




# Sedex Members Ethical Trade Audit Report

Version 6.0



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 1027292	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 1000835
Business name (Company name):	BRAVO TEKIL ITHALAT IHACAT SAN.VE TIC.LTD.STI		
Site name:	BRAVO TEKIL ITHALAT IHACAT SAN.VE TIC.LTD.STI		
Site address: <i>(Please include full address)</i>	YARIMBURGAZ MAH.CUMHURIYET CAD.FILIZ SOKAK NO:56 KUCUKCEKMECE / ISTANBUL	Country:	TURKEY
Site contact and job title:	BIRSEN SAHINBAS – ACCOUNTING RESPONSIBLE		
Site phone:	0090 212 592 56 40	Site e-mail:	muhasebe@bravotekstil.net
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety	<input checked="" type="checkbox"/> Environment <input type="checkbox"/> Business Ethics
Date of Audit:	21/02/2019		

<b>Audit Company Name &amp; Logo:</b>  	<b>Report Owner (payee):</b>  <b>BRAVO TEKIL ITHALAT IHACAT SAN.VE TIC.LTD.STI</b>
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Audit Conducted By					
Commercial	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

## 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 6.0 April 2017 was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

(2) The audit scope was against the following reference documents

### 2-Pillar SMETA Audit

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

### 4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)

(3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non compliances on both the audit report, CAPR and on Sedex.

(4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

## SMETA Declaration

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

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

Any exceptions to this must be recorded here (e.g. different sample size):	NONE
Auditor Team (s) (please list all including all interviewers):	SIBEL BALCI
Lead auditor:	SIBEL BALCI
Team auditor:	-
Interviewers:	SIBEL BALCI
Report writer:	SIBEL BALCI
Report reviewer:	-
Audit Company Report Reference:	RBS19-208
Date of declaration:	28/02/2019

*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.*

## Non-Compliance Table

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	

0A	<a href="#">Universal Rights covering UNGP</a>			<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None</li> </ul>
0B	<a href="#">Management systems and code implementation</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None</li> </ul>
1.	<a href="#">Freely chosen Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None</li> </ul>
2	<a href="#">Freedom of Association</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None</li> </ul>
3	<a href="#">Safety and Hygienic Conditions</a>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	2			<ul style="list-style-type: none"> <li>There was no automatic extinguishing systems for hood in the kitchen.</li> <li>It was noted that the height of 1 of 2 emergency exit doors at lunch was under 200 cm</li> </ul>
4	<a href="#">Child Labour</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None</li> </ul>
5	<a href="#">Living Wages and Benefits</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>			2	<ul style="list-style-type: none"> <li>None</li> </ul>
6	<a href="#">Working Hours</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None</li> </ul>
7	<a href="#">Discrimination</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None</li> </ul>

8	Regular Employment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1			<ul style="list-style-type: none"> <li>According to the total number of employees, the company didn't have enough handicapped worker. ( There was only one handicapped worker.)</li> </ul>
8A	Sub-Contracting and Homeworking		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None</li> </ul>
9	Harsh or Inhumane Treatment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None</li> </ul>
10A	Entitlement to Work		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None</li> </ul>
10B2	Environment 2-Pillar		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> <li>None</li> </ul>
10B4	Environment 4-Pillar		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	<ul style="list-style-type: none"> <li>N/A</li> </ul>
10C	Business Ethics		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	<ul style="list-style-type: none"> <li>N/A</li> </ul>

General observations and summary of the site:

- The company is a manufacturer of knitted outwear for both
- BIRSEN SAHINBAS – ACCOUNTING RESPONSIBLE was responsible to ensure that the company's implementations in compliance with ETI Base Code
- There were totally 105 employees including 26 white collared employees onsite.
- There was no migrant employee in the company.
- The youngest worker was 21 years old.
- There was no trade union in the company.
- There were 2 worker representatives in the company.
- There were 10 male and 16 female workers in management and among supervisors.
- Peak seasons are; From March to August
- 10 workers were sampled for interviews. 6 individual and 1 group interview (4 workers at once ) were conducted with 5 male and 5 female workers)
- No specific complaint was raised during worker interviews. Workers were aware of grievance systems.
- 10 employees' time records were reviewed for the last 12 months as per SMETA Guidance.
- All employees were paid at least legal minimum wage.

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

## Site Details

Site Details																										
A: Company Name:	BRAVO TEKIL ITHALAT IHACAT SAN.VE TIC.LTD.STI																									
B: Site name:	BRAVO TEKIL ITHALAT IHACAT SAN.VE TIC.LTD.STI																									
C: GPS location: (if available)	GPS Address: 41 03 23.7 N 28 45 18.4 E	Latitude: 41.056591 Longitude: 28.755113																								
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Workplace opening and operating permit number and date: 212176 and 17/01/2019. ( Temporary licence)																									
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc.	Knitted outdoor for both genders and kids.																									
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<table border="1"> <thead> <tr> <th>Production Building no</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Floor -3</td> <td>Another company</td> <td>Totally isolated and taken out of the audit scope</td> </tr> <tr> <td>Floor - 2</td> <td>Another company</td> <td>Totally isolated and taken out of the audit scope</td> </tr> <tr> <td>Floor -1</td> <td>Another company</td> <td>Totally isolated and taken out of the audit scope</td> </tr> <tr> <td>Entrance</td> <td>Another company</td> <td>Totally isolated and taken out of the audit scope</td> </tr> <tr> <td>Floor 1</td> <td>Cutting section,sewing section,ironin&amp;packing section,offices , lavatory</td> <td>None</td> </tr> <tr> <td>Floor 2</td> <td>Lunch hall, changing room, lavatory</td> <td>None</td> </tr> <tr> <td>Is this a shared building?</td> <td>Yes</td> <td>Audited company was totally isolated from other companies.</td> </tr> </tbody> </table>		Production Building no	Description	Remark, if any	Floor -3	Another company	Totally isolated and taken out of the audit scope	Floor - 2	Another company	Totally isolated and taken out of the audit scope	Floor -1	Another company	Totally isolated and taken out of the audit scope	Entrance	Another company	Totally isolated and taken out of the audit scope	Floor 1	Cutting section,sewing section,ironin&packing section,offices , lavatory	None	Floor 2	Lunch hall, changing room, lavatory	None	Is this a shared building?	Yes	Audited company was totally isolated from other companies.
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		Therefore other companies were taken out of the audit scope.
	<p>BRAVO TEKSTİL İTHALAT İHACAT SAN.VE TİC.LTD.ŞTİ was established in 1998 as a manufacturer of knitted outdoor wear for both genders. The company moved to current address in 2012</p> <p>Total closed area occupied by the company is about 2100 square meters.</p> <p>There were cutting, sewing, ironing&amp;packing processes in the company. Printing and embroidery processes was outsourced.</p> <p>Main product: Knitted outdoor wear for both genders and kids</p> <p>Population layout: Administration: 10 male, 16 female Production: 35 male, 44 female</p> <p>Total workforce also includes: Handicapped worker : 1</p> <p>Regular weekly working hours was arranged as follows: From 08:00 to 18:30 (including 20'x2 tea breaks and 50 minutes lunch break) x 5 days= 45 hours/week</p> <p>Time recording system: Digital fingerprint activated computer database system</p> <p>Payment day: 10<sup>th</sup> of each month via bank.</p> <p>Visible structural integrity issues (large cracks) observed?</p> <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No Details: No visible structural integrity issue was observed. Does the site have a structural engineer evaluation?</p> <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No Please give details: The company had a building structure construction permit that ensures the building had the seismic design in terms of architectural science</p>	
G: Site function:	<p><input type="checkbox"/> Agent</p> <p><input checked="" type="checkbox"/> Factory Processing/Manufacturer</p> <p><input type="checkbox"/> Finished Product Supplier</p> <p><input type="checkbox"/> Grower</p>	

