



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC408720423	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS409175323	
Business name (Company name):	HITIT CERAMIC			
Site name:	HITIT CERAMIC			
Site address:	ORGANIZE SANAYI BÖLGESİ 101.CAD NO:1 Uşak 64100 TR	Country:	TR	
Site contact and job title:	OZGUR SARUHAN / PRODUCTION MANAGER			
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar	<input checked="" type="checkbox"/> Business Ethics
Date of Audit:	2023-07-05			

Audit Company Name:
Intertek Turkey

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

Auditor Team			
Lead Auditor:	MELIS OKTAY	APSCA Number:	32200319
Additional Auditors:	SARE KARSIT		
Date of declaration:	2023-07-06		

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.

Site Representation	
Full Name:	OZGUR SARUHAN
Title:	PRODUCTION MANAGER
Date of declaration:	2023-07-06
Comments:	<p><i>Any exceptions to this must be recorded here (e.g. different sample size):</i> <i>Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020).</i> <i>The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives</i></p>
	NONE

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
<u>0A - Universal rights covering UNGP</u>	0.A.4		0	2	0	Obs - ZAF600093207 Obs - ZAF600093214
<u>0B - Management systems and code implementation</u>	0.B.4 0.B.4 0.B.5	§1	2	1	0	NC - ZAF600093212 NC - ZAF600105720 Obs - ZAF600093208
<u>1 - Freely chosen employment</u>			0	0	0	
<u>2 - Freedom of association and right to collective bargaining are respected</u>			0	0	0	
<u>3 - Working conditions are safe and hygienic</u>	3.1 3.1 3.1 3.1	§2	4	0	0	NC - ZAF600093206 NC - ZAF600093209 NC - ZAF600093211 NC - ZAF600105708
<u>4 - Child labour shall not be used</u>	4.4	§3	1	0	0	NC - ZAF600105711
<u>5 - Living wages are paid</u>	5.3	§4	1	0	8	NC - ZAF600105707 GE - ZAF600105712 GE - ZAF600105713 GE - ZAF600105714 GE - ZAF600105715 GE - ZAF600105716 GE - ZAF600105717 GE - ZAF600105718 GE - ZAF600105719
<u>6 - Working hours are not excessive</u>	6.6 6.6	§5 §6	2	0	0	NC - ZAF600105709 NC - ZAF600105710
<u>7 - No discrimination is practiced</u>			0	0	0	
<u>8 - Regular employment is provided</u>			0	0	0	
<u>8A - Subcontracting and homeworking</u>			0	0	0	
<u>9 - No harsh or inhumane treatment is allowed</u>			0	0	0	
<u>10A - Entitlement to work and immigration</u>			0	0	0	
<u>10B2 - Environment 2-pillar</u>			0	0	0	
<u>10B4 - Environment 4-pillar</u>			0	0	0	
<u>10C - Business ethics 4-pillar</u>			0	0	0	

Local Law Issues

Issue	Description
§1	Regulation for facility opening and operating permit (10/8/2005), II. Section Art 6 (Changed first clause: 19/3/2007 – 2007/11882 K.) – It is not allowed that the facility are not opened and operated without “Opening and Operating Permit” that is taken from local authorities properly

§2	In accordance with the Regulation on Protection Of Buildings Against Fire (19.12.2007), Art. 95; (3) External fire hydrant systems shall cover entire premises of the buildings and the distance between two outside hydrants shall be 50 meter for high risky areas, 100 meters for risky areas, 125 meter for low risky areas and 150 meters for non risky areas. (4)In normal conditions, external fire hydrants shall be installed 5 to 15 meters away from the building (6)All fire hydrants shall be maintained in accordance with Turkish Standards. (7)External fire hydrants shall be installed around all establishments which have surrounding field area of 5000 squaremeters or more in total.
§3	Turkish Labour Law # 4857 / 2003, ARTICLE 71-The working hours of the minors who completed elementary education but stopped education, shall not be more than 7 hours a day and 35 hours a week. However, these period may be increased to 8 hours a day and 40 hours a week for the minors completed the age of 15.
§4	Turkish Labor Law: Article 38 - The employer cannot impose a wage cut penalty to the worker, except for the reasons stated in the collective agreement or employment agreements. The deductions to be made as a penalty from the wages of the workers must be notified to the worker immediately, together with the reasons.
§5	In accordance with the Turkish Regulation on the Occupational which are carried out by working of employees on shifts , art 9 The employees who work in shift should have at least 11 hours uninterrupted rest.
§6	Turkish Labour Law # 4857 / 2003, ARTICLE 46-The workers employed in the working places within the scope of this Law are granted at least twenty-four hours uninterrupted relaxation period (weekly holiday) within seven days' time scale provided that they have executed worked during the working days fixed according to article 63. Turkish Labour Law # 4857 / 2003, ARTICLE 63- In general the duration of work shall be at the most 45 hours a week. This period shall be applied by dividing the same equally among the days of the week worked

Site Details

Site Details		
Company Name	HITIT CERAMIC	
Site Name	HITIT CERAMIC	
GPS location (if available)	GPS Address:	ORGANIZE SANAYI BILGESI 101. CADDE NO:1 USAK
	Coordinates:	Latitude: 38.673467, Longitude: 29.197818
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	The workplace opening and operating permit 13.10.2014 dated and 2014/27 numbered covers 9164 m2. This is a permanent permit, no validity date. Please also refer to NC.	
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	The products of company are porcelain, wall tile and floor tile.	
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	The company was established in 1989 and it has been operating since then. The company is a producer of ceramic based products.	

Structure and number of buildings	Building Name:		Administrative Building no #1
	Floor	Description	Remark
	Ground Floor	Lunch hall , infirmary and offices	None
	Basement Floor	Meeting rooms, boiler room	None
	Building Name:		Production Building no #2
	Floor	Description	Remark
	Ground Floor	Design, product design and decorative production (not active)	None
	1st floor	Warehouse for finished goods	None
	Building Name:		Production Building no #3
	Floor	Description	Remark
	Ground Floor	Production of porcelain lines, offices, maintenance rooms.	None
	Building Name:		Production Building no #4
	Floor	Description	Remark
	Ground Floor	Production of floor tile, offices.	None
	Building Name:		Production Building no #5
	Floor	Description	Remark
	Ground Floor	Production of wall tile, offices.	None
	Building Name:		Production Building no #6
	Floor	Description	Remark
	Ground Floor	Maintenance Rooms	None
Building Name:		Production Building no #7	
Floor	Description	Remark	
Ground Floor	Unoccupied	None	
Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No cracks are observed.		
Does the site have a structural engineer evaluation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has construction permit.		

Site function	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack house <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-contractor
Months of peak season	Select a month to Select a month
Process overview	The main processes of the company are; Preparation, pressing, printing, decorative applications, heat application with furnaces, shaping, packing and shipping. Blending machine: 8 Spray dryer: 3 Press machines: 7 Furnaces: 5 Decorative application lines: 3 Packing lines: 5
What form of worker representation is there on site?	<input checked="" type="checkbox"/> Union <input type="checkbox"/> Worker Committee <input type="checkbox"/> Other <input type="checkbox"/> None
Please give details:	There is a trade union named as CIMSE-IS Sendikası at the site.
Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any on site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Were all site provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is no accommodation building at this facility.

Audit Parameters				
Time in and time out	Day 1		Day 2	
	In	09:15	In	08:30
	Out	17:30	Out	17:30
Audit type:	PERIODIC			
Was the audit announced?	ANNOUNCED			
Was the Sedex SAQ available for review?	Yes			
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No			
Who signed and agreed CAPR	OZGUR SARUHAN / PRODUCTION MANAGER			
Is further information available	No			

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	No	No
B: Present at the audit?	Yes	No	Yes
C: Present at the closing meeting?	Yes	No	No
<i>Reason for absence at the opening meeting</i>	There are 3 Union Representatives at the facility. 1 Union representative is included in the employee interview. Union representatives could not attend the opening and closing meeting because of the intensity of the production. //Tesinde 3 adet Sendika Temsilcisi bulunmaktadır. Çalışan görüşmesine 1 sendika temsilcisi dahil edilmiştir. Açılış ve kapanış toplantısına üretim yoğunluğu nedeniyle sendika temsilcileri katılamadı.		
<i>Reason for absence during the audit</i>	There are 3 Union Representatives at the facility. 1 Union representative is included in the employee interview.//Tesinde 3 adet Sendika Temsilcisi bulunmaktadır. Çalışan görüşmesine 1 sendika temsilcisi dahil edilmiştir.		
<i>Reason for absence at the closing meeting</i>	There are 3 Union Representatives at the facility. 1 Union representative is included in the employee interview. Union representatives could not attend the opening and closing meeting because of the intensity of the production. //Tesinde 3 adet Sendika Temsilcisi bulunmaktadır. Çalışan görüşmesine 1 sendika temsilcisi dahil edilmiştir. Açılış ve kapanış toplantısına üretim yoğunluğu nedeniyle sendika temsilcileri katılamadı.		

Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – male	430	0	5	0	0	0	0	435
Worker numbers – female	34	0	4	0	0	0	0	38
Total	464	0	9	0	0	0	0	473
Number of Workers interviewed – male	19	0	0	0	0	0	0	19
Number of Workers interviewed – female	7	0	0	0	0	0	0	7
Total – interviewed sample size	26	0	0	0	0	0	0	26

Nationalities Structure	
Nationality of Management	Turkish
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1: TURKISH approx %: 100%
Was this list completed during peak season?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Production at this facility is stable. There is no change in the number of employees depending on the increase in production.
Worker remuneration	Workers on piece rate: 0%
	Paid hourly: 100%
	Salaried: 0%
Payment cycle	Paid daily: 0%
	Paid weekly: 0%
	Paid monthly: 100%
	Other: 0%
	Details for other: NA

Worker Interview Summary	
Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Number of group interviews:	Group interviews are conducted with 20 employees as 4 group of 5 employees.
Number of individual interviews:	Male: 4 Female: 2
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
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
In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favorable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
What was the most common worker complaint?	None.
What did the workers like the most about working at this site?	Payments on time, management attitude.
Any additional comment(s) regarding interviews:	None.
Attitude of workers to hours worked:	They are happy regarding working hours.
Is there any worker survey information available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

Attitude of workers:
The general attitude of the employees was positive. Social insurance and payment on time were the positive issues raised by the employees. There is no discrimination, harassment, abuse or forced labour.
Attitude of worker's committee/union reps:
No negative comment was noted during the union representative interviews.
Attitude of managers:
Management was helpful and transparent during the audit process.

0A - Universal Rights covering UNGP
[Summary of Findings]

0A: Compliance Requirements

- 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 has a policy, endorsed at the highest level, covering human rights impacts and issues, and ensures it is communicated to all appropriate parties, including its own suppliers.
Social compliance responsible is authorized: MUSTAFA KAYA –MANAGEMENT SYSTEMS COORDINATOR.
The facility has a designated person responsible for implementing standards concerning Human rights.
All can communicate any issue directly.

Evidence examined:

- Social compliance policy and related procedures
- Authorization letter of social compliance responsible
- Grievance Mechanism Feedbacks
- Management interview
- Employee interviews

Any other comments:

None.

Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has detailed social compliance policy that includes human rights.
Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All policies and procedures are contained in the Employee Handbook.
Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: MUSTAFA KAYA Job title: MANAGEMENT SYSTEMS COORDINATOR

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 Please give details: The facility has suggestion box placed at several places.
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
Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has detailed privacy procedures for worker's information. Also, the feedbacks getting from suggestion boxes are evaluated by the management in a confidential way.
Measuring Workplace Impact	
Annual worker turnover(Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	Last year 16.0% This year 5.26%
Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	3.79%
Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	Last year 0.007% This year 0.003%
Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month)	0.005%
Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All accidents are recorded in the facility.
Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year 2.4% This year 5.6%
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)	0.01%

Lost day work cases per 100 workers($\frac{\text{Number of lost days due to work accidents and work related injuries} * 100}{\text{Number of total workers}}$)	Last year	31.76%
	This year	9.01%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%

Observation		Evidence
[Back to findings summary]		
Observation		
Status	CLOSED	
Reference	ZAF600093207	
Clause	0A - Universal Rights covering UNGP	
Issue Title	29 - No / inadequate management awareness of the social and ethical standards required / ETI base code	
Subcategory	Site's Awareness of Code/Legal Requirements	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA414613038	
Resolved by audit	ZAA600015425	
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	N/A	
ETI code	0.A.4 - Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.	
Explanation to the observation	The facility does not measure the direct, indirect and potential impact on its stakeholders' human rights	
Actions	N/A	
Additional comments	The facility does measure the direct, indirect and potential impact on its stakeholders' human rights The facility does measure the direct, indirect and potential impact on its stakeholders' human rights	

Observation		Evidence
[Back to findings summary]		
Observation		
Status	CLOSED	
Reference	ZAF600093214	
Clause	0A - Universal Rights covering UNGP	
Issue Title	37 - The ethical Code (i.e. ETI Base Code for SMETA audits) is not communicated to the site's own suppliers	
Subcategory	Site's Systems to Manage Supplier Compliance	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA414613038	
Resolved by audit	ZAA600015425	
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	N/A	
Explanation to the observation	The facility does not monitor adverse impact on its stakeholders.	
Actions	N/A	
Additional comments	The facility monitor adverse impact on its stakeholders. The facility monitor adverse impact on its stakeholders.	

0B - Management Systems and code Implementation
[Summary of Findings]

0B: Compliance Requirements

- 0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.
- 0.B.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.
- 0.B.3 Suppliers are expected to communicate this Code to all employees.
- 0.B.4 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.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 has disciplinary procedures and work rules. All posted onsite.
 All social compliance issues are managed and monitored internally.
 The employees have information regarding social compliance, social and legal rights.
 The facility management has already posted ETI Base code on notice boards.
 Overall responsibility for meeting the standards is taken by MUSTAFA KAYA – MANAGEMENT SYSTEMS COORDINATOR

Evidence examined:

Management interview
 Employees' interviews
 Training records
 Company policies

Any other comments:

None

Management Systems

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

Yes No

Please give details:

NA.

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

Yes No

Please give details:

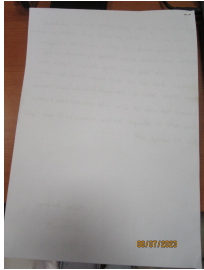
Policies and procedures about reducing the risk of forced labour, child labour, discrimination and harassment & abuse are in place.

<p>If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>Policies exist for all areas (Forced labour, Health and Safety, Wages, Working Hours, and No harsh treatment, Environment, Business Ethics, Child Labour, Recruitment, Discrimination and Sub-contracting.), these are communicated to workers via poster and annual training.</p> <p>Through documents review and workers interview, policy on 'No harsh treatment and Environment' was fully in compliance with the code.</p> <p>Workers stated no forced labour, no child labour was found (through interview and document checks), there were both female and male among management/supervisors.</p>
<p>Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>These policy and procedures are communicated to the all staff through posters and also communicated as a part of orientation training.</p>
<p>If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Training records are available.</p>
<p>Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has ISO 9001, ISO 14001, OHSAS 45001, EPD-TSE-GREENGUARD-UPEC certification but the expiry dates are not provided.</p>
<p>Is there a Human Resources manager/department?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Name: Mesut Yıldırım Job Title: Human Resources Manager</p>
<p>Is there a senior person /manager responsible for implementation of the code?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Name: Mustafa Kaya Job Title: Management Systems Coordinator</p>
<p>Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>All worker information is kept on their personnel files. These files are kept on Administration office.</p>
<p>Is there an effective procedure to ensure confidential information is kept confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>All worker information is kept on their personnel files. These files are kept on Administration office. There is also a Confidentiality Policy.</p>
<p>Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Health and Safety Risk assessment includes policy and procedures effectiveness.</p>

<p>Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility performs a corrective action plan for the findings that addressed on risk assessment.</p>
<p>Does the facility have a policy/code which require labour standards of its own suppliers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has choosing and evaluating procedure for its suppliers.</p>
<p>Land Rights</p>	
<p>Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>Please refer to NC.</p>
<p>Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>Please refer to NC.</p>
<p>Does the site have a written policy and procedures specific to land rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has environmental impact assessment. The facility main production processes is not risky regarding land rights.</p>
<p>Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility is a contractor in a building where all the floors are occupied by production facilities.</p>
<p>Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>There is no land acquisition. In case a land acquisition, the facility applies to municipality and fulfil the obligations regarding environmental impact assessment, construction permit etc.</p>
<p>Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>No such issue observed. All legal papers available to demonstrate compliance.</p>

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	CLOSED	
Reference	ZAF600093212	
Clause	0B - Management Systems and code Implementation	
Issue Title	34 - Site is operating without all required in-date licences and permits (e.g. business / factory licence has expired)	
Subcategory	Site's licenses & Certifications	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA414613038	
Resolved by audit	ZAA600015425	
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	N/A	
ETI code	0.B.4 - 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.	
Explanation to the non compliance	It was noted that workplace opening and operating permit 13.10.2014 dated and 2014/27 numbered covers 9164 m2. As per remaining building usage permits the areas that might be issued for opening permit was 48640 m2. Remaining permit do not cover the whole areas of the company.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input checked="" type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	N/A	
Additional comments	NC was not closed NC was not closed	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600105720	
Clause	0B - Management Systems and code Implementation	
Issue Title	34 - Site is operating without all required in-date licences and permits (e.g. business / factory licence has expired)	
Subcategory	Site's licenses & Certifications	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Regulation for facility opening and operating permit (10/8/2005), II. Section Art 6 (Changed first clause: 19/3/2007 – 2007/11882 K.) – It is not allowed that the facility are not opened and operated without “Opening and Operating Permit” that is taken from local authorities properly	
ETI code	O.B.4 - 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.	
Explanation to the non compliance	It was noted that workplace opening and operating permit 13.10.2014 dated and 2014/27 numbered covers 9164 m2. As per remaining building usage permits the areas that might be issued for opening permit was 48640 m2. Remaining permit do not cover the whole areas of the company. // 13.10.2014 tarih ve 2014/27 sayılı işyeri açma ve çalıştırma ruhsatının 9164 m2'yi kapsadığı kaydedildi. Kalan yapı kullanma izinlerine göre iş yeri açma ve çalıştırma ruhsatı verilebilecek alan 48640 m2'dir. Kalan izinler şirketin tüm alanlarını kapsamamaktadır.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	Please provide business license for all areas at the facility.//Lütfen tesisteki tüm alanlar için iş yeri açma ve çalıştırma ruhsatı sağlayınız.	

