

Sedex Members Ethical Trade Audit Report



Audit Details								
Sedex Company Reference: (only available on Sedex System)				Sedex Site Re (only available of			ZS415438447	
Business name Alya Fruit and Food Production Marketing Industry and (Company name):						nd Trac	le LTD Sti	
Site name:		Alya Fruit and Foo	od Produ	iction and Mar	keting Co			
Site address:		Ahmetbey Mah. Nilfer Cad. No: 295 Osmangazi BURSA 16190 TR		Country:		TR	TR	
Site contact and jo	ob title:	CEREN KARAMAN	/ QUALI	TY ASSURANC	E LEGAL AFF	AIRS MA	NAGER	
Site phone:		0224 211 5050		Site e-mail:		info@alyafruit.com.tr		
SMETA Audit Pillars:		☑ Labour Standards		Health and Safety (plus Environment 2-Pillar)	Enviro 4-pillaı		Business Ethics	
Date of Audit:		2024-05-20						
		Aı	udit Com	pany Name:				
			Intertel	k Turkey				
Audit Conducted By								
Affiliate Audit Company	\checkmark	Purchase	er		Retaile	•		
Brand owner		NGO			Trade (Jnion		
Multi-				Combined A	udit (select a	l that a	oply)	

Audit Content:

- (1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 (March 2019) was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.
- (2) The audit scope was against the following reference documents

2-Pillar SMETA Audit

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

4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)
- (3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

SMETA Declaration

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

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

Auditor Team						
Lead Auditor:	MELİS OKTAY	APSCA Number:	32200319			
Additional Auditors:						
Date of declaration:	2024-05-20					

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

Site Representation					
Full Name:	CEREN KARAMAN				
Title:	QUALITY ASSURANCE LEGAL AFFAIRS MANAGER				
Date of declaration:	2024-05-20				

Comments:

Any exceptions to this must be recorded here (e.g. different sample size):
Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020).
The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed

upon with the factory representatives

NONE

Audit company: **Intertek Turkey**

Report reference:

Start Date:

End Date:

Summary of Findings

Issue	Area of Non–Conformity		Nun	nber of iss	sues	Findings
(please click on the issue title to go direct to the appropriate audit results by clause)	ETI	Local Law	NC	Obs	GE	
0A - Universal rights covering UNGP			0	0	0	
0B - Management systems and code implementation	0.B.1 0.B.4	§1	2	0	0	NC - ZAF600473931 NC - ZAF600473936
1 - Freely chosen employment			0	0	0	
2 - Freedom of association and right to collective bargaining are respected			0	0	0	
3 - Working conditions are safe and hygienic	3.1 3.1 3.2	§2 §3 §4	3	0	0	NC - ZAF600473929 NC - ZAF600473930 NC - ZAF600473932
4 - Child labour shall not be used			0	0	0	
5 - Living wages are paid	5.1 5.1	§5 §6	2	0	1	NC - ZAF600473933 NC - ZAF600473934 GE - ZAF600492110
6 - Working hours are not excessive	6.1	§7	1	0	0	NC - ZAF600473935
7 - No discrimination is practiced			0	0	0	
8 - Regular employment is provided			0	0	0	
8A - Subcontracting and homeworking			0	0	0	
9 - No harsh or inhumane treatment is <u>allowed</u>			0	0	0	
10A - Entitlement to work and immigration			0	0	0	
10B2 - Environment 2-pillar			0	0	0	
10B4 - Environment 4-pillar			0	0	0	
10C - Business ethics 4-pillar			0	0	0	

Local Law Issues

Issue	Description
§1	Regulation for facility opening and operating permit (10/8/2005), II. Section Art 6 (Changed first clause: 19/3/2007 – 2007/11882 K.) – It is not allowed that the facility are not opened and operated without "Opening and Operating Permit" that is taken from local authorities properly
§2	REGULATION ON OPENING AND WORKING LICENSE (10/8/2005) - II. chapter The companies that are given a business opening and operating permit must meet the following conditions: Article 5 h) Public recreation and entertainment places; workplaces where explosive, flammable and combustible substances are produced, sold and stored; All kinds of workplaces with more than thirty employees, the main entrance gates outside the street and the street and the direct connection of more than one workplace in a business office, bazaar and similar workplaces to take the necessary fire prevention report showing that the fire is taken, in other workplaces necessary measures against fire to be taken.

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§3	In accordance with the Regulation on Laboratories which conduct measurement, test and analyse on Labour Hygiene, Date: 20.08.2013, No: 28741; Art. 5 – (1) Employer shall protect the employee against the dangers and hazardous impacts of workplace conditions and any processed, used or existed substance. To provide a safety workplace; employer shall conduct measurement, test, analyse and evaluations on physical, chemical, and biological impacts about personnel exposure on workplace or workplace conditions.
§4	In accordance with Turkish Regulation about Occupational Health and Safety circumstances using work equipments (25/04/2013) No: 28628, Appendix 2 2.1. Self moved equipments should be used by the employees who takes the proper training.
§5	ILO General principles and operational guidelines for fair recruitment and Definition of recruitment fees and related costs: For the purpose of this definition of recruitment fees and related costs, the definitions of the General Principles and Operational Guidelines apply. The term "workers" includes jobseekers. OCCUPATIONAL HEALTH AND SAFETY LAW#6331(20/6/2012) ARTICLE 15 – (1) The employer does the following: a) Ensures that the employees are subjected to health surveillance, by taking into account the health and safety risks that they would encounter at the workplace; b) In the following cases, they must ascertain that the employees' medical checkups are done: 1) When they start the job; 2) When they change their job; 3) When after repeated leaves because of an industrial accident, occupational disease or health issued, they request to return to the job; 4) Throughout the employment, at regular interval as decided by the Ministry according to the qualifications of the employee, the nature of the work and the danger class of the workplace. (2) Those who will work at hazardous and very hazardous class workplaces will not be allowed to start work until they get a health report verifying that are medically fit for the job. (3) Medical reports that must be obtained as a requirement under this Law must be obtained at the workplace health and safety unit or from the workplace doctor that works at the joint health and safety unit from which service is procured. Objections to the reports must be submitted to the arbitrator hospitals that are selected by the Ministry of Health, and their decisions will be final. (4) All costs of the health surveillance and all additional cost that is incurred because of such surveillance will be borne by the employer, and the employee will not be charged for them. (5) Medical details of the employee who has been examined will be kept confidential respecting the right of privacy.
§6	In accordance with The Turkish Regulation on Overtime and Extra Work art 10 Employer is obligated to arrange a document that indicates the extra working and overtime hours and keep a signed copy of this document in employees' personnel files. The overtime and extra works payments included with normal working hours payment that are given to employees are paid according to Turkish Labor Law #4857/Article 32-34, This payment has to be clearly shown on payroll documentation and on pay slips, which are given to employees according to Turkish Labor Law #4857/Article 37.
§7	In accordance with The Turkish Regulation on Overtime and Extra Work art 10 Employer is obligated to arrange a document that indicates the extra working and overtime hours and keep a signed copy of this document in employees' personnel files. The overtime and extra works payments included with normal working hours payment that are given to employees are paid according to Turkish Labor Law #4857/Article 32-34, This payment has to be clearly shown on payroll documentation and on pay slips, which are given to employees according to Turkish Labor Law #4857/Article 37.

