



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC1013455	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS1079831	
Business name (Company name):	OZANTEKS Tekstil San ve Tic AS			
Site name:	OZANTEKS TEKSTIL SANAYI VE TICARET ANONIM SIRKETI			
Site address:	BOZBURUN MAHALLESİ 7042 SOKAK NO:6 DENİZLİ 20085 TR	Country:	TR	
Site contact and job title:	SERAP ÖZTÜRK / SUSTAINABILITY RESPONSIBLE			
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar	<input type="checkbox"/> Business Ethics
Date of Audit:	2023-02-01			

Audit Company Name:
Eurofins EMEA

Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

Audit Content:

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

SMETA Declaration

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

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

Auditor Team			
Lead Auditor:	Ari Kolanciyan	APSCA Number:	21701535
Additional Auditors:			
Date of declaration:	2023-02-02		

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

Site Representation	
Full Name:	SERAP ÖZTÜRK
Title:	SUSTAINABILITY RESPONSIBLE
Date of declaration:	2023-02-02
Comments:	None

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
<u>0A - Universal rights covering UNGP</u>			0	0	0	
<u>0B - Management systems and code implementation</u>	0.B.4	§1	1	0	0	NC - ZAF600012621
<u>1 - Freely chosen employment</u>			0	0	0	
<u>2 - Freedom of association and right to collective bargaining are respected</u>			0	0	0	
<u>3 - Working conditions are safe and hygienic</u>			0	1	0	Obs - ZAF600012620
<u>4 - Child labour shall not be used</u>			0	0	0	
<u>5 - Living wages are paid</u>	5.1	§2	1	0	1	NC - ZAF600012623 GE - ZAF600012622
<u>6 - Working hours are not excessive</u>			0	0	0	
<u>7 - No discrimination is practiced</u>			0	0	0	
<u>8 - Regular employment is provided</u>			0	0	0	
<u>8A - Subcontracting and homeworking</u>			0	0	0	
<u>9 - No harsh or inhumane treatment is allowed</u>			0	0	0	
<u>10A - Entitlement to work and immigration</u>			0	0	0	
<u>10B2 - Environment 2-pillar</u>			0	0	0	
<u>10B4 - Environment 4-pillar</u>			0	0	0	
<u>10C - Business ethics 4-pillar</u>			0	0	0	

Local Law Issues

Issue	Description
§1	Regulation for facility opening and operating permit (10/8/2005), II. Section Art 6 (Changed first clause: 19/3/2007 – 2007/11882 K.) – It is not allowed that the facility are not opened and operated without “Opening and Operating Permit” that is taken from local authorities properly
§2	TURKISH LAW OF OBLIGATIONS ARTICLE 408- If the employer prevents the performance of the performance by fault or defaults in accepting the performance, he is obliged to pay the wage to the worker and cannot ask the worker to fulfill this act later. However, the expenses that the worker avoids due to this obstacle and the benefits he earns by doing another job or knowingly avoids from earning are deducted from his wage.

Site Details

Site Details		
Company Name	OZANTEKS Tekstil San ve Tic AS	
Site Name	OZANTEKS TEKSTIL SANAYI VE TICARET ANONIM SIRKETI	
GPS location (if available)	GPS Address:	BOZBURUN MAH. 7042 SOK. NO:6 20020 MERKEZEFENDİ - DENIZLI
	Coordinates:	N37.82782786194446, E29.061334552863787
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Business license number and date: 13 and 27.01.2011	
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	The company is producer of home-tex and seamless lingerie. There were weaving, dyeing, printing, cutting, sewing, QC and packing for home-tex also seamless knitting process, dyeing, sewing, QC and packing for lingerie,	
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	The facility established in 1973 and moved to current location in 1995, there were mainly 6 buildings for management and production, also there were also additional building for treatment plant, boiler room, waste storage, security room coal storage etc., All the closed area is about 100.000 sqm including mezzanine floors and additional areas. The total floor area of the buildings is about 74000 sqm.	