Observation		Evidence																														
[Back to findings summary]																																
<table border="1"> <thead> <tr> <th colspan="2">Observation</th> </tr> </thead> <tbody> <tr> <td>Status</td> <td>CLOSED</td> </tr> <tr> <td>Reference</td> <td>ZAF600093208</td> </tr> <tr> <td>Clause</td> <td>0B - Management Systems and code Implementation</td> </tr> <tr> <td>Issue Title</td> <td>687 - The ethical Code (i.e. ETI Base Code for SMETA audits) is not communicated to the site's employees</td> </tr> <tr> <td>Subcategory</td> <td>Site's Awareness of Code/Legal Requirements</td> </tr> <tr> <td>New or carried over?</td> <td><input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over</td> </tr> <tr> <td>Raised by audit</td> <td>ZAA414613038</td> </tr> <tr> <td>Resolved by audit</td> <td>ZAA600015425</td> </tr> <tr> <td>Root cause</td> <td> <input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other </td> </tr> <tr> <td>Root cause - Other</td> <td>N/A</td> </tr> <tr> <td>ETI code</td> <td>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.</td> </tr> <tr> <td>Explanation to the observation</td> <td>ETI Base code was not announced to the suppliers and subcontractors.</td> </tr> <tr> <td>Actions</td> <td>N/A</td> </tr> <tr> <td>Additional comments</td> <td>ETI Base code was announced to the suppliers and subcontractors. ETI Base code was announced to the suppliers and subcontractors.</td> </tr> </tbody> </table>		Observation		Status	CLOSED	Reference	ZAF600093208	Clause	0B - Management Systems and code Implementation	Issue Title	687 - The ethical Code (i.e. ETI Base Code for SMETA audits) is not communicated to the site's employees	Subcategory	Site's Awareness of Code/Legal Requirements	New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	Raised by audit	ZAA414613038	Resolved by audit	ZAA600015425	Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	Root cause - Other	N/A	ETI code	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.	Explanation to the observation	ETI Base code was not announced to the suppliers and subcontractors.	Actions	N/A	Additional comments	ETI Base code was announced to the suppliers and subcontractors. ETI Base code was announced to the suppliers and subcontractors.	 <p><u>IMG_6635.JPG</u></p>
Observation																																
Status	CLOSED																															
Reference	ZAF600093208																															
Clause	0B - Management Systems and code Implementation																															
Issue Title	687 - The ethical Code (i.e. ETI Base Code for SMETA audits) is not communicated to the site's employees																															
Subcategory	Site's Awareness of Code/Legal Requirements																															
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over																															
Raised by audit	ZAA414613038																															
Resolved by audit	ZAA600015425																															
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other																															
Root cause - Other	N/A																															
ETI code	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.																															
Explanation to the observation	ETI Base code was not announced to the suppliers and subcontractors.																															
Actions	N/A																															
Additional comments	ETI Base code was announced to the suppliers and subcontractors. ETI Base code was announced to the suppliers and subcontractors.																															

1 - Freely chosen Employment
[Summary of Findings]

1: Compliance Requirements
 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:

Overtime works are not mandatory.
 Employees have free access to toilets, drinkable water.
 Employees are free to leave the facility at the end of their shifts.
 No deposits were required.
 Employees are free to keep their identity papers.
 The facility does not limit the employees’ freedom.
 Movement of employees at the facility is not prohibited or limited.
 There is no forced, bonded or involuntary prison labour.
 There was a formalised application procedure which states that workers must present their ID’s for proof of age but that only copies must be kept in the personnel files and the original given back to the workers.

Evidence examined:

Personnel files
 Hiring documents
 Management and worker interview
 Employee handbook
 Factory rules

Any other comments:

None.

Is there any evidence of retention of original documents, e.g. passports/ID’ (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any restrictions on workers’ freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: NA.
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 type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details: NA

<p>Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: NA</p>
<p>Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable</p> <p>Please give details: The facility has a detailed procedure regarding this issue.</p>
<p>Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: The facility has a detailed procedure regarding this issue includes reducing the risk of forced/trafficked labour.</p>

2 - Freedom of Association and Right to Collective Bargaining are Respected
[Summary of Findings]

2: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

They have open door policy and suggestion box.
There is T.CIMSE-IS. as trade union.
Union membership is not prohibited.
There were also 3 worker representatives freely elected by workers in the facility.

Evidence examined:

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

Any other comments:

None.

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	<input checked="" type="checkbox"/> Union <input checked="" type="checkbox"/> Other <input type="checkbox"/> Worker Committee <input type="checkbox"/> None
Other details:	There is T.CIMSE-IS. as trade union. Open door policy, suggestion boxes.
Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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 Please give details: Employees declared that they can go directly to the management for their suggestions whenever they want. In addition to this, suggestion box is placed.
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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 Please give details: Yes, there is a meeting area for union.

Name of union and union representative, if applicable:	T.CIMSE-IS – TEKSTIL SENDIKASI, YUKSEL CELIK (lead representative)
Is there evidence of free elections?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	There are 3 worker representatives, open door policy and suggestion boxes in the facility.
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All employees are aware of who their representatives are.
Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date of last election:	2020-01-15
Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, please state how many:	1.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Periodical meetings were performed. Meeting noted were shared with the attendances.
Are any workers covered by Collective Bargaining Agreement (CBA)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, what percentage by trade Union/worker representation	100% workers covered by Union CBA. 0% workers covered by worker rep CBA.
If Yes, does the Collective Bargaining Agreement (CBA) include rates of pay?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

3 - Working Conditions are Safe and Hygienic
[Summary of Findings]

3: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

1. General Health and Safety management

- Potable water was freely available in all areas.
- Sufficient number of clean toilets which were segregated by gender were available at all times to workers.
- Health certificates for kitchen operators and the hygiene certificate for the kitchen was up-to-date and legal.
- Risk assessment is available.
- Emergency case plans were provided inside the facility.
- Emergency evacuation plans were provided in the facility
- Injury records are kept by facility.
- Minutes of meetings meet regularly between the H&S committee (workers) and the H&S manager, and each point is acted on.

2. Fire Safety

- There were at least 2 exits from each work area and these were clearly marked.
- Firefighting equipment was adequate and checks were up-to-date.
- Fire drills were organised and recorded annually.
- Training had been given by fire marshals had been specially selected for extra training.

3. Electrical safety

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

4. Chemical safety

- Each chemicals were labled properly.

5. Medical services


- There were adequate first aid kits in each production area and they were well stocked.
- There are contracted occupational doctor and OHS expert.


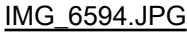
Evidence examined:


<ul style="list-style-type: none"> -Health and safety policy -Health and safety manual -Health and safety committee minutes -Training records and certificates -Fire equipment maintenance records -Fire drill records -Government licenses and checks on dust, thermal comfort, illumination and noise level -Accident reports -Sanitation permit for kitchen -Health certificates for kitchen staff -Potable water testing certificates -Interviews with H&S manager -Interviews with workers and H&S committee members
<p>Any other comments:</p>
<p>None.</p>

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 Please give details: The facility has Health & Safety Procedures and these procedures are shared with employees via trainings.
Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has a detailed Health & Safety procedure and this procedure is explained in Health and Safety trainings to employees.
Are there any structural additions without required permits/inspections (e.g. floors added)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Please refer to NC.
Are visitors to the site informed on H&S and provided with personal protective equipment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: This information is provided by H&S specialist.
Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has a separate room that meets legal requirement.
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 Please give details: There are enough first aiders (49 employee) and an infirmary in the company premises. First aid boxes were also located at different sections. First aiders' contact numbers were also posted on the noticeboards.
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Worker transportation is provided by the facility. Maintenance and controls of transportation are checked regularly.