	<input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor
H: Month(s) of peak season: (if applicable)	From March to August
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	<p>There were cutting, sewing, ironing&amp;packing processes in the company. Printing and embroidery processes was outsourced</p> <p>Basic machine list can be listed below ;</p> <ol style="list-style-type: none"> <li>1- Single needle stitching machine: 16</li> <li>2- Over-lock machine : 17</li> <li>3- Cover stitch machine : 9</li> <li>4- Yarn transfer machine : 1</li> <li>5- Yarn cleaning machine : 2</li> <li>6- Presses : 10</li> <li>7- Thread clipping machine : 4</li> </ol>
J: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (Open door policy, complaint boxes) <input type="checkbox"/> None
K: Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes approx. % of workers
N: Were all site provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No (N/A) If No, please give details

Audit Parameters			
A: Time in and time out	Day 1 Time in: 09:00 Day 1 Time out: 17:00	Day 2 Time in: Day 2 Time out:	Day 3 Time in: Day 3 Time out:
B: Number of auditor days used:	1 (1 Auditor+ 1 Observer)x 1 day		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other  If other, please define		
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 4 weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If No, why not		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If <b>Yes</b> , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	BIRSEN SAHINBAS – ACCOUNTING RESPONSIBLE		
H: Is further information available (If yes please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	05/02/2018		
J: Previous audit type:	PARTIAL OTHER H&S SECTION'S NON COMPLIANCE VERIFICATION		
K: Were any previous audits reviewed for this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  <input type="checkbox"/> N/A		

Audit attendance	Management		Worker Representatives	
	Senior management		Worker Committee representatives	Union representatives
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No (N/A)
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No (N/A)

C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No (N/A)
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	There were 2 worker representatives onsite. One worker representative was included into the worker interview process.		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	There was no unionisation activity in the company.		

## 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 and where they do not intend to remain permanently or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	35 Production+10 Administrative							45
Worker numbers – female	44 Production+16 Administrative							60
Total	105							105
Number of Workers interviewed – male	5							5
Number of Workers interviewed – female	5							5
Total – interviewed sample size	10							10

A: Nationality of Management	Turkish
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<p>B: Nationality of workers <i>Please add more rows as applicable</i></p>	<p>Countries: Country 1: ___Turkish___ Country 2: _____ Country 3: _____</p>
<p>C: For the majority nationality of workers:</p>	<p>Nationality 1 approx % total workforce _____ Nationality 2 approx % total workforce ___100___ Nationality 3 approx % total workforce _____</p>
<p>D: Worker remuneration (<i>management information</i>)</p>	<p>_____ % workers on piece rate ___100___ % hourly paid workers _____ % salaried workers</p> <p>Payment cycle: _____ % daily paid _____ % weekly paid ___100___ % monthly paid _____ % other If other, please give details</p>

<p align="center"><b>Worker Interview Summary</b></p>			
<p>A: Were workers aware of the audit?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>		
<p>B: Were workers aware of the code?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>		
<p>C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i></p>	<p>1 (4 workers at once)</p>		
<p>D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i></p>	<table border="1"> <tr> <td data-bbox="869 1391 1029 1514">Male: 3</td> <td data-bbox="1029 1391 1508 1514">Female: 3</td> </tr> </table>	Male: 3	Female: 3
Male: 3	Female: 3		
<p>E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If no, please give details</p>		
<p>F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>		

G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
H: What was the most common worker complaint?	None
I: What did the workers like the most about working at this site?	Payment on time, friendly environment
J: Any additional comment(s) regarding interviews:	None
K: Attitude of workers to hours worked:	No complaint was raised regarding working hours
L. Is there any worker survey information available?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details:	
M: Attitude of workers: <i>(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</i>	
<p>There were totally 105 workers including 26 administrative workers onsite.</p> <p>10 workers were selected for interviews randomly or according to their age, physically appearance, health care reports, sections or personal file records. 6 individual and 1 group interview (4 workers at once) were conducted confidentially in an isolated meeting room. Their thoughts were asked about the workplace and working conditions.</p> <p>Interviewed workers informed their pleasure about free lunch and transportation, friendship and providing social insurance in the facility. No negative feedback was raised.</p>	
N: Attitude of worker's committee/union reps: <i>(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</i>	
<p>Sampled worker representative stated that workers have no complaints about their social benefits and working environment. Representative stated that they perform meetings with management as a committee on monthly basis to raise the complaints of the workers to management anonymously. No other complaint was raised.</p>	
O: Attitude of managers: <i>(Include attitude to audit, and audit process. Both positive and negative information should be included)</i>	
<p>Upon arrival auditor was greeted by BIRSEN SAHINBAS – ACCOUNTING RESPONSIBLE The company management was kind, cooperative, polite and transparent during the entire audit process.</p>	

## Audit Results by Clause

### 0A: Universal Rights covering UNGP

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

#### 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:** Human rights policy of the company was established.

BIRSEN SAHINBAS – ACCOUNTING RESPONSIBLE was assigned for implementing standards concerning human rights.

Confidential grievance system in place in order to raise the complaints regarding human rights issues.

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

Details: Policies, commitment letters, appointment letters and grievance mechanism were reviewed.

Any other comments: None

A: Policy statement that expresses commitment to respect human rights?

Yes  
 No

Please give details: Human rights policy of the company was reviewed.

B: Does the business have a designated person responsible for implementing standards concerning Human Rights?

