



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 417816897	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 417816952
Business name (Company name):	NEFISE TEKSTIL SAN VE TIC A.S		
Site name:	NEFISE TEKSTIL SAN VE TIC A.S		
Site address: <i>(Please include full address)</i>	TEKSTILKEN MAH. 47009 SK. NO:57-59-61-63 SAHINBEY / GAZIANTEP	Country:	TURKEY
Site contact and job title:	SEVIL TEMUR – PRODUCTION MANAGER		
Site phone:	00905412390609	Site e-mail:	s.temur@nefise.com.tr
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar <input type="checkbox"/> Business Ethics
Date of Audit:	30/03/2022		

Audit Company Name & Logo: BUREAU VERITAS 	Report Owner (Payer): DALICI GRUP DANISMANLIK TEKS SAN 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)			

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): This audit includes elements beyond the scope of a Social Compliance Audit as defined by the APSCA Competency Framework. The association of the auditor's APSCA number with this report is limited to those elements outlined in the APSCA Competency Framework. APSCA makes no representations with respect to the auditor's competency to professionally evaluate compliance with any other audit elements.

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

Lead auditor: ERHAN ERGUDER	APSCA number: RA21703788
Lead auditor APSCA status: RA	
Team auditor: -	APSCA number: -
Interviewers: ERHAN ERGUDER	APSCA number: RA21703788

Report writer: ERHAN ERGUDER

Report reviewer: Mary Liu

Date of declaration: Mar 30, 2022

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"/>				<ul style="list-style-type: none"> NONE
0B Management systems and code implementation		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1			<ul style="list-style-type: none"> NC: There was a Business License in the company. However Business License does not cover all activity areas (does not cover No:59, 61 and 63 areas)
1. Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> NONE
2. Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> NONE
3. Safety and Hygienic Conditions	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	5			<ul style="list-style-type: none"> NC1: The company has an occupancy permit. However, occupancy permit does not cover all activity areas (Occupancy permit covers only 785 sqm) NC2: The height of the 2 emergency escape routes between the washing section and the knitting section of the company is less than 200 cm (with a low ceiling). There are also shuttered doors on 2 emergency escape routes.

									<ul style="list-style-type: none"> NC3: There was no first aid certificated workers in the company. (Application has been made) NC4: Fire license was not seen in the company. NC5: It was noted that internal measurements were conducted in the company. However, some noncompliance was available. (Insufficient lighting levels)
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> NONE
5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> NONE
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> NONE
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> NONE
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> NONE
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> NONE
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> NONE
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> NONE
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> NONE
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	<ul style="list-style-type: none"> N/A
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	<ul style="list-style-type: none"> N/A
General observations and summary of the site:									

- The company is a manufacturer of knitted garments.
- Ms. Sevil Temur – Production Manager was responsible to ensure that the company's implementations in compliance with ETI Base Code
- There were totally 33 employees including 3 white collared employees onsite.
- There was no child and juvenile worker on site. Youngest worker was 20 years old.
- There was no trade union in the company.
- There was 1 worker representative in the company.
- Peak seasons are; July to November
- 10 workers were selected for interviews, 6 individual and 1 group (4 workers in each group) interviews were conducted.
- No specific complaint was raised during worker interviews. Workers were aware of grievance systems.
- 10 employees' time and wage records were reviewed for the last 12 months.
- All employees were paid at least legal minimum wage.

**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:	NEFISE TEKSTIL SAN VE TIC A.S																									
B: Site name:	NEFISE TEKSTIL SAN VE TIC A.S																									
C: GPS location: (If available)	GPS Address: 37°03'21.5"N 37°24'25.6"E	Latitude: 37.055970 Longitude: 37.407107																								
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Business License date and number: 13.12.2021 - 1086																									
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Knitted garments																									
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>NEFISE TEKSTIL was established in 2019 in Gaziantep. Total closed area occupied by the company is about 1100 square meters. The building structure is concrete.</p> <table border="1"> <thead> <tr> <th>Production Building no</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Floor -1</td> <td>Yarn warehouse, raw material warehouse</td> <td>None</td> </tr> <tr> <td>Entrance Floor</td> <td>Shipping area</td> <td>None</td> </tr> <tr> <td>Floor 1</td> <td>Offices, meeting room, showroom, WC, praying room, Archive, IT</td> <td>None</td> </tr> <tr> <td>Floor 2</td> <td>Knitting section, Washing section, Lockers room, Another company (Vitrin Tekstil-Garment manufacturer)</td> <td>Another company totally isolated and taken out of the audit scope</td> </tr> <tr> <td>Floor 3</td> <td>Finished goods warehouse</td> <td>None</td> </tr> <tr> <td>Terrace</td> <td>Boiler room, Lunch hall</td> <td>None</td> </tr> <tr> <td>Is this a shared building?</td> <td>Yes</td> <td>Audited company was totally isolated from other company. Therefore other company was</td> </tr> </tbody> </table>		Production Building no	Description	Remark, if any	Floor -1	Yarn warehouse, raw material warehouse	None	Entrance Floor	Shipping area	None	Floor 1	Offices, meeting room, showroom, WC, praying room, Archive, IT	None	Floor 2	Knitting section, Washing section, Lockers room, Another company (Vitrin Tekstil-Garment manufacturer)	Another company totally isolated and taken out of the audit scope	Floor 3	Finished goods warehouse	None	Terrace	Boiler room, Lunch hall	None	Is this a shared building?	Yes	Audited company was totally isolated from other company. Therefore other company was
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	<table border="1" data-bbox="657 219 1487 286"> <tr> <td data-bbox="657 219 935 286"></td> <td data-bbox="935 219 1230 286"></td> <td data-bbox="1230 219 1487 286">taken out of the audit scope.</td> </tr> </table> <p>Monthly production capacity: 30.000 pieces.</p> <p>Population layout: 33 Administration: 2 male, 1 female Production: 26 male, 4 female</p> <p>There was no handicapped worker, migrant worker, pregnant employee workers on maternity leave and juvenile employee.</p> <p>Regular weekly working hours was arranged as follows: For knitting section; there were 3 shift system. 08.00-16.00 / 16.00-24.00 / 24.00-08.00 (including 30 minutes lunch break) x 6 days</p> <p>For washing section; there were 2 shift system. 08.00-16.00 / 16.00-24.00 (including 30 minutes lunch break) x 6 days</p> <p>For quality control section; From 08:00 to 17:30 (including 2 x15 minutes tea breaks and 60 minutes lunch break) x 5 days and Saturdays; From 08:00 to 14:15 (including 15 minutes tea break and 60 minutes lunch break)</p> <p>Time recording system: Manual time record keeping system</p> <p>Payment day: 5th of each month via bank transfer.</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: No visible structural integrity issue was observed.</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 company had a building structure construction permit that ensures the building had the seismic design in terms of architectural science.</p>			taken out of the audit scope.
		taken out of the audit scope.		
G: Site function:	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor			
H: Month(s) of peak season:	July to November			

(if applicable)	
I: Process overview: <i>(Include products being produced, main operations, number of production lines, main equipment used)</i>	There were knitting, washing and QC processes onsite. No process was outsourced.
J: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (Open door policy, complaint boxes) <input type="checkbox"/> None
K: Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No N1: If no, please give details N/A. No dormitory was provided.

Audit Parameters			
A: Time in and time out	Day 1 Time in: 09:00 Day 1 Time out: 17:00	Day 2 Time in: - Day 2 Time out: -	Day 3 Time in: - Day 3 Time out: -
B: Number of auditor days used:	1 (1 auditor 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		
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced Window details: 21 March -1 April <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	SEVIL TEMUR – PRODUCTION MANAGER		

(Name and job title)	
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:	None
J: Previous audit type:	None
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 type="checkbox"/> No (N/A)
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No (N/A)
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 type="checkbox"/> No (N/A)
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	There were 3 worker representatives onsite. 1 worker representative was included into the worker interview process.		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	There was no unionisation activity in the company.		

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	26	-	-	-	-	-	-	26
Worker numbers – female	4	-	-	-	-	-	-	4
Total	30	-	-	-	-	-	-	30
Number of Workers interviewed – male	6	-	-	-	-	-	-	6
Number of Workers interviewed – female	4	-	-	-	-	-	-	4
Total – interviewed sample size	10	-	-	-	-	-	-	10



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



Worker Interview Summary	
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	1 (4 workers in a group)
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 3 D2: Female: 3
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
H: What was the most common worker complaint?	None
I: What did the workers like the most about working at this site?	Payment on time, friendly environment
J: Any additional comment(s) regarding interviews:	None
K: Attitude of workers to hours worked:	No complaint was raised regarding working hours
L. Is there any worker survey information available?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details:	
M: Attitude of workers: <i>(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</i>	
There were totally 33 workers including 3 administrative workers onsite.	