<p>Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: There is no accommodation.</p>
<p>Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: The risk assessment has working hours section.</p>
<p>Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: The facility exemption letter of environmental permit.</p>
<p>Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: No banned chemical is used by the facility.</p>

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	CLOSED	
Reference	ZAF600093206	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	240 - No / inadequate safety measures / anti-explosion measures for chemicals (e.g. no anti-leaking system / secondary container / unbunded)	
Subcategory	Chemicals	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA414613038	
Resolved by audit	ZAA600015425	
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	N/A	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	It was noted that no restriction was available through chemical storage area and temporary storage areas. No secondary containments were available.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	N/A	
Additional comments	İKİNCİL KAP UYGULAMASI It was noted that restriction was available through chemical waste area . Secondary containments were available. It was noted that restriction was available through chemical waste area . Secondary containments were available.	
		 IMG_6378.JPG

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	CLOSED	
Reference	ZAF600093209	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	195 - Emergency notification system (e.g. fire alarm) is not set up to notify all workers at the site, including on multiple floors	
Subcategory	Fire Safety - Fire alarms & Evacuation	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA414613038	
Resolved by audit	ZAA600015425	
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	N/A	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	It was noted that early fire warning system do not cover the whole areas of the buildings of the company. Remaining systems only cover the furnaces lines and box warehouse.	
Follow up method	<input checked="" type="checkbox"/> Follow up audit <input type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input checked="" type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	N/A	
Additional comments	It was noted that early fire warning system cover the whole areas of the buildings of the company. It was noted that early fire warning system cover the whole areas of the buildings of the company.	
		 

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	CLOSED	
Reference	ZAF600093211	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	193 - Fire alarms / smoke detectors in place but isolated case of non-functional equipment	
Subcategory	Fire Safety - Fire alarms & Evacuation	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA414613038	
Resolved by audit	ZAA600015425	
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	N/A	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	During the trial performed on the audit date, fire alarm was turned off when alarm button was released and no time relay was available. There is no visual alarm system.	
Follow up method	<input checked="" type="checkbox"/> Follow up audit <input type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input checked="" type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	N/A	
Additional comments	Fire alarm worked during the facility tour and it was hearable from all areas. Fire alarm worked during the facility tour and it was hearable from all areas.	
		 <u>IMG_6595.JPG</u>

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600105708	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	186 - Firefighting equipment is not sufficient to address type or severity of risk	
Subcategory	Fire Safety - Fire Fighting Equipment	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	<p>In accordance with the Regulation on Protection Of Buildings Against Fire (19.12.2007), Art. 95; (3) External fire hydrant systems shall cover entire premises of the buildings and the distance between two outside hydrants shall be 50 meter for high risky areas, 100 meters for risky areas, 125 meter for low risky areas and 150 meters for non risky areas. (4)In normal conditions, external fire hydrants shall be installed 5 to 15 meters away from the building (6)All fire hydrants shall be maintained in accordance with Turkish Standards. (7)External fire hydrants shall be installed around all establishments which have surrounding field area of 5000 squaremeters or more in total.</p>	
ETI code	<p>3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p>	
Explanation to the non compliance	<p>The closed area of the facility is 80000 square meters. According to the management statement and the facility tour, there is no external hydrant in the facility. // İşletme kapalı alanı 80 bin metrekaredir. Yönetim beyanı ve yapılan saha turuna göre, işletmede dış hidrant bulunmamaktadır.</p>	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	

Actions	Please provide the facility with an external hydrant system. // Lütfen işletmeye dış hidrant sistemi sağlayınız.	
---------	--	--

4 - Child Labour Shall Not Be Used
[Summary of Findings]

- 4: Compliance Requirements
 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 youngest permanent employee is 15 years old. (apprentice)
 No historical child labour was noted during the documents review.
 Employees' personnel files include recent photo and the age documentation, which is in the form of photocopied ID card. The card lists the employee's name, household address and the date of birth.

Evidence examined:

Personnel files (ID Card copy records)
 Time card & Wage records
 Employee interviews
 Facility tour was conducted

Any other comments:

None.

Legal age of employment:	18
Age of youngest worker found:	15
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
Percentage of under 18's at this site (of total workers)	0.2%
Are workers under 18 subject to hazardous work assignments?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is no hazardous work assignment.

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600105711	
Clause	4 - Child Labour Shall Not Be Used	
Issue Title	403 - Apprentices / trainees / vocational workers are employed under terms and conditions contrary to law	
Subcategory	Young Workers - Hours of Work	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Turkish Labour Law # 4857 / 2003, ARTICLE 71-The working hours of the minors who completed elementary education but stopped education, shall not be more than 7 hours a day and 35 hours a week. However, these period may be increased to 8 hours a day and 40 hours a week for the minors completed the age of 15.	
ETI code	4.4 - These policies and procedures shall conform to the provisions of the relevant ILO Standards.	
Explanation to the non compliance	According to the document review, the apprentice working time in the facility was not determined in accordance with the local law. The 15-year-old apprentice working hours was exceed 40 hours in a week. (45 hours in a week.)// Belge incelemesine göre, tesiste çırak çalışma süresi yerel yasalara göre belirlenmemiştir. 15 yaşındaki çırakın çalışma saatleri haftada 40 saati aşmaktadır. (Haftada 45 saat.)	
Follow up method	<input checked="" type="checkbox"/> Follow up audit <input type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	Please provide that apprentice working hours complies with local law. (8 hrs/day, 40 hrs/week) // Lütfen çırak çalışma süresinin yerel yasalara uygun (8 saat/gün, 40 saat/hafta) olmasını sağlayınız.	

5 - Living Wages are Paid
[Summary of Findings]

5: Compliance Requirements

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:

Payments of the employee were done between 5th to 15th of each month via bank accounts with fully registration to Social Security Foundation.

The overtime wages are paid to the employees correctly as required by law.

Payslip is given to the employees.

All workers were registered to social insurance scheme.

Annual leaves are used by the employees properly.

There was no employee under the legal minimum wage.

At least legal minimum wage was paid to all workers

Since January 1st, 2022: 4253,40 TL (Net- including subsistence allowance) / month

Since July 1st, 2022: 5500,35 TL (Net- including subsistence allowance) / month

Since January 1st, 2023: 8506,80 TL (Net- including subsistence allowance) / month

Payment Period: Monthly

26 employees' attendance records and payroll records of May 2023 (last paid month), January 2023 (random month) and November 2022 (random month) were reviewed.

Evidence examined:

Payment records

Time records

Social insurance records

Employee interviews

Leave records

Any other comments:

None.

Summary Information

Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: null Per Week: 45.0 Per Month: null	Actual Per Day: 8.0 Per Week: 45.0 Per Month: 225.0	YES
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 11.0 Per Week: null Per Month: null	Actual Per Day: 3.0 Per Week: 7.0 Per Month: 15.0	YES

Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: 8506.8	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 8506.8	YES
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: null	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 0.0	YES
Wages Analysis:			
Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
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)	26 employees' attendance records and payroll records of May 2023 (last paid month), January 2023 (random month) and November 2022 (random month) were reviewed.		
Are there different legal minimum wage grades? If Yes, please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
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"/> Not Applicable Please give details:		
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 checked="" type="checkbox"/> Meet <input checked="" type="checkbox"/> Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	8506.80		
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 4.0% of workforce earning minimum wage 96.0% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	<p>Bonus Scheme found: Bonus payments were done to employees as per their attendance during the month for each month</p> <p>Bonus payments were done to employees on March, June, September and December month according to their performance levels.</p> <p>Additional payments of 250 TL, 300 TL, 400 TL, 500 TL, 600 TL and 700TL gross were paid respectively to employees whose seniorities were reached to 5, 10, 15, 20, 25 and 30 years.</p> <p>Additional social support payment of 340 TL Gross were done to employees in each month. Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</p>		
What deductions are required by law e.g. social insurance? Please state all types:	Social insurance and taxes		
Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Please list all deductions that have been made.	1.TAX 2.SOCIAL INSUARANCE		

Please list all deductions that have not been made.	NA.
Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: It was verified with interviews that all worked times were reflected on the provided records.
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
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 <input type="checkbox"/> Other – please give details:
Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: It was confirmed with worker interviews and document review (time-payment records).
How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other

