




SMETA Corrective Action Plan Report (CAPR)

Version 6.1



Audit Details			
Sedex Company Reference: (only available on Sedex System)	ZC: 421132980	Sedex Site Reference: (only available on Sedex System)	ZS: 421187225
Business name (Company name):	DEPA EV VE MUTF. GERC. SAN VE TIC. LTD. STI.		
Site name:	English: Depa Home and Kitchen Utensils Ind. Trade Limited Company Turkish: DEPA EV VE MUTF. GERC. SAN VE TIC. LTD. STI.		
Site address: (Please include full address)	English: Maltepe Town. Bestekar Medeni Aziz Efendi St. No:6 / 1 34010 Zeytinburnu / Istanbul / TURKEY Turkish: Maltepe Mah. Bestekar Medeni Aziz Efendi Sok.No:6 / 1 34010 Zeytinburnu / Istanbul / TURKEY	Country:	TURKEY
Site contact and job title:	Mr. Mesut AKAN / Company Owner		
Site phone:	0090 212 511 1687	Site e-mail:	mesutakan@depahediyelik.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labor Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar <input type="checkbox"/> Business Ethics
Date of Audit:	Initial: 2022/11/01 1 st Follow up: 2023/01/31		

Audit Company Name & Logo: 	Report Owner (payer): (If paid for by the customer of the site please remove for Sedex upload) DEPA EV VE MUTF. GERC. SAN VE TIC. LTD. STI.
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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)			

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 (March 2019) 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.
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Any exceptions to this must be recorded here (e.g. different sample size): N/A

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

Lead auditor: Safak Nazlican RA 21700055 [1st Follow up: Orhan Kazgan CSCA 21704151](#)

Team auditor: N/A

Interviewers: Safak Nazlican [1st Follow up: Orhan Kazgan CSCA 21704151](#)

Report writer: Safak Nazlican RA 21700055 [1st Follow up: Orhan Kazgan CSCA 21704151](#)

Report reviewer: Doreen Tang

Date of declaration: 2022/11/01 [1st Follow up: 2023/01/31](#)

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.

Audit Parameters

Audit Parameters			
A: Time in and time out	Day 1 Time in: 09:02 Day 1 Time out: 16:37 Day 1 Time in: 09:00 Day 1 Time out: 16:15	Day 2 Time in: N/A Day 2 Time out: N/A	Day 3 Time in: N/A Day 3 Time out: N/A
B: Number of auditor days used:	1 (1 auditor x 1 day)		
C: Audit type:	<input checked="" type="checkbox"/> <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: 3 weeks <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 details in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mr. Mesut AKAN / Company Owner		
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 2022/11/01		
J: Previous audit type:	N/A Initial audit		
K: Were any previous audits reviewed for this audit	<input checked="" 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
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present, please explain reasons why <i>(only complete if no worker reps present)</i>	N/A		
E: If Union Representatives were not present, please explain reasons why: <i>(only complete if no union reps present)</i>	There was no registered union or union representative at the facility.		

Guidance

The Corrective Action Plan Report summarises the site audit findings and a corrective, and preventative action plan that both the auditor and the site manager believe is reasonable to ensure conformity with the ETI Base Code, Local Laws and additional audited requirements. After the initial audit, the form is used to re-record actions taken and to categorise the status of the non-compliances.

N.B. observations and good practice examples should be pointed out at the closing meeting as well as discussing non-compliances and corrective actions.

To ensure that good practice examples are highlighted to the supplier and to give a more 'balanced' audit a section to record these has been provided on the CAPR document (see following pages) which will remain with the supplier. They will be further confirmed on receipt of the audit report.

Root cause (see column 4)

Root cause refers to the specific procedure or lack of procedure which caused the issue to arise. Before a corrective action can sustainably rectify the situation, it is important to find out the real cause of the non-compliance and whether a system change is necessary to ensure the issue will not arise again in the future.

See SMETA BPG Chapter 7 'Audit Execution' for more explanation of "root cause".

Next Steps:

1. The site shall request, via Sedex, that the audit body upload the audit report, non-compliances, observations and good examples. If you have not already received instructions on how to do this then please visit the web site www.sedexglobal.com.
2. Sites shall action its non-compliances and document its progress via Sedex.
3. Once the site has effectively progressed through its actions then it shall request via Sedex that the audit body verify its actions. Please visit www.sedexglobal.com web site for information on how to do this.
4. The audit body shall verify corrective actions taken by the site by either a "Desk-Top" review process via Sedex or by Follow-up Audit (see point 5).
5. Some non-compliances that cannot be closed off by "Desk-Top" review may need to be closed off via a "1 Day Follow Up Audit" charged at normal fee rates. If this is the case, then the site will be notified after its submission of documentary evidence relating to that non-compliance. Any follow-up audit must take place within twelve months of the initial audit and the information from the initial audit must be available for sign off of corrective action.
6. For changes to wages and hours to be correctly verified it will normally require a follow up site visit. Auditors will generally require seeing a minimum of two months wages and hours records, showing new rates in order to confirm changes (note some clients may ask for a longer period, if in doubt please check with the client).

Corrective Action Plan

Corrective Action Plan – non-compliances									
Non-Compliance Number <i>The reference number of the non-compliance from the Audit Report, for example, Discrimination No.7</i>	New or Carried Over <i>Is this a new non-compliance identified at the follow-up or one carried over (C) that is still outstanding</i>	Details of Non-Compliance <i>Details of Non-Compliance</i>	Root cause <i>(completed by the site)</i>	Preventative and Corrective Actions <i>Details of actions to be taken to clear non-compliance, and the system change to prevent re-occurrence (agreed between site and auditor)</i>	Timescale <i>(Immediate, 30, 60, 90, 180, 365)</i>	Verification Method <i>Desktop / Follow-Up [D/F]</i>	Agreed by Management and Name of Responsible Person: <i>Note if management agree to the non-compliance, and document name of responsible person</i>	Verification Evidence and Comments <i>Details on corrective action evidence</i>	Status <i>Open/Closed or comment</i>
NC 1 3 Working Conditions Are Safe and Hygienic – 1	N/A	Absence of firefighting equipment inspection report It was noted that periodic inspections were not conducted of the firefighting equipment.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	The facility is advised to ensure that periodic inspections (annual) are conducted of their firefighting equipment.	30	Desktop	Mr. Mesut AKAN / Company Owner	1st Follow up (On-site audit): Closed Date: 2023/01/31 It was noted that the facility conducted inspections of their firefighting equipment each month.	Closed
NC 2 3 Working Conditions Are Safe and Hygienic – 2	N/A	Insufficient number of first aider It was noted that the number of certified first aiders was not sufficient based on the total number of employees at the facility. There were 2 certified first aiders, but 1 more was needed.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	The facility is advised to ensure that one certified first aider is available per every 15 employees.	90	Desktop	Mr. Mesut AKAN / Company Owner	1st Follow up (On-site audit): Closed Date: 2023/01/31 It was noted that the facility had enough workers trained in first aid. The facility had 36 employees, with 3 first aid trained workers, which was in compliance with the legal requirement.	Closed

