




Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: (only available on Sedex System)	ZC: Firma Sedex üyesi değildir. / The facility is not a Sedex member.	Sedex Site Reference: (only available on Sedex System)	ZS: Firma Sedex üyesi değildir. / The facility is not a Sedex member.	
Business name (Company name):	OKYANUS MUTFAK ESYALARI SAN. VE DIS. DIC. LTD. STI.			
Site name:	OKYANUS MUTFAK ESYALARI SAN. VE DIS. DIC. LTD. STI.			
Site address: (Please include full address)	Ikitelli OSBM ah. Eski Turgut Ozal Cad. No: 4 B Blok No: 105-105/A Basaksehir / Istanbul	Country:	TURKEY / TURKIYE	
Site contact and job title:	NECLA BUYUK – KALITE YONETIM SISTEMI TEMSILCISI / QUALITY MANAGEMENT SYSTEM REPRESENTATIVE			
Site phone:	+90 532 404 8137	Site e-mail:	kys@okyanushome.com	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar	<input checked="" type="checkbox"/> Business Ethics
Date of Audit:	13.08.2020			

Audit Company Name & Logo: 	Report Owner (payer): <i>(If paid for by the customer of the site please remove for Sedex upload)</i> OKYANUS MUTFAK ESYALARI SAN. VE DIS. DIC. 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 was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

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

Due to the company was established in January 2020, time and payment records have been reviewed as of January 2020.

The social compliance responsible were interviewed additionally regarding environmental 4-pillar requirements and business ethics issues due to special requirement of 4-pillar audit. Because of Covid-19 epidemic issue, group interview was out of scope employee interviews were performed only as individual interviews, and no group interviews were conducted

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

Lead auditor: SEVINC YILDIRIM - Auditor APSCA number: RA21703531

Lead auditor APSCA status: RA

Team auditor: SEDA TURK - Auditor APSCA number: RA21703619

Interviewers: SEDA TURK APSCA number: RA21703619

Report writer: SEVINC YILDIRIM (RA)

Report reviewer: RAMA RAO(Reviewer)

Date of declaration: 13.08.2020

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

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

Summary of Findings

Issue (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.		Area of Non-Conformity (Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)				Record the number of issues by line*:			Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
		ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A	Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>		2	0	<ul style="list-style-type: none"> OBS#1: Stakeholder (Subcontractor/ suppliers mapping) are not defined that are used by the facility. OBS#2: The facility does not measure the direct, indirect and potential impact on its stakeholders' human rights
0B	Management systems and code implementation		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> None observed
1.	Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> None observed
2	Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> None observed
3	Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	9	0	0	<ul style="list-style-type: none"> NC#1: Periodical health checks reports of 1 young employee was expired in the company (last report date :27.01.2020). NC#2: Emergency exit door of the shipping area , emergency exit door of the lunch hall and emergency exit door of the man changing room were opening inwards in the company.

									<ul style="list-style-type: none"> - NC#3: Emergency directions do not point the emergency exits in the right direction in the evacuation plans in the company. - NC#4: It was noted that there was no eye wash station at the facility. - NC#5: No secondary containment was provided for chemicals such as solvent in the production area. - NC#6: It was noted the facility is in a dangerous category and there were 4 first aid certificated employees in the facility but at least 1 employee more are needed. - NC#7: There was no periodical inspection report for fire-fighting system (which is working with water) at the facility. - NC#8: There is no periodical inspection report for ventilation system. - NC#9: It was noted that there was no machine guard (pulley) for 2 presses used in production.
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> • None observed
5	<u>Living Wages and Benefits</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	1	0	2	<ul style="list-style-type: none"> - NC#10: There are 2 contractor employees (BEYAZ SAYFA BERCESTE YEMEK) for catering services. It was noted that there were no working hours records (normal + overtime) for catering employees at the facility. So these employees working hours (normal +

									<p>overtime) and payments could not be verified. Contractor employees are %30 of the total employees.</p> <ul style="list-style-type: none"> - GE#1: Meal is provided free of charge to all employees. - GE#2: Transportation allowances are monthly paid to employees
6	<u>Working Hours</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	1	0	0	<ul style="list-style-type: none"> - NC#11: There are 2 contractor employees (BEYAZ SAYFA BERCESTE YEMEK) for catering services. It was noted that there were no working hours records (normal + overtime) for catering employees at the facility. So these employees working hours (normal + overtime) and payments could not be verified. Contractor employees are %30 of the total employees.
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> • None observed
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> • None observed
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> • None observed
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> • None observed
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> • None observed
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> • Not applicable

10B4	Environment 4-Pillar		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2	0	0	<ul style="list-style-type: none"> - NC#12: It was noted that there was no environment permit or environment out of scope letter in the facility. - NC#13: There was no environment impact assessment in the facility.
10C	Business Ethics		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2	0	0	<ul style="list-style-type: none"> - NC#14: There is no notification mechanism for reporting unethical issues in the business, in a way that safeguards the safety of the Reporting Person. - NC#15: Staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are not trained on what action to take in the event of an issue arising in their area.

General observations and summary of the site:

Site Summary

- OKYANUS MUTFAK ESYALARI SAN. VE DIS. DIC. LTD. STI. was established on January 2020. It is located in Basaksehir, Istanbul/Turkey since then.
- The products manufactured at the facility is metal kitchen & bathroom and home equipment
- Total facility area is 5150 sqm.
- Monthly capacity is between 150.000-200.000 pieces/month.
- Overall responsibility for meeting the standards is taken by NECLA BUYUK – QUALITY MANAGEMENT SYSTEM REPRESENTATIVE
- Main production processes of the facility are welding, assembly, bending, centering, chrome plating, solvent cleaning, powder coating, packaging
- There are total of 71 employees on site. There are 67 local and 2 migrant workers.

Administrative: 10(7 male, 3 female)
Production: 59 (54 male, 5 female)
Catering: 2 (1 male, 1 female)

Totally: 71

of young employee: 1
 # of pregnant employee: 0
 # of disabled employee: 0
 # maternity leave: 0
 # migrant: 2
 # daily worker: 0
 # of contractor employee: 2

- There is 1 contractor at the facility:
 - 1. Beyaz Sayfa Berceste Yemek Hizmetleri San. ve Tic. Ltd. Sti. for catering services.
- The youngest workers' age is 16 years old.
- There is 2 worker representatives employee at the facility.
- There is no union at this facility.
- The facility uses 1 sub-contractors for chrome plating processes.
- According to the documents examined at least legal minimum pay was paid to all employees.
 *Since January 1st, 2020: 2.943,00 TL (Gross- including subsistence allowance); 2.324,70TL (Net- including subsistence allowance).
- Card scanning time recording system is available.
- Working hours are:
 From 08:00 to 18:30 (including 60 minutes lunch break, 2x15 minutes tea break) x 5 days
 Totally: 45 hours / week.
- Peak seasons: June, July, August
- Payment Period: Monthly
- Payment Day: 1-5th of each month
- Payments of the employees are done via bank accounts.
- 6 workers were selected for interview including 4 male and 2 female employees. Because of Covid-19 epidemic issue, group interview was out of scope employee interviews were performed only as individual interviews, and no group interviews were conducted.
- 10 employees' attendance records and payroll records of July 2020 (last paid and peak month), May 2020 (non-peak month), March 2020 (random month) were reviewed.
- Overtime hours in sample were (as minimum and maximum)
 - 0 Hours/ Month in July 2020 (last paid and peak month),
 - 0 Hours/ Month in May 2020 (non-peak month)
 - 0 Hours/ Month in March 2020 (random month)

COVID-19 Observations

- The facility has taken the necessary measures to protect its employees from Coronavirus; PPE, hand disinfectant, compliance with social distance rule, etc.
- Hand disinfectant had been provided at the entrances to the facility production area, in offices and in common social areas.
- All employees were wearing masks at the facility.
- Information posters of COVID-19 had been placed on the communication boards.

Audit Process

At 09:00 AM on 13th August 2020, SEVINC YILDIRIM – LEAD AUDITOR and SEDA TURK –AUDITOR entered the facility, and then held an opening meeting according to the ETI Base Code; the facility management was present in the meeting. Opening and closing meeting was held with NECLA BUYUK – QUALITY MANAGEMENT SYSTEM REPRESENTATIVE, MEHMET YAVUZ YUKSEL - SOCIAL COMPLIANCE RESPONSIBLE, ABDULLAH KOCAK – HUMAN RESOURCES AND ADMINISTRATIVE AFFAIRS MANAGER, ISMAIL CICI – HUMAN RESOURCES ADMINISTRATIVE AFFAIRS RESPONSIBLE, ALI GULSEN - PURCHASING MANAGER.

Issues found

NC's

HEALTH AND SAFETY NO:3

- NC#1: Periodical health checks reports of 1 young employee was expired in the company (last report date :27.01.2020).
- NC#2: Emergency exit door of the shipping area , emergency exit door of the lunch hall and emergency exit door of the man changing room were opening inwards in the company.
- NC#3: Emergency directions do not point the emergency exits in the right direction in the evacuation plans in the company.
- NC#4: It was noted that there was no eye wash station at the facility.
- NC#5: No secondary containment was provided for chemicals such as solvent in the production area.
- NC#6: It was noted the facility is in a dangerous category and there were 4 first aid certificated employees in the facility but at least 1 employee more are needed.
- NC#7: There was no periodical inspection report for fire-fighting system (which is working with water) at the facility.
- NC#8: There is no periodical inspection report for ventilation system.
- NC#9: It was noted that there was no machine guard (pulley) for 2 presses used in production.

WAGE AND BENEFITS NO:5

- NC#10: There are 2 contractor employees (BEYAZ SAYFA BERCESTE YEMEK) for catering services. It was noted that there were no working hours records (normal + overtime) for catering employees at the facility. So these employees working hours (normal + overtime) and payments could not be verified. Contractor employees are %30 of the total employees.

WORKING HOURS NO:6

- NC#11: There are 2 contractor employees (BEYAZ SAYFA BERCESTE YEMEK) for catering services. It was noted that there were no working hours records (normal + overtime) for catering employees at the facility. So these employees working hours (normal + overtime) and payments could not be verified. Contractor employees are %30 of the total employees.