2024-05-20

Site Details

	Site Details				
Company Name	Alya Fruit and Food Production Marketing Industry and Trade LTD Sti				
Site Name	Alya Fruit and Food F	Production	and Marke	ting Co	
GPS location (if available)	GPS Address:		Ahmetbey Mah. Nilfer Cad. No: 295 Osmangazi BURSA		
	Coordinates:			9587323435, 484076328	
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	There is no opening refer to findings.	and operat	ing permit	in the facility. Please	
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	The facility provides sorting, packing, war	fig, blueber rehousing 8	rry and che & shipment	erry. There are t processes.	
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	ALYA Meyve ve Gida Üretim Pazarlama San. ve Tic Ltd. Şti. was established in 2018 and operates at the current address since 2011. The facility packs blueberry, cherry & fig. There is 1 main building including lockers, packing area, sorting area, cold storages. Administration, toilets are in containers located in the yard. The total closed area of the production building is 1000 sqm. The building is constructed in 2006 with mixed structure of prefabricated & concrete structure.				
Structure and number of buildings	Building Name:		1		
	Floor	Description	n	Remark	
	0	Offices		None	
	1	Offices		None	
	Building Name:	•	2		
	Floor	Description	n	Remark	
	0 Packaging and None warehouses, changing rooms			None	
Visible structural integrity issues (large cracks) observed?	☐ Yes ☑ No				
c. delia) ebbel vedi	Please give details:				
	It was not observed during the site tour.				
Does the site have a structural engineer evaluation?	☑ Yes □ No				
	Please give details:				
There is building occupancy pe				facility.	

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Site function	□ Agent	☑ Factory Processing/Manufacturer				
	☐ Finished Product Supplier	☐ Grower				
	□ Homeworker	☐ Labour Provider				
	□ Pack house	□ Primary Producer				
	☐ Service Provider	☐ Sub-contractor				
Months of peak season	September to October					
Process overview	Packing of fig, blueberry. 12 CO (150 KW) 16 HOUSEHOLD COOL TRANSPALETTS 1 Piece STILL V FORKLIFT (7 KW) 5 RIBBON BIN TRANSFORMER (400 KW) 1 DIES SELECTION SORTING MACHINE	.ING UNITS (200 KW) 6 X 5015 BRAND BATTERY DING MACHINES 1 ELECTRICAL EL GENERATOR (200 KW) 1				
What form of worker representation is there on site?	☐ Union☑ Other	☐ Worker Committee☐ None				
Please give details:	There were freely elected works	er representatives on-site.				
Is there any night production work at the site?	☐ Yes ☑ No					
Are there any on site provided worker	☐ Yes ☑ No					
accommodation buildings	Please give details:					
Are there any off site provided worker accommodation buildings	☐ Yes ☑ No					
accommodation buildings	Please give details:					
Were all site provided accommodation buildings included in this audit	☐ Yes ☑ No					
bullulings included in this addit	Please give details:					
	No accommodation building in	the facility.				

Audit Parameters							
Time in and time out	Day 1						
	In	09:30					
	Out	18:30					
Audit type:	PERIODIC						
Was the audit announced?	ANNOUNCED						
Was the Sedex SAQ available for review?	Yes						
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No						
Who signed and agreed CAPR	CEREN KARAMAN / QUALITY ASSURANCE LEGAL AFFAIRS MANAGER						
Is further information available	No						

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Audit attendance	Management	Worker Representatives				
	Senior management	Worker Committee representatives	Union representatives			
A: Present at the opening meeting?	Yes	Yes	No			
B: Present at the audit?	Yes	Yes	No			
C: Present at the closing meeting?	Yes	Yes	No			
Reason for absence at the opening meeting	There is no Union in the facility.					
Reason for absence during the audit	There is no Union in the facility.					
Reason for absence at the closing meeting	There is no Union in the fa	acility.				

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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*			
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	workers	Total
Worker numbers – male	1	1	0	0	0	0	0	2
Worker numbers – female	1	15	0	0	0	0	0	16
Total	2	16	0	0	0	0	0	18
Number of Workers interviewed – male	0	1	0	0	0	0	0	1
Number of Workers interviewed – female	1	8	0	0	0	0	0	9
Total – interviewed sample size	1	9	0	0	0	0	0	10

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	Nationalities Structure					
Nationality of Management	Turkish					
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1: Turkish	approx %: 100%				
Was this list completed during peak season?	☐ Yes ☑ No					
season.	Please give details:					
	Employees' number can change in peak season by hiring new employees.					
Worker remuneration	Workers on piece rate:	0%				
	Paid hourly:	100%				
	Salaried:	0%				
Payment cycle	Paid daily:	0%				
	Paid weekly:	0%				
	Paid monthly:	100%				
	Other:	0%				
	Details for other:	NA				

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Worker Interview Summary		
Were workers aware of the audit?	☑ Yes □ No	
Were workers aware of the code?	☑ Yes □ No	
Number of group interviews:	1 group X 4 employees	
Number of individual interviews:	Male: 1 Female: 5	
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.	☑ Yes □ No Please give details:	
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	☑ Yes □ No	
In general, what was the attitude of the workers towards their workplace?	☑ Favorable ☐ Non-favourable ☐ Indifferent	
What was the most common worker complaint?	None	
What did the workers like the most about working at this site?	Working environments, payments on time, management attitude.	
Any additional comment(s) regarding interviews:	None	
Attitude of workers to hours worked:	Workers are happy regarding working hours.	
Is there any worker survey information available?	☐ Yes ☑ No Please give details:	

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Attitude of workers:

The general attitude of employee was positive. They were pleased about the attitude of managers and the working environment. They are always paid on time. There is no harassment, discrimination, abuse or forced labour.

Attitude of worker's committee/union reps:

There was no union in the facility. There was 1 worker representative at the facility. 1 worker representative was included in employee interviews. No negative comment was noted during the worker representative interview.

Attitude of managers:

Management was helpful, transparent and cooperative during the audit process.

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

OA: Compliance Requirements

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

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

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:

Social compliance responsible is authorized as is ESIN MERIC/HR AND ADMINISTRATIVE AFFAIRS RESPONSIBLE. The facility has social compliance policy and procedures that includes supplier management. The facility management has posted ETI Base code on the notice board. The facility has grievance mechanism for internal partners and external partners.

Evidence examined:

Social compliance policy and related procedures, Authorization letter of social compliance responsible, Supplier and Subcontractors choosing and evaluating procedure, Grievance Mechanism Feedbacks,

Management Interview, Employees Interviews, Site tour
Any other comments:
NONE

Policy statement that expresses commitment to respect human rights?	☑ Yes □ No
communicate to respect mannar rights:	Please give details:
	The facility has detailed social compliance policy that includes human rights.
Are the policies included in workers' manuals?	☐ Yes ☑ No
	Please give details:
	The facility has a detailed health & safety procedure and this procedure is explained in health and safety trainings to employees.
Does the business have a designated person responsible for implementing	☑ Yes □ No
standards concerning Human Rights?	Please give details:
	ESIN MERIC/HR AND ADMINISTRATIVE AFFAIRS RESPONSIBLE

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Does the business have a transparent system in place for confidentially	☑ Yes □ No	
reporting, and dealing with human rights impacts without fear of reprisals towards	Please give details:	
the reporter?	the facility to enable external st	ommunicated system in place at
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	☑ Yes □ No	
Does the business demonstrate effective data privacy procedures for workers'	☑ Yes □ No	
information, which is implemented?	Please give details:	
	The facility has detailed privacy information. Also, the feedback boxes are evaluating by the maway.	s getting from suggestion
Me	easuring Workplace Impact	
Annual worker turnover(Number of	Last year	95.45%
workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	This year	4.16%
Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	4.76%	
Annual % absenteeism(Number of days	Last year	0.0%
lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	This year	0.0%
Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month)	0.0%	
Are accidents recorded?	☑ Yes □ No	
	Please give details:	
	All accidents are recorded	

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Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year This year	0.0%
Quarterly (90 days) number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	0.0%	
Lost day work cases per 100	Last year	0.0%
workers([(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	This year	0.0%
% of workers that work on average more	6 month	0.0%
than 48 standard hours / week in the last 6 / 12 months	12 month	0.0%
% of workers that work on average more	6 month	0.0%
than 60 total hours / week in the last 6 / 12 months	12 month	0.0%

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OB - Management Systems and code Implementation [Summary of Findings]

OB: Compliance Requirements

0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code. 0.B.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.