NC 3 3 Working Conditions Are Safe and Hygienic – 3	N/A	MSDS not being posted It was noted that MSDS for the machine maintenance chemicals were not posted where chemicals were used and stored.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	The facility is advised to ensure that MSDS are posted where chemicals are used and stored.	30	Desktop	Mr. Mesut AKAN / Company Owner	1st Follow up (On-site audit): Closed Date: 2023/01/31 It was noted that the facility provided and posted MSDS for their chemicals where chemicals were used and stored.	Closed
NC 4 3 Working Conditions Are Safe and Hygienic – 4	N/A	Damaged fire hoses During the site tour, it was noted that 3 randomly selected fire hoses were damaged.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	The facility is advised to ensure that functional and solid fire hoses are provided on the premises.	30	Desktop	Mr. Mesut AKAN / Company Owner	1st Follow up (On-site audit): Closed Date: 2023/01/31 It was noted that all fire hoses had been repaired and were functional.	Closed
NC 5 3 Working Conditions Are Safe and Hygienic – 5	N/A	Broken, discharged and missing emergency lighting It was noted that one emergency light was not functional at the rear side escape stairs; and the emergency lights on the 1st floor were discharged. There was no emergency lighting in the locker rooms.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	The facility is advised to ensure that functional emergency lights are provided on the premises.	30	Desktop	Mr. Mesut AKAN / Company Owner	1st Follow up (On-site audit): Closed Date: 2023/01/31 It was noted that the facility replaced the non-functioning emergency light at the rear side escape stairs with a new one and one new emergency light was installed on the 1st floor. In addition, the facility installed emergency lights in the men's and women's locker room.	Closed
NC 6 3 Working Conditions Are Safe and Hygienic – 6	Carried Over	Blocked escape aisles It was noted that at the assembly section, the emergency escape path markings on the ground were	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers	The facility is advised to ensure that all emergency escape paths are up to date, open and accessible.	30	Follow Up	Mr. Mesut AKAN / Company Owner	1st Follow up (On-site audit): Open Date: 2023/01/31 It was noted that all emergency	Open

		not up to date and 2 escape paths were partially blocked by carton boxes. Also, one emergency escape path was partially blocked by carton boxes in the warehouse area on the 1st floor.	<input type="checkbox"/> Other – please give details:					evacuation aisles were free of obstruction. However, the emergency evacuation aisle markings on the floor were still not updated in the assembly section.	
NC 7 3 Working Conditions Are Safe and Hygienic – 7	N/A	Dangerous waste area It was noted that there was an incompletely and dangerously mounted water tank approximately 15 meters above the waste storage area.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	The facility is advised to ensure that they have a safe working area.	Immediate	Follow Up	Mr. Mesut AKAN / Company Owner	1st Follow up (On-site audit): Closed Date: 2023/01/31 It was noted that the facility removed the water tank located 15 meters above the waste storage area.	Closed
NC 8 3 Working Conditions Are Safe and Hygienic – 8	N/A	Absence of construction (occupancy) permit It was noted that a construction occupancy permit or construction registration document was not available for the facility's building.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	The facility is advised to provide a construction occupancy permit or construction registration document.	365	Desktop	Mr. Mesut AKAN / Company Owner	1st Follow up (On-site audit): Closed Date: 2023/01/31 It was noted that the facility provided the required construction registration from a local authority for review.	Closed
NC 9 5 Living Wages Are Paid – 1	N/A	Absent time being deducted from the annual leaves It was noted that absent times (minutes and hours) were deducted from the annual leave rights of the employees.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	The facility is advised to ensure that annual leaves are provided to the employees that are in compliance with local law.	60	Follow Up	Mr. Mesut AKAN / Company Owner	1st Follow up (On-site audit): Closed Date: 2023/01/31 It was noted from a document review and management interview that absent times were not deduct from the workers' annual leaves.	Closed

NC 10 5 Living Wages Are Paid – 2	N/A	Saturday overtime practices are not calculated based on actual working hours It was noted that rest day overtime practices conducted on Saturday's was calculated and paid as 7.5 hours even when the actual work was more than 7.5 hours.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	The facility is advised to ensure that overtime practices are paid and calculated according to the actual hours performed.	60	Follow Up	Mr. Mesut AKAN / Company Owner	1st Follow up (On-site audit): Closed Date: 2023/01/31 It was noted that rest day overtime practices conducted on Saturday's were calculated and paid the same as normal work hours. For example, one worker worked 9.5 hours on Saturday in November 2022 and the facility calculated and paid 9.5 hours to this worker.	Closed
NC 11 6 Working Hours Are Not Excessive – 1	N/A	Daily working practices exceeding 11 hours It was noted that 6 out of 10 randomly selected employees worked a max. of 12 hours in a day for once in September 2022.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	The facility is advised to ensure that their daily work schedule including overtime is limited to 11 hours.	60	Follow Up	Mr. Mesut AKAN / Company Owner	1st Follow up (On-site audit): Closed Date: 2023/01/31 It was noted that 10 randomly selected employees did not work more than 11 hours daily.	Closed

Corrective Action Plan – Observations

Observation Number <i>The reference number of the observation from the Audit Report, for example, Discrimination No.7</i>	New or Carried Over <i>Is this a new observation identified at the follow-up or one carried over (C) that is still outstanding</i>	Details of Observation <i>Details of Observation</i>	Root cause <i>(completed by the site)</i>	Any improvement actions discussed <i>(Not uploaded on to SEDEX)</i>
		N/A		

Good examples

Good example Number <i>The reference number of the good example from the Audit Report, for example, Discrimination No.7</i>	Details of good example noted	Any relevant Evidence and Comments
GE 1 - Living Wages Are Paid – 1	Meals are provided free of charge to all employees.	Management and worker interviews

Confirmation

Please sign this document confirming that the above findings have been discussed with and understood by you: (site management) <i>If actual signatures are not possible in electronic versions, please state the name of the signatory in applicable boxes, as indicating the signature.</i>		
A: Site Representative Signature:	Mr. Mesut AKAN	Title: Company Owner Date: 2022/11/01 1 st Follow up 2023/01/31
B: Auditor Signature:	Safak Nazlican, RA21700055 1 st Follow Up: Orhan Kazgan CSCA 21704151	Title: Compliance Auditor Date: 2022/11/01 1 st Follow up 2023/01/31
C: Please indicate below if you, the site management, dispute any of the findings. No need to complete D-E, if no disputes.		
D: I dispute the following numbered non-compliances: N/A		
E: Signed: (If <u>any</u> entry in box D, please complete a signature on this line)		Title Date
F: Any other site Comments: None		

Guidance on Root Cause

Explanation of the Root Cause Column

If a non-compliance is to be rectified by a corrective action which will also prevent the non-compliance re-occurring, it is necessary to consider whether a system change is required.

Understanding the root cause of the non-compliance is essential if a site is to prevent the issue re-occurring.

The root cause refers to the specific activity/ procedure or lack of activity /procedure which caused the non-compliance to arise. Before a corrective action can rectify the situation, it is important to find out the real cause of the non-compliance and whether a system change is necessary to ensure the issue will not arise again in the future.

Since this is a new addition, it is not a mandatory requirement to complete this column at this time. We hope to encourage auditors and sites to think about Root Causes and where they are able to agree, this column may be used to describe their discussion.

Some examples of finding a “root cause”

Example 1

Where excessive hours have been noted the real reason for these needs to be understood, whether due to production planning, bottle necks in the operation, insufficient training of operators, delays in receiving trims, etc.

Example 2

A non-compliance may be found where workers are not using PPE that has been provided to them. This could be the result of insufficient training for workers to understand the need for its use; a lack of follow-up by supervisors aligned to a proper set of factory rules or the fact that workers feel their productivity (and thus potential earnings) is affected by use of items such as metal gloves.

Example 3

A site uses fines to control unacceptable behaviour of workers.

International standards (and often local laws) may require that workers should not be fined for disciplinary reasons.

It may be difficult to stop fines immediately as the site rules may have been in place for some time, but to prevent the non-compliance re- occurring it will be necessary to make a system change.

The symptom is fines, but the root cause is a management system which may break the law. To prevent the problem re-occurring it will be necessary to make a system change for example the site could consider a system which rewards for good behaviour

Only by understanding the underlying cause can effective corrective actions be taken to ensure continuous compliance.

The site is encouraged to complete this section so as to indicate their understanding of the issues raised and the actions to be taken.



