



Sedex Members Ethical Trade Audit Report

Version 6.1



CAPR written by Blue colour_ Partial Follow up Audit conducted on 21 September 2021.

Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC408549982	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS408583571	
Business name (Company name):	BERGAMA STONE MINING IND TRADE CO LTD			
Site name:	BERGAMA STONE FACILITY			
Site address: <i>(Please include full address)</i>	CALIBAHCE MAHALLESİ CALIBAHCE SOKAK NO:63 BERGAMA - IZMİR	Country:	Turkey	
Site contact and job title:	MUSTAFA ALI GENC – ASSISTANT MANAGER/ Ekrem Uygul – Accounting Responsible			
Site phone:	+90 850 775 0458	Site e-mail:	ali@bergamastone.com	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar	<input checked="" type="checkbox"/> Business Ethics
Date of Audit:	21st September 2021 / /Full initial audit conducted on 8 th & 9 th March, 2021			

<p>Audit Company Name & Logo:</p> <p>GSCS International Ltd</p>	<p>Report Owner (payer): <i>(If paid for by the customer of the site please remove for Sedex upload)</i></p> <p>BERGAMA STONE MINING IND TRADE CO LTD</p>
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

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



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

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

Any exceptions to this must be recorded here (e.g. different sample size):

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

Lead auditor: Ferial Erdinc (RA21704612)/ [Rasim Sancakli \(RA 21705245\)](#)

Team auditor: Nil/ Nil

Interviewers: Ferial Erdinc (RA21704612)/ [Rasim Sancakli \(RA 21705245\)](#)

Report writer: Ferial Erdinc (RA21704612)/ [Rasim Sancakli \(RA 21705245\)](#)

Report reviewer:

Date of declaration: 09th March 2021/ [21.09.2021](#)

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

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

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i> <i>Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>		0	0	None Observed
0B Management systems and code implementation		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None Observed
1. Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None observed
2. Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None observed
3. Safety and Hygienic Conditions	<input checked="" type="checkbox"/> / <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> / <input checked="" type="checkbox"/>		<input type="checkbox"/>	1/6	0	0	<p>Summary of non-compliances:</p> <p>1) The facility has 5 first aiders whereas the requirement is 8 considering total manpower is 77. 1st Full Follow-up audit conducted on 21 September 2021. Issue found closed. Adequate number of first aiders are trained. 2 first aiders are available. Training conducted on 05-06.04.2021</p> <p>2) Buddy was not assigned for 2 disabled workers 1st Full Follow-up audit conducted on 21 September 2021.</p>

								<p>Issue found closed. Buddy were assigned for disabled employees. 3) Electronic grounding inspection conducted by the authorized inspection authority on 04.11.2020 but there were some non-conformities so the facility has not yet received the renewal inspection report. <u>1st Full Follow-up audit conducted on 21 September 2021. Issue is closed as per provided evidences.</u> Issue found closed. Electronic grounding inspection conducted by the authorized inspection authority. 4) Electrical installation check was conducted by the authorized inspection authority on 04.11.2020 but there were some non-conformities so the facility has not yet received the renewal inspection report. <u>1st Full Follow-up audit conducted on 21 September 2021.</u> Issue found closed. The electrical installation check was conducted by the authorized inspection authority 15.04.2021. 5) The air tanks check was conducted by the authorized inspection authority on 04.11.2020 but there were some non-conformities so the facility has not yet received the renewal inspection report. <u>1st Full Follow-up audit conducted on 21 September 2021.</u> Issue found closed. The air tanks check was conducted by the authorized inspection authority dated on 15.04.2021.</p>
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									<p>6) 01 out of 02 canteen workers, did not receive hygiene training. 1st Full Follow-up audit conducted on 21 September 2021. Issue found closed. Fatma Kalaba certificate issued on 28.08.2018 reviewed by audit team.</p> <p>Summary of non-compliances:</p> <p>1) It was noted through plant tour and workers interview found that 1 new started employee (2 days before) could not receive health and safety training.</p>
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None observed
5	<u>Living Wages and Benefits</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	1/1	0	1	<p>Summary of non-compliance:</p> <p>1)There are no in-out time recordings for attendance sheet. Supervisors filling the tick box of workers to verify their presence only. No hour/minute clock time written since April 2020. Therefore, wages, overtime compensation and benefits could not be fully verified. 1st Full Follow-up audit conducted on 21 September 2021. Issue is closed as per provided evidences. Issue found closed. There is in-out time recordings are available. That is verified by audit team.</p> <p>Summary of good example:</p> <p>1) Lunch and transport are provided free of charge.</p>
6	<u>Working Hours</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	1/1	0	0	<p>Summary of non-compliance:</p> <p>1)There are no in-out time recordings for attendance sheet. Supervisors filling the tick</p>



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										<p>box of workers to verify their presence only. No hour/minute clock time written since April 2020. Working hours could not be verified.</p> <p><u>1st Full Follow-up audit conducted on 21 September 2021.</u></p> <p>Issue found closed.</p> <p>The in-out time recordings are available. That is verified by audit team.</p>
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None observed	
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None observed	
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None observed	
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None observed	
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None observed	
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	Not applicable, as it is environment 4-pillar audit.	
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None observed	
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None observed	
General observations and summary of the site:										
The initial audit is performed by one auditor. The scope of this audit was based on -4Pillar SMETA systems.										

The company is established in April 2019 and operated since September 2019 at current location. Company produced granite stones and export only to Sweden to their parent Company (Stenbolaged AB Stockholm). Production area is 950 sqm closed space, 4050 sqm open space and is in total 22,578 sqm. All process is done in-house. Peak season is from April to September.

On the day of audit 75 employees were at the site. 70 production workers and 5 non-production workers. (70 male & 5 female) / in this follow up audit, on the day of audit, there were 78 employees were at the site. 72 production workers and 6 non-production workers. (72 male & 6 female). All workers were local. Working days are from Monday to Saturday. Sunday is off day. Operation is operated only in cutting section in 2 shifts. First shift from 08:00 – 16:30 and second shift from 16:00 – 00:30 with 60 mins break time in total. All other sections are operated in one shift from 08:00 – 16:00. Employees were interviewed from both shifts.

Auditor entered to facility at 10:15 and held opening meeting with Mr. M. Ali Genc (Assistant General Manager), Mr. Ozan Yıldız (Production Manager) Ms. Gülcesu Adagideli (HR Responsible), Ms. Fulyagül Onal (Account Responsible), Mr. Ömer Aykul (H&S Specialist), Ms. Kübra Canoğlu (Environmental specialist) and worker representative. /In this follow up audit, Auditor entered to facility at 08:00 and held opening meeting with Mr. Ekrem Uygul – Accounting Responsible

Overall, the Management has a positive approach to Social Compliance issues. The audit findings were embraced, and the management has immediately acted on specially H&S issues. Company was transparent and cooperative during the audit All workers were content with the job, Workers highly praised their stress-free family like working environment. No specific complaint was raised during worker interviews.

Negative Findings:

All of 8 findings accepted by company and given time frames. Photos of evidence taken and added to report. One of them was on "Working hours "one of them was on "Wages and Benefits" and 6 on "Safety and Hygienic Conditions". /During follow up audit all the previous findings have been closed. and in this follow up audit one non-compliance raised in the area of "Safety and Hygienic Conditions".

Good Example:

Lunch meal and service transportation provided free of charge.

The closing meeting started on 12:30 and corrective plan discussed. A copy of CAP was left to Mr. M.Ali Genc /Assistant General Manager. Auditor thanked for good cooperation and friendly working environment and left the company at 13:15 on 9th March,2021. /The closing meeting started on 16:15 and corrective plan discussed. A copy of CAP was left to Mr. Ekrem Uygul – Accounting Responsible. Auditor thanked for good cooperation and friendly working environment and left the company at 17:00 on 21st September,2021.



