




Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 413624556	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 413694727
Business name (Company name):	OKYANUS MUTFAK ESYALARI SAN. VE DIS. TIC. LTD. STI.		
Site name:	OKYANUS MUTFAK ESYALARI SAN. VE DIS. TIC. LTD. STI. 2 nd Branch		
Site address: <i>(Please include full address)</i>	Ikitelli OSBM ah. Eski Turgut Ozal Cad. No: 4 B Blok No: 105-105/A Basaksehir / Istanbul	Country:	TURKEY
Site contact and job title:	NECLA BUYUK – QUALITY MANAGEMENT SYSTEM REPRESENTATIVE		
Site phone:	0090 2125497795	Site e-mail:	kys@okyanushome.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar <input checked="" type="checkbox"/> Business Ethics
Date of Audit:	22.02.2021		

<p>Audit Company Name & Logo:</p> 	<p>Report Owner (payer): <i>(If paid for by the customer of the site please remove for Sedex upload)</i></p> <p>OKYANUS MUTFAK ESYALARI SAN. VE DIS. TIC. LTD. STI.</p>
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

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

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

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

Any exceptions to this must be recorded here (e.g. different sample size): Due to the Covid19 measures of SEDEX, only 6 individual interviews were conducted. The facility submitted the employee number as under 100 during the audit planning phase. Therefore, the audit was conducted as 1,5 man-days.

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

Lead auditor: ORHAN BUYUKCAM- LEAD AUDITOR APSCA number: RA21700567

Lead auditor APSCA status: RA

Team auditor: BERK COSAR (ASCA) APSCA number: ASCA21705069

Interviewers: BERK COSAR, APSCA number: ASCA21705069,

ORHAN BUYUKCAM APSCA number: RA21700567

Report writer: ORHAN BUYUKCAM, AUDITOR

Report reviewer: NESE SEVILIR (Report Reviewer) AUDITOR RA 21701450

Date of declaration: 22.02.2021

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

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

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>		0	0	NONE OBSERVED
0B Management systems and code implementation		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	NONE OBSERVED
1. Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	NONE OBSERVED
2. Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	NONE OBSERVED
3. Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	4	0	0	NC's: <ol style="list-style-type: none"> 1. It was noted that there was no automatic fire extinguishing system for the hood fan in the kitchen of the lunch hall. 2. There are no secondary containers for the solvent barrels in the production area. 3. The warehouse-packaging section of the facility and the general production area fire alarm system are not integrated. The alarm activated in production is not audible in the other area.

									4. There is no comprehensive watery-firefighting system periodical inspection report in the facility. The control report dated 26.08.2020 does not meet this requirement.
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	NONE OBSERVED
5	<u>Living Wages and Benefits</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	1	0	1	<p>NC:</p> <p>5. There are 23 "daily" employees working in the packaging and montage sections of the facility. These employees work 9 (net) hours a day like other facility production employees. As a result of the work and payment records reviewed, it was noted that the relevant employees were not paid 1 full-day weekly holiday progress payment after working 45 hours a week, and no overtime payment was made after they worked 45 hours a week.</p> <p>GE:</p> <p>1. Meal and transportation are provided free of charge to all employees.</p>
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	NONE OBSERVED
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	NONE OBSERVED
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	NONE OBSERVED
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	NONE OBSERVED
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	NONE OBSERVED

10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	NONE OBSERVED
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	N/A
10B4	<u>Environment 4-Pillar</u>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1	0	0	NC: 6. It was noted that there was no environment permit or environment out of scope letter in the facility.
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	NONE OBSERVED

General observations and summary of the site:

OKYANUS MUTFAK ESYALARI SAN. VE DIS. TIC. LTD. STI. was established in 2002. The facility has been in its current building since January 2020. The building structure is concrete. Total facility closed area is 6000 m².
 The products manufactured at the facility is metal kitchen & bathroom and home equipment
 Regular working hours are:
 For Production: 08:00-18:30 with 60' lunch break 15' x 2 tea break for 5 days.
 For Packing: 08:00-18:00 with 30' lunch break 15' x 2 tea break for 5 days.

Overall responsibility for meeting the standards is taken by NECLA BUYUK – QUALITY MANAGEMENT SYSTEM REPRESENTATIVE
 Total 137 employees (26 administration/ 6 female and 20 male, 111 production / 15 female and 96 male (includes agency workers, 23 for packing section / 8 female and 15 male));
 Pregnant employees: 0
 Migrant employees: 4
 Disabled employees: 3
 There is 1 young employee who is working as helper in packing section
 The youngest employee is 17 years old in the facility.
 There are 3 worker representatives who elected by employees at the facility.
 There is no union at this facility.

6 workers were selected for interview including 2 female and 4 male employees, they were interviewed individually.
 10 employees' attendance records and payroll records of April 2020 (non peak month), October 2020 (peak month) and January 2021 (last-paid month) were reviewed.

According to the documents examined at least above the legal minimum pay was paid to all workers. 2324,70 TL/month for 2020, 2825,90 TL/Month for 2021 (Net- including subsistence allowance)

There is 2 service provider(contractor) at the facility.

Meal service is provided by Beyaz Sofra Berceste Yemek Hizmetleri (3 staff, 1 male, 2 female)

Packing service for production is provided by agency (Bilkay Dan. Ve Destek Hizm A.Ş.) (23 staff, 8 female, 15 male) .

This firms are also included into the audit process.

Main production processes of the facility are welding, assembly, bending, centering, chrome plating, solvent cleaning, powder coating, packaging

Payment Period: Monthly

Payment Day: Between 1st -5th Day of each month

Production Capacity: 102.500 kg/month

Time record system: Card scanning system

Peak seasons: June, July, August, October

Audit Process

At 09:00 am on 22.02.2021, ORHAN BUYUKCAM - LEAD AUDITOR and BERK COSAR - TEAM AUDITOR entered the facility then held an opening meeting according to the ETI Base Code; the facility management was present in the meeting. Opening and closing meeting was held with ABDULLAH KOCAK-HR MANAGER, NECLA BUYUK- QUALITY MANAGEMENT SYSTEM REPRESENTATIVE

Issues found

NC's

Safety and Hygienic Conditions

1. It was noted that there was no automatic fire extinguishing system for the hood fan in the kitchen of the lunch hall.
2. There are no secondary containers for the solvent barrels in the production area.
3. The warehouse-packaging section of the facility and the general production area fire alarm system are not integrated. The alarm activated in production is not audible in the other area.
4. There is no comprehensive watery-firefighting system periodical inspection report in the facility. The control report dated 26.08.2020 does not meet this requirement.

Living Wages and Benefits

5. There are 23 "daily" employees working in the packaging and montage sections of the facility. These employees work 9 (net) hours a day like other facility production employees. As a result of the work and payment records reviewed, it was noted that the relevant employees were not paid 1 full-day weekly holiday progress payment after working 45 hours a week, and no overtime payment was made after they worked 45 hours a week.

Environment 4–Pillar

6. It was noted that there was no environment permit or environment out of scope letter in the facility.

OBS

None observed.

