



SMETA Corrective Action Plan Report (CAPR)

Version 6.1



| Audit Details | | | |
|---|--|---|--|
| Sedex Company Reference: <i>(only available on Sedex System)</i> | ZC: 410391692 | Sedex Site Reference: <i>(only available on Sedex System)</i> | ZS: 4103911848 |
| Business name (Company name): | BAKTAR TARIM URUNLERI GIDA HAYV. KUYUMCULUK NAK. SAN. VE TIC. LTD. STI. | | |
| Site name: | BAKTAR TARIM URUNLERI GIDA HAYV. KUYUMCULUK NAK. SAN. VE TIC. LTD. STI. | | |
| Site address: <i>(Please include full address)</i> | Head Office: Saricioglu Mah., Sahur Sok. Poyraz Is Merkezi No. 2/Z06 Battalgazi, Malatya Factory: Ankara Yolu 25. Km Kotangolu Mevkii No.119 Akcadag, Malatya | Country: | Turkey |
| Site contact and job title: | Mr. Mahmut Bak – Factory Manager | | |
| Site phone: | 00 90 422 326 26 34 | Site e-mail: | mahmut@baktartarim.com |
| SMETA Audit Pillars: | <input checked="" type="checkbox"/> Labour Standards | <input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar) | <input checked="" type="checkbox"/> Environment 4-pillar <input checked="" type="checkbox"/> Business Ethics |
| Date of Audit: | 22.05.2020 | | |

| | |
|---|--|
| Audit Company Name & Logo: SMT GLOBAL | Report Owner (payer): <i>(If paid for by the customer of the site please remove for Sedex upload)</i> BAKTAR TARIM URUNLERI GIDA HAYV. KUYUMCULUK NAK. SAN. VE TIC. LTD. STI. |
|---|--|

| 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.

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

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

Lead auditor: N. BUYUKISCAN - SENIOR AUDITOR APSCA number: RA21702262

Team auditor: NONE

Interviewers: N. BUYUKISCAN

Report writer: N. BUYUKISCAN

APSCA number: RA21702262

Report reviewer: CHERRY LEE

Date of declaration: 22.05.2020

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

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

Audit Parameters

| Audit Parameters | | | |
|--|--|-----------------------------------|-----------------------------------|
| A: Time in and time out | Day 1 Time in: 09:00 Day 1 Time out: 17:00 | Day 2 Time in: Day 2 Time out: | Day 3 Time in: Day 3 Time out: |
| B: Number of auditor days used: | 1,5 MAN DAY (1 Auditor x 1 Day and 0.5 reporting day) | | |
| C: Audit type: | <input checked="" type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define: | | |
| D: Was the audit announced? | <input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 4 weeks <input type="checkbox"/> Unannounced | | |
| E: Was the Sedex SAQ available for review? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not: The factory was aware of SAQ | | |
| F: Any conflicting information SAQ/Pre-Audit Info to Audit findings? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause | | |
| G: Who signed and agreed CAPR (Name and job title) | Mr. Mahmut Bak – Factory Manager | | |
| H: Is further information available (if yes, please contact audit company for details) | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | |
| I: Previous audit date: | N/A | | |
| J: Previous audit type: | N/A | | |
| K: Were any previous audits reviewed for this audit | <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A | | |

| Audit attendance | Management | Worker Representatives | |
|---|---|---|---|
| | Senior management | Worker Committee representatives | Union representatives |
| A: Present at the opening meeting? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| B: Present at the audit? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| C: Present at the closing meeting? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i> | There are 2 worker representatives. (1 female, 1 male) | | |
| E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i> | There is not union in the facility. | | |

Guidance

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

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

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

Root cause (see column 4)

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

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

Next Steps:

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

Corrective Action Plan

Corrective Action Plan – non-compliances

| Non-Compliance Number <i>The reference number of the non-compliance from the Audit Report, for example, Discrimination No.7</i> | New or Carried Over <i>Is this a new non-compliance identified at the follow-up or one carried over (C) that is still outstanding</i> | Details of Non-Compliance <i>Details of Non-Compliance</i> | Root cause <i>(completed by the site)</i> | Preventative and Corrective Actions <i>Details of actions to be taken to clear non-compliance, and the system change to prevent re-occurrence (agreed between site and auditor)</i> | Timescale <i>(Immediate, 30, 60, 90, 180, 365)</i> | Verification Method <i>Desktop / Follow-Up [D/F]</i> | Agreed by Management and Name of Responsible Person: <i>Note if management agree to the non-compliance, and document name of responsible person</i> | Verification Evidence and Comments <i>Details on corrective action evidence</i> | Status <i>Open/Closed or comment</i> |
|---|---|--|---|---|--|--|---|---|--|
| | | The factory fulfils the requirements of ETI Base Code and local law. | | | | | | | |

Corrective Action Plan – Observations

| Observation Number <i>The reference number of the observation from the Audit Report, for example, Discrimination No.7</i> | New or Carried Over <i>Is this a new observation identified at the follow-up or one carried over (C) that is still outstanding</i> | Details of Observation <i>Details of Observation</i> | Root cause <i>(completed by the site)</i> | Any improvement actions discussed <i>(Not uploaded on to SEDEX)</i> |
|---|--|--|---|---|
| | | None observed. | | |

Good examples

| Good example Number <i>The reference number of the good example from the Audit Report, for example, Discrimination No.7</i> | Details of good example noted | Any relevant Evidence and Comments |
|---|--|--|
| Ödemeler & Haklar Wages & Benefits No:5 #1 | Meal and transportation are provided free of charge to employees. / Yemek ve ulaşım tüm çalışanlara ücretsiz sağlanmaktadır. | Çalışan Görüşmesi, Döküman İncelemesi Employee Interview, Document Review |

Confirmation

| | | |
|---|-------------------|--|
| <p>Please sign this document confirming that the above findings have been discussed with and understood by you: (site management) <i>If actual signatures are not possible in electronic versions, please state the name of the signatory in applicable boxes, as indicating the signature.</i></p> | | |
| A: Site Representative Signature: | Mr. Mahmut Bak | Title: Factory Owner Date: 22 May, 2020 |
| B: Auditor Signature: | Ms. N. Buyukiscan | Title: Lead Auditor Date: 22 May, 2020 |
| C: Please indicate below if you, the site management, dispute any of the findings. No need to complete D-E, if no disputes. | | |
| D: I dispute the following numbered non-compliances: NONE | | |
| E: Signed: (If <u>any</u> entry in box D, please complete a signature on this line) | NONE | NONE |
| F: Any other site Comments: Nil | | |

Guidance on Root Cause

Explanation of the Root Cause Column

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

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

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

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

Some examples of finding a "root cause"

Example 1

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

Example 2

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

Example 3

A site uses fines to control unacceptable behaviour of workers.