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**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:	BERGAMA STONE MINING IND TRADE CO LTD										
B: Site name:	BERGAMA STONE FACILITY										
C: GPS location: (If available)	GPS Address: CALIBAHCE MAHALLESİ CALIBAHCE SOKAK NO:63 BERGAMA - IZMIR	Latitude: 39.02036 Longitude: 2711182									
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Business license: 16.05.2011 Company operating permit received from Chamber of Commerce: 25.04.2019 Register no: 9442 Compulsory corporal insurance for hazardous waste dated 18.10.2020										
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Cutting, shaping and finishing of granite stones and marble										
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>It is a steel construction building built in 2011 and is owned by the factory owner since April 2019 and operated since September 2019 at current location. Factory is located in Bergama city which is app. 110 km far away from Izmir city. There is no visual sign of structural deterioration.</p> <p>The facility consists of 1 flat building and has 950 sqm closed production space, 4050 sqm open space and is in total 22.578 sqm. There are additionally 4 prefabricate buildings each 1 flat used as doctor room, lunch hall, admin offices, meeting room, locker room and toilets. Here given below building description-</p> <table border="1"> <thead> <tr> <th>Production Building no-1</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Floor 1</td> <td>Production & Social facilities</td> <td>Nil</td> </tr> <tr> <td>Is this a shared building?</td> <td>Nil</td> <td>Nil</td> </tr> </tbody> </table> <p>F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: No large crack found during the audit.</p> <p>F3: Does the site have a structural engineer evaluation? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>		Production Building no-1	Description	Remark, if any	Floor 1	Production & Social facilities	Nil	Is this a shared building?	Nil	Nil
Production Building no-1	Description	Remark, if any									
Floor 1	Production & Social facilities	Nil									
Is this a shared building?	Nil	Nil									



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	F4: Please give details: Dated 18.09.2019Nr:86295008-000-E.3178/7866
G: Site function:	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor
H: Month(s) of peak season: (if applicable)	From April to September
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	<p>Cutting and shaping of granite stones and marble are carried out with the below listed machinery,</p> <p>5 Block cutter, 2 Sizing machines, 1 Bridge cutter, 1 Beweling machine, 2 Cube stone machines, 1 sandblasting machine.</p>
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 representative system <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 L1: 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 M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: If no, please give details N/A



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Audit Parameters			
A: Time in and time out	Day 1 Time in: 10:15 /08:00 Day 1 Time out: 18:15/ 17:00	Day 2 Time in 08:15 Day 2 Time out 13:15	Day 3 Time in: NA Day 3 Time out: NA
B: Number of auditor days used:	1.5Manday (1 auditor used for 1.5 days)/ 1 Manday (1 auditor used for 1day)/		
C: Audit type:	<input type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input checked="" type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define:		
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 4 weeks window period started from February 19, 2021 to March 19, 2021 / 4 weeks window period started from September 01, 2021 to September 30, 2021 <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mustafa Ali Genc – Assistant Manager / Ekrem Uygul – Accounting Responsible		
H: Is further information available (if yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	N/A		
J: Previous audit type:	N/A		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" 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



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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>	Not applicable, workers representatives were present.		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	N/A- Union is not mandatory according to local law.		



Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	70/ 72	0/ 0	0/ 0	0/ 0	0/ 0	0/ 0	0/ 0	70/ 72
Worker numbers – female	5/ 6	0/ 0	0/ 0	0/ 0	0/ 0	0/ 0	0/ 0	5/ 6
Total	75/ 78	0/ 0	0/ 0	0/ 0	0/ 0	0/ 0	0/ 0	75/ 78
Number of Workers interviewed – male	8/ 8	0/ 0	0/ 0	0/ 0	0/ 0	0/ 0	0/ 0	8/ 8
Number of Workers interviewed – female	2/ 2	0/ 0	0/ 0	0/ 0	0/ 0	0/ 0	0/ 0	2/ 2
Total – interviewed sample size	10/ 10	0/ 0	0/ 0	0/ 0	0/ 0	0/ 0	0/ 0	10/ 10



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A: Nationality of Management	Turkish	
<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first.</p> <p><i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities:</p> <p>B1: Nationality 1: Turkish_____</p> <p>B2: Nationality 2: ___0___</p> <p>B3: Nationality 3: ___0___</p>	<p>Was the list completed during peak season?</p> <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods:</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx % total workforce: Nationality 1 _100% Turkish</p> <p>C1: approx % total workforce: Nationality 2 ___0___</p> <p>C2: approx % total workforce: Nationality 3 ___0___</p>	
D: Worker remuneration <i>(management information)</i>	<p>D: ___0___% workers on piece rate</p> <p>D1: ___0___% hourly paid workers</p> <p>D2: 100 % salaried workers</p> <p>Payment cycle:</p> <p>D3: ___0___% daily paid</p> <p>D4: ___0___% weekly paid</p> <p>D5: 100 % monthly paid</p> <p>D6: ___0___% other</p> <p>D7: If other, please give details</p>	



Worker Interview Summary		
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	1 group of 2 employees were conducted due to the risks of Covid-19. /1 group of 2 employees were conducted due to the risks of Covid-19.	
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 7/7	D1: Male: 7/7
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?	Food was a common complain previously however it was solved long time ago.	
I: What did the workers like the most about working at this site?	On time payment, working environment, attitude of management.	
J: Any additional comment(s) regarding interviews:	None	
K: Attitude of workers to hours worked:	Favourable	
L. Is there any worker survey information available?		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details: Not Applicable		
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>		



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Confidential interviews were conducted without the presence of factory management in a private room. All workers interviewed were relaxed and talkative. There was no sign of coaching or pressure. There was no impression of harsh treatment or discrimination. They were happy to work in the facility as they were being declared to Social Insurance by their real remunerations and OT work. They also mentioned that wage payments were never being late and they were happy about the on time payments.

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

Worker representatives were freely elected by employees on 07.01.2021. Worker representative is favourable to the facility and no complaint is noted. Workers advised that they can easily speak also with supervisors, HR responsible and Managers.

O: Attitude of managers:

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

The Management was positive and gave full access to all kind of documents and areas. Everything was provided on time. All raised issues were discussed and agreed on, in the closing meeting.



Audit Results by Clause

0A: Universal Rights covering UNGP

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

0.A. Guidance for Observations

0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.

0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights

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

0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.

0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.

0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.

Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

Current Systems and Evidence Examined

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

Current systems:

- The facility had a policy, endorsed at the highest level, covering human rights impacts and issues, and it is communicated to all appropriate parties, including its own suppliers.
- The responsible person for implementation and monitoring is Ms. Gülcesu Adagideli – HR
- The facility measured their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.
- Where businesses have an adverse impact on human rights within any of their stakeholders, they address these issues and enable effective remediation.
- The facility had a transparent system in place for confidentially reporting and dealing with human rights impacts without fear of reprisals towards the report.
- The facility has policy and procedures for human rights.
- It is communicated to all appropriate parties, including suppliers through the responsible person.

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

Details:

1. Documentation files were reviewed. It stipulates complying with Human Rights, written policies and procedure that being provided individually to employees.
2. Letter of Authorization on implementing Human Rights.
3. Impact for Human Rights assessment report.
4. Management interview and employee interview

Any other comments: None

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<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: The facility had posted the policy about respecting Human Rights in the policy board stated that Child labour shall not be used, Forced Labour shall not be used, no discrimination is practised, no harsh or inhumane treatment is allowed, disciplinary action taken, working hours etc.</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Ms. Gülcesu Adagideli Job title: HR</p>
<p>C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: It's defined in Business Ethics and Values Code and it's implemented</p>
<p>D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details</p>
<p>E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Personal Data Protection Law practices implemented and this document signed by workers as well.</p>

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

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

Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 3 %	A2: This year 2%/2%
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	2%/2%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 9.6 %	C2: This year 1.33 %/1%
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	1.33%/1%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Company has injury logbook followed and recorded by HR Responsible	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: Number: 6	F2: This year: Number: 0/0
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	0/0	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 8.3 %	H2: This year: 0/0%
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 0/0 % workers	I2: 12 months 0/0 % workers

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J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months 0/0 % workers	J2: 12 months 0/0 % workers
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0B: Management system and Code Implementation

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

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

Current Systems and Evidence Examined

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

Current systems:

- Responsibility for meeting the legal and client code requirements is taken by Mustafa Ali Genc – Assistant Manager /[Mr. Ekrem Uygul – Accounting Responsible](#).
- The facility communicates this code of conduct (COC) to the employees through notice board and orientation training.
- The facility management is conducting internal social compliance audit regularly and take necessary corrective action based on report.
- The facility arranged mid-level management training for all mid-level management employees such as supervisors, quality in charge, production officers, etc.
- The facility conducts orientation training for all new employees.
- Facility arranged the training on ETI code of conduct & workers are aware of the ETI code of conduct.
- Implementation of any necessary changes is then given to the individual department heads after agreement with the facility manager.