GE**Living Wages and Benefits**

1. Meal and transportation are provided free of charge to all employees.

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

Site Details

Site Details																							
A: Company Name:	OKYANUS MUTFAK ESYALARI SAN. VE DIS. DIC. LTD. STI.																						
B: Site name:	OKYANUS MUTFAK ESYALARI SAN. VE DIS. DIC. LTD. STI.																						
C: GPS location: (If available)	GPS Address: 41.071191, 28.814471	Latitude: 41°04'16.3"N Longitude: 28°48'52.1"E																					
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Opening and operating permit date and no: 22.07.2020 / 2020-756 (No expiry/validity)																						
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Metal kitchen & bathroom and home equipment.																						
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<table border="1"> <thead> <tr> <th>Production Building no</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Entrance</td> <td>Another Company</td> <td>NA</td> </tr> <tr> <td>Mezzanine floor</td> <td>Showroom, offices, doctor room, meeting room</td> <td>NA</td> </tr> <tr> <td>Floor 1</td> <td>Production area, lunch hall, dressing rooms, warehouse</td> <td>NA</td> </tr> <tr> <td>Floor 2</td> <td>Another Company</td> <td>NA</td> </tr> <tr> <td>Floor 3</td> <td>Another Company</td> <td>NA</td> </tr> <tr> <td>Is this a shared building?</td> <td>Yes</td> <td>NA</td> </tr> </tbody> </table> <p>OKYANUS MUTFAK ESYALARI SAN. VE DIS. TIC. LTD. STI. was established on 2002. The facility has been in its current building since January 2020. The products manufactured at the facility is metal kitchen & bathroom and home equipment Total facility area is 6000 sqm. Monthly capacity is abt.102500 kg/month.</p>		Production Building no	Description	Remark, if any	Entrance	Another Company	NA	Mezzanine floor	Showroom, offices, doctor room, meeting room	NA	Floor 1	Production area, lunch hall, dressing rooms, warehouse	NA	Floor 2	Another Company	NA	Floor 3	Another Company	NA	Is this a shared building?	Yes	NA
Production Building no	Description	Remark, if any																					
Entrance	Another Company	NA																					
Mezzanine floor	Showroom, offices, doctor room, meeting room	NA																					
Floor 1	Production area, lunch hall, dressing rooms, warehouse	NA																					
Floor 2	Another Company	NA																					
Floor 3	Another Company	NA																					
Is this a shared building?	Yes	NA																					

	<p>The building structure is concrete.</p> <p>For below, please add any extra rows if appropriate.</p> <p>F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: N/A</p> <p>F3: Does the site have a structural engineer evaluation? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>F4: Please give details: The facility has building usage permit.</p>
<p>G: Site function:</p>	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor
<p>H: Month(s) of peak season: (if applicable)</p>	<p>June, July, August, October</p>
<p>I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)</p>	<p>The products manufactured at the facility is metal kitchen & bathroom and home equipment.</p> <p>Main production processes of the facility are welding, assembly, bending, centering, chrome plating, solvent cleaning, powder coating, packaging.</p> <p>39 point welding machines, 3 CNC wire bending machines, 3 eccentric presses, 1 moulder milling machine, 1 column drill bench, 2 belt sanding machine, 2 arm scissors, 1 sandblasting machine, 1 compressor, 1 flat bending machine, 1 electrostatic paint plant , 2 pallet trucks, 1 hydraulic lift.</p>
<p>J: What form of worker representation / union is there on site?</p>	<input type="checkbox"/> Union (name) <input type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (Open door policy, worker representatives, suggestion boxes) <input type="checkbox"/> None
<p>K: Is there any night production work at the site?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>L: Are there any on site provided worker accommodation buildings e.g. dormitories</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>L1: If yes, approx. % of workers in on site accommodation</p>

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

Audit Parameters			
A: Time in and time out	Day 1 Time in: 08:30 Day 1 Time out: 17:00	Day 2 Time in: NA Day 2 Time out: NA	Day 3 Time in: NA Day 3 Time out: NA
B: Number of auditor days used:	2 AUDITORS x 1 DAY		
C: Audit type:	<input checked="" type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define		
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 22 February – 5 March 2021 <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: If No, why not?		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	NECLA BUYUK – QUALITY MANAGEMENT SYSTEM REPRESENTATIVE		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	N/A		
J: Previous audit type:	N/A		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives

A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	There was no worker committee at the facility. There were 3 worker representatives at the facility. 1 worker representative was included in employee interviews.		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	There is no union in the facility.		

Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	82	0	16	4	0	0	0	102
Worker numbers – female	25	0	10	0	0	0	0	35
Total **	107	0	26	4	0	0	0	137
Number of Workers interviewed – male	2	0	1	1	0	0	0	4
Number of Workers interviewed – female	2	0	0	0	0	0	0	2
Total – interviewed sample size	4	0	1	1	0	0	0	6

**Including administrative employees



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

Worker Interview Summary		
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	0	
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 4	D2: Female: 2
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details	
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent	
H: What was the most common worker complaint?	None	
I: What did the workers like the most about working at this site?	Payments, social insurance, management attitude, working conditions.	
J: Any additional comment(s) regarding interviews:	Employees enjoy working at this facility, they said that they had a good relationship with management.	
K: Attitude of workers to hours worked:	Employees declared that, working hours are comfortable. Also, they expressed that they sometimes wanted to work extra, to earn more money, however they could turn down overtime if they wanted.	
L. Is there any worker survey information available?		
<input type="checkbox"/> Yes		

No

L1: If yes, please give details:

M: Attitude of workers:

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

The general attitude of the employees was positive. Payment is on time. Positive issues raised by the employees. They were paid at least minimum wage and always paid on time. There is no discrimination, harassment, abuse or forced labour.

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

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

No negative comment was noted during the worker representative interview.

O: Attitude of managers:

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

Management was helpful during the audit process.

Audit Results by Clause

0A: Universal Rights covering UNGP

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

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

The facility has social compliance policy and procedures that includes supplier management.

Social compliance responsible is authorized as Mehmet Yavuz Yüksel-Social Compliance Responsible

The facility has grievance mechanism for both internal and external business partners.

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

Details:

Social compliance policy and related procedures

Authorization letter of social compliance responsible

Supplier chain mapping

Supplier and contractors choosing and evaluating procedure

Grievance Mechanism Feedbacks

Management interview

Employee interviews

Any other comments:

None

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: The facility has detailed social compliance policy that includes human rights.</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Mehmet Yavuz Yüksel Job title: Social Compliance Responsible</p>
<p>C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: The facility has suggestion boxes placed at several places.</p>
<p>D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details</p>
<p>E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The facility has detailed privacy procedures for worker's information. Also, the feedbacks getting from suggestion boxes are evaluating by the management in a confidential way.</p>

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

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

Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 2019 _____ % NOT PROVIDED	A2: This year 2020 __8,3__ %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	10,1%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 2019 _____ % NOT PROVIDED	C2: This year __6,1__ %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	5,3 %	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: The accident record system was available.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: 2019 Number: NOT PROVIDED	F2: This year: Number: 3
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	0	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: NOT PROVIDED	H2: This year: 0.25
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months __0__% workers	I2: 12 months __0__% workers

J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months ___0___% workers	J2: 12 months ___0___% workers
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0B: Management system and Code Implementation (Click here to return to summary of findings)
<p>0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p> <p>0.B.2 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with</p> <p>0.B.3 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.</p> <p>0.B.4 Suppliers are expected to communicate this Code to all employees.</p> <p>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.</p>

Current Systems and Evidence Examined <i>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.</i>
<p>Current systems: The facility has disciplinary procedures and work rules. All posted onsite. All social compliance issues are managed and monitored internally. The employees have information regarding social compliance, social and legal rights. The facility management has already posted ETI Base code on notice boards. The facility has its own documented social policy that covers all issues mentioned in ETI Base Code.</p> <p>Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):</p> <p>Details: Management interview Employee interviews Training records Company policies</p> <p>Any other comments: None</p>

Management Systems:	
A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: Please give details: NA
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Policies and procedures about reducing the risk of forced labour, child

	labour, discrimination and harassment & abuse are available.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	<p>Policies exist for all areas (Forced labour, Health and Safety, Wages, Working Hours, and No harsh treatment, Environment, Business Ethics, Child Labour, Recruitment, Discrimination and Sub-contracting.), these are communicated to workers via poster and annual training.</p> <p>Except grievance mechanism training which employees should be taken. Please refer to OBS#1</p> <p>Through documents review and workers interview, policy on 'No harsh treatment and Environment' was fully in compliance with the code.</p> <p>Workers stated no forced labour, no child labour was found (through interview and document checks), there were both female and male among management/supervisors.</p>
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: These policy and procedures are communicated to all staff through posters and also communicated as a part of orientation training.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Training records are available.
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: ISO 9001 Validity date: 08.07.2023
G: Is there a Human Resources manager/department? If Yes, please detail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: ABDULLAH KOCAK-HR MANAGER
H: Is there a senior person / manager responsible for implementation of the code	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: NECLA BUYUK – QUALITY MANAGEMENT SYSTEM REPRESENTATIVE
I: Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: All worker information is kept on their personnel files. These files are kept on Accounting manager' room.