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

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

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

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

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



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

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

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

[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

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

[Click here for Supplier \(B\) members:](http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d)

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d

[Click here for Auditors:](https://www.surveymonkey.co.uk/r/BRTVCKP)

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



Sedex Members Ethical Trade Audit Report

Version 6.1



| Audit Details | | | | |
|---|--|---|--|---|
| Sedex Company Reference: <i>(only available on Sedex System)</i> | ZC: 410391692 | Sedex Site Reference: <i>(only available on Sedex System)</i> | ZS: 4103911848 | |
| Business name (Company name): | BAKTAR TARIM URUNLERI GIDA HAYV. KUYUMCULUK NAK. SAN. VE TIC. LTD. STI. | | | |
| Site name: | BAKTAR TARIM URUNLERI GIDA HAYV. KUYUMCULUK NAK. SAN. VE TIC. LTD. STI. | | | |
| Site address: <i>(Please include full address)</i> | Head Office: Saricioglu Mah., Sahur Sok. Poyraz Is Merkezi No. 2/Z06 Battalgazi, Malatya Factory: Ankara Yolu 25. Km Kotangolu Mevkii No.119 Akcadag, Malatya | Country: | Turkey | |
| Site contact and job title: | Mr. Mahmut Bak – Factory Manager | | | |
| Site phone: | 00 90 422 326 26 34 | Site e-mail: | mahmut@baktartarim.com | |
| SMETA Audit Pillars: | <input checked="" type="checkbox"/> Labour Standards | <input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar) | <input checked="" type="checkbox"/> Environment 4-pillar | <input checked="" type="checkbox"/> Business Ethics |
| Date of Audit: | 22.05.2020 | | | |

| | |
|---|--|
| Audit Company Name & Logo: SMT GLOBAL | Report Owner (payer): <i>(If paid for by the customer of the site please remove for Sedex upload)</i> BAKTAR TARIM URUNLERI GIDA HAYV. KUYUMCULUK NAK. SAN. VE TIC. LTD. STI. |
|---|--|

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

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

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

Lead auditor: N. BUYUKISCAN APSCA number: RA21702262

Team auditor: NONE

Interviewers: N. BUYUKISCAN

Report writer: N. BUYUKISCAN

APSCA number: RA21702262

Report reviewer: CHERRY LEE

Date of declaration: 22.05.2020

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

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

Summary of Findings

| Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i> | Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i> | | | | Record the number of issues by line*: | | | Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i> |
|---|--|--------------------------|--------------------------|--------------------------|---------------------------------------|-----|----|--|
| | ETI Base Code | Local Law | Additional Elements | Customer Code | NC | Obs | GE | |
| 0A Universal Rights covering UNGP | | | <input type="checkbox"/> | <input type="checkbox"/> | 0 | 0 | 0 | • None observed |
| 0B Management systems and code implementation | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 0 | 0 | 0 | • None observed |
| 1. Freely chosen Employment | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | 0 | 0 | 0 | • None observed |
| 2. Freedom of Association | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | 0 | 0 | 0 | • None observed |
| 3. Safety and Hygienic Conditions | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | 0 | 0 | 0 | • None observed |
| 4. Child Labour | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | 0 | 0 | 0 | • None observed |
| 5. Living Wages and Benefits | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | 0 | 0 | 1 | Good Examples 1- Meal and transportation are provided free of charge to employees. |
| 6. Working Hours | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | 0 | 0 | 0 | • None observed |
| 7. Discrimination | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | 0 | 0 | 0 | • None observed |
| 8. Regular Employment | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 0 | 0 | 0 | • None observed |
| 8A. Sub-Contracting and | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 0 | 0 | 0 | • None observed |

| | | | | | | | | | |
|------|------------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|----|----|----|-----------------|
| | <u>Homeworking</u> | | | | | | | | |
| 9 | <u>Harsh or Inhumane Treatment</u> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 0 | 0 | 0 | • None observed |
| 10A | <u>Entitlement to Work</u> | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 0 | 0 | 0 | • None observed |
| 10B2 | <u>Environment 2-Pillar</u> | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | NA | NA | NA | • NA |
| 10B4 | <u>Environment 4-Pillar</u> | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 0 | 0 | 0 | • None observed |
| 10C | <u>Business Ethics</u> | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 0 | 0 | 0 | • None observed |

General observations and summary of the site:

During the audit; there is no Non Conformity observed in the factory and 1 (one) Good Examples has been noted as follows:

GE-1: Meal and transportation are provided free of charge to employees.

During the audit, Factory manager Mr. Mahmut Bak provided documentation for the audit and was the person in charge for the audit procedure in the firm. The firm is producing slipper, sandal and shoes, in one shift. At the opening and closing meeting, worker representative, HR Manager, Factory manager and OHS specialists were present for signature. At the closing meeting, Mr. Mahmut Bak – Factory manager signed the CAP form

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

Site Details

| Site Details | | | | | | | | | | | |
|---|---|--|---------------------------|-------------|----------------|--------------|--|-----|----------------------------|----|-----|
| A: Company Name: | BAKTAR TARIM URUNLERI GIDA HAYV. KUYUMCULUK NAK. SAN. VE TIC. LTD. STI. | | | | | | | | | | |
| B: Site name: | BAKTAR TARIM URUNLERI GIDA HAYV. KUYUMCULUK NAK. SAN. VE TIC. LTD. STI. | | | | | | | | | | |
| C: GPS location: (If available) | Head Office: Saricioglu Mah., Sahur Sok. Poyraz Is Merkezi No. 2/Z06 Battalgazi, Malatya Factory: Ankara Yolu 25. Km Kotangolu Mevkii No.119 Akcadag, Malatya | Latitude: 38.373268 Longitude: 38.00235 | | | | | | | | | |
| D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections | Business Licence: # 2013-106 | | | | | | | | | | |
| E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc | Packaging and manufacturing of dry and fresh fruits and vegetables Main products: Fresh apricot, natural dried apricot, dried apricot, fig, nut and dried mulberry. | | | | | | | | | | |
| F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings) | <p>The audited factory was established in 2011 and located in Malatya city, Turkey. The factory expertises in processing of dry and fresh fruits and vegetables, mainly apricots.</p> <p>The factory production was located in a single floor production building with a total area of 5,000 square meters. The process of selection, sorting and packaging were all done in-house in the factory. The floor-wise description of the factory was as follows:</p> <table border="1"> <thead> <tr> <th>Production Building no -1</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Ground Floor</td> <td>Incoming warehouse, selection, sorting, QC and packaging, finished goods warehouse, WCs, doctor's room, eating area.</td> <td>Nil</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td>Nil</td> </tr> </tbody> </table> <p>There was no dormitory attached to the factory. No union was established in the factory. The entire workforce of the factory consists of a total 45 employees (8 male, 37 female), All workers were living domestically and had permanent contracts. There were no young workers in the factory. The youngest worker age was 18 years old.</p> | | Production Building no -1 | Description | Remark, if any | Ground Floor | Incoming warehouse, selection, sorting, QC and packaging, finished goods warehouse, WCs, doctor's room, eating area. | Nil | Is this a shared building? | No | Nil |
| Production Building no -1 | Description | Remark, if any | | | | | | | | | |
| Ground Floor | Incoming warehouse, selection, sorting, QC and packaging, finished goods warehouse, WCs, doctor's room, eating area. | Nil | | | | | | | | | |
| Is this a shared building? | No | Nil | | | | | | | | | |