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

Details:

- Employee handbook.
- Facility Code of Conduct (COC).
- All policies of facility.
- Legal license (Factory, Fire, Trade)
- Internal audit records.
- Management employee training, training attendance record
- Meeting records.

Any other comments: None

Management Systems:	
A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: Please give details: In the last 12 months the site has not been subjected to any fines or prosecutions for non-compliance to any regulations.
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Company policy documents regarding below were seen and discussed with the management -Voluntary recruitment -Discrimination -Harassment & abuse -Child labour
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Training records shows that workers are aware of social compliance articles and their rights. Workers received training which was on 11.09.2020. New hired workers received also training in the same months.
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Training records are recorded and reviewed which was confirmed by workers.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Orientation training attendance forms in the personnel files.
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: ISO 9001:2015 (dated 20.11.2020), ISO 14001:2015, ISO 45001:2018, ISO 2600. Certificates issue dates 20.11.2020
G: Is there a Human Resources manager/department? If Yes, please detail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: There is a team of 2 including HR Responsible Ms. Gülcesu Adagideli
H: Is there a senior person / manager responsible for implementation of the code	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Ms. Gülcesu Adagideli is designated person for implementation of code.
I: Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

	I1: Please give details: The factory had adopted a policy decision where by all employees of the company will be required to maintain confidentiality with regard to the affairs of the company & it's greater.
J: Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Access is restricted to HR office. Management is also aware of the recently adapted law on protecting personal data.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: H&S consultant led the formation of the risk assessment committee and the risks are addressed as they arise per the risk assessment report.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1 Please give details: The facility performs a corrective action plan for the findings that addressed on risk assessment.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: It's defined in company's procedure on supplier ethics. They have a control and verification system for their suppliers
Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Landlord obtained land right license from government on 18.09.2019
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: All legal permits are obtained, and legal obligations are being followed per the documents presented
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No P1: If yes, how does the company obtain FPIC:

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<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 Q1: Please give details: Company own the building required documents were reviewed.</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 R1: Please give details: Not required by local law</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 S1: Please give details: All the areas of factory were legal according to the interview and document review.</p>

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

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

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

1: Freely Chosen Employment

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- The factory has a policy which prohibits forced labour and this was also available for review.
- Age verification documents (National ID card copy, educational certificate, nationality certificates) were available in employee personal files.
- Overtime is voluntary.
- The terms and conditions of employment state that the workers are free to leave the workplace outside of their working hours. Facility also has a written policy regarding this.
- The facility did not require any payment for work tools, PPE, IC/staff card, training, etc.
- The facility does not use any prison labour.
- The above was confirmed in management and employees' interviews.

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

Details:

1. Personnel files
2. Factory policy, rules and regulations, and training records etc.
3. Resignation records
4. Factory rules
5. Management and worker interview

Any other comments: None

<p>A: Is there any evidence of retention of original documents, e.g. passports/ID's</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, please give details and category of workers affected:</p>
<p>B: Is there any evidence of a loan scheme in operation</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please give details and category of worker affected:</p>
<p>C: Is there any evidence of retention of wages /deposits</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of worker affected:</p>

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<p>D: Are there any restrictions on workers' freedom to terminate employment?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding: Facility has a policy mentioning workers are free to terminate employment from the facility</p>
<p>E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding: Not applicable as the yearly turnover of the factory was less than £36m.</p>
<p>F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding: No evidence of any restrictions on workers freedoms to leave the site at the end of the workday.</p>
<p>G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected: The facility established a policy about forbidden of forced / trafficked / bonded labour and implemented strict management system to control the risk of forced / trafficked / bonded labour in its supply chain. The facility sent agreement of commitment to its suppliers, and operated social responsibility audit on suppliers to control the risk of forced / trafficked / bonded labour in its supply chain.</p>
<p>H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: Factory had provided training and awareness session to all employees to reduce the risk of forced / trafficked labour.</p>

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

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

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Comments: Not Applicable	
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Good Examples observed:	
Description of Good Example (GE): None Observed	Objective evidence observed: Not Applicable

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

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- There is no Trade Union in the facility. There is worker representative and suggestion box system at the facility. Grievance procedure announced to workers.
- Boxes located at common areas. Suggestion box contents are checked by worker representative and the management.
- Written contents of suggestion box could not be seen, however open -door policy is practised. Worker representatives were elected by workers on 07.01.2021. Workers are aware of representative.

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

Details:

1. Freedom of association policy review
2. Facility management interviews
3. Worker interview
4. Complain box register (Suggestions from the complaint box and actions taken)
5. worker representative formation record review and its meeting records review, Grievance handling policy & procedure.

Any other comments: None

A: What form of worker representation/union is there on site?

- Union (name)
- Worker Committee
- Other (specify) : Worker representative system
- None



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B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
C: Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
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 D1: Please give details: Worker representative system and suggestion boxes. Additionally, open-door policy is in practise and employees can communicate with supervisors. D2: 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 E1: Please give details: There is no union or committee, however worker representatives are amongst the workers at the production floors. They can be accessed by the colleagues at all times.	
F: Name of union and union representative, if applicable:	N/A	F1: 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 representative system	G1: 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	Workers are aware of their workers representative.
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: 07.01.2021
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: Two worker representatives were interviewed during audit.	
L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Topics of worker representatives discussed with management verbally. Last meeting was held with management on 12.02.2021.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

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If Yes , what percentage by trade Union/worker representation	M1: <u> 0 </u> % workers covered by Union CBA	M2: <u> 0 </u> % workers covered by worker rep CBA
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

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

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

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

3: Working Conditions are Safe and Hygienic

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- Company has agreement with outsourced H&S expert for taking care of H&S topics and issues. He is responsible for trainings too.
- Emergency exit doors opening outwards of two different directions of the building. Emergency routes are clean. There were no blocked fire exit doors. Tested emergency lightings were function.
- Workers were their PPE's while working as observed during the tour.
- Evacuation plans, working hours and first aid boxes were placed in production area. Toilet facilities, canteen was provided and clean. Lunch is provided by a catering firm.

[/1st Full Follow-up audit conducted on 21st September 2021 that six \(6\) non compliances found closed and one \(1\) new noncompliance was raised. For details, please refer to the contents of Non-compliance.](#)

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

Details:

Reviewed documents:

- ✓ Business license :16.12.2019 Number 190
- ✓ Land right license 18.09.2019
- ✓ Fire brigade report: 23.09.2019
- ✓ Risk analysis: 12.01.2020 & coronavirus pandemic risks: 18.03.2020
- ✓ Emergency plan: 12.01.2020 & coronavirus pandemic risks:18.03.2020
- ✓ Periodic fire safety equipment check: 12.06.2020 [/Periodic fire safety equipment check: 28.05.2021](#)
- ✓ Fire drill: 12.06.2020 [/ Fire drill: 02.06.2021](#)
- ✓ Fire training: 12.06.2020 [/ Fire training:30.05.2021](#)
- ✓ Health and safety training for all workers. 26-27.07 / 02.11.2020 7 25-26.11.2020 Last 04.03.2021 included Covid-19 training [/In this Follow-up audit, it was noted that 1 new started employee \(2 days before\) could not receive health and safety training.](#)
- ✓ Health check for all workers [/In this Follow-up audit, it was seen that Health check for all workers.](#)