ENVIRONMENT 4 PILLAR NO:10B.4

- NC#12: It was noted that there was no environment permit or environment out of scope letter in the facility.
- NC#13: There was no environment impact assessment in the facility.

BUSINESS ETHICS NO:10C

- NC#14: There is no notification mechanism for reporting unethical issues in the business, in a way that safeguards the safety of the Reporting Person.
- NC#15: Staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are not trained on what action to take in the event of an issue arising in their area.

Observations

OA. UNIVERSAL RIGHTS COVERING UNGP

- OBS#1: Stakeholder (Subcontractor/ suppliers mapping) are not defined that are used by the facility.
- OBS#2: The facility does not measure the direct, indirect and potential impact on its stakeholders' human rights

Good Examples

WAGES & BENEFITS NO:5

- GE#1: Meal is provided free of charge to all employees.
- GE#2: Transportation allowances are monthly paid to employees

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

Site Details

Site Details																							
A: Company Name:	OKYANUS MUTFAK ESYALARI SAN. VE DIS. DIC. LTD. STI.																						
B: Site name:	OKYANUS MUTFAK ESYALARI SAN. VE DIS. DIC. LTD. STI.																						
C: GPS location: (If available)	GPS Address: 41.071191, 28.814471	Latitude: 41°04'16.3"N Longitude: 28°48'52.1"E																					
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Opening and operating permit date and no: 22.07.2020 / 2020-756 (No expiry/validity)																						
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Metal kitchen & bathroom and home equipment.																						
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>OKYANUS MUTFAK ESYALARI SAN. VE DIS. DIC. LTD. STI. was established on January 2020. It is located in Basaksehir, Istanbul/Turkey since then.</p> <p>The products manufactured at the facility is metal kitchen & bathroom and home equipment</p> <p>Total facility area is 5150 sqm.</p> <p>Monthly capacity is between 150.000-200.000 pieces/month.</p> <table border="1"> <thead> <tr> <th>Production Building no</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Entrance</td> <td>Another Company</td> <td>NA</td> </tr> <tr> <td>Mezzanine floor</td> <td>Showroom, offices, doctor room, meeting room</td> <td></td> </tr> <tr> <td>Floor 1</td> <td>Production area, lunch hall, dressing rooms, warehouse</td> <td>NA</td> </tr> <tr> <td>Floor 2</td> <td>Another Company</td> <td>NA</td> </tr> <tr> <td>Floor 3</td> <td>Another Company</td> <td>NA</td> </tr> <tr> <td>Is this a shared building?</td> <td>Yes</td> <td>NA</td> </tr> </tbody> </table> <p>The building structure is concrete.</p> <p>For below, please add any extra rows if appropriate.</p>		Production Building no	Description	Remark, if any	Entrance	Another Company	NA	Mezzanine floor	Showroom, offices, doctor room, meeting room		Floor 1	Production area, lunch hall, dressing rooms, warehouse	NA	Floor 2	Another Company	NA	Floor 3	Another Company	NA	Is this a shared building?	Yes	NA
Production Building no	Description	Remark, if any																					
Entrance	Another Company	NA																					
Mezzanine floor	Showroom, offices, doctor room, meeting room																						
Floor 1	Production area, lunch hall, dressing rooms, warehouse	NA																					
Floor 2	Another Company	NA																					
Floor 3	Another Company	NA																					
Is this a shared building?	Yes	NA																					

	<p>F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F2: Please give details: NA</p> <p>F3: Does the site have a structural engineer evaluation? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>F4: Please give details: The facility has building usage permit.</p>
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: (if applicable)	June, July, August
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	<p>The products manufactured at the facility is metal kitchen & bathroom and home equipment.</p> <p>Main production processes of the facility are welding, assembly, bending, centering, chrome plating, solvent cleaning, powder coating, packaging.</p> <p>39 point welding machines, 3 CNC wire bending machines, 3 eccentric presses, 1 moulder milling machine, 1 column drill bench, 2 belt sanding machine, 2 arm scissors, 1 sandblasting machine, 1 compressor, 1 flat bending machine, 1 electrostatic paint plant , 2 pallet trucks, 1 hydraulic lift.</p>
J: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (Open door policy, worker representatives, suggestion boxes) <input type="checkbox"/> None
K: Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" 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

Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 09:00 A2: Day 1 Time out: 17:00	A3: Day 2 Time in: N/A A4: Day 2 Time out: N/A	A5: Day 3 Time in: N/A A6: Day 3 Time out: N/A
B: Number of auditor days used:	2 AUDITORS X 1 DAY (1.5 MAN DAY)		
C: Audit type:	<input checked="" type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define		
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 2 weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If No, why not The facility is not member of the Sedex		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	NECLA BUYUK – KALITE YONETIM SISTEMI TEMSILCISI / QUALITY MANAGEMENT SYSTEM REPRESENTATIVE		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	NA		
J: Previous audit type:	NA		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No NA		

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

A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	There was no worker committee at the facility. There were 2 worker representatives at the facility. 1 worker representative was included in employee interviews.		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	N/A. There is no union in the facility.		

Worker Analysis

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

Worker Analysis								
	Local			Migrant*				Total
	Permanent	Temporary	Agency (contractor)	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	59	0	1	2	0	0	0	62
Worker numbers – female	8	0	1	0	0	0	0	9
Total	67	0	2	2	0	0	0	71
Number of Workers interviewed – male	3	0	0	1	0	0	0	4
Number of Workers interviewed – female	1	0	1	0	0	0	0	2
Total – interviewed sample size	4	0	1	1	0	0	0	6



A: Nationality of Management	TURKISH	
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>	Nationalities: B1: Nationality 1: TURKISH B2: Nationality 2: SYRIAN B3: Nationality 3: __NA__	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: NA
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1 __97 %__ C1: approx % total workforce: Nationality 2 __3 %__ C2: approx % total workforce: Nationality 3 __NA__	
D: Worker remuneration (management information)	D: _____% workers on piece rate D1: __100__% hourly paid workers D2: _____% salaried workers Payment cycle: D3: _____% daily paid D4: _____% weekly paid D5: __100__% monthly paid D6: _____% other D7: If other, please give details	



Worker Interview Summary		
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	0 - Due to Covid 19, all employee interviews were performed as individual interviews, and no group interviews were conducted.	
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 4	D1: Male: 4
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details	
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent	
H: What was the most common worker complaint?	None	
I: What did the workers like the most about working at this site?	Payments, social insurance, management attitude, working conditions.	
J: Any additional comment(s) regarding interviews:	Employees enjoy working at this facility, they said that they had a good relationship with management.	
K: Attitude of workers to hours worked:	Employees declared that, working hours are comfortable. Also, they expressed that they sometimes wanted to work extra, to earn more money, however they could turn down overtime if they wanted.	
L. Is there any worker survey information available?		
<input type="checkbox"/> Yes		

☒ No

L1: If yes, please give details:

M: Attitude of workers:

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

The general attitude of the employees was positive. Social insurance and payment on time were the positive issues raised by the employees. There is no discrimination, harassment, abuse or forced labour

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

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

There was no union in the facility. There were 2 worker representatives at the facility. 1 worker representative was included in employee interviews. No negative comment was noted during the worker representative interview.

O: Attitude of managers:

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

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

Audit Results by Clause

0A: Universal Rights covering UNGP

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

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

The facility has procedures that include a social compliance policy

Overall responsibility for meeting the standards is taken by NECLA BUYUK – QUALITY MANAGEMENT SYSTEM REPRESENTATIVE.

Policies and procedures are communicated to employees through announcement boards.

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

Details:

Company policies and procedures

Grievance Mechanism Feedbacks

Management interview

Employee interviews

Facility tour

Any other comments: None

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

Findings		
1-Finding: Observation <input checked="" type="checkbox"/> Company NC <input type="checkbox"/> Description of observation: OBS#1: Stakeholder (Subcontractor/ suppliers mapping) are not defined that are used by the facility. Local law or ETI/Additional elements / customer specific requirement: 0.A.3 Businesses shall identify their stakeholders and salient issues. Comments: Please map your all stakeholders.	Objective evidence observed: 1&2 Management interview, document review	
2-Finding: Observation <input checked="" type="checkbox"/> Company NC <input type="checkbox"/> Description of observation: OBS#2: The facility does not measure the direct, indirect and potential impact on its stakeholders' human rights Local law or ETI/Additional elements / customer specific requirement: 0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights. Comments: Please measure the direct, indirect and potential impact on its stakeholders' human rights		

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

Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 2019 __NA__ %	A2: This year 2020 __Not provided__ %
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]	Not provided	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 2019 __NA__ %	C2: This year 2020 __ Not provided __ %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	5 %	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: The accident record system was available.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: 2019 Number: NA	F2: This year: 2020 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: 0	H2: This year: 0
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months __0__% workers	I2: 12 months __0__% workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months __0__% workers	J2: 12 months __0__% workers

0B: Management system and Code Implementation

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

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

Current Systems and Evidence Examined

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

Current systems:

The facility has disciplinary procedures and work rules. All posted onsite.
All social compliance issues are managed and monitored internally.
The employees have information regarding social compliance, social and legal rights.
The facility management has already posted ETI Base code on notice boards.
Overall responsibility for meeting the standards is taken by NECLA BUYUK – QUALITY MANAGEMENT SYSTEM REPRESENTATIVE.

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

Details:
Company policies and procedures
Employee interviews
Training records
Management interview
Facility tour

Any other comments: None

Management Systems:

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

☐ Yes

☒ No

A1: Please give details: N/A

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

☒ Yes

☐ No

B1: Please give details: Policies and procedures about reduce the risk of forced labour, child labour, discrimination and harassment & abuse are available.