0.B.3 Suppliers are expected to communicate this Code to all employees.
0.B.4 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with. 0.B.5 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

Current Systems	and	Evidence	Examined
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record what controls and processes are currently in place e.g. record what policies are in place, what relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.
Current Systems:
The facility has disciplinary procedures and work rules. All posted onsite. All social compliance issues are managed and monitored internally. The facility management has already posted ETI Base code on notice boards. Overall responsibility for meeting the standards is taken by ESIN MERIC/HR AND ADMINISTRATIVE AFFAIRS RESPONSIBLE
Evidence examined:
Management interview Employees' interviews Training records Company policies
Any other comments:
NONE

Management Systems		
In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	☐ Yes ☑ No	
non-compliance to any regulations:	Please give details: No fines/prosecutions.	
De callisia a callana canada canada callante	•	
Do policies and/or procedures exist that reduce the risk of forced labour, child	☑ Yes □ No	
labour, discrimination, harassment &	Please give details:	
abuse?	Policies and procedures about reducing the risk of forced labour, child labour, discrimination and harassment &abuse are in place.	
If Yes, is there evidence (an indication) of effective implementation? Please give details.	Policies exist for all areas (Forced labour, Health and Safety, Wages, Working Hours, and No harsh treatment, Environment, Business Ethics, Child Labour, Recruitment, Discrimination and Sub-contracting.), these are communicated to workers via poster. Through documents review and workers interview, policy on 'No harsh treatment and Environment' was fully in compliance with the code. Workers stated no forced labour, no child labour was found (through interview and document checks), there were both female and male among management/supervisors.	

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Have managers and workers received training in the standards for forced	☑ Yes □ No	
labour, child labour, discrimination,	Please give details:	
harassment & abuse?	These policy and procedures are communicated to the all staff through posters.	
If Yes, is there evidence (an indication) that training has been effective e.g.	☑ Yes □ No	
training records etc.? Please give details	Please give details:	
	Training records are available.	
Does the site have any internationally recognised system certifications e.g. ISO	☐ Yes ☑ No	
9000, 14000, OHSAS 18000, SA8000 (or	Please give details:	
other social audits)?	NA	
Is there a Human Resources	☑ Yes □ No	
manager/department?	ESIN MERIC/HR AND ADMINISTRATIVE AFFAIRS RESPONSIBLE	
Is there a senior person /manager responsible for implementation of the	☑ Yes □ No	
code?	Please give details:	
	ESIN MERIC/HR AND ADMINISTRATIVE AFFAIRS RESPONSIBLE	
Is there a policy to ensure all worker information is confidential?	☑ Yes □ No	
information is confidential.	Please give details:	
	All worker information is kept on their personnel files. These files are kept on Administration office. There is also a Confidentiality Policy.	
Is there an effective procedure to ensure	☑ Yes □ No	
confidential information is kept confidential?	Please give details:	
	All worker information is kept on their personnel files. These files are kept on Administration office.	
Are risk assessments conducted to	☑ Yes □ No	
evaluate policy and procedure effectiveness?	Please give details:	
	Health and Safety Risk assessment includes policy and procedures effectiveness.	
Does the facility have a process to	☑ Yes □ No	
address issues found when conducting risk assessments, including	Please give details:	
implementation of controls to reduce identified risks?	The facility performs a corrective action plan for the findings that addressed on risk assessment.	
Does the facility have a policy/code which require labour standards of its own	☑ Yes □ No	
suppliers?	Please give details:	
	The facility has choosing and evaluating procedure for its suppliers.	
Land Rights		

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Does the site have all required land rights licenses and permissions (see	☐ Yes ☑ No
SMETA Measurement Criteria)?	Please give details:
	Please refer to findings
Does the site have systems in place to conduct legal due diligence to recognize	☑ Yes □ No
and apply national laws and practices	Please give details:
relating to land title?	The facility fulfils the requirements during getting facility opening and operating permit.
Does the site have a written policy and procedures specific to land rights?	☑ Yes □ No
procedures specific to failu rights:	Please give details:
	The facility main production processes is not risky regarding land rights.
Is there evidence that facility/site compensated the owner/lessor for the	☐ Yes ☑ No
land prior to the facility being built or	Please give details:
expanded?	There is no building occupancy permit in the facility. Please refer to findings.
Does the facility demonstrate that alternatives to a specific land acquisition	☑ Yes □ No
were considered to avoid or minimize	Please give details:
adverse impacts?	There is no land acquisition. In case a land acquisition, the facility applies to municipality and fulfil the obligations regarding environmental impact assessment etc.
Is there any evidence of illegal appropriation of land for facility building	☐ Yes ☑ No
or expansion of footprint?	Please give details:
	No such issue observed. There is no illegal appropriation of land for facility building.

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	Non-Compliance	Evidence
[Back to findings	summary]	
	Non-Compliance	
Status	OPEN	
Reference	ZAF600473931	
Clause	0B - Management Systems and code Implementation	
Issue Title	34 - Site is operating without all required in-date licences and permits (e.g. business / factory licence has expired)	
Subcategory	Site's licenses & Certifications	
New or carried over?	☐ New ☑ Carried Over	
Raised by audit	ZAA600022207	
Root cause	☐ Training ☑ System	
	☐ Costs ☐ Lack of workers	
	□ Other	
Root cause - Other		
Local law issue	Regulation for facility opening and operating permit (10/8/2005), II. Section Art 6 (Changed first clause: 19/3/2007 – 2007/11882 K.) – It is not allowed that the facility are not opened and operated without "Opening and Operating Permit" that is taken from local authorities properly	
ETI code	0.B.4 - Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with.	
Explanation to the non compliance	There is no opening & operating permit of the facility. //// İşletmenin açma ve çalıştırma ruhsatı mevcut değildir.	
Follow up method	☐ Follow up audit ☐ Desktop audit	
Timescale	□ Immediate □ 30 days □ 60 days	
	□ 90 days □ 120 days ☑ 180 days	
	□ 365 days □ Other	
Actions	Please provide opening & operating permit from municipality. //// Lütfen belediyeden açma ve çalıştırma ruhsatı sağlayınız.	