10 workers were selected for interviews randomly or according to their age, physical appearance, health care reports, sections or personal file records. 6 individual and 1 group interviews (4 workers in a group) were conducted confidentially in an isolated meeting room. Their thoughts were asked about the workplace and working conditions.

Interviewed workers informed their pleasure about free lunch and transportation, friendly people and social insurance in the facility. No negative feedback was raised.

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

Sampled worker representative stated that workers have no complaints about their social benefits and working environment. Representative stated that they perform meetings with management as a committee on monthly basis to raise the complaints of the workers to management anonymously. No other complaint was raised.

O: Attitude of managers:

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

Upon arrival auditor was greeted by Ms. Sevil Temur – Production Manager. The company management was kind, cooperative, polite and transparent during the entire 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:

Human rights policy of the company was established.

Ms. Sevil Temur – Production Manager was assigned for implementing standards concerning human rights. Confidential grievance system in place in order to raise the complaints regarding human rights issues.

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

Details: Policies, commitment letters, appointment letters and grievance mechanism were reviewed.

Any other comments: None

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

Yes

No

A1: Please give details: Human rights policy of the company was reviewed.

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

Yes

No

Please give details:

Name: Sevil Temur

Job title: Production Manager

<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: Confidential grievance system in place in order to raise the complaints regarding human rights issues.</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: It was clearly verified that the grievance mechanism was accessible to any worker, transparent, legitimate and from this point of view it meets the UNGP requirements.</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: All documents of employees (such as ID copies etc.) were kept under controlled conditions by the accountant staff of the company. The company respects data privacy.</p>

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

Good examples observed: NONE	
<p>Description of Good Example (GE): NONE</p>	<p>Objective Evidence Observed: N/A</p>

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: 2021 3,1 %	A2: This year: 2022 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]	3 %	
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: 2021 1,2 %	C2: This year: 2022 1,1 %
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	1,1 %	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Job related accident reports were kept	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: 2021 Number: 0	F2: This year: 2022 Number: 0
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	0	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 2021 0	H2: This year: 2022 0
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months NA % workers	I2: 12 months NA % workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months NA % workers	J2: 12 months NA % workers

0B: Management system and Code Implementation

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

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

Current Systems and Evidence Examined

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

Current systems:

ETI Base Code was posted on notice board.
 Facility has appointed a senior member of management who is responsible for compliance with this code.
 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.
 Facility has communicated this code to all employees and suppliers.
 Business license was available. However Business License does not cover all activity areas (does not cover No:59, 61 and 63 areas)

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

Details: Confirmed with management interview, document review and facility tour.

Any other comments: None

Management Systems:

<p>A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: Please give details: It was confirmed with management interview.</p>
<p>B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Social compliance policies (such as prohibiting forced labour, child labour, discrimination, harassment and abuse etc.) of the company were reviewed.</p>
<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>Social compliance policies were posted on notice board.</p>

<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Training records were available.</p>
<p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Training records were reviewed. All employees were informed regarding social compliance policies at the beginning of recruitment and periodically.</p>
<p>F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please give details: Company was not certified to any internationally recognised system.</p>
<p>G: Is there a Human Resources manager/department? If Yes, please detail.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: The Company has well designed HR department.</p>
<p>H: Is there a senior person / manager responsible for implementation of the code</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Sevil Temur – Production Manager was charging to manage for implementation of the Code.</p>
<p>I: Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: All documents of employees (such as ID copies etc.) were kept under controlled conditions by the accountant staff of the company. The company respects data privacy.</p>
<p>J: Is there an effective procedure to ensure confidential information is kept confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: All documents of employees (such as ID copies etc.) were kept under controlled conditions by the accountant staff of the company. The company respects data privacy.</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: Internal assessments were conducted to evaluate policy and procedure 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: Corrective and preventative action process was in place.</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: Company sends a copy of ETI Base Code to 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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: Please give details: The company has business licence. However Business License does not cover all activity areas (does not cover No: 59, 61 and 63 areas)</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: Owner of the company is responsible to conduct legal due diligence to recognise and apply national laws and practices relating to land title.</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 company building was established on a land which has the legal land title belongs to the owner. The company provided the structure permit as well.</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 previous owner of the land was paid by the current land owner. The current land owner is also the owner of the building.</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 type="checkbox"/> Yes <input type="checkbox"/> No (N/A) R1: Please give details:</p>
<p>S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details: No any evidence of illegal appropriation of land for facility building or expansion of footprint.</p>

Non-compliance: 1

<p>Description of non-compliance: There was a Business License in the company. However Business License does not cover all activity areas (does not cover No:59, 61 and 63 areas)</p> <p><input checked="" type="checkbox"/> NC against ETI/Additional Elements <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement: Turkish Regulation on Workplace Opening and Operating Permit (10.08.2005 # 25902)</p> <p>Article 4: n) Establishment and operation license: Permission issued by competent authorities for the opening and operation of workplaces within the scope of this Regulation.</p> <p>Article 6: The workplace cannot be opened and operated without obtaining a workplace opening and working license in accordance with the procedure from competent administrations. The permits, registration and similar transactions granted by the professional bodies other than the competent administrations specified in this Regulation to the establishments in accordance with the special legislation shall not remove the license obligation to obtain licenses according to the provisions of this Regulation. Workplaces opened without opening a workplace and without a working license are closed by competent authorities.</p> <p>Additional element 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>Recommended corrective action: Business License that covers whole areas should be obtained from authorized body.</p>	<p>Objective evidence observed: Document Review</p>
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Observation: NONE	
<p>Description of observation: NONE</p> <p>Local law or ETI requirement: NONE</p> <p>Comments: NONE</p>	<p>Objective evidence observed: N/A</p>

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

1: Freely Chosen Employment

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

ETI

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

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

Current Systems and Evidence Examined

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

Current systems:

Employment is freely chosen.
 No guards present during working hours.
 Movement of employees at the facility is not prohibited or limited.
 Employees have free access to toilets and drinkable water.
 Overtimes are always performed on voluntary basis.
 The factory does not require deposit or withhold employees' ID cards.
 The factory does not limit the employees' freedom.
 There is no forced, bonded or involuntary prison labour.
 Employees are free to leave their employer after reasonable notice.

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

Details: Confirmed with management and employee interviews and facility tour. Labour contracts, company rules and disciplinary rules were reviewed.

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>
<p>D: Are there any restrictions on workers' freedom to terminate employment?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding:</p>

E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding:
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding: Workers are free to leave the site at the end of the work day.
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected: The Company sends ETI Base Code to its supply chain.
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 Company sends ETI Base Code to its supply chain and suppliers were visited occasionally in order to prevent forced / trafficked labour issues.

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

Observation: NONE	
Description of observation: NONE Local law or ETI requirement: NONE Comments: NONE	Objective evidence observed: N/A

Good Examples observed: NONE	
Description of Good Example (GE): NONE	Objective evidence observed: N/A

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

There is no union in the facility.
 Suggestion and complaint boxes are in the facility.
 There is an open-door policy that employees can complain directly to the top management.
 There were 3 freely elected worker representative.
 Worker representative election was performed on 14.03.2022
 Employees feel free to join trade union as per interviews.

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

Details: Confirmed with management and employee interviews. Complaint box records, worker representative election records are reviewed.