Yes  
 No

Please give details:  
Name: BIRSEN SAHINBAS

	Job title: ACCOUNTING RESPONSIBLE
C: Does the businesses have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Confidential grievance system in place in order to raise the complaints regarding human rights issues.
D: Does grievance mechanism meet with UNGP requirement of e.g. (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details: It was clearly verified that the grievance mechanism was accessible to any worker, transparent, legitimate and from this point of view it meets the UNGP requirements.
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All documents of employees (such as ID copies etc.) were kept under controlled conditions by the accountant staff of the company. The company respects data privacy.

<b>Findings : NONE</b>	
Finding: Observation <input type="checkbox"/> Company NC <input type="checkbox"/> Description of observation: NONE Local law or ETI/Additional elements / customer specific requirement: NONE Comments: NONE	<b>Objective evidence observed: N/A</b>

<b>Good examples observed: NONE</b>	
Description of Good Example (GE): NONE	<b>Objective Evidence Observed: N/A</b>



## Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	Last year: 2018 __5__ %	This year: 2019 __1,5__ %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1 <sup>st</sup> day of 90 day period + number of employees on the last day of the 90 day period) / 2]	1,5	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 <sup>st</sup> day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	Last year: 2018 __5__ %	This year: 2019 __1,5__ %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 <sup>st</sup> of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	1,5 %	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Job related accident report draft tasks were available. However no accident was occurred yet.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	Last year: 2018 NONE	This year: 2019 NONE
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]	NONE	
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]	Last year: 2018 NONE	This year: 2019 NONE
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	6 months __0__% workers	12 months __0__% workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	6 months __0__% workers	12 months _____% workers

**0B: Management system and Code Implementation**  
[\(click here to return to NC Table\)](#)

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:**

ETI Base Code was posted on notice board.  
 Facility has appointed a senior member of management who is responsible for compliance with this code.  
 Facility has communicated this code to all employees and suppliers.  
 Workplace opening and operating permit was available and covers all areas.

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

Details: Confirmed with management interview, document review and facility tour.

Any other comments: NONE

**Management Systems:**

<p>A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  Please describe: It was confirmed with management interview.</p>
<p>B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment &amp; abuse?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Please describe: Social compliance policies (such as prohibiting forced labour, child labour, discrimination, harassment and abuse etc.) of the company were reviewed.</p>
<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>Social compliance policies were posted on notice board.</p>
<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment &amp; abuse?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Please describe: Training records were available.</p>

<p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Please describe: Training records were reviewed. All employees were informed regarding social compliance policies at the beginning of recruitment and periodically.</p>
<p>F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  Please describe: The company was not certified to any internationally recognised system.</p>
<p>G: Is there a Human Resources manager/department? If Yes, please detail.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Please describe: The company has well designed HR department.</p>
<p>H: Is there a senior person /manager responsible for implementation of the code</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Please describe: BIRSEN SAHINBAS – ACCOUNTING RESPONSIBLE was in charge to manage for implementation of the Code.</p>
<p>I: Is there a policy to ensure all worker information is confidential</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Please describe: All documents of employees (such as ID copies etc.) were kept under controlled conditions by the accountant staff of the company. The company respects data privacy.</p>
<p>J: Is there an effective procedure to ensure confidential information is kept confidential</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Please describe: All documents of employees (such as ID copies etc.) were kept under controlled conditions by the accountant staff of the company. The company respects data privacy.</p>
<p>K: Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Details: Internal assessments were conducted to evaluate policy and procedure effectiveness.</p>
<p>L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Details: Corrective and preventative action process was in place.</p>
<p>M: Does the facility have a policy/code which require labour standards of its own suppliers?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Details: The company sends a copy of ETI Base Code to its suppliers.</p>

<b>Land rights</b>	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The company has workplace opening and operating permit.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Owner of the company is responsible to conduct legal due diligence to recognise and apply national laws and practices relating to land title.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, how does the company obtain FPIC: The company building was established on a land which has the legal land title belongs to the owner. The company provided the structure permit as well.
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The previous owner of the land was paid by the current land owner. The current land owner is also the owner of the building.
R. Does the Facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input type="checkbox"/> Yes <input type="checkbox"/> No (N/A) Details:
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details: Confirmed during the audit.

<b>Non-compliance: NONE</b>	
<p><b>1. Description of non-compliance: NONE</b></p> <p> <input type="checkbox"/> NC against ETI/Additional Elements      <input type="checkbox"/> NC against Local Law  <input type="checkbox"/> NC against customer code:                     </p> <p><b>Local law and/or ETI requirement: NONE</b></p> <p><b>Recommended corrective action: NONE</b></p>	<p><b>Objective evidence observed: N/A</b></p>

<b>Observation: NONE</b>	
<b>Description of observation: NONE</b> <b>Local law or ETI requirement: NONE</b> <b>Comments: NONE</b>	<b>Objective evidence observed: N/A</b>

<b>Good Examples observed: NONE</b>	
<b>Description of Good Example (GE): NONE</b>	<b>Objective evidence observed: N/A</b>

<b>1: Freely Chosen Employment</b> <a href="#">(Click here to return to NC-table)</a>
<b>ETI</b> 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.

<b>Current Systems and Evidence Examined</b> <i>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.</i>
<b>Current systems:</b> Employment is freely chosen. No guards present during working hours. Movement of employees at the facility is not prohibited or limited. Employees have free access to toilets and drinkable water. Overtimes are always performed on voluntary basis. The factory does not require deposit or withhold employees' ID cards. The factory does not limit the employees' freedom. There is no forced, bonded or involuntary prison labour. Employees are free to leave their employer after reasonable notice.
<b>Evidence examined – to support system description (Documents examined &amp; relevant comments. Include renewal/expiry date where appropriate):</b>  Details: Confirmed with management and employee interviews and facility tour. Labour contracts, company rules and disciplinary rules were reviewed.  Any other comments: None

A: Is there any evidence of retention of original documents, e.g. passports/ID's	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes please give details and category of workers affected : N/A
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B: Is there any evidence of a loan scheme in operation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes please give details and category of worker affected : N/A
C: Is there any evidence of retention of wages /deposits	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes please give details and category of worker affected: N/A
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 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 is a published 'modern day slavery statement.	<input type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding: N/A  <input checked="" type="checkbox"/> Not applicable
G: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe finding : N/A
H: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes please give details and category of workers affected: The company sends ETI Base Code to its supply chain.  <input type="checkbox"/> Not applicable
I: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding: The company sends ETI Base Code to its supply chain and suppliers were visited occasionally in order to prevent forced / trafficked labour issues.