Structure and number of buildings	Building Name:		1-Management and production
	Floor	Description	Remark
	1	Management office	None
	Mezzanine	Cutting, sewing, QC and packing of towel and bathrobe	None
	Building Name:		2-Weaving1
	Floor	Description	Remark
	1	Weaving	None
	Mezzanine floor	Lunch hall	None
	Building Name:		3- Weaving2
	Floor	Description	Remark
	1	Weaving	None
	Building Name:		4-Warehouse
	Floor	Description	Remark
	-1	Product warehouse	None
	0	Yarn warehouse	None
	1	Yarn warehouse	None
	Building Name:		5-Dyeing and printing
	Floor	Description	Remark
	1	Dyeing and continuous printing	None
	Building Name:		6
Floor	Description	Remark	
0	Seamless knitting	None	
1	Sewing, QC, and packing of lingerie, lunch hall	None	
Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No crack was observed		
Does the site have a structural engineer evaluation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The building usage permits were available for all also earthquake resident report was available		
Site function	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack house <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-contractor		

Months of peak season	June to August
Process overview	The company is producer of home-tex and seamless lingerie. there were weaving, dyeing, printing, cutting, sewing, QC and packing for home-tex also seamless knitting process, dyeing, sewing, QC and packing for lingerie.
What form of worker representation is there on site?	<input type="checkbox"/> Union <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other <input type="checkbox"/> None
Please give details:	There were freely elected worker representation system.
Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any on site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Were all site provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There was no accommodation building

Audit Parameters				
Time in and time out	Day 1		Day 2	
	In	09:30	In	08:30
	Out	18:00	Out	17:00
Audit type:	Full initial			
Was the audit announced?	UNANNOUNCED			
Was the Sedex SAQ available for review?	Yes			
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No			
Who signed and agreed CAPR	SERAP ÖZTÜRK / SUSTAINABILITY RESPONSIBLE			
Is further information available	No			

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
<i>Reason for absence at the opening meeting</i>	There was no trade union		
<i>Reason for absence during the audit</i>	There was no trade union		
<i>Reason for absence at the closing meeting</i>	There was no trade union		

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	456	0	15	0	0	0	0	471
Worker numbers – female	676	0	12	0	0	0	0	688
Total	1132	0	27	0	0	0	0	1159
Number of Workers interviewed – male	25	0	1	0	0	0	0	26
Number of Workers interviewed – female	25	0	1	0	0	0	0	26
Total – interviewed sample size	50	0	2	0	0	0	0	52

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

Worker Interview Summary	
Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Number of group interviews:	8 groups of 4 workers
Number of individual interviews:	Male: 10 Female: 10
All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favorable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
What was the most common worker complaint?	Employees complained that they were underpaid for days not worked due to lack of work.
What did the workers like the most about working at this site?	They are happy about being part of the Ozanteks because it is a reliable company
Any additional comment(s) regarding interviews:	Totally 32 workers interviewed in 8 group. No need to add any special comment.
Attitude of workers to hours worked:	Workers are happy about working shift basis, other are happy working 5 day only.
Is there any worker survey information available?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The worker survey was done in June 2022 to measure workers satisfaction.

Attitude of workers:

Workers did not raise any negative feedback. Based on the workers' interviews, it was noted that all interviewed workers said they are satisfied with the compensation of the facility. There was no negative information coming from them.

Attitude of worker's committee/union reps:

Worker representative was cooperative and supportive during the audit. Worker communication system were support by the facility management. Worker representative was aware of her duty, her attitude is favorable, no negative feedback was forwarded.

Attitude of managers:

The facility management showed a cooperative and supportive attitude during the audit. Auditors were allowed to conduct the facility tour at all places in the facility. All document requested were provided on time. At the closing meeting, CAP was accepted by the facility management

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

0A: Compliance Requirements

- 0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.
- 0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights
- 0.A.3 Businesses shall identify their stakeholders and salient issues.
- 0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.
- 0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.
- 0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter. Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

Current Systems and Evidence Examined

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

Current Systems:

The facility has social compliance policy and procedures that includes supplier management. Social compliance responsible is authorized. All employees can communicate any issue directly. The facility has a detailed CSR policy which covers human rights impacts and issues. With the regular meetings they provide remediation plans if necessary.

Evidence examined:

- Social compliance policy and related procedures
- Authorization letter of social compliance responsible
- Grievance Mechanism Feedback's
- Management Interview
- Employee Interviews

Any other comments:

None

Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has a detailed social compliance policy that includes human rights.
Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has a detailed Health & Safety procedure, and this procedure is explained in Health and Safety training's to employees. Besides that, policies were provided in worker manuals and contracts.
Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Sustainability manager also responsible for human rights.

Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has suggestion box for anonymous communication.
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has detailed privacy procedures for worker's information such as personnel file, labor contract. Also, the feedback's getting from suggestion boxes are evaluated by the management in a confidential way.
Measuring Workplace Impact	
Annual worker turnover(Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	Last year 22% This year 2%
Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	7%
Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	Last year 2% This year 1%
Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month)	2%
Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Accident records were kept by OHS expert with root cause analysis
Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year 3% This year 1%

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)	1%	
Lost day work cases per 100 workers((Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	Last year	37%
	This year	1%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month	15%
	12 month	21%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month	0%
	12 month	0%

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

0B: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

The facility has disciplinary procedures and work rules which were posted onsite also a copy of it were given to workers.
 All social compliance issues are managed and monitored internally.
 The employees have information regarding social compliance, social and legal rights.
 The facility management has already posted ETI Base code on notice boards.
 The facility has its own documented social policy that covers all issues mentioned in ETI Base Code.
 Overall responsibility for meeting the standards is taken by system manager.
 ETI Base code was provided to all suppliers. And they were informed regarding to requirements.

Evidence examined:

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

Any other comments:

None

Management Systems

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

Yes No

Please give details:

Site has not been subject to fines/ prosecutions.

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

Yes No

Please give details:

Policies and procedures about reduce the risk of forced labor, child labor, discrimination and harassment & abuse are available.

<p>If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>Policies exist for all areas (Forced labor, Health and Safety, Wages, Working Hours, and No harsh treatment, Environment, Business Ethics, Child Labor, Recruitment, Discrimination and Sub- contracting.). These are communicated to workers via poster.</p> <p>Through documents review and workers' interviews, policy on 'No harsh treatment and Environment' was fully in compliance with the code. In addition, workers stated that no forced labor, no child labor was found in the facility (interview and document checks), there were both female and male among management/supervisors.</p>
<p>Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>There was evidence related to social compliance training was given to workers about social compliance issues. Training records were reviewed. All employees were informed regarding social compliance policies at the beginning of recruitment and periodically.</p>
<p>If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Training records were reviewed. All employees were informed regarding social compliance policies at the beginning of recruitment and periodically.</p>
<p>Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>ISO14001:2015 valid 26.03.2023, ISO9001:2015 valid 19.09.2023</p>
<p>Is there a Human Resources manager/department?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>There was a HR department with 1 HR manager and 5 staffs</p>
<p>Is there a senior person /manager responsible for implementation of the code?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>There was a sustainability system responsible, also she is appointed to implement the code.</p>
<p>Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has detailed privacy procedures for worker's information such as personnel file, labour contract.</p>
<p>Is there an effective procedure to ensure confidential information is kept confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>All worker information is kept on their personnel files. Personal files are kept in a locked cabinet in HR office.</p>
<p>Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Health and Safety Risk assessment including policy and procedure effectiveness was conducted.</p>

<p>Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: The facility performs a corrective action plan for the findings that are addressed in risk assessment.</p>
<p>Does the facility have a policy/code which require labour standards of its own suppliers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: The facility's code includes labour standards of its own suppliers.</p>
<p>Land Rights</p>	
<p>Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: Building usage permits cover all the buildings however there were missing area in business license.</p>
<p>Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: The facility has business license and other permits but the last business license does not cover all areas, refer finding.</p>
<p>Does the site have a written policy and procedures specific to land rights?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: Not applicable due to no legal requirement in Turkey.</p>
<p>Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: The company is owner of the site.</p>
<p>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 checked="" type="checkbox"/> No</p> <p>Please give details: Not applicable. There is no land acquisition. In case of a land acquisition, the facility has to apply to the municipality and fulfill the obligations regarding environmental impact assessment, construction permit etc.</p>
<p>Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: No illegal appropriation of land for facility building or expansion of footprint.</p>

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Reference	ZAF600012621	
Clause	0B - Management Systems and code Implementation	
Issue Title	34 - Site is operating without all required in-date licences and permits (e.g. business / factory licence has expired)	
Subcategory	Site's licenses & Certifications	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Regulation for facility opening and operating permit (10/8/2005), II. Section Art 6 (Changed first clause: 19/3/2007 – 2007/11882 K.) – It is not allowed that the facility are not opened and operated without “Opening and Operating Permit” that is taken from local authorities properly	
ETI code	0.B.4 - Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with.	
Explanation to the non compliance	Fabrikanın 27.01.2011 tarihli işyeri açma ve çalıştırma ruhsatı mevcuttur, ruhsat numarası 13 dür, ancak baskı boya bölümünün son inşa edilen 4425 m2 lik (yapı kullanma izin tarihi 10.05.2022)kısmı ruhsat kapsamında değildir. The company has business license which was dated on 27.01.2011 and with number 13. However the last constructed part(4425 sqm) of the printing and dying building (building usage permit date 10.05.2022) were not included in business license scope.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	İşyeri açma ve çalıştırma ruhsatı tüm alanları kapsamalıdır. The building usage and operating permit should be cover all areas.	

