




# Sedex Members Ethical Trade Audit Report

**Version 6.1**



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 418788473	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 418848484
Business name (Company name):	MULTIPAK AMBALAJ VE GIDA SANAYI.TIC.A.Ş.		
Site name:	MULTIPAK AMBALAJ VE GIDA SANAYI.TIC.A.Ş.		
Site address: <i>(Please include full address)</i>	YAZIBAŞI MAHALLESİ BATIBETON CADDESİ NO:10/1 TORBALI-İZMİR	Country:	TURKEY / TÜRKİYE
Site contact and job title:	CANSU KIRKPINAR BAHTIYAR – KALİTE GUVENCE VE ÇEVRE MÜHENDİSİ / QUALITY ASSURANCE AND ENVIRONMENTAL ENGINEER		
Site phone:	0902328537495	Site e-mail:	cansu.bahtiyar@multipak.com.tr
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:	13-14.04.2023		

<b>Audit Company Name &amp; Logo:</b>  	<b>Report Owner (payer):</b> <i>(If paid for by the customer of the site please remove for Sedex upload)</i>  <b>MULTIPAK AMBALAJ VE GIDA SANAYI.TIC.A.Ş.</b>
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

If you have any concerns or queries about this SMETA report or the associated SMETA audit, please contact [grievance@sedex.com](mailto:grievance@sedex.com).

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



## Audit Content:

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

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

### 2-Pillar SMETA Audit

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

### 4-Pillar SMETA

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

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

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

## SMETA Declaration

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

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

Any exceptions to this must be recorded here (e.g. different sample size): None

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

Lead auditor: FATMA ARLI-LEAD AUDITOR APSCA number: RA 21702375

Lead auditor APSCA status: IN GOOD STANDING

Team auditor: PINAR OZBALTAN-TEAM AUDITOR APSCA number: ASCA 32200350

Interviewers: FATMA ARLI- PINAR OZBALTAN APSCA number: RA 21702375- ASCA 32200350

Report writer: FATMA ARLI

Report reviewer: NALAN GUNGOR- REPORT REVIEWER

Date of declaration: 14.4.2023

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

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

## Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A <a href="#">Universal Rights covering UNGP</a>			<input type="checkbox"/>	<input type="checkbox"/>		0	0	NONE OBSERVED
0B <a href="#">Management systems and code implementation</a>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	NONE OBSERVED
1. <a href="#">Freely chosen Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	NONE OBSERVED
2. <a href="#">Freedom of Association</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	NONE OBSERVED
3. <a href="#">Safety and Hygienic Conditions</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	1	0	0	NC  Building using permit does not cover 3899 sqm of the 1st building. Building registration license was provided for this areas of this building. Building using permit does not cover 1000 sqm of the 2nd building. Building registration license was provided for this areas of this building.
4. <a href="#">Child Labour</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	NONE OBSERVED
5. <a href="#">Living Wages and Benefits</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	4	GE 1- Meal and transportation are free of charge to employees. 2- Food aids of min 500 tl are given to employees at min three times in a year.

									3- Overtime compensation is 200 % for national and religious holidays and weekend overtime practices . 4- There is payment of 150 tl as absenteeism bonus once in a 3 months.
6	<u>Working Hours</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	1	0	0	NC It was noted that some employees worked in their rest days August 2022: 6 employees worked max 2 times, maximum 7 consecutive days October 2022: none observed March 2023: 12 employees worked max 2 times, maximum 7 consecutive days
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	NONE OBSERVED
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	NONE OBSERVED
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	NONE OBSERVED
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	NONE OBSERVED
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	NONE OBSERVED
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	NA	NA	NOT APPLICABLE
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	NONE OBSERVED
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	NONE OBSERVED

General observations and summary of the site:

The facility was established in August 2008 at the current address in Izmir. They produce paper plates, glasses, cake capsules and cooking cups. There are Printing, Cutting ,Forming and Packaging proceses.



There are 2 buildings.

BUILDING 1: The first building has all production areas and also raw material warehouse and administration offices. The first building has a 4754 m2 total area and two floors. First Floor: All production area, doctor room, changing room , toilets. There is also semi-finished material warehouse in the mezzanine floor in the production area. Second Floor: Administration Offices

BUILDING 2: There is only a finished material warehouse in the second building. The total area is 1520 m2. There is one ground floor where there is the warehouse and also one mezzanine floor where there are administration offices. The buildings are reinforced concrete.

Total number of employees : 161

Administration :22 ( 8 male and 14 female )

Production:139 ( 62 male and 77 female )

Young labour:0

Migrant: 1 ( Administration employee. ( egypt )

Pregnant:1

Maternity leave:1

Disabled: 5

Daily paid :0

Piece rate:0

Minimum age is 19 at site

Face scan time recording system was used for all employees in the facility.

The working hours in the facility are arranged as follows:

For all employees except administration and warehouse employees; From Monday to Saturday, 8:00-16:00 /16:00-00:00 /00:00-08:00 (including 30 minutes lunch break and 10 minutes tea break x 6 days a week

The Administration and Warehouse employees work from 08:00 to 17:30(including 30 minutes lunch break) x 5 days a week

Payment Period: Monthly

Payment Day: 10th day of each month by bank

The facility has the below certificates; ISO 9001:2015 valid till 15.10.2023 ISO14001:2015 valid till 15.10.2023 ISO 22000:2005 valid till 15.10.2023 FSC Certificate valid till 22.09.2025 GMP Certificate valid till 12.10.2023. ECO LABEL certificate valid till 30.06. 2023 PEFC Certificate: Valid till 20.1.2027 BRC Certificate: valid till 04.11.2023

There is no dormitory at the facility.

There is no service provider in the facility.



26 employees were selected . 6 employees interviewed individually and 4 groups of 5 employees interviewed . 26 employees` time and payment records for March 2023 ( last paid month ) , August 2022 ( peak month) and October 2022 ( non peak month )  
There are time and payment records for last 12 months in the facility.