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<ul style="list-style-type: none"> ✓ First aider certificates 5 valid NC (There are 3 missing) /In this Follow-up audit, it was seen that missing First aider certificates. Adequate number of first aiders are trained. 2 first aiders are available. Training conducted on 05-06.04.2021. ✓ Electrical grounding: 04.11.2020 NC was raised /Electrical grounding: 15.04.2021 NC was closed. Electronic grounding inspection conducted by the authorized inspection authority. ✓ Internal electrical installation report 04.11.2020 NC was raised ✓ Indoor measurements 04.11.2020 ✓ Air compressor: 04.11.2020 ✓ Air tank: 04.11.2020 NC was raised / Air tank: 15.04.2021 NC was closed. The air tanks check was conducted by the authorized inspection authority. ✓ Hoist: 04.10.2020 ✓ Drinking water analysis: 16.06.2020/ 08.09.2021 ✓ Annually leave records ✓ Hygiene training certificate 1 NC (There is 1 missing) /In this Follow-up audit, it was seen that Hygiene training certificate issued on 28.08.2018. ✓ Agreement of doctor: 13.04.2020 ✓ Agreement of H&S Specialist: 13.04.2020 ✓ Occupational accident records are regularly kept. ✓ H&S committee meeting records, each 2 months period: last meeting on 12.02.2021 / last meeting on 08.09.2021 ✓ Environmental report: 12.09.2016 ✓ CED: 20.02.2021 ✓ Suggestion box opening period in a monthly period <p>Body system for disabled workers is not available /Buddy were assigned for disabled employees.</p> <p>Any other comments: None</p>
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<p>A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Workers trained on H&S procedures during OHS trainings</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Worker manuals include details on policies.</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: Land right license from government obtained on 18.09.2019</p>
<p>D: Are visitors to the site informed on H&S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Visitors are provided with personal protective equipment and also informed verbally about H&S rules.</p>
<p>E: Is a medical room or medical facility provided for workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

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<p>If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p>E1: Please give details: Medical room available. No applicable legal requirement related to number of rooms.</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: The contracted doctor visits the factory every Tuesday for two hours and is covering both shifts.</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 F1: Please give details: The contracted doctor visits the factory every Tuesday for two hours and is covering both shifts.</p>
<p>H: Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: The facility is provided proper and safe transportation to employees. All transportation vehicles have insurance and all drivers has professional competence certificate (SRC).</p>
<p>I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Proper locker rooms provided to workers.</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 J1: Please give details: The facility has environmental permit dated 20.02.2021</p>
<p>K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No K1: Please give details: No chemicals used during production process at this facility.</p>

Non-compliance:

1. Description of non-compliance:

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

It is noted through during floor visit and workers and management interview that the facility has 5 first aiders whereas the requirement is 8 considering total manpower is 77. (77 çalışan için 5 ilk yardımcı mevcut, en az 3 kişi daha gereklidir)

Local law and/or ETI requirement

In accordance with ETI base code 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

Objective evidence observed:

1. Based on document review

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

In accordance with Turkish Law:

First Aid Regulation 29/7/2015 No: 29429 - ARTICLE 19: In every firm and establishment must employ one first aid trained employee depending to dangerous class for firm/establishments a) 1 first aider for each 20 employees-less dangerous class; b) 1 first aider for each 15 employees -dangerous class; c) 1 first aider for each 10 workers- high dangerous class.

Recommended corrective action:

It is recommended that management shall ensure there is 1 first aider for each 10 workers. (Her 10 çalışan için 1 ilkyardımcı olduğundan emin olunuz.)

1st Full Follow-up audit conducted on 21 September 2021:

Issue found closed.

Adequate number of first aiders are trained. 2 first aiders are available. Training conducted on 05-06.04.2021.

2. Description of non-compliance:

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

It is noted through during plant tour that buddy was not assigned for 2 disabled workers. (2 Engelli çalışan için refakatçi ataması yapılmamıştır)

Local law and/or ETI requirement:

In accordance with ETI base code 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.

In accordance with Turkish Law:

Regulation about emergency situations at workplaces Art 4/10. Buddy is assigned for disabled workers.

Recommended corrective action:

It is recommended that management shall ensure a designate team assist with the emergency evacuation of disabled workers in emergency cases. (Engelli çalışanların acil durumlarda tahliyesine yardımcı olacak çalışanlar belirlediğinizden emin olunuz).

1st Full Follow-up audit conducted on 21 September 2021:

Issue found closed.

Buddy were assigned for disabled employees.

3. Description of non-compliance:

1.Based on document review, management and worker's interview

2.Based on workers interview and management interview. Photo evidence

2.Based on document review, management and worker's interview

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

During the document review and management interview it was noted that electronic grounding inspection conducted by the authorized inspection authority on 04.11.2020 but there were some non-conformities so the facility has not yet received the renewal inspection report.(04.11.2020 tarihli topraklama fenni muayene raporlarında. uygunsuzluklar mevcut)

Local law and/or ETI requirement:

In accordance with ETI base code 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.

In accordance with Turkish Law:

Use of Work Equipment Regulations Health and Safety Requirements Appendix 3 / Art 2.1.4 / Art 2.2.3 /Art 2.3.4 Annually checks according to list 1: Steam generator, heat generator, LPG tubes, Air tanks, compressors, Forklifts, Lifts, Vinch, electrical grounding, fire equipment, fire hoses, hydrophores, pipe infrastructure, air ventilation, air condition equipment.

Recommended corrective action:

It is recommended that management shall ensure non-conformities corrected and updated grounding inspection report. (Fenni muayene raporlarındaki uygunsuzlukların giderildiğinden ve raporun güncellendiğinden emin olunuz.)

1st Full Follow-up audit conducted on 21 September 2021:

Issue found closed.

Electronic grounding inspection conducted by the authorized inspection authority dated on 15.04.2021.

4. Description of non-compliance:

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

During the document review and management interview it was noted that the electrical installation check was conducted by the authorized inspection authority on 04.11.2020 but there were some non-conformities so the facility has not yet received the renewal inspection report. (04.11.2020 tarihli iç elektrik tesisat fenni muayene raporlarında. uygunsuzluklar mevcut)

Local law and/or ETI requirement:

In accordance with ETI base code 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.

In accordance with Turkish Law:

3. Based on document review and management interview.

NC Photo#1

3.Based on document review, management and worker's interview

4. Based on document review and management interview.

NC Photo#2

Use of Work Equipment Regulations Health and Safety Requirements Appendix 3 / Art 2.1.4 / Art 2.2.3 /Art 2.3.4 Annually checks according to list 1: Steam generator, heat generator, LPG tubes, Air tanks, compressors, Forklifts, Lifts, Vinch, electrical grounding, fire equipment, fire hoses, hydrophores, pipe infrastructure, air ventilation, air condition equipment.

Recommended corrective action:

It is recommended that management shall ensure non-conformities corrected and updated electrical installation inspection report. (Fenni muayene raporlarındaki uygunsuzlukların giderildiğinden ve raporun güncellendiğinden emin olunuz.)

1st Full Follow-up audit conducted on 21 September 2021:

Issue found closed.

The electrical installation check was conducted by the authorized inspection authority 15.04.2021.

5. Description of non-compliance:

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

During the document review and management interview it was noted that the air tanks check was conducted by the authorized inspection authority on 04.11.2020 but there were some non-conformities so the facility has not yet received the renewal inspection report.

(04.11.2020 tarihli hava tankları fenni muayene raporlarında uygunsuzluklar mevcut)

Local law and/or ETI requirement:

In accordance with ETI base code 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.

In accordance with Turkish Law:Use of Work Equipment Regulations Health and Safety Requirements Appendix 3 / Art 2.1.4 / Art 2.2.3 /Art 2.3.4 Annually checks according to list 1: Steam generator, heat generator, LPG tubes, Air tanks, compressors, Forklifts, Lifts, Vinch, electrical grounding, fire equipment, fire hoses, hydrophores, pipe infrastructure, air ventilation, air condition equipment

Recommended corrective action:

It is recommended that management shall ensure non-conformities corrected and updated air tanks inspection report. (Fenni muayene raporlarındaki uygunsuzlukların giderildiğinden ve raporun güncellendiğinden emin olunuz.)