<p>J: Is there an effective procedure to ensure confidential information is kept confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: All worker information is kept on their personnel files. These files are kept on Accounting manager' room.</p>
<p>K: Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Health and Safety Risk assessment includes policy and procedures effectiveness.</p>
<p>L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: The facility perform a corrective action plan for the findings that addressed on risk assessment.</p>
<p>M: Does the facility have a policy/code which require labour standards of its own suppliers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: The facility has choosing and evaluating procedure for its suppliers.</p>
<p>Land rights</p>	
<p>N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: The facility has construction permit, building usage permit and business license.</p>
<p>O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: The facility has construction permit, building usage permit and business license.</p>
<p>P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: If yes, how does the company obtain FPIC: The facility has construction permit, building usage permit and business license.</p>
<p>Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: The facility has building construction permit in accordance with the law.</p>
<p>R: Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: There is no land acquisition. In case a land acquisition, the facility</p>

	applies to municipality and fulfil the obligations regarding
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details: There is no evidence of illegal appropriation of land for facility building or expansion of footprint.

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

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

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

1: Freely Chosen Employment

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

The factory has a policy against forced labour and the policy was reviewed by auditor. here 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. 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.

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

- Details:
- Policy documents
 - Worker interviews
 - Personnel files and pay-slips
 - Disciplinary records
 - Employee interviews
 - Labor contracts

Any other comments: None

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

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

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

Observation:	
<p>Description of observation: None observed</p>	<p>Objective evidence observed:</p>

<p>Local law or ETI requirement: Not applicable</p> <p>Comments: Not applicable</p>	<p>Not applicable</p>
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<p style="text-align: center;">Good Examples observed:</p>	
<p>Description of Good Example (GE): None observed</p>	<p>Objective evidence observed:</p> <p>Not applicable</p>

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

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

There is no Trade Union in the facility. Company does not restrict workers to join or form any union which is asked during interviews.
 There was an open-door policy in operation at the company. Employees may appeal their grievances or suggestions directly to their supervisors. Also, employees stated that they can use suggestion boxes to express their opinions and they can share the issues with Worker Representative.
 There are 3 worker representatives for general working conditions.

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

Details:

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

Any other comments: None

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

- Union (name)
- Worker Committee
- Other (Open-door policy, suggestion boxes, worker representatives)
- None

B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
C: Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: 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. D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes (for worker representative) <input type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A E1: Please give details: There is no union and worker committee at the facility.	
F: Name of union and union representative, if applicable:	There is no union at the facility.	F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	There are 3 worker representatives, open door policy and suggestion boxes in the facility.	G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: 08.06.2020
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes , please state how many: 1	
L: 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 no union at the facility.	

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

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

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

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

3: Working Conditions are Safe and Hygienic

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

1. General Health and Safety management
 - Potable water was freely available in all areas and test certificates were up-to-date. Sufficient clean toilets segregated by gender were available at all times to workers.
 - Health certificates for kitchen operators and the hygiene certificate for the kitchen was up-to-date and legal.
 - Risk assessment is done.
 - Emergency case plans were provided inside the facility.
 - Emergency evacuation plans were provided in the facility.
 - Injury records are kept by facility.
 - Minutes of meetings show that there are meetings once every month between the H&S committee (workers) and the H&S manager, and each point is acted on.
2. Fire Safety
 - There were at least 2 exits from each work area and these were clearly marked.
 - Firefighting equipment are adequate and checks were up-to-date.
 - Fire drills were organised and recorded annually.
 - Training had been given by fire marshals had been specially selected for extra training.
3. Electrical safety
 - All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards.
 - There were competent electricians at the site and their training certificates were available for review.
4. Chemical safety
 - All chemicals were correctly labelled.
 - Workers in the chemical store confirmed that they had been trained on correct handling procedures as well as what to do in an emergency.
5. Medical services
 - There were adequate first aid kits and they were well stocked.

- There was contracted jobsite doctor and 11 first aid certified staff.

Implemented COVID 19 precautions of the company.

* Documented procedures are available for COVID-19 regarding measurements and actions taken in case of any positive situation occurs.

* All potential contaminated staff is determined, and they all are quarantined for 10 days period.

* Isolated quarantine room is provided.

* Risk assessment is conducted to determine high risk workers and they are in leave and paid by government as per law.

* There are documented procedures, records,

* There were limited chairs (max 2 for 1 desk) in lunch hall. Therefore, contamination risk is minimized.

* COVID-19 management committee is available and has meetings.

* Protective masks are provided for every worker.

* Additional hand disinfectants are provided especially for social areas.

* Risk assessment and emergency action plans have been renewed as covering COVID19 issues.

* Workers have been given trainings about COVID19 issues.

* At the entrance of the facility, temperature of workers and visitors are checked with digital probe.

* Social distancing is managed with proper warnings and signs.

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

Details:

- Health and safety policy
- Health and safety manual
- Health and safety committee minutes
- Training records and certificates
- Fire equipment maintenance records
- Fire drill records
- Government licenses and checks on air quality and noise level
- Sanitation permit for kitchen
- Health certificates for kitchen staff
- Potable water testing certificates
- Interviews with workers

Any other comments: None

<p>A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: The facility has Health & Safety Procedures and these procedures are shared with employees via trainings.</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The facility has a detailed Health & Safety procedure and this procedure is explained in Health and Safety trainings to employees.</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: NA</p>
<p>D: Are visitors to the site informed on H&S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: This information is provided by H & S specialist.</p>
<p>E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The facility has a separate room that meets legal requirement.</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: The first aid boxes are placed at every production area.</p>
<p>G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: The documents were reviewed</p>
<p>H: Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input type="checkbox"/> Yes N/A <input type="checkbox"/> No H1: Please give details: There is no accommodation</p>
<p>I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: The risk assessment has working hour's section.</p>
<p>J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No J1: Please give details: Pls refer NC #6</p>

<p>Recommended corrective action: It is recommended to provide that all chemicals are stored properly and secondarily containment of the chemicals is available.</p> <p>3. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: The warehouse-packaging section of the facility and the general production area fire alarm system are not integrated. The alarm activated in production is not audible in the other area.</p> <p>Local law and/or ETI requirement: 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>In accordance with the Regulation on Protection of Buildings Against Fire (19.12.2007), art 75 (1) Fire detection and warning system which is activated by manually, automatically or by warning received from a fire extinguishing system. (2) Manual fire warning is conducted with fire warning buttons. Fire warning buttons are placed on fire escape routes in the facility. Distance between fire warning button in each floor and from any point on the floor will not exceed 60 m. All fire alarm buttons will be accessible and placed from ground at least 110 cm and at most 130 cm. Art 81 (1) Processes to warn people in the building from any emergency situation can be performed by audible and visual alarm equipments</p> <p>Recommended corrective action: Please make sure that the fire alarm can be audible from all areas.</p>	<p>Facility Tour</p>
<p>4. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: There is no comprehensive watery-firefighting system periodical inspection report in the facility. The control report dated 26.08.2020 does not meet this requirement.</p> <p>Local law and/or ETI requirement: 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>In accordance with Turkish Regulation about Occupational Health and Safety circumstances using work equipments (25/04/2013) No: 28628 Addition III - Related Matters for Maintenance, Repairs and Periodical Checks Art 2.3.1 Unless otherwise specified in the relevant standards, periodic inspections of the installations are carried out annually. Periodical check period and check criteria for some installments are stated on Table 3 provided that the criteria stated in Art 2.1.1 are reserved. Table 3</p>	<p>Document review, management interview</p>