Since July 1st, 2022: 6471 TL (Gross); 5500,35 TL Net / month  
Since January 2023, 10.008,00 TL (Gross); 8.506,80 TL Net / month

Overtime hours are as below:  
August 2022: Max 60 hours/ month  
October 2022: Max 22 hours/month  
March 2023: Max 22,5 hours/month

Unionization process has just been started at site. SELULOZ IS UNION entered to the facility as legally and CBA is not signed yet. CBA agreement process continue.

#### **Audit Process**

At 09:30 am on 13<sup>th</sup> April 2023, FATMA ARLI - LEAD AUDITOR and PINAR OZBALTAN - TEAM AUDITOR entered the facility then held an opening meeting according to the ETI Base Code; the facility management was present in the meeting. Opening and closing meeting was held with ÜMİT KAYA- QA MANAGER, SECIL DINLER – H&R ADMINISTRATION , HUSEYİN DUMAN- HS EXPERT and CANSU KIRKPINAR BAHTİYAR – ENVIRONMENT RESPONSIBLE .

#### **Issues found-NC's**

NC1

Building using permit does not cover 3899 sqm of the 1st building. Building registration license was provided for this areas of this building. Building using permit does not cover 1000 sqm of the 2nd building. Building registration license was provided for this areas of this building.

NC2

It was noted that some employees worked in their rest days  
August 2022: 6 employees worked max 2 times, maximum 7 consecutive days  
October 2022: none observed  
March 2023: 12 employees worked max 2 times, maximum 7 consecutive days

#### **Observation**

None

**GE**

- 1- Meal and transportation are free of charge to employees.
- 2- Food aids of 500 tl are given to employees at three times in a year.
- 3- Overtime compensation is 200 % for national and religious holidays and weekend overtime practices .
- 4- There is payment of 150 tl as absenteeism bonus once in a 3 months.

*\*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:	MULTIPAK AMBALAJ VE GIDA SANAYI.TIC.A.Ş.													
B: Site name:	MULTIPAK AMBALAJ VE GIDA SANAYI.TIC.A.Ş.													
C: GPS location: (If available)	GPS Address: YAZIBAŞI MAHALLESİ BATIBETON CADDESİ NO:10/1 TORBALI-İZMİR	Latitude: 38°13'12.2"N Longitude: 27°19'33.3"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 includes warehouse: Date: 19.07.2022, Document no: 251													
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacturer of flexo printing, cutting, forming and packaging of disposable paper products such as plates and cups.													
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>The company was established in 22.09.2008 at their current address as a manufacturer of flexo printing, cutting, forming and packaging of disposable paper products such as plates and cups. The facility established as Limited Company and convert to Incorporated Company in 2019.</p> <table border="1"> <thead> <tr> <th>Production Building no 1</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Floor 1</td> <td>All production area, Doctor Room, Lunchroom, Changing Room, Toilets</td> <td>NA</td> </tr> <tr> <td>Floor 2</td> <td>Administration Offices</td> <td>NA</td> </tr> <tr> <td>Is this a shared building?</td> <td>NO</td> <td>NA</td> </tr> </tbody> </table> <p>In January 2022 , they add one more building to their land and now there are 2 buildings in the area.</p> <p>Total area of the facility is 6391 m2 and has 2 buildings.            Building 1 : There are 2 floors in the building .            Entrance Floor: All production area, Doctor Room, Lunchroom, Changing Room, Toilets            Second Floor: Administration Offices            Building 2 : There is only one mezzanine floor and entrance floor.            Entrance Floor: Warehouse</p>		Production Building no 1	Description	Remark, if any	Floor 1	All production area, Doctor Room, Lunchroom, Changing Room, Toilets	NA	Floor 2	Administration Offices	NA	Is this a shared building?	NO	NA
Production Building no 1	Description	Remark, if any												
Floor 1	All production area, Doctor Room, Lunchroom, Changing Room, Toilets	NA												
Floor 2	Administration Offices	NA												
Is this a shared building?	NO	NA												

	<p>Mezzanine Floor: Warehouse</p> <p>The building is concrete structure.</p> <table border="1" data-bbox="657 427 1485 629"> <thead> <tr> <th>Production Building no 2</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Floor 1</td> <td>Warehouse</td> <td>NA</td> </tr> <tr> <td>Mezzanine Floor</td> <td>Warehouse</td> <td>NA</td> </tr> <tr> <td>Is this a shared building?</td> <td>NO</td> <td>NA</td> </tr> </tbody> </table> <p>For below, please add any extra rows if appropriate.</p> <p>F1: Visible structural integrity issues (large cracks) observed?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: There is no crack on building</p> <p>F3: Does the site have a structural engineer evaluation?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>F4: Please give details: The company had a building structure construction permit.</p>	Production Building no 2	Description	Remark, if any	Floor 1	Warehouse	NA	Mezzanine Floor	Warehouse	NA	Is this a shared building?	NO	NA
Production Building no 2	Description	Remark, if any											
Floor 1	Warehouse	NA											
Mezzanine Floor	Warehouse	NA											
Is this a shared building?	NO	NA											
<p>G: Site function:</p>	<p><input type="checkbox"/> Agent  <input checked="" type="checkbox"/> Factory Processing/Manufacturer  <input type="checkbox"/> Finished Product Supplier  <input type="checkbox"/> Grower  <input type="checkbox"/> Homeworker  <input type="checkbox"/> Labour Provider  <input type="checkbox"/> Pack House  <input type="checkbox"/> Primary Producer  <input type="checkbox"/> Service Provider  <input type="checkbox"/> Sub-Contractor</p>												
<p>H: Month(s) of peak season: (if applicable)</p>	<p>June-July- August</p>												
<p>I: Process overview:  <i>(Include products being produced, main operations, number of production lines, main equipment used)</i></p>	<p>Raw material, Printing, Cutting , Forming , Packaging . There are 17 cup forming lines , 16 plate forming lines, 2 cake forming , 2 box folding lines . There are 7 cutting machines, 2 flexo printing machines, 1 reel slicing machine, 3 packaging machines.</p>												
<p>J: What form of worker representation / union is there on site?</p>	<p><input type="checkbox"/> Union  <input type="checkbox"/> Worker Committee  <input checked="" type="checkbox"/> Other (Open door policy, suggestion boxes and worker representatives)  <input type="checkbox"/> None</p>												
<p>K: Is there any night production work at the site?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>												