Audit company: Intertek Turkey

Report reference: ZAA600065990 2024-05-20 2024-05-20

Start Date: End Date:

	Non-Compliance	Evidence
[Back to findings	summary]	
	Non-Compliance	
Status	OPEN	
Reference	ZAF600473936	
Clause	0B - Management Systems and code Implementation	
Issue Title	5 - Falsified, duplicate or intentionally incomplete records including verified inconsistencies	
Subcategory	Audit process	
New or carried over?	☐ New ☐ Carried Over	
Raised by audit	ZAA600022207	
Root cause	☐ Training ☑ System	
	☐ Costs ☐ Lack of workers	
	□ Other	
Root cause - Other		
ETI code	0.B.1 - Suppliers are expected to implement and maintain systems for delivering compliance to this Code.	
Explanation to the non compliance	The management has to make improvement in management system in terms of providing accurate & complete records of working hours & wages. //// İşletmenin yönetim sisteminde doğru ve eksiksiz zaman ve ödeme kaydı sağlama konusunda iyileştirilm yapması gereklidir.	
Follow up method	☑ Follow up audit ☐ Desktop audit	
Timescale	☐ Immediate ☐ 30 days ☐ 60 days	
	□ 90 days □ 120 days □ 180 days	
	□ 365 days □ Other	
Actions	Please provide accurate, complete and consistent records. //// Lütfen eksiksiz, doğru ve tutarlı kayıt sağlayınız.	

Audit company: Intertek Turkey Report reference: ZAA600065990

Start Date: 2024-05-20

End Date: 2024-05-20

1 - Freely chosen Employment [Summary of Findings]

1: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

The factory has a policy against forced labour and the policy was reviewed by auditor. There was a non-formalised 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.

Overtimes are always performed on voluntary basis. 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 in management and worker interview.

☐ Yes ☑ No
Please give details:
☐ Yes ☑ No
Please give details:
□ Yes ☑ No
Please give details:
☑ Yes □ No
Please give details:
NA
☐ Yes ☐ No ☑ Not Applicable
Please give details:
NA

Audit company: **Intertek Turkey**

Report reference:

Start Date:

End Date:

Is there evidence of any restrictions on workers' freedoms to leave the site at the	☐ Yes ☑ No
end of the work day?	Please give details:
	NA
Does the site understand the risks of forced / trafficked / bonded labour in its	☑ Yes □ No □ Not Applicable
supply chain	Please give details:
	The facility has a procedure regarding this issue.
Is the site taking any steps taking to reduce the risk of forced / trafficked	☑ Yes □ No
labour?	Please give details:
	The facility has a procedure regarding this issue.

Report reference: ZAA600065990

Start Date: End Date: 2024-05-20 2024-05-20

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

2: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

There is no Trade 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.

express their opinions and they can share the issues with Worker Representative. There is 1 worker representative for general working conditions. Evidence examined: Management interview Worker interview Worker representative interview Suggestion box records Policy of the facility regarding Freedom of Association. Any other comments: NONE

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	☐ Union☐ Worker Committee☐ None		
Other details:	Open-door policy, worker representative, suggestion boxes		
Is it a legal requirement to have a union?	☐ Yes ☑ No		
Is it a legal requirement to have a worker's committee?	□ Yes ☑ No		
Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	 ✓ Yes □ No Please give details: Employees declared that they can go directly to the management for their suggestions whenever they want. In addition to this, Suggestion boxes are placed in several places of the company. 		
Is there evidence of free elections?	☐ Yes ☑ No		

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ZAA600065990

Start Date:

2024-05-20

End Date: 2024-05-20

Does the supplier provide adequate facilities to allow the Union or committee	☐ Yes ☑ No
to conduct related business?	Please give details:
	There is no Union at the facility
Name of union and union representative, if applicable:	There is no Union at the facility
Is there evidence of free elections?	☐ Yes ☐ No ☑ Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	There is 1 worker representative, open door policy and suggestion boxes in the facility.
Is there evidence of free elections?	☑ Yes □ No □ Not Applicable
Are all workers aware of who their representatives are?	☑ Yes □ No
representatives are.	Please give details:
	All workers know who their representatives are.
Were worker representatives freely elected?	☑ Yes □ No
Date of last election:	2024-05-17
Do workers know what topics can be raised with their representatives?	☑ Yes □ No
Were worker representatives/union representatives interviewed?	☑ Yes □ No
If Yes, please state how many:	1.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	There is 1 worker representative in the facility instead of a worker committee or trade union. In addition, there is no worker committee and trade union obligation as per the legislation. Employees declared that they can go to the worker representatives for their suggestions for all issues. All workers know who their representatives are.
Are any workers covered by Collective Bargaining Agreement (CBA)?	☐ Yes ☑ No

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

Compliance Requirements

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

3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be

repeated for new or reassigned workers.

3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

Current Systems and Evidence Examined

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

Current Systems:

1. General Health and Safety management

Potable water was freely available in all areas and test certificates were up to date.

- Health certificates for kitchen operators and the hygiene certificate for the kitchen was up to date and
- Emergency case plans were provided inside the facility.
- Emergency evacuation plans were provided in the facility. There were 2 first aiders.

- The hazardous class of the facility is low hazardous.
- Injury records are kept by facility.
- There were adequate first aid kits in each production area and they were well stocked.

Fire Safety

- The building has enough exit door from each of work area and these were clearly marked.

- There were 2 emergency exits in the facility.

- Firefighting equipment was adequate and checks were up to date.
 The fire drill conduct on 18.8.2023. Previous fire drill records couldn't be provided.
- Training had been given by fire marshals had been specially selected for extra training.
- Fire alarm is provided and active.

Electrical safety

- All electrical equipment were maintained in good condition such as sockets, plugs, switches and main fuse boards.

Evidence examined:

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 Management & Employee interviews

Any other comments:

NONE

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Does the facility have general and occupational Health & Safety policies and	☑ Yes □ No
procedures that are fit for purpose and	Please give details:
are these communicated to workers?	The facility has Health & Safety Procedures and these procedures are shared with employees via trainings.
Are the policies included in workers' manuals?	□ Yes ☑ No
	Please give details:
	The facility has a detailed Health & Safety procedure and this procedure is explained in Health and Safety trainings to employees.
Are there any structural additions without required permits/inspections	☐ Yes ☑ No
(e.g. floors added)?	Please give details:
	Please refer to findings.
Are visitors to the site informed on H&S and provided with personal protective	☑ Yes □ No
equipment?	Please give details:
	This information is provided by H&S specialist.
Is a medical room or medical facility provided for workers?(This section is to	☐ Yes ☑ No
list evidence to support system	Please give details:
description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))	There is no legal requirements.
Is there a doctor or nurse on site or there	☑ Yes □ No
is easy access to first aider/ trained medical aid?	Please give details:
	There are 2 first aiders in the facility. Also, the first aid boxes are placed at every production area.
Where the facility provides worker	☑ Yes □ No
transport – is it fit for purpose, safe, maintained and operated by competent	Please give details:
persons e.g. buses and other vehicles?	Documents stating compliance are provided.
Is secure personal storage space	☐ Yes ☑ No
provided for workers in their living space and is fit for purpose?	Please give details:
	Accommodation is not provided by the facility.
Are H&S Risk assessments are conducted (including evaluating the arrangements	☑ Yes □ No
for workers doing overtime e.g. driving	Please give details:
after a long shift) and are there controls to reduce identified risk?	The risk assessment has working hour's section.
Is the site meeting its legal obligations on environmental requirements	☑ Yes □ No
including required permits for use and disposal of natural resources?	Please give details:
disposal of natural resources?	There is the letter of out of scope of environmental permit.

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☑ Yes □ No

Please give details:

Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals? No banned chemical is used by the facility.