<b>Non-compliance: NONE</b>	
<p><b>1. Description of non-compliance: NONE</b></p> <p><input type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law:    <input type="checkbox"/> NC against customer code:</p> <p><b>Local law and/or ETI requirement: NONE</b></p> <p><b>Recommended corrective action: NONE</b></p>	<p><b>Objective evidence observed: N/A</b></p>

<b>Observation: NONE</b>	
<b>Description of observation: NONE</b> <b>Local law or ETI requirement: NONE</b> <b>Comments: NONE</b>	<b>Objective evidence observed: N/A</b>

<b>Good Examples observed: NONE</b>	
<b>Description of Good Example (GE): NONE</b>	<b>Objective evidence observed: N/A</b>

<b>2: Freedom of Association and Right to Collective Bargaining are Respected</b> <a href="#">(Click here to return to NC-table)</a> <a href="#">(Click here to return to Key Information)</a>
<b>ETI</b>
<p>2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</p> <p>2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</p> <p>2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.</p> <p>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.</p>

<b>Current Systems and Evidence Examined</b> <i>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.</i>
<b>Current systems:</b> There were complaint boxes onsite. Open door policy effectively works. There were 2 freely elected worker representatives. Worker representative election was performed on 29/09/2017 Employees feel free to join trade union as per interviews.
<b>Evidence examined – to support system description (Documents examined &amp; relevant comments. Include renewal/expiry date where appropriate):</b>  Details: Confirmed with management and employee interviews. Complaint box records, worker representative election and meeting records are reviewed.
Any other comments: None

<p>A: What form of worker representation/union is there on site?</p>	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (Open door policy and compliant boxes) <input type="checkbox"/> None	
<p>B: Is it a legal requirement to have a union?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<p>C: Is it a legal requirement to have a worker's committee?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<p>D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&amp;S, sexual harassment)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Describe: Open door policy and compliant box systems were in place to ensure effective worker/management communication.  Is there evidence of free elections? <input type="checkbox"/> Yes (N/A) <input type="checkbox"/> No	
<p>E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: It was confirmed with worker representative interview that worker representative is free to perform meetings with employees. Adequate facilities were provided by the management.	
<p>F: Name of union and union representative, if applicable:</p>	<p>There was no unionisation activity in the company.</p>	<p>Is there evidence of free elections?  <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p>
<p>G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?</p>	<p>There were 2 freely elected worker representatives onsite</p>	<p>Is there evidence of free elections?  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>H: Are all workers aware of who their representatives are?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>I: Were worker representatives freely elected?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Date of last election: 29/09/2017</p>
<p>J: Do workers know what topics can be raised with their representatives?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>K: Were worker representatives/union representatives interviewed?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , please state how many: 1	
<p>L: Please describe any evidence that union/worker's committee is effective?            Specify date of last meeting; topics covered; how minutes were communicated etc.</p>	<p>The last meeting between worker representative and management was performed in February 2019. Grievances of employees were discussed.</p>	



M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If <b>Yes</b> , what percentage by trade Union/worker representation	<u>  N/A  </u> % workers covered by Union CBA	<u>  N/A  </u> % workers covered by worker rep CBA
If <b>Yes</b> , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No (N/A)	

Non-compliance: NONE	
<p><b>1. Description of non-compliance: NONE</b></p> <p><input type="checkbox"/> NC against ETI    <input type="checkbox"/> NC against Local Law    <input type="checkbox"/> NC against customer code:</p> <p><b>Local law and/or ETI requirement: NONE</b></p> <p><b>Recommended corrective action: NONE</b></p>	<p><b>Objective evidence observed: N/A</b></p>

Observation: NONE	
<p><b>Description of observation: NONE</b></p> <p><b>Local law or ETI requirement: NONE</b></p> <p><b>Comments: NONE</b></p>	<p><b>Objective evidence observed: N/A</b></p>

Good Examples observed: NONE	
<p><b>Description of Good Example (GE): NONE</b></p>	<p><b>Objective evidence observed: N/A</b></p>

### 3: Working Conditions are Safe and Hygienic

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

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

#### 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:

The company has jobsite doctor and H&S Specialist.

The last health and safety committee meeting was performed on 19/02/2019

The last periodical inspection of the steam boiler was performed on 24/12/2018

The last periodical inspection of the compressor was performed on 24/12/2018

The last periodical inspection of the freight lift was performed on 03/12/2018

The last electricity grounding test was performed on 15/01/2019

The last electricity infrastructure installation inspection was performed on 15/01/2019

The last drinking water analysis was performed on 28/01/2019

There were 6 first aid certificated employees in the company

The last occupational health and safety training was performed on 18/02/2019

The last firefighting and evacuation drill was performed on 28/01/2019

Firefighting equipments were controlled in November 2018

Job related accidents were recorded.

Hygiene training certificates were obtained for all employees who contact with food.

Emergency preparedness plan was conducted on 19/02/2018

Risk analysis was conducted in September 2018

MSDS of chemicals used in facility were available in production and usage areas.

Indoor working environment condition measurements (noise, illumination, dust, VOC, thermal comfort, vibration) were conducted in February 2014

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

Details: Periodical inspection records of pressured equipments, health check reports, H&S training records, drinking water analysis records, risk analysis record, first aid trained workers' certificates, fire equipment control records etc. were reviewed.

Any other comments: None

<p>A: Does the facility have general and occupational Health &amp; Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: Health and safety policy was prepared and communicated to all workers. There was an occupational health and safety specialist of the company. The last occupational health and safety committee meeting was performed on 19/02/2019</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: H&amp;S rules and procedures of the company were distributed to whole workforce in a documented way.</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Details: Workplace opening and operating permit covers all areas.</p>
<p>D: Are visitors to the site informed on H&amp;S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: Visitors were informed on H&amp;S and provided required personal protective equipment.</p>
<p>E: Is a medical room or medical facility provided for workers?  If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: There was an infirmary in the company which meets legal requirements.</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: There were jobsite doctor and 6 first aid certificated employees onsite.</p>
<p>G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: The company works with professional transportation company.</p>

<p>H: Is secure personal storage space provided for workers in their living space and is it fit for purpose?</p>	<p><input type="checkbox"/> Yes (N/A) <input type="checkbox"/> No Details: There was no dormitory in the company.</p>
<p>I: Are H&amp;S Risk assessments conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Risk assessment was performed in September 2018 and reviewed periodically by an external OHS expert.</p>
<p>J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Environmental impact assessment exception decision letter was reviewed. (Document number and date: 42756616 and 17/03/2017)</p>
<p>K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: There was no banned chemical in the company</p>

<p style="text-align: center;"><b>Non-compliance: 1</b></p>	
<p><b>1. Description of non-compliance:</b> There was no automatic extinguishing systems for hood in the kitchen.  <input type="checkbox"/> NC against ETI      <input checked="" type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:</p> <p><b>Local law and/or ETI requirement:</b> In accordance with the Regulation Protection Of Buildings Against Fire (19.12.2007), art 57 (1) Except from residential buildings, it is essential to install automatic extinguishing systems for kitchens and hoods that serve more than 100 people, and gas detection, gas cutting and warning installations according to the characteristics of the gas used in the quarries.</p> <p><b>Recommended corrective action:</b> It is recommended that automatic extinguishing system should be installed.</p>	<p><b>Objective evidence observed:</b>  <i>Site tour and Management Declaration</i></p>

**Non-compliance: 2**

**1. Description of non-compliance:** It was noted that the height of 1 of 2 emergency exit doors at lunch was under 200 cm.

