



Sedex Members Ethical Trade Audit Report

Version 6.0



Audit Details

Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 1042677	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS:1059761
Business name (Company name):	BUSE TEKSTIL ve INS. SAN. TIC. LTD. STI.		
Site name:	BUSE TEKSTIL ve INS. SAN. TIC. LTD. STI.		
Site address: <i>(Please include full address)</i>	Cobancesme Mah. Kalender Sokak, No:5 Bahcelievler, / Istanbul	Country:	Turkey
Site contact and job title:	Erkan Caliskan / Factory Manager		
Site phone:	0212 504 90 20	Site e-mail:	ik@buse.com.tr
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:			

Audit Company Name & Logo:



Report Owner (payee):

BUSE TEKSTIL ve INS. SAN. TIC. LTD. STI.

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): NA			

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):

The firm has recently moved to its new location in a 7 storey building (12.04.2019). After changing the address, the factory has increased the number of employees from 28 in 2018 to 98 recently. Considering the sample size, a vast majority of the production employees have joined the firm at March-April 2019. Therefore, while selecting the sample size, four out of ten sampled employees may not have a time records and payslips due to the fact that they are joined recently and have no history in the firm, but yet selected because there is no other option to choose another alternative in the production section and they are important to interview (such as Worker Representative, young worker etc.) to have a better understanding of the firm.

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

Lead auditor:
 Team auditor:
 Interviewers:
 Report writer:

Ogulcan Faruk Erentay
 N/A
 Ogulcan Faruk Erentay
 Ogulcan Faruk Erentay

Report reviewer:	Mohammad Mozibul Haque Masum
Audit Company Report Reference:	CA.2019/015
Date of declaration:	06.05.2019

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)</i> Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>		0	0	<ul style="list-style-type: none"> N/A N/A
0B Management systems and code implementation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2	0	0	<ul style="list-style-type: none"> NC-1: Employees are not aware of the company social policies and ETI Base Code Requirements. NC-2: There are no systems in place to monitor site's own suppliers against social standards.
1. Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> N/A N/A
2 Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> N/A N/A
3 Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	5	2	0	<ul style="list-style-type: none"> NC-1: Fire training in the firm dated 30.04.2019 does not cover all employees in the firm. NC-2: The main entry door, that has

									<p>been identified as emergency exit gate is a shutter gate, does not open outwards.</p> <ul style="list-style-type: none"> • NC-3: The internal emergency exit route through stairs inside the building are not marked and secondary sourced lightening unit is not available. • NC-4: The production sections in each floor have emergency exit gates that are sliding glass doors, which does not comply with the local law. • NC-5: The medical room in the building is not available for use. • OBS-1: During the audit date, fire alarm maintenances and instalments were being under check. The auditor monitored and recorded that fire alarm is active (in the third floor) but the alarm system was not fully ready by the time of the audit. • OBS-2: Because of the fact that the time keeping mechanism (finger scanner/electronic card reader) is not ready, employees are keeping and signing timesheets manually. Therefore, in the month March, no certain information regarding timekeeping can be concluded.
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> • N/A • N/A
5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	1	<ul style="list-style-type: none"> • GE-1: Free lunch and transportation is

									provided to the employees.
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> • N/A • N/A
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> • N/A • N/A
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> • N/A • N/A
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> • N/A • N/A
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> • N/A • N/A
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> • N/A • N/A
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> • N/A • N/A
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	<ul style="list-style-type: none"> • Not Applicable • Not Applicable

10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	<ul style="list-style-type: none"> • Not Applicable • Not Applicable
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General observations and summary of the site:

During the audit, 7 (seven) Non Conformities, 2 (two) Observations and 1 (one) Good Practise has been observed.

- NC-1: Employees are not aware of the company social policies and ETI Base Code Requirements.
- NC-2: There are no systems in place to monitor site's own suppliers against social standards
- NC-3: Fire training in the firm dated 30.04.2019 does not cover all employees in the firm.
- NC-4: The main entry door, that has been identified as emergency exit gate is a shutter gate, does not open outwards.
- NC-5: The internal emergency exit route through stairs inside the building are not marked and secondary sourced lightening unit is not available.
- NC-6: The production sections in each floor have emergency exit gates that are sliding glass doors, which does not comply with the local law.
- NC-7: The medical room in the building is not available for use.
- OBS-1: During the audit date, fire alarm maintenances and instalments were being under check. The auditor monitored and recorded that fire alarm is active (in the third floor) but the alarm system was not fully ready by the time of the audit.
- OBS-2: Because of the fact that the time keeping mechanism (finger scanner/electronic card reader) is not ready, employees are keeping and signing timesheets manually. Therefore, in the month March, no certain information regarding timekeeping can be concluded.
- GE-1: Free lunch and transportation is provided to the employees.

The site is consisted of 7 storey buildings. The firm has just moved to the new location at 12.04.2019 which is 3 weeks prior to the audit date and considerably increased its number of workers to 98. Although the firm started production, there were preparations on going in terms of relocation. Mr. Erkan Caliskan, Factory Manager greeted the auditor and was very helpful during the process. He mentioned that the firm increased its number of employees and moved to the current address recently. He granted access to every part of the factory and signed the CAP Report.