For more information visit: [Sedexglobal.com](https://www.sedexglobal.com)

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

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

[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](#)

http://www.surveymonkey.com/s.aspx?sm=riPsbEoPQ52ehCo3lnq5lw_3d_3d

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

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre6gDRglY_2brg_3d_3d

[Click here for Auditors:](#)

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




Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: (only available on Sedex System)	ZC: 421132980	Sedex Site Reference: (only available on Sedex System)	ZS: 421187225
Business name (Company name):	DEPA EV VE MUTF. GERC. SAN VE TIC. LTD. STI.		
Site name:	English: Depa Home and Kitchen Utensils Ind. Trade Limited Company Turkish: DEPA EV VE MUTF. GERC. SAN VE TIC. LTD. STI.		
Site address: (Please include full address)	English: Maltepe Town, Bestekar Medeni Aziz Efendi St. No:6 / 1 34010 Zeytinburnu / Istanbul / TURKEY Turkish: Maltepe Mah. Bestekar Medeni Aziz Efendi Sok.No:6 / 1 34010 Zeytinburnu / Istanbul / TURKEY	Country:	TURKEY
Site contact and job title:	Mr. Mesut AKAN / Company Owner		
Site phone:	0090 212 511 1687	Site e-mail:	mesutakan@depahediyelik.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar <input type="checkbox"/> Labour Standards
Date of Audit:	Initial: 2022/11/01 1 st Follow up: 2023/01/31		

Audit Company Name & Logo: 	Report Owner (payer): <i>(If paid for by the customer of the site please remove for Sedex upload)</i> DEPA EV VE MUTF. GERC. SAN VE TIC. LTD. STI.
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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)
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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/>

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4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
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Auditor Team (s) (please list all including all interviewers):

Lead auditor: Safak Nazlican [1st Follow up: Orhan Kazgan](#) APSCA number: RA21700055
CSCA21704151

Lead auditor APSCA status: RA [1st Follow up: CSCA](#)

Team auditor: N/A APSCA number: N/A

Interviewers: Safak Nazlican [1st Follow up: Orhan Kazgan](#) APSCA number: RA21700055
CSCA21704151

Report writer: Safak Nazlican [1st Follow up: Orhan Kazgan](#)

Report reviewer: Doreen Tang/Senior Compliance Specialist

Date of declaration: 2022/11/01 [1st Follow up: 2023/01/31](#)

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.

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Summary of Findings

Issue (please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.	Area of Non-Conformity (Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)				Record the number of issues by line*:			Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A Universal Rights covering UNGP			<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 type="checkbox"/>	8/1	0	0	Summary of non-compliance findings: <ul style="list-style-type: none"> Absence of firefighting equipment inspection report 1st Follow up (On site) Audit on 2023/01/31 Closed. Insufficient number of first aiders 1st Follow up (On site) Audit on 2023/01/31 Closed. MSDS not posted 1st Follow up (On site) Audit on 2023/01/31 Closed. Damaged fire hoses

									<p>1st Follow up (On site) Audit on 2023/01/31 Closed.</p> <ul style="list-style-type: none"> Broken, drained and missing emergency lighting 1st Follow up (On site) Audit on 2023/01/31 Closed. Blocked escape aisles 1st Follow up (On site) Audit on 2023/01/31 Open. Dangerous waste area 1st Follow up (On site) Audit on 2023/01/31 Closed. Absence of construction (occupancy) permit 1st Follow up (On site) Audit on 2023/01/31 Closed.
4	Child Labour	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None observed
5	Living Wages and Benefits	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	2/0	0	1	<p>Summary of non-compliance findings:</p> <ul style="list-style-type: none"> Absent time being deducted from annual leaves 1st Follow up (On site) Audit on 2023/01/31 Closed. Saturday overtime practices were not calculated based on actual work hours. 1st Follow up (On site) Audit on 2023/01/31 Closed. <p>Summary of GE:</p>

									<ul style="list-style-type: none"> Meals provided free of charge to all employees.
6	<u>Working Hours</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	1/0	0	0	Summary of non-compliance findings: <ul style="list-style-type: none"> Daily working practices exceeding 11 hours. 1st Follow up (On site) Audit on 2023/01/31 Closed.
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"/>	0	0	0	None observed
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	Not applicable, this is a 2-pillar audit.
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	Not applicable, this is a 2-pillar audit.

General observations and summary of the site:

This 1st follow up audit was conducted by Omega Compliance Ltd. 1 auditor assessed / verified the facility's operations against the ETI Base Code and local legislations on a sampling basis in one day.

DEPA EV VE MUTF. GERC. SAN VE TIC. LTD. STI. was established at Tahtakale / ISTANBUL in 2008 and moved to the current location in 2019. Currently, the main production processes are assembly, injection, packing and shipment. Approximately 2 years ago the facility also had a saucepan production process. They still have the machines, but they have not been in use for a long time. Electrical wiring of the machines was removed, and all operators were reassigned to work on assembly or injection processes.

There were 35 workers (21 male, 14 female) in the facility, including 20 production workers and 15 admin staff.

There were no subcontractors used by the facility. The facility's concrete building had a total of 5 floors and all floors were occupied by the auditee. The closed area occupied by the facility was approximately 4,000 sq. meters. There was also a canteen. Work hours and breaks were 7:45-18:00 including two 15-minute-long mid-breaks and 45-minute-long meal breaks from Monday to Friday. Saturday and Sunday were scheduled as weekly rest days. The general attitude and approach of the management was collaborative and transparent. All requested documents were provided in a timely manner.

**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 the severities of each issue – Reviewers need to check audit results by clause.*

Site Details

Site Details																							
A: Company Name:	DEPA EV VE MUTF. GERC. SAN VE TIC. LTD. STI.																						
B: Site name:	DEPA EV VE MUTF. GERC. SAN VE TIC. LTD. STI.																						
C: GPS location: (If available)	GPS Address: Maltepe Mah. Bestekar Medeni Aziz Efendi Sok.No:6 / 1 34010 Zeytinburnu / Istanbul / TURKEY	Latitude: 41.030724 Longitude: 28.910616																					
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: 2021/07/26, No: 2021/RG-83 /5 floor, 4,000 sq. meters Fire Safety Report: 2021/06/29 – 4,000 sqm Occupancy permit: N/A TAX ID: 2920596672 Environmental Permit: 2026/07/28 Environmental Impact Assessment (Out of Scope Letter): 2020/02/26 Ministry Inspection: 2022/03/03																						
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing, etc.	Kitchenware																						
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>A concrete facility building consisting of 5 floors was constructed in 1991. The total closed area of the facility's building was 4,000 sq. meters. There were no other occupants.</p> <table border="1"> <thead> <tr> <th>Production Building no</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Floor -1</td> <td>Warehouse</td> <td>N/A</td> </tr> <tr> <td>Floor 0</td> <td>Injection, shipment</td> <td>N/A</td> </tr> <tr> <td>Floor 1</td> <td>Warehouse</td> <td>Also, saucepan production machines, not currently being used, were kept there.</td> </tr> <tr> <td>Floor 2</td> <td>Office, assembly, packing, canteen, doctor's room</td> <td>N/A</td> </tr> <tr> <td>Floor 3</td> <td>Warehouse</td> <td>N/A</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td>N/A</td> </tr> </tbody> </table>		Production Building no	Description	Remark, if any	Floor -1	Warehouse	N/A	Floor 0	Injection, shipment	N/A	Floor 1	Warehouse	Also, saucepan production machines, not currently being used, were kept there.	Floor 2	Office, assembly, packing, canteen, doctor's room	N/A	Floor 3	Warehouse	N/A	Is this a shared building?	No	N/A
Production Building no	Description	Remark, if any																					
Floor -1	Warehouse	N/A																					
Floor 0	Injection, shipment	N/A																					
Floor 1	Warehouse	Also, saucepan production machines, not currently being used, were kept there.																					
Floor 2	Office, assembly, packing, canteen, doctor's room	N/A																					
Floor 3	Warehouse	N/A																					
Is this a shared building?	No	N/A																					

	<p>For below, please add any extra rows if appropriate.</p> <p>F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>F2: Please give details:</p> <p>F3: Does the site have a structural engineer's evaluation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>F4: Please give details: An occupancy permit was not available and there was no legal requirement to have a structural engineer's evaluation.</p>
G: Site function:	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Subcontractor
H: Month(s) of peak season: (if applicable)	N/A
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	Assembly, injection, packing and shipment
J: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Workers' Committee <input type="checkbox"/> Other (specify) <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 accommodations
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 type="checkbox"/> No N1: If no, please give details N/A

Audit Parameters			
A: Time in and time out	Day 1 Time in: 09:02 Day 1 Time out: 16:37 Day 1 Time in: 09:00 Day 1 Time out: 16:15	Day 2 Time in: N/A Day 2 Time out: N/A	Day 3 Time in: N/A Day 3 Time out: N/A
B: Number of auditor days used:	1 (1 auditor x 1 day)		
C: Audit type:	<input checked="" type="checkbox"/> <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: 3 weeks <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 details in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mr. Mesut AKAN / Company Owner		
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 2022/11/01		
J: Previous audit type:	N/A Initial audit		
K: Were any previous audits reviewed for this audit	<input checked="" 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

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 (only complete if no worker reps present)	N/A		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	There was no registered union or union representative at the facility.		