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

**Local law and/or ETI requirement:**

- In accordance with the Regulation on Protection of Buildings against Fire (19.12.2007), Art 47, (1) the net width of the evacuation exit door cannot be less than 80 cm and it height cannot be less than 200 cm. The revolving doors and turnstiles cannot be accepted as evacuation exit doors.
- (2) The evacuation exit doors should be opened outside if there are more than 50 persons in the place. They should not be locked and should be opened manually
- (3) The evacuation exit doors should not infiltrate the smoke and fire resistant at least 60 minutes if it is serving less than 4 floors and at least 90 minutes if it serving more than 4 floors.
- (4) The width of one wing doors cannot be less than 80 cm and more than 120 cm.
- (5) All evacuation exit doors opening safe place at the ground level and if there are more than 100 persons in one floor, evacuation exit stairs, evacuation corridors and fire safety hall doors should be opened outward without using door bars.
- (6) The doors should be opened by using at most 110 N force

In accordance with The Turkish Regulation on the Health and Safety Measures Taken for the Buildings and Their Additions (17.07.2013), Appendix I Art 10 – ç the railing system doors or turnstiles cannot be accepted as evacuation exit doors, emergency exit doors should be opened outwards to ensure employees can open and arrive easily.

**Recommended corrective action:** The height of the emergency exit door should be at least 200 cm.

**Objective evidence observed:**  
Site tour and Management Declaration

**Observation: NONE**

**Description of observation: NONE**

**Local law or ETI requirement: NONE**

**Recommended corrective action: NONE**

**Objective evidence observed: N/A**

**Good Examples observed: NONE**

**Description of Good Example (GE): NONE**

**Objective Evidence Observed: N/A**

**4: Child Labour Shall Not Be Used**

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

**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:** There was no child/juvenile worker on site. Youngest worker was 21 years old.

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

Details: There was no child/juvenile worker on site. Youngest worker was 21 years old.

Any other comments: None

A: Legal age of employment:	Completed 15
B: Age of youngest worker found:	21 years old.
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0 %
E: Are workers under 18 subject to hazardous work assignments? <a href="#">(Go to clause 3 – Health and Safety)</a>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details

**Non-compliance: NONE**

**1. Description of non-compliance: NONE**

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

**Local law and/or ETI requirement: NONE**

**Recommended corrective action: NONE**

**Objective evidence observed: N/A**

**5: Living Wages are Paid**

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

**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:**

Wages are paid on time 10<sup>th</sup> of each month via bank.  
 All employees are given a detailed pay slip.  
 All employees were covered with social security.

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

Details: Confirmed with employee, management interviews and document review (i.e: payment records, social insurance fund, annual leave records, pay slips etc.) in accordance with SMETA Best Practice Guidance and Local Law.

Any other comments: None

**Non-compliance: NONE**

**1. Description of non-compliance: NONE**

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

**Local law and/or ETI requirement: NONE**

**Recommended corrective action: NONE**

**Objective evidence observed: N/A**

**Observation: NONE**

**Description of observation: NONE**

**Objective evidence observed: N/A**



<p><b>Local law or ETI requirement: NONE</b></p> <p><b>Comments: NONE</b></p>	
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<b>Good Examples observed: 2</b>	
<p><b>Description of Good Example (GE):</b>                  1-Transportation is provided in free of charge to employees.                  2-Meal is provided in free of charge to employees.</p>	<p><b>Objective Evidence Observed:</b> Worker interviews, management declaration, document review</p>

**Summary Information**

<b>Criteria</b>	<b>Local Law</b> <i>(Please state legal requirement)</i>	<b>Actual at the Site</b> <i>(Record site results against the law)</i>	<b>Is this part of a Collective Bargaining Agreement?</b>
<p>A: Standard/Contracted work hours:  <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i></p>	<p>Legal maximum:                      45 hours/week for adult workers.                      40 hours/week and 8 hours/day for the workers between 15 – 18 years old.                      7 hours and 30 minutes/day for pregnant workers                      7 hours and 30 minutes/day for night shift</p>	<p>45 hours / week</p>	<p><input type="checkbox"/> Yes (N/A)  <input type="checkbox"/> No</p>
<p>B: Overtime hours:  <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i></p>	<p>Legal maximum: 270 hours per year</p>	<p>220 hours / year</p>	<p><input type="checkbox"/> Yes (N/A)  <input type="checkbox"/> No</p>
<p>C: wage for standard/contracted hours:  <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i></p>	<p>Legal minimum: 2.558,40 TL (Gross) 1,829,02 TL (Net) Since January 2019</p>	<p>2.558,40 TL (Gross)</p>	<p><input type="checkbox"/> Yes (N/A)  <input type="checkbox"/> No</p>

<p>D: overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</p>	<p>Legal minimum: 150% of hourly wage for each working practice duration over 45 hours/week. (This is the only overtime wage premium defined in Turkish labour law)</p>	<p>150% of hourly wage</p>	<p><input type="checkbox"/> Yes (N/A) <input type="checkbox"/> No</p>
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<p align="center"><b>Wages analysis:</b> <i>(Click here to return to Key Information)</i></p>		
<p>A: Were accurate records shown at the first request?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>If <b>No</b>, why not?</p>	<p>N/A</p>	
<p>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)</p>	<p>10 employees' payment records were reviewed for the last 12 months as per SMETA Guidance.</p>	
<p>C: Are there different legal minimum wage grades? If <b>Yes</b>, please specify all.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>If <b>Yes</b>, please give details:</p>
<p>D: If there are different legal minimum grades, are all workers graded and paid correctly?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p>	<p>If <b>No</b>, please give details:</p>
<p>E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?</p>	<p><input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input checked="" type="checkbox"/> Above</p>	<p>Lowest actual wages found: Note: 2558,40 TL (Gross)</p>
<p>F: Please indicate the breakdown of workforce per earnings:</p>	<p>___% of workforce earning under min wage __50__% of workforce earning min wage __50__% of workforce earning above min wage</p>	
<p>F: Bonus scheme found: Please specify details:</p>	<p>Bonus Scheme found: Note: No bonus scheme was applied</p>	

<p>H: What deductions are required by law e.g. social insurance? Please state all types:</p>	<p>Social insurance, tax, unemployment benefit</p>		
<p>I: Have these deductions been made? Please list all deductions that have/have not been made.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Please list all deductions that <b>have</b> been made.</p>	<p>1. Social insurance 2. Tax 3. Unemployment benefit</p> <p>Please describe:</p>
		<p>Please list all deductions that <b>have</b> not been made.</p>	<p>N/A</p> <p>Please describe: – All legally required deduction were made on wage.</p>
<p>J: Were appropriate records available to verify hours of work and wages?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
<p>K: Were any inconsistencies found? (if yes describe nature)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> Poor record keeping <input checked="" type="checkbox"/> No <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:		
<p>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)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: It was verified with interviews that all worked times were reflected on the provided records.		
<p>M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please specify amount/time: N/A		
<p>If yes, what was the calculation method used.</p>	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details:		
<p>N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: It was confirmed with worker interviews and document review.
Q: How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other If other, please explain:

**6: Working Hours are not Excessive**

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

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

**ETI**

6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.