**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:	BUSE TEKSTIL ve INS. SAN. TIC. LTD. STI.																												
B: Site name:	BUSE TEKSTIL ve INS. SAN. TIC. LTD. STI.																												
C: GPS location: (if available)	GPS Address: Cobancesme Mah. Kalender Sokak, No:5 Bahcelievler, / Istanbul	Latitude: 40.9936317 Longitude: 28.8265926																											
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Building Registration Letter: 40LD3B28, 07.07.2018 Trade Registry Gazette: 22.02.2019, 9773 Business Opening Operating Permit: 17.01.2019 Fire Safety Report: 22.01.2019 / 28																												
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc.	Knitwear Production (Tricot)																												
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Buse Tekstil was established in 2004 as tricot (knitwear) production facility in Istanbul city, Turkey. On 12.04.2019, the firm moved to its new current location. According to the Building Registration Letter, total area of the building is 4.020 m2. The building has 7 floors in total.</p> <table border="1"> <thead> <tr> <th>Production Building no</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Floor -2</td> <td>Offices, Toilets, Water Tanks, QC Tables, Sewing Area, Washing and Drying, Compressor Room</td> <td></td> </tr> <tr> <td>Floor -1</td> <td>Accessories Depot, Emergency Exit Ramp, Warehouse, Dispatch</td> <td></td> </tr> <tr> <td>Ground Floor</td> <td>Ironing, QC Area, Packaging, Dressing Rooms, Offices, Kitchen, Toilets, Lobby, Boiler Room</td> <td></td> </tr> <tr> <td>Floor 1</td> <td>Knitting Machines, Patch Room, Toilets, Yarn Room</td> <td></td> </tr> <tr> <td>Floor 2</td> <td>Sewing, Modelling, Linking, Offices, Warehouse</td> <td></td> </tr> <tr> <td>Floor 3</td> <td>Management Section, Toilets, Meeting Rooms, Showroom, Accounting</td> <td></td> </tr> <tr> <td>Floor 4</td> <td>Showroom, Doctors Room, Cafeteria, Toilets</td> <td></td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td></td> </tr> </tbody> </table>		Production Building no	Description	Remark, if any	Floor -2	Offices, Toilets, Water Tanks, QC Tables, Sewing Area, Washing and Drying, Compressor Room		Floor -1	Accessories Depot, Emergency Exit Ramp, Warehouse, Dispatch		Ground Floor	Ironing, QC Area, Packaging, Dressing Rooms, Offices, Kitchen, Toilets, Lobby, Boiler Room		Floor 1	Knitting Machines, Patch Room, Toilets, Yarn Room		Floor 2	Sewing, Modelling, Linking, Offices, Warehouse		Floor 3	Management Section, Toilets, Meeting Rooms, Showroom, Accounting		Floor 4	Showroom, Doctors Room, Cafeteria, Toilets		Is this a shared building?	No	
Production Building no	Description	Remark, if any																											
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	<p>Buse Tekstil is a national firm, working for both domestic market and export. The percentage of production for export and domestic market is %50-%50, where considering export; major countries that the products are sent to are England, Spain, Germany, Holland and Italy.</p> <p>The processes in the firm are: Designing, modelling, knitting, washing, ironing, packaging, depot and dispatch. The monthly capacity of production is 200.000 pieces, where approximately %50 percent of the production are through subcontractors.</p> <p>The working hours for the employees vary. Management and production staff (except knitting and garment) work between: Monday to Friday, 08.45 to 18.30, with two 15 minutes tea break at 10.00 to 10.15 and 16.00-16.15 along with 1 hour meal break between 12.30-13.30. Saturday is a half day work, from 08.45 to 12.30.</p> <p>Garment Workers work between 08.30 to 18.30, with 2 tea breaks for 15 minutes at 10.00 and 16.00 along with 30 minutes meal break at 13.00. Garment workers do not work on Saturday</p> <p>For knitting section, there are 3 shifts; 07.00-15.00, 15.00-23.00 and 23.00-07.00 with 30 minutes of meal-rest break.</p> <p>Cafeteria is for 120 individuals, and meals were ordered from a catering company.</p> <p>Payments are done through bank, at latest 10th of each month.</p> <p>There is one young worker in the firm, F.S., was born in 02.08.2002 and entered into employment at 25.04.2019. F.S. was 17 when employed.</p> <p>For below, please add any extra rows if appropriate.</p> <p>Visible structural integrity issues (large cracks) observed?</p> <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>Please give details: No cracks observed.</p> <p>Does the site have a structural engineer evaluation?</p> <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>Please give details: There is no evaluation.</p>
<p>G: Site function:</p>	<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)	June to December
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	Designing, modelling, knitting, washing, ironing, packaging, depot and dispatch. There are 64 knitting machine, 21 sewing machine, 9 ironing, 3 washing 6 drying machine
J: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (specify): Worker Representation <input type="checkbox"/> None
K: Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes <input 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, please give details

Audit Parameters			
A: Time in and time out	Day 1 Time in: 08.45 Day 1 Time out: 18.15	Day 2 Time in: Day 2 Time out:	Day 3 Time in: Day 3 Time out:
B: Number of auditor days used:	1 MAN DAY (1 Auditor 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 checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail: weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If No, why not: The firm did not prepared SAQ for review.		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Erkan Caliskan-Factory manager		
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:	13.03.2018		
J: Previous audit type:	SMETA / Periodic		
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	N/A		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	There was no Union at site.		