1st Full Follow-up audit conducted on 21 September 2021:

Issue found closed.

The air tanks check was conducted by the authorized inspection authority dated on 15.04.2021.

4. Based on document review, management and worker's interview

5. Based on document review and management interview.

NC Photo#3

5. Based on document review, management and worker's interview

6. Description of non-compliance:

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

It was noted through during plant tour and workers interview that 01 out of 02 canteen workers, did not receive hygiene training. (2 mutfak çalışanı mevcut, 1 çalışanın hijyen eğitim belgesi yok.)

Local law and/or ETI requirement:

In accordance with ETI base code 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.

Hygiene Training Regulation No: 28698, Art. 5; (1) In workplaces covered in terms of this regulation is not allowed to employed workers without certificate that given by Directorate General. Owners and managers are responsible in the first degree to give workers hygiene training and employed them with certification.

Recommended corrective action:

It is recommended that management shall ensure canteen worker attend to hygiene training. (Mutfak çalışanın hijyen eğitime katılmasından emin olunuz)

1st Full Follow-up audit conducted on 21 September 2021:

Issue found closed.

Fatma Kalaba certificate issued on 28.08.2018 reviewed by audit team.

1. Description of non-compliance:

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

It was noted through plant tour and workers interview found that 1 new started employee (2 days before) could not receive health and safety training. (Yeni başlayan çalışan ait iş güvenliği eğitim kayırları görülemedi.)

Local law and/or ETI requirement:

In accordance with ETI base code 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.

Turkish Health and Safety Law 6331 Art.17: (1) The employer shall ensure that each worker receives safety and health training. This training shall be provided on recruitment, in the event of a transfer or a change of job, in the event of a change in equipment or introduction of any new technology. The training shall be adapted to take account of new or changed risks and repeated periodically if necessary.

Recommended corrective action:

6. Based on plant tour and worker's interview.

6. Based on document review, management and worker's interview

7. Based on document review and management interview

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<p>It is recommended that management shall ensure employees shall have safety trainings in adequate time. (İş güvenliği eğitim kayıtları)</p>	
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Observation:	
<p>Description of observation: None Observed Local law or ETI requirement: Not Applicable Recommended corrective action: Not Applicable</p>	<p>Objective evidence observed: Not Applicable</p>

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



4: Child Labour Shall Not Be Used

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- The facility has established a practice that they will never employ and use any child labour.
- The facility verifies all workers' original national ID card, birth certificate etc. at the time of recruitment and keeps the photocopies of workers' ID cards, birth certificate in their personal files.
- Factory verifies the workers age through registered doctors.
- Sampling basis employees' personal files was taken for review. Each employee file included a bio-data sheet, recent photo, birth registration certificate / photo copied national identification card and other documents.
- There was no child or young employee observed in the facility.
- It was evident during the documents review, the age of youngest worker is 19+years old (DOB: 28.08.2002). During the facility walkthrough, there were no concerns regarding child labour observed

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

Details:

- 1.The procedure of <Recruiting regulation> was available for review, the personnel files with ID or birth certificate copy were available for review, the contracts with all the employees were available for audit, and the roster had established by the factory.
2. Document review
3. Management interview
4. Worker interview
5. On-site observation during floor visit

Any other comments: None

A: Legal age of employment:	15 with restrictions
B: Age of youngest worker found:	19
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

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D: % of under 18's at this site (of total workers)	0 %
E: Are workers under 18 subject to hazardous work assignments? <u>(Go to clause 3 – Health and Safety)</u>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details

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

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

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

5: Living Wages are Paid

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

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

ETI

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

Current Systems and Evidence Examined

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

Current systems:

- All employees are paid above minimum wage according social security registration, bank payment records and interviewed workers. However, since April 2020 working hours for attendance sheet are not recorded with fingerprint system as previously used before. Supervisors filling the tick box of workers to verify their presence only. No hour/minute clock time written. It is also not clear on which shift was worked. OT worked hours is recorded, however hour/minute clock time is also not recorded no details could be seen. Management advised that the fingerprint system is not used due to the risks of Covid-19. */In the follow up audit, hour/minute clock time written. It is clear on which shift was worked. OT worked hours is recorded, however hour/minute clock time is also recorded, and details could be seen. The fingerprint system is used.*
- Due to not verified working hours, wages, overtime compensation and benefits not verified for this section. Please see working hours section for details. */In the follow up audit, Due to verified working hours, wages, overtime compensation and benefits verified for this section.*
- The lowest wage of employees is TRY 3200 (net) per month which is above legal minimum wage.
- Monthly wages are paid between the 1st and 10th day of each month via bank transfer latest.

/1st Full Follow-up audit conducted on 21st September 2021 that one (1) noncompliance found closed.

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

Details:

Bank payment dates of sampled months:

July: 12th August 2020

October: 11nd November 2020

February: It was calculated however not paid yet.

Social security registration records of sampled 3 months

Any other comments: None

Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code</p> <p>It was noted through during document review and management interview that there are no in-out time recordings for attendance sheet. Supervisors filling the tick box of workers to verify their presence only. No hour/minute clock time written since April 2020. Therefore, wages, overtime compensation and benefits could not be fully verified. (Nisan 2020'den beri giriş-çıkış zaman kayıtları tutulmamaktadır. Bu nedenler maaşlar, fazla mesai ödemeleri ve ek haklar tam olarak doğrulanamamıştır.)</p> <p>Local law and/or ETI requirement: Working Hours Regulation Related with Labor Law Art 9: Employer shall proof working hours of employees with appropriately tools. (In and out times recordings)</p> <p>Recommended corrective action: It is recommended that management shall ensure Wages and benefits should be verifiable. (Ücretler ve yan haklar doğrulanmalıdır.)</p> <p><u>1st Full Follow-up audit conducted on 21 September 2021:</u> Issue found closed.</p> <p>There were in-out time recordings are available. That was verified by audit team.</p>	<p>Objective evidence observed: 1. Time records Payrolls Social security registration records review. Photo evidence NC Photo#4</p> <p>2. Based on document review, management and worker's interview</p>

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

Good Examples observed:	
<p>Description of Good Example (GE): 1. Lunch and transport are provided free of charge</p>	<p>Objective Evidence Observed: 1. Worker interviews Management interview</p>

Summary Information

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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/week	A1: Not verified /45 hours per week.	A2: <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 overtime per year / 11 total hours per day (regular + overtime)	B1: Not verified /Actual overtime within the legal limits.	B2: <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: TRY 2557,59 /month	C1: TRY 3200/month	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: 150 % of normal hours	D1: Not verified / Net 17.05 TL per hour.	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Wages analysis: (Click here to return to Key Information)	
A: Were accurate records shown at the first request?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A1: If No , why not?	<p>Management advised that the fingerprint system is not used due to the risks of Covid-19. Supervisors filling the tick box of workers to verify their presence only. No hour/minute clock time written. It is also not clear on which shift was worked. OT worked hours is recorded, however hour/minute clock time is also not recorded no details could be seen. This method doesn't meet local law requirement for accurate time recordings. /Hour/minute clock time written. It is clear on which shift was worked. OT worked hours is recorded, however hour/minute clock time is also recorded, and details could be seen. The fingerprint system is used.</p> <p>Company provided wages, payroll and social security institution records; however, they not proof whether workers paid correctly or not due to improper time records. / Workers paid correctly or and due to verified working hours, wages, overtime compensation and benefits verified for this section.</p>