6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where **all** of the following are met:

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

6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

**Current Systems and Evidence Examined**

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

**Current systems:**

Regular weekly working hours was arranged as follows:  
From 08:00 to 18:30 (including 20'x2 tea breaks and 50 minutes lunch break) x 5 days= 45 hours/week

Time recording system: Digital fingerprint activated computer database system

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

Details: 10 employees' time records were reviewed for the last 12 months as per SMETA Guidance.

Any other comments: NONE

**Non-compliance: NONE**

**1. Description of non-compliance: NONE**

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

**Local law and/or ETI requirement: NONE**

**Recommended corrective action: NONE**

**Objective evidence observed: N/A**

**Observation: NONE**

**Description of observation: NONE**

**Local law or ETI requirement: NONE**

**Comments: NONE**

**Objective evidence observed: N/A**

**Good Examples observed: NONE**

**Description of Good Example (GE): NONE**

**Objective Evidence Observed: N/A**

<b>Working hours' analysis</b> Please include time e.g. hour/week/month ( <a href="#">Go back to Key information</a> )		
<b>Systems &amp; Processes</b>		
A. What timekeeping systems are used: time card etc.	Describe: Digital fingerprint activated computer database system	
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details	
C: Are standard/contracted working hours defined in <b>all</b> contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, please complete as appropriate:	
	<input type="checkbox"/> 0 hrs <input type="checkbox"/> Part time <input type="checkbox"/> Variable hrs <input type="checkbox"/> Other	
	If "Other", Please define:	
	N/A	
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 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?	Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Maximum number of days worked without a day off (in sample):	
	6 days	

Standard/Contracted Hours worked		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, % of workers & frequency:  N/A
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<i>If YES, please give details</i> Regulation based on working hours which cannot be split to weekdays (Official gazette date ; 06.04.2004 / 25425 ; Art 5 ; At any business practice which are involved in this regulation , weekly working hours in a working period can be defined more or less than 45 hours/week. However, average of weekly working hour cannot exceed 45 hours in any case.
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours:	25 hours/month in January 2019 20 hours/month in December 2018 23 hours/month in October 2018
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	__50__%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	<i>Please detail evidence e.g. Wording of contract/employment agreement/handbook/worker interviews/refusal arrangements: It was confirmed with worker interviews</i>
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	<i>Please give details of normal day overtime premium as a % of <b>standard</b> wages: 150% of hourly wage for each working practice duration over 45 hours/week.</i>
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<i>If yes, please describe % of workers &amp; frequency: 150% of hourly wage for each working practice duration over 45 hours/week.</i>

<p>O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.</p>	<p><input type="checkbox"/> No  <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium)  <input type="checkbox"/> Collective Bargaining agreements  <input type="checkbox"/> Other</p> <p>Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p> <p>N/A</p>
<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p>	<p><input type="checkbox"/> <b>Overtime is voluntary</b>  <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week  <input type="checkbox"/> Safeguards are in place to protect worker's health and safety  <input type="checkbox"/> Site can demonstrate exceptional circumstances  <input type="checkbox"/> Other reasons (please specify)</p> <p>Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p> <p>N/A</p>
<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No          If yes, please give details:</p>
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>



**7: No Discrimination is Practiced**

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

**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:** There was 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.

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

Details: Confirmed with employee, management interviews and document review in accordance with SMETA Best Practice Guidance and Local Law.

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	Male: <u>  38  </u> % Female <u>  62  </u> %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	#: There were 16 female staff who were charged in technical and key roles.
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?:	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> access to training <input type="checkbox"/> promotion <input type="checkbox"/> termination or retirement

**Professional Development**

A: What type of training and development are available for workers?

Please give details: All workers were given occupational health and safety and quality trainings periodically.

<p>B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If no, please give details: N/A</p>
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Non-compliance: NONE	
<p><b>1. Description of non-compliance: NONE</b></p> <p><input type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:</p> <p><b>Local law and/or ETI requirement: NONE</b></p> <p><b>Recommended corrective action: NONE</b></p>	<p><b>Objective evidence observed: N/A</b></p>

Observation: NONE	
<p><b>Description of observation: NONE</b></p> <p><b>Local law or ETI requirement: NONE</b></p> <p><b>Comments: NONE</b></p>	<p><b>Objective evidence observed: N/A</b></p>

Good Examples observed: NONE	
<p><b>Description of Good Example (GE): NONE</b></p>	<p><b>Objective Evidence Observed: N/A</b></p>

**8: Regular Employment Is Provided**

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

**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:** All workers have their well-prepared personal files and signed labour contracts.

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

Details: Document review (personnel files and labour contracts) and worker declarations.

Any other comments: None

**Non-compliance: 1**

**1. Description of non-compliance:** According to the total number of employees, the company didn't have enough handicapped worker. (There was only one handicapped worker.)

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

**Local law and/or ETI requirement:** Disabled and ex-convict worker working conditions;

**Objective evidence observed: Document Review and Management Declaration**

<p>Article 30 – (Update: 15.05.2008 – 5763/2 number)          Company owners, who have more than fifty or more workers in their private company should hire three percent disabled worker or in public corporations four percent disabled worker and two percent ex-convict worker or workers whose situation is suitable; as per 21.06.1927 date and 1111 number Military Law or 16.06.1927 date and 1076 number reserve officer Military Law and this worker has to had an injury regarding 12.04.1991 date and 3713 number Counter terrorism Law article 21 during his military job; should hired in a suitable work as their special situation. The company branches which are in the same city will be calculated the total number of its workers.</p> <p>ETI 8.2</p> <p><b>Recommended corrective action:</b> It is recommended that sufficient handicapped worker should be employed.</p>	
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<b>Observation: NONE</b>	
<b>Description of observation: NONE</b>  <b>Local law or ETI requirement: NONE</b>  <b>Comments: NONE</b>	<b>Objective evidence observed: N/A</b>