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	52	0	0	0	0	0	0	52
Worker numbers – female	46	0	0	0	0	0	0	46
Total	98	0	0	0	0	0	0	98
Number of Workers interviewed – male	6	0	0	0	0	0	0	6
Number of Workers interviewed – female	4	0	0	0	0	0	0	4
Total – interviewed sample size	10	0	0	0	0	0	0	10

A: Nationality of Management	Turkish
B: Nationality of workers <i>Please add more rows as applicable</i>	Countries: Country 1: Turkey Country 2: _____ Country 3: _____
C: For the majority nationality of workers:	Nationality 1 approx % total workforce 100 Nationality 2 approx % total workforce _____ Nationality 3 approx % total workforce _____
D: Worker remuneration (<i>management information</i>)	_____ % workers on piece rate _____ % hourly paid workers _____ % salaried workers Payment cycle: _____ % daily paid _____ % weekly paid

	100 % monthly paid _____ % other If other, please give details
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Worker Interview Summary	
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Were workers aware of the code?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	1 Group of 4 Individuals
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	Male: 3 Female: 3
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
H: What was the most common worker complaint?	No specific complaint heard
I: What did the workers like the most about working at this site?	Payment on time, work is defined
J: Any additional comment(s) regarding interviews:	N/A
K: Attitude of workers to hours worked:	Indifferent
L. Is there any worker survey information available?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>If yes, please give details:</i>	
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>	
Attitude of workers to the audit was indifferent. They stated that payments are on time, working hours are defined, everyone knows their duty so that there is work order, working environment is positive. When they	

have personal or work related problems, they can easily refer these to their section chief or worker representative, or sometimes directly to the managers, which, they think, are considered and solved.

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

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

Auditor interviewed with worker representative Mrs. Zeynep Dursun. Conversation with her allowed auditor to have a better understanding of the workplace.

O: Attitude of managers:

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

Factory Manager Erkan Caliskan was extremely helpful and transparent to the audit process. He allowed auditor to access every part of the factory.

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: The firm has social policy, and along with the ETI Base Code they were hang on the notification board. The designated person responsible for implementing standards concerning human rights is Mrs. Zekiye Yigit, HR Responsible. The firm has transparent system in place for confidentially reporting and dealing with human rights impacts without fear of reprisal towards the reporter.

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

Details: Social Policy and signed ETI Base Code of the firm, document review, management declaration, worker representative declaration, employee interviews and site tour.

Any other comments: N/A

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details (mainly applicable for the parent company): Human Rights Policy and Procedures were available.</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:</p>

	Name: Mrs. Zekiye Yigit Job title: HR 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: Open Door Policy, Wish and Complaint Box, Grievance Mechanism
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:
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: Workers information available in the HR Personnel Files are kept confidential and only designated HR Personnel can access to it.

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

Good examples observed: None	
Description of Good Example (GE): None	Objective Evidence Observed: None

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 11 %	This year: 2019 3.88 %
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 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	3.88 %	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	Last year: Not Provided	This year Not Provided
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	Not Provided	Not Provided
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Not Provided	
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: Number: Not Provided	This year: Number: Not Provided
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]	Not Provided	Not Provided
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: Not Provided	This year: Not Provided
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 0 % 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: Mrs. Zekiye Yigit / HR Responsible is responsible for the implementation of the Code. ETI Base Code, is hanged on the notification board for the employees. The work instructions, timetable and emergency instructions were available. The firm is operating legally with the correct business licences and permissions. Land right permissions and related documentation is available.

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

Details:

1. Business Opening and Operating Permit
2. Signed ETI Base Code available on the notification board
3. Company Social Policy and Procedures

Any other comments: N/A

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 give details:</p>
<p>B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: A social compliance policy and procedure established that reduce the risk of forced labour, child labour, discrimination, harassment and abuse issues were taken.</p>
<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>Social compliance rules was announced to the employees via notice board</p>
<p>D: Have managers and workers received training in the standards for forced labour, child labour,</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

discrimination, harassment & abuse?	Please give details: Training in these topics are not available.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
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).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
G: Is there a Human Resources manager/department? If Yes, please detail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There is HR Department Responsible; Zekiye Yigit.
H: Is there a senior person /manager responsible for implementation of the code	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Mrs. Zekiye Yigit is responsible for the implementation of the Code.
I: Is there a policy to ensure all worker information is confidential	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: It is written in the employment contracts and ethical behaviour policy.
J: Is there an effective procedure to ensure confidential information is kept confidential	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Only designated HR Personnel can access HR Employee Files.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Risk assessment does not include policy effectiveness.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is no code that require labour standards of its own suppliers.
Land rights	

<p>N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Building Registration Letter: 40LD3B28, 07.07.2018</p>
<p>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?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Building Registration Letter ensures that systems are in place.</p>
<p>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</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, how does the company obtain FPIC:</p>
<p>Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Building Registration Letter proves that compensation is in place.</p>
<p>R: Does the Facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is no consideration of specific land acquisition.</p>
<p>S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is not any evidence of illegal appropriation of land</p>

Non-compliance:

1. Description of non-compliance: Although the firm has social policy and signed ETI Base Code handed on the notification board employees are not aware of the company social policies and ETI Base Code Requirements.