| | |
|---|---|
| | <p>The factory adopted finger scan attendance system to record employees' clocking in and out hours. The regular working hours of all employees were from Monday to Friday; from 7:00 a.m. to 5:00 p.m. with two times 15-minute tea breaks at 9:00 a.m. and 3:00 p.m. respectively and 30 minutes meal at 12:00 p.m. Saturdays and Sundays were granted as weekly rest day.</p> <p>The regular monthly salaries were paid in monthly rate to all employees through bank transfer on the first day of each month.</p> <p>F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: There was not any visible structural integrity issues such as cracks on the building where the company was located.</p> <p>F3: Does the site have a structural engineer evaluation? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>F4: Please give details: The facility has construction permit.</p> |
| <p>G: Site function:</p> | <input type="checkbox"/> Agent <input 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 checked="" type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor |
| <p>H: Month(s) of peak season: (if applicable)</p> | <p>Harvest seasons mainly July and August for fresh apricots.</p> |
| <p>I: Process overview: <i>(Include products being produced, main operations, number of production lines, main equipment used)</i></p> | <p>All processes were in-housed and no subcontractors were being used by the factory. The factory had a monthly capacity of 4,000 tones per month for dried apricots and 2,500 tones per month for fresh apricots.</p> <p>Products being produced are : Fresh apricot, natural dried apricot, dried apricot, fig, nut and dried mulberry.</p> |
| <p>J: What form of worker representation / union is there on site?</p> | <input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (specify) (worker representatives, open door policy and suggestion boxes) <input type="checkbox"/> None |
| <p>K: Is there any night production work at the site?</p> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

| | |
|--|---|
| <p>L: Are there any on site provided worker accommodation buildings e.g. dormitories</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation N/A</p> |
| <p>M: Are there any off site provided worker accommodation buildings</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers N/A</p> |
| <p>N: Were all site-provided accommodation buildings included in this audit</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: If no, please give details N/A</p> |

| Audit Parameters | | | |
|--|--|---------------------------------------|---------------------------------------|
| A: Time in and time out | Day 1 Time in: 09:00 Day 1 Time out: 17:00 | Day 2 Time in: - Day 2 Time out: - | Day 3 Time in: - Day 3 Time out: - |
| B: Number of auditor days used: | 1,5 MAN DAY (1 Auditor x 1 Day and 0.5 reporting day) | | |
| C: Audit type: | <input checked="" type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define: | | |
| D: Was the audit announced? | <input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 4 weeks <input type="checkbox"/> Unannounced | | |
| E: Was the Sedex SAQ available for review? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not: The factory was aware of SAQ | | |
| F: Any conflicting information SAQ/Pre-Audit Info to Audit findings? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause | | |
| G: Who signed and agreed CAPR (Name and job title) | Mr. Mahmut Bak – Factory manager | | |
| H: Is further information available (If yes, please contact audit company for details) | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | |
| I: Previous audit date: | N/A | | |
| J: Previous audit type: | N/A | | |
| K: Were any previous audits reviewed for this audit | <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A | | |

| Audit attendance | Management | Worker Representatives | |
|--|---|---|---|
| | Senior management | Worker Committee representatives | Union representatives |
| A: Present at the opening meeting? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| B: Present at the audit? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| C: Present at the closing meeting? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i> | There are 2 worker representatives; 1 female and 1 male | | |
| E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i> | There is no union in the facility. | | |

Worker Analysis

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

| Worker Analysis | | | | | | | | |
|--|-----------|-----------|--------|-----------|-----------|--------|--------------|-------|
| | Local | | | Migrant* | | | Home workers | Total |
| | Permanent | Temporary | Agency | Permanent | Temporary | Agency | | |
| Worker numbers – Male | 8 | 0 | 0 | 0 | 0 | 0 | 0 | 8 |
| Worker numbers – female | 37 | 0 | 0 | 0 | 0 | 0 | 0 | 37 |
| Total | 45 | 0 | 0 | 0 | 0 | 0 | 0 | 45 |
| Number of Workers interviewed – male | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 2 |
| Number of Workers interviewed – female | 8 | 0 | 0 | 0 | 0 | 0 | 0 | 8 |
| Total – interviewed sample size | 10 | 0 | 0 | 0 | 0 | 0 | 0 | 10 |



| | | |
|--|--|--|
| A: Nationality of Management | Turkish | |
| <p>B: Please list the nationalities of all workers, with the three most common nationalities listed first.</p> <p><i>Please add more nationalities as applicable to site. Add more rows if required.</i></p> | <p>Nationalities:</p> <p>B1: Nationality 1: <u>_TURKISH_</u></p> <p>B2: Nationality 2: _____</p> <p>B3: Nationality 3: _____</p> | <p>Was the list completed during peak season?</p> <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods:</p> |
| C: Please provide more information for the three most common nationalities. | <p>C: approx % total workforce: Nationality 1 <u>_100%</u></p> <p>C1: approx % total workforce: Nationality 2 _____</p> <p>C2: approx % total workforce: Nationality 3 _____</p> | |
| D: Worker remuneration <i>(management information)</i> | <p>D: _____% workers on piece rate</p> <p>D1: _____% hourly paid workers</p> <p>D2: <u>_100_</u>% salaried workers</p> <p>Payment cycle:</p> <p>D3: _____% daily paid</p> <p>D4: _____% weekly paid</p> <p>D5: <u>_100_</u>% monthly paid</p> <p>D6: _____% other</p> <p>D7: If other, please give details</p> | |



| Worker Interview Summary | |
|--|---|
| A: Were workers aware of the audit? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| B: Were workers aware of the code? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i> | 1 group interview with 4 workers |
| D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i> | D1: Male: 2 D2: Female: 4 |
| E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details |
| F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| G: In general, what was the attitude of the workers towards their workplace? | <input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent |
| H: What was the most common worker complaint? | NONE |
| I: What did the workers like the most about working at this site? | Payment on time, positive management attitude and family environment |
| J: Any additional comment(s) regarding interviews: | NONE |
| K: Attitude of workers to hours worked: | Employees are happy regarding working hours and regularly paid monthly wages |
| L. Is there any worker survey information available? | |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details: NA | |

M: Attitude of workers:

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

The general attitude of the employees was positive. Social insurance and payment on time were the positive issues raised by the employees.

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

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

No negative comment was noted during the worker representative interview. There were 2(two) worker representatives were interviewed during audit. Worker representative reported that meetings were conducted monthly. Worker representative was pleased by management positive attitude, open door policy and happy with working with colleagues.

O: Attitude of managers:

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

Management was helpful during the audit process.

Audit Results by Clause

0A: Universal Rights covering UNGP

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

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

Mr. Mahmut Bak – Factory manager is responsible for implementing standards concerning Human Rights. The factory didn't engage in any form of servitude, forced, bonded, indentured, trafficked or nonvoluntary labour. The factory didn't support to inhuman or degrading treatment, corporal punishment, mental or physical coercion and/or verbal abuse.

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

Details:

Social compliance policy and related procedures

Authorization letter of social compliance responsible

Supplier chain mapping

Supplier and Subcontractors choosing and evaluating procedure

Grievance Mechanism Feedbacks

Management interview

Employee interviews

Any other comments: None

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

Yes

No

Please give details (mainly applicable for the parent company): Policy on commitment to respect

| | |
|---|--|
| | human rights was established under company social compliance policy that was reviewed by auditor on the audit day. |
| B: 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: Mr. Mahmut Bak is responsible for implementing standards concerning Human Rights Name: Mr. Mahmut Bak Job title: Factory manager |
| C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: The facility has suggestion boxes placed at several places. |
| D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement) | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details The grievance mechanism both for employees and external business partners is legitimate, accessible, predictable, transparent, rights-compatible in line with it is supported with the grievance mechanism feed backs. |
| E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Personal data such as HR Files, payment details, employment history are kept secure in the firm, and only designated person(s) can access to that information. |

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

| Good examples observed: | |
|--|--|
| Description of Good Example (GE): None | Objective Evidence Observed: N/A |