<b>Good Examples observed: NONE</b>	
<b>Description of Good Example (GE): NONE</b>	<b>Objective Evidence Observed: N/A</b>

### Responsible Recruitment

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

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

<b>Migrant Workers:</b>			
<i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national and where they do not intend to remain permanently or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i>			
A: Type of work undertaken by migrant workers:	There was no migrant worker in the company		
B: Migrant worker recruitment	Total number of (in country recruitment agencies) used: - Total number of (outside of local country) recruitment agencies used: -		
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?	<table border="0" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> <input type="checkbox"/> Yes (N/A)  <input type="checkbox"/> No            Please describe finding: (N/A)         </td> <td style="width: 50%; vertical-align: top;"> <input type="checkbox"/> Yes (N/A)  <input type="checkbox"/> No            Please describe finding: (N/A)         </td> </tr> </table>	<input type="checkbox"/> Yes (N/A) <input type="checkbox"/> No Please describe finding: (N/A)	<input type="checkbox"/> Yes (N/A) <input type="checkbox"/> No Please describe finding: (N/A)
<input type="checkbox"/> Yes (N/A) <input type="checkbox"/> No Please describe finding: (N/A)	<input type="checkbox"/> Yes (N/A) <input type="checkbox"/> No Please describe finding: (N/A)		
D: Are any migrant workers in skilled, technical, or management roles  <i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i>	<input type="checkbox"/> Yes (N/A) <input type="checkbox"/> No  If Yes number and example of roles: N/A		

**NON-EMPLOYEE WORKERS**

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

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

If yes, please give details.	Please give details:
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<b>Contractors:</b>	
<i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i>	
A: Any contractors on site?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, how many contractors are present, please give details:
B: If <b>Yes</b> , how many workers supplied by contractors?	
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding:
D: If <b>Yes</b> , please give evidence for contractor workers being paid per law:	

<b>8A: Sub-Contracting and Homeworking</b>
<a href="#">(Click here to return to NC-table)</a> <a href="#">(Click here to return to Key Information)</a>
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. <p style="text-align: center;"><i>Note to auditor on homeworking:</i></p> <p style="text-align: center;"><i>Report on whether it is direct or via agents. How many workers, relationship with site and what control systems are in place.</i></p> <p style="text-align: center;"><i>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</i></p>

<b>Current Systems and Evidence Examined</b>
<i>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.</i>
<p><b>Current systems:</b> Printing and embroidery processes were outsourced.</p> <p><b>Evidence examined – to support system description (Documents examined &amp; relevant comments. Include renewal/expiry date where appropriate):</b></p>

**If any processes are sub-contracted – please populate below boxes**

Process Subcontracted	PRINTING PROCESS	EMBROIDERY PROCESS
Name of factory	ARTSAN TEKSTIL TRANSFER KAGITLARI SAN.VE DIS TIC.LTD.STI	EBRU TEKSTIL NAKIS SAN.VE TIC.LTD.STI
Address	CUMHURİYET MAHALLESİ ASIK VEYSEL CAD. NO:99NKUCUKCEKMECE / ISTANBUL	MAHMUTBEY MAH.2662 SOKAK NO:8 BAGCILAR/ ISTANBUL

Details: NONE

**Non-compliance: NONE**

**1. Description of non-compliance: NONE**

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

**Local law and/or ETI /Additional Elements requirement: NONE**

**Recommended corrective action: NONE**

**Objective evidence observed: N/A**

**Observation:**

**Description of observation: NONE**

**Local law or ETI/Additional elements requirement: NONE**

**Comments: NONE**

**Objective evidence observed: N/A**

**Good Examples observed: NONE**

**Description of Good Example (GE): NONE**

**Objective Evidence Observed: N/A**

**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  
 No  
 Please describe: Auditor made calculation and it match with management statements



B: If sub-contractors are used, is there evidence this has been agreed with the main client?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , summarise details: All subcontractors were informed to relevant clients.
C: Number of sub-contractors/agents used:	2
D: Is there a site policy on sub-contracting?	<input type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , summarise details: Subcontracting policy was documented
E: What checks are in place to ensure no child labour is being used and work is safe?	ID card copies were checked during internal audits performed.

Summary of homeworking – if applicable <input checked="" type="checkbox"/> Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , summarise details:		
B: Number of homeworkers	Male:	Female:	Total:
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents		If through agents, number of agents:
D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
E: How does the site ensure worker hours and pay meet local laws for homeworkers?			
F: What processes are carried out by homeworkers?			
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No  Please give details:		
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No		

**9: No Harsh or Inhumane Treatment is Allowed**

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

**ETI**

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

Additional elements:

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

<p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&amp;S or any other grievances to a 3<sup>rd</sup> party?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Please describe: The hotline number of the Ministry of Labour and Social Security (Hotline: 170) is posted at notice boards for workers to raise any issue to official authorities.</p>
<p>B: If <b>Yes</b>, are workers aware of these channels and have access? Please give details.</p>	<p>Workers stated that they were aware of this channel during the interviews.</p>
<p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<p>Open door policy, compliant boxes, freely elected worker representatives</p>
<p>D: Which of the following groups is there a grievance mechanism in place for?</p>	<p><input checked="" type="checkbox"/> Workers  <input type="checkbox"/> Communities  <input type="checkbox"/> Suppliers  <input type="checkbox"/> Other                   Please give Details: Open door policy, compliant boxes, freely elected worker representatives</p>
<p>E: Are there any open disputes?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                   If yes, please give details : N/A</p>
<p>F: Does the site encourage its business partners (e.g., suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. help lines or whistle blowing mechanism)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                   If no, please give details: N/A</p>
<p>G: Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  If No Please give details : N/A</p>
<p>H: If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  If no, please give details</p>

<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details
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**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 physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation which confirmed by worker interviews. Confidential grievance mechanism was in place.

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

Details: No finding noted regarding this section. Confirmed with employee interviews and grievance records.

Any other comments: None

**Non-compliance: NONE**

<p><b>1. Description of non-compliance: NONE</b></p> <p><input type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:</p> <p><b>Local law and/or ETI requirement: NONE</b></p> <p><b>Recommended corrective action: NONE</b></p>	<p><b>Objective evidence observed: N/A</b></p>
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**Observation: NONE**

<p><b>Description of observation: NONE</b></p> <p><b>Local law or ETI requirement: NONE</b></p> <p><b>Comments: NONE</b></p>	<p><b>Objective evidence observed: N/A</b></p>
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**Good Examples observed: NONE**

<p><b>Description of Good Example (GE): NONE</b></p>	<p><b>Objective Evidence Observed: N/A</b></p>
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**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:** No migrant/agency employee in the facility.

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

Details: Confirmed with interviews and document review in accordance with SMETA Best Practice Guidance and Local Law.