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<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>As mentioned above all provided time records not contain in-out times of workers. / As mentioned above all provided time records contain in-out times of workers. February 2021: Current / August 2021: Current October 2020: Peak / May 2021: Stable July 2020: Low / July 2021: Stable 10 workers' samples checked for 3 months / 10 workers' samples checked for 3 months</p>		
<p>C: Are there different legal minimum wage grades? If Yes, please specify all.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>C1: If Yes, please give details: Not applicable</p>	
<p>D: If there are different legal minimum grades, are all workers graded and paid correctly?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<p>D1: If No, please give details: Not applicable</p>	
<p>E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?</p>	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input checked="" type="checkbox"/> Above Not verified / Verified	<p>E1: Lowest actual wages found: E1: Lowest actual wages found: Note: full time employees and please state hour / week / month etc. Net 2.825,90 TL per month.</p>	
<p>F: Please indicate the breakdown of workforce per earnings:</p>	<p>F1: ____% of workforce earning under minimum wage F2: ____% of workforce earning minimum wage F3: ____% of workforce earning above minimum wage F1: 0% of workforce earning under minimum wage F2: 85% of workforce earning minimum wage F3: 15% of workforce earning above minimum wage Not verified / Verified</p>		
<p>G: Bonus Scheme found: Please specify details:</p>	<p>Bonus Scheme found: Not verified / Verified Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc. No bonus scheme payment</p>		
<p>H: What deductions are required by law e.g. social insurance? Please state all types:</p>	<p>Wages and working hours not verified. / Wages and working hours verified. As per provided payroll records, social security contribution and tax deducted. /Social insurance (pension, accident, unemployment, medical and maternity insurance), personal income tax, etc</p>		
<p>I: Have these deductions been made?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>I1: Please list all deductions that have been made.</p>	<ol style="list-style-type: none"> 1. Social insurance 2. Tax 1. Social Security Premium 2. Unemployment Fund 3. Stamp Tax 4. Income Tax

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			Please describe: Wages not verified. /It was correctly with the law.
		I2: Please list all deductions that have not been made.	1. 2. Please describe: Not applicable
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
K: Were any inconsistencies found? (if yes describe nature)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	K1: Type <input type="checkbox"/> Poor record keeping <input checked="" 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 checked="" type="checkbox"/> No L1: Please give details: Working hours not verified. / Records provided by the factory reflect all the time worked.		
M: Is there a defined living wage: This is <i>not normally</i> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please specify amount/time: There is a defined hunger limit for a 4-member family: TRY 2652 for 2021 There is a defined poorness level for a 4 member family: TRY 8638 for 2021.		
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details: Those calculations are done by Turk-IS (Collaboration of Unions)		
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Years in each January.		
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

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<p>P: Is there evidence that equal rates are being paid for equal work:</p>	<p><input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>P1: Please give details: Wages and working hours not verified. / Payment records.</p>
<p>Q: How are workers paid:</p>	<p><input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input checked="" type="checkbox"/> Other</p> <p>Q1: If other, please explain: Wages and working hours not verified. / Wages and working hours not verified.</p>

6: Working Hours are not Excessive

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

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

ETI

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- In this audit, auditor had randomly selected production record, such as: Material in/out records, daily production reports, and crosschecked these records with payroll records and
- Through employees' interview, overtime is voluntary.
- The time frame of the records reviewed are as follows:
 - 10 sample months of February- 2021 (recent month) /10 sample months of August- 2021(recent month)
 - 10 sample months of October- 2020 /10 sample months of July- 2021
 - 10 sample months of July- 2020 /10 sample months of May- 2021

OT could not verify from three sample months. Since April 2020 working hours for attendance sheet are not recorded with fingerprint system as previously used before. Supervisors filling the tick box of workers to verify

their presence only. No hour/minute clock time written. It is also not clear on which shift was worked. OT worked hours is recorded, however hour/minute clock time is also not recorded no details could be seen. Management advised that the fingerprint system is not used due to the risks of Covid-19. This method doesn't meet local law requirement for accurate time recordings. Therefore, working hours not verified. The employee works for 06 days in a week. Working days are from Monday to Saturday. Sunday is off day. Operation is operated only in cutting section in 2 shifts. First shift from 08:00 – 16:30 and second shift from 16:00 – 00:30 with 60 mins break time in total. All other sections are operated in one shift from 08:00 – 16:00. Employees were interviewed from both shifts. / OT worked hours is recorded, however hour/minute clock time is also recorded, and details could be seen. The fingerprint system is used. According to time, records and worker interview basic working hours were 9 hours per day and a max 45 hours per week. OT was 2 hours per day and maximum 11 hours per week found in three sample months.

/1st Full Follow-up audit conducted on 21st September 2021 that one (1) noncompliance found closed.

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

Details:

1. Employee interview
2. Management interview
3. Local and national laws
4. Factory policy on working hours
5. Attendance and wages records from March 2020 to the audit day
6. Sample pay slips with recorded hours all workers interviewed
7. Quality and production records to cross check hours
8. Workers contracts

Any other comments: None

Non-compliance:

1. Description of non-compliance:

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

It was noted through during document review and management interview that there are no in-out time recordings for attendance sheet. Supervisors filling the tick box of workers to verify their presence only. No hour/minute clock time written since April 2020. Working hours could not be verified. (Giriş çıkış kayıtları mevcut değildir. Şefler çalışanlar için giriş çıkış takibi için bir kutucuk işaretliyor Nisan 2020 den beri. Giriş çıkış kayıtları doğrulanamadı)

Local law and/or ETI requirement:

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

Working Hours Regulation Related with Labor Law Art 9 Employer shall proof working hours of employees with appropriately tools. (In and out times recordings)

Recommended corrective action:

Objective evidence observed:

1. Based on time records review

Photo evidence

NC Photo#5

<p>It is recommended that management shall ensure Employer shall maintain proof working hours of employees with appropriately. (In and out times recordings) İşveren uygun metodlar ile zaman kayıtlarını ispatlamalıdır. (Giriş ve çıkış kayıtları)</p> <p>1st Full Follow-up audit conducted on 21 September 2021:</p> <p>Issue found closed.</p> <p>The in-out time recordings are available. That is verified by audit team.</p>	<p>1. Based on document review, management and worker's interview</p>
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Observation:	
<p>Description of observation: None observed</p> <p>Local law or ETI requirement: Not Applicable</p> <p>Comments: Not Applicable</p>	<p>Objective evidence observed: Not Applicable</p>

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

Working hours' analysis Please include time e.g. hour/week/month (Go back to Key information)	
Systems & Processes	
A. What timekeeping systems are used: time card etc.	Describe: Manually filling boxes of a list by supervisors in behalf of workers without describing in-out times (since April 2020). /Fingerprint system
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details: Not applicable
C: Are standard/contracted working hours defined in all	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details: Not applicable

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contracts/employment agreements?						
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>D1: If YES, please complete as appropriate:</p> <table border="1"> <tr> <td><input type="checkbox"/> 0 hrs</td> <td><input type="checkbox"/> Part time</td> <td><input type="checkbox"/> Variable hrs</td> <td><input type="checkbox"/> Other</td> </tr> </table> <p>If "Other", Please define:</p> <p>N/A</p>	<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other
<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other			
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	<p>E1: If yes, please detail hours, %, types of workers affected and frequency</p> <p>Please give details: Not applicable</p>				
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<p>F2: Please select all applicable:</p> <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input checked="" type="checkbox"/> No If 'No', please explain: Not verified / Verified	<p>F3: Is this allowed by local law?</p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Not verified / Verified				
		<p>Maximum number of days worked without a day off (in sample):</p> <p>Not verified / Verified</p>				
Standard/Contracted Hours worked						
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>G1: If yes, % of workers & frequency: N/A</p> <p>Not verified / Verified</p>				
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	<p>H1: If yes, please give details:</p> <p>N/A</p>				
Overtime Hours worked						

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<p>I: Actual overtime hours worked in sample (State per day/week/month)</p>	<p>Highest OT hours: <i>N/A</i> Not verified / Verified</p>	
<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 Not verified / Verified</p>	
<p>K: Approximate percentage of total workers on highest overtime hours:</p>	<p>0% Not verified / Verified</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>L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Based on the factory policy, rules and regulations, and training records, employee handbook and workers and management interview it was noted that the overtime is voluntary in this factory.:</i></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 Not verified / Verified</p>	<p><i>M1: Please give details of normal day overtime premium as a % of standard wages: Overtime premium for weekdays and weekly day off: 150%, overtime premium for official holidays: 200%</i></p>
<p>N: Is overtime paid at a premium?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Not verified / Verified</p>	<p><i>N1: If yes, please describe % of workers & frequency: 30% workers, monthly.</i></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 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 checked="" type="checkbox"/> Other Not verified / Verified</p> <hr/> <p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p>	

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	N/A
<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p>	<input type="checkbox"/> Overtime is voluntary <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 checked="" type="checkbox"/> Other reasons (please specify) Not verified / Verified
	<p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p>
	N/A
<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>Q1: If yes, please give details: /N/A Not verified / Verified</p>
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Not verified / Verified

7: No Discrimination is Practiced

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- 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.
- Gender discrimination was also absent in the facility; both female and male workers were distributed in all types of work.
- There was no evidence of sexual harassment.
- There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases.
- The factory provides the same wage amount to male/female employees of the same rank.
- There is no restriction for formation of trade union in the factory.