Measuring Workplace Impact

| Workplace Impact | | |
|--|---|--------------------------------------|
| A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover) | A1: Last year: 2019 4,83 % | A2: This year: 2020 4,83 % |
| B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2] | 2,14 % | |
| C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year | C1: Last year: 0 % | C2: This year: 0 % |
| D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month | 0 % | |
| E: Are accidents recorded? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Accident Records are kept. | |
| F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers] | F1: Last year: 2018 Number: 0,322 | F2: This year: 2020 Number: 0,238 |
| G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers] | 0,208 | |
| H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers] | H1: Last year: 5,07 | H2: This year: 5,187 |
| I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months: | I1: 6 months __NA__ % workers | I2: 12 months __NA__ % workers |
| J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months: | J1: 6 months __NA__ % workers | J2: 12 months __NA__ % workers |

0B: Management system and Code Implementation

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

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

Current Systems and Evidence Examined

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

Current systems:

The facility has disciplinary procedures and work rules which were 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 Mr. Mahmut Bak

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

Details:

- Management interview
- Employee interviews
- Training records
- Company policies

Any other comments: None

Management Systems:

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

Yes
 No
 A1: Please give details: NA

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

Yes
 No
 B1: Please give details: Policies and procedures about reduce the risk of forced labour, child labour, discrimination and harassment & abuse are available.

| | |
|--|---|
| <p>C: 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 Subcontracting.). Workers stated no forced labour, no child labour was found (through interview checks), there were both female and male among management/supervisors.</p> |
| <p>D: 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 D1: Please give details: These policy and procedures are communicated to the all staff through posters and also communicated as a part of orientation training.</p> |
| <p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: There is just as a part of orientation training.</p> |
| <p>F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).</p> | <p><input type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: NA</p> |
| <p>G: Is there a Human Resources manager/department? If Yes, please detail.</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Mr. Mahmut Bak is responsible for implementing standards concerning Human Rights.</p> |
| <p>H: Is there a senior person /manager responsible for implementation of the code</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Mr. Mahmut Bak is responsible for implementation of company policies and procedures.</p> |
| <p>I: Is there a policy to ensure all worker information is confidential?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: The facility communicates the ETI Base Code to all employees via posting to the announcement board.</p> |
| <p>J: Is there an effective procedure to ensure confidential information is kept confidential?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: All worker information is kept on their personnel files</p> |
| <p>K: Are risk assessments conducted to evaluate policy and procedure effectiveness?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Health and Safety Risk</p> |

| | |
|---|--|
| | assessment includes policy and procedures effectiveness. |
| L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: The facility perform a corrective action plan for the findings that addressed on risk assessment. |
| M: Does the facility have a policy/code which require labour standards of its own suppliers? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: The facility has choosing and evaluating procedure for its suppliers. |
| Land rights | |
| N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Facility has operating license |
| O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: Facility has operating license |
| P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No P1: If yes, how does the company obtain FPIC: Facility has land right policy |
| Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: The facility is the renter of the building and there is operating license . |
| R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: There is no land acquisition. In case of a land acquisition, the facility has to apply to the municipality and fulfil the obligations regarding environmental impact assessment, construction permit etc. |
| S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details: NA |

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

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

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

1: Freely Chosen Employment

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

ETI

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

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

Current Systems and Evidence Examined

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

Current systems:

The factory has a policy against forced labour and the policy was reviewed by auditor.
 There was a non-formalized application procedure which states that workers must present their ID's.
 There was no forced or bonded labour at the company.
 Movement of employees at the facility were not limited.
 Employees have free access to toilets and drinkable water.
 Employment was freely chosen.
 Workers were free to leave and were not required to lodge deposits or ID papers with their employers.
 The above was confirmed during management and workers' interviews.

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

Details:

- Policy documents
- Workers' interviews
- Personnel files and pay-slips
- Disciplinary records
- Labour contracts

Any other comments: None

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

| | |
|---|--|
| D: Are there any restrictions on workers' freedom to terminate employment? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding: NA |
| E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'? | <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding |
| F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding: |
| G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain | <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected: |
| H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: The facility has a detailed procedure regarding this issue which includes reducing the risk of forced/ trafficked labour at the facility. |

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

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

| Good Examples observed: | |
|---|-------------------------------------|
| Description of Good Example (GE): None | Objective evidence observed: N/A |

2: Freedom of Association and Right to Collective Bargaining are Respected
[\(Click here to return to summary of findings\)](#)
[\(Click here to return to Key Information\)](#)

ETI

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

Current Systems and Evidence Examined

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

Current systems:
 There is no union in the facility. Company does not restrict workers to join or form any union which is asked during interviews. There was an open-door policy in operation at the company. Employees may appeal their grievances or suggestions directly to their supervisors. Also, employees stated that they can use suggestion boxes to express their opinions and they can share the issues with Worker Representative. There are 2 worker representatives for general working conditions.

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

Details:
 Management interview
 Workers' interviews
 Worker representative interview
 Suggestion box records
 Policy of the facility regarding Freedom of Association.

Any other comments: None

| | | |
|---|---|---|
| <p>A: What form of worker representation/union is there on site?</p> | <input type="checkbox"/> Union (name) <input type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (specify) (worker representatives, open door policy and suggestion boxes) <input type="checkbox"/> None | |
| <p>B: Is it a legal requirement to have a union?</p> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| <p>C: Is it a legal requirement to have a worker's committee?</p> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| <p>D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)</p> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>D1: Please give details: Employees declared that they can go directly to the management for their suggestions whenever they want. In addition to this, Suggestion boxes are placed in several places of the company.</p> <p>D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> | |
| <p>E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?</p> | <input type="checkbox"/> Yes <input type="checkbox"/> No <p>E1: Please give details: NA</p> | |
| <p>F: Name of union and union representative, if applicable:</p> | <p>NA</p> | <p>F1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> |
| <p>G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?</p> | <p>Worker Representative</p> | <p>G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> |
| <p>H: Are all workers aware of who their representatives are?</p> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | |
| <p>I: Were worker representatives freely elected?</p> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <p>I1: Date of last election: 27.06.2019</p> |
| <p>J: Do workers know what topics can be raised with their representatives?</p> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | |
| <p>K: Were worker representatives/union representatives interviewed?</p> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>If Yes, please state how many:</p> | |
| <p>L: Please describe any evidence that union/worker's committee is effective?</p> | <p>There is no Union or worker committee present at site. However, worker representatives are present and they are responsible for participating into OHS Board Meetings, representing employees and listening them to address the employee problems.</p> | |

| | | |
|--|---|---|
| Specify date of last meeting; topics covered; how minutes were communicated etc. | | |
| M: Are any workers covered by Collective Bargaining Agreement (CBA)? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| If Yes , what percentage by trade Union/worker representation | M1: 0 % workers covered by Union CBA | M2: 0 % workers covered by worker rep CBA |
| M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay? | <input type="checkbox"/> Yes <input type="checkbox"/> No NA | |

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

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

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

3: Working Conditions are Safe and Hygienic

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

1-General Health and Safety management

- Potable water was freely available in all areas and test certificates were up-to-date. Sufficient clean toilets segregated by gender were available always to workers
- Health certificates for kitchen operator and the hygiene certificate for the kitchen were up-to-date and legal
- Emergency case plans were provided inside the facility.
- Emergency evacuation plans were provided in the facility.
- Injury records are kept by facility.

2-Fire Safety

- Exits were clearly marked.
- Firefighting equipment are adequate and checks were up-to-date.
- Training had been given by fire marshals who had been specially selected specifically for extra training.