Any other comments: None

<p>A: What form of worker representation/union is there on site?</p>	<p><input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee(Worker Representative) <input checked="" type="checkbox"/> Other (Open door policy and compliant boxes) <input type="checkbox"/> None</p>
<p>B: Is it a legal requirement to have a union?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>C: Is it a legal requirement to have a worker's committee?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Open door policy and compliant box systems were in place to ensure effective worker/management communication. D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes</p>

	<input type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: It was confirmed with worker interview that worker representatives are free to perform meetings with employees. Adequate facilities were provided by the management.	
F: Name of union and union representative, if applicable:	There was no unionisation activity in the company.	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 were 3 freely elected worker representative onsite	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: 14.03.2022
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please state how many: 1	
L: Please describe any evidence that union/worker's committee is effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i>	The last meeting between worker representative and management was performed in March 2022. Grievances of employees were discussed.	
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: <u>NA</u> % workers covered by Union CBA	M2: <u>NA</u> % 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: NONE

1. Description of non-compliance: NONE

Objective evidence observed: N/A

<input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: Local law and/or ETI requirement: NONE Recommended corrective action: NONE	
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Observation: NONE	
Description of observation: NONE Local law or ETI requirement: NONE Comments: NONE	Objective evidence observed: N/A

Good Examples observed: NONE	
Description of Good Example (GE): NONE	Objective evidence observed: N/A

3: Working Conditions are Safe and Hygienic

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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:

Working environment is generally safe. Risk assessment is up to date. Emergency evacuation plans are provided in the facility. Injury records are kept by facility. Minutes of meetings meet regularly between the H&S committee (workers) and the Company Owner, and each point is acted on. There were adequate first aid kits in each production area and they were well stocked. There are contracted occupational doctor and OHS expert. The risks and action plans regarding covid-19 pandemic are integrated with risk assessment report and emergency action plan report. The facility has taken the necessary measures to protect its employees from Coronavirus; PPE, hand disinfectant, compliance with social distance rule, etc.

Emergency exits are clearly marked. There are emergency exits from each work area. Firefighting equipment checks are up-to-date. Fire drills were organised and recorded once in a year. Last evacuation drill date was 18&19.03.2022. Training had been given by fire marshals had been specially selected for extra training. Fire alarm is provided and active.

All electrical equipment, electricity panels, are maintained in good condition such as sockets, plugs, switches and main fuse boards.

Potable water was freely available in all areas and test certificates were up-to-date. Enough clean toilets segregated by gender were available always to workers. Health certificates for kitchen operator and the hygiene certificate for the kitchen was up-to-date and legal.

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

Details: Periodical inspection records of pressure & levering equipment, health check reports, H&S training records, drinking water analysis records, risk analysis record, first aid trained workers' certificates, fire equipment control records etc. were reviewed.

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: Health and safety policy was prepared and communicated to all workers. There was an occupational health and safety specialist of the company.</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: H&S rules and procedures of the company were distributed to whole workforce in a documented way.</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: There was a Business License in the company. However Business License does not cover all activity areas.</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: Visitors were informed on H&S and provided required personal protective equipment.</p>
<p>E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: There was an infirmary in the company which meets legal requirements.</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please give details: There was a jobsite doctor in the company. However, there was no first aid certificated workers in the company. The first aid boxes are placed at every appropriate 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 company works with professional transportation company.</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 <input type="checkbox"/> No (N/A) H1: Please give details: There was no dormitory in the company.</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: Risk analysis was conducted on 07.01.2022</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: There was no environmental permit or environmental permit exception decision letter in the</p>

	company. Besides, there was no industrial waste management plan letter of approval in the company.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: There was no banned chemical in the company

Non-compliance: 1	
<p>Description of non-compliance: The company has an occupancy permit. However, occupancy permit does not cover all activity areas (Occupancy permit covers only 785 sqm)</p> <p><input type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement: According to Law on Land Development Planning and Control (3194), Article 30, it is obligatory to obtain permission from the municipality and governorship offices that the building can be used either completely if the construction was completely finished, or partly if the building was partially completed.</p> <p>Recommended corrective action: Building usage permit (occupancy permit) which covers whole area should be obtained from authorized body.</p>	<p>Objective evidence observed: Document review</p>

Non-compliance: 2	
<p>Description of non-compliance: The height of the 2 emergency escape routes between the washing section and the knitting section of the company is less than 200 cm (with a low ceiling). There are also shuttered doors on 2 emergency escape routes.</p> <p><input type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement: In accordance with the Regulation on Protection Of Buildings Against Fire (19.12.2007), Art 31- (1) The exit way is defined as the not blocked way starting from any part of the building till the street at the ground level (2) The elevators cannot be accepted as exit way.</p> <p>In accordance with the Regulation on Protection of Buildings against Fire (19.12.2007), Art 47, (1) the net width of the evacuation exit door cannot be less than 80 cm and it height cannot be less than 200 cm. The revolving doors and turnstiles cannot be accepted as evacuation exit doors. (2) The evacuation exit doors should be opened outside if there are more than 50 persons in the place. They should not be locked and should be opened manually (3) The evacuation exit doors should not infiltrate the smoke and fire resistant at least 60 minutes if it is serving less than 4 floors and at least 90 minutes if it serving more than 4 floors. (4) The width of one wing doors cannot be less than 80 cm and more than 120 cm.</p>	<p>Objective evidence observed: Site tour</p> <p>Please refer to NC photo 1-3</p>

<p>(5) All evacuation exit doors opening safe place at the ground level and if there are more than 100 persons in one floor, evacuation exit stairs, evacuation corridors and fire safety hall doors should be opened outward without using door bars.</p> <p>(6) The doors should be opened by using at most 110 N force</p> <p>Recommended corrective action: All emergency escape routes should be fully accessible at all times.</p>	
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Non-compliance: 3	
<p>Description of non-compliance: There was no first aid certificated workers in the company. (Application has been made)</p> <p><input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: 3.2</p> <p>Local law and/or ETI requirement : In accordance with the regulation based on first aid (#29429 Date: 29.07.2015) Art.19 : It is an obligation that one out of twenty workers at low hazardous industries, one out of fifteen workers at hazardous industries and one out of ten workers at very hazardous industries should be certified to first aid training.</p> <p>ETI 3.2: Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.</p> <p>Recommended corrective action: There should be at least one certificated first aider for every 20 employees.</p>	<p>Objective evidence observed: Document Review</p>

Non-compliance: 4	
<p>Description of non-compliance: Fire license was not seen in the company.</p> <p><input type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement: (Turkish regulation on workplace opening and operating permit (10.08.2005 # 25902) Article 5: h)public places such as resting and amusement places; workplaces where explosive, inflammable and flammable materials produced, sold and stored; all workplaces which more than 30 employees employed, workplaces which not directly connected to street excluding with its main gates and office buildings etc. which more than one workplace was located should obtain fire inspection certificate which shows that necessity precautions were taken.</p> <p>Recommended corrective action: Fire License that covers whole areas should be obtained from authorized body.</p>	<p>Objective evidence observed: Document review</p>

Non-compliance: 5	
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<p>Description of non-compliance: It was noted that internal measurements were conducted in the company. However, some noncompliance was available. (Insufficient lighting levels)</p> <p><input type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement: The Turkish Regulation on risks with the protection of noise exposures on employees (28.07.13 # 28721), Article 6\1: Employer should conduct the risk assessment for employee noise exposures in the workplace. According to the results of the risk assessment; the exposure by having noise measurements shall be determined.</p> <p>Regulation based on encounter with dust , dated on 05.11.2013 – Art.8 / 1) Without prejudice to the provisions of the regulations based on laboratories that conduct analysis , tests and inspections on Work Hygiene (20/8/2013 dated with the number 28741 on official gazette) ; In workplaces where there is exposure of dust ; the employer should ;</p> <ul style="list-style-type: none"> a) Conduct dust level inspections within defined periods according to the result of risk analysis b) Renew those inspection when conditions of dust exposure is changed c) Ensure that the inspected dust levels should be within the limits defined at Appendix-I d) Ensure that those inspections should be conducted by laboratories which had been accredited or pre-accredited by General Management. <p>Recommended corrective action: Measurements with appropriate results should be provided.</p>	<p>Objective evidence observed: Document Review</p>
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Observation: NONE	
<p>Description of observation: NONE</p> <p>Local law or ETI requirement: NONE</p> <p>Recommended corrective action: NONE</p>	<p>Objective evidence observed: N/A</p>

Good Examples observed: NONE	
<p>Description of Good Example (GE): NONE</p>	<p>Objective Evidence Observed: N/A</p>

4: Child Labour Shall Not Be Used

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

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 was no child and juvenile worker on site. 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. Youngest worker was 20 years old.

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

Details: ID copies, child labour policy and recruitment procedure were reviewed.