Non-Compliance		Evidence																												
[Back to findings summary]																														
<table border="1"> <thead> <tr> <th colspan="2">Non-Compliance</th> </tr> </thead> <tbody> <tr> <td>Status</td> <td>OPEN</td> </tr> <tr> <td>Reference</td> <td>ZAF600105707</td> </tr> <tr> <td>Clause</td> <td>5 - Living Wages are Paid</td> </tr> <tr> <td>Issue Title</td> <td>414 - Pay deducted for disciplinary measures (e.g. lateness, absenteeism, disciplinary warnings, errors in production etc.) - isolated</td> </tr> <tr> <td>Subcategory</td> <td>Deductions</td> </tr> <tr> <td>New or carried over?</td> <td> <input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over </td> </tr> <tr> <td>Root cause</td> <td> <input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other </td> </tr> <tr> <td>Root cause - Other</td> <td></td> </tr> <tr> <td>Local law issue</td> <td>Turkish Labor Law: Article 38 - The employer cannot impose a wage cut penalty to the worker, except for the reasons stated in the collective agreement or employment agreements. The deductions to be made as a penalty from the wages of the workers must be notified to the worker immediately, together with the reasons.</td> </tr> <tr> <td>ETI code</td> <td>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.</td> </tr> <tr> <td>Explanation to the non compliance</td> <td>According to the management statement, employee interview and document review, it has been determined that employees have been deducted from their salaries due to quality errors in production. This deduction is a maximum of 2 days wage deduction. Apart from the deductions mentioned in the contract, deductions are also made for quality errors. These deductions are deposited into the account of the Ministry of Labor and Social Security in accordance with the law. // Yönetim beyanı, çalışan görüşmesi ve doküman incelemesine göre, çalışanların üretimdeki yapmış olduğu kalite hatalarından dolayı maaşlarından kesinti yapıldığı tespit edilmiştir. Bu kesinti maksimum 2 günlük yevmiye kesintisidir. Sözleşmede geçen kesintilerin dışında kalite hatalarından ayrıca kesinti yapılmaktadır. Bu kesintiler kanuna uygun şekilde Çalışma ve Sosyal Güvenlik Bakanlığı'nın hesabına yatırılmaktadır.</td> </tr> <tr> <td>Follow up method</td> <td> <input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit </td> </tr> <tr> <td>Timescale</td> <td> <input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days </td> </tr> </tbody> </table>		Non-Compliance		Status	OPEN	Reference	ZAF600105707	Clause	5 - Living Wages are Paid	Issue Title	414 - Pay deducted for disciplinary measures (e.g. lateness, absenteeism, disciplinary warnings, errors in production etc.) - isolated	Subcategory	Deductions	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	Root cause - Other		Local law issue	Turkish Labor Law: Article 38 - The employer cannot impose a wage cut penalty to the worker, except for the reasons stated in the collective agreement or employment agreements. The deductions to be made as a penalty from the wages of the workers must be notified to the worker immediately, together with the reasons.	ETI code	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.	Explanation to the non compliance	According to the management statement, employee interview and document review, it has been determined that employees have been deducted from their salaries due to quality errors in production. This deduction is a maximum of 2 days wage deduction. Apart from the deductions mentioned in the contract, deductions are also made for quality errors. These deductions are deposited into the account of the Ministry of Labor and Social Security in accordance with the law. // Yönetim beyanı, çalışan görüşmesi ve doküman incelemesine göre, çalışanların üretimdeki yapmış olduğu kalite hatalarından dolayı maaşlarından kesinti yapıldığı tespit edilmiştir. Bu kesinti maksimum 2 günlük yevmiye kesintisidir. Sözleşmede geçen kesintilerin dışında kalite hatalarından ayrıca kesinti yapılmaktadır. Bu kesintiler kanuna uygun şekilde Çalışma ve Sosyal Güvenlik Bakanlığı'nın hesabına yatırılmaktadır.	Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days	
Non-Compliance																														
Status	OPEN																													
Reference	ZAF600105707																													
Clause	5 - Living Wages are Paid																													
Issue Title	414 - Pay deducted for disciplinary measures (e.g. lateness, absenteeism, disciplinary warnings, errors in production etc.) - isolated																													
Subcategory	Deductions																													
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over																													
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other																													
Root cause - Other																														
Local law issue	Turkish Labor Law: Article 38 - The employer cannot impose a wage cut penalty to the worker, except for the reasons stated in the collective agreement or employment agreements. The deductions to be made as a penalty from the wages of the workers must be notified to the worker immediately, together with the reasons.																													
ETI code	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.																													
Explanation to the non compliance	According to the management statement, employee interview and document review, it has been determined that employees have been deducted from their salaries due to quality errors in production. This deduction is a maximum of 2 days wage deduction. Apart from the deductions mentioned in the contract, deductions are also made for quality errors. These deductions are deposited into the account of the Ministry of Labor and Social Security in accordance with the law. // Yönetim beyanı, çalışan görüşmesi ve doküman incelemesine göre, çalışanların üretimdeki yapmış olduğu kalite hatalarından dolayı maaşlarından kesinti yapıldığı tespit edilmiştir. Bu kesinti maksimum 2 günlük yevmiye kesintisidir. Sözleşmede geçen kesintilerin dışında kalite hatalarından ayrıca kesinti yapılmaktadır. Bu kesintiler kanuna uygun şekilde Çalışma ve Sosyal Güvenlik Bakanlığı'nın hesabına yatırılmaktadır.																													
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit																													
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days																													

	<input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	Please do not deduct wages from workers other than the reasons stated in the employment contract and/or collective bargaining agreement.//Lütfen iş sözleşmesi ve/veya toplu iş sözleşmesinde gösterilen sebepler dışında işçilerden ücret kesintisi yapmayınız.	

Good Example		Evidence																		
[Back to findings summary]																				
<table border="1"><thead><tr><th colspan="2">Good Example</th></tr></thead><tbody><tr><td>Status</td><td>OPEN</td></tr><tr><td>Reference</td><td>ZAF600105712</td></tr><tr><td>Clause</td><td>5 - Living Wages are Paid</td></tr><tr><td>Issue Title</td><td>429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport</td></tr><tr><td>Subcategory</td><td>Benefits & Insurance</td></tr><tr><td>New or carried over?</td><td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td></tr><tr><td>Explanation to the good example</td><td>Meal and transportation are provided free of charge to all employees.//Yemek ve servis tüm çalışanlara ücretsiz olarak sağlanmaktadır.</td></tr><tr><td>Evidence</td><td>Management and employee interview, document review//Yönetim ve çalışan görüşmesi, döküman incelemesi</td></tr></tbody></table>		Good Example		Status	OPEN	Reference	ZAF600105712	Clause	5 - Living Wages are Paid	Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	Subcategory	Benefits & Insurance	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Explanation to the good example	Meal and transportation are provided free of charge to all employees.//Yemek ve servis tüm çalışanlara ücretsiz olarak sağlanmaktadır.	Evidence	Management and employee interview, document review//Yönetim ve çalışan görüşmesi, döküman incelemesi	
Good Example																				
Status	OPEN																			
Reference	ZAF600105712																			
Clause	5 - Living Wages are Paid																			
Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport																			
Subcategory	Benefits & Insurance																			
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over																			
Explanation to the good example	Meal and transportation are provided free of charge to all employees.//Yemek ve servis tüm çalışanlara ücretsiz olarak sağlanmaktadır.																			
Evidence	Management and employee interview, document review//Yönetim ve çalışan görüşmesi, döküman incelemesi																			

Good Example		Evidence																		
[Back to findings summary]																				
<table border="1"><thead><tr><th colspan="2">Good Example</th></tr></thead><tbody><tr><td>Status</td><td>OPEN</td></tr><tr><td>Reference</td><td>ZAF600105713</td></tr><tr><td>Clause</td><td>5 - Living Wages are Paid</td></tr><tr><td>Issue Title</td><td>429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport</td></tr><tr><td>Subcategory</td><td>Benefits & Insurance</td></tr><tr><td>New or carried over?</td><td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td></tr><tr><td>Explanation to the good example</td><td>Bonus payments were done to employees as per their attendance during the month for each month //Firmada çalışanlara işe devamlılığı göre her ay prim ödenmektedir.</td></tr><tr><td>Evidence</td><td>Worker, management interview and document review//İşçi, yönetim görüşmesi ve döküman incelemesi</td></tr></tbody></table>		Good Example		Status	OPEN	Reference	ZAF600105713	Clause	5 - Living Wages are Paid	Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	Subcategory	Benefits & Insurance	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Explanation to the good example	Bonus payments were done to employees as per their attendance during the month for each month //Firmada çalışanlara işe devamlılığı göre her ay prim ödenmektedir.	Evidence	Worker, management interview and document review//İşçi, yönetim görüşmesi ve döküman incelemesi	
Good Example																				
Status	OPEN																			
Reference	ZAF600105713																			
Clause	5 - Living Wages are Paid																			
Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport																			
Subcategory	Benefits & Insurance																			
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over																			
Explanation to the good example	Bonus payments were done to employees as per their attendance during the month for each month //Firmada çalışanlara işe devamlılığı göre her ay prim ödenmektedir.																			
Evidence	Worker, management interview and document review//İşçi, yönetim görüşmesi ve döküman incelemesi																			