<p>L: Are there any on site provided worker accommodation buildings e.g. dormitories</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  L1: If yes, approx. % of workers in on site accommodation</p>
<p>M: Are there any off site provided worker accommodation buildings</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  M1: If yes, approx. % of workers</p>
<p>N: Were all site-provided accommodation buildings included in this audit</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  N1: If no, please give details: There is no accomodation</p>

Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 09:30 A2: Day 1 Time out:16:30	A3: Day 2 Time in: 09:00 A4: Day 2 Time out:14:00	A5: Day 3 Time in: NA A6: Day 3 Time out:NA
B: Number of auditor days used:	2,5 MANDAYS ( 2 AUDITORS IN ONE DAYS AND 1 AUDITOR IN 0,5 DAY)		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" 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 checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail:    weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If <b>Yes</b> , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	CANSU KIRKPINAR BAHTIYAR / QUALITY ASSURANCE AND ENVIRONMENTAL ENGINEER		
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:	21.07.2022		
J: Previous audit type:	SMETA 4 PILLAR - 1 <sup>ST</sup> FOLLOW UP AUDIT		
K: Were any previous audits reviewed for this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  <input type="checkbox"/> N/A		

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

A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	There was no worker committee at the facility. There were 3 worker representatives at the facility. Due to worker representatives were busy at work , they could not attended to opening and closing meeting in audit date		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	NA There was no union at the facility. Unionization process has JUST been started. Due to worker representative was busy at work she could not attended to opening and closing meeting. But 1 worker representative interviewed.		



## Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	70	0	0	0	0	0	0	70
Worker numbers – female	91	0	0	0	0	0	0	91
Total	161	0	0	0	0	0	0	161
Number of Workers interviewed – male	11	0	0	0	0	0	0	11
Number of Workers interviewed – female	15	0	0	0	0	0	0	15
Total – interviewed sample size	26	0	0	0	0	0	0	26

A: Nationality of Management	TURKISH	
<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first.</p> <p><i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities:</p> <p>B1: Nationality 1: <u>_TURKISH_</u></p> <p>B2: Nationality 2: _____</p> <p>B3: Nationality 3: _____</p>	<p>Was the list completed during peak season?</p> <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods: Number of employees are stable with peak season</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx % total workforce: Nationality 1 <u>_100_</u></p> <p>C1: approx % total workforce: Nationality 2 _____</p> <p>C2: approx % total workforce: Nationality 3 _____</p>	
D: Worker remuneration <i>(management information)</i>	<p>D: _____% workers on piece rate</p> <p>D1: <u>_100_</u>% hourly paid workers</p> <p>D2: _____% salaried workers</p> <p>Payment cycle:</p> <p>D3: _____% daily paid</p> <p>D4: _____% weekly paid</p> <p>D5: <u>_100_</u>% monthly paid</p> <p>D6: _____% other</p> <p>D7: If other, please give details</p>	

Worker Interview Summary	
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	4 GROUPS OF 5 EMPLOYEES
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 2      D2: Female: 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 NA
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
H: What was the most common worker complaint?	NONE
I: What did the workers like the most about working at this site?	PAYMENT ON TIME
J: Any additional comment(s) regarding interviews:	NONE
K: Attitude of workers to hours worked:	THEY ARE PLEASED FOR WORKING HOURS
L. Is there any worker survey information available?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: If yes, please give details: Survey is conducted once a year	
M: Attitude of workers: <i>(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk</i>	

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

N: Attitude of worker's committee/union reps:  
 (Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk

No negative comment was noted during the worker representative interview.

O: Attitude of managers:  
 (Include attitude to audit, and audit process. Both positive and negative information should be included)

Management was helpful during the audit process.

## Audit Results by Clause

### 0A: Universal Rights covering UNGP

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

#### 0.A. Guidance for Observations

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

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

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

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

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

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

The facility has social compliance policy and procedures that includes supplier management. Social compliance responsible is authorized as ÜMİT KAYA- QUALITY ASSURANCE MANAGER. All employees can communicate any issue directly.

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

Details:

- Social compliance policy and related procedures
- Authorization letter of social compliance responsible
- Grievance Mechanism Feedbacks
- Management interview
- Employee interviews

Any other comments: None

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

- Yes
- No

A1: Please give details: The facility has a detailed social compliance policy that includes human rights.

<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Name: SECIL ERDIL Job title: H&amp;R ADMINISTRATION</p>
<p>C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>C1: Please give details: The facility has suggestion boxes placed at several places.</p>
<p>D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D1: If no, please give details The grievance mechanism both for employees and external business partners is legitimate, accessible, predictable, transparent, rights-compatible – in line with UNGP – and it is supported with the grievance mechanism feed backs.</p>
<p>E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>E1: Please give details: The facility has detailed privacy procedures for worker's information such as personnel file, labor contract. Also, the feedbacks getting from suggestion boxes are evaluated by the management in a confidential way.</p>

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

Good examples observed:	
<p><b>Description of Good Example (GE):</b> None observed</p>	<p><b>Objective Evidence Observed:</b> NA</p>

## Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 2022 __NOT CALCULATED__ %	A2: This year 2023 _ NOT CALCULATED ____ %
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 <sup>st</sup> day of 90 day period + number of employees on the last day of the 90 day period) / 2]	NOT CALCULATED 21%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 <sup>st</sup> day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 2022 _ NOT CALCULATED ____ %	C2: This year 2023 __ NOT CALCULATED %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 <sup>st</sup> of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	NOT CALCULATED	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Accident records are kept.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year:2022 Number: 60	F2: This year:2023 Number: 32
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]	11	
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:20202 21,33	H2: This year: 2023 37,5
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 which were posted onsite.  
 All social compliance issues are managed and monitored internally.  
 The employees have information regarding social compliance, social and legal rights.  
 The facility management has already posted ETI Base code on notice boards.  
 The facility has its own documented social policy that covers all issues mentioned in ETI Base Code.  
 Overall responsibility for meeting the standards is taken by ÜMİT KAYA- QA ASSURANCE MANAGER.