Any other comments: None

A: Legal age of employment:	Completed 15
B: Age of youngest worker found:	20 years old
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0 %
E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	<input type="checkbox"/> Yes <input type="checkbox"/> No (N/A) E1: If yes, give details

Non-compliance: NONE

1. Description of non-compliance: NONE

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

Local law and/or ETI requirement: NONE

Objective evidence observed: N/A

Recommended corrective action: NONE	
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Observation: NONE	
Description of observation: NONE Local law or ETI requirement: NONE Comments: NONE	Objective evidence observed: N/A

Good Examples observed: NONE	
Description of Good Example (GE): NONE	Objective Evidence Observed: N/A

5: Living Wages are Paid

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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:

Wages are paid 5th of each month via bank transfer.
 There was no employee under the legal minimum wage.
 All employees are given a detailed pay slip.
 All employees are covered with social security.
 All production employees' wages were calculated by hourly rate.
 All employees are 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.
 Benefits of paid and annual leave were given to all employees.
 All social insurance payments were passed on to the relevant authorities in a timely manner.

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

Details: Confirmed with employee, management interviews and document review (i.e: payment records, social insurance fund, annual leave records, pay slips etc.) in accordance with SMETA Best Practice Guidance and Local Law.

Any other comments: None

Non-compliance: NONE

1. Description of non-compliance: NONE

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

Local law and/or ETI requirement: NONE

Recommended corrective action: NONE

Objective evidence observed: N/A

Observation: NONE	
Description of observation: NONE Local law or ETI requirement: NONE Comments: NONE	Objective evidence observed: N/A

Good Examples observed: 2	
Description of Good Example (GE): 1- Meal is provided free of charge to employees. 2- Transportation is provided free of charge to night shift employees.	Objective Evidence Observed: Document Review, Management Declaration and Worker 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 workers	A1: 45 hours /week	A2: <input type="checkbox"/> Yes (N/A) <input type="checkbox"/> No
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal maximum: 270 hours per year	B1: 97 hours/year	B2: <input type="checkbox"/> Yes <input type="checkbox"/> No (N/A)
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: 3557,50 TRY (gross)	C1: 5.004,00 TRY (gross)	C2: <input type="checkbox"/> Yes <input type="checkbox"/> No (N/A)
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% of hourly wage for each working practice duration over 45 hours/week. (This is the only overtime wage premium defined in Turkish labour law)	D1: 150% of hourly wage	D2: <input type="checkbox"/> Yes <input type="checkbox"/> No (N/A)

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 samples from July 2021 (Randomly selected) 10 samples from October 2021 (Peak selected) 10 samples from February 2022 (Current)		
C: Are there different legal minimum wage grades? If Yes , please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	C1: If Yes , please give details: -	
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	D1: If No , please give details: -	
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	E1: Lowest actual wages found: 5.004,00 TRY (gross)	
F: Please indicate the breakdown of workforce per earnings:	F1: 0 % of workforce earning under minimum wage F2: 10 % of workforce earning minimum wage F3: 90 % of workforce earning above minimum wage		
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: No bonus scheme was applied		
H: What deductions are required by law e.g. social insurance? Please state all types:	Social insurance, tax, unemployment benefit		
I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that have been made.	1. Social insurance 2. Tax 3. Unemployment benefit Please describe: Above mentioned deductions were made by the company and paid to governmental social security system.
		I2: Please list all deductions that have not been made.	N/A

			Please describe: All legally required deductions were made on wage.
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	K1: Type <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	
L: Do records reflect all time worked? (For instance, are workers asked to 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: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	M1: Please specify amount/time: N/A	
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details: N/A		
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input 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.	
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	P1: Please give details: It was confirmed with worker interviews and document review.	
Q: How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other	Q1: If other, please explain: -	

6: Working Hours are not Excessive

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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:

Regular weekly working hours was arranged as follows:

For knitting section; there were 3 shift system. 08.00-16.00 / 16.00-24.00 / 24.00-08.00 (including 30 minutes lunch break) x 6 days

For washing section; there were 2 shift system. 08.00-16.00 / 16.00-24.00 (including 30 minutes lunch break) x 6 days

For quality control section; From 08:00 to 17:30 (including 2 x 15 minutes tea breaks and 60 minutes lunch break) x 5 days and Saturdays; From 08:00 to 14:15 (including 15 minutes tea break and 60 minutes lunch break)

Time recording system: Manual time record keeping system

Through employees' interview, overtime was voluntary.

Records and employee interviews showed that workers had at least 1 day off per week.

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

Details: 10 employees' time records were reviewed.
 Any other comments: None

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

Observation: NONE	
Description of observation: NONE Local law or ETI requirement: NONE Comments: NONE	Objective evidence observed: N/A

Good Examples observed: NONE	
Description of Good Example (GE): NONE	Objective Evidence Observed: N/A

Working hours' analysis <i>Please include time e.g. hour/week/month</i> <i>(Go back to Key information)</i>	
Systems & Processes	
A. What timekeeping systems are used: time card etc.	<i>Describe:</i> Manual time record keeping 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	<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

contracts/employment agreements?		
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D1: If YES, please complete as appropriate:
		<input type="checkbox"/> 0 hrs <input type="checkbox"/> Part time <input type="checkbox"/> Variable hrs <input type="checkbox"/> Other
		If "Other", Please define:
		N/A
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E1: If yes , please detail hours, %, types of workers affected and frequency Please give details: N/A
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain: N/A	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		Maximum number of days worked without a day off (in sample):
		6 days
Standard/Contracted Hours worked		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency:
		NA
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	H1: If yes, please give details:
		Regulation based on working hours related to labour law (Official gazette date; 06.04.2004 / 25425; Art 5; By written agreement of both sides; weekly regular working hours can be distributed to working days without exceeding 11 hours a day. This arrangement could be made within 2 months window and total regular working time could not exceed obligated regular working time within this period.
Overtime Hours worked		

<p>I: Actual overtime hours worked in sample (State per day/week/month)</p>	<p>Highest OT hours: July 2021: 2 hours per day, 8 hours per week, 32 hours per month October 2021: 2 hours per day, 11 hours per week, 35 hours per month February 2022: 2 hours per day, 9 hours per week, 33 hours per month</p>	
<p>J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	
<p>K: Approximate percentage of total workers on highest overtime hours:</p>	<p>10 %</p>	
<p>L: Is overtime voluntary?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information</p>	<p>L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: It was confirmed with worker interviews</p>
<p>Overtime Premiums</p>		
<p>M: Are the correct legal overtime premiums paid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium</p>	<p>M1: Please give details of normal day overtime premium as a % of standard wages: 150% of hourly wage for each working practice duration over 45 hours/week.</p>
<p>N: Is overtime paid at a premium?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>N1: If yes, please describe % of workers & frequency: All employees who work overtime is paid monthly in accordance with the law.</p>
<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 <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other</p> <p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p> <p>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 <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>N/A</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: N/A </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

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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: There was 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. 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: Confirmed with employee, management interviews and document review in accordance with SMETA Best Practice Guidance and Local Law.

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: 66,67 % A2: Female 33,33 %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	There was 1 female administrative workers in the company.
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found C1: Please give details: N/A

Professional Development

A: What type of training and development are available for workers?	All workers were given occupational health and safety and quality trainings periodically. Discrimination policy and procedure training are given to employees.
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B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details: N/A
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Non-compliance: NONE

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

<p>Description of observation: NONE</p> <p>Local law or ETI requirement: NONE</p> <p>Comments: NONE</p>	<p>Objective evidence observed: N/A</p>
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Good Examples observed: NONE

<p>Description of Good Example (GE): NONE</p>	<p>Objective Evidence Observed: N/A</p>
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8: Regular Employment Is Provided

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

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

ETI

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current systems: All workers have their well-prepared personal files and signed labour contracts. 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. No temporary worker, apprenticeship schemes or home worker was identified by the auditor.

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

Details: Document review (personnel files and labour contracts) and worker declarations.