Good Example		Evidence																		
[Back to findings summary]																				
<table border="1"><thead><tr><th colspan="2">Good Example</th></tr></thead><tbody><tr><td>Status</td><td>OPEN</td></tr><tr><td>Reference</td><td>ZAF600105714</td></tr><tr><td>Clause</td><td>5 - Living Wages are Paid</td></tr><tr><td>Issue Title</td><td>429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport</td></tr><tr><td>Subcategory</td><td>Benefits & Insurance</td></tr><tr><td>New or carried over?</td><td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td></tr><tr><td>Explanation to the good example</td><td>Bonus payments were done to employees on March, June, September and December month according to their performance levels. //Firmada çalışanların performanslarına göre Mart, Haziran, Eylül ve Aralık aylarında prim ödemeleri yapılmaktadır.</td></tr><tr><td>Evidence</td><td>Worker, management interview and document review</td></tr></tbody></table>		Good Example		Status	OPEN	Reference	ZAF600105714	Clause	5 - Living Wages are Paid	Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	Subcategory	Benefits & Insurance	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Explanation to the good example	Bonus payments were done to employees on March, June, September and December month according to their performance levels. //Firmada çalışanların performanslarına göre Mart, Haziran, Eylül ve Aralık aylarında prim ödemeleri yapılmaktadır.	Evidence	Worker, management interview and document review	
Good Example																				
Status	OPEN																			
Reference	ZAF600105714																			
Clause	5 - Living Wages are Paid																			
Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport																			
Subcategory	Benefits & Insurance																			
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over																			
Explanation to the good example	Bonus payments were done to employees on March, June, September and December month according to their performance levels. //Firmada çalışanların performanslarına göre Mart, Haziran, Eylül ve Aralık aylarında prim ödemeleri yapılmaktadır.																			
Evidence	Worker, management interview and document review																			

Good Example		Evidence																		
[Back to findings summary]																				
<table border="1"> <thead> <tr> <th colspan="2">Good Example</th> </tr> </thead> <tbody> <tr> <td>Status</td> <td>OPEN</td> </tr> <tr> <td>Reference</td> <td>ZAF600105715</td> </tr> <tr> <td>Clause</td> <td>5 - Living Wages are Paid</td> </tr> <tr> <td>Issue Title</td> <td>429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport</td> </tr> <tr> <td>Subcategory</td> <td>Benefits & Insurance</td> </tr> <tr> <td>New or carried over?</td> <td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td> </tr> <tr> <td>Explanation to the good example</td> <td>Fuel payments of net 2350 TL /YEAR were aid to employees.//Firmada çalışanlara net 2350 TL/YIL yakacak yardımı yapılmaktadır.</td> </tr> <tr> <td>Evidence</td> <td>Worker, management interview and document review</td> </tr> </tbody> </table>		Good Example		Status	OPEN	Reference	ZAF600105715	Clause	5 - Living Wages are Paid	Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	Subcategory	Benefits & Insurance	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Explanation to the good example	Fuel payments of net 2350 TL /YEAR were aid to employees.//Firmada çalışanlara net 2350 TL/YIL yakacak yardımı yapılmaktadır.	Evidence	Worker, management interview and document review	
Good Example																				
Status	OPEN																			
Reference	ZAF600105715																			
Clause	5 - Living Wages are Paid																			
Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport																			
Subcategory	Benefits & Insurance																			
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over																			
Explanation to the good example	Fuel payments of net 2350 TL /YEAR were aid to employees.//Firmada çalışanlara net 2350 TL/YIL yakacak yardımı yapılmaktadır.																			
Evidence	Worker, management interview and document review																			

Good Example		Evidence																		
[Back to findings summary]																				
<table border="1"> <thead> <tr> <th colspan="2">Good Example</th> </tr> </thead> <tbody> <tr> <td>Status</td> <td>OPEN</td> </tr> <tr> <td>Reference</td> <td>ZAF600105716</td> </tr> <tr> <td>Clause</td> <td>5 - Living Wages are Paid</td> </tr> <tr> <td>Issue Title</td> <td>429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport</td> </tr> <tr> <td>Subcategory</td> <td>Benefits & Insurance</td> </tr> <tr> <td>New or carried over?</td> <td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td> </tr> <tr> <td>Explanation to the good example</td> <td>Republic stamped gold to 700 TL net amounts were paid additionally in the case of marriage, birth and death to employees. //Firmada evlenme, doğum ve ölüm gibi durumlarda çalışanlara Cumhuriyet altını ile 700 TL net aralığında ek ödeme yapılmaktadır.</td> </tr> <tr> <td>Evidence</td> <td>Worker, management interview and document review</td> </tr> </tbody> </table>		Good Example		Status	OPEN	Reference	ZAF600105716	Clause	5 - Living Wages are Paid	Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	Subcategory	Benefits & Insurance	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Explanation to the good example	Republic stamped gold to 700 TL net amounts were paid additionally in the case of marriage, birth and death to employees. //Firmada evlenme, doğum ve ölüm gibi durumlarda çalışanlara Cumhuriyet altını ile 700 TL net aralığında ek ödeme yapılmaktadır.	Evidence	Worker, management interview and document review	
Good Example																				
Status	OPEN																			
Reference	ZAF600105716																			
Clause	5 - Living Wages are Paid																			
Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport																			
Subcategory	Benefits & Insurance																			
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over																			
Explanation to the good example	Republic stamped gold to 700 TL net amounts were paid additionally in the case of marriage, birth and death to employees. //Firmada evlenme, doğum ve ölüm gibi durumlarda çalışanlara Cumhuriyet altını ile 700 TL net aralığında ek ödeme yapılmaktadır.																			
Evidence	Worker, management interview and document review																			

Good Example		Evidence
[Back to findings summary]		
Good Example		
Status	OPEN	
Reference	ZAF600105717	
Clause	5 - Living Wages are Paid	
Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	
Subcategory	Benefits & Insurance	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Explanation to the good example	Additional payments of 250 TL, 300 TL, 400 TL, 500 TL, 600 TL and 700TL gross were paid respectively to employees whose seniorities were reached to 5, 10,15, 20, 25 and 30years. // Firmada kıdemleri 5, 10, 15, 20, 25 VE 30 yıla ulaşan çalışanlara sırası ile brut olarak 250 TL, 300 TL, 400 TL, 500TL, 600 TL ve 700 TL ek ödemeler yapılmaktadır.	
Evidence	Worker, management interview and document review	

Good Example		Evidence																		
<p>[Back to findings summary]</p> <table border="1"> <thead> <tr> <th colspan="2">Good Example</th> </tr> </thead> <tbody> <tr> <td>Status</td> <td>OPEN</td> </tr> <tr> <td>Reference</td> <td>ZAF600105718</td> </tr> <tr> <td>Clause</td> <td>5 - Living Wages are Paid</td> </tr> <tr> <td>Issue Title</td> <td>429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport</td> </tr> <tr> <td>Subcategory</td> <td>Benefits & Insurance</td> </tr> <tr> <td>New or carried over?</td> <td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td> </tr> <tr> <td>Explanation to the good example</td> <td>Additional social support payment of 340 TL Gross were done to employees in each month. // Frimada çalışanlara aylık 340 TL Brüt sosyal yardım ücreti ödenmektedir.</td> </tr> <tr> <td>Evidence</td> <td>Worker, management interview and document review</td> </tr> </tbody> </table>		Good Example		Status	OPEN	Reference	ZAF600105718	Clause	5 - Living Wages are Paid	Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	Subcategory	Benefits & Insurance	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Explanation to the good example	Additional social support payment of 340 TL Gross were done to employees in each month. // Frimada çalışanlara aylık 340 TL Brüt sosyal yardım ücreti ödenmektedir.	Evidence	Worker, management interview and document review	
Good Example																				
Status	OPEN																			
Reference	ZAF600105718																			
Clause	5 - Living Wages are Paid																			
Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport																			
Subcategory	Benefits & Insurance																			
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over																			
Explanation to the good example	Additional social support payment of 340 TL Gross were done to employees in each month. // Frimada çalışanlara aylık 340 TL Brüt sosyal yardım ücreti ödenmektedir.																			
Evidence	Worker, management interview and document review																			

