



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC5000008199	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS1000008633
Business name (Company name):	YUKSEL CEYLAN MOTORLU ARACLAR INSAAT GIDA HAYVANCILIK TARIM MADENCILIK SANAYI VE TICARET ANONIM SIRKETI YAKINKENT BENTONIT FABRIKA SUBESI		
Site name:	YUKSEL CEYLAN MOTORLU ARACLAR INSAAT GIDA HAYVANCILIK TARIM MADENCILIK SANAYI VE TICARET ANONIM SIRKETI YAKINKENT BENTONIT FABRIKA SUBESI		
Site address:	TUNEY KOYU ORGANIZE SANAYI BOLGESI MEVKII IKINCI CADDE PROSES BINASI NO:16/1 MERKEZ ÇANKIRI 18010 TR	Country:	TR
Site contact and job title:	Halime Çelik / Human Resources Responsible		
Site phone:	+908502021128	Site e-mail:	info@ceylanmineral.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar <input checked="" type="checkbox"/> Business Ethics
Date of Audit:	2024-02-12		

Audit Company Name:
SGS Turkey

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

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

Auditor Team			
Lead Auditor:	ERDEM YESILYURT	APSCA Number:	32200356
Additional Auditors:	GOKCE ERDOGAN		32200351
Date of declaration:	2024-02-12		

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

Site Representation	
Full Name:	Halime Çelik
Title:	Human Resources Responsible
Date of declaration:	2024-02-12
Comments:	<p><i>Any exceptions to this must be recorded here (e.g. different sample size):</i> <i>Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020).</i> <i>The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives</i></p>
None	

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
<u>0A - Universal rights covering UNGP</u>			0	0	0	
<u>0B - Management systems and code implementation</u>	0.B.4	§1	1	0	0	NC - ZAF600354363
<u>1 - Freely chosen employment</u>	1.2	§2	1	0	0	NC - ZAF600354366
<u>2 - Freedom of association and right to collective bargaining are respected</u>			0	0	0	
<u>3 - Working conditions are safe and hygienic</u>	3.1 3.1 3.1 3.1 3.1 3.1	§3 §4 §5 §6 §7 §8	6	0	0	NC - ZAF600354360 NC - ZAF600354362 NC - ZAF600354364 NC - ZAF600354365 NC - ZAF600354367 NC - ZAF600354374
<u>4 - Child labour shall not be used</u>			0	0	0	
<u>5 - Living wages are paid</u>			0	0	1	GE - ZAF600354359
<u>6 - Working hours are not excessive</u>	6.1 6.6	§10 §9	2	0	0	NC - ZAF600354361 NC - ZAF600354371
<u>7 - No discrimination is practiced</u>			0	0	0	
<u>8 - Regular employment is provided</u>			0	0	0	
<u>8A - Subcontracting and homeworking</u>			0	0	0	
<u>9 - No harsh or inhumane treatment is allowed</u>	9.2 9.2		2	0	0	NC - ZAF600354372 NC - ZAF600354373
<u>10A - Entitlement to work and immigration</u>			0	0	0	
<u>10B2 - Environment 2-pillar</u>			0	0	0	
<u>10B4 - Environment 4-pillar</u>	10.B4.1 10.B4.1		2	0	0	NC - ZAF600354369 NC - ZAF600354370
<u>10C - Business ethics 4-pillar</u>	10.C.1		1	0	0	NC - ZAF600354368

Local Law Issues

Issue	Description
§1	Regulation on Workplace Opening and Operating Permit, 10.08.2005 # 25902, Article 4: n) Establishment and operation license: Permission issued by competent authorities for the opening and operation of workplaces within the scope of this Regulation.
§2	OCCUPATIONAL HEALTH AND SAFETY LAW Law Number : 6331 Acceptance Date : 20/6/2012 Article 15
§3	REGULATION ON HEALTH AND SAFETY MEASURES TO BE TAKEN IN WORKPLACE BUILDINGS AND ADDITIONS Official Gazette Date: 17.07.2013 Number of Official Gazette: 28710
§4	REGULATION ON HEALTH AND SAFETY MEASURES TO BE TAKEN IN WORKPLACE BUILDINGS AND ADDITIONS Official Gazette Date: 17.07.2013 Number of Official Gazette: 28710