1 - Freely chosen Employment
[Summary of Findings]

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

Current Systems and Evidence Examined

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

Current Systems:

The factory has a policy against forced labour and the policy was reviewed by auditor.
 There was a non-formalized application procedure which states that workers must present their ID's.
 There was no forced or bonded labour at the company.
 Movement of employees at the facility were not limited.
 Employees have free access to toilets and drinkable water.
 Employment was freely chosen.
 Workers were free to leave and were not required to lodge deposits or ID papers with their employers. The notice period is defined and applied as 2-8 weeks as per local law.
 The above was confirmed during management and workers’ interviews.

Evidence examined:

Policy documents
 Workers’ interviews
 Personnel files and pay-slips
 Disciplinary records
 Labor contracts

Any other comments:

None

Is there any evidence of retention of original documents, e.g. passports/ID’ (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any restrictions on workers’ freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Workers are free to leave their jobs at any time.
If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a ‘modern day slavery statement?’	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details: No part of the business is done in UK.

<p>Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>Employees are free to leave their workplace without any restriction at the end of the workday.</p>
<p>Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p> <p>Please give details:</p> <p>The facility has a detailed recruitment and hiring policy which is in accordance with laws. They always implement the all necessary requirements. Besides that, forced labour is prohibited in the facility. During the interviews, no forced labour issue is identified.</p>
<p>Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has a detailed procedure regarding this issue which includes reducing the risk of forced/ trafficked labour at the facility.</p>

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

2: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

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

Evidence examined:

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

Any other comments:

None

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	<input type="checkbox"/> Union <input type="checkbox"/> Other	<input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> None
Other details:	There were a freely elected worker representation system, open door policy and suggestion boxes.	
Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Employees declared that they can go directly to the management for their suggestions whenever they want. In addition to this. Suggestion boxes are placed in several places of the company.	
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There was a room available for the workers committee to meet and the members were allowed for a meeting.
Name of union and union representative, if applicable:	No union in the facility.
Is there evidence of free elections?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	There were freely elected worker representatives
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The last election was done on 25.10.2022 and totally 36 workers were selected from each section. Interviewed workers knew who are them.
Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date of last election:	2022-10-25
Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, please state how many:	2.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	The meeting between worker representative and management was performed periodically. Grievances of employees were discussed. The box is opened 2 at each month and meetings conducted once at each 3 months. The last meeting was performed on 11.01.2023
Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

3: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

The company has full time job site doctor and H&S Specialist.
 The periodical inspections of pressurized utensils and lifting equipment were performed regularly.
 The electrical installation and grounding test were performed annually.
 There were 91 first aid certificated employees in the company.
 The occupational health and safety training was given for each.
 The last drinking water analysis was performed on 26.10.2022
 Job related accidents were recorded.
 The last firefighting and evacuation training and drill were performed on 09.01.2023
 Hygiene training certificates were obtained for the employees who contact with food.
 Emergency preparedness plan was conducted.
 Risk analysis was conducted on 01.02.2022
 Indoor measurements (noise, illumination, dust, thermal comfort) were conducted.

Evidence examined:

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

Any other comments:

None

Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has Health & Safety Procedures and these procedures have been shared with employees via training.
Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The policies are communicated to the workers via the notice board.