3-Electric al safety

- All electric al equipment are maintained in good condition such as sockets, plugs, switches and main fuse boards.

4-Chemic al safety

- Chemical warehouse were clearly and well prepared

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

Details:

- Health and safety policy
- Training records and certificates
- Fire equipment maintenance records

Fire drill records
 Government licenses and checks on air quality and noise level
 Accident reports
 Health certificates for kitchen staff
 Potable water testing certificates
 Interviews with workers

Any other comments: None

| | |
|--|--|
| <p>A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: The facility has Health & Safety Procedures and these procedures have been shared with employees via trainings.</p> |
| <p>B: Are the policies included in workers' manuals?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The facility has a detailed Health & Safety procedure and this procedure is explained in Health and Safety trainings to employees.</p> |
| <p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: NA</p> |
| <p>D: Are visitors to the site informed on H&S and provided with personal protective equipment</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: This information is provided by Health & Safety Specialist.</p> |
| <p>E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: There is a doctor room at the facility meeting legal requirements.</p> |
| <p>F: Is there a doctor or nurse on site or there is easy access to first aider/trained medical aid?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: The first aid boxes are placed at the production area. However there are first aiders in the facility.</p> |
| <p>G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: All transportation vehicles have insurance and all drivers has professional competence certificate (SRC).</p> |
| <p>H: Is secure personal storage space provided for workers in their living space and is fit for purpose?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: NA-There is no living space.</p> |
| <p>I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift)</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: The risk assessment has working hour's section.</p> |

| | |
|--|---|
| and are there controls to reduce identified risk? | |
| J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: The facility gets necessary steps for the disposal of natural sources. |
| K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N/A K1: Please give details: Well prepared. |

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

| Observation: | |
|---|---|
| Description of observation: None observed Local law or ETI requirement: Not applicable Recommended corrective action: Not applicable | Objective evidence observed: NA |

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

4: Child Labour Shall Not Be Used

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

The youngest employee was 18 years old in the facility.
The age control of applicants is performed during recruitment process by HR responsible.

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

Details:

- ID Copies of employees
- Personnel file
- Management and employees' interviews

Any other comments: None

| | |
|--|---|
| A: Legal age of employment: | 15 |
| B: Age of youngest worker found: | 18 |
| C: Are there children present on the work floor but not working at the time of audit? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| D: % of under 18's at this site (of total workers) | 0 % |
| E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details: |

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

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

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

5: Living Wages are Paid

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

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

ETI

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

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

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

Current Systems and Evidence Examined

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

Current systems:

There was no employee under the legal minimum wage. Pay slip is given to the employees.

Annual leaves are used by the employees properly. Wages are paid on 1st of each month.

All employees were paid above minimum wage.

Benefits such as social insurance, annual leave, and child-bearing leave are provided to employees.

Since January 1st, 2020: 2943,00 TL (Gross- including subsistence allowance); 2324,70 TL (Net- including subsistence allowance) / month

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

Details:

Social insurance records

Employees' & management interviews

Labor contracts

Any other comments: None

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

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

| Good Examples observed: | |
|---|--|
| <p>Description of Good Example (GE):</p> <p>1-Meal and transportation is given free of charge to all employees.</p> | <p>Objective Evidence Observed: Document Review</p> |

Summary Information

| Criteria | Local Law <i>(Please state legal requirement)</i> | Actual at the Site <i>(Record site results against the law)</i> | Is this part of a Collective Bargaining Agreement? |
|--|---|---|--|
| <p>A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i></p> | <p>Legal maximum: 45 hours/ week</p> | <p>A1: 45 hours/ week</p> | <p>A2: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> |
| <p>B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i></p> | <p>Legal maximum: 11 total working hours per day (regular + overtime), 270 overtime hours per year</p> | <p>B1: : 15 total working hours per day (regular + overtime)</p> | <p>B2: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> |
| <p>C: Wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i></p> | <p>Legal minimum: Since January 1st, 2020: 2943,00 TL (Gross including subsistence allowance); 2324,70 TL (Net including subsistence allowance) / month</p> | <p>C1: Since January 1st, Since January 1st, 2020: 2943 TL (Gross including subsistence allowance); 2324,70 TL (Net including subsistence allowance) / month</p> | <p>C2: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> |
| <p>D: Overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i></p> | <p>Legal minimum: 150% for overtime in weekdays and weekends. Overtime premium for national/religious holidays is 200% (The employee gets one day salary for the related national holiday even though she /he does not work on this day. If she / he works, then additional</p> | <p>D1: Legal minimum: 150% for overtime in weekdays and weekends. Overtime premium for national/religious holidays is 200% (The employee gets one day salary for the related national holiday even though she /he does not work on this day. If she / he works,</p> | <p>D2: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> |

| | | | |
|--|---|---|--|
| | 1 day salary is given to him / her; so, the rate totally paid to him / her became 200% in case of doing overtime in national /religious holidays) | then additional 1 day salary is given to him / her; so, the rate totally paid to him / her became 200% in case of doing overtime in national /religious holidays) | |
|--|---|---|--|

| Wages analysis: (Click here to return to Key Information) | |
|---|---|
| A: Were accurate records shown at the first request? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| A1: If No , why not? | NA |
| B: Sample Size Checked <i>(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)</i> | 30 (3 months of each 10 employees) employees' time and payment records from April 2020(last paid month), August 2019(Peak month) and October 2019(non-peak month) were reviewed |
| C: Are there different legal minimum wage grades? If Yes , please specify all. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If Yes , please give details: NA |
| D: If there are different legal minimum grades, are all workers graded and paid correctly? | <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A D1: If No , please give details: NA |
| E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum? | <input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input checked="" type="checkbox"/> Above E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> (Gross- including subsistence allowance); 2324,70 TL (Net- including subsistence allowance) / month |
| F: Please indicate the breakdown of workforce per earnings: | F1: ___ % of workforce earning under minimum wage F2: <u>5</u> % of workforce earning minimum wage F3: <u>95</u> % of workforce earning above minimum wage |
| G: Bonus Scheme found: Please specify details: | Bonus Scheme found: <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i> NA |

| | | | |
|---|--|---|--|
| <p>H: What deductions are required by law e.g. social insurance? Please state all types:</p> | <p>Social insurances and Taxes</p> | | |
| <p>I: Have these deductions been made?</p> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <p>I1: Please list all deductions that have been made.</p> | <p>1. Social Insurances 2. Taxes Please describe: All of the above deductions have been made.</p> |
| | | <p>I2: Please list all deductions that have not been made.</p> | <p>1. NA 2. NA Please describe: All of the above deductions have been made.</p> |
| <p>J: Were appropriate records available to verify hours of work and wages?</p> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | |
| <p>K: Were any inconsistencies found? (if yes describe nature)</p> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <p>K1: Type</p> <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence: | |
| <p>L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)</p> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: All records reflect all time worked. | | |
| <p>M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i></p> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time: NA | | |
| <p>M2: If yes, what was the calculation method used.</p> | <input type="checkbox"/> ISEAL/Anker Benchmarks NA <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details: N/A | | |
| <p>N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).</p> | <input type="checkbox"/> Yes NA <input type="checkbox"/> No N1: Please give details: | | |

| | |
|---|---|
| <p>O: Are workers paid in a timely manner in line with local law?</p> | <p><input checked="" type="checkbox"/> Yes Workers are paid in a timely manner in line with local law. <input type="checkbox"/> No</p> |
| <p>P: Is there evidence that equal rates are being paid for equal work:</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: Equal rates are being paid for equal work</p> |
| <p>Q: How are workers paid:</p> | <p><input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain:</p> |

6: Working Hours are not Excessive

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

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

ETI

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

The factory adopted finger scan attendance system to record employees' clocking in and out hours. The regular working hours of all employees were from Monday to Friday; from 7:00 a.m. to 5:00 p.m. with two times 15-minute tea breaks at 9:00 a.m. and 3:00 p.m. respectively and 30 minutes lunch break at 12:00 p.m. Saturdays and Sundays were granted as weekly rest day.