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

Local law and/or ETI requirement: This violated SMETA Measurement Criteria Clause 0.B.9: ETI Base Code or client specific codes have been communicated to on-site workers including, local labour laws/labour rights and how this has been done e.g. posters, worker trainings etc. (In cases where literacy level is low, what method of communication is used).

Recommended corrective action: The firm shall ensure that ETI Base Code Requirements are shared with employees through trainings in order to ensure that employees are aware of the Code Requirements and Company Social Policies.

Objective evidence observed: Observed through employee interviews and worker representative interview

<p>2. Description of non-compliance: There are no systems in place to monitor site's own suppliers against social standards.</p> <p><input checked="" type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement: This violated SMETA Measurement Criteria 0.B.10-11: The site shall "Establishes what action is taken to communicate and implement the code in its own supply chain e.g. to raw material suppliers." and "the site has a list of subcontractors (where relevant) and has communicated /monitored labour standards at these subcontractors.</p> <p>Recommended corrective action: The firm shall have a system in place to monitor site's own suppliers against social standards.</p>	<p>Objective evidence observed:</p> <p>Observed through document review and management declaration.</p>
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Observation: None	
<p>Description of observation: None</p> <p>Local law or ETI requirement: N/A</p> <p>Comments: None</p>	<p>Objective evidence observed: None</p>

Good Examples observed: None	
<p>Description of Good Example (GE): None</p>	<p>Objective evidence observed: None</p>

1: Freely Chosen Employment

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

ETI

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

Current Systems and Evidence Examined

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

Current systems: During this audit 10 (ten) worker's files were sampled and found that the factory does not hold any original documents such as official ID cards, educational certificates, etc. Factory management directly recruited all workers. According to workers' information, workers can move freely inside the work premises without any restriction to toilets or breaks. There is no forced, bonded or involuntary prison labour at the site.

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

Details: Verified through Policy documents, Personnel files (10 samples), Management Declaration, Worker Contracts and Worker interviews

Any other comments: N/A

<p>A: Is there any evidence of retention of original documents, e.g. passports/ID's</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details and category of workers affected:</p>
<p>B: Is there any evidence of a loan scheme in operation</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details and category of workers affected:</p>
<p>C: Is there any evidence of retention of wages /deposits</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details and category of workers affected:</p>
<p>D: Are there any restrictions on workers' freedom to terminate employment?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe finding: Workers can freely terminate the employment.</p>
<p>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.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding: <input checked="" type="checkbox"/> Not applicable</p>

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: It was verified through employee interviews that workers can leave the site freely at the end of the work day.
H: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please give details and category of workers affected: <input checked="" type="checkbox"/> Not applicable
I: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe finding: The site is operating within the law, it is not applicable for the site.

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

Observation: None	
Description of observation: None Local law or ETI requirement: N/A Comments: None	Objective evidence observed: None

Good Examples observed: None	
Description of Good Example (GE): None	Objective evidence observed: None

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems: There is no Union on site. However, workers can freely join in trade unions. There is a worker representation on site and during the audit, auditor have interviewed with Mrs. Zeynep Dursun. Worker representative. It was understood and concluded that worker representatives are not discriminated against their role and can freely function their responsibility in the factory.

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

Details: It was verified through worker representative interview, employee interviews and management declaration.

Any other comments: N/A

A: What form of worker representation/union is there on site?	<input type="checkbox"/> Union (name) <input type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (specify) Worker Representation <input type="checkbox"/> None
B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Describe: Open door policy, wish and complaint box

	Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The firm provides facilities to allow the worker representatives to conduct their business.	
F: Name of union and union representative, if applicable:		Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Worker Representatives	Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Date of last election: 24.04.2019
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes , please state how many: Zeynep Dursun, worker representative was interviewed.	
L: Please describe any evidence that union/worker's committee is effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i>	Worker representative Zeynep Dursun is also member of Disciplinary Board. Last meeting date is 02 May 2019.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If Yes , what percentage by trade Union/worker representation	____% workers covered by Union CBA	____% workers covered by worker rep CBA
If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No	

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

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

Good Examples observed:	
<p>Description of Good Example (GE): None</p>	<p>Objective evidence observed: None</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: In order to ensure that safe and hygienic working environment is present at the factory, in addition to the risk analysis; periodical inspection records of pressured equipment, health check reports, electricity grounding records, health & safety training records, first aid trained workers' certificates, hygiene certificates of the kitchen personnel, fire equipment control records, fire evacuation drills and training records, fire alarms, internal ambient measurements and etc. were checked.

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

Details:

- Risk Analysis latest review date is 26.04.2019
- Emergency Action Plan is dated 26.04.2019
- Latest Internal Ambient Measurements were done in 08.04.2019
- Hygiene certificates are available for the kitchen staff.
- First Aid Certificate numbers are sufficient and available.
- Periodic inspection records of pressured equipment and lifting equipment are valid, dated 02.05.2019.
- The factory has 1 contracted workplace doctor, contract date is 15.04.2019
- There is 1 OHS Specialist, contract date is 15.04.2019
- Fire equipment controls are available and latest Fire Safety Training was given on 30.04.2019

Any other comments: N/A

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?