<p>Equipment: Fire fighting installment, Hoses, Motopomps, Pipe Systems Check Period (Max): 1 year</p> <p>Recommended corrective action: It is recommended to provide that the comprehensive watery-firefighting system periodical inspection report.</p>	
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Observation:	
<p>Description of observation: None observed</p> <p>Local law or ETI requirement: Not applicable</p> <p>Recommended corrective action: Not applicable</p>	<p>Objective evidence observed: Not applicable</p>

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

4: Child Labour Shall Not Be Used

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

There is no child labour in the facility.
 Child labour remediation plan which provides 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 is available.
 There is 1 young employee who is working as helper in packing section
 The youngest employee is 17 years old in the facility.
 Working hours for young employees are:
 From 08:00 to 18:30 (including 60 minutes lunch break, 2x45 minutes tea break) x 5 days
 Totally: 40 hours/ week.
 There is an informal procedure for checking ages of employees at application stage, and this includes checking ID's.

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

- Details:
 Facility tour
 Personnel list
 Personnel files
 Employee interviews
 Management interview

Any other comments: None

A: Legal age of employment:	15
B: Age of youngest worker found:	17
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

D: % of under 18's at this site (of total workers)	0.7 %
E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details N/A

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

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

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

5: Living Wages are Paid

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

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

ETI

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

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

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

Current Systems and Evidence Examined

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

Current systems:

All employees are paid at least legal minimum wage

There was no employee under the legal minimum wage.

All employees were covered with social insurance.

Payments of the employees were done via bank accounts.

Payment date is between 1-5th of each month.

Pay slips were provided to all employees regularly.

Employees were informed with written and understandable information about their employment conditions and wages through labour contracts.

No deduction applied for disciplinary reasons.

10 employees' attendance records and payroll records of April 2020 (non peak month), October 2020 (peak month) and January 2021 (last-paid month) were reviewed.

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

Details: Payment records

Time records

Leave records

Social insurance records

Employee interviews

Management interview

Any other comments:

None

Non-compliance:

1. Description of non-compliance:

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

There are 23 "daily" employees working in the packaging and montage sections of the facility. These employees work 9 (net) hours a day like other facility production employees. As a result of the work and payment records reviewed, it was noted that the relevant employees were not paid 1 full-day weekly holiday progress payment after working 45 hours a week, and no overtime payment was made after they worked 45 hours a week.

Local law and/or ETI requirement: In accordance with the Turkish Labour Law # 4857 / 2003, ARTICLE 41-Overtime is permitted for reasons such as national interests, or the basic requirements of the work or increase of production. Overtime is defined in the Law as the working hours that exceed forty-five working hours in a week. In cases where the reconciliation principle is applied, no overtime is considered even if the average weekly working hours exceed total of forty-five hours in certain weeks provided that the normal weekly working period is maintained.

The overtime pay per hour is calculated by increasing normal hourly wage at the rate of fifty percent.

Turkish Labour Law # 4857 / 2003, ARTICLE 46-The workers employed in the working places within the scope of this Law are granted at least twenty-four hours uninterrupted relaxation period (weekly holiday) within seven days time scale provided that they have executed worked during the working days fixed according to article 63.

The employer is liable to pay the wage of the weekly holidays in full without requirement of work.

In accordance with the Turkish Labour Law 4857,Article 63 the number of hours to be worked per a week is 45 in total.

This is explained as: 7.5 hrs/day x 6 days = 45 hrs per week. The calculation of salary and overtime wages is always done on this basis which is 7.5 hrs/day x 30 days of

month= 225 hrs /month. (please note that the all weekends and holidays are also paid as if employees work. So 30 days are paid according to the law)

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.

Recommended corrective action: Please make progress payments and overtime payments to employees within the scope of the relevant labor law when necessary.

Objective evidence observed:

(where relevant please add photo numbers)

Document review, management interview, workers interview

Observation:

Description of observation: None observed

Local law or ETI requirement: Not applicable

Objective evidence observed:

Not applicable

Comments: Not applicable	
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Good Examples observed:	
Description of Good Example (GE): Meal and transportation are provided free of charge to all employees.	Objective Evidence Observed: Document review, management interview, workers interview

Summary Information

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal maximum: 45 hours/week for adult employees, 40 hours/week for young employees,	A1: 45 hours/week for adult employees, 40 hours/week for young employees,	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No There is no CBA in the facility
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal maximum: 11 total working hours per day (regular + overtime), 270 overtime hours per year	B1: 11 total working hours per day (regular + overtime), 270 overtime hours per year, No overtime for April 2020 (non peak month), October 2020 (peak month) and January 2021 (last-paid month).	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No There is no CBA in the facility
C: Wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: 2324,70 TL/month for 2020, 2825,90	C1: According to the documents examined at least above the	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No There is no CBA in the facility

	TL/Month for 2021 (Net-including subsistence allowance)	legal minimum pay was paid to all workers. 2324,70 TL/month for 2020, 2825,90 TL/Month for 2021 (Net-including subsistence allowance)	
D: Overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: 150% for overtime in weekdays and weekends.	D1: For production and meal service (contractor) workers: 150% For packing service provided by agency: Pls Refer NC#5	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No There is no CBA in the facility

Wages analysis: (Click here to return to Key Information)		
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
A1: If No , why not?	N/A	
B: Sample Size Checked <i>(State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	10	
C: Are there different legal minimum wage grades? If Yes , please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	C1: If Yes , please give details: N/A
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	D1: If No , please give details: N/A
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> 2324,70 TL/month for 2020, 2825,90 TL/Month for 2021 (Net- including subsistence allowance)

F: Please indicate the breakdown of workforce per earnings:	F1: <u>0</u> % of workforce earning under minimum wage F2: <u>40</u> % of workforce earning minimum wage F3: <u>60</u> % of workforce earning above minimum wage	
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: No bonus payment was done. <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i>	
H: What deductions are required by law e.g. social insurance? Please state all types:	Social insurance and taxes	
I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that have been made. 1. Tax 2. Social insurance Please describe: Legal deductions
		I2: Please list all deductions that have not been made. 1. Food 2. Transportation Please describe: Meal is provided free of charge to all employees. Transportation allowances are monthly paid to employees
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	K1: Type N/A <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: It was verified with interviews that all worked times were reflected on the provided records.	
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info:</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time: NA	

<p>Please see SMETA Best Practice Guidance and Measurement Criteria.</p>	
<p>M2: If yes, what was the calculation method used.</p>	<p> <input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details: NA </p>
<p>N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).</p>	<p> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: Please give details: Minimum wages are updated at the beginning of each year by the Ministry of Labour and Social Security. There is no basic need wage implementation in the company to be updated or reviewed. </p>
<p>O: Are workers paid in a timely manner in line with local law?</p>	<p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No </p>
<p>P: Is there evidence that equal rates are being paid for equal work:</p>	<p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: It was confirmed with worker interviews and document review. </p>
<p>Q: How are workers paid:</p>	<p> <input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain: </p>

6: Working Hours are not Excessive

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

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

ETI

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

Information such as pay period, overtime payments and working conditions are clearly stated in the employment contract.