<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>Through documents review and workers interview, policy on 'No harsh treatment and Environment' was fully in compliance with the code.</p> <p>Workers stated no forced labour, no child labour was found (through interview and document checks), there were both female and male among management/supervisors.</p>
<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</p> <p>D1: Please give details: These policy and procedures are communicated to the all staff through posters.</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</p> <p>E1: Please give details: There are training records.</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</p> <p>F1: Please give details:</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</p> <p>G1: Please give details: ABDULLAH KOCAK-HUMAN RESOURCES</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</p> <p>H1: Please give details: NECLA BUYUK – QUALITY MANAGEMENT SYSTEM REPRESENTATIVE</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</p> <p>I1: Please give details: All worker information is kept on their personnel files. These files are kept on accounting room.</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</p> <p>J1: Please give details: Access and sharing information is limited.</p>
<p>K: Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>K1: Please give details: Policy and procedure effectiveness is evaluated in the risk assessment.</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</p>

	L1 Please give details: The facility performs a corrective action plan for the findings that addressed on risk assessment.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: Facility has an own code which requires labour standards of its own suppliers.
Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: The facility has all required land rights licenses and permissions.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: The facility fulfils the requirements during getting facility opening and operating permit. Also, the facility has construction permit and exemption letter of environmental impact.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: If yes, how does the company obtain FPIC: The facility has application letter for environmental permit. Please refer to NC#12
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: The facility is the renter of the building and the permit of construction use has been given by the municipality.
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: There is no land acquisition. In case a land acquisition, the facility applies to municipality and construction permit etc.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details: There is no illegal appropriation of land for facility building.

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

Observation:	
Description of Good Example (GE): None Observed	Objective evidence observed: Not applicable

Good Examples observed:	
Description of Good Example (GE): None Observed	Objective evidence observed: Not Applicable

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 was freely chosen.

Overtime practices are performed on voluntary basis.

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

Movement of employees at the facility were not limited.

Employees have free access to toilets and drinkable water.

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

Details:

Facility tour

Employee interviews

Management interview

Company policies and procedures

Any other comments: None

A: Is there any evidence of retention of original documents, e.g. passports/ID's

☐ Yes

☒ No

A1: If yes, please give details and category of workers affected: N/A

B: Is there any evidence of a loan scheme in operation

☐ Yes

☒ No

B1: If yes, please give details and category of worker affected: N/A

C: Is there any evidence of retention of wages /deposits

☐ Yes

☒ No

C1: If yes, please give details and category of worker affected: N/A

D: Are there any restrictions on workers' freedom to terminate employment?

☐ Yes

☒ No

D1: Please describe finding: N/A

E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding:
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding: N/A
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input 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 facility has a policy and procedure for avoiding forced / trafficked / bonded labour. No observed forced / trafficked / bonded labour.
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: The facility has a policy and procedure for reducing the risk of forced/trafficked labour.

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

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

Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed: Not applicable

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 boxes are in the facility.

There is an open-door policy that employees can complain directly to the top management.

There are 2 worker representatives.

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

Details:

Facility tour

Employee interviews

Management interview

Company policy and procedures

Any other comments: None

A: What form of worker representation/union is there on site?	<input type="checkbox"/> Union (name) <input type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (Open-door policy, worker representatives, suggestion boxes) <input type="checkbox"/> None
B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<p>D: Is there any other form of effective worker/management communication channel? <i>(Other than union/worker committee e.g. H&S, sexual harassment)</i></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D1: Please give details: Employees declared that they can go directly to the management for their suggestions whenever they want. In addition to this, suggestion boxes are placed in several places of the company. There are 2 worker representative.</p> <p>D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes (for worker representatives) <input type="checkbox"/> No</p>	
<p>E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>E1: Please give details: N/A-There is no union at the facility.</p>	
<p>F: Name of union and union representative, if applicable:</p>	<p>There is no union at the facility.</p>	<p>Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p>
<p>G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?</p>	<p>There are 2 worker representative, open door policy and suggestion boxes in the facility.</p>	<p>Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>H: Are all workers aware of who their representatives are?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>I: Were worker representatives freely elected?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>I1: Date of last election: 09.06.2020</p>
<p>J: Do workers know what topics can be raised with their representatives?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>K: Were worker representatives/union representatives interviewed?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, please state how many: 1 worker representative was interviewed in the facility</p>	
<p>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></p>	<p>N/A – There is no union or committee at the facility.</p>	
<p>M: Are any workers covered by Collective Bargaining Agreement (CBA)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	

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

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

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

Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed: Not applicable

3: Working Conditions are Safe and Hygienic

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

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

ETI

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

3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. General Health and Safety management

- 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 H&S manager, 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.
- NC#6: It was noted the facility is in a dangerous category and there were 4 first aid certificated employees in the facility but at least 1 employee more are needed.
- NC#9: It was noted that there was no machine guard (pulley) for 2 presses used in production.

2. Fire Safety

- 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 23.06.2020.
- Training had been given by fire marshals had been specially selected for extra training.
- Fire alarm is provided and active.
- NC#2: Emergency exit door of the shipping area , emergency exit door of the lunch hall and emergency exit door of the man changing room were opening inwards in the company.
- NC#3: Emergency directions do not point the emergency exits in the right direction in the evacuation plans in the company.
- NC#7: There was no periodical inspection report for fire-fighting system (which is working with water) at the facility.

3. Electrical safety

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

4. Chemical safety

- MSDS forms are provided for chemical products.
- NC#4: It was noted that there was no eye wash station at the facility.
- NC#5: No secondary containment was provided for chemicals such as solvent in the production area.
- Risk assessment and emergency plans are updated according to Covid-19.

5. Hygiene

- 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

COVID-19 Observations

- The facility has taken the necessary measures to protect its employees from Coronavirus; PPE, hand disinfectant, compliance with social distance rule, etc.
- Hand disinfectant had been provided at the entrances to the facility production area, in offices and in common social areas.
- All employees were wearing masks at the facility.
- Information posters of COVID-19 had been placed on the communication boards.

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

Details:

- Health & Safety documents
- 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

A: 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 A1: Please give details: General Health & Safety and Occupational Health & Safety policies and procedures were prepared by occupational health and safety expert. It was shared with employees via trainings
B: Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

	B1: Please give details: The facility has a detailed health & safety procedure and this procedure is explained in health and safety trainings to employees.
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: There is no additional building without permission provided.
D: Are visitors to the site informed on H&S and provided with personal protective equipment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: It is provided by administrative personnel.
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The facility has doctor room which in compliance with legal requirement is provided in the facility.
F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please give details: Doctor and first aid staff are available in the facility. There are 4 first aiders and a part time doctor. The first aid boxes are placed at every appropriate area. Please refer to NC#6
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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: Worker transportation is not provided by the facility. Transportation allowances are monthly paid to employees
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: There are enough lockers.
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: The risk assessment has working hour's section.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No J1: Please give details: Please refer to NC#12

K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?

☐ Yes N/A
☐ No

K1: Please give details: No banned chemical is used by the facility.

Non-compliance:

1. Description of non-compliance:

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

Periodical health checks reports of 1 young employee was expired in the company (last report date :27.01.2020).

Local law and/or ETI requirement

Regulation about Procedures and Principles on Employment of Child and Young Workers (No: 25425, Date: 06.04.2004)

Art. 5 (rev:21.02.2013) – Workers under 18 years old can not be employed at works which over physical and psychological competence proven by facility doctor report.

OCCUPATIONAL HEALTH AND SAFETY LAW#6331(20/6/2012)

ARTICLE 15 – (1) The employer does the following:

a) Ensures that the employees are subjected to health surveillance, by taking into account the health and safety risks that they would encounter at the workplace;

b) In the following cases, they must ascertain that the employees' medical checkups are done:

1) When they start the job;

2) When they change their job;

3) When after repeated leaves because of an industrial accident, occupational disease or health issued, they request to return to the job;

4) Throughout the employment, at regular interval as decided by the Ministry according to the qualifications of the employee, the nature of the work and the danger class of the workplace.

(2) Those who will work at hazardous and very hazardous class workplaces will not be allowed to start work until they get a health report verifying that are medically fit for the job.

(3) Medical reports that must be obtained as a requirement under this Law must be obtained at the workplace health and safety unit or from the workplace doctor that works at the joint health and safety unit from which service is procured. Objections to the reports must be submitted to the arbitrator hospitals that are selected by the Ministry of Health, and their decisions will be final.

(4) All costs of the health surveillance and all additional cost that is incurred because of such surveillance will be borne by the employer, and the employee will not be charged for them.

(5) Medical details of the employee who has been examined will be kept confidential respecting the right of privacy.

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

Objective evidence observed:

1- Document Review & Management Interviews

as is reasonably practicable, the causes of hazards inherent in the working environment.

Recommended corrective action:

Periodical health check shall be at least every 6 months for young employees.

2. Description of non-compliance:

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

Emergency exit door of the shipping area , emergency exit door of the lunch hall and emergency exit door of the man changing room were opening inwards in the company.

Local law and/or ETI requirement

The Regulation On the Health and Safety Measures Taken for the Buildings and Additions (17.07.2013, No: 28710)

Appendix-1

Minimum Health and Safety Requirements for Buildings and Additions

Emergency Exit Routes and Doors

10 - a) All emergency exit routes and doors at workplaces are opened directly outside or a safety area and shall not be any obstacle in front of or behind them to avoid escaping.

10 - ç) All emergency exit doors are opened immediately and easily by employees in emergency cases. These doors are opened outward. Railing and revolving doors can not be used as emergency exits.

10 - d) There shall not be any obstacle that makes difficult to evacuate at emergency exit routes and doors, and on routes and exits which leading to emergency exit routes and doors. Emergency exit doors shall not be locked or conditioned by any material.

10 - e) All emergency exit routes and doors shall be marked properly in accordance with Regulation on Safety and Health Signs (date: 23/12/2003, No: 25325). Signs shall be placed at proper places and be permanent.

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.

Recommended corrective action:

It is recommended All emergency exit doors should be opened outwards direction.

3. Description of non-compliance:

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

Emergency directions do not point the emergency exits in the right direction in the evacuation plans in the company.

2- Site Tour

3- Site Tour

Local law and/or ETI requirement

In accordance with the Regulation for the Revision of the Regulation Protection Of Buildings Against Fire (19/12/2007) No : 26735 Art 7(Rev:10/8/2009-2009/15316 K.)