Any other comments: None

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

Observation: NONE	
<p>Description of observation: NONE</p> <p>Local law or ETI requirement: NONE</p> <p>Comments: NONE</p>	<p>Objective evidence observed: N/A</p>

Good Examples observed: NONE	
<p>Description of Good Example (GE): NONE</p>	<p>Objective Evidence Observed: N/A</p>

Responsible Recruitment

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

C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – C1: If other, please give details:
D: If any checked, give details:	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 was no migrant worker in the company
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: - B2: Total number of (outside of local country) recruitment agencies used: -
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 (N/A) <input type="checkbox"/> No C1: Please describe finding: N/A C2: Observations: N/A
D: Are Any migrant workers in skilled, technical, or management roles <i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i>	<input type="checkbox"/> Yes N/A <input type="checkbox"/> No D1: If yes, number and example of roles: N/A

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 <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other B1 – If other, please give details:
C: If any checked, give details:	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: There was no agency used.
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No (N/A)
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No (N/A)
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No (N/A) D1: Please give details:
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No (N/A) E1: Please give details: N/A

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

8A: Sub-Contracting and Homeworking

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

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

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

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

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems: No subcontractor is used for any process. All processes were performed in the facility.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate): Site tour (Calculation on total production and estimated capacity), materials in/out records, management interview, worker interviews

Details: None

Non-compliance: NONE

1. Description of non-compliance: NONE

NC against ETI/Additional Elements NC against Local Law

NC against customer code:

Local law and/or ETI /Additional Elements requirement: NONE

Recommended corrective action: NONE

Objective evidence observed: N/A

Observation:

Description of observation: NONE

Local law or ETI/Additional elements requirement: NONE

Comments: NONE

Objective evidence observed: N/A

Good Examples observed: NONE	
Description of Good Example (GE): NONE	Objective Evidence Observed: N/A

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

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

G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details:
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No

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

ETI

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

Additional elements:

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

<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: The hotline number of the Ministry of Labour and Social Security (Hotline: 170) is posted at notice boards for workers to raise any issue to official authorities.</p>
<p>B: If Yes, are workers aware of these channels and have access? Please give details.</p>	<p>Workers stated that they were aware of this channel during the interviews.</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>Hotline, open door policy, compliant boxes, freely elected worker representatives</p>
<p>D: Which of the following groups is there a grievance mechanism in place for?</p>	<p><input checked="" type="checkbox"/> Workers <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other D1: Please give details: Open door policy, compliant boxes, freely elected worker representatives</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</p>
<p>F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: If no, please give details</p>
<p>G: Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain</p>
<p>H: If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: If no, please give details</p>
<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No I1: If yes, please give details</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 physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation which confirmed by worker interviews. Confidential grievance mechanism was in place. 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: No finding noted regarding this section. Confirmed with employee interviews and grievance records.

Any other comments: None

Non-compliance: NONE

1. Description of non-compliance: NONE

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

Local law and/or ETI requirement: NONE

Recommended corrective action: NONE

Objective evidence observed: N/A

Observation: NONE

Description of observation: NONE

Local law or ETI requirement: NONE

Comments: NONE

Objective evidence observed: N/A

Good Examples observed: NONE

Description of Good Example (GE): NONE

Objective Evidence Observed: N/A

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: No migrant employee in the facility.

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

Details: Confirmed with interviews and document review in accordance with SMETA Best Practice Guidance and Local Law.

Any other comments: None

Non-compliance: NONE

1. Description of non-compliance: NONE

NC against ETI/Additional Elements NC against Local Law
 NC against customer code:

Objective evidence observed: N/A

Local law and/or ETI /Additional Elements requirement: NONE

Recommended corrective action: NONE

Observation: NONE

Description of observation: NONE

Local law or ETI/Additional Elements requirement: NONE

Comments: NONE

Objective evidence observed: N/A

Good examples observed: NONE

Description of Good Example (GE): NONE

Objective Evidence Observed: N/A

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems: There is written environmental policy at the facility.

There was no environmental permit or environmental permit exception decision letter in the company.

There was no industrial waste management plan letter of approval in the company.

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

Details: Confirmed with document review (Waste control documents, procedures, policies and logs.) and site tour.

Any other comments: None

Non-compliance: 1

Description of non-compliance: There was no environmental permit or environmental permit exception decision letter in the company

NC against ETI/Additional Elements NC against Local Law

Local law and/or ETI/Additional Elements requirement:

Environmental Permit and Licence Regulations 10.09.2014

Facilities subject to environmental permit and licence

ARTICEL 5 – (1) Facilities that subject to environmental permit or environmental permit and licence within the scope of this regulation are categorized according to environmental impacts of them in the Appendix-1 and Appendix-2.

(2) First of all, facilities listed in Appendix-1 and Appendix-2 have to obtain temporary operating certificate to operate in.

(3) Facilities obtain temporary operating certificate have to obtain environmental permit or environmental permit and licence certificate within one year until the issue date of the certificate.

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

Objective evidence observed: Document review

Recommended corrective action: Environmental permit or environmental permit exception decision letter should be obtained from authorized body	
--	--

Non-compliance: 2	
<p>Description of non-compliance: There was no industrial waste management plan letter of approval in the company.</p> <p><input checked="" type="checkbox"/> NC against ETI/Additional Elements <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI /Additional Elements requirement: Waste Management Regulation Official Gazette Date: 02.04.2015 Official Gazette Number: 29314 Obligations of the waste generator and waste owner ARTICLE 9 - (1) Waste producer; c) (Amended: OJ-23/3 / 2017-30016) It is obliged to prepare the waste management plan that it is obliged to prepare for the prevention and reduction of the wastes it produces and to submit it to the provincial directorate and obtain approval.</p> <p>Waste Management Regulation Official Gazette Date: 02.04.2015 Official Gazette Number: 29314 ğ) It is obliged to fill in the waste declaration form, including the information of the previous year, by using online applications prepared by the Ministry starting from January every year and until the end of March at the latest, to approve it, to print it and to keep a copy for five years.</p> <p>Additional Element 10B2.1: Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.</p> <p>Recommended corrective action: Industrial waste management plan letter of approval should be obtained from authorized body.</p>	<p>Objective evidence observed: Document review</p>

Observation: NONE	
<p>Description of observation: NONE</p> <p>Local law or ETI/additional elements requirement: NONE</p> <p>Comments: NONE</p>	<p>Objective evidence observed: N/A</p>

Good examples observed: NONE	
<p>Description of Good Example (GE): NONE</p>	<p>Objective Evidence Observed: N/A</p>

Other Findings Outside the Scope of the Code

NONE

Community Benefits

(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)

NONE

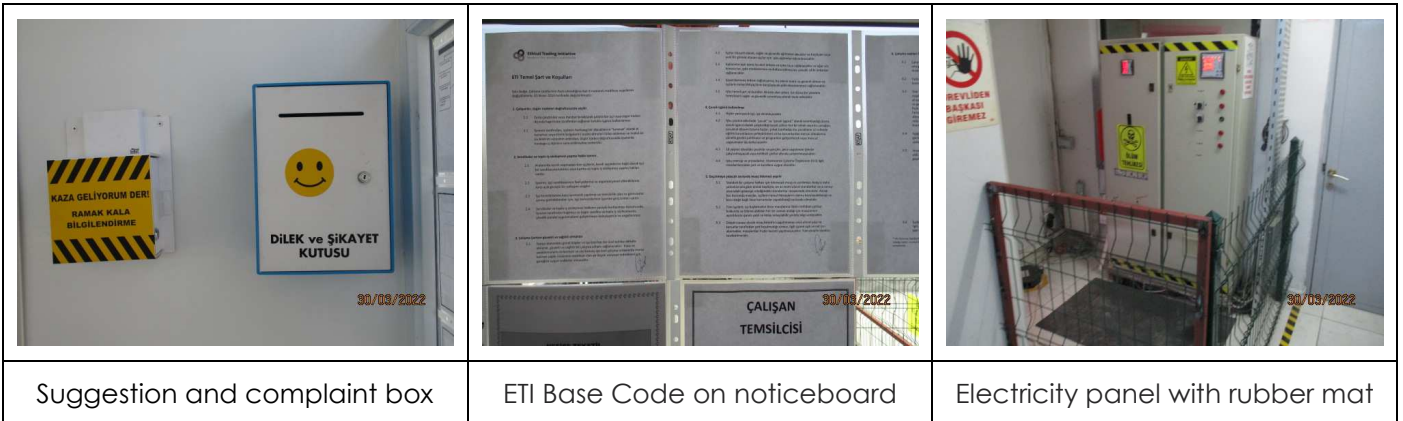
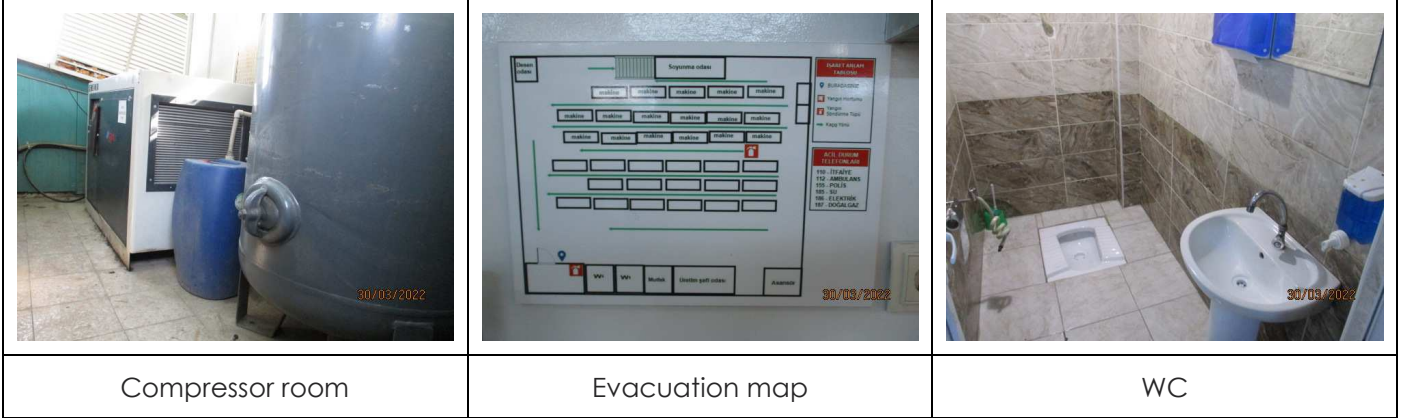
Appendix 1