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

Details: Time records, production records, employee & management interviews

Any other comments: None

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

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

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

| Working hours' analysis Please include time e.g. hour/week/month (Go back to Key information) | | |
|--|---|---|
| Systems & Processes | | |
| A. What timekeeping systems are used: time card etc. | Describe: The working hours were kept via finger scan attendance system. | |
| B: Is sample size same as in wages section? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details | |
| C: Are standard/contracted working hours defined in all contracts/employment agreements? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details: | |
| D: Are there any other types of contracts/employment agreements used? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: If YES, please complete as appropriate: | |
| | <input type="checkbox"/> 0 hrs <input type="checkbox"/> Part time <input type="checkbox"/> Variable hrs <input type="checkbox"/> Other | |
| | If "Other", Please define: | |
| | N/A | |
| E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes , please detail hours, %, types of workers affected and frequency Please give details: | |
| F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period? | F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain: | F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| | Maximum number of days worked without a day off (in sample): | |
| | According to the sampled time records of the employees, maximum number of days worked without a day of is 6. | |

| Standard/Contracted Hours worked | | |
|---|--|---|
| G: Were standard working hours over 48 hours per week found? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | G1: If yes, % of workers & frequency: NA |
| H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | H1: If yes, please give details: NA |
| Overtime Hours worked | | |
| I: Actual overtime hours worked in sample (State per day/week/month) | Highest OT hours: 18 hr./ monthly in April 2020 17,5 hr./ monthly in October 2019 10.5 hr./ monthly in August 2019 | |
| J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details: | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| K: Approximate percentage of total workers on highest overtime hours: | 50% | |
| L: Is overtime voluntary? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information | L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Worker interviews |
| Overtime Premiums | | |
| M: Are the correct legal overtime premiums paid? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium | M1: Please give details of normal day overtime premium as a % of standard wages: 150% for overtime in weekdays and weekends. Overtime premium for national/religious holidays is 200% (The employee gets one day salary for the related national holiday even though she/he does not work on this day. If she / he works, then additional 1 day salary is given to him / her; so the rate totally paid to him / her became 200% in case of doing overtime in national /religious holidays) |
| N: Is overtime paid at a premium? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | N1: If yes, please describe % of workers & frequency: All employees who work overtime is paid monthly in accordance with the law. |

| | |
|---|---|
| <p>O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.</p> | <p> <input type="checkbox"/> No NA <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other </p> <p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p> <p>NA</p> |
| <p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p> | <p> <input type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify) </p> <p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p> <p>NA</p> |
| <p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p> | <p> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: If yes, please give details: </p> |
| <p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p> | <p> <input type="checkbox"/> Yes NA <input type="checkbox"/> No </p> |

7: No Discrimination is Practiced

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

As informed by interviewed employees, most employees spoke highly of the facility owner. Employees stated that they were paid equal for equal job in the facility. Anti-discrimination procedure on hiring, compensation, promotion and access to training is available during the audit. There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases.

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

Details:

- Personnel files
- Pay slips
- Disciplinary policy
- Company social compliance policy
- Employee interview
- Any other comments:
- None

| | |
|---|---|
| <p>A: Gender breakdown of Management + Supervisors (Include as one combined group)</p> | <p>A1: Male: <u>63</u> % A2: Female <u>37</u> %</p> |
| <p>B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:</p> | <p>#2</p> |
| <p>C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:</p> | <p> <input type="checkbox"/> Hiring NA <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input type="checkbox"/> No evidence of discrimination found </p> <p>C1: Please give details:</p> |

Professional Development

| | |
|---|--|
| A: What type of training and development are available for workers? | Discrimination policy and procedure training are given to employees. Also, discipline rules are explained. |
|---|--|

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

Non-compliance:

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

Observation:

| | |
|---|---|
| Description of observation: None observed Local law or ETI requirement: Not applicable Recommended corrective action: Not applicable | Objective evidence observed: NA |
|---|---|

Good Examples observed:

| | |
|---|---|
| Description of Good Example (GE): None observed | Objective evidence observed: NA |
|---|---|

8: Regular Employment Is Provided

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

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

ETI

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current systems:

All employees were recruited by the facility directly. No labour agency was used to hire employees. No temporary employee, apprenticeship schemes or home employee was identified by the auditors. No subcontractors were used. All employees had received copies of signed labour contracts.

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

Details:

- The hiring and termination practices
- Personal files
- Payroll records were provided for review.

Any other comments:

None

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

| Observation: | |
|--|---|
| <p>Description of observation: None observed</p> <p>Local law or ETI requirement: Not applicable</p> <p>Recommended corrective action: Not applicable</p> | <p>Objective evidence observed: NA</p> |

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

Responsible Recruitment

| All Workers | |
|---|--|
| <p>A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?</p> | <p><input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions</p> <p>A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:</p> |
| <p>B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>B1: If yes, please describe details and specific category(ies) of workers affected:</p> |

| | |
|----------------------------------|--|
| C: If yes, check all that apply: | <input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – C1: If other, please give details: |
| D: If any checked, give details: | NA |

| Migrant Workers: | |
|---|--|
| <i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i> | |
| A: Type of work undertaken by migrant workers: | There was no migrant employee at the facility. |
| B: Please give details about recruitment agencies for migrant workers: | B1: Total number of (in country recruitment agencies) used: NA B2: Total number of (outside of local country) recruitment agencies used: NA |
| C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker? | <input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: C2: Observations: NA |
| D: Are Any migrant workers in skilled, technical, or management roles <i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i> | <input type="checkbox"/> Yes NA <input type="checkbox"/> No D1: If yes, number and example of roles: |

NON-EMPLOYEE WORKERS

| Recruitment Fees: | |
|----------------------------------|--|
| A: Are there any fees? | <input type="checkbox"/> Yes NA <input type="checkbox"/> No |
| B: If yes, check all that apply: | <input type="checkbox"/> Recruitment / hiring fees NA <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other B1 – If other, please give details: |
| C: If any checked, give details: | NA |

| Agency Workers (if applicable) <i>(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)</i> | |
|--|--|
| A: Number of agencies used (average): | A1: Names if available: NA |
| B: Were agency workers' age / pay / hours included within the scope of this audit? | <input type="checkbox"/> Yes <input type="checkbox"/> No NA |
| C: Were sufficient documents for agency workers available for review? | <input type="checkbox"/> Yes <input type="checkbox"/> No NA |
| D: Is there a legal contract / agreement with all agencies? | <input type="checkbox"/> Yes <input type="checkbox"/> No NA |

| | |
|---|--|
| | D1: Please give details: |
| E: Does the site have a system for checking labour standards of agencies? If yes, please give details. | <input type="checkbox"/> Yes <input type="checkbox"/> No NA E1: Please give details: |

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

8A: Sub-Contracting and Homeworking

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

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

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

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

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems:

The company is not working with any sub-contractors; all processes are carried out within the company.