The fire evacuation plans should be posted at the production , warehouse, hotel , health or training facilities of which have an area more than 10.000 sqm

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.

Recommended corrective action:

Please ensure that the emergency directions included in the evacuation plans direct the emergency exits correctly.

4. Description of non-compliance:

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

It was noted that there was no eye wash station at the facility.

4- Site Tour

Local law and/or ETI requirement

In accordance with the Turkish Regulation on the Health and Safety Precautions Taken While Working with the Chemical Substances (12.08.2013) No: 28733

Art. 8 - (1) Employer shall take into consideration following issues in accordance with Regulation on Emergency Cases dated 18.06.2013 and No. 26861 for emergency cases which will be caused by chemical substances.

a) Preventive precautions against negative impacts of emergency cases are taken immediately and employees are informed. Necessary actions are taken to return the emergency cases to normal within the shortest time.

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.

Recommended corrective action:

It is recommended to provide eye wash station.

5. Description of non-compliance:

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

No secondary containment was provided for chemicals such as solvent in the production area.

5- Site Tour

Local law and/or ETI requirement

In accordance with the Turkish Regulation on the Health and Safety Precautions Taken While Working with the Chemical Substances (12.08.2013) No: 28733

Art. 8 - (1) Employer shall take into consideration following issues in accordance with Regulation on Emergency Cases dated 18.06.2013 and No. 26861 for emergency cases which will be caused by chemical substances.

a) Preventive precautions against negative impacts of emergency cases are taken immediately and employees are informed. Necessary actions are taken to return the emergency cases to normal within the shortest time.

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.

Recommended corrective action:

Please provide secondary containments for all chemicals in the facility in appropriate volume and form.

6. Description of non-compliance:

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

It was noted the facility is in a dangerous category and there were 4 first aid certificated employees in the facility but at least 1 employee more are needed.

Local law and/or ETI requirement

First-aid Regulation (29.07.2015), No : 29429

Obligatory first-aid trained employee employment.

Art 19 - (1) At the Occupational Health and Safety Scope; It is an obligation that having

- a) 1 first aider for every 20 employees for facilities at low hazardous class
- b) 1 first aider for every 15 employees for facilities at hazardous class
- c) 1 first aider for every 10 employees for facilities at high hazardous class

ETI;

3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.

Recommended corrective action:

It is recommended to provide 1 first aid certificated employee for each 15 employees

7. Description of non-compliance:

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

There was no periodical inspection report for fire-fighting system (which is working with water) at the facility.

Local law and/or ETI requirement

6- Document Review & Management Interviews

7- Document Review & Management Interviews

In accordance with Turkish Regulation about Occupational Health and Safety circumstances using work equipments (25/04/2013) No: 28628
 Addition III - Related Matters for Maintenance, Repairs and Periodical Checks
 Art 2.3.1 Unless otherwise specified in the relevant standards, periodic inspections of the installations are carried out annually.
 Periodical check period and check criteria for some installments are stated on Table 3 provided that the criteria stated in Art 2.1.1 are reserved.
 Table 3
 Equipment: Fire fighting installment, Hoses, Motopomps, Pipe Systems
 Check Period (Max): 1 year

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.

Recommended corrective action:

Please provide fire-fighting system periodic check reports with acceptable results.

8. Description of non-compliance:

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

There is no periodical inspection report for ventilation system.

Local law and/or ETI requirement

In accordance with The Turkish Regulation on the Health and Safety Measures Taken for the Buildings and Their Additions (17.07.2013) No:28710, Appendix 1 - 15- In the closed working place, there should be adequate fresh air available in accordance with the working method and the work done by employees.

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.

Recommended corrective action:

It is recommended to provide periodical inspection report for ventilation system.

9. Description of non-compliance:

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

It was noted that there was no machine guard (pulley) for 2 presses used in production.

Local law and/or ETI requirement

8- Document Review & Management Interviews

In accordance with Turkish Regulation about Occupational Health and Safety circumstances using work equipment (25/04/2013)

Appendix I

Minimum general requirements to be included in the job equipment

2-3 In all job equipment, there should have the system that can stop all parts of the equipment safely. In each working location, in accordance with the nature of the danger, there should be control system which can stop all or part of the equipment and ensure the safe condition of the related equipment.

2-5 Appropriate safety apparatus should be provided for the job equipment which have the risk of falling down or popping of piece out of the machine.

2-7 Appropriate safety measures should be taken for the risks of breaking off, breaking and scattering of the pieces that may cause a danger for the health and safety of the employees.

2-8 Appropriate safety guards and safety systems should be provided to prevent the reach to the dangerous areas of the machine or to stop these active areas before reaching them, if the mechanic contact with the active parts of the job equipment may cause a danger.

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.

Recommended corrective action:

Please provide the relevant machine protectors.

9- Site Tour

Observation:

Description of observation: None observed

Local law or ETI requirement: Not applicable

Recommended corrective action: Not applicable

Objective evidence observed:

Not applicable

Good Examples observed:

Description of Good Example (GE): None Observed

Objective Evidence Observed:

Not applicable

4: Child Labour Shall Not Be Used

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

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

ETI

4.1 There shall be no new recruitment of child labour.

4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

Current Systems and Evidence Examined

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

Current systems:

There is no child labour in the facility.

Child labour remediation plan which provides for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child is available.

There is 1 young employees who is working as helper in packing section

The youngest employee is 16 years old in the facility.

Working hours for young employees are:

From 08:00 to 18:30 (including 60 minutes lunch break, 2x45 minutes tea break) x 5 days

Totally: 40 hours/ week.

There is an informal procedure for checking ages of employees at application stage, and this includes checking ID's.

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

Details:

Facility tour

Personnel list

Personnel files

Employee interviews

Management interview

Any other comments: None

A: Legal age of employment:	15
B: Age of youngest worker found:	16
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)	1 % (There was 1 young worker and he was included the worker interview)
E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details The young employee works as helper in packing section

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

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

Good Examples observed:	
Description of Good Example (GE): None Observed	Objective evidence observed: Not applicable

5: Living Wages are Paid

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

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

ETI

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

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

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

Current Systems and Evidence Examined

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

Current systems:

All employees are paid at least legal minimum wage

There was no employee under the legal minimum wage.

All employees were covered with social insurance.

Payments of the employees were done via bank accounts.

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

Pay slips were provided to all employees regularly.

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

No deduction applied for disciplinary reasons.

10 employees' attendance records and payroll records of July 2020 (last paid and peak month), May 2020 (non-peak month), March 2020 (random month) were reviewed.

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

Details:

Payment records

Time records

Leave records

Social insurance records

Employee interviews

Management interview

Any other comments: None

Non-compliance:	
<p>10. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: There are 2 contractor employees (BEYAZ SAYFA BERCESTE YEMEK) for catering services. It was noted that there were no working hours records (normal + overtime) for catering employees at the facility. So these employees working hours (normal + overtime) and payments could not be verified. Contractor employees are %30 of the total employees.</p> <p>Local law and/or ETI requirement: In accordance with the Turkish Regulation on Working Hours Related to Labor Law, No: 25425, Date: 06.04.2004, Art. 9; The employer should document the working hours of employees appropriately.</p> <p>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.</p> <p>Recommended corrective action: It is recommended to provide all employees include time record system and keep records</p>	<p>Objective evidence observed:</p> <p>10- Document review, Management interview & Employee interview</p>

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

Good Examples observed:	
<p>Description of Good Example (GE):</p> <p>GE#1: Meal is provided free of charge to all employees. GE#2: Transportation allowances are monthly paid to employees</p>	<p>Objective Evidence Observed:</p> <p>1-2 Employee & Management Interviews, Document Review</p>

Summary Information

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: 45 hours/week	A1: 45 hours/week For catering employees: Please refer to NC#10	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No There is no CBA in the facility.
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 11 total working hours per day (regular + overtime), 270 overtime hours per year	B1: 0 Hours/ Month in July 2020 (last paid and peak month) 0 Hours/ Month in May 2020 (non-peak month) 0 Hours/ Month in March 2020 (random month) For catering employees: Please refer to NC#10	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No There is no CBA in the facility.
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: Since January 1st, 2020: 2.943,00 TL (Gross- including subsistence allowance); 2.324,70TL (Net-including subsistence allowance).	C1: Since January 1st, 2020: 2.943,00 TL (Gross- including subsistence allowance); 2.324,70TL (Net-including subsistence allowance). For catering employees: Please refer to NC#10	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No There is no CBA in the facility.
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 150% for overtime in weekdays and weekends.	D1: 150% for overtime in weekdays and weekends.	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No There is no CBA in the facility

	<p>Overtime premium for national/religious holidays is 200% (The employee gets one day salary for the related national holiday even though she/he does not work on this day. If she/he work, then additional 1 day salary is given to him/her; so the rate totally paid to him/her became 200% in case of doing overtime in national /religious holidays)</p>	<p>Overtime premium for national/religious holidays is 200% (The employee gets one day salary for the related national holiday even though she/he does not work on this day. If she/he work, then additional 1 day salary is given to him/her; so the rate totally paid to him/her became 200% in case of doing overtime in national /religious holidays)</p> <p>For catering employees: Please refer to NC#10</p>	
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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 (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	10 employees' attendance records and payroll records of July 2020 last paid and peak month), May 2020 (non-peak month), March 2020 (random month) were reviewed.	
C: Are there different legal minimum wage grades? If Yes , please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	C1: If Yes , please give details: N/A
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	D1: If No , please give details: N/A