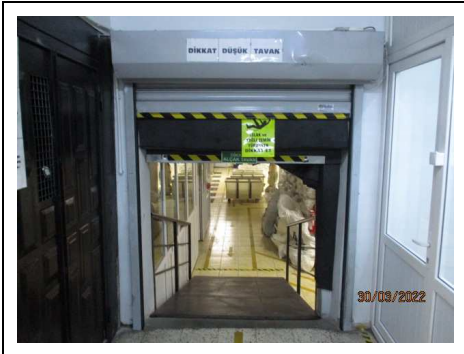


Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective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

Not Applicable please x

Photo Form

		
<p>External view of the company</p>	<p>Knitting section</p>	<p>Washing section</p>
		
<p>QC</p>	<p>Lunch hall</p>	<p>Emergency exit door</p>
		
<p>Fire extinguisher</p>	<p>Fire hose cabinet</p>	<p>Fire alarm button</p>



		
<p>NC photo 1: The height of the 2 emergency escape routes between the washing section and the knitting section of the company is less than 200 cm (with a low ceiling). There are also shuttered doors on 2 emergency escape routes.</p>	<p>NC photo 2: The height of the 2 emergency escape routes between the washing section and the knitting section of the company is less than 200 cm (with a low ceiling). There are also shuttered doors on 2 emergency escape routes.</p>	<p>NC photo 3: The height of the 2 emergency escape routes between the washing section and the knitting section of the company is less than 200 cm (with a low ceiling). There are also shuttered doors on 2 emergency escape routes.</p>



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

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

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

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

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

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

[http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d)

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

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

SMETA

SMETA Corrective Action Plan Report (CAPR)

Version 6.1



NEFİSE
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Audit Details

Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 417816897	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 417816952
Business name (Company name):	NEFISE TEKSTIL SAN VE TIC A.S		
Site name:	NEFISE TEKSTIL SAN VE TIC A.S		
Site address: <i>(Please include full address)</i>	TEKSTILKEN MAH. 47009 SK. NO:57-59-61-63 SAHINBEY / GAZIANTEP	Country:	TURKEY
Site contact and job title:	SEVIL TEMUR – PRODUCTION MANAGER		
Site phone:	00905412390609	Site e-mail:	s.temur@nefise.com.tr
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar <input type="checkbox"/> Business Ethics
Date of Audit:	30/03/2022		

Audit Company Name & Logo:

BUREAU VERITAS

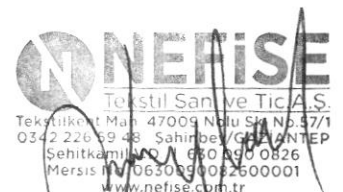


**BUREAU
VERITAS**

Report Owner (Payer):
NEFISE TEKSTIL SAN VE TIC A.S

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): This audit includes elements beyond the scope of a Social Compliance Audit as defined by the APSCA Competency Framework. The association of the auditor's APSCA number with this report is limited to those elements outlined in the APSCA Competency Framework. APSCA makes no representations with respect to the auditor's competency to professionally evaluate compliance with any other audit elements.

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

Lead auditor: ERHAN ERGUDER (RA 21703788)

Team auditor: -

Interviewers: ERHAN ERGUDER (RA 21703788)

Report writer: ERHAN ERGUDER (RA 21703788)

Report reviewer:

Date of declaration: 30/03/2022

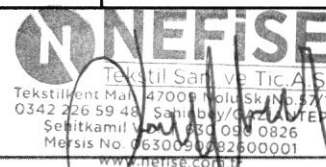
Note: The focus of this ethical audit is on the ETI Base Code and local law. The additional elements will not be audited in such depth or scope, but the audit process will still highlight any specific issues.

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

Audit Parameters

Audit Parameters			
A: Time in and time out	Day 1 Time in: 09:00 Day 1 Time out: 17:00	Day 2 Time in: - Day 2 Time out: -	Day 3 Time in: - Day 3 Time out: -
B: Number of auditor days used:	1 (1 auditor/denetci x 1 day/gun)		
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		
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced Window details: 21 March -1 April <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)	SEVIL TEMUR – PRODUCTION MANAGER		
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:	None		
J: Previous audit type:	None		
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 type="checkbox"/> No (N/A)
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No (N/A)
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 type="checkbox"/> No (N/A)



<p>D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)</p>	<p>There were 3 worker representatives onsite. 1 worker representative was included into the worker interview process.</p>
<p>E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)</p>	<p>There was no unionisation activity in the company.</p>

Guidance

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

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

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

Root cause (see column 4)

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

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

Next Steps:

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

Audit Company: BUREAU VERITAS

Report Reference: 10220471520

Date: 30/03/2022

NEFISE
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 Şirket Kamil V. 01 630 000 0826
 Mersis No: 083009002600001
www.nefise.com.tr

Sedexglobal.com

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>
0B. Yönetim Sistemleri ve Kodun Uygulanması / Management Systems and Code Implementation LL + Ek madde/Additional element 0B.2 (1)	YENI/NEW	Firmada işyeri açma ve çalışma ruhsatı mevcuttur. Ancak bütün faaliyet alanlarını (No: 59, 61 ve 63 kısımlarını) kapsamamaktadır. There was a Business License in the company. However Business License does not cover all activity areas (does not cover No:59, 61 and 63 areas)	<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:-	Tüm alanları kapsayan işyeri açma ve çalışma ruhsatı yetkili kurumdan temin edilmelidir. Business License that covers whole areas should be obtained from authorized body.	30 GÜN/DAYS	MASAUSTU İNCELEME / DESKTOP REVIEW	EVET/YES SEVİL TEMUR URETİM MUDURU / PRODUCTION MANAGER	-	-
3. Sağlık ve Güvenlik Koşulları / Safety and Hygienic Conditions (1) LL	YENI/NEW	Firmanın yapı kullanım izin belgesi mevcuttur. Ancak bütün faaliyet alanlarını kapsamamaktadır. (Sadece 785 m2 lik alanı kapsamaktadır) The company has an occupancy permit.	<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:-	Tüm alanları kapsayan yapı kullanım izin belgesi (iskan belgesi) yetkili kurumdan temin edilmelidir. Building usage permit (occupancy permit)	30 GÜN/DAYS	MASAUSTU İNCELEME / DESKTOP REVIEW	EVET/YES SEVİL TEMUR URETİM MUDURU / PRODUCTION MANAGER	-	-