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

Details:

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

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: NA

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>Policies exist for all areas (Forced labor, Health and Safety, Wages, Working Hours, and No harsh treatment, Environment, Business Ethics, Child Labour, Recruitment, Discrimination and Sub- contracting.). These are communicated to workers via poster and annual training.</p> <p>Through documents review and workers' interviews, policy on 'No harsh treatment and Environment' was fully in compliance with the code.</p> <p>In addition; workers stated that no forced labor, no child labor was found in the facility (interview and document checks), there were both female and male among management/supervisors.</p>
<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment &amp; 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 all staff through posters and communicated as a part of orientation training.</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: Training records were available.</p>
<p>F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). <i>Please detail (Number and date).</i></p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>F1: Please give details:</p> <p>The facility has below certificates. Ecolabel, BRC, ISO 14001 ,ISO 9001, ISO 22000, FSC and Chain of Custody certification</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: SECIL ERDIL - H&amp;R ADMINISTRATION</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: ÜMİT KAYA- QA ASSURANCE MANAGER</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>

	I1: Please give details: The facility communicates the ETI Base Code to all employees via posting to the announcement board.
J: Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: All worker information is kept on their personnel files.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Health and Safety Risk assessment including policy and procedure effectiveness was conducted.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: The facility performs a corrective action plan for the findings that are addressed in 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: The facility has choosing and evaluating procedure for its suppliers.
<b>Land rights</b>	
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: Facility has operating license
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: Facility has business license and approved building permit
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: Facility has land right policy
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 there is operating license .
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 of a land acquisition, the

	facility has to apply to the municipality and fulfil the obligations regarding environmental impact assessment, 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: NA

Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed  <b>Local law and/or ETI requirement: NA</b>  <b>Recommended corrective action: NA</b>	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>  <b>NA</b>

Observation:	
<b>Description of observation:</b> None observed  <b>Local law or ETI requirement:</b> NA  <b>Comments:</b> NA	<b>Objective evidence observed:</b>  NA

Good Examples observed:	
<b>Description of Good Example (GE):</b> None observed	<b>Objective evidence observed:</b>  NA

**1: Freely Chosen Employment**

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

**ETI**

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

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

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

Details:

- Policy documents
- Workers' interviews
- Personnel files and pay-slips
- Disciplinary records
- Labour contracts

Any other comments: None

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

D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding: NA
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: NA
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected:
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: The facility has a detailed procedure regarding this issue which includes reducing the risk of forced / trafficked labour at the facility.

<b>Non-compliance:</b>	
<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law:    <input type="checkbox"/> NC against customer code:                      None observed  <b>Local law and/or ETI requirement NA</b>  <b>Recommended corrective action: NA</b></p>	<p><b>Objective evidence observed:</b>                      (where relevant please add photo numbers)                       NA</p>

<b>Observation:</b>	
<p><b>Description of observation: None observed</b>  <b>Local law or ETI requirement: NA</b>  <b>Comments: NA</b></p>	<p><b>Objective evidence observed:</b>                       NA</p>

Good Examples observed:	
Description of Good Example (GE): None observed	<b>Objective evidence observed:</b>  NA



**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.  
 Company does not restrict workers to join or form any union which is asked during interviews.  
 There was an open-door policy in operation at the company. Employees may appeal their grievances or suggestions directly to their supervisors. Also, employees stated that they can use suggestion boxes to express their opinions and they can share the issues with Worker Representative.

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

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

Any other comments: None

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

<p>D: Is there any other form of effective worker/management communication channel? <i>(Other than union/worker committee e.g. H&amp;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.</p> <p>D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <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: NA-There is no union in the facility</p>	
<p>F: Name of union and union representative, if applicable:</p>	<p>NA, there is no union</p>	<p>F1: 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>Employee representative</p>	<p>G1: 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>Employees know worker representatives</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: 9.11.2020</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 If <b>Yes</b>, please state how many: 1</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>NA-There is no union in 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>	
<p>If <b>Yes</b>, what percentage by trade Union/worker representation</p>	<p>M1: __NA__% workers covered by Union CBA</p>	<p>M2: __NA__% workers covered by worker rep CBA</p>
<p>M3: If <b>Yes</b>, does the Collective Bargaining Agreement (CBA) include rates of pay?</p>	<p><input type="checkbox"/> Yes NA <input type="checkbox"/> No</p>	

Non-compliance:	
<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI    <input type="checkbox"/> NC against Local Law    <input type="checkbox"/> NC against customer code:                      None observed</p> <p><b>Local law and/or ETI requirement: NA</b></p> <p><b>Recommended corrective action: NA</b></p>	<p><b>Objective evidence observed:</b>                      (where relevant please add photo numbers)</p> <p><b>NA</b></p>

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

Good Examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p><b>Objective evidence observed:</b></p> <p>NA</p>

**3: Working Conditions are Safe and Hygienic**

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

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

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- 1. General Health and Safety management
  - Working environment was generally safe and hygienic.
  - Access to clean toilet segregated by gender and to potable water was provided
  - Risk assessment was available
  - Industrial measurements were available.
  - Emergency case plans were provided inside the facility.
  - Emergency evacuation plans were provided in the facility
- 2. Fire Safety
  - There were emergency exits from each work area and one of emergency exit doors were not clearly marked and was not lighted
  - Firefighting equipment was adequate and checks were up-to-date externally.
  - Fire extinguishers were marked and mounted with sufficient number.
  - Fire alarm was provided and active.
  - Smoke detectors is provided for the whole facility.
  - Fire hose system is provided to the facility area.
  - Fire training was provided to teams by authorized establishments.
  - Fire drill and fire training was provided to all employees.
- 3. Electrical safety
  - All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards.
  - Electricity grounding with compliant results were available.
  - Internal electricity system check report with improvement required were provided from authorized engineers.
- 4. Chemical safety
  - There were stain removing chemicals and stain removing training was provided in case.
  - The MSDS forms are also available.

5. Medical services

- There were adequate first aid kits in each production area and they were well stocked.
- There are contracted occupational doctor and HS expert

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

Details: Health & Safety documents, official permits, H&S policy & procedures, health records, accident records, drill & training records etc.