<p>E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?</p>	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	<p>E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> Since January 1st, 2020: 2.943,00 TL (Gross-including subsistence allowance); 2.324,70TL (Net- including subsistence allowance).</p>	
<p>F: Please indicate the breakdown of workforce per earnings:</p>	<p>F1: <u>0</u>% of workforce earning under minimum wage F2: <u>23</u>% of workforce earning minimum wage F3: <u>77</u>% of workforce earning above minimum wage</p>		
<p>G: Bonus Scheme found: Please specify details:</p>	<p>Bonus Scheme found: No bonus payment was done. <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i></p>		
<p>H: What deductions are required by law e.g. social insurance? Please state all types:</p>	<p>Social insurance and taxes</p>		
<p>I: Have these deductions been made?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>I1: Please list all deductions that have been made.</p>	<p>1. Tax 2. Social insurance Please describe: Legal deductions</p>
		<p>I2: Please list all deductions that have not been made.</p>	<p>1. Food 2. Transportation Please describe: Meal is provided free of charge to all employees. Transportation allowances are monthly paid to employees</p>
<p>J: Were appropriate records available to verify hours of work and wages?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No For catering employees: Please refer to NC#10		
<p>K: Were any inconsistencies found? (if yes describe nature)</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>K1: Type N/A <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:</p>	
<p>L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>L1: Please give details: Employees' working hours are recorded by electronic time recording system. Catering employees are not included the time recording system. For catering employees: Please refer to NC#10.</p>		

<p>M: Is there a defined living wage: 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.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time: N/A</p>
<p>M2: If yes, what was the calculation method used.</p>	<p><input type="checkbox"/> ISEAL/Anker Benchmarks N/A <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:</p>
<p>N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: Please give details: N/A</p>
<p>O: Are workers paid in a timely manner in line with local law?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>P: Is there evidence that equal rates are being paid for equal work:</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: It was confirmed through employee and management interviews and documents review, equal rates are paid for equal work.</p>
<p>Q: How are workers paid:</p>	<p><input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain:</p>

6: Working Hours are not Excessive

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

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

ETI

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

Working hours are:

From 08:00 to 18:30 (including 60 minutes lunch break, 2x15 minutes tea break) x 5 days

Totally: 45 hours/ week.

Working hours for young employees are:

From 08:00 to 18:30 (including 60 minutes lunch break, 2x45 minutes tea break) x 5 days

Totally: 40 hours/ week.

Time recording System: Card scanning time recording system.

Catering employees are not included the time recording 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' attendance records and payroll records of July 2020 (last paid and peak month), May 2020 (non-peak month), March 2020 (random month) were reviewed.
Interviews were conducted with employees and management.

Any other comments:

None

Non-compliance:

11. Description of non-compliance:

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

There are 2 contractor employees (BEYAZ SAYFA BERCESTE YEMEK) for catering services. It was noted that there were no working hours records (normal + overtime) for catering employees at the facility. So these employees working hours (normal + overtime) and payments could not be verified. Contractor employees are %30 of the total employees.

Local law and/or ETI requirement:

In accordance with the Turkish Regulation on Working Hours Related to Labor Law, No: 25425, Date: 06.04.2004, Art. 9; The employer should document the working hours of employees appropriately.

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.

Recommended corrective action:

It is recommended to provide all employees include time record system and keep records.

Objective evidence observed:

11-Employee interview, Management interview, Document review

Observation:

Description of observation: None observed

Local law or ETI requirement: Not applicable

Comments: Not applicable

Objective evidence observed:

Not applicable

Good Examples observed:

Description of Good Example (GE): None observed	Objective Evidence Observed: Not applicable
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Working hours' analysis Please include time e.g. hour/week/month (Go back to Key information)					
Systems & Processes					
A. What timekeeping systems are used: time card etc.	Describe: Electronic time recording system (card scanning)				
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details				
C: Are standard/contracted working hours defined in all contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details: N/A			
D: Are there any other types of contracts/employment agreements used?	<input 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:	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			

	For catering employees: Please refer to NC#10	
	Maximum number of days worked without a day off (in sample):	
	5 DAYS For catering employees: Please refer to NC#11	
Standard/Contracted Hours worked		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No For catering employees: Please refer to NC#11	G1: If yes, % of workers & frequency:
		N/A
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A	H1: If yes, please give details:
		N/A
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 0 Hours/ Month in July 2020 (last paid and peak month), 0 Hours/ Month in May 2020 (non-peak month) 0 Hours/ Month in March 2020 (random month) For catering employees: Please refer to NC#11	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No For catering employees: Please refer to NC#11	
K: Approximate percentage of total workers on highest overtime hours:	__0__%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Employees' interviews

Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium For catering employees: Please refer to NC#10 and NC#11	M1: Please give details of normal day overtime premium as a % of standard wages: 150% for overtime in weekdays and weekends. Overtime premium for national/religious holidays is 200%
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No For catering employees: Please refer to NC#10 and NC#11	N1: If yes, please describe % of workers & frequency: All employees who work overtime is paid monthly in accordance with the law.
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.	<input type="checkbox"/> No N/A <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other For catering employees: Please refer to NC#10 and NC#11	
	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other	
	N/A	
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> Overtime is voluntary N/A <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify)	
	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:	
	None	

<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<p> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: If yes, please give details: </p>
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<p> <input type="checkbox"/> Yes N/A <input type="checkbox"/> No </p>

7: No Discrimination is Practiced

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

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

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

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

Details:

Personnel files

Pay slips

Disciplinary policy

Company social compliance policy

Employee interview

Any other comments:

NONE

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: <u>30</u> % A2: Female <u>70</u> %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	2 (1 food engineer, 1 graphic designer)
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?

Based on employee interviews, management interviews and document review it was identified that, all employees are trained about health and safety, facility rules, disciplinary rules. Discrimination policy and procedure training are given to employees.

B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?

☒ Yes
☐ No

If no, please give details: N/A

Non-compliance:

Description of non-compliance:

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

None Observed

Local law and/or ETI requirement: Not applicable

Recommended corrective action: Not applicable

Objective evidence observed:

Not applicable

Observation:

Description of observation: None Observed

Local law or ETI requirement: Not applicable

Comments: Not applicable

Objective evidence observed:

Not applicable

Good Examples observed:

Description of Good Example (GE):

None Observed

Objective Evidence Observed:

Not applicable

8: Regular Employment Is Provided

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

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

ETI

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current systems:

Employees' labour contracts were available in their personnel files.

Labour contracts were in accordance with the laws and regulations.

A copy of employment contract was given to employees.

All employees were registered to the social security.

Employees are not required to sign blank papers.

No temporary worker, apprenticeship schemes or home worker was identified by the auditors.

There is 1 contractor at the facility:

1. Beyaz Sayfa Berceste Yemek Hizmetleri San. ve Tic. Ltd. Sti. for catering services.

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

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

Management & Employees' interviews.

Any other comments:

None

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

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

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

Responsible Recruitment

All Workers	
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?	<input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions A1: If any are unchecked, please describe finding and specific category(ies) of workers affected: N/A
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please describe details and specific category(ies) of workers affected: N/A

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

Migrant Workers: <i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i>		
A: Type of work undertaken by migrant workers:	There are 2 production migrant workers.	
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: None B2: Total number of (outside of local country) recruitment agencies used: None	
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: NA	C2: Observations: The migrant workers enjoy working at this facility, they said that they had a good relationship with management. Also, the employees declared that, working hours are comfortable.
D: Are Any migrant workers in skilled, technical, or management roles Migrant Workers (this should include all migrant workers including permanent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: If yes, number and example of roles:	

workers, temporary and/or seasonal workers)

NON-EMPLOYEE WORKERS

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

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.)	
A: Number of agencies used (average):	A1: Names if available: N/A- There was no agency worker.
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes N/A <input type="checkbox"/> No
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes N/A <input type="checkbox"/> No

D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes N/A <input type="checkbox"/> No 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 N/A <input type="checkbox"/> No E1: Please give details:

Contractors: <i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i>	
A: Any contractors on site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: If yes, how many contractors are present, please give details: There is 1 contractor at the facility: 1.Beyaz Sayfa Berceste Yemek Hizmetleri San. ve Tic. Ltd. Sti. for catering services.
B: If Yes , how many workers supplied by contractors?	2 employees (1 male, 1 female) from Beyaz Sayfa Berceste Yemek Hizmetleri San. ve Tic. Ltd. Sti. for catering services.
C: Do all contractor workers understand their terms of employment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: All contractor workers know their terms of employment.
D: If Yes , please give evidence for contractor workers being paid per law:	Payroll records, personal files.

8A: Sub-Contracting and Homeworking

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

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

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

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

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems:

The facility uses 1 sub-contractor.

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

Details:

Production records
Management interview
Employee interview
Document Review

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

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

Process Subcontracted	CHROME PLATING
Name of factory	CAVUS KROMAJ-SATILMIS DEMIR
Address	Ikiteili Organize San. Bolg. Galvano Teknik San. Sit. F2 Blok No: 30 Basaksehir/Istanbul/TURKEY

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

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

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

Summary of sub-contracting – if applicable <input 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please describe: The auditor made a calculation to identify any possible unrecorded work hours or undeclared sub-contracting.
B: If sub-contractors are used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If Yes , summarise details:
C: Number of sub-contractors/agents used:	1
D: Is there a site policy on sub-contracting?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please refer to OBS#1 and OBS#2 D1: If Yes , summarise details:

E: What checks are in place to ensure no child labour is being used and work is safe?	The facility performs visits to their sub-contractors.
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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: N/A. No homeworking is used.		
B: Number of homeworkers	B1: Male: N/A	B2: Female: N/A	Total: N/A
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents N/A. No homeworking is used.		C1: If through agents, number of agents: N/A. No homeworking is used.
D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A. No homeworking is used.		
E: How does the site ensure worker hours and pay meet local laws for homeworkers?	N/A. No homeworking is used.		
F: What processes are carried out by homeworkers?	N/A. No homeworking is used.		
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: N/A. No homeworking is used.		
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A. No homeworking is used.		