§5	In accordance with the Turkish Regulation on the Health and Safety Precautions Taken While Working with the Chemical Substances (12.08.2013), Art 7 - i - 3 Necessary measures shall be taken in case of fire or explosion arising from flammable and / or explosive materials; or to prevent workers from or to minimize the dangerous physical effects of chemically unstable substances or mixtures.
§6	Regulation on Protection of Buildings Against Fire (19.12.2007) Article 81-
§7	Occupational Health and Safety Law, Clause 11 - (1) a) Employer shall determine the possible emergency situations that probably affects the employees & workplace and take preventative actions considering the workplace, used materials, work equipment and environment. Regulation Regarding Health and Safety Measures for Handling with Chemical Substances, Clause 9 - (1) Following topics are covered by the training or information given to employees: (...) ç) Turkish Material Safety Data Sheets of the chemicals provided from the supplier. (...)
§8	HEALTH AND SAFETY REGULATIONS FOR THE USE OF WORK EQUIPMENT ANNEX-III (Amended:OJ-18/2/2022-31754) (6) MATTERS REGARDING MAINTENANCE, REPAIR AND PERIODIC CHECKS 2. Work equipment subject to periodic control 2.5. Industrial shelves and doors 2.5.1. Periodic controls of industrial shelves and doors are authorized; It is done by mechanical engineers, mechatronics engineers, civil engineers, technical teachers graduated from the department of construction, machinery and metal education, construction or mechanical technicians or high technicians. 2.5.2. Non-destructive testing methods can be used in the periodic controls of industrial shelves and doors. Non-destructive testing reports are kept in the annex of the periodic control report. 2.5.3. Periodic control criteria and control times of industrial shelves and doors are given in Table-5. Table-5: Periodic control times and control criteria of industrial shelves and doors 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.
§9	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.
§10	In accordance with the Turkish Regulation on the Occupational which are carried out by working of employees on shifts , art 9 The employees who work in shift should have at least 11 hours uninterrupted rest.

Site Details

Site Details		
Company Name	YUKSEL CEYLAN MOTORLU ARAÇLAR İNŞAAT GIDA HAYVANCILIK TARIM MADENCİLİK SANAYİ VE TİCARET ANONİM ŞİRKETİ YAKINKENT BENTONİT FABRİKA ŞUBESİ	
Site Name	YUKSEL CEYLAN MOTORLU ARAÇLAR İNŞAAT GIDA HAYVANCILIK TARIM MADENCİLİK SANAYİ VE TİCARET ANONİM ŞİRKETİ YAKINKENT BENTONİT FABRİKA ŞUBESİ	
GPS location (if available)	GPS Address:	40.37255880423483, 33.50284480145267
	Coordinates:	40°22'21.2"N 33°30'10.2"E
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Business Licence Number: 2023-1	
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Cat litter	
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	YÜKSEL CEYLAN MOTORLU ARAÇLAR İNŞAAT GIDA HAYVANCILIK TARIM MADENCİLİK SANAYİ VE TİCARET ANONİM ŞİRKETİ YAKINKENT BENTONİT FABRİKA ŞUBESİ was established in 2023 in Çankırı as a manufacturer of cat litter. Total factory closed area was 6.600 square meter. Monthly production capacity: 6.000 tonnes.	

Structure and number of buildings	Building Name:		1
	Floor	Description	Remark
	Ground	Lunch hall, pantry, dining hall, offices, changing rooms, lavatories, prayer rooms, infirmary, technical room, rest room, hydrophore	None
	1	Offices and restrooms	None
	2	Laboratories, accommodation rooms and offices	None
	Building Name:		2
	Floor	Description	Remark
	Ground	Packing section, forklift charging area	None
	Building Name:		3
	Floor	Description	Remark
	Ground	Loading area, offices, restrooms	None
	Building Name:		4
	Floor	Description	Remark
Ground	Pre-crushing, activation, drying, screening, crushing	None	
Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No visible structural integrity issue was observed.		
Does the site have a structural engineer evaluation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The company had a building structure construction permit that ensures the building had the seismic design in terms of architectural science.		
Site function	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack house <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-contractor		
Months of peak season	April to September		
Process overview	Pre-crushing, activation, drying, screening, crushing, packing		