Worker Analysis

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

Worker Analysis								
	Local			Migrant*				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	15	0	0	2	0	0	0	17
Worker numbers – female	7	0	0	0	0	0	0	7
Total	22	0	0	2	0	0	0	24
Number of Workers interviewed – male	5	0	0	2	0	0	0	7
Number of Workers interviewed – female	3	0	0	0	0	0	0	3
Total – interviewed sample size	8	0	0	2	0	0	0	10



A: Nationality of Management	Turkish	
B: Please list the nationalities of all workers, with the three most common nationalities listed first. <i>Please add more nationalities as applicable to site. Add more rows if required.</i>	Nationalities: B1: Nationality 1: <u>Turkish</u> B2: Nationality 2: <u>Turkmenian</u> B3: Nationality 3: <u>N/A Azerbaijan</u>	Was the list completed during peak season? <input type="checkbox"/> Yes <input type="checkbox"/> No N/A as there was no obvious peak season in the facility. If no, please describe how this may vary during peak periods:
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1: <u>97%/92%</u> C1: approx % total workforce: Nationality 2: <u>3%/4%</u> C2: approx % total workforce: Nationality 3: <u>N/A/4%</u>	
D: Worker remuneration (management information)	D: <u>0%</u> workers paid at a piece rate D1: <u>100%</u> hourly paid workers D2: <u>0%</u> salaried workers Payment cycle: D3: <u>0%</u> daily paid D4: <u>0%</u> weekly paid D5: <u>100%</u> monthly paid D6: <u>0%</u> other D7: If other, please give details	



Worker Interview Summary		
A: Were workers aware of the audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
C: Number of group interviews: (Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)	1 group of 4 male employees	
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 4 / 3	D2: Female: 2 / 3
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details	
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non favourable <input type="checkbox"/> Indifferent	
H: What was the most common worker complaint?	No complaints were raised during the interviews.	
I: What did the workers like the most about working at this site?	Good location, payments were on time, peaceful working environment.	
J: Any additional comment(s) regarding interviews:	Nil	
K: Attitude of workers to hours worked:	The general attitude of the workers was relaxed and peaceful. All 10 selected employees (including 1 Turkmen and 1 Azerbaijan worker) claimed that they were satisfied with the working conditions at this facility. Furthermore, they had never been forced to work overtime. Overtime work was conducted on a voluntary basis. 2 interviewed migrant workers (Turkmen and Azerbaijan) also	

confirmed that they had not been discriminated against.

L: Is there any worker survey information available?

☐ Yes

☒ No

L1: If yes, please give details:

M: Attitude of workers:

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

Worker interviews were carried out using the protocol outlined in the SMETA Best Practice Guideline. The auditor conducted interviews with 10 workers.

The workers were asked about the ETI code of conduct principles that covered work hours, H&S conditions and provided training, payroll practices, timekeeping, employment/hiring practices, etc.

The auditor used interviews to gather information about compliance for almost all ETI Code standards and if the facility complied with legal requirements in order to assess working condition issues as well as to assess wages and hours and other elements in the Code. Interviews were conducted privately. While interviewing, the auditor tried to encourage the employee to speak freely by asking open-ended questions and tried to avoid questions that had a yes or no response.

According to the employees' testimonies, payments were made on time, they worked 9 hours a day, 45 hours a week with legal breaks given. Work hours were recorded using biometric fingerprinting attendance software. Overtime was conducted on a voluntary basis and it was not too often. No Sunday overtime had ever been conducted. No uninsured, child or union member employees were available. There were no pregnant workers. All types of wages were paid through bank transfers and social insurance premium payments accordingly. Meals were provided free of charge to all employees. The supervisors had a good attitude towards the employees. A doctor visited twice a month. H&S training sessions were conducted regularly. Fire evacuation drills were conducted once every 6 months.

The answers given by the workers confirmed the actual facility conditions based on a document review.

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

One interview was conducted with a workers' representative. Based on the representative's statement, the workers were happy to work at the facility. No serious issues were raised by the workers in the last year. The workers felt free to raise any issues if needed. Their representatives were elected via free elections and a secret voting system.

O: Attitude of managers:

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

Management was very positive during the audit and transparent in sharing information. All information and documents were shared with the auditor upon request.

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, including human rights impacts and issues.

The facility had a designated person who was responsible for implementing standards concerning Human rights.

Ms. Gamze Sariaydin was responsible for Social Compliance

The facility had a transparent system in place for confidentially reporting and dealing with human rights impacts without fear of reprisals towards the reporter.

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

Details:

Facility's Policy and procedures.

Any other comments: None

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

☒ Yes

☐ No

A1: Please give details: The facility had a policy which included human rights impacts and issues.

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

☒ Yes

☐ No

	Please give details: Name: Ms. Gamze Sariaydin Job title: Social Compliance Oversight
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: Anonymous grievance and communication mechanisms were available.
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)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: All actions were taken based on the law on the protection of personal data as required.

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

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

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: ___7___ %	A2: This year ___9___ %
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]	23%	
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: ___5___ %	C2: This year ___5___ %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	5%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Accident, no-accident and close-to records were available.	
F: Annual Number of work-related accidents and injuries per 100 workers: [(Number of work-related accidents and injuries * 100) / Number of total workers]	F1: Last year: 2021 Number: 0	F2: This year: 2022 Number: 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	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work-related injuries * 100) / Number of total workers]	H1: Last year: 2021 0	H2: This year: 2021 0
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months ___0___% workers	I2: 12 months ___0___% workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months ___0___% workers	J2: 12 months ___0___% workers

0B: Management system and Code Implementation

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

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

Current Systems and Evidence Examined

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

Current systems:

The facility appointed a senior member of management, Ms. Gamze Sariaydin (Social Compliance) to be responsible for compliance with the Ethical Code.
The Code was posted on the announcement board and communicated to the employees.
The facility communicated this code to their suppliers and, where reasonably practicable, extended the principles of this Ethical Code through their supply chains.

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

Details:

Document review

Management interview

Facility tour, Procedure reviews

Any other comments: None

Management Systems:

A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?

☐ Yes

☒ No

A1: Please give details: The site has not been subjected to any fines/prosecutions for noncompliance with any regulations for the last 12 months.

B: Do policies and/or procedures exist that reduce the risk of forced labor, child labor, discrimination, harassment & abuse?

☒ Yes

☐ No

B1: Please give details: There were policies and procedures that included reducing the risk of forced labor, child labor, discrimination and harassment.

C: If Yes, is there evidence (an indication) of effective implementation? Please give details.

The facility had its own policies which were forced labor, child labor, discrimination, harassment and

	abuse. Furthermore, they had a workers' committee which could bring all related issues into meeting with management per interviews.
D: Have managers and workers received training in the standards for forced labor, child labor, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Social compliance training sessions were regularly provided by the clients.
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: Training records were available for the auditor to review.
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please give details: There were no such certifications in the facility.
G: Is there a Human Resources manager/department? If Yes, please detail.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: The facility was a very small enterprise and the company's owner, Ms. Gamze Sariaydin, was responsible for all HR practices.
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. Gamze Sariaydin (Social Compliance)
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: A policy was set as per the law on the protection of personal data as required.
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: A procedure was set as per the law on the protection of personal data as required.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: The last risk assessment was conducted on 2021/11/08.
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 last internal audit was conducted on 2022/06/17.

M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: The facility communicated this code to 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: A rental contract was available.
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: A company lawyer informs the facility monthly on updates of local laws, regulations and rules.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: If yes, how does the company obtain FPIC? The facility had a written policy and procedures specific to land rights.
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: Not applicable. The auditee's facility was a tenant in the building and construction was finished before the rental contract began. So, the auditee's facility was not responsible to compensate any amount to the landowner. However, a deed document and a rental contract were available.
R: Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: Not applicable. The facility was a tenant in a legally recognized building in a commercial area.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details: There was no such illegal appropriation of land for the facility's building or expansion of the footprint.

Non-compliance:

<p>1. Description of non-compliance:</p> <p><input type="checkbox"/> NC against ETI/Additional Elements</p> <p><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><i>(where relevant please add photo numbers)</i></p> <p>Not applicable</p>
--	--

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

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

1: Freely Chosen Employment

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

ETI

1.1 There is no forced, bonded or involuntary prison labour.

1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

Current Systems and Evidence Examined

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

Current systems:

The facility had a policy which prohibited forced labor, and this was available for review during the document review and interviews with the workers.