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

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 3 rd party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: There are published, anonymous and/or open channels available for reporting any violations of Labour standards. The employees can report to the legal authorities. There is suggestion box, and an internal confidential email address for reporting grievances.
B: If Yes , are workers aware of these channels and have access? Please give details.	Workers are aware of these channels. There are published, anonymous and/or open channels available for reporting any violations of Labour standards
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Suggestion box, employee representative, open door policy
D: Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Workers <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input type="checkbox"/> Other D1: Please give details: There is grievance mechanism.
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details N/A
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)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: If no, please give details
G: Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain
H: If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: If no, please give details

I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No I1: If yes, please give details
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<p align="center">Current Systems and Evidence Examined</p> <p><i>To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.</i></p> <p>Current systems: There was no evidence of any physical abuse or discipline, the threat of physical abuse, sexual or any other types of harassment or verbal abuse as well as any other forms of intimidation were not noted, as confirmed by the interviews. Disciplinary regulation was compliant with the legal regulations. No disciplinary action was taken.</p> <p>Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate): Details: Disciplinary regulation of the facility and the personnel files of the sampled employees were reviewed. Suggestion boxes check book was checked. Employee interview was conducted The relevant policy on prevention of harassment and abuse Internal grievance procedure documentation. Training records</p> <p>Any other comments: None</p>
--

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

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

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

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

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

Additional Elements

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

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

Current Systems and Evidence Examined

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

Current systems:

There are 2 migrant workers who have working permit and labor contract.

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

Details:

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

Any other comments: None

Non-compliance:

Description of non-compliance:

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

None Observed

Local law and/or ETI requirement: Not applicable

Recommended corrective action: Not applicable

Objective evidence observed:

Not applicable

Observation:

Description of observation: None Observed

Local law or ETI requirement: Not applicable

Comments: Not applicable

Objective evidence observed:

Not applicable

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

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

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

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

B.4. Compliance Requirements

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

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

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

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

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

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

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

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

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

B4. Guidance for Observations

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

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

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

Current Systems and Evidence Examined

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

Current systems:

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

The facility has environmental policy

There is an environmental procedure in the facility.

The facility does not have an exemption letter or environmental permit.

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

All related Environment Documents were examined.

Details:

Facility tour was conducted.

Document review was conducted.

Management Interview
Monthly assessment reports

Any other comments:

Non-compliance:

12. Description of non-compliance:

☒ NC against ETI/Additional Elements

☒ NC against Local

☐ NC against customer code:

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

Local law and/or ETI/Additional Elements requirement:

Environmental Permit and License Regulation(10.09.2014)

Article 5

(1)Facilities subject to environment permit or to environment permit and license are classified on Appendix-1 and Appendix-2 regarding to their impact to environment;

(2)The facilities on Appendix-1 and Appendix-2, must provide temporary environmental permit to operate their business.

(3)The facilities that take temporary environmental permit, must get the environmental permit or environmental permit and license in 1 year after the date that temporary environmental permit was taken.

ETI;

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

Recommended corrective action:

It is recommended to provide environment permit or environment out of scope letter.

Objective evidence observed:

12- Document Review,
Management
Interviews

13. Description of non-compliance:

☒ NC against ETI/Additional Elements

☐ NC against Local

☐ NC against customer code:

There was no environment impact assessment in the facility.

Local law and/or ETI/Additional elements requirement:

ETI;

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

Recommended corrective action:

Please provide environment impact assessment.

13- Document Review,
Management
Interviews

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

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

Environmental Analysis <i>(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)</i>	
A: Is there a manager responsible for Environmental issues (Name and Position):	ECEM TUGCE SUREN - ENVIRONMENTAL CONSULTANT / ENVIRONMENT ENGINEER Facility has a contract with the environment engineer.
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: Please give details: Please refer to NC#13
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: N/A
D: Does the site have an Environmental policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, is it publicly available? Environmental policy was available. It was posted on notice board and shared on website.
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: In the environmental policy it is addressed the key impacts from their operations and their commitment to improvement.
F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please give details. <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: N/A
H: Have all legally required permits been shown? Please give details.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H1: Please give details: Please refer to NC#12
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A I1: Please give details: The records were kept.
J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Client's requirements and legislation in the destination were followed and implemented as per the instructions.

K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Facility has policies for reduction in the environmental aspects.	
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: The records for wastes handled to authorized recycling companies are available	
M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: The facility monitors consumption of water, energy and natural resources.	
N: Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Supplier selection and approval procedure includes environmental issues.	
Usage/Discharge analysis		
Criteria	Previous year: Please state period: 2019	Current Year: Please state period: 2020
Electricity Usage: Kw/hrs	N/A	1200 Kw/hrs
Renewable Energy Usage: Kw/hrs	N/A	N/A
Gas Usage: Kw/hrs	N/A	420 Kw/hrs
Has site completed any carbon Footprint Analysis?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If Yes , please state result	N/A	N/A
Water Sources: Please list all sources e.g. lake, river, and local water authority.	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> ISKI Tap Water
Water Volume Used: (m³)	N/A	350 m³
Water Discharged: Please list all receiving waters/recipients.	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> Drainage
Water Volume Discharged: (m³)	N/A	Not Provided
Water Volume Recycled: (m³)	N/A	Not Provided

Total waste Produced (please state units)	N/A	Not Provided
Total hazardous waste Produced: (please state units)	N/A	Not Provided
Waste to Recycling: (please state units)	N/A	Not Provided
Waste to Landfill: (please state units)	N/A	Not Provided
Waste to other: (please give details and state units)	N/A	Not Provided
Total Product Produced (please state units)	N/A	150.000 – 200.000 pcs

10C: Business Ethics – 4-Pillar Audit

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

To be completed for a 4-Pillar SMETA Audit

10C. Compliance Requirements

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

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

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

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

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

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

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

10C. Guidance for Observations

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

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

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

Current Systems and Evidence Examined

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

Current systems:

The facility conducts their business ethically without bribery, corruption, or any type of fraudulent Business Practice.

Businesses meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.

The facility has a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter

The facility has a designated person responsible for implementing standards concerning Business Ethics, MEHMET YAVUZ YUKSEL / SOCIAL COMPLIANCE RESPONSIBLE

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

Details:

Document review

Employee and management interview

Non-compliance:	
<p>14. Description of non-compliance:</p> <p><input checked="" type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local</p> <p><input type="checkbox"/> NC against customer code:</p> <p>There is no notification mechanism for reporting unethical issues in the business, in a way that safeguards the safety of the Reporting Person.</p> <p>Local law and/or ETI requirement:</p> <p>ETI; 10C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.</p> <p>Recommended corrective action:</p> <p>Please provide the related mechanism. the reporter</p>	<p>Objective evidence observed: (where relevant please add photo numbers)</p> <p>14- Document Review, Management Interviews</p>
<p>15. Description of non-compliance:</p> <p><input checked="" type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local</p> <p><input type="checkbox"/> NC against customer code:</p> <p>Staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are not trained on what action to take in the event of an issue arising in their area.</p> <p>Local law and/or ETI/Additional Elements requirement:</p> <p>ETI; 10C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area</p> <p>Recommended corrective action:</p> <p>Please provide training to related staffs</p>	<p>15- Document Review, Management Interviews</p>

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

Good examples observed:

Description of Good Example (GE): None Observed

Objective Evidence Observed:
Not applicable

<p>A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?</p>	<p><input checked="" type="checkbox"/> Internal Policy <input checked="" type="checkbox"/> Policy for third parties including suppliers</p> <p>A1: Please give details:</p> <p>The facility has a Business Ethics Policy and the policy was communicated and applied internally, externally.</p>
<p>B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>B1: Please give details:</p> <p>Please refer to NC#15</p>
<p>C: Is the policy updated on a regular (as needed) basis?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>C1: Please give details:</p> <p>The management stated that the policy was updated on a regular (as needed) basis.</p>
<p>D: Does the site require third parties including suppliers to complete their own business ethics training</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>D1: Please give details: There is no training requirement for third parties.</p>

Other findings

Other Findings Outside the Scope of the Code
NONE

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

Appendix 1

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

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

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

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

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

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

10C. Compliance Requirements

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

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

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

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

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

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

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

10C. Guidance for Observations

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

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

Photo Form

Outside view of the facility	Emergency Exit Door	Evacuation Plan
Fire Alarm Button	First Aid Box	Electricity Panel with Isolated matt
Fire Hose Cabinet	Fire Extinguisher	Evacuation signs



Lockers



Toilets



Time recording machine



Suggestion box



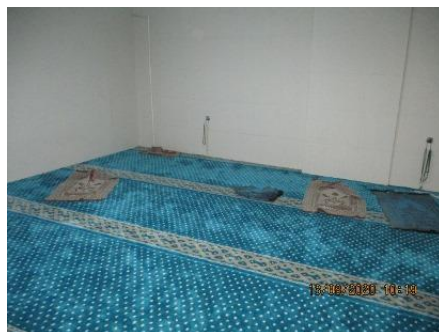
Potable water



Kitchen



Lunch hall



Praying area



Doctor room



Production area





Moulder milling machine



Eccentric presses

Point welding machines	CNC wire bending machines	Electrostatic paint plant
Packing	Warehouse	Aisles
Smoke detector	Hand sanitizer	NC#2: Emergency exit door of the shipping area was opening inwards in the company.

NC#2: Emergency exit door of the lunch hall was opening inwards in the company.	NC#2: Emergency exit door of the man changing room was opening inwards in the company.	NC#3 Emergency directions do not point the emergency exits in the right direction in the evacuation plans in the company.
		NA
NC#5: No secondary containment was provided for chemicals such as solvent in the production area.	NC#9: It was noted that there was no machine guard (pulley) for 2 presses used in production.	NA

DISCLAIMER:

"This report is for the exclusive use of the client of Intertek named in this report ("**Client**") and is provided pursuant to an agreement for services between Intertek and Client ("**Client Agreement**"). This report provides a summary of the findings and other applicable information found/gathered during the audit conducted at the specified facilities on the specified date only. Therefore, this report does not cover, and Intertek accepts no responsibility for, other locations that may be used in the supply chain of the relevant product or service. Further, as the audit process used by Intertek is a sampling exercise only, Intertek accepts no responsibility for any non-compliant issues that may be revealed relating to the operations of the identified facility at any other date. Intertek's responsibility and liability are also limited in accordance to the terms and conditions of the Client Agreement. Intertek assumes no liability to any party, for any loss, expense or damage occasioned by the use of this information other than to the Client and in accordance with the Client Agreement and these disclaimers. The disclaimer should be read in conjunction with the Terms and Conditions of Intertek."

End of report.