Yes

No

Please give details: Policies and procedures are available and these are communicated to workers during orientation.

<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:</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 Please give details: There are no structural additions without permits/inspections.</p>
<p>D: Are visitors to the site informed on H&S and provided with personal protective equipment</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Auditor provided PPE during the site tour.</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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Although there is a defined room for medical room, it is empty and not ready for use.</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 Please give details: First aiders are available and there is a contracted workplace doctor.</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 Please give details: The transportation is fit for purpose.</p>
<p>H: Is secure personal storage space provided for workers in their living space and is it fit for purpose?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Dressing rooms are available and it is fit for the purpose.</p>
<p>I: Are H&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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Risks identified in the risk assessment were eliminated properly and OHS expert of the company followed potential risks regularly.</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 Permit is pending, Letter of EIA is available, dated 22.04.2019.</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 give details: No process was observed to damage the environment in the company.</p>

Non-compliance: 5

1. Description of non-compliance: Fire training in the firm dated 30.04.2019 does not cover all employees in the firm.

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

Local law and/or ETI requirement

In accordance with regulations based on emergency situations at workplaces Art 13/1: In order to monitor and verify the feasibility on each step of prepared emergency plan; drills should be performed at least once a year, audited and reviewed in order to take corrective and preventative actions. Reports which include the date of the drill, observed deficiencies and corrective actions regarding those deficiencies should be prepared.

In accordance with the Regulation on Protection Of Buildings Against Fire (19.12.2007), ARTICLE 129- (1) Personnel of emergency teams; the firefighting and civil defense organizations are used in the areas of fire protection, fire extinguishing, rescue of life and property, first aid activities, cooperation with fire brigade and organization in the responsibility of the building owner, manager or supervisor and the exercises and knowledge and skills are increased. The crew and other officials in the building will be given practical training on how to use fire extinguishers and materials and how to get to the fire as soon as possible. There is at least one extinguishing and evacuation exercise in the building.

This violated SMETA Measurement Criteria 6.0, Article 3.1: A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

Recommended corrective action: The factory shall ensure that fire training covers all employees in the firm.

2. Description of non-compliance: The main entry door, that has been identified as emergency exit gate is a shutter gate, does not open outwards which does not comply with the local regulations.

NC against ETI NC against Local Law NC against customer

Objective evidence observed-1:

Observed through document review, worker interviews and management declaration

Objective evidence observed-2:

Observed through site

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 its 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 be fire resistant at least 60 minutes if it is serving less than 4 floors and at least 90 minutes if 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."

This violated SMETA Measurement Criteria 6.0, Article 3.1: A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

Recommended corrective action: The factory shall ensure that the main entry gate that has been identified as emergency exit gate shall comply with the regulations.

3. Description of non-compliance: The internal emergency exit route through stairs inside the building are not marked and secondary sourced lightning unit is not available.

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 72, (8) Battery operated lights should be placed along the evacuation stairs of buildings positioned at 1st and 2nd degree earthquake risk zones

This violated SMETA Measurement Criteria 6.0, Article 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

tour

Please look at photo report number 18

Objective evidence observed-3:

Observed through site tour

Please look at photo report number 16

practicable, the causes of hazards inherent in the working environment.

Recommended corrective action: It is recommended that battery operated lights should be provided above all emergency exit routes, and emergency exit routes shall be marked.

4. Description of non-compliance: The production sections in each floor have emergency exit gates that are sliding glass doors, which does not comply with the local law.

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."

This violated SMETA Measurement Criteria 6.0, Article 3.1: A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

Recommended corrective action: The firm shall ensure that emergency exit gates are in compliance with the regulations.

5. Description of non-compliance: The medical room in the building is not available for use.

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

Objective evidence observed-4:

Observed through site tour

Please look at photo report number 17

Objective evidence observed-5:

Observed through site

<p>Local law and/or ETI requirement: "In accordance with regulation based on Occupational Health and safety services (29.12.2012); Art 10 – (2) Below conditions should exist at common health and safety unit which is founded by the employer ; b ; There should be a room for the OHS expert and a medical treatment room for the jobsite doctor which both are not less then eight square meters and a first aid / emergency service unit which is not under 12 square meters. There should be separate rooms which have the same conditions for full-time jobsite doctors and full time OHS experts</p> <p>In accordance with regulation based on Occupational Health and Safety Services (29.12.2012); Art-11 (2) Employer, where more than 50 workers present in the company a) Provides totally 2 rooms to jobsite doctor and allied health personel and OHS expert no fewer that 8 square meters</p> <p>This violated SMETA Measurement Criteria 6.0, Article 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>Recommended corrective action: The firm shall ensure that necessary arrangements regarding the preparation of medical room shall be concluded in accordance with the regulations.</p>	<p>tour and management declaration</p>
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<p style="text-align: center;">Observation: 1</p>	
<p>Description of observation: During the audit date, fire alarm maintenances and instalments were being under check. The auditor monitored and recorded that fire alarm is active (in the third floor) but the alarm system was not fully ready by the time of the audit.</p> <p>Local law or ETI requirement: N/A</p> <p>Recommended corrective action: The firm shall ensure that fire alarm maintenance and instalments check shall be finalized and alarm system is fully ready in the building.</p>	<p>Objective evidence observed:</p> <p>Observed through site tour and management declaration</p>