		However, occupancy permit does not cover all activity areas (Occupancy permit covers only 785 sqm)		which covers whole area should be obtained from authorized body.					
3. Sağlık ve Güvenlik Koşulları / Safety and Hygienic Conditions (2) LL	YENI/NEW	Firmanın yıkama bölümü ve örme bölümü arasındaki 2 acil kaçış rotasının yüksekliği 200 cm'den azdır (alçak tavan vardır). Ayrıca 2 acil kaçış rotasında da kepenkli kapı bulunmaktadır. The height of the 2 emergency escape routes between the washing section and the knitting section of the company is less than 200 cm (with a low ceiling). There are also shuttered doors on 2 emergency escape routes.	<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: -	Tüm acil kaçış yolları her zaman tam ulaşılabilir olmalıdır. All emergency escape routes should be fully accessible at all times.	30 GÜN/DAYS	MASAÜSTÜ İNCELEME / DESKTOP REVIEW	EVET/YES SEVİL TEMUR URETİM MUDURU / PRODUCTION MANAGER	-	-
3. Sağlık ve Güvenlik Koşulları / Safety and Hygienic Conditions LL + ETI 3.2 (3)	YENI/NEW	Firmada ilkyardımcı çalışan yoktur. (Başvuru yapılmıştır) There was no first aid certificated workers in the company. (Application has been made)	<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: -	Her 20 kişiye 1 kişi düşecek şekilde sertifikalı ilkyardımcı bulundurunuz There should be at least one certificated first aider for every 20 employees.	30 GÜN/DAYS	MASAÜSTÜ İNCELEME / DESKTOP REVIEW	EVET/YES SEVİL TEMUR URETİM MUDURU / PRODUCTION MANAGER	-	-
3. Sağlık ve Güvenlik Koşulları / Safety and Hygienic Conditions	YENI/NEW	Firmanın itfaiye raporu görülememiştir.	<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: -	Tüm alanları kapsayan itfaiye raporu yetkili kurumdan temin edilmelidir.	30 GÜN/DAYS	MASAÜSTÜ İNCELEME / DESKTOP REVIEW	EVET/YES SEVİL TEMUR URETİM MUDURU /	-	-

LL (4)		Fire license was not seen in the company.		Fire License that covers whole areas should be obtained from authorized body.			PRODUCTION MANAGER		
3. Sağlık ve Güvenlik Koşulları / Safety and Hygienic Conditions (5) LL	YENI/NEW	Firmada iç ortam ölçümleri yapılmıştır. Ancak bazı uygunsuzluklar bulunmaktadır. (Yetersiz aydınlatma seviyeleri) It was noted that internal measurements were conducted in the company. However, some noncompliance was available. (Insufficient lighting levels)	<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: -	Uygun sonuçlu ölçümler sağlanmalıdır. Measurements with appropriate results should be provided.	30 GÜN/DAYS	MASAÜSTÜ İNCELEME / DESKTOP REVIEW	EVET/YES SEVİL TEMUR URETİM MUDURU / PRODUCTION MANAGER	-	-
10B2. Çevre 2-Pillar / Environment 2-Pillar (1) LL + Ek madde/Additional Element 10B2.1	YENI/NEW	Firmada çevre izni veya çevre izni kapsam dışı kararı yazısı bulunmamaktadır. There was no environmental permit or environmental permit exception decision letter in the company	<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: -	Çevre izni veya çevre izni kapsam dışı kararı yazısı yetkili kurumdan temin edilmelidir. Environmental permit or environmental permit exception decision letter should be obtained from authorized body	60 GÜN/DAYS	MASAÜSTÜ İNCELEME / DESKTOP REVIEW	EVET/YES SEVİL TEMUR URETİM MUDURU / PRODUCTION MANAGER	-	-
10B2. Çevre 2-Pillar / Environment 2-Pillar LL Additional Element 10B2.1 / Ek Madde 10B2.1 (2)	YENI/NEW	Firmada endüstriyel atık yönetim planı onay yazısı bulunmamaktadır. There was no industrial waste management plan letter of approval in the company.	<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: -	Endüstriyel atık yönetim planı onay yazısı yetkili kurumdan Industrial waste management plan letter of approval should be obtained from authorized body.	60 GÜN/DAYS	MASAÜSTÜ İNCELEME / DESKTOP REVIEW	EVET/YES SEVİL TEMUR URETİM MUDURU / PRODUCTION MANAGER	-	-

Corrective Action Plan – Observations

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

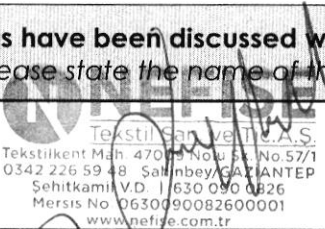

Good examples

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
5. Yaşam Ücreti ve Yan Haklar / Living Wages and Benefits #1	Çalışanlara ücretsiz yemek sağlanmaktadır. Meal is provided free of charge to employees.	Çalışan görüşmeleri, yönetim beyanı, döküman inceleme / Worker interviews, management declaration, document review
5. Yaşam Ücreti ve Yan Haklar / Living Wages and Benefits #2	Gece vrdiyasında çalışanlara ücretsiz servis sağlanmaktadır. Transportation is provided free of charge to ight shift employees.	Çalışan görüşmeleri, yönetim beyanı, döküman inceleme / Worker interviews, management declaration, document review



Confirmation

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.

A: Site Representative Signature:	SEVIL TEMUR	 NEFİSE Tekstil San ve Tic. A.Ş. Tekstilkent Mah. 47099 Nolu Sk. No.57/1 0342 226 59 48 Sahinbey/GAZİANTEP Sehitkamil V.D. 630 090 0826 Mersis No: 0630090082600001 www.nefise.com.tr	Title: PRODUCTION MANAGER / URETİM MUDURU Date: 30.03.2022
B: Auditor Signature:	ERHAN ERGUDER		Title: AUDITOR / DENETÇİ Date: 30.03.2022
C: Please indicate below if you, the site management, dispute any of the findings. No need to complete D-E, if no disputes.			
D: I dispute the following numbered non-compliances: None/Yoktur			
E: Signed: (If any entry in box D, please complete a signature on this line)	-	-	-
F: Any other site Comments: None/Yoktur			

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.

NEFISE
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 Tekstil Kent Mah. 47000. Bolu No. 37/1
 0342 226 59 48 SAĞMAD/GEZİANTEP
 Şehitkamil V.D. 630 09 0826
 Mersis No. 063009008200001
 www.nefise.com.tr



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

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

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

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

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

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

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

[Click here for Auditors:](#)

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

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Mersis No: 0650090082600001
www.nefise.com.tr




SMETA Corrective Action Plan Report (CAPR)

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 417816897	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 417816952
Business name (Company name):	NEFISE TEKSTIL SAN VE TIC A.S		
Site name:	NEFISE TEKSTIL SAN VE TIC A.S		
Site address: <i>(Please include full address)</i>	TEKSTILKEN MAH. 47009 SK. NO:57-59-61-63 SAHINBEY / GAZIANTEP	Country:	TURKEY
Site contact and job title:	SEVIL TEMUR – PRODUCTION MANAGER		
Site phone:	00905412390609	Site e-mail:	s.temur@nefise.com.tr
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar <input type="checkbox"/> Business Ethics
Date of Audit:	30/03/2022		

Audit Company Name & Logo: BUREAU VERITAS 	Report Owner (Payer): DALICI GRUP DANISMANLIK TEKS SAN 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): This audit includes elements beyond the scope of a Social Compliance Audit as defined by the APSCA Competency Framework. The association of the auditor's APSCA number with this report is limited to those elements outlined in the APSCA Competency Framework. APSCA makes no representations with respect to the auditor's competency to professionally evaluate compliance with any other audit elements.

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

Lead auditor: ERHAN ERGUDER (RA 21703788)

Team auditor: -

Interviewers: ERHAN ERGUDER (RA 21703788)

Report writer: ERHAN ERGUDER (RA 21703788)

Report reviewer: Mary Liu

Date of declaration: 30/03/2022

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

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

Audit Parameters

Audit Parameters			
A: Time in and time out	Day 1 Time in: 09:00 Day 1 Time out: 17:00	Day 2 Time in: - Day 2 Time out: -	Day 3 Time in: - Day 3 Time out: -
B: Number of auditor days used:	1 (1 auditor/denetci x 1 day/gun)		
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		
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced Window details: 21 March -1 April <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)	SEVIL TEMUR – PRODUCTION MANAGER		
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:	None		
J: Previous audit type:	None		
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 type="checkbox"/> No (N/A)
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No (N/A)
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 type="checkbox"/> No (N/A)

D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	There were 3 worker representatives onsite. 1 worker representative was included into the worker interview process.
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	There was no unionisation activity in the company.