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

Details:

1. The hiring and termination procedure, leave application records and employee handbook.
2. Payroll records
3. Attendance records
4. Termination records
5. Training records
6. Employment contracts were provided for review and they showed that male and female employees were on the same pay grade.
7. Management interview and employee interview

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: 57.2 % A2: Female: 42.8%
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	0

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<p>C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:</p>	<p> <input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found </p> <p>C1: Please give details: Not applicable</p>
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Professional Development	
<p>A: What type of training and development are available for workers?</p>	<p>Special On-Job Training, OHS Training, Fire Safety Trainings, Legal Rights Training, Environmental Training.</p>

<p>B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?</p>	<p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No </p> <p>If no, please give details:</p>
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Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed Local law and/or ETI requirement: Not Applicable Recommended corrective action: Not Applicable</p>	<p>Objective evidence observed: Not Applicable</p>

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

<p>Good Examples observed:</p>

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Description of Good Example (GE): None observed	Objective Evidence Observed: Not Applicable
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8: Regular Employment Is Provided

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

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

ETI

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

Additional Elements: Responsible Recruitment

8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.

8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.

8.5 Employment agencies must only supply workers registered with them.

8.6 Workers pay no recruitment fee at any stage of the recruitment process.

8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.

Current Systems and Evidence Examined

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

Current systems:

- All employees were recruited by the factory directly.
- No labour agency was used to hire workers. No temporary worker, apprenticeship schemes or home worker was identified by the auditors.
- No subcontractors were used.
- All workers getting signed labour contract and ID card during their recruitment.
- Factory maintains service books for all workers
- Factory has policy to provide all kinds of compensation and benefits to the employees.
- If any employees want to leave the job, he or she may leave giving 2 weeks' notice prior to leave as per law.
- No temporary worker, apprenticeship schemes or home worker was identified by the auditor.

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

Details:

1. Factory policy, rules and regulations, employees' personnel files, employees' ID card, pay slips etc.
2. Management interview and employee interview
3. The hiring and termination records.
4. Worker interview

Any other comments: None

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

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

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

Responsible Recruitment

All Workers	
<p>A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?</p>	<p><input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions A1: If any are unchecked, please describe finding and specific category(ies) of workers affected: Not applicable</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 B1: If yes, please describe details and specific category(ies) of workers affected: Not applicable</p>

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<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 – C1: If other, please give details: N/A
<p>D: If any checked, give details:</p>	N/A

<p>Migrant Workers:</p> <p><i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i></p>	
<p>A: Type of work undertaken by migrant workers:</p>	No migrant workers
<p>B: Please give details about recruitment agencies for migrant workers:</p>	B1: Total number of (in country recruitment agencies) used: B2: Total number of (outside of local country) recruitment agencies used: Not applicable
<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>	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: Not applicable C2: Observations: Not applicable
<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 D1: If yes, number and example of roles:

NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other B1 – If other, please give details: Not applicable
C: If any checked, give details:	N/A

Agency Workers (if applicable) <i>(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)</i>	
A: Number of agencies used (average):	A1: Names if available: Not Applicable
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 D1: Please give details: Not applicable

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<p>E: Does the site have a system for checking labour standards of agencies? If yes, please give details.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>E1: Please give details: Not Applicable</p>
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Contractors:	
<p><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></p>	
<p>A: Any contractors on site?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>A1: If yes, how many contractors are present, please give details: Not applicable</p>
<p>B: If Yes, how many workers supplied by contractors?</p>	<p>Not Applicable</p>
<p>C: Do all contractor workers understand their terms of employment?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>C1: Please describe finding: N/A</p>
<p>D: If Yes, please give evidence for contractor workers being paid per law:</p>	<p>Not Applicable</p>

8A: Sub-Contracting and Homeworking

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

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

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

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

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems:

- As per the facility documents review, management, worker interview and factory tour, there was no sub-contractor or home working used by facility currently
- Therefore, no apparent concern was detected regarding this section

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

Details:

1. Site tour (Calculation on total production and estimated capacity)
2. Materials in/out records
3. Management interview
4. Worker interview

Any other comments: None

Non-compliance:

1. Description of non-compliance:

NC against ETI/Additional Elements NC against Local Law

NC against customer code:

None observed

Local law and/or ETI /Additional Elements requirement:

Not Applicable

Recommended corrective action:

Not Applicable

Objective evidence observed:

Not Applicable

Observation:

Description of observation:

None observed

Objective evidence observed:

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Local law or ETI/Additional elements requirement: Not Applicable Comments: Not Applicable	Not Applicable
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Good Examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed: Not Applicable

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

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

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	Not applicable
E: How does the site ensure worker hours and pay meet local laws for homeworkers?	Not Applicable
F: What processes are carried out by homeworkers?	Not Applicable
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Not Applicable
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable

9: No Harsh or Inhumane Treatment is Allowed
[\(Click here to return to summary of findings\)](#)

ETI

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

Additional elements:

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 rd party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Grievance procedures present. Worker representative system, grievance boxes and open door policy
B: If Yes , are workers aware of these channels and have access? Please give details.	Worker representative is well known by workers.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Suggestion boxes used.
D: Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Workers <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other D1: Please give details: Grievance mechanism implemented and followed by worker reps and HR department
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: If no, please give details
G: Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain
H: If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: If no, please give details



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<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>II: If yes, please give details</p>
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Current Systems and Evidence Examined

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

Current systems:

- The facility has established anti-harassment or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
- Anti-harassment issue is also covered in employee training.
- Through the factory management and employees' interview, it was noted that no physical abuse happened in the factory.
- There is an internal process for grievance, which is through grievance box where an employee can report any grievances (harassment, discrimination etc.) anonymously, any received complaint will be handled by management, without any reprisal for the worker in question

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

Details:

- The relevant policy on prevention of harassment and abuse
- Internal grievance procedure documentation.
- Training records
- Management interview and employee interview

Any other comments: None

Non-compliance:

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

<p>Description of observation:</p> <p>None observed</p> <p>Local law or ETI requirement:</p> <p>Not Applicable</p> <p>Comments:</p> <p>Not Applicable</p>	<p>Objective evidence observed:</p> <p>Not Applicable</p>
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Good Examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed: Not Applicable

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

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

Additional Elements

10A.1 Only workers with a legal right to work shall be employed or used by the supplier.

10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

Current Systems and Evidence Examined

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

Current systems:

- Per document review, factory management representation and worker interview, it was observed that all workers in the factory were Turkish and 100% were local workers.
- All workers had the proper legal rights to work in this region.
- All of them were recruited directly by the factory and no agency was involved in factory's recruitment processes.
- No agency staff or foreign worker was used by the factory.
- The factory recruits new worker only through posting recruiting advertisement on newspaper, some of production employees were introduced by fellow-villager, the workers have not paid any deposit when they were recruit in the factory.
- There were not any deductions for items such as travel and equipment.