Good Example		Evidence																		
<p>[Back to findings summary]</p> <table border="1"> <thead> <tr> <th colspan="2">Good Example</th> </tr> </thead> <tbody> <tr> <td>Status</td> <td>OPEN</td> </tr> <tr> <td>Reference</td> <td>ZAF600105719</td> </tr> <tr> <td>Clause</td> <td>5 - Living Wages are Paid</td> </tr> <tr> <td>Issue Title</td> <td>429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport</td> </tr> <tr> <td>Subcategory</td> <td>Benefits & Insurance</td> </tr> <tr> <td>New or carried over?</td> <td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td> </tr> <tr> <td>Explanation to the good example</td> <td>Additional coupons were given to employees in November amount of 230 TL for garments, in May and October amount of 310 TL for shoes // Frimada çalışanlara Kasım ayında 230 TL giyim için, Mayıs ve Ekim aylarında 310 TL ayakkabı kuponu verilmemektedir.</td> </tr> <tr> <td>Evidence</td> <td>Worker, management interview and document review</td> </tr> </tbody> </table>		Good Example		Status	OPEN	Reference	ZAF600105719	Clause	5 - Living Wages are Paid	Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	Subcategory	Benefits & Insurance	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Explanation to the good example	Additional coupons were given to employees in November amount of 230 TL for garments, in May and October amount of 310 TL for shoes // Frimada çalışanlara Kasım ayında 230 TL giyim için, Mayıs ve Ekim aylarında 310 TL ayakkabı kuponu verilmemektedir.	Evidence	Worker, management interview and document review	
Good Example																				
Status	OPEN																			
Reference	ZAF600105719																			
Clause	5 - Living Wages are Paid																			
Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport																			
Subcategory	Benefits & Insurance																			
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over																			
Explanation to the good example	Additional coupons were given to employees in November amount of 230 TL for garments, in May and October amount of 310 TL for shoes // Frimada çalışanlara Kasım ayında 230 TL giyim için, Mayıs ve Ekim aylarında 310 TL ayakkabı kuponu verilmemektedir.																			
Evidence	Worker, management interview and document review																			

6 - Working Hours are not Excessive
[Summary of Findings]

6: Compliance Requirements

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

Regular weekly working hours of non-shift system are arranged as;
From 08:00 to 17:00 including 1-hour total breaks for 5 days.
From 08:00 to 13.00 x including 1-hour break for Saturdays.

Regular weekly working hours of shift system. (For production employees)

08:00 - 16:00 including 30' meal break for 6 days.
16:00 - 24:00 including 30' meal break for 6 days.
00:00 - 08:00 including 30' meal break for 6 days.

Digital card activated computer data base system was used to record ingress and egress hours of employees.

Evidence examined:

Time records
Payroll records
Attendance records of employees
Management interview
Employee interviews

Any other comments:

None.

Working hours' analysis

Systems & Processes

What timekeeping systems are used?	Digital card activated computer data base system was used to record ingress and egress hours of employees.
------------------------------------	--

Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
--	---

Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input checked="" type="checkbox"/> No (please explain)
Please give details	Please refer to NC.
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):	15
Standard/Contracted Hours worked	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No % of workers: null% Frequency:
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Overtime Hours worked	
Actual overtime hours worked in sample (State per day/week/month)	3 hrs/day, 7 hrs/week, 15 hrs/month in May 2023 (last payment) 3 hrs/day, 6 hrs/week, 11.5 hrs/month in January 2023 (random moth) 2 hrs/day, 4 hrs/week, 7.5 hrs/month in November 2022 (random month)
Combined hours (standard or contracted + overtime hours = total) over 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: NA
Approximate percentage of total workers on highest overtime hours:	1.5%
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information Please give details: Proper production planning were used to replace the workers who refused to work overtime. (Worker interview)
Overtime premium	

<p>Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium</p> <p>Please give details: 150% for overtime in weekdays and rest days. Overtime premium for national/religious holidays is 200%.</p>
<p>Is overtime paid at a premium?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>150% for overtime in weekdays and rest days. Overtime premium for national/religious holidays is 200%.</p>
<p>If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.</p>	<p><input checked="" type="checkbox"/> No <input type="checkbox"/> Consolidated pay <input type="checkbox"/> Collective Bargaining agreements</p> <p><input type="checkbox"/> Other</p>
<p>Please give details</p>	<p>NA</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. (Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other)</p>	<p><input type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week is voluntary <input type="checkbox"/> Safeguards are in place to protect worker's health and safety</p> <p><input type="checkbox"/> Site can demonstrate exceptional circumstances <input checked="" type="checkbox"/> Other reasons (please specify)</p>
<p>Please give details</p>	<p>There is no practice over 60 hours – “other reason” is selected to due to technical reasons in system.</p>
<p>Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other</p>	<p>NA.</p>
<p>Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600105709	
Clause	6 - Working Hours are not Excessive	
Issue Title	493 - Rest breaks between shifts are not taken as required - systemic	
Subcategory	Rest breaks and rest days	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	In accordance with the Turkish Regulation on the Occupational which are carried out by working of employees on shifts , art 9 The employees who work in shift should have at least 11 hours uninterrupted rest.	
ETI code	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.	
Explanation to the non compliance	<p>According to the time-payment records analysis, 2 out of 26 employees in January 2023, 4 out of 26 employees in May 2023, 1 out of 26 employees in November 2022, sampled among production employees, worked without a break (11 hours) between shifts, for a maximum of 1 time has been observed. // Yapılan zaman - ödeme kayıtları incelemelerine göre, üretim çalışanlarında örneklenen Ocak 2023 ayında 26 çalışandan 2 sinde, Mayıs 2023 ayında 26 çalışandan 4 ünde, Kasım 2022 ayında 26 çalışandan 1 inde, max 1 kere olmak üzere vardiyalar arası (11 saat) ara vermeden çalışma yapıldığı gözlemlenmiştir.</p>	
Follow up method	<input checked="" type="checkbox"/> Follow up audit <input type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	Please ensure that employees take a break of at least 11 hours between shifts. // Lütfen çalışanların vardiyalar arası en az 11 saat ara vermelerini sağlayınız.	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600105710	
Clause	6 - Working Hours are not Excessive	
Issue Title	485 - Workers do not take off 1 day in 7, and this is contrary to law or collective bargaining agreement (CBA) – systemic	
Subcategory	Rest breaks and rest days	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Turkish Labour Law # 4857 / 2003, ARTICLE 46-The workers employed in the working places within the scope of this Law are granted at least twenty-four hours uninterrupted relaxation period (weekly holiday) within seven days' time scale provided that they have executed worked during the working days fixed according to article 63. Turkish Labour Law # 4857 / 2003, ARTICLE 63- In general the duration of work shall be at the most 45 hours a week. This period shall be applied by dividing the same equally among the days of the week worked	
ETI code	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.	
Explanation to the non compliance	It was noted that some of employees work on their weekly holiday in the peak seasons. (all sections) In May 2023; 6 out of 26 employees max: 2 time max: 14 consecutive days In January 2023; 3 out of 26 employees max: 2 time min: 7, max: 8 consecutive days In November 2022; 8 out of 26 employees max: 2 times min:7, max: 15 consecutive days//Çalışanların bir kısmının yoğun sezonlarda haftalık tatillerinde çalıştıkları kaydedildi. (tüm bölümler) Mayıs 2023'te; 26 çalışandan 6'sı maks: 2 kez maks: ardışık 14 gün Ocak 2023'te; 26 çalışandan 3'ü max: 2 kez min: 7, max: 8 ardışık gün Kasım 2022'de; 26 çalışandan 8'i max: 2 kez min:7, max: 15 ardışık gün	
Follow up method	<input checked="" type="checkbox"/> Follow up audit <input type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/>	

	365 days	Other	
Actions	Please provide a rest day at least 24 hours, after every 6 consecutive days of working. // Lütfen her 6 gün ardışık çalışmadan sonra en az 24 saat dinlenme süresi sağlayınız.		

7 - No Discrimination is Practiced
[Summary of Findings]

7: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

Confirmed with management & employee interviews as well as document review in accordance with SMETA Best Practice Guidance and Local Law.

No evidence against discrimination requirements of the client was found during the audit processes. Employees stated that they were paid and treated equally.

Evidence examined:

Personnel files
Pay slips
Disciplinary policy
Company social compliance policy
Employee interview

Any other comments:

None.

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 84.0%	Female: 16.0%	
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	5		
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"/> Promotion	<input type="checkbox"/> Compensation <input type="checkbox"/> Termination or retirement	<input type="checkbox"/> Access to training <input checked="" type="checkbox"/> No evidence of discrimination found
Please give details	NA		
Professional Development			
What type of training and development are available for workers?	Discrimination policy and procedure training are given to employees. Also, discipline rules are explained.		
Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

8 - Regular Employment Is Provided
[Summary of Findings]

8: Compliance Requirements
 8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
 8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.
 Additional Elements: Responsible Recruitment
 8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.
 8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.
 8.5 Employment agencies must only supply workers registered with them.
 8.6 Workers pay no recruitment fee at any stage of the recruitment process.
 8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.

Current Systems and Evidence Examined

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

Current Systems:

Employees are not required to sign blank papers.
 All employees were registered to the social security.
 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.
 No temporary worker, apprenticeship schemes or home worker was identified by the auditors.

Evidence examined:

Personnel files
 Employee interviews

Any other comments:

None.