<p>Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>There were building usage permit for the all buildings.</p>
<p>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</p> <p>Please give details:</p> <p>Visitor's badges had H&S information on them and the visitor was requested to read it. And also there was a warning signs at the entrance door of the production area.</p>
<p>Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>There was infirmary at the facility and also there were sufficient first aid certificated employees and adequate first aid kits in each production area and they were well stocked.</p>
<p>Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The first aid boxes are placed at the production area. Besides that, there was full time doctor and there were 91 first aiders, and they had been trained.</p>
<p>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</p> <p>Please give details:</p> <p>The company works with professional transportation company. Legal permits were available for the drivers and vehicles.</p>
<p>Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>N/A - There is no living space.</p>
<p>Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Risk assessment was performed on 01.02.2022 and reviewed periodically by an full time OHS expert. All risks were evaluated.</p>
<p>Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has all environmental licences.</p>
<p>Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>No banned chemical is used by the facility.</p>

Observation		Evidence
[Back to findings summary]		
Observation		
Reference	ZAF600012620	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	303 - No / inadequate assessment of temperature levels	
Subcategory	Worker Health	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Explanation to the observation	Firmada son iç ortam ölçümü kış ayında yapılmıştır (22.01.2019), M&S gerekliliğine göre yaz aylarında iç ortam termal konfor ölçümü yapılmamıştır. The last indoor temperature measurement was done in winter (on 22.01.2019), no indoor temperature measurement was not done during summer as per M&S requirements.	
Actions	İç ortam ölçümü hem yaz, hem de kış aylarında yapılmalıdır. Indoor temperature measurement should be done in summer and winter also.	

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

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

Current Systems and Evidence Examined

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

Current Systems:

There was no young worker in the facility.
 The age control of applicants is performed during recruitment process by accountant.
 The facility has a detailed child labour remediation policy and procedure. Encouragement of the child and his/her family to education is detailed in the procedure.
 All the relevant policies and procedures in line with the local and international laws and requirements.

Evidence examined:

ID Copies of employees
 Personnel file
 Management and employees' interviews

Any other comments:

None

Legal age of employment:	15
Age of youngest worker found:	19
Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Percentage of under 18's at this site (of total workers)	0%
Are workers under 18 subject to hazardous work assignments?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There was no juvenile worker.

5 - Living Wages are Paid
[Summary of Findings]

5: Compliance Requirements

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
 5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
 5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

Current Systems and Evidence Examined

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

Current Systems:

There were no employees paid under the legal minimum wage.
 Annual leaves are used by the employees properly.
 Wages are paid on 10th day of each month by bank.
 Benefits such as social insurance, annual leave, and child-bearing leave are provided to employees.
 All disciplinary measures were recorded.

Evidence examined:

52 employees are interviewed and 52 workers records were reviewed
 Social insurance records
 Employees' & management interviews
 Labor contracts

Any other comments:

None

Summary Information

Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 11.0 Per Week: 45.0 Per Month: null	Actual Per Day: 9.0 Per Week: 45.0 Per Month: 180.0	NO
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 11.0 Per Week: null Per Month: null	Actual Per Day: 7.0 Per Week: 7.0 Per Month: 14.0	NO
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: 5500.35	Actual Per Day: 200.0 Per Week: 1200.0 Per Month: 6000.0	NO
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: null	Actual Per Day: 300.0 Per Week: 0.0 Per Month: 0.0	NO

Wages Analysis:	
Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	52 employees' December 2022 (last paid), October 2022 and June 2022 (peak month) time and payment records were reviewed.
Are there different legal minimum wage grades? If Yes, please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details:
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	6000 TL / month
Please indicate the breakdown of workforce per earnings	0% of workforce earning under minimum wage 0% of workforce earning minimum wage 100% of workforce earning above minimum wage
Bonus Scheme found: Please specify details:	Bonus Scheme found:100 TL / month bonus were paid according to the workers productivity. Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.
What deductions are required by law e.g. social insurance? Please state all types:	Social insurance and taxes
Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Please list all deductions that have been made.	Social insurance and taxes
Please list all deductions that have not been made.	None
Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All working hours were recorded and tracked via card activated system
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation <input type="checkbox"/> Other – please give details:
Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="checked" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility reviews wages annually according to country's minimum wage requirements.
Are workers paid in a timely manner in line with local law?	<input checked="checked" type="checkbox"/> Yes <input type="checkbox"/> No
Is there evidence that equal rates are being paid for equal work:	<input checked="checked" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: It was confirmed through employees' and management interviews and documents review; equal rates are paid for equal work.
How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="checked" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Reference	ZAF600012623	
Clause	5 - Living Wages are Paid	
Issue Title	442 - Workers are not paid during stoppage of production in line with local law	
Subcategory	Payment of Wages	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input checked="" type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	TURKISH LAW OF OBLIGATIONS ARTICLE 408- If the employer prevents the performance of the performance by fault or defaults in accepting the performance, he is obliged to pay the wage to the worker and cannot ask the worker to fulfill this act later. However, the expenses that the worker avoids due to this obstacle and the benefits he earns by doing another job or knowingly avoids from earning are deducted from his wage.	
ETI code	5.1 - Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.	
Explanation to the non compliance	Örneklenen 52 çalışandan 13ünün(vardiyalı çalışan dokuma, boyahane çalışanları) örneklenen aylardan 2022 Ekim ve 2022 Aralık aylarında iş olmaması gerekçesiyle Cumartesi günleri(3-5 gün /ay) çalışma yapmadıkları ve bu günler için ücret alamadıkları ve SGK gün bildirimi yapılmadığı(ücretsiz izin kullandıkları) tespit edilmiştir. It was noted that 13 out of 52 sampled workers (shift basis workers at weaving and dyeing section) did not perform production practice on Saturday's in the sampled months October 2022 and December 2022(3-5 days/month) due to lack of work load so they did not earned salary and no social security day registrations for these days(they used un paid leave).	
Follow up method	<input checked="" type="checkbox"/> Follow up audit <input type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	İş olmaması sebebiyle çalışılmayan günler için yasalara	