	Non-Co	mpliance			Evidence
[Back to findings summary]					
	Non-Coi	mpliance		1	
Status	OPEN				
Reference	ZAF600473929				
Clause	3 - Working Cond	itions are Safe a	and Hygienic		
Issue Title	172 - Fire licence, place as required	inspection, or o	certificates not in		
Subcategory	Fire Safety - Licen	ses, Inspection	s & Training		
New or carried over?	□ New	☑ Ca	arried Over		
Raised by audit	ZAA600022207				
Root cause	☐ Training	☑ Sy	/stem		
	□ Costs	□ La	ack of workers		
	□ Other				
Root cause - Other					
Local law issue	(10/8/2005) - II. cl given a business meet the followin recreation and er where explosive, substances are p of workplaces wit main entrance ga	hapter The com opening and op og conditions: A itertainment pla flammable and roduced, sold a ch more than the test connection usiness office, be te the necessary nat the fire is ta	verating permit must rticle 5 h) Public aces; workplaces combustible nd stored; All kinds irty employees, the street and the of more than one azaar and similar y fire prevention ken, in other		
ETI code	be provided, bear knowledge of the hazards. Adequat accidents and injuted associated with, of by minimising, so the causes of haz environment.	ring in mind the e industry and o te steps shall be ury to health ari or occurring in t o far as is reasor ards inherent ir	f any specific taken to prevent ising out of, the course of work, nably practicable, n the working		
Explanation to the non compliance	There is no fire b	rigades report o raporu mevcut	of the facility. /// değildir.		
Follow up method	☐ Follow up aud	it ☑ Do	esktop audit		
Timescale	□ Immediate	□ 30 days	□ 60 days		
	□ 90 days	☑ 120 days	□ 180 days		

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	□ 365 days □ Other		
Actions	Please provide compliant report from fire deaprtment. /// Lütfen itfaiye müdürlüğünden uygun rapor sağlayınız.		
	·		

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	Non-Cor	mpliance			Evidence
[Back to findings summary]					
	Non-Cor	mpliance			
Status	CLOSED			7	
Reference	ZAF600473930			7	
Clause	3 - Working Cond	itions are Safe a	and Hygienic		
Issue Title	308 - Insufficient following air qual temperature asse	ity / dust level /	improve conditions noise / necessary		
Subcategory	Worker Health				
New or carried over?	□ New	☑ Ca	arried Over		
Raised by audit	ZAA600022207				
Resolved by audit	ZAA600065990				
Root cause	☐ Training	☑ Sy	rstem		
	□ Costs	□ Lā	ick of workers		
	□ Other				
Root cause - Other					
Local law issue	which conduct me Labour Hygiene, – (1) Employer she the dangers and conditions and are substance. To proshall conduct me evaluations on phesical conduct medical easurement, test Date: 20.08.201 all protect the element in particular processed, use processed, use poide a safety wasurement, test processed, chemical, chemical, chemical, crisonnel exposu	3, No: 28741; Art. 5 mployee against acts of workplace sed or existed orkplace; employer analyse and			
ETI code	be provided, bear knowledge of the hazards. Adequat accidents and inju	ring in mind the industry and o se steps shall be ury to health ari or occurring in t ofar as is reasor	f any specific taken to prevent sing out of, he course of work, nably practicable,		
Explanation to the non compliance	There is no indus the facility. //// İş mevcut değildir.	trial indoor mea letmenin iç orta	asurement report of am ölçüm raporları		
Follow up method	☐ Follow up aud	it 🗵 Do	esktop audit		
Timescale	□ Immediate	□ 30 days	□ 60 days		
	□ 90 days	☑ 120 days	□ 180 days		

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Start Date: End Date:

	□ 365 days □ Other
Actions	Please provide compliant reports of parametres designated by the HS expert from authorized laboratories. //// Lütfen yetkili laboratuvardan ISG uzmanının belirlerdiği parametreler için uygun raporları sağlayınız.
Additional comments	According to document review, indoor measurement report is conducted on 18.5.2024.//Doküman incelemesine göre 18.5.2024 tarihinde iç ortam ölçüm raporu yapılmıştır. According to document review, indoor measurement report is conducted on 18.5.2024.//Doküman incelemesine göre 18.5.2024 tarihinde iç ortam ölçüm raporu yapılmıştır.

	Non-Compliance	Evidence	
[Back to findings summary]			
	Non-Compliance		
Status	CLOSED		
Reference	ZAF600473932		
Clause	3 - Working Conditions are Safe and Hygienic		
Issue Title	162 - No / inadequate health and safety training provided to workers in relation to processes which may cause serious injury or death - isolated		
Subcategory	Health & Safety Training		
New or carried over?	☐ New ☐ Carried Over		
Raised by audit	ZAA600022207		
Resolved by audit	ZAA600065990		
Root cause	☐ Training ☐ System		
	☐ Costs ☐ Lack of workers		
	□ Other		
Root cause - Other			
Local law issue	In accordance with Turkish Regulation about Occupational Health and Safety circumstances using work equipments (25/04/2013) No: 28628, Appendix 2 2.1. Self moved equipments should be used by the employees who takes the proper training.		
ETI code	3.2 - Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.		
Explanation to the non compliance	There is no employee with forklift driving license whereas there is 1 forklift at the facility. //// İşletmenin 1adet forklifti mevcuttur ancak forklift operatör belgeli çalışan mevcut değildir.		
Follow up method	☐ Follow up audit ☑ Desktop audit		
Timescale	☐ Immediate ☐ 30 days ☐ 60 days		
	□ 90 days		
	□ 365 days □ Other		
Actions	Please provide an employee with forklift operating lisence. /// Lütfen forklift ehliyetli çalışan sağlayınız.		
Additional comments	During the facility tour, it was observed that there is one forklift in the facility. In addition, there is employee with forklift driving license.//Tesis gezisi sırasında tesiste 1 adet forkliftin bulunduğu gözlemlendi. Ayrıca forklift ehliyetine sahip personel bulunmaktadır. During the facility tour, it was observed that there is		

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End Date:

one forklift in the facility. In addition, there is employee with forklift driving license.//Tesis gezisi sırasında tesiste 1 adet forkliftin bulunduğu gözlemlendi. Ayrıca forklift ehliyetine sahip personel bulunmaktadır.

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Start Date: En 2024-05-20 20

End Date: 2024-05-20

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

4: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:
There is an informal procedure for checking ages of employees at application stage, and this includes checking ID's. Once employees have joined, their original ID's are copied and given back to them whilst copies only are kept in their personnel file. Checks of all employees' files showed that the youngest worker' age is 19 years old.
Evidence examined:
ID Copies of employees Personnel file Child labour policy Management and employee interviews Facility tour Personnel list
Any other comments:
NONE

Legal age of employment:	15
Age of youngest worker found:	19
Are there children present on the work floor but not working at the time of audit?	☐ Yes ☑ No
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	☐ Yes ☑ No
	Please give details:
	There is no young employee who under 18 age is in the facility.

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ZAA600065990

Start Date: 2024-05-20

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5 - Living Wages are Paid [Summary of Findings]

5: Compliance Requirements

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
5.2 All workers shall be provided with written and understandable information about their employment

conditions in respect to wages before they enter employment and about the particulars of their wages for

the pay period concerned each time that they are paid.

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

Current Systems and Evidence Examined

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

Current Systems:

Payment Day: On 5th of each month.

Payments of the employees are done via bank accounts.

Employees are given a detailed payslip every month.

Annual leaves are used by the employees properly.

There was no employee under the legal minimum wage.