What form of worker representation is there on site?	<input type="checkbox"/> Union <input checked="" type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other <input type="checkbox"/> None
Please give details:	Open door policy, complaint boxes
Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any on site provided worker accommodation buildings	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Confirmed with management interview. Depending on the situation, 1 worker (2% of total workers) can stay at related rooms.
Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Were all site provided accommodation buildings included in this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:

Audit Parameters		
Time in and time out	Day 1	
	In	09:00
	Out	17:00
Audit type:	FULL_INITIAL	
Was the audit announced?	SEMI_ANNOUNCED	
Was the Sedex SAQ available for review?	Yes	
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No	
Who signed and agreed CAPR	Halime Çelik / Human Resources Responsible	
Is further information available	No	

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	No	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	No	No
<i>Reason for absence at the opening meeting</i>	Firmada sendika bulunmamaktadır. Çalışan temsilcisi üretim prosesi ile meşguldü. / There was no union in the company. The worker representative was busy with production process.		
<i>Reason for absence during the audit</i>	Firmada sendika bulunmamaktadır. / There is no union in the company.		
<i>Reason for absence at the closing meeting</i>	Firmada sendika bulunmamaktadır. Çalışan temsilcisi üretim prosesi ile meşguldü. / There was no union in the company. The worker representative was busy with production process.		

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	35	0	0	0	0	0	0	35
Worker numbers - female	9	0	0	0	0	0	0	9
Total	44	0	0	0	0	0	0	44
Number of Workers interviewed - male	10	0	0	0	0	0	0	10
Number of Workers interviewed - female	4	0	0	0	0	0	0	4
Total - interviewed sample size	14	0	0	0	0	0	0	14

Nationalities Structure	
Nationality of Management	Turkish
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1: Turkish approx %: 100%
Was this list completed during peak season?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: This may not vary during peak seasons
Worker remuneration	Workers on piece rate: 0%
	Paid hourly: 100%
	Salaried: 0%
Payment cycle	Paid daily: 0%
	Paid weekly: 0%
	Paid monthly: 100%
	Other: 0%
	Details for other: None

Worker Interview Summary	
Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Number of group interviews:	1 group of 4 workers
Number of individual interviews:	Male: 6 Female: 4
All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favorable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
What was the most common worker complaint?	None
What did the workers like the most about working at this site?	Friendly environment, payment on time
Any additional comment(s) regarding interviews:	None
Attitude of workers to hours worked:	No complaint was raised regarding working hours
Is there any worker survey information available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

Attitude of workers:
Interviewed workers informed their pleasure about free lunch and transportation, friendly people and social insurance in the facility. No negative feedback was raised.
Attitude of worker's committee/union reps:
Sampled worker representative stated that workers have no complaints about their social benefits and working environment. Representative stated that they perform meetings with management as a committee on monthly basis to raise the complaints of the workers to management anonymously. No other complaint was raised.
Attitude of managers:
The company management was kind, cooperative, polite and transparent during the entire audit process.

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

0A: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

Confidential grievance system in place in order to raise the complaints regarding human rights issues.

Evidence examined:

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

Any other comments:

None

Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Human rights policy of the company was reviewed.
Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Confirmed with document review
Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Halime Çelik – Human Resources Responsible
Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Confidential grievance system in place in order to raise the complaints regarding human rights issues.

Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All documents of employees (such as ID copies etc.) were kept under controlled conditions by the accountant staff of the company. The company respects data privacy.
Measuring Workplace Impact	
Annual worker turnover (Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	Last year 100.0% This year 4.0%
Current % quarterly (90 days) turnover (Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	5.0%
Annual % absenteeism (Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	Last year 0.0% This year 0.0%
Quarterly (90 days) % absenteeism (Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month)	0.0%
Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Job related accident records were kept
Annual Number of work related accidents and injuries per 100 workers ((Number of work related accidents and injuries * 100) / Number of total workers)	Last year 0.0% This year 5.0%
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)	5.0%

Lost day work cases per 100 workers($[(\text{Number of lost days due to work accidents and work related injuries} * 100) / \text{Number of total workers}]$)	Last year	0.0%
	This year	5.0%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%

OB - Management Systems and code Implementation
[Summary of Findings]

OB: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

ETI Base Code was posted on notice board.
 Facility has appointed a senior member of management who is responsible for compliance with this code.
 The facility has disciplinary procedures and work rules. All posted onsite.
 All social compliance issues are managed and monitored internally.
 The employees have information regarding social compliance, social and legal rights.
 Facility has communicated this code to all employees and suppliers.
 Business license was available.

Evidence examined:

Confirmed with management interview, document review and facility tour.

Any other comments:

None

Management Systems

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

<p>If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Training records were reviewed. All employees were informed regarding social compliance policies at the beginning of recruitment and periodically.</p>
<p>Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>the company has ISO 14001:2015 certificate.</p>
<p>Is there a Human Resources manager/department?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>The Company has well designed HR department.</p>
<p>Is there a senior person /manager responsible for implementation of the code?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Halime Çelik – Human Resources Responsible</p>
<p>Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>All documents of employees (such as ID copies etc.) were kept under controlled conditions by the accountant staff of the company. The company respects data privacy.</p>
<p>Is there an effective procedure to ensure confidential information is kept confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>All documents of employees (such as ID copies etc.) were kept under controlled conditions by the accountant staff of the company. The company respects data privacy.</p>
<p>Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Internal assessments were conducted to evaluate policy and procedure effectiveness.</p>
<p>Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Corrective and preventative action process was in place.</p>
<p>Does the facility have a policy/code which require labour standards of its own suppliers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Company sends a copy of ETI Base Code to its suppliers.</p>
Land Rights	
<p>Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The company has business licence.</p>

<p>Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Owner of the company is responsible to conduct legal due diligence to recognise and apply national laws and practices relating to land title.</p>
<p>Does the site have a written policy and procedures specific to land rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The company building was established on a land which has the legal land title belongs to the owner. The company provided the structure permit as well.</p>
<p>Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The previous owner of the land was paid by the current land owner. The current land owner is also the owner of the building.</p>
<p>Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>N/A</p>
<p>Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>No any evidence of illegal appropriation of land for facility building or expansion of footprint.</p>

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600354363	
Clause	0B - Management Systems and code Implementation	
Issue Title	34 - Site is operating without all required in-date licences and permits (e.g. business / factory licence has expired)	
Subcategory	Site's licenses & Certifications	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Regulation on Workplace Opening and Operating Permit, 10.08.2005 # 25902, Article 4: n) Establishment and operation license: Permission issued by competent authorities for the opening and operation of workplaces within the scope of this Regulation.	
ETI code	0.B.4 - Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with.	
Explanation to the non compliance	Denetlenen firmanın işyeri açma ve çalıştırma ruhsatı; yalnızca 1905,71 m ² alanı olan, proses binası için düzenlenmiştir. / The license of the audited company was issued only for the process building with an area of 1905,71 m ² .	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	Lütfen tüm alanları kapsayan çalışma ruhsatı temin ediniz. It is recommended that the workplace opening and operating permit shall cover all areas.	

1 - Freely chosen Employment
[Summary of Findings]

1: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

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

Evidence examined:

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

Any other comments:

None

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

<p>Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p> <p>Please give details:</p> <p>The Company sends ETI Base Code to its supply chain.</p>
<p>Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The Company sends ETI Base Code to its supply chain and suppliers were visited occasionally in order to prevent forced / trafficked labour issues.</p>

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600354366	
Clause	1 - Freely chosen Employment	
Issue Title	80 - Workers incur fees, legal or otherwise, during the recruitment process	
Subcategory	Recruitment/termination	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	OCCUPATIONAL HEALTH AND SAFETY LAW Law Number : 6331 Acceptance Date : 20/6/2012 Article 15	
ETI code	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.	
Explanation to the non compliance	Firmada işe yeni başlayan çalışanların sağlık muayene ücretleri; işveren tarafından değil, çalışanlar tarafından ödenmektedir. / Health examination fees of new employees are paid by the employees, not by the employer.	
Follow up method	<input checked="" type="checkbox"/> Follow up audit <input type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	İşe giriş sağlık muayene ücretlerinin, işveren tarafından karşılanması önerilir. / It is recommended that the employer covers the cost of medical examinations at the start of employment.	