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

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

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

Details: None

Non-compliance:

1. Description of non-compliance:

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

Local law and/or ETI requirement: Not applicable

Recommended corrective action: Not applicable

Recommended corrective action: Not applicable

Objective evidence observed:

NA

Observation:

Description of observation: None observed

Local law or ETI requirement: Not applicable

Comments: Not applicable

Objective evidence observed:

NA

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

| Summary of sub-contracting – if applicable | |
|--|---|
| <input checked="" type="checkbox"/> Not Applicable please x | |
| A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting | <input type="checkbox"/> Yes <input type="checkbox"/> No A1: Please describe: NA |
| B: If sub-contractors are used, is there evidence this has been agreed with the main client? | <input type="checkbox"/> Yes <input type="checkbox"/> No B1: If Yes , summarise details: NA |
| C: Number of sub-contractors/agents used: | 0 |
| D: Is there a site policy on sub-contracting? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If Yes , summarise details: There were procedure and policy and posted for workers. |
| E: What checks are in place to ensure no child labour is being used and work is safe? | Employees personal records are kept in the facility. |

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

| | |
|---|--|
| E: How does the site ensure worker hours and pay meet local laws for homeworkers? | NONE |
| F: What processes are carried out by homeworkers? | NA |
| G: Do any contracts exist for homeworkers? | <input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: NA |
| H: Are full records of homeworkers available at the site? | <input type="checkbox"/> Yes <input type="checkbox"/> No NA |

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

ETI

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

Additional elements:

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

| | |
|---|---|
| <p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: 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 for reporting grievances.</p> |
| <p>B: If Yes, are workers aware of these channels and have access? Please give details.</p> | <p>Workers are aware of these channels. There are published, anonymous and / or open channels available for reporting any violations of Labour standards.</p> |
| <p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p> | <p>Suggestion boxes, employee representative, open door policy.</p> |
| <p>D: Which of the following groups is there a grievance mechanism in place for?</p> | <p><input checked="" type="checkbox"/> Workers <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input type="checkbox"/> Other D1: Please give details: Suggestion box, employee representative, open door policy are used for employees. Also, the facility has a hotline that is posted on the entrance of the facility building for external communities.</p> |
| <p>E: Are there any open disputes?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: If yes, please give details: The facility records open disputes and takes necessary actions.</p> |
| <p>F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: If no, please give details:</p> |
| <p>G: Is there a published and transparent disciplinary procedure?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain</p> |

| | |
|--|--|
| <p>H: If yes, are workers aware of these the disciplinary procedure?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>H1: If no, please give details</p> |
| <p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>I1: If yes, please give details NA</p> |

Current Systems and Evidence Examined

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

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

Details:
 Disciplinary regulation of the facility and the personnel files of the sampled employees were reviewed.
 Employee interviews were conducted
 The relevant policy on prevention of harassment and abuse
 Internal grievance procedure documentation.
 Training records
 Any other comments:
 None

Non-compliance:

| | |
|--|---|
| <p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law: <input type="checkbox"/> NC against customer code: None observed</p> <p>Local law and/or ETI requirement: Not applicable</p> <p>Recommended corrective action: Not applicable</p> | <p>Objective evidence observed: (where relevant please add photo numbers)</p> <p>NA</p> |
|--|---|

| Observation: | |
|---|---|
| Description of observation: None observed Local law or ETI requirement: Not applicable Recommended corrective action: Not applicable | Objective evidence observed: NA |

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

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

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

Additional Elements

10A.1 Only workers with a legal right to work shall be employed or used by the supplier.
 10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

Current Systems and Evidence Examined

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

Current systems:

All employees are local employees.

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

Details:

ID copies and social security registrations of the sampled employees were reviewed
 Any other comments: None

Non-compliance:

1. Description of non-compliance:

NC against ETI NC against Local Law: NC against customer

code:
None

Local law and/or ETI requirement: N/A

Recommended corrective action: Nil

Objective evidence

observed:

N/A

Observation:

Description of observation: None observed

Local law or ETI requirement: Not applicable

Comments: Not applicable

Objective evidence

observed:

NA

| Good examples observed: | |
|---|------------------------------------|
| Description of Good Example (GE): None observed | Objective evidence observed: NA |

10. Other issue areas 10B4: Environment 4–Pillar
[\(Click here to return to summary of findings\)](#)
To be completed for a 4–Pillar SMETA Audit and remove the previous page which is 10B2 environment 2 pillar

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

B4. Guidance for Observations
 10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.
 10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.

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

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

Current systems:
 The facility is aware of clients’ and environmental requirements.
 There is a written environment policy of the facility.
 The facility has environment permit letter.

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

Document review,
Employee and management interview
Details:
None

Non-compliance:

1. Description of non-compliance:

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

Objective evidence observed:
N/A

Local law and/or ETI requirement: N/A

Recommended corrective action: Nil

Observation:

Description of observation: None.

Local law or ETI requirement: N/A

Comments: Nil.

Objective evidence observed:
N/A

Good examples observed:

Description of Good Example (GE):
None

Objective evidence observed:
N/A

Environmental Analysis

(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)

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

Mr. Mahmut Bak – Factory manager

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

Yes No
B1: Please give details:
Environmental Aspect & Impact analysis Table has been documented.

| | |
|---|--|
| <p>C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No NA</p> |
| <p>D: Does the site have an Environmental policy? <i>(For guidance, please see Measurement criteria)</i></p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, is it publicly available? Yes Integrated Management System Policy is available.</p> |
| <p>E: If yes, does it address the key impacts from their operations and their commitment to improvement?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The Integrated policy has been included key impacts from our operations and commitment to improvement.</p> |
| <p>F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i></p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> |
| <p>G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please gives details. <i>(For guidance, please see Measurement criteria)</i></p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details:</p> |
| <p>H: Have all legally required permits been shown? Please gives details.</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Evaluation list of compliance with legal and other requirements</p> |
| <p>I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Details: MSDS have been documented and distributed to the relevant departments.</p> |
| <p>J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The facility has a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues.</p> |
| <p>K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Our targets have been determined in the 2020 – 2024 Strategic Plan. Example: reduction of energy consumption (electricity, natural gas, water ...), natural resource consumption</p> |
| <p>L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> |
| <p>M: Does the facility have a system in place for accurately measuring and monitoring consumption</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The water, natural gas and electricity</p> |

| of key utilities of water, energy and natural resources that follows recognised protocols or standards? | consumption are monitored daily with additional meters. | |
|---|---|---|
| N: Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Necessary environmental audits have been carried out in the company that receives our recycled waste from our facility. | |
| Usage/Discharge analysis | | |
| Criteria | Previous year: Please state period: 2019 | Current Year: Please state period: 2020 |
| Electricity Usage: Kw/hrs | 177.026 kWh | 164.000 kWh |
| Renewable Energy Usage: Kw/hrs | - | - |
| Gas Usage: Kw/hrs | 60.438.120 Kw/year | 51.550.131 Kw/year |
| Has site completed any carbon Footprint Analysis? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| If Yes , please state result | | |
| Water Sources: Please list all sources e.g. lake, river, and local water authority. | City water Well water | City water Well water |
| Water Volume Used: (m ³) | 241472 m ³ | 205264 m ³ |
| Water Discharged: Please list all receiving waters/recipients. | Organized Industrial Zone Sewerage System | Organized Industrial Zone Sewerage System |
| Water Volume Discharged: (m ³) | 150000 m ³ /year | 103000 m ³ /year |
| Water Volume Recycled: (m ³) | 91472 m ³ | 104964 m ³ |
| Total waste Produced (please state units) | All departments | All departments |
| Total hazardous waste Produced: (please state units) | 22.975 kg | 17.898 kg |
| Waste to Recycling: (please state units) | 958.067 kg | 807.247 kg |
| Waste to Landfill: (please state units) | Non-hazardous waste area | Non-hazardous waste area |

| | | |
|---|-----------------------|-----------------------|
| | Hazardous waste area | Hazardous waste area |
| Waste to other: <i>(please give details and state units)</i> | NA | NA |
| Total Product Produced <i>(please state units)</i> | 19.126.104 pcs / year | 17.059.042 pcs / year |