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

Details:

1. Hiring procedure
2. Personnel files
3. Worker handbook
4. Worker interview
5. Management interview

Any other comments: None

Non-compliance:

1. Description of non-compliance:

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

None observed

Local law and/or ETI /Additional Elements requirement:

Not Applicable

Recommended corrective action:

Not Applicable

Objective evidence

observed:

Not Applicable

Observation:

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<p>Description of observation: None observed</p> <p>Local law or ETI/Additional Elements requirement: Not Applicable</p> <p>Comments: Not Applicable</p>	<p>Objective evidence observed: Not Applicable</p>
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Good examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p>Objective Evidence Observed: Not Applicable</p>

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

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

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

B.4. Compliance Requirements

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

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

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

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

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

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

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

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

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

B4. Guidance for Observations

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- Through onsite inspection, interviews and document review, no violation of environment pollution was observed.
- The factory had established an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.
- The facility has Environmental permit which was issued by local Authority on 28.11.2019. The facility has Environmental impact exemption report dated 12.02.2021. The facility has agreements with accredited companies on waste collection depending on wasted types (hazardous waste, oil waste, palette waste Those placed in segregated area outside of the building.

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

Details:

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- Facility tour
- Employee interviews
- Management review
- Environmental Permit Exemption Letter. The company has agreement with accredited companies for packing waste, non – hazardous waste

Any other comments: None

Non-compliance:

1. Description of non-compliance:

NC against ETI/Additional Elements NC against Local

NC against customer code:

None observed

Local law and/or ETI/Additional Elements requirement:

Not Applicable

Recommended corrective action:

Not Applicable

Objective evidence observed:

Not Applicable

Observation:

Description of observation:

None observed

Local law or ETI/Additional elements requirements:

Not Applicable

Comments:

Not Applicable

Objective evidence observed:

Not Applicable

Good examples observed:

Description of Good Example (GE):

None observed

Objective Evidence Observed:

Not Applicable



Environmental Analysis <i>(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)</i>	
A: Is there a manager responsible for Environmental issues (Name and Position):	Mustafa Ali Genc – Assistant Manager
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Environmental impact risk assessment dated 24.01.2019
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: 14001:2015 dated 20.11.2020
D: Does the site have an Environmental policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, is it publicly available? It is not publicly available.
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: It addressed improvements.
F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please give details. <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: No such system found.
H: Have all legally required permits been shown? Please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Environmental Permit report dated 05.07.2017
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A I1: Please give details: Records provided for review
J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Company follow the requirements and legislation in the destination countries regarding environmental and chemical issues.
K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

	K1: Please give details: The reductions on water consumption and discharge, waste, energy and green-house gas emissions	
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: The hazardous wastes are disposed properly by the licensed firms. Additionally they have a segregated system for re- use.	
M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: The facility monitors consumption of energy and natural resources.	
N: Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: The facility communicates their requirements to business partners	
Usage/Discharge analysis		
Criteria	Previous year: Please state period: _____ 2020 _____	Current Year: Please state period: 2021 / January to August 2021
Electricity Usage: Kw/hrs	926.852 Kw/ years	154.500 kw /604.500 kw
Renewable Energy Usage: Kw/hrs	N/A	N/A
Gas Usage: Kw/hrs	N/A	N/A
Has site completed any carbon Footprint Analysis?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If Yes , please state result	NA	NA
Water Sources: Please list all sources e.g. lake, river, and local water authority.	<ul style="list-style-type: none"> Natural well water 	<ul style="list-style-type: none"> Natural well water
Water Volume Used: (m ³)	N/A (source is from rainwater)	N/A (source is from rainwater)
Water Discharged: Please list all receiving waters/recipients.	Domestic wastewater is collected in a septic tank, drawn through a sewage truck and delivered to the	Domestic wastewater is collected in a septic tank, drawn through a sewage truck and delivered to the

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	treatment facility belonging to the nearest IZSU (Municipality Water Treatment Company). The water used in the process is collected, kept in sedimentation pools and used again in the process.	treatment facility belonging to the nearest IZSU (Municipality Water Treatment Company). The water used in the process is collected, kept in sedimentation pools and used again in the process.
Water Volume Discharged: (m ³)	160 m3	26 m3 /101m3
Water Volume Recycled: (m ³)	7200 m3	1350 m3 /6010m3
Total waste Produced (please state units)	6500 kg / per year	1083 kg /4165 kg
Total hazardous waste Produced: (please state units)	Contaminated packaging 100 kg Contaminated waste 80kg	Contaminated packaging 15 kg Contaminated waste 8 kg /Contaminated packaging 60 kg Contaminated waste 12 kg
Waste to Recycling: (please state units)	10 kg plastic – 20kg paper- 20 kg metal	2 kg plastic – 1 kg paper-2 kg metal /8 kg plastic – 4 kg paper-8 kg metal
Waste to Landfill: (please state units)	2500 tonnes	416 tonnes /1610 tonnes
Waste to other: (please give details and state units)	Not Applicable	Not Applicable
Total Product Produced (please state units)	15525 tonnes	2500 tonnes/10000 tonnes

10C: Business Ethics – 4-Pillar Audit

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

To be completed for a 4-Pillar SMETA Audit

10C. Compliance Requirements

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

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

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

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

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

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

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

10C. Guidance for Observations

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- The facility conducts their business ethically without bribery, corruption, or any type of fraudulent Business Practice.
- Businesses meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices. They have Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice. The facility has a designated person Gülcesu Adagideli who is responsible for implementing standards concerning Business Ethics.
- The facility has access to a transparent system in place for confidentially reporting and dealing with unethical Business Ethics without fear of reprisals towards the reporter.

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

Details:

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- The company business ethics policy including Bribery Corruption
- Training records
- Worker handbook
- Reports from Anonymous email account
- Management interview
- Worker interview

Any other comments: None

Non-compliance:

1. Description of non-compliance:

- NC against ETI/Additional Elements NC against Local
 NC against customer code:
 None observed

Local law and/or ETI/Additional Elements requirement:

Not Applicable

Recommended corrective action:

Not Applicable

Objective evidence observed:

Not Applicable

Observation

Description of observation:

None observed

Local law or ETI/Additional elements requirement:

Not Applicable

Comments:

Not Applicable

Objective evidence observed:

Not Applicable

Good examples observed:

Description of Good Example (GE):

None observed

Objective Evidence Observed:

Not Applicable

A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?

- Internal Policy
 Policy for third parties including suppliers

A1: Please give details: The facility has a Business Ethics policy it was communicated and applied internally

B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?

- Yes
 No

B1: Please give details: The facility provided the trainings records for review latest was on 03.07.2020 for all workers



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C: Is the policy updated on a regular (as needed) basis?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: Business Ethics Policy is updated regularly.
D: Does the site require third parties including suppliers to complete their own business ethics training	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: The suppliers are required to complete their own business ethics training



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Other findings

Other Findings Outside the Scope of the Code
None Observed

Community Benefits
<i>(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)</i>
None Observed



Appendix 1

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

Not Applicable please x










NOTE: The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.

Instruction to Audit Company: fill in the relevant clauses from the Customer Supplier Code - where applicable.



Photo Form

<p>External view of the building & Factory name</p>	<p>Cutting section</p>	<p>Sizing machine</p>
<p>Bridge cutter machine</p>	<p>Sanding machine</p>	<p>Cutting machine</p>
<p>Cube stone press section</p>	<p>safety pedal attached on cube stone press machine</p>	<p>Sorting area</p>

<p>Finished products</p>	<p>Prefabricate admin offices, doctor room, locker</p>	<p>Doctor room</p>
		
<p>Toilets</p>	<p>Locker</p>	<p>External rest area</p>
		
<p>Lunch hall</p>	<p>Tested emergency lighting</p>	<p>Air compressor & air tank</p>
		
<p>Forklift</p>	<p>PPE signage</p>	<p>Safety button attached on cutting machine and tested</p>







		
<p>Emergency exit signage & industrial type emergency lighting</p>	<p>Evacuation map</p>	<p>Medical box</p>
		
<p>Fire extinguisher & optimal pressure</p>	<p>Fuse box</p>	<p>Industrial type emergency lighting</p>
		
<p>Waste collection box</p>		

Photo Form (Follow UP Audit)



Water treatment area	Finishing Process	Finishing Process
		
Cutting	Cutting	Cutting
		
Cutting	Cutting	Cutting
		
Cutting	Storage area	Storage area



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

[Click here for Supplier \(B\) members:](#)

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

[Click here for Auditors:](#)

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