Workers' working hours comply with legal practices.

Overtime is voluntary and paid at 150% for production and kitchen employees.

There was no 60 hour working.

Workers in the facility were allowed with at least one day off in every 7-day period.

10 employees' attendance records and payroll records of April 2020 (non peak month), October 2020 (peak month) and January 2021 (last-paid month) were reviewed.

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

Details: Attendance records of employees were reviewed.

Interviews were conducted with employees and management.

Any other comments: None

Non-compliance:

1. Description of non-compliance:

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

Objective evidence observed:
(where relevant please add photo numbers)

Local law and/or ETI requirement: Not applicable

Not applicable

Recommended corrective action: Not applicable

Observation:

Description of observation: None observed

Objective evidence observed:

Local law or ETI requirement: Not applicable

Not applicable

Comments:
Not applicable

Good Examples observed:

Description of Good Example (GE): None observed

Objective Evidence Observed:

Not applicable

Working hours' analysis Please include time e.g. hour/week/month (Go back to Key information)					
Systems & Processes					
A. What timekeeping systems are used: time card etc.	Describe: Card scanning system				
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details				
C: Are standard/contracted working hours defined in all contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details: N/A			
D: Are there any other types of contracts/employment agreements used?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	D1: If YES, please complete as appropriate:			
		<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input checked="" type="checkbox"/> Other
		If "Other", Please define:			
		The contract type of daily workers is different and they work in a daily routine. 23 agency workers in company.			
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E1: If yes , please detail hours, %, types of workers affected and frequency Please give details: Not applicable			
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
		Maximum number of days worked without a day off (in sample):			
		6			

Standard/Contracted Hours worked		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency: Not applicable
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details: Not applicable
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 0 Hours/ Month in January 2020 (last paid month), 0 Hours/ Month in April 2020 (non-peak month) 0 Hours/ Month in October 2020 (peak month)	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	___0.6___%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Worker interviews
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of standard wages: All employees, except packaging workers, who work overtime is paid monthly in accordance with the law.(150%) For packing employees (agency employees): Please refer to NC#5
N: Is overtime paid at a premium?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	N1: If yes, please describe % of workers & frequency: All employees who work overtime is paid monthly in accordance with the law. For packing employees (agency employees): Please refer to NC#5

<p>O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.</p>	<p> <input type="checkbox"/> No N/A <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other For packing employees (agency employees): Please refer to NC#5 </p> <p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p> <p>N/A</p>
<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p>	<p> <input type="checkbox"/> Overtime is voluntary N/A <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify) </p> <p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p> <p>None</p>
<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<p> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: If yes, please give details: </p>
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<p> <input type="checkbox"/> Yes N/A <input type="checkbox"/> No </p>

7: No Discrimination is Practiced

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

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

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

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

Details:

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

Any other comments: NONE

<p>A: Gender breakdown of Management + Supervisors (Include as one combined group)</p>	<p>A1: Male: <u>77</u> % A2: Female <u>23</u> %</p>
<p>B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:</p>	<p>0</p>
<p>C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:</p>	<p> <input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found </p>

	C1: Please give details: N/A
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Professional Development

<p>A: What type of training and development are available for workers?</p>	<p>Based on employee interviews, management interviews and document review it was identified that, all employees are trained about health and safety, facility rules, disciplinary rules. Discrimination policy and procedure training are given to employees.</p>
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<p>B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If no, please give details: N/A</p>
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Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed</p> <p>Local law and/or ETI requirement: Not applicable</p> <p>Recommended corrective action: Not applicable</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>Not applicable</p>

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

Good Examples observed:

Description of Good Example (GE):
None observed

Objective Evidence Observed:
Not applicable

8: Regular Employment Is Provided

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

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

ETI

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current systems:

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.

All employees were registered to the social security.

Employees are not required to sign blank papers.

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

Details: Personnel files, employment contracts, social insurance records were checked.

Management & Employees' interviews.

Any other comments: None

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

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

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

Responsible Recruitment

All Workers	
<p>A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?</p>	<p><input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions</p> <p>A1: If any are unchecked, please describe finding and specific category(ies) of workers affected: Not applicable</p>
<p>B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>B1: If yes, please describe details and specific category(ies) of workers affected: N/A</p>

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

Migrant Workers: <i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i>	
A: Type of work undertaken by migrant workers:	There are 4 migrant workers in production.
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: None B2: Total number of (outside of local country) recruitment agencies used: None
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please describe finding: NA C2: Observations: The migrant workers enjoy working at this facility, they said that they had a good relationship with management. Also, the employees declared that, working hours are comfortable.
D: Are Any migrant workers in skilled, technical, or management roles <i>Migrant Workers (this should include all migrant workers including permanent</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: If yes, number and example of roles: NA

workers, temporary and/or seasonal workers)	
---	--

NON-EMPLOYEE WORKERS

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

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

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

<p style="text-align: center;">Contractors:</p> <p style="text-align: center;"><i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i></p>	
<p>A: Any contractors on site?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>A1: If yes, how many contractors are present, please give details:</p> <ol style="list-style-type: none"> 1. Beyaz Sayfa Berceste Yemek Hizmetleri San. ve Tic. Ltd. Sti. for catering services. 2. Bilkay Danışmanlık Ve Destek Hizmetler Anonim Şirketi for packing employees
<p>B: If Yes, how many workers supplied by contractors?</p>	<p>26</p>
<p>C: Do all contractor workers understand their terms of employment?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>C1: Please describe finding: All contractor workers know their terms of employment.</p>
<p>D: If Yes, please give evidence for contractor workers being paid per law:</p>	<p>Payroll records, personal files.</p>

8A: Sub-Contracting and Homeworking
[\(Click here to return to summary of findings\)](#)
[\(Click here to return to Key Information\)](#)

8A.1 There should be no sub-contracting unless previously agreed with the main client.
 8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.
Note to auditor on homeworking:
 Report on whether it is direct or via agents. How many workers, relationship with site and what control systems are in place.
Note to auditor on subcontracting: auditor should use this section for subcontractors of part made or wholly made finished goods, this section should not be used for raw material manufacturers unless instructed otherwise by customers

Current Systems and Evidence Examined

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

Current systems:

The facility does not use subcontractor firm. There are systems and information to manage sub-contracting.

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

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

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

Details:
 Management Interview

Non-compliance:

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

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

Summary of sub-contracting – if applicable <input checked="" type="checkbox"/> Not Applicable please x	
<p>A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No A1: N/A</p>
<p>B: If sub-contractors are used, is there evidence this has been agreed with the main client?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No B1: If Yes, summarise details: N/A</p>
<p>C: Number of sub-contractors/agents used:</p>	<p>0</p>
<p>D: Is there a site policy on sub-contracting?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>

	D1: If Yes , summarise details: N/A
E: What checks are in place to ensure no child labour is being used and work is safe?	N/A

Summary of homeworking – if applicable <input checked="" type="checkbox"/> Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If Yes , summarise details: NA		
B: Number of homeworkers	B1: Male: NA	B2: Female: NA	Total: NA
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents NA		C1: If through agents, number of agents:
			NA
D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA		
E: How does the site ensure worker hours and pay meet local laws for homeworkers?	NA		
F: What processes are carried out by homeworkers?	NA		
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: NA		
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA		

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

ETI

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

Additional elements:

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

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

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

Current Systems and Evidence Examined

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

Current systems:

There was no evidence of any physical abuse or discipline, the threat of physical abuse, sexual or any other types of harassment or verbal abuse as well as any other forms of intimidation were not noted, as confirmed by the interviews.
 Disciplinary regulation was complaint with the legal regulations.
 No disciplinary action was taken.