	uygun eylemler yapın. Take legal action for days not worked due to lack of work.	
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Good Example	Evidence																
<p>[Back to findings summary]</p> <table border="1" style="width: 100%;"> <thead> <tr> <th colspan="2">Good Example</th> </tr> </thead> <tbody> <tr> <td>Reference</td> <td>ZAF600012622</td> </tr> <tr> <td>Clause</td> <td>5 - Living Wages are Paid</td> </tr> <tr> <td>Issue Title</td> <td>429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport</td> </tr> <tr> <td>Subcategory</td> <td>Benefits & Insurance</td> </tr> <tr> <td>New or carried over?</td> <td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td> </tr> <tr> <td>Explanation to the good example</td> <td>Çalışanlara yemek ve ulaşım ücretsiz olarak sağlanmaktadır. Meal and transportation is provided by the employer free of charge.</td> </tr> <tr> <td>Evidence</td> <td>Worker and management interview.</td> </tr> </tbody> </table>		Good Example		Reference	ZAF600012622	Clause	5 - Living Wages are Paid	Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	Subcategory	Benefits & Insurance	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Explanation to the good example	Çalışanlara yemek ve ulaşım ücretsiz olarak sağlanmaktadır. Meal and transportation is provided by the employer free of charge.	Evidence	Worker and management interview.
Good Example																	
Reference	ZAF600012622																
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Subcategory	Benefits & Insurance																
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Explanation to the good example	Çalışanlara yemek ve ulaşım ücretsiz olarak sağlanmaktadır. Meal and transportation is provided by the employer free of charge.																
Evidence	Worker and management interview.																

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

6: Compliance Requirements

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

Regular working hours scheduled as 3 shift for weaving, dyeing section workers between 08:00, 16:00 and 24:00 including 30' break x 6 days in a week and others are work from 08:00 to 18:00 including 15' x 2 tea breaks and 30' lunch break x days.

Weekly regular working hours was defined as 45 hours according to the law.

Working hours recorded by card activated system. Sunday is permanent off day of the workers.

No excessive overtime was observed also overtime were paid as %150 of hourly wage as per law.

Evidence examined:

Attendance records of employees were reviewed.
Interviews were conducted with employees and management

Any other comments:

None

Working hours' analysis

Systems & Processes

What timekeeping systems are used?	Card activated system
Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No (please explain)
Is this allowed by local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Maximum number of days worked without a day off (in sample):	6
Standard/Contracted Hours worked	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No % of workers: null% Frequency:
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Overtime Hours worked	
Actual overtime hours worked in sample (State per day/week/month)	In July 2022 max 3 hours/day, 14 hours/week and 14 hours/month In October 2022 1 hour/day, 3 hours/week and 3 hours/month In December 2022 3 hours/day, 14 hours/week and 14 hours/month
Combined hours (standard or contracted + overtime hours = total) over 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The maximum weekly working hours were 59.
Approximate percentage of total workers on highest overtime hours:	10%
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information Please give details: Based on worker interview, they feel free to reject overtime.
Overtime premium	
Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium Please give details: At least %150 of hourly wage were paid as per local law.
Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No All employees who work overtime is paid monthly in accordance with the law.
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.	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay <input type="checkbox"/> Collective Bargaining agreements <input checked="" type="checkbox"/> Other

Please give details	Not paid less than 125%.
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other)	<input type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week is voluntary <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input checked="" type="checkbox"/> Other reasons (please specify)
Please give details	No more than 60 hours/week was observed.
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	No more than 60 hours/week was observed.
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

7 - No Discrimination is Practiced
[Summary of Findings]

7: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

Confirmed with management & employee interviews as well as document review in accordance with SMETA Best Practice Guidance and Local Law.
No evidence against discrimination requirements of the client was found during the audit processes.
Employees stated that they were paid and treated equally.