<p>A: Does the facility have general and occupational Health &amp; Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>A1: Please give details: There are HS policy and procedures.</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>B1: Please give details: The HS procedures are provided to all workers, also in employee files</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>C1: Please give details: There is no additional building.</p>
<p>D: Are visitors to the site informed on H&amp;S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D1: Please give details: Employees were trained for using PPE s by HS expert</p>
<p>E: Is a medical room or medical facility provided for workers?  If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>E1: Please give details: There is contracted doctor and infirmary room</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>F1: Please give details : Documentation is provided for review for compliance.</p>
<p>G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No NA</p> <p>G1 : Please give details: NA, no accommodation provided</p>
<p>H: Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>H1: Please give details: Related risks are included.</p>

<p>I: Are H&amp;S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>I1: Please give details : Documentation is provided for review for compliance.</p>
<p>J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>J1: Please give details : legal permits are provided</p>
<p>K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>K1: Please give details: list of chemicals, banned chemicals and documentation is available.</p>

<p style="text-align: center;"><b>Non-compliance:</b></p>	
<p><b>1. Description of non-compliance:</b>  <input checked="" type="checkbox"/> NC against ETI/Additional Elements      <input checked="" type="checkbox"/> NC against Local Law  <input type="checkbox"/> NC against customer code:                      Building using permit does not cover 3899 sqm of the 1st building. Building registration license was provided for this areas of this building. Building using permit does not cover 1000 sqm of the 2nd building. Building registration license was provided for this areas of this building.</p> <p><b>Local law and/or ETI requirement:</b>                      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>ZONING LAW (1) (2)Law Number: 3194Acceptance Date: 3/5/1985Published in Official Gazette: Date: 9/5/1985 Issue: 18749Code of Publication: Series: 5 Volume: 24 Page: 378Building occupancy permit:Article 30 .</p> <p><b>Recommended corrective action:</b> It is recommended to ensure that approved building permit covered all areas of the facility.</p>	<p><b>Objective evidence observed:</b>                      (where relevant please add photo numbers)</p> <p>1- Document Review</p>

<p style="text-align: center;"><b>Observation:</b></p>	
<p><b>Description of observation:</b> None Observed</p> <p><b>Local law or ETI requirement:</b> Not applicable</p> <p><b>Comments:</b> Not applicable</p>	<p><b>Objective evidence observed:</b></p> <p>Not applicable</p>

Good Examples observed:	
Description of Good Example (GE): None observed	<b>Objective Evidence Observed:</b> NA



**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:**

The youngest employee was 19 years old in the facility.  
 The age control of applicants is performed during recruitment process by HR responsible.

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

Details:

- ID Copies of employees
- Personnel file
- Management and employees' interviews

Any other comments: None

A: Legal age of employment:	15
B: Age of youngest worker found:	19
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0 %
E: Are workers under 18 subject to hazardous work assignments? <a href="#">(Go to clause 3 – Health and Safety)</a>	<input type="checkbox"/> Yes    NA <input type="checkbox"/> No E1: If yes, give details

Non-compliance:	
<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:                      None observed</p> <p><b>Local law and/or ETI requirement: NA</b></p> <p><b>Recommended corrective action: NA</b></p>	<p><b>Objective evidence observed:</b>                      (where relevant please add photo numbers)</p> <p><b>NA</b></p>

Observation:	
<p><b>Description of observation: None observed</b></p> <p><b>Local law or ETI requirement: NA</b></p> <p><b>Comments: NA</b></p>	<p><b>Objective evidence observed:</b>                      NA</p>

Good Examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p><b>Objective Evidence Observed:</b>                      NA</p>

**5: Living Wages are Paid**

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

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

**ETI**

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

There was no employee under the legal minimum wage. Pay slip is given to the employees.

Annual leaves are used by the employees properly.

All employees were paid above minimum wage.

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

Since July 1st, 2022: 6471 TL (Gross); 5500,35 TL Net / month

Since January 2023, 10.008,00 TL (Gross); 8.506,80 TL Net / month

26 employees were selected . 6 employees interviewed individually and 4 groups of 5 employees interviewed . 26 employees` time and payment records for March 2023 ( last paid month ) , August 2022 ( peak month) and October 2022 ( non peak month )

There are time and payment records for last 12 months in the facility.

Overtime hours are as below:

August 2022: Max 60 hours/ month

October 2022: Max 22 hours/month

March 2023: Max 22,5 hours/month

Payment day is till 10<sup>th</sup> of every month.

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

Details:

Social insurance records

Employees' & management interviews

Labor contracts

Any other comments: None

<b>Non-compliance:</b>	
<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:                      None observed  <b>Local law and/or ETI requirement: NA</b>  <b>Recommended corrective action: NA</b></p>	<p><b>Objective evidence observed:</b>                      (where relevant please add photo numbers)                      NA</p>

<b>Observation:</b>	
<p><b>Description of observation: None observed</b>  <b>Local law or ETI requirement: NA</b>  <b>Comments: NA</b></p>	<p><b>Objective evidence observed:</b>                      NA</p>

<b>Good Examples observed:</b>	
<p><b>Description of Good Example (GE):</b></p> <p>1- Meal and transportation are free of charge to employees.                      2- Food aids of 500 tl are given to employees at three times in a year.                      3- Overtime compensation is 200 % for national and religious holidays and weekend overtime practices .                      4- There is payment of 150 tl as absenteeism bonus once in a 3 months.</p>	<p><b>Objective Evidence Observed:</b></p> <p>Employee interview and document review</p>

### Summary Information

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal maximum: 45 hours/week	A1:45 hours/week for all employees.	A2: <input type="checkbox"/> Yes <input type="checkbox"/> No There is no CBA in the facility.
B: Overtime hours:	Legal maximum:	B1:Max 11 hours (regular +	B2: <input type="checkbox"/> Yes