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

Details:
 Disciplinary regulation of the facility and the personnel files of the sampled employees were reviewed.
 Suggestion boxes check book was checked.
 Employee interviews were conducted
 The relevant policy on prevention of harassment and abuse
 Internal grievance procedure documentation.
 Training records

Any other comments:

None

Non-compliance:

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

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

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

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

Additional Elements

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

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

Current Systems and Evidence Examined

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

Current systems:

There was 4 migrant (4 Syrian) worker on the facility.

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

Details:

- Personnel files
- Labour contracts
- Employee interviews
- Management interview
- Work permits

Any other comments:

None

Non-compliance:

1. Description of non-compliance:

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

Local law and/or ETI /Additional Elements requirement: Not applicable

Recommended corrective action: Not applicable

Objective evidence observed:

(where relevant please add photo numbers)

Not applicable

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

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

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

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

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

B.4. Compliance Requirements

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

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

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

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

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

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

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

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

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

B4. Guidance for Observations

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

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

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

Current Systems and Evidence Examined

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

Current systems:

The facility has a responsible person for environmental issues is Korbay Zortuk – ENVIRONMENTAL RESPONSIBLE

The facility has a written environmental policy.

The environmental impact assessment was conducted at the facility

The hazardous wastes (fluorescents and chemical containers) are disposed properly by the licensed firms.

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

Details:

Facility tour was conducted.

Document review was conducted.
 Management Interview
 Monthly assessment reports

Any other comments: None

Non-compliance:	
<p>6. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI/Additional Elements <input checked="" type="checkbox"/> NC against Local <input type="checkbox"/> NC against customer code:</p> <p>It was noted that there was no environment permit or environment out of scope letter in the facility.</p> <p>Local law and/or ETI/Additional Elements requirement: Regulation about the obligatory permits and licenses according to the Environment Law(29.04.2009) No: 27214, Article 4; facilities subject to environment permit or to environment permit and license are classified as below regarding to their impact to environment; 1- Facilities which have contaminating impact to environment at high level (Appendix 1) 2- Facilities which have contaminating impact to environment (Appendix 2) Facilities which listed at Appendix 1 or 2 are required to obtain environment permit or to environment permit and license.</p> <p>10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.</p> <p>Recommended corrective action: It is recommended to provide environment permit or environment out of scope letter</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>Document review, management interview.</p>

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

Good examples observed:

Description of Good Example (GE): None observed

Objective Evidence Observed:
Not applicable

Environmental Analysis <i>(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)</i>	
A: Is there a manager responsible for Environmental issues (Name and Position):	Korbay Zortuk – ENVIRONMENTAL RESPONSIBLE
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Facility conduct environment impact analysis for all processes
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: N/A
D: Does the site have an Environmental policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, is it publicly available? Environmental policy was available. It was posted on notice board and shared on website.
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: In the environmental policy it is addressed the key impacts from their operations and their commitment to improvement.
F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please gives details. <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: N/A
H: Have all legally required permits been shown? Please gives details.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H1: Please give details: Pls refer NC#6
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A I1: Please give details: The records were kept.
J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Client's requirements and legislation in the destination were followed and implemented as per the instructions.
K: Facility has reduction targets in place for environmental aspects e.g. water consumption	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Facility has policies for reduction in the environmental aspects.

and discharge, waste, energy and green-house gas emissions:	
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: The records for wastes handled to authorized recycling companies are available
M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: The facility monitors consumption of water, energy and natural resources.
N: Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Supplier selection and approval procedure includes environmental issues.

Usage/Discharge analysis

Criteria	Previous year: Please state period: _____ 2019 _____	Current Year: Please state period: _____ 2020 _____
Electricity Usage: Kw/hrs	46	70
Renewable Energy Usage: Kw/hrs	NOT PROVIDED	NOT PROVIDED
Gas Usage: Kw/hrs	20	40
Has site completed any carbon Footprint Analysis?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If Yes , please state result	N/A	N/A
Water Sources: Please list all sources e.g. lake, river, and local water authority.	<ul style="list-style-type: none"> • NOT PROVIDED • • 	<ul style="list-style-type: none"> • NOT PROVIDED • •
Water Volume Used: (m ³)	NOT PROVIDED	NOT PROVIDED
Water Discharged: Please list all receiving waters/recipients.	<ul style="list-style-type: none"> • NOT PROVIDED • • 	<ul style="list-style-type: none"> • NOT PROVIDED • •
Water Volume Discharged: (m ³)	NOT PROVIDED	NOT PROVIDED
Water Volume Recycled: (m ³)	NOT PROVIDED	NOT PROVIDED

Total waste Produced <i>(please state units)</i>	2000 kg	5000 kg
Total hazardous waste Produced: <i>(please state units)</i>	50 kg	60 kg
Waste to Recycling: <i>(please state units)</i>	NOT PROVIDED	NOT PROVIDED
Waste to Landfill: <i>(please state units)</i>	NOT PROVIDED	NOT PROVIDED
Waste to other: <i>(please give details and state units)</i>	NOT PROVIDED	NOT PROVIDED
Total Product Produced <i>(please state units)</i>	1000000 pieces	1500000 pieces

10C: Business Ethics – 4-Pillar Audit
[\(Click here to return to summary of findings\)](#)
 To be completed for a 4-Pillar SMETA Audit

10C. Compliance Requirements

- 10C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.
- 10C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.
- 10C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.
- 10C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.
- 10C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,
- 10C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics
- 10C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.

10C. Guidance for Observations

- 10C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.
- 10C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented

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

Current Systems and Evidence Examined

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

Current systems:

The supplier has received and acknowledged the Business Ethics policy of the auditor/audit company. The facility complies with all fiscal legislative requirements. The facility has a designated person responsible for implementing standards concerning Business Ethics who are NECLA BUYUK – QUALITY MANAGEMENT SYSTEM REPRESENTATIVE. The facility has a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Ethics. As a minimum, the business meets the requirements of local and national laws regarding bribery, corruption or any form of fraud Business Practices.

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

Details: Documents review

Any other comments: None

Non-compliance:

1. Description of non-compliance:

NC against ETI/Additional Elements
 NC against customer code:

NC against Local

None observed

Local law and/or ETI/Additional Elements requirement: Not applicable

Recommended corrective action:
 Not applicable

Objective evidence observed:
 (where relevant please add photo numbers)

Not applicable

Observation

Description of observation:
 None observed

Local law or ETI/Additional elements requirement: Not applicable

Comments:
 Not applicable

Objective evidence observed:

Not applicable

Good examples observed:

Description of Good Example (GE): None observed

Objective Evidence Observed:

Not applicable

<p>A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?</p>	<p><input checked="" type="checkbox"/> Internal Policy <input checked="" type="checkbox"/> Policy for third parties including suppliers</p> <p>A1: Please give details: The facility has a Business Ethics Policy and the policy was communicated and applied internally, externally.</p>
<p>B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>B1: Please give details: Company gives training to relevant personnel on business ethics.</p>
<p>C: Is the policy updated on a regular (as needed) basis?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>C1: Please give details: The policy updated when it is needed and monitored by NECLA BUYUK – QUALITY MANAGEMENT SYSTEM REPRESENTATIVE</p>
<p>D: Does the site require third parties including suppliers to complete their own business ethics training</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>D1: Please give details: N/A</p>