Responsible Recruitment

All Workers

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

Migrant Workers

Type of work undertaken by migrant workers:	There was no migrant employee at the facility.
---	--

Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0
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 checked="" type="checkbox"/> No Please give details: There was no migrant employee at the facility.
Is there any observation on this finding?	There was no migrant employee at the facility.
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Non-employee workers	
Recruitment Fees	
Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Agency Workers (if applicable) (Workers sourced from a local agent who are not directly paid by the site, but paid by the agency. Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)	
Number of agencies used (average):	0
Please provide the names of agencies if applicable	NA
Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there a legal contract agreement with all agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is no agency.
Does the site have a system for checking labour standards of agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is no agency.
Contractors (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.)	
Any contractors on site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: SOFRA GROUP of 9 employees were available for catering service.
If Yes, how many workers supplied by contractors?	9
Do all contractor workers understand their terms of employment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There are legal contracts with all contractors.

If Yes, please give evidence for contractor workers being paid per law	Service Agreement, Employee interview.
--	--

8A - Sub-Contracting and Homeworking
[Summary of Findings]

8A: Compliance Requirements

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

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

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 subcontractor is used by the facility.

Evidence examined:

Employees from every unit were selected and interviewed.
Selected employees' personnel files were checked.

Any other comments:

None.

Summary of sub-contracting – if applicable

Is there any sub-contracting at this site? Yes No

Summary of homeworking – if applicable

Is homeworking used at this site? Yes No

9 - No Harsh or Inhumane Treatment is Allowed
[Summary of Findings]

9: Compliance Requirements

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.

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

There was no evidence of any physical abuse or discipline, the threat of physical abuse, sexual or any other types of harassment or verbal abuse as well as any other forms of intimidation were not noted, as confirmed by the interviews.

Disciplinary regulation was compliant with the legal regulations.

No disciplinary action was taken.

Evidence examined:

Disciplinary regulation of the facility and the personnel files of the sampled employees were reviewed.

Suggestion boxes check book was checked.

Employees' interviews were conducted.

The relevant policy on prevention of harassment and abuse.

Internal grievance procedure documentation.

Training records

Any other comments:

None.

Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?	<input checked="checked" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There are published, anonymous and/or open channels available for reporting any violations of Labour standards. The employees can report to the legal authorities. There is suggestion box, and an internal confidential email address for reporting grievances.
If yes, are workers aware of these channels and have access? Please give details.	Workers are aware of these channels. There are published, anonymous and/or open channels available for reporting any violations of Labour standards.
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Suggestion box, employee representative, open door policy.
Which of the following groups is there a grievance mechanism in place for?	<input checked="checked" type="checkbox"/> Worker <input checked="checked" type="checkbox"/> Communities <input checked="checked" type="checkbox"/> Suppliers <input type="checkbox"/> Other
Please provide grievance mechanism details	Suggestion box, employee representative, open door policy are used for employees. Also, the facility has a hotline that is posted on their website and the entrance of the facility building for external communities.

<p>Are there any open disputes?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: The facility record open disputes.</p>
<p>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)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p>
<p>Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p>
<p>If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p>
<p>Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Please refer to NC.</p>

10A - Entitlement to Work and Immigration
[Summary of Findings]

10A: Compliance Requirements

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

10.A.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:

All workers were local.
No migrant worker was employed.

Evidence examined:

Personnel files
Labour contracts
Employee interviews
Management interview

Any other comments:

None.

10B4 - Environment 4–Pillar
[Summary of Findings]

10B4: Compliance Requirements

- 10.B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.
 - 10.B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.
 - 10.B4.3 Businesses shall be aware of their end client’s environmental standards/code requirements
 - 10.B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.
 - 10.B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.
 - 10.B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4–pillar audit report and audit checks for details).
 - 10.B4.7 Businesses shall make continuous improvements in their environmental performance.
 - 10.B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation
 - 10.B4.9 Businesses should have a nominated individual responsible for co–ordinating the site’s efforts to improve environmental performance.
- 10B4: Guidance for Observations**
- 10.B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.
 - 10.B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.

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

Current Systems and Evidence Examined

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

Current Systems:

There is a written environment policy of the facility.
There was environmental impact analysis and environmental permit.
All wastes were given licensed firms.

Evidence examined:

Environmental documents such as environmental policy and procedures are checked.

Any other comments:

None.

Environmental Analysis

Is there a manager responsible for Environmental issues (Name and Position):

Erhan Callı - Environmental Engineer

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?

Yes No

Please give details:

There is risk assessment about the environmental risks.

Does the site have a recognised environmental system certification such as ISO 14000 or equivalent?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has ISO 14001:2015 (The expiry date is not provided.)
Does the site have an Environmental policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, is it publicly available?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility's environmental policy address the key impact from their operations and their commitment to improvement.
Does the site have a Biodiversity policy?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: NA.
Have all legally required permits been shown?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There is environmental permit and wastewater treatment plant project approval letter.
Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Please give details: MSDS documents available for chemicals.
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility demands social compliance audits including chemicals and environmental issues from its important suppliers for managing clients' requirements.
Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There are short/long term targets of the facility.
Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Waste recycling is monitored.
Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has Energy management system and they measure and monitor consumption of utilities.

Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility demands social compliance audits including chemicals and environmental issues from its important suppliers for managing clients' requirements.	
Usage/Discharge analysis		
Criteria	Previous year: 2022	Current year: 2023
Electricity Usage: Kw/hrs	37895174	14591917
Renewable Energy Usage: Kw/hrs	0	0
Gas Energy Usage: Kw/hrs	238441176	92227796
Has site completed any carbon Footprint Analysis?	Yes	Yes
If Yes, please state result	Not provided	Not provided
Water Sources	Well water	Well water
Water Volume Used	10500	10500
Water Discharged	Sewage water	Sewage water
Water Volume Discharged	1500	1500
Water Volume Recycled	9000	9000
Total waste produced	368424	115234
Total hazardous waste produced	48660	14305
Waste to recycling	319764	100929
Waste to landfill	0	0
Waste to other	0	0
Total Product Produced	Not provided	650000

10C - Business Ethics – 4-Pillar Audit
[Summary of Findings]

10C: Compliance Requirements
 10.C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.
 10.C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.
 10.C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.
 10.C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.
 10.C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,
 10.C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics
 10.C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.
 10C: Guidance for Observations
 10.C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.
 10.C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented

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

Current Systems and Evidence Examined

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

Current Systems:

The facility has social compliance policy including the main aspects of the business ethics and detailed ethics policy. Act of corruption, extortion or embezzlement, or any form of bribery in its activities as a business enterprise is noted.

Evidence examined:

Disciplinary rules, social compliance policy, ethics policy, employee & management interviews.

Any other comments:

None.

<p>Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?</p>	<p><input checked="" type="checkbox"/> Internal Policy <input checked="" type="checkbox"/> Policy for third parties including suppliers</p> <p>Please give details: The facility has a business ethics policy and the policy was communicated internally and externally via e-mails.</p>
<p>Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Employees are informed on business ethics issues.</p>

Is the policy updated on a regular (as needed) basis?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The management stated that the policy was updated on a regular (as needed) basis.
Does the site require third parties including suppliers to complete their own business ethics training	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Business ethics policy are informed and sent to the suppliers.

Attachments



Assembly Point.jpg



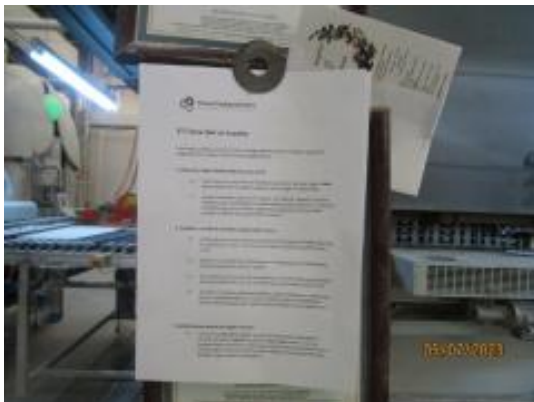
Ceramic - Production Area.jpg



Emergency Exit-1.jpg



Decor Building.jpg



ETI Base Code.jpg



First aid box.jpg



Generator.jpg



First aid box (2).jpg



Fire Hose.jpg



Eye wash station.jpg



Floor Tile - production area.jpg



Evacuation Plan.jpg



Fire Extinguisher.jpg



Hazardous waste area.jpg



Fire Alarm Button.jpg



Infirmary.jpg



Locker Room.jpg



Siren and Gas Detector.jpg



waste area.jpg



Total waste area.jpg



Suggestion Box.jpg



Union Meeting Area.jpg



Toilets.jpg



PPE.jpg



Production Records.jpg



Rest Area.jpg



Raw material area.jpg



PPE (Personal Protective Equipment).jpg



Notice Board.jpg



production record.jpg



Potable water.jpg



Outside view of the facility.jpg



Potable water (2).jpg



production area.jpg



Main Electricity Panel.jpg



Lunch Area.jpg



Out of use building.jpg



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=riPsbE0PQ52ehCo3lnq5lw_3d_3d

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

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

[Click here for Auditors:](#)

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