Any other comments: None

**Non-compliance: NONE**

**1. Description of non-compliance: NONE**

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

**Local law and/or ETI /Additional Elements requirement: NONE**

**Recommended corrective action: NONE**

**Objective evidence observed: N/A**

**Observation: NONE**

**Description of observation: NONE**

**Local law or ETI/Additional Elements requirement: NONE**

**Comments: NONE**

**Objective evidence observed: N/A**

**Good examples observed: NONE**

**Description of Good Example (GE): NONE**

**Objective Evidence Observed: N/A**

**10. Other issue areas 10B2: Environment 2-Pillar**

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

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 impact assessment exception decision letter was reviewed. (Document number and date: 42756616 and 17/03/2017)

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

Details: No finding noted. Confirmed with document review (Waste control documents, procedures, policies and logs.) and site tour.

Any other comments: NONE

**Non-compliance: NONE**

**1. Description of non-compliance: NONE**

NC against ETI/Additional Elements  NC against Local Law

**Local law and/or ETI/Additional Elements requirement: NONE**

**Recommended corrective action: NONE**

**Objective evidence observed: N/A**

**Observation: NONE**

**Description of observation: NONE**

**Local law or ETI/additional elements requirement: NONE**

**Comments: NONE**

**Objective evidence observed: N/A**

**Good examples observed: NONE**

<b>Description of Good Example (GE): NONE</b>	<b>Objective Evidence Observed: N/A</b>
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<b>Other Findings Outside the Scope of the Code</b>
NONE

<b>Community Benefits</b> <i>(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)</i>
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

<p><b>NOTE:</b> The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.</p>	<p><b>Instruction to Audit Company:</b> fill in the relevant clauses from the Customer Supplier Code - where applicable.</p>
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ETI Code / Additional Elements	Customer's Supplier Code equivalent
<p><b>0.A. Universal Rights covering UNGP</b></p> <p><b>0.A. Guidance for Observations</b>                      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.</p>	<p><b>0.A. Universal Rights covering UNGP</b></p>

<p>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.</p> <p>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.</p>	
<p><b>0.B. Management Systems &amp; Code Implementation</b></p>	<p><b>0.B. Management Systems &amp; Code Implementation</b></p>
<p>0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p> <p>0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.</p> <p>0.3 Suppliers are expected to communicate this Code to all employees.</p> <p>0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</p>	
<p><b>ETI 1. Forced Labour</b></p>	<p><b>ETI 1. Forced Labour</b></p>
<p>1.1 There is no forced, bonded or involuntary prison labour.</p> <p>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.</p>	
<p><b>ETI 2. Freedom of association and the right to collective bargaining are respected</b></p>	<p><b>ETI 2. Freedom of association and the right to collective bargaining are respected</b></p>
<p>2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</p> <p>2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</p> <p>2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.</p> <p>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.</p>	
<p><b>ETI 3. Working conditions are safe and hygienic</b></p>	<p><b>ETI 3. Working conditions are safe and hygienic</b></p>

<p>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.</p> <p>3.2 Workers shall receive regular and recorded Health &amp; Safety training, and such training shall be repeated for new or reassigned workers.</p> <p>3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.</p> <p>3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.</p> <p>3.5 The company observing the code shall assign responsibility for Health &amp; Safety to a senior management representative.</p>	
<p><b>ETI 4. Child labour shall not be used</b></p>	<p><b>ETI 4. Child labour shall not be used</b></p>
<p>4.1 There shall be no new recruitment of child labour.</p> <p>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.</p> <p>4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.</p> <p>4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.</p>	
<p><b>ETI 5. Living wages are paid</b></p>	<p><b>ETI 5. Living wages are paid</b></p>
<p>5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.</p> <p>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.</p> <p>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</p>	



<p>permission of the worker concerned. All disciplinary measures should be recorded.</p>	
<p><b>ETI 6. Working Hours are not excessive</b></p>	<p><b>ETI 6. Working Hours are not excessive</b></p>
<p>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.</p> <p>6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.</p> <p>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.</p> <p>6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.</p> <p>6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where <b>all</b> of the following are met:</p> <ul style="list-style-type: none"> <li>- this is allowed by national law;</li> <li>- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;</li> <li>- appropriate safeguards are taken to protect the workers' health and safety; and</li> <li>- The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.</li> </ul> <p>6.6 Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.</p>	
<p><b>ETI 7. No discrimination is practised</b></p>	<p><b>ETI 7. No discrimination is practised</b></p>
<p>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,</p>	

marital status, sexual orientation, union membership or political affiliation.	
<b>ETI 8. Regular employment is provided</b>	<b>ETI 8. Regular employment is provided</b>
<p>8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p>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.</p> <p><b>Additional Elements: Responsible Recruitment</b></p> <p>8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.</p> <p>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.</p> <p>8.5 Employment agencies must only supply workers registered with them.</p> <p>8.6 Workers pay no recruitment fee at any stage of the recruitment process.</p> <p>8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.</p>	
<b>8A: Sub-Contracting and Homeworking</b>	<b>8A: Sub-Contracting and Homeworking</b>
<p>8A.1 There should be no sub-contracting unless previously agreed with the main client.</p> <p>8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.</p>	
<b>ETI 9. No harsh or inhumane treatment is allowed</b>	<b>ETI 9. No harsh or inhumane treatment is allowed</b>
<p>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.</p>	

<p>Additional elements: 9.2 companies should provide access to a confidential grievance mechanism for all workers</p>	
<p><b>10. Other Issue areas: 10A: Entitlement to Work and Immigration</b></p>	
<p><b>Additional Elements</b> 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.</p>	
<p><b>10. Other issue areas 10B2: Environment 2–Pillar</b></p>	
<p>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. <i>Note for auditors and readers, This is not a full environmental assessment but a check on basic systems and management approach.</i></p>	

## Photo Form

<p>Outside view of the company</p>	<p>Cutting section</p>	<p>Sewing section</p>
<p>Overlock machine with eye guard</p>	<p>Fabric warehouse</p>	<p>Ironing section</p>
<p>Packing section</p>	<p>Stain removal room</p>	<p>ETI Base Code posted on the wall</p>

<p>Electric control panel with rubber mat</p>	<p>First aid kit</p>	<p>Emergency exit door</p>
<p>Fire extinguisher</p>	<p>Fire alarm button</p>	<p>Potable water</p>
<p>Evacuation plan</p>	<p>NC: It was noted that the height of 1 of 2 emergency exit doors at lunch was under 200 cm.</p>	<p>NC: There was no automatic extinguishing systems for hood in the kitchen.</p>

	
Changing room	Lavatory



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**[Click here for Supplier \(B\) members:](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgLY_2brg_3d_3d)**

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