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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

[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>




SMETA Corrective Action Plan Report (CAPR)

Version 6.1



Audit Details			
Sedex Company Reference: (only available on Sedex System)	ZC: Firma Sedex üyesi değildir. / The facility is not a Sedex member.	Sedex Site Reference: (only available on Sedex System)	ZS: Firma Sedex üyesi değildir. / The facility is not a Sedex member.
Business name (Company name):	OKYANUS MUTFAK ESYALARI SAN. VE DIS. DIC. LTD. STI.		
Site name:	OKYANUS MUTFAK ESYALARI SAN. VE DIS. DIC. LTD. STI.		
Site address: (Please include full address)	İkitelli OSBM ah. Eski Turgut Ozal Cad. No: 4 B Blok No: 105-105/A Basaksehir / Istanbul	Country:	TURKEY / TURKIYE
Site contact and job title:	NECLA BUYUK – KALITE YONETIM SISTEMI TEMSILCISI / QUALITY MANAGEMENT SYSTEM REPRESENTATIVE		
Site phone:	+90 532 404 8137	Site e-mail:	kys@okyanushome.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar <input checked="" type="checkbox"/> Business Ethics
Date of Audit:	13.08.2020		

Audit Company Name & Logo: 	Report Owner (payer): (If paid for by the customer of the site please remove for Sedex upload) OKYANUS MUTFAK ESYALARI SAN. VE DIS. DIC. 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):

Şirketin Ocak 2020'de kurulduğundan dolayı, zaman ve ödeme kayıtları Ocak 2020 itibarıyla gözden geçirilmiştir.

4-pillar denetimi özel gerekliliği gereği, ek olarak sosyal uygunluk sorumlusu ile, 4-pillar çevre gereklilikleri ve iş etiği konularında görüşülmüştür.

Covid-19 salgını sorunu nedeniyle grup görüşmesi kapsam dışında bırakılmıştır, ve sadece bireysel çalışan görüşmesi yapılmıştır, grup görüşmeleri yapılmamıştır.

/ Due to the company was established in January 2020, time and payment records have been reviewed as of January 2020.

The social compliance responsible were interviewed additionally regarding environmental 4-pillar requirements and business ethics issues due to special requirement of 4-pillar audit. Because of Covid-19 epidemic issue, group interview was out of scope employee interviews were performed only as individual interviews, and no group interviews were conducted

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

Lead auditor: SEVINC YILDIRIM (RA) - Auditor

Team auditor: SEDA TURK (RA) - Auditor

Interviewers: SEDA TURK

Report writer: SEVINC YILDIRIM (RA)

Report reviewer: RAMA RAO(Reviewer)

Date of declaration: 13.08.2020

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

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

affords the greater protection. The ownership of this report remains with the party who has paid for the audit. Release permission must be provided by the owner prior to release to any third parties.

Audit Parameters

Audit Parameters			
A: Time in and time out	Day 1 Time in: 09:00 Day 1 Time out: 17:00	Day 2 Time in: NA Day 2 Time out: NA	Day 3 Time in: NA Day 3 Time out: NA
B: Number of auditor days used:	2 DENETÇİ X 1 GÜN / 2 AUDITORS X 1 DAY (1.5 MAN DAY)		
C: Audit type:	<input checked="" type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define:		
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 2 weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If No, why not The facility is not member of the Sedex		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	NECLA BUYUK – KALITE YONETIM SISTEMI TEMSILCISI / QUALITY MANAGEMENT SYSTEM REPRESENTATIVE		
H: Is further information available (if yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	NA		
J: Previous audit type:	NA		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No NA		

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

B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	There was no worker committee at the facility. There were 2 worker representatives at the facility. 1 worker representative was included in employee interviews. / İşletmede çalışan komitesi bulunmamaktadır. İşletmede 2 çalışan temsilcisi vardır. 1 çalışan temsilcisi çalışan görüşmelerine dahil edilmiştir.		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	N/A. İşletmede sendika bulunmamaktadır / There is no union in the facility.		

Guidance

The Corrective Action Plan Report summarises the site audit findings and a corrective, and preventative action plan that both the auditor and the site manager believe is reasonable to ensure conformity with the ETI Base Code, Local Laws and additional audited requirements. After the initial audit, the form is used to 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>
IS SAGLIGI VE GUVENLIGI NO:3 ETI, YK #1	YENI	İşletmede bulunan 1 genç çalışanın periyodik sağlık muayene raporlarının tarihi geçmiştir.(son rapor tarihi:27.01.2020)	<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:	Genç çalışanlar için en geç 6 ay da bir periyodik sağlık muayenesi yaptırılmalıdır	30 GUN / DAYS	MASAUSTU INCELEME	EVET/YES NECLA BUYUK – KALITE YONETIM SISTEMI TEMSILCISI / QUALITY MANAGEMENT SYSTEM REPRESENTATIVE		
HEALTH AND SAFETY NO:3 ETI, LL #1	NEW	Periodical health checks reports of 1 young employee was expired in the company (last report date :27.01.2020)		Periodical health check shall be at least every 6 months for young employees.		DESKTOP REVIEW			
IS SAGLIGI VE GUVENLIGI NO:3 ETI, YK #2	YENI	İşletmede sevkiyat acil çıkış kapısı, yemekhane acil çıkış kapısı , erkek soyunma odası acil çıkış kapısı içeri doğru açılmaktadır.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	Lütfen , Tüm acil çıkış kapıları dışarı yönde açılmasını sağlayınız.	30 GUN/ DAYS	TAKIP DENETİMİ	EVET/YES NECLA BUYUK – KALITE YONETIM SISTEMI TEMSILCISI / QUALITY MANAGEMENT SYSTEM REPRESENTATIVE		

HEALTH AND SAFETY NO:3 ETI, LL #2	NEW	Emergency exit door of the shipping area , emergency exit door of the lunch hall and emergency exit door of the man changing room were opening inwards in the company.		It is recommended All emergency exit doors should be opened outwards direction.		FOLLOW UP AUDIT			
IS SAGLIGI VE GUVENLIGI NO:3 ETI, YK #3	YENI	İşletmede bulunan tahliye planlarında, acil yönlendirmeler acil çıkışları doğru yönde göstermemektedir.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	Lütfen , tahliye planlarında yer alan acil yönlendirmelerin acil çıkışları doğru yönlendirmesini sağlayınız.	30 GUN/ DAYS	TAKIP DENETİMİ	EVET/YES NECLA BUYUK – KALITE YONETIM SISTEMI TEMSILCISI / QUALITY MANAGEMENT SYSTEM REPRESENTATIVE		
HEALTH AND SAFETY NO:3 ETI, LL #3	NEW	Emergency directions do not point the emergency exits in the right direction in the evacuation plans in the company.		Please ensure that the emergency directions included in the evacuation plans direct the emergency exits correctly.		FOLLOW UP AUDIT			
SAGLIK VE GUVENLIK No:3 YK, ETI #4	YENI	İşletmede göz duşu bulunmamaktadır	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	Lütfen göz duşu sağlayınız	30 GUN / DAYS	TAKIP DENETİMİ	EVET/YES NECLA BUYUK – KALITE YONETIM SISTEMI TEMSILCISI / QUALITY MANAGEMENT SYSTEM REPRESENTATIVE		
HEALTH AND SAFETY No:3 LL, ETI #4	NEW	It was noted that there was no eye wash station at the facility.		It is recommended to provide eye wash station.		FOLLOW UP AUDIT			
SAGLIK VE GUVENLIK No:3	YENI	İşletmede üretim alanında bulunan solvent gibi kimyasallar	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs	Lütfen işletmede bulunan tüm kimyasallar için	30 GUN / DAYS	TAKIP DENETİMİ	EVET/YES		

YK, ETI #5	HEALTH AND SAFETY No:3 LL, ETI #5	NEW	için kincil kap sağlanmamıştır.	<input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	taşma kaplarını uygun hacim ve formda sağlayınız.		FOLLOW UP AUDIT	NECLA BUYUK – KALITE YONETİM SİSTEMİ TEMSİLCİSİ / QUALITY MANAGEMENT SYSTEM REPRESENTATIVE		
SAGLIK VE GUVENLIK No:3 YK, ETI #6	HEALTH AND SAFETY No:3 LL, ETI #6	YENI NEW	İşletme tehlikeli sınıfta yer almaktadır ve 4 ilkyardım sertifikalı çalışan bulunmaktadır, ancak en az 1 kişiye daha ihtiyaç vardır.	<input checked="" type="checkbox"/> Training <input type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	Lütfen her 15 kişi için 1 ilk yardım sertifikalı çalışan sağlayınız.	30 GUN / DAYS	MASAUSTU INCELEME DESKTOP REVIEW	EVET/YES NECLA BUYUK – KALITE YONETİM SİSTEMİ TEMSİLCİSİ / QUALITY MANAGEMENT SYSTEM REPRESENTATIVE		
SAGLIK VE GUVENLIK No:3 YK, ETI #7	HEALTH AND SAFETY No:3 LL, ETI #7	YENI NEW	İşletmede yangın söndürme (su ile çalışan) sistemine ait periyodik muayene raporu bulunmamaktadır.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	Lütfen uygun sonucu olan yangın söndürme sistemine ait periyodik muayene raporunu sağlayınız.	30 GUN/ DAYS	MASAUSTU INCELEME DESKTOP REVIEW	EVET/YES NECLA BUYUK – KALITE YONETİM SİSTEMİ TEMSİLCİSİ / QUALITY MANAGEMENT SYSTEM REPRESENTATIVE		