<p>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</p>	<p>11 total working hours per day (regular + overtime), 270 overtime hours per year</p>	<p>overtime) per day for all selected months</p> <p>Highest overtime hours are below:              August 2022: Max 60 hours/month              October 2022: Max 22 hours/month              March 2023: Max 22,5 hours/month</p>	<p><input type="checkbox"/> No              There is no CBA in the facility.</p>
<p>C: Wage for standard/contracted hours:              (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</p>	<p>Legal minimum: Since July 1st, 2022: 6471 TL (Gross); 5500,35 TL Net / month              Since January 2023, 10.008,00 TL (Gross); 8.506,80 TL Net / month</p>	<p>C1: Since July 1st, 2022: 6471 TL (Gross); 5500,35 TL Net / month              Since January 2023, 10.008,00 TL (Gross); 8.506,80 TL Net / month</p>	<p>C2:  <input type="checkbox"/> Yes  <input type="checkbox"/> No              There is no CBA in the facility.</p>
<p>D: Overtime wage:              (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</p>	<p>Legal minimum: 150% for overtime in weekdays. Overtime premium for national/religious holidays and weekly holiday is 200%</p>	<p>D1: 150% for overtime in weekdays. Overtime premium for national/religious holidays and weekly holiday is 200%</p>	<p>D2:  <input type="checkbox"/> Yes  <input type="checkbox"/> No              There is no CBA in the facility.</p>

<p style="text-align: center;"><b>Wages analysis:</b>  <a href="#">(Click here to return to Key Information)</a></p>	
<p>A: Were accurate records shown at the first request?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>
<p>A1: If <b>No</b>, why not?</p>	<p>NA</p>
<p>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)</p>	<p>26 employees were selected . 6 employees interviewed individually and 4 groups of 5 employees interviewed . 26 employees` time and payment records for March 2023 ( last paid month ) , August 2022 ( peak month) and October 2022 ( non peak month )</p>

	There are time and payment records for last 12 months in the facility.		
C: Are there different legal minimum wage grades? If <b>Yes</b> , please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	C1: If <b>Yes</b> , please give details: NA	
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	D1: If <b>No</b> , please give details: NA	
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> According to the documents examined employees earn minimum 8506.80 tl net/monthly. (Net- including subsistence allowance)	
F: Please indicate the breakdown of workforce per earnings:	F1: ___% of workforce earning under minimum wage F2: <u>22</u> % of workforce earning minimum wage F3: <u>78</u> % of workforce earning above minimum wage		
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i>  <i>There is no bonus payment</i>		
H: What deductions are required by law e.g. social insurance? Please state all types:	Social insurance ad taxes		
I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that <b>have</b> been made.	1. Taxes 2. Social insurance  Please describe: NA
		I2: Please list all deductions that <b>have not</b> been made.	1. NA 2. NA  Please describe: NA
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	K1: Type NA  <input type="checkbox"/> Poor record keeping	

	<input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: All records reflect all time worked.
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info:          Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time: NA
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks NA <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details:
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: Please give details: NA
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: Equal rates are being paid for equal work.
Q: How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain:

**6: Working Hours are not Excessive**

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

**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:**

The working hours is for production and administrative employees as per interviews and documentation is:

Face scan time recording system was used for all employees in the facility.

The working hours in the facility are arranged as follows:

For all employees except administration and warehouse employees; From Monday to Saturday, 8:00-16:00 /16:00-00:00 /00:00-08:00 (including 30 minutes lunch break and 10 minutes tea break x 6 days a week

The Administration and Warehouse employees work from 08:00 to 17:30(including 30 minutes lunch break) x 5 days a week



26 employees were selected . 6 employees interviewed individually and 4 groups of 5 employees interviewed . 26 employees` time and payment records for March 2023 ( last paid month ) , August 2022 ( peak month) and October 2022 ( non peak month )

There are time and payment records for last 12 months in the facility.

Overtime hours are as below:

August 2022: Max 60 hours/ month

October 2022: Max 22 hours/month

March 2023: Max 22,5 hours/month

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

Time and payment records were available for last 12 months in the facility.

Details: Time records, production records, employee & management interviews

Any other comments: None

**Non-compliance:**

**2. Description of non-compliance:**

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

It was noted that some employees worked in their rest days  
 August 2022: 6 employees worked max 2 times, maximum 7 consecutive days  
 October 2022: none observed  
 March 2023: 12 employees worked max 2 times, maximum 7 consecutive days

**Local law and/or ETI requirement:**

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

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

Turkish Labour Law # 4857 / 2003, ARTICLE 63- In general the duration of work shall be at the most 45 hours a week. This period shall be applied by dividing the same equally among the days of the week worked.

**Recommended corrective action:** It is recommended to provide 1 day off in a week.

**Objective evidence observed:**

*(where relevant please add photo numbers)*

2- Document Review, Employee Interviews

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

Good Examples observed:	
<b>Description of Good Example (GE):</b> None observed	<b>Objective Evidence Observed:</b> NA

<b>Working hours' analysis</b> Please include time e.g. hour/week/month <a href="#">(Go back to Key information)</a>					
Systems & Processes					
A. What timekeeping systems are used: time card etc.	Describe: Face scan time recording system				
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details <b>NA</b>				
C: Are standard/contracted working hours defined in <b>all</b> 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: NA			
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: NA			
E. Do any standard/contracted working hours defined in	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E1: If <b>yes</b> , please detail hours, %, types of workers affected and frequency Please give details: NA			

contracts/employment agreements exceed 48 hours per week?		
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 type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input checked="" type="checkbox"/> No If 'No', please explain:	F3: Is this allowed by local law? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Maximum number of days worked without a day off (in sample):	
	It was noted some employees worked in their rest days . Pls. refer NC # 2	
<b>Standard/Contracted Hours worked</b>		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency:
		NA
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details:
		NA
<b>Overtime Hours worked</b>		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: August 2022: Max 60 hours/ month October 2022: Max 22 hours/month March 2023: Max 22,5 hours/month	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	__40__%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements:

		Worker Interviews
<b>Overtime Premiums</b>		
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	<i>M1: Please give details of normal day overtime premium as a % of <b>standard</b> wages:</i>  1500% for overtime in weekdays. Overtime premium for national/religious holidays and weekly holiday is 200%
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<i>N1: If yes, please describe % of workers &amp; frequency:</i>  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 NA <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	
	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other	
	NA	
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"/> <b>Overtime is voluntary NA</b> <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:	
	NA	
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: If yes, please give details: NA	
R: If sufficient workers cannot be hired, are	<input type="checkbox"/> Yes <input type="checkbox"/> No	

new working time arrangements explored to ensure that overtime is the exception rather than the rule.	NA
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**7: No Discrimination is Practiced**