<p style="text-align: center;">Good Examples observed: None</p>	
<p>Description of Good Example (GE): None</p>	<p>Objective Evidence Observed: None</p>

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: In order to ensure that no child worker is employed at the site, the firm verifies ages of the workers by checking the official documents of the employees. These documents are copied and kept in HR Personnel files. During the audit, the auditor verified 10 workers personnel files by reviewing the ages of the workers, through firm employee list, HR files, contracts and health reports. According to the age documentation of the employees, no child labour was found. The youngest worker's name is F.S., was born on 02.08.2002 and started working in the firm on 25.04.2019., and he was 16 when started working with the firm.

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

Details: It was verified through document review (Personnel list, HR Files, contracts and health reports), worker interviews and management declaration.

Any other comments: N/A

A: Legal age of employment:	Completed 15
B: Age of youngest worker found:	16
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)	1 %
E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details

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

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

Good Examples observed: None	
<p>Description of Good Example (GE): None</p>	<p>Objective Evidence Observed: None</p>

5: Living Wages are Paid

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

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

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: During this audit, 10 payroll records of 3 different months, 30 payroll records in total (March 2019-latest paid, January 2019 and October 2018) were sampled to evaluate the wages and compensation status of the factory. A review of pay records yielded that the legal minimum wage was granted for all workers. According to provided records, monthly wages were paid in monthly rate latest on the 10th of each month through bank transfer.

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

Details: Time records and payroll review, document review (Leaves, insurance premiums, pay slips, taxes), worker interviews and management declaration.

Any other comments: N/A

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: N/A

Recommended corrective action: None

Objective evidence observed: None

Observation: 1	
<p>Description of observation: Because of the fact that the time keeping mechanism (finger scanner/electronic card reader) is not ready in the new building, employees are keeping and signing timesheets manually. Therefore, in the month March, no certain information regarding timekeeping can be concluded.</p> <p>Local law or ETI requirement: N/A</p> <p>Comments: The factory shall start using the electronic time keeping mechanism for better and reliable records.</p>	<p>Objective evidence observed: Verified through site tour and management declaration</p>

Good Examples observed: None	
<p>Description of Good Example (GE): Free lunch and transportation is provided to the employees.</p>	<p>Objective Evidence Observed: Verified through site tour, worker interviews and management declaration</p>

Summary Information

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
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>	Legal maximum: 45 hours per week for adults 40 hours for the workers between 15 – 18 years old.	45 hours per week for adults 40 hours for the workers between 15 – 18 years old.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal maximum: 270 hours per year, 11 hours per day	3 hours per day 10 hours 30 minutes per week 24 hours 45 minutes per month	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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>	Legal minimum: 2.558,40 TL/Month (Gross), 2020,90 TL (Net) Since January 2019	Legal minimum: 2.558,40 TL/Month (Gross), 2020,90 TL (Net) Since January 2019	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<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. 200% for holiday work and national-religious holidays</p>	<p>150% of hourly wage for each working practice duration over 45 hours/week. 200% for holiday work and national-religious holidays</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
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Wages analysis:
[\(Click here to return to Key Information\)](#)

<p>A: Were accurate records shown at the first request?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>If No, why not?</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>During this initial visit, 10 payroll records of 3 different months totally 30 payroll records reviewed – 10 records from March 2019, 10 records from January 2019, 10 records from October 2018 to evaluate the wages and compensation status of the factory.</p>	
<p>C: Are there different legal minimum wage grades? If Yes, please specify all.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>If Yes, 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 No, 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: <i>Note: full time employees and please state hour / week / month etc.</i> 2.558,40 TL/Month (Gross) 2020,90 TL / Month (Net)</p>
<p>F: Please indicate the breakdown of workforce per earnings:</p>	<p>Because that the firm massively employed new workers, January was taken as reference.</p>	<p>___% of workforce earning under min wage _8_% of workforce earning min wage _92 % of workforce earning above min wage</p>
<p>F: Bonus scheme found: Please specify details:</p>	<p>Bonus Scheme found: <i>Note: full time employees and please state hour / week / month etc.</i></p>	

	N/A		
H: What deductions are required by law e.g. social insurance? Please state all types:	Social insurance deduction, income tax, stamp tax and unemployment benefit for insured workers		
I: Have these deductions been made? Please list all deductions that have/have not been made.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Please list all deductions that have been made.	1. Social Insurance 2. Income Tax 3. Stamp Tax 4. Unemployment Benefit Please describe: Legal deductions are made.
		Please list all deductions that have not been made.	1. 2. Please describe: N/A
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:		
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:		
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please specify amount/time:		
If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details:		
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is no periodic review of wages.		