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

2: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

There is no union in the facility.
Suggestion and complaint boxes are in the facility.
There is an open-door policy that employees can complain directly to the top management.
Employees feel free to join trade union as per interviews.

Evidence examined:

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

Any other comments:

None

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	<input type="checkbox"/> Union <input checked="" type="checkbox"/> Other <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> None
Other details:	Open door policy and compliant boxes
Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Open door policy and compliant box systems were in place to ensure effective worker/management communication.
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: It was confirmed with worker interview that worker representatives are free to perform meetings with employees. Adequate facilities were provided by the management.
Name of union and union representative, if applicable:	There was no unionisation activity in the company.

Is there evidence of free elections?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	There was 1 freely elected worker representative onsite
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Confirmed with worker interviews
Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date of last election:	2023-07-31
Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, please state how many:	1.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Meetings between worker representative and management was performed regularly
Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

3: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

Working environment is generally safe. Risk assessment is up to date. Emergency evacuation plans are provided in the facility. Injury records are kept by facility. Minutes of meetings meet regularly between the H&S committee (workers) and the Company Owner, and each point is acted on. There were adequate first aid kits in each production area and they were well stocked. There are contracted occupational doctor and OHS expert. The risks and action plans regarding covid-19 pandemic are integrated with risk assessment report and emergency action plan report. The facility has taken the necessary measures to protect its employees from Coronavirus; PPE, hand disinfectant, compliance with social distance rule, etc. Emergency exits are clearly marked. There are emergency exits from each work area. Firefighting equipment checks are up-to-date. Training had been given by fire marshals had been specially selected for extra training. Fire alarm is provided and active. All electrical equipment, electricity panels, are maintained in good condition such as sockets, plugs, switches and main fuse boards. Potable water was freely available in all areas and test certificates were up-to-date. Enough clean toilets segregated by gender were available always to workers. Health certificates for kitchen operator and the hygiene certificate for the kitchen was up-to-date and legal.

Evidence examined:

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

Any other comments:

None

Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?

Yes No

Please give details:

Health and safety policy was prepared and communicated to all workers. There was an occupational health and safety specialist of the company.

Are the policies included in workers' manuals?

Yes No

Please give details:

H&S rules and procedures of the company were distributed to whole workforce in a documented way.

<p>Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: Workplace opening and operating permit (Business License) covers all areas.</p>
<p>Are visitors to the site informed on H&S and provided with personal protective equipment?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Visitors were informed on H&S and provided required personal protective equipment.</p>
<p>Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: There was an infirmary in the company which meets legal requirements.</p>
<p>Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: There were jobsite doctor and sufficient number of first aid certificated employees onsite. The first aid boxes are placed at every appropriate area.</p>
<p>Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: The company works with professional transportation company.</p>
<p>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>Please give details: Confirmed with site tour</p>
<p>Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Risk analysis was conducted</p>
<p>Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Confirmed with document review</p>
<p>Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: There was no banned chemical in the company</p>