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**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

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

Company social compliance policy

Employee interview

Any other comments: None

<p>A: Gender breakdown of Management + Supervisors (Include as one combined group)</p>	<p>A1: Male: <u>37</u> % A2: Female <u>63</u> %</p>
<p>B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:</p>	<p>3 # Environment engineer, food engineer, industrial engineer</p>
<p>C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:</p>	<p> <input type="checkbox"/> Hiring  <input type="checkbox"/> Compensation  <input type="checkbox"/> Access to training  <input type="checkbox"/> Promotion  <input type="checkbox"/> Termination or retirement  <input checked="" type="checkbox"/> No evidence of discrimination found         </p> <p>C1: Please give details: There is no evidence of discrimination</p>

**Professional Development**

A: What type of training and development are available for workers?	Discrimination policy and procedure training are given to employees. Also, discipline rules are explained.
---	--

B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details: NA
--	--

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

Observation:	
<p><b>Description of observation:</b> None observed</p> <p><b>Local law or ETI requirement:</b> NA</p> <p><b>Comments:</b> NA</p>	<p><b>Objective evidence observed:</b></p> <p>NA</p>

Good Examples observed:	
<p><b>Description of Good Example (GE):</b> None observed</p>	<p><b>Objective Evidence Observed:</b></p> <p>NA</p>

**8: Regular Employment Is Provided**

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**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' labor contracts were available in their personnel files.

Labor contracts were in accordance with the laws and regulations.

A copy of employment contract was given to employees.

All employees were registered to the social security.

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

Details:

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

Any other comments: None



Non-compliance:	
<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:                      None observed</p> <p><b>Local law and/or ETI requirement: NA</b></p> <p><b>Recommended corrective action: NA</b></p>	<p><b>Objective evidence observed:</b>                      (where relevant please add photo numbers)</p> <p>NA</p>

Observation:	
<p><b>Description of observation: None observed</b></p> <p><b>Local law or ETI requirement: NA</b></p> <p><b>Comments: NA</b></p>	<p><b>Objective evidence observed:</b></p> <p>NA</p>

Good Examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p><b>Objective Evidence Observed:</b></p> <p>NA</p>

## Responsible Recruitment

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

purpose of recruitment/placement?	B1: If yes, please describe details and specific category(ies) of workers affected:
C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees      NA <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:	NA

<b>Migrant Workers:</b> <i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i>	
A: Type of work undertaken by migrant workers:	There was no migrant employee at the facility.
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: NA B2: Total number of (outside of local country) recruitment agencies used: NA
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes NA <input type="checkbox"/> No C1: Please describe finding: C2: Observations: NA
D: Are Any migrant workers in skilled, technical, or management roles	<input type="checkbox"/> Yes NA <input type="checkbox"/> No D1: If yes, number and example of roles:

<p><i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i></p>	
--	--

**NON-EMPLOYEE WORKERS**

<b>Recruitment Fees:</b>	
A: Are there any fees?	<input type="checkbox"/> Yes No non-employee worker is available in the facility. <input type="checkbox"/> No
B: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees NA <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:	NA

<b>Agency Workers (if applicable)</b>	
<p><i>(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)</i></p>	
A: Number of agencies used (average):	A1: Names if available: NA

B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes NA <input type="checkbox"/> No
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA  D1: Please give details: NA
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes NA <input type="checkbox"/> No  E1: Please give details:

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

**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:** There is no subcontractor in the facility.

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

Details: The time records, wage records, capacity report, production records, bill of lading etc.

**Non-compliance:**

**1. 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:**

<b>Description of observation: None observed</b>  <b>Local law or ETI/Additional elements requirement: NA</b>  <b>Comments: NA</b>	<b>Objective evidence observed:</b>  NA
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<b>Good Examples observed:</b>	
Description of Good Example (GE): None observed	<b>Objective Evidence Observed:</b>  NA

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

<b>Summary of homeworking – if applicable</b>			
<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: Please describe: NA. No subcontractor was used.		
B: Number of homeworkers	B1: Male: NA	B2: Female: NA	Total: NA

<p>C: Are homeworkers employed direct or through agents?</p>	<p><input type="checkbox"/> Directly NA  <input type="checkbox"/> Through Agents</p>	<p>C1: If through agents, number of agents:</p>
		<p>NA</p>
<p>D: Is there a site policy on homeworking?</p>	<p><input type="checkbox"/> Yes NA  <input type="checkbox"/> No</p>	
<p>E: How does the site ensure worker hours and pay meet local laws for homeworkers?</p>	<p>NONE</p>	
<p>F: What processes are carried out by homeworkers?</p>	<p>NA</p>	
<p>G: Do any contracts exist for homeworkers?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No    G1: Please give details: NA</p>	
<p>H: Are full records of homeworkers available at the site?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No NA</p>	

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

**ETI**

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

Additional elements:

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

<p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&amp;S or any other grievances to a 3<sup>rd</sup> party?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>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 for reporting grievances.</p>
<p>B: If <b>Yes</b>, are workers aware of these channels and have access? Please give details.</p>	<p>Workers are aware of these channels. There are published, anonymous and / or open channels available for reporting any violations of Labour standards.</p>
<p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<p>Suggestion boxes, employee /union representative, open door policy.</p>
<p>D: Which of the following groups is there a grievance mechanism in place for?</p>	<p><input checked="" type="checkbox"/> Workers  <input checked="" type="checkbox"/> Communities  <input checked="" type="checkbox"/> Suppliers  <input type="checkbox"/> Other</p> <p>D1: Please give details: Suggestion box, employee representative, open door policy are used for employees. Also, the facility has a hotline that is posted on the entrance of the facility building for external communities.</p>
<p>E: Are there any open disputes?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>E1: If yes, please give details: The facility records open disputes and takes necessary actions.</p>
<p>F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>F1: If no, please give details</p>
<p>G: Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>G1: If no, please explain</p>
<p>H: If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>H1: If no, please give details</p>



<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>II: If yes, please give details NA</p>
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**Current Systems and Evidence Examined**

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

**Current systems:**

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

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

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

Any other comments: None

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

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

<p><b>Local law or ETI requirement:</b> NA</p> <p><b>Comments:</b> NA</p>	<p>NA</p>
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<p align="center"><b>Good Examples observed:</b></p>	
<p>Description of Good Example (GE): None observed</p>	<p><b>Objective Evidence Observed:</b></p> <p>NA</p>

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

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

**Additional Elements**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

All workers were local. No migrant worker was employed.