There was a formalised application procedure which stated that the workers must present valid IDs for proof of age but only copies would be kept in the personnel files. The original IDs were given back to the workers. The terms and conditions of employment in the procedures stated that the workers were free to leave the workplace after their working hours.

The facility did not require any payments for work tools, PPE, IC/staff card, training, etc.

The facility did not use prison labor.

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

Details:

Policy documents

Personnel files and pay-slips

Employee interviews

Labor contracts

Any other comments: None

A: Is there any evidence of retention of original documents, e.g. passports/ID's	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, please give details and category of workers affected:
B: Is there any evidence of a loan scheme in operation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please give details and category of workers affected:
C: Is there any evidence of retention of wages /deposits	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of workers affected:
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding: Based on a review of the resignation records and worker interviews, it was noted that freedom to terminate employment was not restricted.

E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding: This was not applicable for this facility.
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the workday?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding: Based on worker interviews, the workers' freedom was not restricted.
G: Does the site understand the risks of forced / trafficked / bonded labor in its supply chain	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected: The facility had a detailed policy on modern slavery / human trafficking. No forced/trafficked/bonded labor was noted.
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labor?	<input type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: Not applicable. No forced/trafficked/bonded labor was noted. The facility required its suppliers to be audited through the SMETA, BSCI, SLCP or any other specific client programs to measure and take the required preventive steps against any risks of forced / trafficked labor.

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

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:

The facility had a policy to recognize and respect the right of employees to exercise their lawful rights of freedom of association.

The employees could freely communicate issues related to working conditions, wages & benefits, and Freedom of Association, etc., to their supervisors or management directly.

The facility established a workers' committee system with 1 elected male worker who collected information from the workers and provide this information during management meetings.

The records were available for review.

There was no union in the facility.

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

Details:

Employee interviews

Company Policy & Procedures

Labor contracts

Grievance Records: 2022/08/25

Worker representative election: 2022/08/15 – 1 male WR

WR Meeting: 2022/09/15 – 2022/06/01–2022/03/15

Any other comments: None

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

- ☐ Union (name)
- ☒ Workers' Committee
- ☐ Other (specify)
- ☐ None

B: Is it a legal requirement to have a union?

- ☐ Yes
- ☒ No

C: Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: A grievance box and an open-door policy. 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: The Workers' Representative may use the office room (there was no other applicable place in the facility).	
F: Name of union and union representative, if applicable:	No union in the facility.	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?	Workers' Committee	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	
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: 2022/08/15
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: 1 workers' representative	
L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Employee representatives can communicate with the workforce and management. They can have meetings and they can raise issues about health & safety and consider general site conditions. The last meeting was conducted on 2022/09/15.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If Yes , what percentage by trade Union/worker representation	M1: __N/A__% workers covered by Union CBA	M2: __N/A__% workers covered by worker rep CBA
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A	

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

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:

All areas were visited. During the facility walkthrough, it was clearly observed that a minimum of two emergency exit doors were available, which opened in the direction of travel for safe evacuation. Exit signs and emergency lights were installed above all exit doors.

A sufficient number of first aid kits were provided, and they had adequate amounts of medicines as required by law.

Sufficient fire-fighting equipment and fire hydrants were installed. All fire extinguishers were marked, well maintained and available with signs indicating their location.

A detailed evacuation plan was posted on the walls in each department and the areas to be kept free of obstruction were marked.

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

Details:

Reviewed documents:

General H&S Training: 2021/12/03

Risk Assessment: 2021/11/08

Emergency Action Plan: 2021/11/08

Electricity Wiring Report: 2021/12/21

Electricity Grounding Report: 2021/12/21

Indoor Measurement (Dust, Noise, Lighting, Thermal Comfort, VOC): 2021/12/20

Periodical Inspections:

Air tank, pallet jack: 2021/12/20

Good lift: 2022/09/13

Crane: 2022/09/25

Air Ventilation: 2022/08/04

First Aiders: 2 employees (1 more needed)

Fire Evacuation Drill: 2022/01/12

Annual Inspection: 2022/01/07

Hygiene Certificate: 2 employees

H&S Specialist Service Contract: 2022/06/17

Drinking Water Analyse Report: 2021/12/15

Any other comments: None

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: H&S policy and procedures were available. H&S training was conducted on a regular basis.
B: Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The Workers' Manual was provided for the auditor to review.
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: There were no structural additions without required permits in the facility.
D: Are visitors to the site informed on H&S and provided with personal protective equipment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Yes. During the opening meeting, the facility informed the auditor about H&S requirements at the facility. No PPE was needed during the facility tour.
E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The facility provided first aid kits and regular health checks. There is no legal requirement to have a medical room for facilities with less than 50 workers according to local legal regulations.
F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: The facility provided first aid kits and regular health checks. There were 2 certified first aiders, but 1 more is needed. There is no legal requirement to have a medical room for facilities with less than 50 workers according to legal regulations.
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?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: N/A – Transportation was not provided and there was no legal requirement.
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H1: Please give details: N/A. No dormitory was provided for the workers by the facility.
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: The facility conducted risk assessments and established a system to reduce any risks.

and are there controls to reduce identified risk?	
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: The facility had an environmental permit, an environmental impact assessment out of scope letter and an industrial waste management plan.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: The facility had a chemical inventory and those substances were regularly checked. The facility also had all legally required environmental permits and procedures.

Non-compliance:

1. Description of non-compliance:

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

Absence of firefighting equipment inspection report

It was noted that periodic inspections were not conducted of the provided firefighting equipment.

1st Follow up (On-site audit): Closed

Date: 2023/01/31

It was noted that the facility conducted inspections of their firefighting equipment each month.

Local law and/or ETI requirement

In accordance with Turkish Regulation about Occupational Health and Safety circumstances using work equipment (25/04/2013) No: 28628

Inspection of work equipment

Article 7 – (1) The below-mentioned issues are obeyed in controlling of work equipment used in a workplace

a) Work equipment's control is done by persons who have authorization to do periodical controls after set up and before first time set up and when change of place, document which proofs that set up is done correctly and equipment works safely.

b) Work equipment periodical controls are done by persons who have authorization to do periodic controls

c) Control results are recorded and kept as to be shown whenever authorities want

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 work environment.

Recommended corrective action:

Objective evidence observed:

1. Document review
N/A

The facility is advised to ensure that periodic inspections (annually) are conducted of their firefighting equipment.

2. Description of non-compliance:

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

Insufficient number of first aider

It was noted that the number of certified first aiders was not sufficient according to the total number of employees at the facility. There were 2 certified first aiders, but 1 more was needed.

1st Follow up (On-site audit): Closed

Date: 2023/01/31

It was noted that the facility had enough first aid trained workers. The facility had 36 employees, with 3 first aid trained workers, which complies with the legal requirement.

Local law and/or ETI requirement:

First-aid Regulation (29.07.2015), No: 29429

Obligatory first aid trained employee employment.

Article 19 - (1) At the Occupational Health and Safety Scope; It is an obligation that having

b) 1 first aider for every 15 employees for facilities at hazardous class

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

Recommended corrective action:

The facility is advised to ensure that one certified first aider is available per every 15 employees.

3. Description of non-compliance:

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

MSDS not being posted

It was noted that MSDS of the machine maintenance chemicals were not posted where chemicals were used and stored.

1st Follow up (On-site audit): Closed

Date: 2023/01/31

It was noted that the facility provided and posted MSDS where chemicals were used and stored.

Local law and/or ETI requirement:

In accordance with the Turkish Regulation on the Health and Safety Precautions Taken While Working with Chemical Substances, No: 28733, Date: 12.08.2013, Article 6; (2) The following shall be taken into consideration in risk assessments while working with chemical substances:

2. Document review

N/A

3. Facility tour

N/A

b) Turkish Material Safety Data Sheet which will be provided by the employer, importer or sellers.

Article 9; (1) The followings shall be taken into consideration while giving training or information to employees by the employer in accordance with the Regulation about Occupational Health and Safety Trainings of Employees dated 15.05.2013 - No.28648.