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

Legal min wage:

Since January 1st 2023: 10.008 TL (Gross); 8.506,80 TL (Net) / month. Since July 1st 2023: 13.414,50 TL (Gross); 11.402,32 TL (Net) / month.

Since January 1st, 2024: 20.002,50 TL(Gross); 17.002,12 TL (Net) / month

Evidence examined:

10 employees' attendance records and payroll records of April 2024 (last paid month), October 2023 (peak month) and February 2024 (non peak month) were reviewed.

Payment records

Time records

Social insurance records

Employee & management interviews

Leave records

Any other comments:

In the facility, all employees are new employees who hired on May 2024 have, therefore 12 monthly records were not reviewed.

Summary Information			
Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 11.0 Per Week: 45.0 Per Month: null	Actual Per Day: 9.0 Per Week: 45.0 Per Month: 225.0	NO
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 11.0 Per Week: null Per Month: null	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 0.0	NO

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Start Date:

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Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: 17002.12	Actual Per Day: 0 Per Week: 0 Per Month: 17002.12	NO NO
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: null	Per Day: 0 Per Week: 0 Per Month: 0	NO
	Wages Analysis:		
Were accurate records shown at the first request?	☐ Yes ☑ No In the facility, all emp May 2024 have, there reviewed. Please refe	ployees are new empl efore 12 monthly reco er to findings.	oyees who hired on ords were not
If No, why not?	No		
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	10 employees' attendance records and payroll records of April 2024 (last paid month), October 2023 (peak month) and February 2024 (non peak month) were reviewed.		
Are there different legal minimum wage grades? If Yes, please specify all.	☐ Yes ☑ No		
If there are different legal minimum	☐ Yes ☐ No ☑ Not Applicable		
grades, are all workers graded and paid correctly?	Please give details:		
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	□ Below legal min☑ Above	☑ Meet	
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	17002.12		
Please indicate the breakdown of workforce per earnings	90.0% of workforce e	rning under minimur earning minimum wag earning above minimu	ge J
Bonus Scheme found: Please specify details:	Bonus Scheme found:NA Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.		
What deductions are required by law e.g. social insurance? Please state all types:	Social insurance and	taxes.	
Have these deductions been made?	☑ Yes □ No		
Please list all deductions that have been made.	Social insurance and taxes.		
Please list all deductions that have not been made.	Meal and transportation		
Were appropriate records available to verify hours of work and wages?	□ Yes ☑ No		
Were any inconsistencies found? (if yes describe nature)	☑ Yes □ No		

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Report reference: ZAA600065990

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Nature of inconsistencies:	☐ Poor record ☐ Isolated incident ☐ Repeated keeping occurrence
Specific details:	In the facility, all employees are new employees who hired on May 2024 have, therefore 12 monthly records were not reviewed. Please refer to findings.
Do records reflect all time worked? (For instance, are workers asked to attend	☐ Yes ☑ No
meetings before or after work but not paid for their time)	Please give details:
para for their time;	In the facility, all employees are new employees who hired on May 2024 have, therefore 12 monthly records were not reviewed. Please refer to findings.
Is there a defined living wage: This is not normally minimum legal	☐ Yes ☑ No
wage. If answered yes, please state amount and source of info:	Please give details:
Please see SMETA Best Practice Guidance and Measurement Criteria.	
If yes, what was the calculation method used.	□ ISEAL/Anker Benchmarks □ Asia Floor Wage
useu.	☐ Figures provided by ☐ Living Wage Foundation UK
	☐ Fair Wear Wage Ladder ☐ Fairtrade Foundation
	□ Other – please give details:
Are there periodic reviews of wages? If Yes give details (include whether there is	□ Yes ☑ No
consideration to basic needs of workers plus discretionary income).	Please give details:
Are workers paid in a timely manner in line with local law?	☑ Yes □ No
Is there evidence that equal rates are being paid for equal work:	☑ Yes □ No
being paid for equal work.	Please give details:
	It was confirmed through employee and management interviews and labour contracts, pay slips; equal rates are paid for equal work.
How are workers paid:	□ Cash □ Cheque
	☑ Bank Transfer ☐ Other

Audit company: Intertek Turkey Report reference: ZAA600065990

Start Date: 2024-05-20



	Non-Compliance	Evidence
[Back to findings	summary]	
	Non-Compliance	
Status	CLOSED	
Reference	ZAF600473933	
Clause	5 - Living Wages are Paid	
Issue Title	415 - Workers are charged (including via wage deductions) for Personal Protective Equipment (PPE) or other essential work-related items	
Subcategory	Deductions	
New or carried over?	☐ New ☐ Carried Over	
Raised by audit	ZAA600022207	
Resolved by audit	ZAA600065990	
Root cause	☐ Training ☐ System	
	☐ Costs ☐ Lack of workers	
	□ Other	
Root cause - Other		
Local law issue	ILO General principles and operational guidelines for fair recruitment and Definition of recruitment fees and related costs: For the purpose of this definition of recruitment fees and related costs, the definitions of the General Principles and Operational Guidelines apply. The term "workers" includes jobseekers. OCCUPATIONAL HEALTH AND SAFETY LAW#6331(20/6/2012) ARTICLE 15 – (1) The employer does the following: a) Ensures that the employees are subjected to health surveillance, by taking into account the health and safety risks that they would encounter at the workplace; b) In the following cases, they must ascertain that the employees' medical checkups are done: 1) When they start the job; 2) When they change their job; 3) When after repeated leaves because of an industrial accident, occupational disease or health issued, they request to return to the job; 4) Throughout the employment, at regular interval as decided by the Ministry according to the qualifications of the employee, the nature of the work and the danger class of the workplace. (2) Those who will work at hazardous and very hazardous class workplaces will not be allowed to start work until they get a health report verifying that are medically fit for the job. (3) Medical reports that must be obtained as a requirement under this Law must be obtained at the workplace health and safety unit or from the workplace doctor that works at the joint health and safety unit from which service is procured. Objections to the reports must be submitted to the arbitrator hospitals that are	

	selected by the Ministry of Health, and their decisions will be final. (4) All costs of the health surveillance and all additional cost that is incurred because of such surveillance will be borne by the employer, and the employee will not be charged for them. (5) Medical details of the employee who has been examined will be kept confidential respecting	
ETI code	the right of privacy. 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.	
Explanation to the non compliance	2 out of 5 sampled employees are noted to pay for the health reports provided in hiring. /// Örneklenen 5 çalışandan 2'sinin işe giriş sağlık raporuna ücret ödediği tespit edilmiştir.	
Follow up method	☑ Follow up audit ☐ Desktop audit	
Timescale	□ Immediate □ 30 days □ 60 days □ 90 days □ 120 days □ 180 days □ 365 days □ Other	
Actions	Please ensure all costs arising in hiring is paid by the employer. /// Lütfen işe alım sırasında ortaya çıkan tüm maliyetin işveren tarafından ödendiğinden emin olunuz.	
Additional comments	25 kişinin sağlık raporunun ödendiğine dair fatura ektedir. According to document review, employee and management interview, it was observed that the cost of all employees' health reports in hiring were paid by employer.//Doküman incelemesi, çalışan ve yönetim görüşmesi sonucunda, işe alımda çalışanların tüm sağlık raporlarının maliyetinin işveren tarafından ödendiği görüldü.	