**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:**

**1. 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/Additional Elements requirement:** NA

**Comments:** NA

**Objective evidence observed:**

NA

Good examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed:  NA

**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:**

There is a written environmental policy of the facility.

Facility complies with environmental requirements

Facility has environment permit for main building.

There is an environment exemption letter for the 2 buildings .

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

Details:

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

Any other comments: None

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

<b>Observation:</b>	
<p><b>Description of observation:</b> None observed</p> <p><b>Local law or ETI/Additional elements requirements:</b> NA</p> <p><b>Comments:</b> NA</p>	<p><b>Objective evidence observed:</b></p> <p>NA</p>

<b>Good examples observed:</b>	
<p><b>Description of Good Example (GE):</b> None observed</p>	<p><b>Objective Evidence Observed:</b></p> <p>NA</p>

<b>Environmental Analysis</b> <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):	CANSU KIRKPINAR BAHTIYAR- ENVIROMENTAL 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Facility conduct environment impact analysis for all processes
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: VCR.TR.02.011700/R:05 Expiry Date: 15.10.2023
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? Published in web site.
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: Impact analysis include all process in the facility
F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please gives details. <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: VCR.TR.02.011700/R:05 Expiry Date: 15.10.2023
H: Have all legally required permits been shown? Please gives details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Both Environmental Permission and Environmental Impact Assessment (ÇED) Out of scope documents are received.
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: Hazardous wastes records available and wastes sent to licensed companies
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 are followed regarding environmental and chemical issues.
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: Carbon Footprint progress

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: MOTAT records in Environmental Ministry Wep Portal
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: With ERP system records
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: Followed up by Environmental Management responsible

**Usage/Discharge analysis**

Criteria	Previous year: Please state period: __2021__	Current Year: Please state period: __2022__
Electricity Usage: Kw/hrs	1933150,92	2469002,04
Renewable Energy Usage: Kw/hrs	NA	NA
Gas Usage: Kw/hrs	NA	NA
Has site completed any carbon Footprint Analysis?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If <b>Yes</b> , please state result	9,443.78 t CO <sub>2</sub>	-
Water Sources: Please list all sources e.g. lake, river, and local water authority.	<ul style="list-style-type: none"> <li>Local water authority</li> </ul>	Local water authority
Water Volume Used: (m <sup>3</sup> )	657	1012
Water Discharged: Please list all receiving waters/recipients.	<ul style="list-style-type: none"> <li>septic tank</li> </ul>	<ul style="list-style-type: none"> <li>septic tank</li> </ul>
Water Volume Discharged: (m <sup>3</sup> )	657	1012
Water Volume Recycled: (m <sup>3</sup> )	NA	NA
Total waste Produced (please state units)	673.259 KG	971.736 KG
Total hazardous waste Produced:	1.990 KG	6445 KG



<i>(please state units)</i>		
Waste to Recycling: <i>(please state units)</i>	673.259 KG	971.736 KG
Waste to Landfill: <i>(please state units)</i>	58.752 kg/year	64.320 kg/year
Waste to other: <i>(please give details and state units)</i>	NA	NA
Total Product Produced <i>(please state units)</i>	605.872.016,000 pieces	699.102.689 pieces

**10C: Business Ethics – 4-Pillar Audit**

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

To be completed for a 4-Pillar SMETA Audit

**10C. Compliance Requirements**

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

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

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

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

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

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

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

**10C. Guidance for Observations**

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

The supplier has received and acknowledged the Business Ethics policy of the auditor/audit company. The facility complies with all fiscal legislative requirements.

The facility has a designated person responsible for implementing standards concerning Business Ethics who are ÜMIT KAYA- QA ASURANCE MANAGER

The facility has a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Ethics.

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

Details:

Documents review

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

Observation	
<p><b>Description of observation:</b> None Observed</p> <p><b>Local law or ETI/Additional elements requirement:</b> NA</p> <p><b>Comments:</b> NA</p>	<p><b>Objective evidence observed:</b></p> <p>NA</p>

Good examples observed:	
<p>Description of Good Example (GE): None Observed</p>	<p><b>Objective Evidence Observed:</b></p> <p>NA</p>

<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>Please give details: The facility has a Business Ethics Policy and the policy was communicated and applied internally, externally.</p>
<p>B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?</p>	<p>The facility has conducted business ethics training to relevant employees.</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>Please give details: The policy updated when it is needed and monitored by ÜMİT KAYA- QA ASURANCE MANAGER</p>

D: Does the site require third parties including suppliers to complete their own business ethics training

Yes  
 No  
Please give details: NA

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

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

Not Applicable please x

# Photo Form

<p>OUTVIEW OF THE FACILITY</p>	<p>PRODUCTION AREA</p>	<p>SECONDARY CONTAINMENTS</p>
<p>FIRE HOSE</p>	<p>ELECTRICAL PANEL</p>	<p>PRODUCTION AREA</p>
<p>PPE</p>	<p>EYE WASH</p>	<p>BODY WASH</p>









<p>WARNING SIGN</p>	<p>WASTE STORAGE AREA</p>	<p>PRODUCTION AREA</p>

<p>FIRE EXIT DOOR</p>	<p>FIRE ALARM</p>	<p>POSTED ETI BASE CODE</p>

<p>PPPEP FIRE EXTINGUISHER</p>	<p>FIRE EXTINGUISHER</p>	<p>POTABLE WATER</p>

<p>EVACUATION PLAN</p>	<p>TOILET</p>	<p>WAREHOUSE</p>

		
<p>SUGGESTION BOX</p>	<p>ASSEMBLY POINT</p>	<p>LUNCH HALL</p>
		
<p>PRODUCTION AREA</p>	<p>MSDS</p>	<p>DR ROOM</p>



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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:](#)**

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