ç) Material Safety Data Sheets of the chemicals provided from the supplier

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

Recommended corrective action:

The facility is advised to ensure that MSDS are posted where chemicals are used and stored.

4. Description of non-compliance:

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

Damaged fire hoses

During the site tour, it was noted that 3 randomly selected fire hoses were damaged.

1st Follow up (On-site audit): Closed

Date: 2023/01/31

It was noted that all fire hoses had been repaired and were functional.

Local law and/or ETI requirement:

REGULATION ON THE PROTECTION OF BUILDINGS AGAINST FIRE

Fire Cabinets System, Article 94

b) Fire cabinets;

3) The cabinets in which hoses are kept should be in a size that allows instalment of devices. These shall be designed in a way that is not going to make usage of hoses and devices difficult and is only going to be used for fire extinguishing purposes.

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

Recommended corrective action:

The facility is advised to ensure that functional and solid fire hoses are provided on the premises.

4. Facility tour
(Photo NC #1)
N/A (Please refer to
Corrective Action
photos No #1)

5. Description of non-compliance:

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

Broken, discharged and missing emergency lighting

It was noted that one emergency light was not functional at the rear side escape stairs. The emergency lights on the 1st floor were discharged and there was no emergency lighting in the locker rooms.

1st Follow up (On-site audit): Closed

Date: 2023/01/31

It was noted that the facility replaced the non-functional emergency light at the rear side escape stairs with a new one and a new emergency light was installed on the 1st floor. In addition, the facility installed emergency lights in the men's and women's locker rooms.

Local law and/or ETI requirement:

In accordance with the Regulation on Protection of Buildings Against Fire (19.12.2007), Article 71 (1) All emergency exit routes and stairs should be illuminated.

Article 72 (1) Emergency lighting system should be automatically functional in case of electricity cut off by city electricity network or similar outside electricity supply, and electricity cut off for safety reasons such as fire and earthquakes.

The Regulation on the Health and Safety Measures Taken for Buildings and Additions (17.07.2013, No: 28710)

Appendix-1

Minimum Health and Safety Requirements for Buildings and Additions
Emergency Exit Routes and Doors

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

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

Recommended corrective action:

The facility is advised to ensure that functional emergency lights are provided on the premises where required.

6. Description of non-compliance:

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

Blocked escape aisles

It was noted that in the assembly section, the emergency escape path markings on the ground were not up to date and 2 escape paths were partially blocked by carton boxes. Also, one emergency escape path was partially blocked by carton boxes in the warehouse area on the 1st floor.

1st Follow up (On-site audit): Open

5. Facility tour

(Photo NC #2, 3)

N/A (Please refer to Corrective Action photos No #2 & 3)

6. Facility tour

(Photo NC #4)

(Please refer to Corrective Action photos No #4)

Date: 2023/01/31

It was noted that all emergency evacuation aisles were free of obstructions. However, emergency evacuation aisle markings on the floor were still not updated in the assembly section.

Local law and/or ETI requirement:

In accordance with the Regulation on Protection of Buildings Against Fire (19.12.2007), Article 31- (1) The exit way is defined as the not blocked way starting from any part of the building till the street at the ground level.
(2) Elevators cannot be accepted as an exit way.

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

Recommended corrective action:

The facility is advised to ensure that all its emergency escape paths are up to date, open and accessible.

7. Description of non-compliance:

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

Dangerous waste area

It was noted that there was an incompletely and dangerously mounted water tanker approximately 15 meters above the waste storage area.

1st Follow up (On-site audit): Closed

Date: 2023/01/31

It was noted that the facility removed the water tank located 15 meters above the waste storage area.

Local law and/or ETI requirement:

In accordance with Occupational Health and Safety Law (30/6/2012), Article 4, Employers should protect the health and safety of the employee for all subjects below related to work.

a) Prevent occupational risks, take precautions included giving training and information, make the organization, provide necessary tools and equipment, make suitable health and safety precautions to changing circumstances and make the current situation better.

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

Recommended corrective action:

The facility is advised to ensure that they have a safe working area.

7. Facility tour
(Photo NC #5)
N/A (Please refer to
Corrective Action
photos No #5)

8. Description of non-compliance:

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

Absence of construction (occupancy) permit

It was noted that a construction occupancy permit or construction registration document was not available for the facility's building.

1st Follow up (On-site audit): Closed

Date: 2023/01/31

It was noted that the facility provided the required construction registration from a local authority for review.

Local law and/or ETI requirement:

Construction Zoning Law (No: 3194) (03/05/1985), (Article 30)
Article 30

It's imperative to obtain permission from a municipality or governorship bureau which issued the construction permit, for a building using the absolute amount of, in case of building was totally finished or in the event of completed part of a construction which was designed to use.

It is required to determine a building's compliance in terms of a permit, additional documents and engineering, upon application of the owner.

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

Recommended corrective action:

The facility is advised to provide a construction occupancy permit or construction registration document.

8. Document review

N/A

Observation:

Description of observation:

None observed

Local law or ETI requirement:

Not applicable

Recommended corrective action:

Not applicable

Objective evidence observed:

Not applicable

Good Examples observed:

Description of Good Example (GE):

None observed

Objective Evidence Observed:

Not applicable

4: Child Labour Shall Not Be Used

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

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

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 had a procedure to ensure there was no hiring of child labor and management follows local legislation. At the start of employment, the workers must provide valid proof of age documentation, which is verified by making a copy of the original documentation of their Birth Certificate/ Photo ID. No child labor was identified. There was no young or child labor at the facility.

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

Details:

Ethical Trading Policy,
Child labor policy,
Action against if Child Labor found procedure,
Hiring & Recruitment procedure,
Young Worker Recruitment policy,
Employee Handbook,
Personnel Files,
Proof of Age Documentation,
Management interviews,
Worker interviews.

Any other comments: None

A: Legal age of employment:	15 years old
B: Age of youngest worker found:	18 years old
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0 %

<p>E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No E1: If yes, give details N/A as there were no young workers in the facility.</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</p> <p>Local law and/or ETI requirement: Not applicable</p> <p>Recommended corrective action: Not applicable</p>	<p>Objective evidence observed: Not applicable</p>

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

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

5: Living Wages are Paid

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

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

ETI

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

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

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

Current Systems and Evidence Examined

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

Current systems:

There were no employees paid at a rate under the legal minimum wage. Payslips were given to the employees with signatures provided for the payment period.

Wages were via bank transfers on the 5th of the following month. All employees were paid equal or more than the current, local minimum wage. Benefits, such as social insurance, annual leave, and child-bearing leave, were provided to the employees.

The country's minimum wage was 5500.35 TRY NET. The production workers' salaries were between 5750 TRY – 8000 TRY with 7200 TRY as the average net pay which is above the minimum wage.

Maternity leave, social insurance premiums and other legal benefits were provided to the employees in accordance with legal regulations. However, absent time, even if it is a minute or an hour, was deducted from the annual leave rights of the employees. Also, Saturday overtime practices were not paid based on actual work hours. Instead, a 7.5-hour-long overtime work period was paid even though the worker performed more than 7.5 hours of work.

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

Details:

10 employees' attendance and payroll records for May 2022 (random month), August 2022 (random month) and September 2022 (last paid month) were reviewed. [10 employees' attendance and payroll records for November and December 2022.](#)

Employee & management interviews

Labor contracts

Any other comments: None

Non-compliance:

1. Description of non-compliance:

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

Absent time being deducted from the annual leaves

Objective evidence observed:

1. Document review
(Photo NC #6)

It was noted that absent time (minutes and hours) was deducted from the annual leave rights of the employees.

N/A

1st Follow up (On-site audit): Closed

Date: 2023/01/31

It was noted that from a document review and management interview that absent times were not deduct from the workers' annual leaves.

Local law and/or ETI requirement:

In accordance with Turkish Labor Law - 4857; Article 56: Other kinds of leave, with or without pay, granted by the employer during the year or taken by the employee as convalescent or sick leave must not be deducted from annual leave.

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

Recommended corrective action:

The facility is advised to ensure that annual leaves are provided to the employees in compliance with local laws.

2. Description of non-compliance:

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

Saturday overtime practices are not calculated based on actual working hours

It was noted that rest day overtime practices conducted on Saturday's was calculated and paid as 7.5 hours work, even when the actual work was over 7.5 hours.