Other findings

Other Findings Outside the Scope of the Code
NONE

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

Appendix 1

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

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

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

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

<p>provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.</p> <p>Additional Elements: Responsible Recruitment 8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements. 8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation. 8.5 Employment agencies must only supply workers registered with them. 8.6 Workers pay no recruitment fee at any stage of the recruitment process. 8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.</p>	
<p>8A: Sub-Contracting and Homeworking</p>	<p>8A: Sub-Contracting and Homeworking</p>
<p>8A.1 There should be no sub-contracting unless previously agreed with the main client. 8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.</p>	
<p>ETI 9. No harsh or inhumane treatment is allowed</p>	<p>ETI 9. No harsh or inhumane treatment is allowed</p>
<p>9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. Additional elements: 9.2 companies should provide access to a confidential grievance mechanism for all workers</p>	
<p>10. Other Issue areas: 10A: Entitlement to Work and Immigration</p>	
<p>Additional Elements 10A.1 Only workers with a legal right to work shall be employed or used by the supplier. 10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.</p>	
<p>10. Other issue areas 10B2: Environment 2-Pillar</p>	

<p>10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits. 10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements. <i>Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.</i></p>	
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SMETA Extra Sections for 4 Pillar Audit:	SMETA Extra Sections for 4 Pillar Audit:
Environment Section	Environment Section
<p>B.4. Compliance Requirements 10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards. 10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc. 10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements 10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers. 10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes. 10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4-pillar audit report and audit checks for details). 10B4.7 Businesses shall make continuous improvements in their environmental performance. 10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation 10B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance. B4. Guidance for Observations 10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor. 10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.</p>	
Business Practices Section	

10C. Compliance Requirements

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

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

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

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

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

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

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

10C. Guidance for Observations

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

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

Photo Form

		
EMERGENCY EXIT	POTABLE WATER	EYE WASH
		
TOILETS	LOCKER ROOM	CARD SCANNING SYSTEM
		
EMERGENCY PLAN	FIRE EXTINGUISHER	FIRE ALARM BUTTON

<p>FIRE HOSE</p>	<p>ELECTRIC PANEL</p>	<p>SUGGESTION BOX</p>
<p>LUNCH ROOM</p>	<p>PRAYING ROOM</p>	<p>SMOKE DETECTOR</p>
<p>SPRINKLER SYSTEM</p>	<p>FIRST AID KIT</p>	<p>ETI BASE CODE</p>
<p>DOCTOR ROOM</p>	<p>OUTVIEW OF THE FACILITY</p>	<p>PACKING</p>

<p>STORING</p>	<p>PRODUCTION</p>	<p>MACHINE GUARD</p>

NC PHOTOS:

<p>NC #2: There are no secondary containers for the solvent barrels in the production area.</p>	<p>NC #1: It was noted that there was no automatic fire extinguishing system for the hood fan in the kitchen of the lunch hall.</p>



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

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

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

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

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

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

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

[Click here for Auditors:](#)

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




SMETA Corrective Action Plan Report (CAPR)

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 413624556	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 413694727
Business name (Company name):	OKYANUS MUTFAK ESYALARI SAN. VE DIS. TIC. LTD. STI.		
Site name:	OKYANUS MUTFAK ESYALARI SAN. VE DIS. TIC. LTD. STI. 2.SUBE/2 nd Branch		
Site address: <i>(Please include full address)</i>	Ikitelli OSBM ah. Eski Turgut Ozal Cad. No: 4 B Blok No: 105-105/A Basaksehir / Istanbul	Country:	TURKIYE / TURKEY
Site contact and job title:	NECLA BUYUK – KALITE YONETIM SISTEMI TEMSILCISI / QUALITY MANAGEMENT SYSTEM REPRESENTATIVE		
Site phone:	0090 2125497795	Site e-mail:	kys@okyanushome.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar <input checked="" type="checkbox"/> Business Ethics
Date of Audit:	22.02.2021		

Audit Company Name & Logo: 	Report Owner (payer): <i>(If paid for by the customer of the site please remove for Sedex upload)</i> OKYANUS MUTFAK ESYALARI SAN. VE DIS. TIC. LTD. STI.
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

Any exceptions to this must be recorded here (e.g. different sample size): SEDEX'in Covid19 önlemleri gereği, yalnızca 6 çalışan ile bireysel görüşme gerçekleştirilmiştir. İşletmenin denetim programla aşamasında sunduğu çalışan sayısı 100'ün altında olduğu için denetim 1,5 man-day olarak gerçekleştirilmiştir. /Due to the Covid19 measures of SEDEX, only 6 individual interviews were conducted.

The facility submitted the employee number as under 100 during the audit planning phase. Therefore, the audit was conducted as 1,5 man-days.

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

Lead auditor: ORHAN BUYUKCAM (AUDITOR, RA)

Team auditor: BERK COSAR (AUDITOR ,ASCA)

Interviewers: BERK COSAR (AUDITOR ,ASCA) , ORHAN BUYUKCAM (AUDITOR, RA)

Report writer: ORHAN BUYUKCAM (AUDITOR ,ASCA)

Report reviewer: NESE SEVILIR (Report Reviewer) AUDITOR, RA

Date of declaration: 22.02.2021

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

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

Audit Parameters

Audit Parameters			
A: Time in and time out	Day 1 Time in: 08:30 Day 1 Time out: 17:00	Day 2 Time in: NA Day 2 Time out: NA	Day 3 Time in: NA Day 3 Time out: NA
B: Number of auditor days used:	2 DENETCI X 1 GUN /2 AUDITORS x 1 DAY		
C: Audit type:	<input checked="" type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define:		
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 22 SUBAT - 5 MART 2021 /22 February – 5 March 2021 <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not;		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	NECLA BUYUK – KALITE YONETIM SISTEMI TEMSILCISI / QUALITY MANAGEMENT SYSTEM REPRESENTATIVE		
H: Is further information available (if yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	N/A		
J: Previous audit type:	N/A		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	İşletmede çalışan komitesi bulunmamaktadır. İşletmede 3 çalışan temsilcisi vardır. 1 çalışan temsilcisi çalışan görüşmelerine dahil edilmiştir. /There was no worker committee at the facility. There were 3 worker representatives at the facility. 1 worker representative was included in employee interviews.		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	N/A. İşletmede sendika bulunmamaktadır / There is no union in the facility.		

Guidance

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

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

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

Root cause (see column 4)

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

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

Next Steps:

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

Corrective Action Plan

Corrective Action Plan – non-compliances

Non-Compliance Number <i>The reference number of the non-compliance from the Audit Report, for example, Discrimination No.7</i>	New or Carried Over <i>Is this a new non-compliance identified at the follow-up or one carried over (C) that is still outstanding</i>	Details of Non-Compliance <i>Details of Non-Compliance</i>	Root cause <i>(completed by the site)</i>	Preventative and Corrective Actions <i>Details of actions to be taken to clear non-compliance, and the system change to prevent re-occurrence (agreed between site and auditor)</i>	Timescale <i>(Immediate, 30, 60, 90, 180, 365)</i>	Verification Method <i>Desktop / Follow-Up [D/F]</i>	Agreed by Management and Name of Responsible Person: <i>Note if management agree to the non-compliance, and document name of responsible person</i>	Verification Evidence and Comments <i>Details on corrective action evidence</i>	Status <i>Open/Closed or comment</i>
IS SAGLIGI VE GUVENLIGI NO:3 ETI, YK	YENI	işletme yemekhane mutfağında yer alan davlumbaz için otomatik yangın söndürme sistemi mevcut değildir.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	Lütfen yemekhane mutfağında yer alan davlumbaz içine otomatik yangın söndürme sistemi sağlayınız.	30 GUN / DAYS	Masaüstü	EVET/YES		
HEALTH AND SAFETY NO:3 ETI, LL #1	NEW	It was noted that there was no automatic fire extinguishing system for the hood fan in the kitchen of the lunch hall.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	It is recommended that to provide automatic fire extinguishing system for the hood fan in the kitchen of the lunch hall.		Desktop	NECLA BUYUK – KALITE YONETIM SISTEMI TEMSILCISI / QUALITY MANAGEMENT SYSTEM REPRESENTATIVE		
IS SAGLIGI VE GUVENLIGI NO:3 ETI, YK	YENI	Üretim sahasındaki solvent bidonları için ikincil kap bulunmamaktadır.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	Lütfen tüm kimyasalların uygun şekilde depolanmasını sağlayınız ve sızıntıya karşı ikincil kap sağlayınız.	30 GUN / DAYS	Masaüstü	EVET/YES		