<p>O: Are workers paid in a timely manner in line with local law?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>P: Is there evidence that equal rates are being paid for equal work:</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: It was verified through worker interviews, document review and management declaration</p>
<p>Q: How are workers paid:</p>	<p><input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other If other, please explain: It was verified through worker interviews, document review and management declaration</p>

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: During the audit, it was found out that the working hours for the employees vary. Management and production staff (except knitting and garment) work between: Monday to Friday, 08.45 to 18.30, with 2 15 minutes tea break at 10.00 to 10.15 and 16.00-16.15 along with 1 hour meal break between 12.30-13.30. Saturday is a half day work, from 08.45 to 12.30. Garment Workers work between 08.30 to 18.30, with 2 tea breaks for 15 minutes at 10.00 and 16.00 along with 30 minutes meal break at 13.00. Garment workers do not work on Saturday. For knitting section, there are 3 shifts; 07.00-15.00, 15.00-23.00 and 23.00-07.00 with 30 minutes of meal-rest break. Overtime is voluntary for all workers and compensated at premium.

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

Details: Verified through worker interviews, management declaration, worker representative interview and document review.

Any other comments: N/A

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

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

Good Examples observed: None	
<p>Description of Good Example (GE): None</p>	<p>Objective Evidence Observed: None</p>

Working hours' analysis <i>Please include time e.g. hour/week/month</i> (Go back to Key information)	
Systems & Processes	
<p>A. What timekeeping systems are used: time card etc.</p>	<p><i>Describe:</i> After moving into the new building in April 2019, the firm has been using manual hand signature for attendances until the electronic system will be available for use.</p>
<p>B: Is sample size same as in wages section?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <i>If no, please give details</i></p>
<p>C: Are standard/contracted working hours defined in all</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><i>If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:</i></p>

contracts/employment agreements?		
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<i>If YES, please complete as appropriate:</i>
		<input type="checkbox"/> 0 hrs <input type="checkbox"/> Part time <input type="checkbox"/> Variable hrs <input type="checkbox"/> Other
		<i>If "Other", Please define:</i>
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	<i>If yes, please detail hours, %, types of workers affected and frequency</i> Please give details: N/A
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
	<i>Maximum number of days worked without a day off (in sample):</i>	
	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	<i>If yes, % of workers & frequency:</i>
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<i>If yes, please give details:</i>
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours:	3 hours per day in March 2019 10 hours 30 minutes per week in March 2019 24 hours 45 minutes per month in March 2019

<p>J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	
<p>K: Approximate percentage of total workers on highest overtime hours:</p>	<p>__50__%</p>	
<p>L: Is overtime voluntary?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information</p>	<p><i>Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements:</i></p> <p>It was verified through worker interviews, employment agreement and management declaration</p>
<p>Overtime Premiums</p>		
<p>M: Are the correct legal overtime premiums paid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium</p>	<p><i>Please give details of normal day overtime premium as a % of standard wages:</i></p> <p>150% of hourly rate times how many hours in a day worked.</p>
<p>N: Is overtime paid at a premium?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><i>If yes, please describe % of workers & frequency:</i> Overtime is paid at premium for all workers.</p>
<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 checked="" 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>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"/> Overtime is voluntary <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>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 type="checkbox"/> Yes <input checked="" 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. It was verified through worker interviews that there is no discrimination practised.

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

Details: It was verified through document review, management declaration and employment interviews.

Any other comments: N/A

A: Gender breakdown of Management + Supervisors (Include as one combined group)	Male: <u>57</u> % Female <u>43</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:	#: 12
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?	OHS Trainings, Orientation, First Aid trainings, Fire Safety Trainings
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<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:</p>
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Non-compliance: None	
<p>1.Description of non-compliance: None</p> <p><input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement: N/A</p> <p>Recommended corrective action: None</p>	<p>Objective evidence observed: None</p>

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

Good Examples observed: None	
<p>Description of Good Example (GE): None</p>	<p>Objective Evidence Observed: None</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: The HR Department is responsible for the hiring process. There are no fees paid by workers during the recruitment process. There are effective management systems to ensure that employees are legally eligible for work. All employees are insured by national insurance system.

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

Details: Personnel files and signed labour contracts were checked. It was verified through management declaration and worker interviews.

Any other comments: N/A

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

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

Good Examples observed: None	
<p>Description of Good Example (GE): None</p>	<p>Objective Evidence Observed: None</p>

Responsible Recruitment

All Workers	
<p>A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?</p>	<p><input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions</p> <p>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>

<p>C: If yes, check all that apply:</p>	<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
<p>D: If any checked, give details:</p>	

Migrant Workers: <i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national 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>			
<p>A: Type of work undertaken by migrant workers:</p>	<p>There are no migrant workers on-board.</p>		
<p>B: Migrant worker recruitment</p>	<p>Total number of (in country recruitment agencies) used: Total number of (outside of local country) recruitment agencies used</p>		
<p>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?</p>	<table border="1" style="width: 100%;"> <tr> <td style="width: 60%;"> <input type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding: </td> <td style="width: 40%;"> Observations </td> </tr> </table>	<input type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding:	Observations
<input type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding:	Observations		
<p>D: Are any migrant workers in skilled, technical, or management roles</p> <p><i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes number and example of roles:		

NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	<input type="checkbox"/> Yes <input 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:	

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

8A: Sub-Contracting and Homeworking:

8A: Sub-Contracting and Homeworking

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

8A.1 There should be no sub-contracting unless previously agreed with the main client.
 8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.
Note to auditor on homeworking:
 Report on whether it is direct or via agents. How many workers, relationship with site and what control systems are in place.
Note to auditor on subcontracting: auditor should use this section for subcontractors of part made or wholly made finished goods, this section should not be used for raw material manufacturers unless instructed otherwise by customers

Current Systems and Evidence Examined

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

Current systems: The firm has been working with 11 sub-contractors. These sub-contractors constitute %50 percent of the whole production of the firm. However, there are no systems in place to monitor site's own suppliers against social standards, as stated as a Non-Compliance in the Management Systems section.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate): It was verified through document review and management declaration

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

Process Subcontracted	Knitting	Tricot
Name of factory	Duygu Triko Orme	Ak-Ay Triko Tekstil
Address	Bayrampasa, Istanbul	Gungoren, Istanbul

Process Subcontracted	Ironing Packaging	Tricot
Name of factory	Nehir Utu Paket	Taha Triko
Address	Merter, Istanbul	Bahcelievler, Istanbul

Process Subcontracted	Tricot	Tricot
Name of factory	ENS Tricot	Enerji Tricot
Address	Gungoren, Istanbul	Gungoren, Istanbul

Details: N/A

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

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

Good Examples observed: None	
<p>Description of Good Example (GE): None</p>	<p>Objective Evidence Observed: None</p>

Summary of sub-contracting – if applicable	
<input type="checkbox"/> Not Applicable please x	
<p>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</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: No unrecorded work identified.</p>
<p>B: If sub-contractors are used, is there evidence this has been agreed with the main client?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, summarise details: Although there is no certain agreement record, firm is known to be using sub-contractors.</p>
<p>C: Number of sub-contractors/agents used:</p>	<p>11</p>
<p>D: Is there a site policy on sub-contracting?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, summarise details:</p>
<p>E: What checks are in place to ensure no child labour is being used and work is safe?</p>	<p>No certain checks are in place.</p>

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 Yes , 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&S or any other grievances to a 3rd party?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is no channel available for reporting any violations to a third party.</p>
<p>B: If Yes, are workers aware of these channels and have access? Please give details.</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>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: Wish and complaint boxes, open door policy, 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</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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No If no, please give details: There is no such encouragement.</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 explain</p>

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

Current Systems and Evidence Examined

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

Current systems: The auditor concluded that, there is no evidence of physical abuse, sexual or any kind of harassment, verbal abuse or intimidation. During the worker interviews, it was concluded that disciplinary actions are in place and employees are well aware of the procedures. Also, no evidence of harsh or inhumane treatment observed/heard. It was concluded that grievance mechanism is available for employees through wish and complaint box, open door policy and worker representatives.

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

Details: It was verified through document review, worker interviews, worker representative interviews and management declaration.

Any other comments: N/A

Non-compliance: None

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

<p>Description of observation: None</p> <p>Local law or ETI requirement: N/A</p> <p>Comments: None</p>	<p>Objective evidence observed: None</p>
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Good Examples observed: None	
Description of Good Example (GE): None	Objective Evidence Observed: None

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: During this audit, 10 (ten) sampled workers employment files and contracts were reviewed and the terms and conditions were found as per law. All workers are local and there are no migrant workers. Employees are eligible for work, and the firm ensures that by checking the IDs of the employees prior to the employment. A copy of the ID is kept in HR personnel files, and national insurance starts on the date of employment.

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

Details: It was verified through document review, worker interviews, worker representative interview and management declaration.

Any other comments: N/A

Non-compliance: None

1. Description of non-compliance: None

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

Objective evidence observed: None

Local law and/or ETI /Additional Elements requirement: N/A

Recommended corrective action: None

Observation: None

Description of observation: None

Local law or ETI/Additional Elements requirement: N/A

Comments: None

Objective evidence observed: None

Good examples observed: None	
Description of Good Example (GE): None	Objective Evidence Observed: None

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: There are no processes that can harm the environment. The firm has Letter of EIA available (22.04.2019), and the Environment Letter is recently applied but pending.

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

Details: It was verified through document review and management declaration.

Any other comments: N/A

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: N/A

Recommended corrective action: None

Objective evidence observed: None

Observation: None

Description of observation: None

Local law or ETI/additional elements requirement: N/A

Comments: None

Objective evidence observed: None

Good examples observed: None	
Description of Good Example (GE): None	Objective Evidence Observed: None

Photo Form

<p>Main Building</p>	<p>Emergency Assembly Point</p>	<p>Fire Hose</p>
<p>First Aid Kit</p>	<p>Smoke Detector</p>	<p>Emergency Evacuation Plan</p>
<p>Drinking Water</p>	<p>Eye Bath and Fire Extinguisher</p>	<p>Toilet</p>

<p>Fire Alarm Button</p>	<p>Production Site</p>	<p>Production Site</p>
<p>Production Site</p>	<p>Compressor Section</p>	<p>Production Section</p>
<p>NC-5: The internal emergency exit route through stairs inside the building are not marked and secondary sourced lightening unit is not available.</p>	<p>NC-6: The production sections in each floor have emergency exit gates that are sliding glass doors, which does not comply with the local law.</p>	<p>NC-4: The main entry door, that has been identified as emergency exit gate is a shutter gate, does not open outwards which does not comply with the local regulations.</p>



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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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