Evidence examined:

Personnel files Pay slips
Company social compliance policy Employee interview

Any other comments:

None

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 46%	Female: 54%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	15 production supervisor, test lab, Re&De	
Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	<input type="checkbox"/> Hiring <input type="checkbox"/> Promotion	<input type="checkbox"/> Compensation <input type="checkbox"/> Termination or retirement <input type="checkbox"/> Access to training <input checked="" type="checkbox"/> No evidence of discrimination found
Please give details	Discrimination policy and procedure training are given to employees. Also, discipline rules are explained.	
Professional Development		
What type of training and development are available for workers?	Discrimination policy and procedure training are given to employees. Also, discipline rules are explained.	
Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

8 - Regular Employment Is Provided
[Summary of Findings]

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

Current Systems and Evidence Examined

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

Current Systems:

Employees' labor contracts were available in their personnel files.
 Labor 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.
 All workers are permanent and local. There were also 2 service provider company with 27 workers, also they are permanent workers.

Evidence examined:

Personnel files, employment contracts, social insurance records were checked. Management & employees' interviews.

Any other comments:

None

Responsible Recruitment

All Workers

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

Migrant Workers

Type of work undertaken by migrant workers:	There was no migrant worker in the facility.
---	--

Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0
Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There was no migrant worker in the facility.
Is there any observation on this finding?	There was no migrant worker in the facility.
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Non-employee workers	
Recruitment Fees	
Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Agency Workers (if applicable) (Workers sourced from a local agent who are not directly paid by the site, but paid by the agency. Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)	
Number of agencies used (average):	2
Please provide the names of agencies if applicable	DESECURE OZEL GUVENLIK HIZMETLERI for security staff and DENTAT YEMEK GIDA for kitchen staff.
Were agency workers' age / pay / hours included within the scope of this audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were sufficient documents for agency workers available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there a legal contract agreement with all agencies?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Agency workers has a contract with their own employer and also agency contract were available between companies.
Does the site have a system for checking labour standards of agencies?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Agencies working condition including payments were regularly check by HR team and CSR resp.
Contractors (Contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider.)	
Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There was no contractor.
Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There was no contractor.

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

8A: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

There was no subcontractor process. All the production process conducted on site. No missing process was observed on site. All the process conducted in house, and current capacity is meet, declared capacity. No home workers in the company.

Evidence examined:

Subcontracting procedure
Monitoring procedure
Production record review
Management and worker interview

Any other comments:

None

Summary of sub-contracting – if applicable

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

Summary of homeworking – if applicable

Is homeworking used at this site? Yes No

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

9: Compliance Requirements
 9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
 9.2 companies should provide access to a confidential grievance mechanism for all workers

Current Systems and Evidence Examined

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

Current Systems:

There was a well detailed disciplinary procedure, for disciplinary rule.

Evidence examined:

Worker interview, document review and management interview.

Any other comments:

None

Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There are published, anonymous and open channels available for reporting any violations of Labour standards. The employees can report to the legal authorities. There is suggestion box for reporting grievances.
If yes, are workers aware of these channels and have access? Please give details.	Workers are aware of these channels. There are published, anonymous and open channels available for reporting any violations of Labour standards.
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Suggestion boxes, employee representative, open door policy.
Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Worker <input checked="" type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other
Please provide grievance mechanism details	There was a worker representation system. Representative controls the suggestions inside the facility.
Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
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)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:

If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There was no deduction based on disciplinary rule, only taxes, social security payments and unemployment benefits were deducted.

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

10A: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

There was no migrant worker in the facility.

All workers were hired by the facility directly.

Based on the review of employee attendance records and employee's interview, the facility has not employed any foreign nationals.

Based on the review of employee personal files, all the employees are holding the legal rights to work.