HEALTH AND SAFETY NO:3 ETI, LL #2	NEW	There are no secondary containers for the solvent barrels in the production area.		It is recommended to provide that all chemicals are stored properly and secondary containment of the chemicals is available.		Desktop	SYSTEM REPRESENTATIVE		
IS SAGLIGI VE GUVENLIGI NO:3 ETI, YK	YENI	İşletme depo-paketleme bölümü ile genel üretim sahası yangın alarm sistemi entegre değildir. Üretimde aktif edilen alarm, diğer alanda duyulmamaktadır.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	Lütfen yangın alarmının tüm alanlardan duyulabilir olmasını sağlayınız.	30 GÜN / DAYS	TAKIP DENETİMİ	EVET/YES NECLA BUYUK – KALITE YONETİM SİSTEMİ TEMSİLCİSİ / QUALITY MANAGEMENT SYSTEM REPRESENTATIVE		
HEALTH AND SAFETY NO:3 ETI, LL #3	NEW	The warehouse-packaging section of the facility and the general production area fire alarm system are not integrated. The alarm activated in production is not audible in the other area.		Please make sure that the fire alarm can be audible from all areas.		FOLLOW UP			
IS SAGLIGI VE GUVENLIGI NO:3 ETI, YK	YENI	İşletmede kapsamlı bir sulu yangın tesisatı fenni muayene raporu bulunmamaktadır. 26.08.2020 tarihli kontrol raporu bu gereksinimi sağlamamaktadır.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	Lütfen kapsamlı bir sulu yangın tesisatı fenni muayene raporu sağlayınız.	30 GÜN / DAYS	Masaüstü	EVET/YES NECLA BUYUK – KALITE YONETİM SİSTEMİ TEMSİLCİSİ / QUALITY MANAGEMENT SYSTEM REPRESENTATIVE		
HEALTH AND SAFETY NO:3 ETI, LL #4	NEW	There is no comprehensive watery-firefighting system periodical inspection report in the facility. The control report dated		It is recommended to provide that the comprehensive watery-firefighting system periodical inspection report.		Desktop			

		26.08.2020 does not meet this requirement.							
ÖDEMELER VE HAKLAR NO:5 ETI, YK	YENI	İşletmede paketleme ve montaj bölümlerinde görev alan toplamda 23 gündelikçi çalışan bulunmaktadır. Bu çalışanlar da diğer işletme üretim çalışanları gibi günde 9(net) saat çalışmaktadır. İncelenen çalışma ve ödeme kayıtları neticesinde, ilgili çalışanlara haftalık 45 saat çalışmaları sonrasında 1 tam gün haftalık tatil hakediş ödemesi yapılmadığı ve haftalık 45 saat çalışmaları sonrasında fazla mesai ödemesi yapılmadığı görülmüştür.	<input type="checkbox"/> Training <input type="checkbox"/> Systems <input checked="" type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	Lütfen ilgili iş kanunu kapsamında çalışanlara hakediş ve fazla mesai ödemelerini gerektiğinde yapınız.	60 GUN / DAYS	TAKIP DENETİMİ	EVET/YES NECLA BUYUK – KALITE YONETİM SİSTEMİ TEMSİLCİSİ / QUALITY MANAGEMENT SYSTEM REPRESENTATIVE		
WAGE AND BENEFITS NO:5 ETI, LL #5	NEW	There are 23 "daily" employees working in the packaging and montage sections of the facility. These employees work 9 (net) hours a day like other facility production employees. As a result of the work and payment records reviewed, it was noted that the relevant employees were not paid 1 full-day weekly holiday progress payment after working 45 hours a week, and no overtime payment was		Please make progress payments and overtime payments to employees within the scope of the relevant labor law when necessary.		FOLLOW UP			

		made after they worked 45 hours a week.							
ÇEVRE 4 PILLAR NO:10B.4 YK, ETI	YENI	İşletmede çevre izni veya çevre izni kapsam dışı yazısı yoktur.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	Lütfen çevre izni veya çevre izni kapsam dışı yazısı sağlayınız	180 GÜN/ DAYS	MASAUSTU İNCELEME	EVET/YES NECLA BUYUK – KALITE YONETIM SISTEMI TEMSILCISI / QUALITY MANAGEMENT SYSTEM REPRESENTATIVE		
ENVIRONMENT 4 PILLAR NO:10B.4 LL, ETI #6	NEW	It was noted that there was no environment permit or environment out of scope letter in the facility.		It is recommended to provide environment permit or environment out of scope letter.		DESKTOP REVIEW			

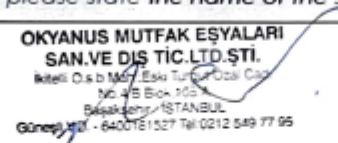
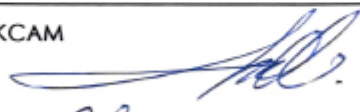

Corrective Action Plan – Observations

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

Good examples

Good example Number <i>The reference number of the good example from the Audit Report, for example, Discrimination No.7</i>	Details of good example noted	Any relevant Evidence and Comments
ODEMELER VE HAKLAR / WAGES AND BENEFITS NO: 5 #1	Yemek ve ulaşım tüm çalışanlara ücretsiz sağlanmaktadır. Meal and transportation are provided free of charge to all employees.	Employee & Management Interviews, Document Review Çalışan ve Yönetim Görüşmeleri

Confirmation

<p>Please sign this document confirming that the above findings have been discussed with and understood by you: (site management) If actual signatures are not possible in electronic versions, please state the name of the signatory in applicable boxes, as indicating the signature.</p>		
A: Site Representative Signature:	NECLA BUYUK  OKYANUS MUTFAK EŞYALARI SAN.VE DİŞ. TIC. LTD. ŞTİ. İktis. D. s. b. M. Ş. Eski Turkuva Ozal Cad. No: 4/E Blok: 102 Beşiktaş / İSTANBUL Güneşli - 34097E1527 Tel: 0212 549 77 95	Title: KALITE YONETIM SISTEMI TEMSILCISI / QUALITY MANAGEMENT SYSTEM REPRESENTATIVE Date: 22.02.2021
B: Auditor Signature:	ORHAN BUYUKCAM  BERK COSAR 	Title: BAS DENETCI / LEAD AUDITOR TAKIM DENETCISI / TEAM AUDITOR Date: 22.02.2021
C: Please indicate below if you, the site management, dispute any of the findings. No need to complete D-E, if no disputes.		
D: I dispute the following numbered non-compliances: Yoktur/None		
E: Signed: (If any entry in box D, please complete a signature on this line)	N/A	Title: N/A Date N/A
F: Any other site Comments: Yoktur/None		

Guidance on Root Cause

Explanation of the Root Cause Column

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

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

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

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

Some examples of finding a “root cause”

Example 1

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

Example 2

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

Example 3

A site uses fines to control unacceptable behaviour of workers.

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

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

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

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

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



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

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

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

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

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

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

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

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

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