2024-05-20

	Non-Compliance	Evidence
[Back to findings	summary]	
	Non-Compliance	
Status	OPEN	
Reference	ZAF600473934	
Clause	5 - Living Wages are Paid	
Issue Title	406 - Unable to verify wages due to missing/ incomplete/ inconsistent records	
Subcategory	Record keeping and documentation	
New or carried over?	☐ New ☑ Carried Over	
Raised by audit	ZAA600022207	
Root cause	☐ Training ☑ System	
	☐ Costs ☐ Lack of workers	
	□ Other	
Root cause - Other		
Local law issue	In accordance with The Turkish Regulation on Overtime and Extra Work art 10 Employer is obligated to arrange a document that indicates the extra working and overtime hours and keep a signed copy of this document in employees' personnel files. The overtime and extra works payments included with normal working hours payment that are given to employees are paid according to Turkish Labor Law #4857/Article 32-34, This payment has to be clearly shown on payroll documentation and on pay slips, which are given to employees according to Turkish Labor Law #4857/Article 37.	NC- INCONSISTENCY.1pdf.
ETI code	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.	
Explanation to the non compliance	There is inconsistency between time records, process control records & shipment records. There are rest day working practices in August 2022 & September 2022 (2 & 4 rest days respectively) however the manual time records has no rest day work. Employees state electronic card & finger printing is used, however manual records are provided. There is time record on national holiday 30.08.2022 however there is no payment in official pay rolls provided. So the working hours & related payments cannot be verified through consistent records. /// Proses kontrol raporlari, sevkiyat kayıtları ve zaman kayıtları arasında tutarsızlık mevcuttur. Proses kontrol ve sevkiyat kayıtları Ağustos 2022 ve Eylül 2022'de hafta tatili çalışmaları gösterirken (2 ve 4 hafta tatilinde), zaman	

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ummary] Good Example	
Good Evample	
Good Example	1
OPEN	1
ZAF600492110	
5 - Living Wages are Paid	1
429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	
Benefits & Insurance	1
☑ New ☐ Carried Over	
Meal and transportation is provided free of charge to all employees.// Ulaşım ve yemek çalışanlara ücretsiz olarak sağlanmaktadır.	
Employee interview & document review//Çalışan görüşmeleri & doküman incelemesi	1
	ZAF600492110 5 - Living Wages are Paid 429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport Benefits & Insurance New

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

Version 6.1

6: Compliance Requirements

- 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub–clauses 6.2 to 6.6 are based on international labour standards.
- 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week
- 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

Working hours of the facility for all workers was as follows:

For management and production employees

09:00 - 18:00 (including 60 minutes lunch break + 2x15 minutes tea break x 6 days in a week)

Through employees' interview, overtime is voluntary.

Payment Day: On 5th of each month.

Payments of the employees are done via bank accounts.

Timecard time recording system are available.

10 employees' attendance records and payroll records of April 2024 (last paid month), October 2023 (peak month) and February 2024 (non peak month) were reviewed.

Evidence examined:

Payment records

Time records

Social insurance records

Leave records

Attendance records of employees were reviewed.

Interviews were conducted with employee and management.

Any other comments:

In the facility, all employees are new employees who hired on May 2024 have, therefore 12 monthly records were not reviewed.

Working hours' analysis	
Systems & Processes	
What timekeeping systems are used?	Timecard time recording system are available.
Is sample size same as in wages section?	☑ Yes □ No
	Please give details:

Audit company: Report reference: Start Date: End Date: ZAA600065990 2024-05-20 2024-05-20 **Intertek Turkey**



Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.) Are there any other types of contracts/employment agreements used? Do any standard/contracted working hours defined in contracts/employment agreements wised? Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, % types of workers affected and frequency.) Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period? Please give details In the facility, all employees are new employees who hired on May 2024 have, therefore 12 monthly records were not reviewed. Therefore, wage and time records were not verified through the records. Please refer to findings. Is this allowed by local law? Yes No Maximum number of days worked without a day off (in sample): Standard/Contracted Hours worked Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency) Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.) Overtime Hours worked Actual overtime hours worked in sample (State per day/week/month) Combined hours (standard or contracted + overtime hours = total) over 60 found? Approximate percentage of total workers on highest overtime hours: Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker iteratives / refusal arrangements) Overtime remails members are new employees who hired on kay 2024 have, therefore 12 monthly records were not reviewed. Please refer to findings. Please give details: In the facility, all employees are new employees who hired on May 2024 have, therefore 12 monthly records were not reviewed. Please refer to findings.					
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Actual overtime hours worked in sample (State per day/week/month) In the facility, all employees are new employees who hired on May 2024 have, therefore 12 monthly records were not reviewed. Please refer to findings. Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details: In the facility, all employees are new employees who hired on May 2024 have, therefore 12 monthly records were not reviewed. Please refer to findings. Approximate percentage of total workers on highest overtime hours: Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements) Yes No Conflicting Information Please give details: Employee interviews	permissions which allow averaging/annualised hours for this site?	☐ Yes ☑ No			
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evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements) Please give details: Employee interviews		0.0%			
employment agreement / handbook / worker interviews / refusal arrangements) Please give details: Employee interviews		☑ Yes ☐ No ☐ Conflicting Information			
worker interviews / refusal arrangements) Employee interviews	employment agreement / handbook /	Please give details:			
O TOTALINO PROFINIALIT	, ,	Overtime premium			

Audit company: Intertek Turkey Report reference: Start Date: End Date:

Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard	☐ Yes ☑ No ☐ N/A – there is no legal requirement to OT premium
wages)	Please give details:
	In the facility, all employees are new employees who hired on May 2024 have, therefore 12 monthly records were not reviewed. Please refer to findings.
Is overtime paid at a premium?	□ Yes ☑ No
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.	☐ No ☐ Consolidated ☐ Collective Bargaining agreements ☐ Other
Please give details	In the facility, all employees are new employees who hired on May 2024 have, therefore 12 monthly records were not reviewed. Please refer to findings.
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain	☐ Overtime is voluntary ☐ Onsite Collective ☐ Safeguards are bargaining allows in place to protect worker's health and safety
any checked boxes above e.g. detail of consolidated pay / CBA or Other)	☐ Site can ☐ Other reasons demonstrate (please specify) exceptional circumstances
Please give details	There is no practice over 60 hours – "other reason" is selected to due to technical reasons in system.
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	None
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	□ Yes ☑ No
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	☑ Yes □ No

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	Non-Compliance	Evidence
[Back to findings	summary]	
	Non-Compliance	
Status	OPEN	
Reference	ZAF600473935	
Clause	6 - Working Hours are not Excessive	
Issue Title	463 - Unable to verify working hours due to missing/incomplete/ inconsistent records	
Subcategory	Hours - Record keeping and management systems	
New or carried over?	☐ New ☐ Carried Over	
Raised by audit	ZAA600022207	
Root cause	☐ Training ☑ System	
	☐ Costs ☐ Lack of workers	
	□ Other	
Root cause - Other		
Local law issue	In accordance with The Turkish Regulation on Overtime and Extra Work art 10 Employer is obligated to arrange a document that indicates the extra working and overtime hours and keep a signed copy of this document in employees' personnel files. The overtime and extra works payments included with normal working hours payment that are given to employees are paid according to Turkish Labor Law #4857/Article 32-34, This payment has to be clearly shown on payroll documentation and on pay slips, which are given to employees according to Turkish Labor Law #4857/Article 37.	NC- INCONSISTENCY.1pdf.
ETI code	6.1 - Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.	
Explanation to the non compliance	There is inconsistency between time records, process control records & shipment records. There are rest day working practices in August 2022 & September 2022 (2 & 4 rest days respectively) however the manual time records has no rest day work. Employees state electronic card & finger printing is used, however manual records are provided. There is time record on national holiday 30.08.2022 however there is no payment in official pay rolls provided. So the working hours & related payments cannot be verified through consistent records. /// Proses kontrol raporları, sevkiyat kayıtları ve zaman kayıtları arasında tutarsızlık mevcuttur. Proses kontrol ve sevkiyat kayıtları Ağustos 2022 ve Eylül 2022'de hafta tatili çalışmaları gösterirken (2 ve 4 hafta tatilinde), zaman kayıtlarında hafta tatili çalışmaları görülmemektedir.	