1st Follow up (On-site audit): Closed

Date: 2023/01/31

It was noted that rest day overtime practices on Saturday's were calculated and paid the same rate as normal working hours. For example, one worker worked 9.5 hours on a Saturday in November 2022 and the facility calculated and only paid the regular 9.5 hour rate to this worker.

Local law and/or ETI requirement:

In accordance with Turkish Labor Law #4857 / 2003, ARTICLE 41, Overtime is permitted for reasons such as national interests, or the basic requirements of the work or increase of production. Overtime is defined in the Law as the work hours that exceed forty-five work hours a week.

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

Recommended corrective action:

The facility is advised to ensure that all its overtime practices are paid and calculated according to the actual hours worked.

2. Document review
(Photo NC #7)
N/A

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): Meal is provided free of charge to all employees.	Objective Evidence Observed: Management and worker interviews

Summary Information

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible, per day, week, and month)	Legal maximum: 11 hours / day 45 hours/week	A1: 9 hours / day 45 hours/week	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible, per day, week, and month)	Legal maximum: 11 total work hours per day (regular + overtime), 270 overtime hours per year	B1: 12 total work hours per day (regular + overtime), 270 overtime hours per year 11 total work hours per day (regular + overtime)	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible, per hr., day, week, and month)	Legal minimum: From January 1st, 2022 to June 30th, 2022: 5004 TRY (GROSS) 4253 TRY NET / month; Since July 1st 2022: 6471 TRY (GROSS) 5500.35 TRY NET / month.	C1: The production workers' salaries were paid between 5500.35 TRY – 8000 TRY with 7200 TRY average net which is above the minimum wage.	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

		The production workers' salaries were paid between 5500.35 TRY – 7500 TRY with 6830.55 TRY as the average net which is above the minimum wage.	
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible, per hr., day, week, and month)	Legal minimum: 150% for overtime on weekdays and weekends. Overtime premium for national/religious holidays is 200% (An additional daily wage is provided for the working practices performed on national or religious holidays.)	D1: 150% for overtime on weekdays and weekends. Overtime premium for national/religious holidays is 200% (An additional daily wage is provided for the working practices performed on national or religious holidays.) There was no rest day (Sunday) and holiday work observed.	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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
A1: If No , why not?	N/A	
B: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	10 employees' attendance and payroll records for May 2022 (random month), August 2022 (random month) and September 2022 (last paid month) were reviewed. 10 employees' attendance and payroll records for November and December 2022 were reviewed.	
C: Are there different legal minimum wage grades? If Yes , please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	C1: If Yes , please give details:

D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	D1: If No , please give details:	
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month, etc.</i> The production workers' salaries were paid between 5500.35 TRY – 8000 TRY with 7200 TRY being the average net salary which is above the minimum wage. The production workers' salaries were between 5500.35 TRY – 7500 TRY with 6830.55 TRY as the average net which is above the minimum wage.	
F: Please indicate the breakdown of workforce per earnings:	F1: <u> 0 </u> % of workforce earning under minimum wage F2: <u> 20 </u> % of workforce earning minimum wage F3: <u> 80 </u> % of workforce earning above minimum wage		
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month, etc.</i> N/A		
H: What deductions are required by law e.g. social insurance? Please state all types:	Social insurance fees and personal income tax were deducted.		
I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that have been made.	1. Social insurance fee 2. Income Tax Please describe: Social insurance premiums and income taxes. Both of these were basic deductions which legally applied to all employees.
		I2: Please list all deductions that have not been made.	N/A
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	K1: Type <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	
L: Do records reflect all time worked? (For instance, are workers asked to	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

attend meetings before or after work but not paid for their time)	L1: Please give details: All work hours were reflected in the time records.
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time:
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details: N/A
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: The facility reviewed the workers' salaries every year based on local minimum wage increases.
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: Through a facility rules review, a payroll records review and worker interviews, it was confirmed that equal rates were being paid for equal work.
Q: How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfers <input type="checkbox"/> Other Q1: If other, please explain:

6: Working Hours are not Excessive

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

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

ETI

6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Subclauses 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:

The facility worked one shift as follows:

7:45-18:00 with a 45-minute lunch break and two 15-minute mid-breaks from Monday to Friday.

Biometric fingerprinting attendance software was used for work time recording. 10 employees' attendance and payroll records for May 2022 (random month), August 2022 (random month) and September 2022 (last paid month) were reviewed. [10 employees' attendance and payroll records for November and December 2022 were reviewed.](#) In case of weekday overtime, an additional 30-minute-long meal break was provided to the employees. No rest day work was noted.

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

Details:

The attendance records of employees were reviewed.

Interviews were conducted with employees and management.

Any other comments: None

Non-compliance:

1. Description of non-compliance:

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

Daily working practices exceeding 11 hours

It was noted that 6 out of 10 randomly selected employees worked max. 12 hours in a day for max. once in September 2022.

1st Follow up (On-site audit): Closed

Date: 2023/01/31

It was noted that 10 randomly selected employees did not work more than 11 hours daily.

Local law and/or ETI requirement:

In accordance with the Turkish Regulation on Working Hours Related to Labor Law, Article 4. In general, at most the duration of work shall be 45 hours a week. This period shall be applied by dividing equally among the days of the week worked, unless the opposite is concluded. Daily work hours shall not exceed 11 hours a day in any case.

ETI 6.1 Work hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for the workers.

Recommended corrective action:

The facility is advised to ensure that their daily work hour practices, including overtime, are limited to 11 hours.

Objective evidence observed:

Document review
(Photo NC #8)

Observation:

Description of observation:

None observed

Local law or ETI requirement:

Not applicable

Comments:

Not applicable

Objective evidence observed:

Not applicable

Good Examples observed:

Description of Good Example (GE):

None observed

Objective Evidence Observed:

Not applicable

Working hours' analysis Please include time e.g. hour/week/month (Go back to Key information)			
Systems & Processes			
A. What timekeeping systems are used: timecards, etc.	Describe: Biometric fingerprinting		
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details		
C: Are standard/contracted working hours defined in all contracts/employment agreements?	<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: N/A	
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D1: If YES, please complete as appropriate:	
		<input type="checkbox"/> 0 hrs <input type="checkbox"/> Part time <input type="checkbox"/> Variable hrs <input type="checkbox"/> Other	
		If "Other", Please define:	
		N/A	
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E1: If yes , please detail hours, %, types of workers affected and frequency Please give details: N/A	
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	Maximum number of days worked without a day off (in sample):		
	6 days		

Standard/Contracted Hours worked		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency: N/A
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details: N/A
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: May 2022: 2 hours / day, 8 hours / week, 15 hours / month August 2022: 2 hours / day, 9 hours / week, 16 hours / month September 2022: 3 hours / day, 14 hours / week, 15 hours / month. November 2022: 0 to 2 hours / day, 0 to 9 hours / week, 0 to 11 hours / month December 2022: 0 to 2 hours / day, 0 to 4 hours / week, 0 to 6 hours / month	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No The maximum weekly hours worked were 59 hours. The maximum weekly hours worked were 54 hours.	
K: Approximate percentage of total workers on highest overtime hours:	___20___%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Worker interviews
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of standard wages: Payment for overtime on a regular day: 150% of normal rate Payment for working on a holiday and rest day: 200% of normal rate No rest day (Sunday) and Holiday work was observed.
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	N1: If yes, please describe % of workers & frequency: All employees, Monthly

<p>O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.</p>	<div> <input checked="" type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other </div> <div> <p>O1: Please explain any checked boxes above e.g. details of consolidated pay / CBA or Other</p> </div> <div> <p>N/A</p> </div>
<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>	<div> <input type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify) </div> <div> <p>N/A The maximum weekly working schedule was 59 hours. The maximum weekly work schedule was 54 hours.</p> </div> <div> <p>P1: Please explain any checked boxes above e.g. details of consolidated pay / CBA or other:</p> </div> <div> <p>N/A</p> </div>
<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>	<div> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No </div> <div> <p>Q1: If yes, please give details:</p> </div>
<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>	<div> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No </div>

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:

The site had policies in place to ensure there was no discrimination in any of its procedures or practices. The gender and ethnic balance between workers and middle management was unevenly split. The facility communicated its discrimination and equal opportunities policy to the workers during their induction process and it was available in the employee handbook. The facility did not require unnecessary medical or pregnancy tests during recruitment or after hiring.