Evidence examined:

Work permits

ID copies and social security registrations of the sampled employees were reviewed

Any other comments:

None

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

10B2: Compliance Requirements

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

There is a written environmental policy of the facility. The policy refers to local and international laws and regulations. The facility has a commitment to follow these requirements. All wastes were given to authorized companies for discharge.

There was environment permit.

There was approved from local authority industrial waste management plan in the company.

Environmental impact assessment permit exception decision letter was available on-site.

Evidence examined:

Environmental documents such as environmental impact assessment, environmental policy were checked

Any other comments:

none

Attachments



Signed CAP.pdf



Lunch hall (2).JPG



Suggestion and complaint box and notice board.JPG



Lunch hall.JPG



Lavatory.JPG



Outside view of B3.JPG



Notice board.JPG



Forklift.JPG



Longitudinal cutting of towel.JPG



First aid kit.JPG



Eye wash station.JPG



Fire hose.JPG



Firefighting equipments.JPG



Hand wash basin.JPG



Cutting of hometex.JPG



Chemical storage.JPG



Boiler room.JPG



Infirmary.JPG



Clinic.JPG



Evacuation route.JPG



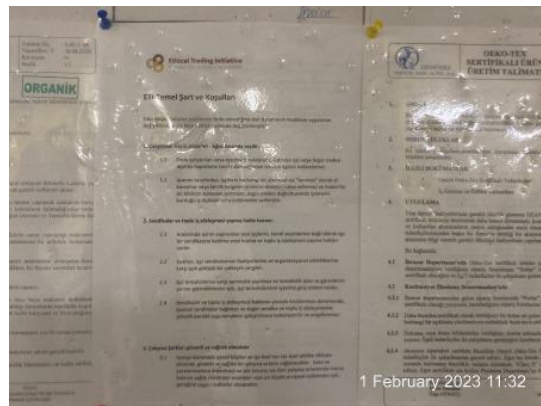
Cutting of hometex (2).JPG



Emergency stop.JPG



Outside view of B2.JPG



Eti Base Code.JPG



Packing section.JPG



Cutting.JPG



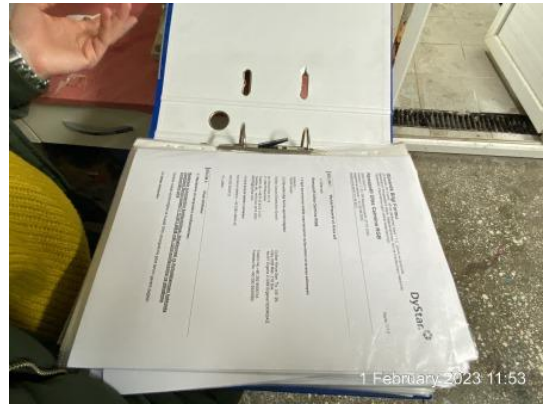
Packing of hometex.JPG



Potable water.JPG



Printing section.JPG



SDS.JPG



Assembling point.JPG



Horizontal cutting of towel.JPG



Sewing section of hometex.JPG



Outside view of B4 warehouse.JPG



Building 1 main management and sewing.JPG



Dye preparation.JPG



Dyeing section.JPG



Fire alarm button.JPG



Evacuation Map.JPG



PPE (2).JPG



Hand sanitization chemical.JPG



Fire alarm system.JPG



Emergency exit.JPG



PPE.JPG



Electrical panel.JPG



Metal free zone.JPG



Breastfeeding room.JPG



Powder Dye warehouse.JPG



QC of hometex.JPG



Indite of the facility.JPG



Packing of hometex (2).JPG



Kitchen.JPG



Fire extinguisher.JPG



Sewing section.JPG



Authomated sewig of towel.JPG



Sewing of Hometex.JPG



Packing of lingerie.JPG



Dyeing machine.JPG



Knitting section.JPG



Lockers.JPG



Building 6 knitting and sewing section.JPG



Fabric finishing process.JPG



QC section.JPG



Anti Slip Precaution.JPG



Hydrant.JPG



Warehouse (2).JPG



Warehouse.JPG



Waste storage.JPG



warning sign.JPG



Time recording device.JPG



Worker with PPE.JPG



Towel packing.JPG



Warning signs.JPG



Visual alarm at weaving area.JPG



Yarn dyeing section.JPG



Weaving section.JPG



Ventilation system.JPG



Test lab.JPG



Outside view of B5 Dyeing.JPG



Declaration.pdf



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