Audit company: Intertek Turkey Report reference: ZAA600065990

Start Date:

2024-05-20

7 - No Discrimination is Practiced [Summary of Findings]

7: Compliance Requirements

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

Current Systems and Evidence Examined To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems. **Current Systems:** No evidence against discrimination requirements of the client was found during the audit processes. Employees stated that they were paid and treated equally. There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases. **Evidence examined:** Personnel files Pay slips Disciplinary policy Company social compliance policy Employee interview Any other comments:

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 70.09	%	Female: 30.0%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	0		
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?	☐ Hiring	☐ Compensation	☐ Access to training
	☐ Promotion	☐ Termination or retirement	No evidence of discrimination found
Please give details	NA		
Professional Development			
What type of training and development are available for workers?	Discrimination policy and procedure training are given to employees. Also, discipline rules are explained.		
Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	☑ Yes □ No		

Audit company: Intertek Turkey

NONE

Report reference: Start

ZAA600065990

Start Date: End Date:

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8 - Regular Employment Is Provided [Summary of Findings]

Version 6.1

8: Compliance Requirements

8.1 To every extent possible work performed must be on the basis of recognised employment relationship

established through national law and practice.

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

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

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

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

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

Current Systems and Evidence Examine

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	S١	/ste	m	S	:
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Employees' labour contracts were available in their personnel files. Labour contracts were in accordance with the laws and regulations. A copy of employment contract was given to employees.

Evidence examined:

The hiring and termination practices Personal files Payroll records were provided for review. Management was interviewed

Δnv	other	com	ments:
Ally	Othici	COIII	memo.

NONE

Responsible Recruitment				
All Workers	All Workers			
Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	 ☑ Terms & Conditions ☑ Understood by workers presented ☑ Same as actual conditions 			
Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)	□ Yes ☑ No			
Migrant Workers				
Type of work undertaken by migrant workers:	There is no migrant employee in the facility.			

Audit company: Report reference: Start Date: End Date: ZAA600065990 2024-05-20 2024-05-20

Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0	
Are migrant workers' voluntary deductions (such as for remittances)	☐ Yes ☑ No	
confirmed in writing by the worker and is	Please give details:	
evidence of the transaction supplied by the facility to the worker?	There is no migrant employee in the facility.	
Is there any observation on this finding?	There is no migrant employee in the facility.	
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	□ Yes ☑ No	
	Non-employee workers	
Recruitment Fees		
Are there any fees?	□ Yes ☑ No	
Agency Workers (if applicable) (Workers sou by the agency. Usually the agencies are paid	rced from a local agent who are not directly paid by the site, but paid d by the site and the wages of the individual workers are paid by the agency.)	
Number of agencies used (average):	0	
Please provide the names of agencies if applicable	NA	
Were agency workers' age / pay / hours included within the scope of this audit?	□ Yes ☑ No	
Were sufficient documents for agency workers available for review?	□ Yes ☑ No	
Is there a legal contract agreement with all agencies?	☐ Yes ☑ No	
all agencies:	Please give details:	
	There is no agency worker at the facility.	
Does the site have a system for checking labour standards of agencies?	☐ Yes ☑ No	
labour standards or agenties.	Please give details:	
	There is no agency worker at the facility.	
Contractors (Contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider.)		
Any contractors on site?	☐ Yes ☑ No	
	Please give details:	
	There is no contractors worker at the facility.	
Do all contractor workers understand	☐ Yes ☑ No	
their terms of employment?	Please give details:	
	There is no contractors worker at the facility.	

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

8A: Compliance Requirements 8.A.1 There should be no sub-contracting unless previously agreed with the main client. 8.A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.

Current Systems and Evidence Examined			
To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.			
Current Systems:			
There is no subcontracting or homeworking.			
Evidence examined:			
Employees from every unit were selected and interviewed. Production site and machinery Capacity Report			
Any other comments:			
NONE			
Summary of sub–contracting – if applicable			
Is there any sub-contracting at this site? ☐ Yes ☑ No			
Summary of homeworking – if applicable			
Is homeworking used at this site?			

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

9: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

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

Disciplinary regulation was complaint with the legal regulations.

No disciplinary action was taken.

Evidence examined:

Disciplinary regulation of the facility and the personnel files of the sampled employees were reviewed. Suggestion boxes check book was checked. Employee interview was conducted.

The relevant policy on prevention of harassment and abuse.

Internal grievance procedure documentation.

Training records.

Any other comments:		
	NONE	
	And the use multiple and are an improve and day	

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?	 ✓ Yes □ No Please give details: There are published, anonymous and/or open channels available for reporting any violations of Labour standards. The employees can report to the legal authorities. There are suggestion box, and an internal confidential email address for reporting grievances. 	
If yes, are workers aware of these channels and have access? Please give details.	Workers are aware of these channels. There are published, anonymous and/or open channels available for reporting any violations of Labour standards.	
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism,comment box etc. Please give details.	Suggestion box, worker representative, open door policy.	
Which of the following groups is there a	☑ Worker	
grievance mechanism in place for?	☑ Suppliers	□ Other
Please provide grievance mechanism details	Suggestion box, worker representatives, open door policy	
Are there any open disputes?	☐ Yes ☑ No	
	Please give details:	

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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)	✓ Yes □ No Please give details:
Is there a published and transparent disciplinary procedure?	✓ Yes □ No Please give details:
If yes, are workers aware of these the disciplinary procedure?	☑ Yes □ No Please give details:
Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	☐ Yes ☑ No Please give details:

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

10A: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

There is no migrant employee in the facility.

Evidence examined:

ID copies and social security registrations of the employees were reviewed

Any other comments:

NONE

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10B2 - Environment 2-Pillar [Summary of Findings]

10B2: Compliance Requirements

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

10.B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.

Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.

Current Systems and Evidence Examined

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

Current Systems:

There is a written environmental policy of the facility. The facility complies with environmental requirements.

The facility is aware of clients' and environmental requirements.

Evidence examined:

Facility tour Management interview Environmental policy and documents Waste disposal records

Any other comments:

NONE

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End Date:



Attachments



TIME RECORDING SYSTEM.JPG



PRAYER ROOM.JPG



TOILET.JPG



POTABLE WATER.JPG



SUGGESSTION BOX.JPG



WASTE AREA.JPG

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FIRE HOSE.JPG



FIRE ALARM BUTTON.JPG



OVERVIEW OF THE FACILITY.JPG



FIRE EXTINGUISHER 2.JPG



FIRST AID BOX.JPG



FIRE EXTINGUISHER.JPG

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ETI BASE CODE.JPG



EMERGENCY EXIT DOOR.JPG



EMPLOYEE NOTICE BOARD.JPG



ASSEMBLY AREA.JPG



CHANGING ROOM.JPG



AISLES.JPG

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ELECTRICAL PANEL.JPG



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