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

Details:

Ethical Trading Policy,
Recruitment and employment procedures,
Discrimination Policy,
Attendance Records,
Payroll Records,
Employee Handbook,
Contract of Employment,
Management and Worker Interviews.

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: __45__ % 40% A2: Female __55__ % 60%
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	N/A – No technical roles were available in the facility.
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination was found

	C1: Please give details: No evidence
--	--------------------------------------

Professional Development	
A: What type of training and development are available for workers?	Health and Safety trainings

B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details:
--	---

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

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:

The workers were on permanent contracts. All contracts provided were found to be compliant with local law.

The workers and the facility did sign contracts and the workers kept copies of the contract. The facility did not have any apprenticeship schemes. The workers confirmed that they knew what the notice period they must give based on their contract. There was no child, young, casual, piece-rate, apprentice, pregnant or any other classified employee at the facility.

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

Details:

Ethical Trading Policy,

Working time Regulations,

Time Records,

Payroll Records,

Contracts of Employment,

Personnel Files,

Management and Worker Interviews.

10 Personnel files and employment contracts

Any other comments: The one migrant worker at the facility was not invited for a worker interview because he was absent on the audit day. However, this worker was added into the audit scope within the frame of work hours, wages and benefits and employment practices.

2 migrant workers were working at the facility. The auditor conducted individual meetings with both migrant workers. There were no discrimination issues found.

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:
None observed

Local law and/or ETI requirement:

Not applicable

Recommended corrective action:

Not applicable

Objective evidence observed:

Not applicable

Observation:

Description of observation:

None observed

Local law or ETI requirement:

Not applicable

Comments:

Not applicable

Objective evidence observed:

Not applicable

Good Examples observed:

Description of Good Example (GE):

None observed

Objective Evidence Observed:

Not applicable

Responsible Recruitment

All Workers

A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they the same as current conditions?

- ☒ Terms & Conditions presented
- ☒ Understood by workers
- ☒ Same as actual conditions

	A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please describe details and specific category(ies) of workers affected:
C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between workplace 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:
D: If any checked, give details:	N/A

Migrant Workers: <i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i>		
A: Type of work undertaken by migrant workers:	Assembly worker Assembly worker and warehouse worker	
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: 0 B2: Total number of (outside of local country) recruitment agencies used: 0	
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: N/A	C2: Observations: There were no voluntary deductions.

<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>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>D1: If yes, number and example of roles:</p>
---	---

NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: If yes, check all that apply:	<div style="list-style-type: none;"> <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 checked="" type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input checked="" 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 workplace 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 </div> <p>B1 – If other, please give details:</p>
C: If any checked, give details:	<p>Medical screenings were conducted for all employees including migrant workers and they were paid for by the facility. In addition, all work permits for migrant workers were paid by the facility.</p>

Agency Workers (if applicable)	
<p><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></p>	
A: Number of agencies used (average):	A1: Names if available: N/A
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A

C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A D1: Please give details:
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A E1: Please give details:

Contractors: <i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i>	
A: Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, how many contractors are present, please give details:
B: If Yes , how many workers supplied by contractors?	N/A
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: N/A
D: If Yes , please give evidence for contractor workers being paid per law:	N/A

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:

No Subcontractors or homeworkers were used by the facility.

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

Details:

Facility tour

Management interview

10 employees were randomly selected for interviews.

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:

Local law or ETI/Additional elements requirement: Not applicable Comments: Not applicable	Not applicable
--	----------------

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

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

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:		
B: Number of homeworkers	B1: Male:	B2: Female:	Total:
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents		C1: If through agents, number of agents:

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

9: No Harsh or Inhumane Treatment is Allowed

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

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 Labor 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: The facility's customer had hotlines with an email address and phone numbers posted on the announcement board.
B: If Yes , are workers aware of these channels and have access? Please give details.	It was noted during interviews that the workers were aware of the grievance boxes.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Open door policy and grievance boxes
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: Within the framework of the social compliance practices of the company's clients, grievance mechanisms were established for the employees.
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

I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?

☐ Yes
☒ No

II: If yes, please give details

Current Systems and Evidence Examined

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

Current systems:

The facility established a policy on Harsh Treatment to prevent bullying and harassment. The disciplinary procedure was Verbal Warnings, Written Warnings, Final Written Warning and Dismissal. The disciplinary procedures were communicated in a separate document.

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

Details:

Discrimination Policy,
Disciplinary procedure,
Grievance procedure,
Training Records,
Management and Worker Interviews.

Any other comments: None

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:
None observed

Local law and/or ETI requirement:

Not applicable

Recommended corrective action:

Not applicable

Objective evidence observed:

Not applicable

Observation:

Description of observation:

None observed

Local law or ETI requirement:

Not applicable

Comments:

Not applicable

Objective evidence observed:

Not applicable

Good Examples observed:

Description of Good Example (GE):

None observed

Objective Evidence Observed:

Not applicable

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

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

Additional Elements

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

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

Current Systems and Evidence Examined

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

Current systems:

A detailed Migrant Employment policy was available and provided for the auditor to review. There was only one Turkmen and one Azerbaijan worker. A legal work permit, social insurance registration, employment contract, training records, medical examination records, time records and payroll documents were provided, and no violations were noted.

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

Details:

Recruitment procedure,
Personnel files,
Photographic Identification,
Management and Worker Interviews,
Labor contracts,
Facility tour.

Any other comments: None

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:
None observed

Local law and/or ETI requirement:

Not applicable

Recommended corrective action:

Not applicable

Objective evidence observed:

Not applicable

Observation:

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

10. Other issue areas 10B2: Environment 2–Pillar

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

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

10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.

10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements. Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.

Current Systems and Evidence Examined

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

Current systems:

The facility had an environmental policy which included identification of environmental impacts of their site and its processes. An environmental impact assessment, environmental permit and wastewater discharge permit were available for the auditor to review.

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

Details:

Reviewed Documents:

Environmental Policy and Procedures

Waste Control procedures.

Any other comments: None

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:
None observed

Local law and/or ETI requirement:

Not applicable

Recommended corrective action:

Not applicable

Objective evidence observed:

Not applicable

Observation:

Description of observation: None observed Local law or ETI/additional elements requirement: Not applicable Comments: Not applicable	Objective evidence observed: Not applicable
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Good examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed: Not applicable

Other findings

Other Findings Outside the Scope of the Code
None

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

Appendix 1

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


☒ Not Applicable please x

Photo Form




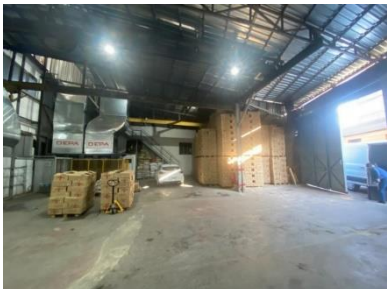


Non-Compliance Photos:

		
<p>NC #1 Damaged Fire Hose</p>	<p>NC #2 Emergency lighting not available in the locker room</p>	<p>NC #3 Emergency lighting not functional</p>
		
<p>NC #4 Blocked escape aisle</p>	<p>NC #5 Dangerously mounted water tank in a waste area</p>	<p>NC #6 Deductions from annual leaves</p>
		
<p>NC #7 Saturday overtime paid 7.5 hours instead of 9 hours</p>	<p>NC #8 Daily work schedule including overtime exceeding 11 hours</p>	

Corrective Action Photos:

		
<p>#1 Repaired fire hose</p>	<p>#2 Emergency lighting installed in the locker rooms</p>	<p>#3 Emergency lighting was functional</p>
		
<p>#4 Escape aisle was free of obstructions</p>	<p>#5 Uninstalled dangerously mounted water tank in a waste area</p>	

General Photos:

		
<p>Facility building</p>	<p>Assembly & packing section</p>	<p>Injection section</p>
		

Shipment section	Warehouse	Announcement board
Assembly point	Grievance box	Canteen
Drinking water	Emergency exit door	Eye washing facility
Fire extinguisher	First aid kit	Waste collecting area
Locker room	Evacuation map	Time recording device

		
Toilet		



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