10C: Business Ethics – 4-Pillar Audit

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

To be completed for a 4-Pillar SMETA Audit

10C. Compliance Requirements

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

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

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

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

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

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

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

10C. Guidance for Observations

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

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

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

Current Systems and Evidence Examined

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

Current systems:

The facility conducts their business ethically without bribery, corruption, or any type of fraudulent Business Practice. Businesses meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices. The facility has a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice.

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

Document review,

Employee and management interview

Details:

None

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

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

| Good examples observed: | |
|--|--|
| <p>Description of Good Example (GE): None</p> | <p>Objective evidence observed: N/A</p> |

| | |
|--|--|
| <p>A: 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>A1: Please give details: The facility has a Business Ethics Policy and the policy was communicated and applied internally, externally.</p> |
| <p>B: 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>B1: Please give details: The site gives training to relevant personnel on business ethics issue.</p> |
| <p>C: Is the policy updated on a regular (as needed) basis?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>C1: Please give details: There is updated business ethics policy.</p> |
| <p>D: Does the site require third parties including suppliers to complete their own business ethics training</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D1: Please give details: The facility has a Business Ethics Policy and the policy was communicated and applied internally, externally.</p> |

| <p style="text-align: center;">Other Findings Outside the Scope of the Code</p> | |
|--|--|
| <p>NONE</p> | |

| <p style="text-align: center;">Community Benefits <i>(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)</i></p> | |
|---|--|
| <p>NONE</p> | |

Appendix 1

| | |
|--|--|
| <p>Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."</p> <p><input checked="" type="checkbox"/> Not Applicable please x</p> | |
| <p>NOTE: The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.</p> | <p>Instruction to Audit Company: fill in the relevant clauses from the Customer Supplier Code - where applicable.</p> |
| <p>ETI Code / Additional Elements</p> | <p>Customer's Supplier Code equivalent</p> |
| <p>0.A. Universal Rights covering UNGP</p> | <p>0.A. Universal Rights covering UNGP</p> |
| <p>0.A. Guidance for Observations 0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers. 0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights 0.A.3 Businesses shall identify their stakeholders and salient issues. 0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights. 0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation. 0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.</p> | <p>-</p> |
| <p>0.B. Management Systems & Code Implementation</p> | <p>0.B. Management Systems & Code Implementation</p> |
| <p>0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p> | <p>-</p> |

| | |
|--|--|
| <p>0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.</p> <p>0.3 Suppliers are expected to communicate this Code to all employees.</p> <p>0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</p> | |
| <p>ETI 1. Forced Labour</p> | <p>ETI 1. Forced Labour</p> |
| <p>1.1 There is no forced, bonded or involuntary prison labour.</p> <p>1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.</p> | <p>-</p> |
| <p>ETI 2. Freedom of association and the right to collective bargaining are respected</p> | <p>ETI 2. Freedom of association and the right to collective bargaining are respected</p> |
| <p>2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</p> <p>2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</p> <p>2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.</p> <p>2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.</p> | <p>-</p> |
| <p>ETI 3. Working conditions are safe and hygienic</p> | <p>ETI 3. Working conditions are safe and hygienic</p> |
| <p>3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.</p> <p>3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.</p> | <p>-</p> |

| | |
|--|--|
| <p>3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.</p> <p>3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.</p> | |
| <p>ETI 4. Child labour shall not be used</p> | <p>ETI 4. Child labour shall not be used</p> |
| <p>4.1 There shall be no new recruitment of child labour.</p> <p>4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.</p> <p>4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.</p> <p>4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.</p> | <p>-</p> |
| <p>ETI 5. Living wages are paid</p> | <p>ETI 5. Living wages are paid</p> |
| <p>5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.</p> <p>5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.</p> <p>5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.</p> | <p>-</p> |
| <p>ETI 6. Working Hours are not excessive</p> | <p>ETI 6. Working Hours are not excessive</p> |
| <p>6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.</p> <p>6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.</p> | <p>-</p> |

| | |
|--|---|
| <p>6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.</p> <p>6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.</p> <p>6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where all of the following are met:</p> <ul style="list-style-type: none"> - this is allowed by national law; - this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce; - appropriate safeguards are taken to protect the workers' health and safety; and - The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies. <p>6.6 Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.</p> | |
| <p>ETI 7. No discrimination is practised</p> | <p>ETI 7. No discrimination is practised</p> |
| <p>7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.</p> | <p>-</p> |
| <p>ETI 8. Regular employment is provided</p> | <p>ETI 8. Regular employment is provided</p> |
| <p>8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p>8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or</p> | <p>-</p> |

| | |
|---|--|
| <p>provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.</p> <p>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.</p> | |
| <p>8A: Sub-Contracting and Homeworking</p> | <p>8A: Sub-Contracting and Homeworking</p> |
| <p>8A.1 There should be no sub-contracting unless previously agreed with the main client. 8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.</p> | <p>-</p> |
| <p>ETI 9. No harsh or inhumane treatment is allowed</p> | <p>ETI 9. No harsh or inhumane treatment is allowed</p> |
| <p>9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. Additional elements: 9.2 companies should provide access to a confidential grievance mechanism for all workers</p> | <p>-</p> |
| <p>10. Other Issue areas: 10A: Entitlement to Work and Immigration</p> | |
| <p>Additional Elements 10A.1 Only workers with a legal right to work shall be employed or used by the supplier. 10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.</p> | <p>-</p> |

| 10. Other issue areas 10B2: Environment 4–Pillar | |
|---|---|
| <p>10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.</p> <p>10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.</p> <p><i>Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.</i></p> | - |

Photo Form

| | | |
|------------------------|---------------------------|---------------------------|
| | | |
| <p>Factory outview</p> | <p>Factory name board</p> | <p>Production floor</p> |
| | | |
| <p>Warehouse</p> | <p>Emergency Lights</p> | <p>Assembling Area</p> |
| | | |
| <p>H&S Notices</p> | <p>First-aid kits</p> | <p>Fire extinguishers</p> |

| | | |
|--|------------------------|--|
| | | |
| <p>Kitchen</p> | <p>Eating area</p> | <p>Drinking water</p> |
| | | |
| <p>Toilets</p> | <p>Lockers</p> | <p>Hygiene Barrier</p> |
| | | |
| <p>PPE Usage (mask, gloves, cap and apron)</p> | <p>Code of Conduct</p> | <p>Suggestion Boxes & Notice Board</p> |



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:](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

[http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

[Click here for Supplier \(B\) members:](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)

[http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)

[Click here for Auditors:](https://www.surveymonkey.co.uk/r/BRTVCKP)

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