Guidance

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

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

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

Root cause (see column 4)

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

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

Next Steps:

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

Corrective Action Plan

Corrective Action Plan – non-compliances									
Non-Compliance Number <i>The reference number of the non-compliance from the Audit Report, for example, Discrimination No.7</i>	New or Carried Over <i>Is this a new non-compliance identified at the follow-up or one carried over (C) that is still outstanding</i>	Details of Non-Compliance <i>Details of Non-Compliance</i>	Root cause <i>(completed by the site)</i>	Preventative and Corrective Actions <i>Details of actions to be taken to clear non-compliance, and the system change to prevent re-occurrence (agreed between site and auditor)</i>	Timescale <i>(Immediate, 30, 60, 90, 180, 365)</i>	Verification Method <i>Desktop / Follow-Up [D/F]</i>	Agreed by Management and Name of Responsible Person: <i>Note if management agree to the non-compliance, and document name of responsible person</i>	Verification Evidence and Comments <i>Details on corrective action evidence</i>	Status <i>Open/Closed or comment</i>
0B. Yönetim Sistemleri ve Kodun Uygulanması / Management Systems and Code Implementation LL + Ek madde/Additional element 0B.2 (1)	YENI/NEW	Firmada işyeri açma ve çalışma ruhsatı mevcuttur. Ancak bütün faaliyet alanlarını (No: 59, 61 ve 63 kısımlarını) kapsamamaktadır. There was a Business License in the company. However Business License does not cover all activity areas (does not cover No:59, 61 and 63 areas)	<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:-	Tüm alanları kapsayan işyeri açma ve çalışma ruhsatı yetkili kurumdan temin edilmelidir. Business License that covers whole areas should be obtained from authorized body.	30 GÜN/DAYS	MASAUSTU İNCELEME / DESKTOP REVIEW	EVET/YES SEVİL TEMUR URETİM MUDURU / PRODUCTION MANAGER	-	-
3. Sağlık ve Güvenlik Koşulları / Safety and Hygienic Conditions (1) LL	YENI/NEW	Firmanın yapı kullanım izin belgesi mevcuttur. Ancak bütün faaliyet alanlarını kapsamamaktadır. (Sadece 785 m2 lik alanı kapsamaktadır) The company has an occupancy permit. However, occupancy	<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: -	Tüm alanları kapsayan yapı kullanım izin belgesi (iskan belgesi) yetkili kurumdan temin edilmelidir. Building usage permit (occupancy permit) which covers whole	30 GÜN/DAYS	MASAUSTU İNCELEME / DESKTOP REVIEW	EVET/YES SEVİL TEMUR URETİM MUDURU / PRODUCTION MANAGER	-	-

		permit does not cover all activity areas (Occupancy permit covers only 785 sqm)		area should be obtained from authorized body.					
3. Sağlık ve Güvenlik Koşulları / Safety and Hygienic Conditions (2) LL	YENI/NEW	Firmanın yıkama bölümü ve örme bölümü arasındaki 2 acil kaçış rotasının yüksekliği 200 cm'den azdır (alçak tavan vardır). Ayrıca 2 acil kaçış rotasında da kepenkli kapı bulunmaktadır. The height of the 2 emergency escape routes between the washing section and the knitting section of the company is less than 200 cm (with a low ceiling). There are also shuttered doors on 2 emergency escape routes.	<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: -	Tüm acil kaçış yolları her zaman tam ulaşılabilir olmalıdır. All emergency escape routes should be fully accessible at all times.	30 GÜN/DAYS	MASAÜSTÜ İNCELEME / DESKTOP REVIEW	EVET/YES SEVİL TEMUR URETİM MUDURU / PRODUCTION MANAGER	-	-
3. Sağlık ve Güvenlik Koşulları / Safety and Hygienic Conditions LL + ETI 3.2 (3)	YENI/NEW	Firmada ilkyardımcı çalışan yoktur. (Başvuru yapılmıştır) There was no first aid certificated workers in the company. (Application has been made)	<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: -	Her 20 kişiye 1 kişi düşecek şekilde sertifikalı ilkyardımcı bulundurunuz There should be at least one certificated first aider for every 20 employees.	30 GÜN/DAYS	MASAÜSTÜ İNCELEME / DESKTOP REVIEW	EVET/YES SEVİL TEMUR URETİM MUDURU / PRODUCTION MANAGER	-	-
3. Sağlık ve Güvenlik Koşulları / Safety and Hygienic Conditions LL	YENI/NEW	Firmanın itfaiye raporu görülememiştir. Fire license was not seen in the company.	<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: -	Tüm alanları kapsayan itfaiye raporu yetkili kurumdan temin edilmelidir.	30 GÜN/DAYS	MASAÜSTÜ İNCELEME / DESKTOP REVIEW	EVET/YES SEVİL TEMUR URETİM MUDURU /	-	-

(4)				Fire License that covers whole areas should be obtained from authorized body.			PRODUCTION MANAGER		
3. Sağlık ve Güvenlik Koşulları / Safety and Hygienic Conditions (5) LL	YENI/NEW	Firmada iç ortam ölçümleri yapılmıştır. Ancak bazı uygunsuzluklar bulunmaktadır. (Yetersiz aydınlatma seviyeleri) It was noted that internal measurements were conducted in the company. However, some noncompliance was available. (Insufficient lighting levels)	<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: -	Uygun sonuçlu ölçümler sağlanmalıdır. Measurements with appropriate results should be provided.	30 GÜN/DAYS	MASAÜSTÜ İNCELEME / DESKTOP REVIEW	EVET/YES SEVİL TEMUR URETİM MUDURU / PRODUCTION MANAGER	-	-
10B2. Çevre 2-Pillar / Environment 2-Pillar (1) LL + Ek madde/Additional Element 10B2.1	YENI/NEW	Firmada çevre izni veya çevre izni kapsam dışı kararı yazısı bulunmamaktadır. There was no environmental permit or environmental permit exception decision letter in the company	<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: -	Çevre izni veya çevre izni kapsam dışı kararı yazısı yetkili kurumdan temin edilmelidir. Environmental permit or environmental permit exception decision letter should be obtained from authorized body	60 GÜN/DAYS	MASAÜSTÜ İNCELEME / DESKTOP REVIEW	EVET/YES SEVİL TEMUR URETİM MUDURU / PRODUCTION MANAGER	-	-
10B2. Çevre 2-Pillar / Environment 2-Pillar LL Additional Element 10B2.1 / Ek Madde 10B2.1 (2)	YENI/NEW	Firmada endüstriyel atık yönetim planı onay yazısı bulunmamaktadır. There was no industrial waste management plan letter of approval in the company.	<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: -	Endüstriyel atık yönetim planı onay yazısı yetkili kurumdan Industrial waste management plan letter of approval should be obtained from authorized body.	60 GÜN/DAYS	MASAÜSTÜ İNCELEME / DESKTOP REVIEW	EVET/YES SEVİL TEMUR URETİM MUDURU / PRODUCTION MANAGER	-	-

Corrective Action Plan – Observations

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

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
5. Yaşam Ücreti ve Yan Haklar / Living Wages and Benefits #1	Çalışanlara ücretsiz yemek sağlanmaktadır. Meal is provided free of charge to employees.	Çalışan görüşmeleri, yönetim beyanı, döküman inceleme / Worker interviews, management declaration, document review
5. Yaşam Ücreti ve Yan Haklar / Living Wages and Benefits #2	Gece vrdiyasında çalışanlara ücretsiz servis sağlanmaktadır. Transportation is provided free of charge to night shift employees.	Çalışan görüşmeleri, yönetim beyanı, döküman inceleme / Worker interviews, management declaration, document review

Confirmation

<p>Please sign this document confirming that the above findings have been discussed with and understood by you: (site management) <i>If actual signatures are not possible in electronic versions, please state the name of the signatory in applicable boxes, as indicating the signature.</i></p>		
A: Site Representative Signature:	SEVIL TEMUR	Title: PRODUCTION MANAGER / URETIM MUDURU Date: 30.03.2022
B: Auditor Signature:	ERHAN ERGUDER	Title: AUDITOR / DENETCI Date: 30.03.2022
C: Please indicate below if you, the site management, dispute any of the findings. No need to complete D-E, if no disputes.		
D: I dispute the following numbered non-compliances: None/Yoktur		
E: Signed: (If <u>any</u> entry in box D, please complete a signature on this line)	-	-
F: Any other site Comments: None/Yoktur		

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.



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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

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