SAGLIK VE GUVENLIK No:3 YK, ETI #8	YENI	Havalandırma tesisatı için fenni muayene raporu yoktur.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	Lütfen havalandırma tesisatı için fenni muayene raporu sağlayınız.	30 GUN / DAYS	MASAUSTU	EVET/YES		
HEALTH AND SAFETY No:3 LL, ETI #8	NEW	There is no periodical inspection report for ventilation system.		It is recommended to provide periodical inspection report for ventilation system.		DESKTOP	NECLA BUYUK – KALITE YONETIM SISTEMI TEMSILCISI / QUALITY MANAGEMENT SYSTEM REPRESENTATIVE		
SAGLIK VE GUVENLIK No:3 YK, ETI #9	YENI	Üretimde kullanılan 2 pres için makina koruyucu (kasnak) olmadığı görülmüştür.		Lütfen ilgili makina koruyucularını sağlayınız.	30 GUN/ DAYS	MASAUSTU	EVET/YES		
HEALTH AND SAFETY No:3 LL, ETI #9	NEW	It was noted that there was no machine guard (pulley) for 2 presses used in production.		Please provide the relevant machine protectors.		DESKTOP	NECLA BUYUK – KALITE YONETIM SISTEMI TEMSILCISI / QUALITY MANAGEMENT SYSTEM REPRESENTATIVE		
ÖDEMELER VE HAKLAR NO:5 ETI, YK #10	YENI	İşletmede yemek hizmeti için 2 taşeron işçi bulunmaktadır (BEYAZ SAYFA BERCESTE YEMEK) İşletmede yemekhane çalışanları için çalışma saatleri (normal + fazla mesai) kayıt altına alınmamaktadır. Bu nedenle, bu çalışanlara ait çalışma süreleri (normal+ fazla mesai) ve ödemeler doğrulanamamıştır.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	Lütfen tüm çalışanların zaman kayıt sistemine dahil olmasını sağlayınız ve kayıt altında tutunuz.	60 GUN/ DAYS	TAKIP DENETİMİ	EVET/YES		
							NECLA BUYUK – KALITE YONETIM SISTEMI TEMSILCISI / QUALITY MANAGEMENT SYSTEM REPRESENTATIVE		

WAGE AND BENEFITS NO:5 ETI, LL #10	NEW	Taşeron çalışanlar toplam çalışanların %3'üdür. There are 2 contractor employees (BEYAZ SAYFA BERCESTE YEMEK) for catering services. It was noted that there were no working hours records (normal + overtime) for catering employees at the facility. So these employees working hours (normal + overtime) and payments could not be verified. Contractor employees are %3of the total employees.		It is recommended to provide all employees include time record system and keep records.		FOLLOW UP AUDIT			
ÇALIŞMA SAATLERİ NO:6 ETI, YK #11	YENİ	İşletmede yemek hizmeti için 2 taşeron işçi bulunmaktadır (BEYAZ SAYFA BERCESTE YEMEK) İşletmede yemekhane çalışanları için çalışma saatleri (normal + fazla mesai) kayıt altına alınmamaktadır. Bu nedenle, bu çalışanlara ait çalışma süreleri (normal+ fazla mesai) ve ödemeler doğrulanamamıştır. Taşeron çalışanlar toplam çalışanların %3'üdür.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	Lütfen tüm çalışanların zaman kayıt sistemine dahil olmasını sağlayınız ve kayıt altında tutunuz.	60 GÜN/DAYS	TAKIP DENETİMİ	EVET/YES NECLA BUYUK – KALITE YONETIM SİSTEMİ TEMSİLCİSİ / QUALITY MANAGEMENT SYSTEM REPRESENTATIVE		

WORKING HOURS NO:6 ETI, LL #11	NEW	There are 2 contractor employees (BEYAZ SAYFA BERCESTE YEMEK) for catering services. It was noted that there were no working hours records (normal + overtime) for catering employees at the facility. So these employees working hours (normal + overtime) and payments could not be verified. Contractor employees are %30 of the total employees.		It is recommended to provide all employees include time record system and keep records.		FOLLOW UP AUDIT			
ÇEVRE 4 PILLAR NO:10B.4 YK, ETI #12	YENI	İşletmede çevre izni veya çevre izni kapsam dışı yazısı yoktur.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	Lütfen çevre izni veya çevre izni kapsam dışı yazısı sağlayınız	180 GUN/ DAYS	MASAUSTU İNCELEME	EVET/YES NECLA BUYUK – KALITE YONETIM SISTEMI TEMSILCISI / QUALITY MANAGEMENT SYSTEM REPRESENTATIVE		
ENVIRONMENT 4 PILLAR NO:10B.4 LL, ETI #12	NEW	It was noted that there was no environment permit or environment out of scope letter in the facility.		It is recommended to provide environment permit or environment out of scope letter.		DESKTOP REVIEW			
CEVRE 4 PILLAR NO:10B.4 PILLAR ETI, LL #13	YENI	İşletmede çevre boyut analizi yoktur.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	Lütfen çevre boyut analizi sağlayınız.	30 GUN/ DAYS	MASAUSTU İNCELEME	EVET/YES NECLA BUYUK – KALITE YONETIM SISTEMI TEMSILCISI /		

ENVIRONMENT 4 PILLAR NO:10B.4 ETI, LL #13	NEW	There was no environment impact assessment in the facility.		Please provide environment impact assessment.		DESKTOP REVIEW	QUALITY MANAGEMENT SYSTEM REPRESENTATIVE		
IS ETIGI NO:10C.4 ETI #14	YENI	Etik olmayan konuların bildirimine ilişkin, raporlayan kişinin güvenliğini koruyacak şekilde, bir bildirim mekanizması bulunmamaktadır.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	Lütfen ilgili mekanizmayı oluşturunuz.	30 GUN/ DAYS	MASAUSTU INCELEME	EVET/YES NECLA BUYUK – KALITE YONETIM SISTEMI TEMSILCISI / QUALITY MANAGEMENT SYSTEM REPRESENTATIVE		
BUSINESS ETHICS NO:10C.4 ETI #14	NEW	There is no notification mechanism for reporting unethical issues in the business, in a way that safeguards the safety of the Reporting Person.		Please provide the related mechanism. the reporter		DESKTOP REVIEW			
IS ETIGI NO:10C.7 ETI #15	YENI	Aldığı görev itibarıyla etik iş uygulamaları konusunda daha yüksek risk sınıfında yer alan satış, satın alma, lojistik, pazarlama gibi departmanların çalışanlarına, konu ile ilgili bir duruma maruz kaldıklarında yapmaları gereken uygulamalar ile ilgili bir eğitim verilmemiştir.	<input checked="" type="checkbox"/> Training <input type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	Lütfen ilgili kişilere eğitim sağlayınız.	30 GUN/ DAYS	MASAUSTU INCELEME	EVET/YES NECLA BUYUK – KALITE YONETIM SISTEMI TEMSILCISI / QUALITY MANAGEMENT SYSTEM REPRESENTATIVE		

BUSINESS ETHICS NO:10C.7 ETI #15	NEW	Staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are not trained on what action to take in the event of an issue arising in their area.		Please provide training to related staffs.		DESKTOP REVIEW			
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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>
Evrensel Haklar 0.A	YENİ	İşletme tarafından kullanılan paydaşlarınızı (fason ve tedarikçil) tanımlaması (haritalaması) yapılmamıştır.	Farkındalık	Lütfen tüm paydaşlarınızı içeren bir haritalama yapınız.
Universal Rights covering UNGP 0.A #1	NEW	Stakeholder (Subcontractor/ suppliers mapping) are not defined that are used by the facility.	Awareness	Please map your all stakeholders.
Evrensel Haklar 0.A	YENİ	İşletmede paydaş etki analizi (paydaşların insan hakları üzerindeki direk, dolaylı ve potansiyel etkilerinin değerlendirilmesi) yapılmamıştır.	Farkındalık	Lütfen paydaş etki analizini yapınız.
Universal Rights covering UNGP 0.A	NEW	The facility does not measure the direct, indirect and potential impact on its stakeholders' human rights	Awareness	Please measure the direct, indirect and potential impact on its stakeholders' human rights

#2				
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Good examples

Good example Number <i>The reference number of the good example from the Audit Report, for example, Discrimination No.7</i>	Details of good example noted	Any relevant Evidence and Comments
ODEMELER VE HAKLAR / WAGES AND BENEFITS NO: 5 #1	Meal is provided free of charge to all employees. / Yemek tüm çalışanlara ücretsiz sağlanmaktadır.	Employee & Management Interviews, Document Review Çalışan ve Yönetim Görüşmeleri
ODEMELER VE HAKLAR / WAGES AND BENEFITS NO: 5 #2	Transportation allowances are monthly paid to employees. / Çalışanlara aylık olarak yol ücreti ödenmektedir.	Employee & Management Interviews, Document Review Çalışan ve Yönetim Görüşmeleri

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:	NECLA BAYRAK MUTFAK EŞYALARI SAN. VE DİŞ. TİC. LTD. ŞTİ. İmza: C. S. U. Mutfa Eşyaları Ltd. Şti. No: 491151521 Göğsü YD - 640161521 Tel: 0212 369 77 05	Title KALITE YONETİM SİSTEMİ TEMSİLDİCİ / QUALITY MANAGEMENT SYSTEM REPRESENTATIVE Date 13.08.2020
B: Auditor Signature:	SEVINC YILDIRIM SEDA TURK	Title LEAD AUDITOR TEAM AUDITOR Date 13.08.2020
C: Please indicate below if you, the site management, dispute any of the findings. No need to complete D-E, if no disputes.		
D: I dispute the following numbered non-compliances: YOKTUR/ NONE		
E: Signed: (If <u>any</u> entry in box D, please complete a signature on this line)	N/A	Title N/A Date N/A
F: Any other site Comments: YOKTUR/ NONE		

Guidance on Root Cause

Explanation of the Root Cause Column

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

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

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

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

Some examples of finding a “root cause”

Example 1

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

Example 2

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

Example 3

A site uses fines to control unacceptable behaviour of workers.

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

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

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

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

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

Disclaimer

Any proposed Corrective Action Plan (CAP) closed utilizing a Desktop Review is limited by the evidential documentation provided by the facility in order to correct the non-compliance. The intent of this service is to provide assurance that the facility is on the correct path with its proposed or completed corrective actions. Intertek cannot be held responsible for the falsification of evidence or the effective implementation of the proposed corrective actions, which in many instances may only be truly validated by an onsite Audit visit owing to the limitations of the desktop review process. The facilities shall be wholly responsible for the correct and effective implementation of their proposed CAP.

Intertek nor any of its affiliates shall be held liable for any direct, indirect, threatened, consequential, special, exemplary or other damages that may result including but not limited to economic loss, injury, illness, or death arising from the inability of a facility to implement its CAP.



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