workers ☒ Same as actual conditions A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	☐ Yes ☒ No B1: If yes, please describe details and specific category(ies) of workers affected:

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

Migrant Workers: *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*		
A: Type of work undertaken by migrant workers:	N/A	
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: N/A B2: Total number of (outside of local country) recruitment agencies used: N/A	
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?	☐ Yes ☐ No C1: Please describe finding: N/A	C2: Observations: N/A
D: Are Any migrant workers in skilled, technical, or management roles *Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)*	☐ Yes ☒ No D1: If yes, number and example of roles:	

NON-EMPLOYEE WORKERS

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

Agency Workers (if applicable) *(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)*	
A: Number of agencies used (average):	A1: Names if available: N/A
B: Were agency workers' age / pay / hours included within the scope of this audit?	☐ Yes ☐ No N/A
C: Were sufficient documents for agency workers available for review?	☐ Yes ☐ No N/A
D: Is there a legal contract / agreement with all agencies?	☐ Yes ☐ No D1: Please give details: N/A
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	☐ Yes ☐ No E1: Please give details: N/A

Contractors: *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,	
A: Any contractors on site?	☒ Yes ☐ No A1: If yes, how many contractors are present, please give details: 2
B: If **Yes**, how many workers supplied by contractors?	EUROSERVE Cleaning: 2 (1 female, 1 male) Security: 3 males EUREST SOFRA Kitchen: 2 females
C: Do all contractor workers understand their terms of employment?	☒ Yes ☐ No C1: Please describe finding: N/A
D: If **Yes**, please give evidence for contractor workers being paid per law:	They are paid as per law; this was reviewed through payroll records.

8A: Sub–Contracting and Homeworking:

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:
Subcontractors are not used.
*Cutting process is performed at company's İzmir location.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):
Details:
Production records, purchase orders.

Non–compliance:

1. Description of non–compliance:	**Objective evidence observed:**
☐ 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	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

Summary of sub–contracting – if applicable ☒ 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	☐ Yes NA ☐ No Please describe:
B: If sub–contractors are used, is there evidence this has been agreed with the main client?	☐ Yes NA ☐ No If **Yes**, summarise details:
C: Number of sub–contractors/agents used:	NA
D: Is there a site policy on sub–contracting?	☐ Yes NA ☐ No If **Yes**, summarise details:
E: What checks are in place to ensure no child labour is being used and work is safe?	NA

Summary of homeworking – if applicable ☒ Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	☐ Yes ☐ 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?	☐ Directly ☐ Through Agents N/A	C1: If through agents, number of agents: N/A	
D: Is there a site policy on homeworking?	☐ Yes ☐ No N/A		

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?	☐ Yes ☐ No G1: Please give details: N/A
H: Are full records of homeworkers available at the site?	☐ Yes ☐ No N/A

9: No Harsh or Inhumane Treatment is allowed

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

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?	☒ Yes ☐ 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.
B: If **Yes**, are workers aware of these channels and have access? Please give details.	Workers are aware of these channels. There are published, anonymous and/or open channels available for reporting any violations of Labour standards
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Suggestion boxes, worker representatives, open door policy
D: Which of the following groups is there a grievance mechanism in place for?	☒ Workers ☒ Communities ☒ Suppliers ☐ Other D1: Please give details: Suggestion boxes, worker representatives, open door policy are used for employees.
E: Are there any open disputes?	☐ Yes ☒ No E1: If yes, please give details The facility records disputes.
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)	☒ Yes ☐ No F1: If no, please give details N/A
G: Is there a published and transparent disciplinary procedure?	☒ Yes ☐ No G1: If no, please explain N/A
H: If yes, are workers aware of these the disciplinary procedure?	☒ Yes ☐ No H1: If no, please give details N/A

I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	☐ Yes ☒ No I1: If yes, please give details

Current Systems and Evidence Examined

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

Current systems:
There was no evidence of any physical abuse or discipline, the threat of physical abuse, sexual or any other types of harassment or verbal abuse as well as any other forms of intimidation were not noted, as confirmed by the interviews.
Disciplinary regulation was complaint with the legal regulations.
No disciplinary action was taken.

Evidence examined – 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 box check book was checked.
- Employee interviews were conducted
- The relevant policy on prevention of harassment and abuse
- Internal grievance procedure documentation.
- Training records

Any other comments: None

Non–compliance:	
1. Description of non–compliance: ☐ NC against ETI code**:** ☐ NC against Local Law ☐ NC against customer 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

10 A: Entitlement to Work and Immigration

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 was no migrant worker.

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 10B2: Environment 2–Pillar

(Click here to return to summary of findings)

To be completed for a 2–Pillar SMETA Audit, and remove the following page which is 10B4 environment 4 pillar

10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.
10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.
Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.

Current Systems and Evidence Examined

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

Current systems:
Environmental and EIA (Environmental Impact Assessment) exception decision letters available.
Wastewater discharge permit is available.
Hazardous wastes are given to authorized agencies for disposal.
There is a written environment policy of the facility.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):
Details:
Environmental documents such as procedures, legal letters…

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 10B2: Environment 2–Pillar

(Click here to return to summary of findings)

To be completed for a 2–Pillar SMETA Audit, and remove the following page which is 10B4 environment 4 pillar

10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.
10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.
Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.

Current Systems and Evidence Examined

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

Current systems:
Environmental permit and EIA (Environmental Impact Assessment) exception decision letters available.
Wastewater discharge permit is available.
Hazardous wastes are given to authorized agencies for disposal.
There is a written environment policy of the facility.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):
Details:
Environmental documents such as procedures, legal letters…

Any other comments: None

Non–compliance:	
1. Description of non–compliance: ☐ NC against ETI code: ☐ NC against Local Law: ☐ NC against customer 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

Other findings

Other Findings Outside the Scope of the Code
NONE

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

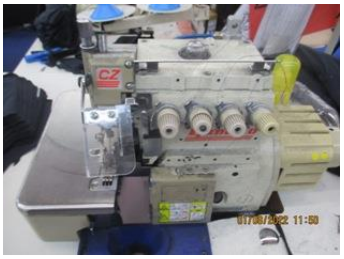
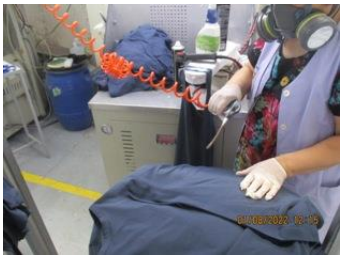
Appendix 1

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

OUTVIEW OF THE FACILITY	ASSEMBLY POINT	ANNOUNCEMENT BOARD
LOCKER ROOM	TOILET	SUGGESTION AND COMPLAINT BOX
FIRE HOSE	FIRE EXTINGUISHER	FIRST AID KIT

EVACUATION PLAN	FIRE ALARM BUTTON	POTABLE WATER
		
VENTILATION	SEWING	EYE GUARD
		
INSULATING MAT	STAIN REMOVAL	EYE WASH SOLUTION
QC	IRONING	PACKAGING

HEAT PRESS	LUNCH HALL	MEDICAL ROOM

NON-COMPLIANCE PHOTO

NC PHOTO 1 There are no rechargeable lamps on the for warehouse and production area doors.	NC PHOTO 2 Secondary containers were not provided for chemicals in chemical warehouse and maintenance areas.	NC PHOTO 3 Secondary containers were not provided for chemicals in chemical warehouse and maintenance areas.

For more information visit: Sedexglobal.com

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

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

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

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

Click here for Supplier (B) members:

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d

Click here for Auditors:

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