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600354360	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	203 - Fire exits are inadequate by design/construction, location, etc.	
Subcategory	Fire Safety - Fire exits	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	REGULATION ON HEALTH AND SAFETY MEASURES TO BE TAKEN IN WORKPLACE BUILDINGS AND ADDITIONS Official Gazette Date: 17.07.2013 Number of Official Gazette: 28710	
ETI code	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.	
Explanation to the non compliance	Firmanın; idari bina ana giriş kapısı, yemekhane kapısı, personel giriş ve iç kapısı acil çıkış kapısı olarak tanımlı olup, aynı zamanda kayar kapıdır. / The company's administrative building main entrance door, dining hall door, personnel entrance and interior door are defined as emergency exit doors and are also sliding doors.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	Acil çıkış kapılarında sürgülü kayar kapı ve kepenk sistemleri bulunmamalıdır. / Emergency exit doors should not have sliding sliding doors and shutter systems.	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600354362	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	215 - Evacuation plan not adequately communicated to workers	
Subcategory	Fire Safety - Fire alarms & Evacuation	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	REGULATION ON HEALTH AND SAFETY MEASURES TO BE TAKEN IN WORKPLACE BUILDINGS AND ADDITIONS Official Gazette Date: 17.07.2013 Number of Official Gazette: 28710	
ETI code	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.	
Explanation to the non compliance	Firmada acil durum tahliye planları yer almamaktadır. / It was noted that there was no evacuation plan in the production.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	Uygun bir formatta acil durum tahliye planı sağlayınız. / It is recommended that provide an emergency evacuation plan in an appropriate format.	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600354364	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	240 - No / inadequate safety measures / anti-explosion measures for chemicals (e.g. no anti-leaking system / secondary container / unbunded)	
Subcategory	Chemicals	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	In accordance with the Turkish Regulation on the Health and Safety Precautions Taken While Working with the Chemical Substances (12.08.2013), Art 7 - i - 3 Necessary measures shall be taken in case of fire or explosion arising from flammable and / or explosive materials; or to prevent workers from or to minimize the dangerous physical effects of chemically unstable substances or mixtures.	
ETI code	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.	
Explanation to the non compliance	Firmada; paketlenme bölümünde, bakım odasında ve tehlikeli atık alanında, kullanılan kimyasalların altında ikincil kap bulunmamaktadır. / In the company; there are no secondary containers under the chemicals used in the packaging department, maintenance room and hazardous waste area.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	İlgili kimyasallar için ikincil kap sağlanmalıdır. / Secondary containers shall be provided for related chemicals.	

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Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600354365	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	195 - Emergency notification system (e.g. fire alarm) is not set up to notify all workers at the site, including on multiple floors	
Subcategory	Fire Safety - Fire alarms & Evacuation	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Regulation on Protection of Buildings Against Fire (19.12.2007) Article 81-	
ETI code	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.	
Explanation to the non compliance	Firmada merkezi yangın alarm sistemi bulunmamaktadır. Yemekhane ve soyunma odalarının bulunduğu idari bina ve üretim ayrı sistemlere sahiptir. / There is no central fire alarm system in the company. The administrative building, where the cafeteria and changing rooms are located, and production have separate systems.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	Lütfen binada merkez yangın alarm sistemi sağlayınız./ It is recommended that there shall be a central fire alarm system in the building.	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600354367	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	230 - No material safety data sheet (MSDS) obtained / available	
Subcategory	Chemicals	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Occupational Health and Safety Law, Clause 11 - (1) a) Employer shall determine the possible emergency situations that probably affects the employees & workplace and take preventative actions considering the workplace, used materials, work equipment and environment. Regulation Regarding Health and Safety Measures for Handling with Chemical Substances, Clause 9 - (1) Following topics are covered by the training or information given to employees: (...) ç) Turkish Material Safety Data Sheets of the chemicals provided from the supplier. (...)	
ETI code	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.	
Explanation to the non compliance	Firmada üretim alanın genelinde, SDS formu bulunmamaktadır. / There is no SDS form throughout the production area in the company.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	Lütfen malzeme güvenlik bilgi formlarını ilgili alana sağlayınız. / It is recommended that MSDS shall be provided to related area.	

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Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600354374	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	267 - No / inadequate certificates for inspections of machinery, or machines not registered as required by law	
Subcategory	Machinery	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	<p>HEALTH AND SAFETY REGULATIONS FOR THE USE OF WORK EQUIPMENT ANNEX-III (Amended:OJ-18/2/2022-31754) (6) MATTERS REGARDING MAINTENANCE, REPAIR AND PERIODIC CHECKS 2. Work equipment subject to periodic control 2.5. Industrial shelves and doors 2.5.1. Periodic controls of industrial shelves and doors are authorized; It is done by mechanical engineers, mechatronics engineers, civil engineers, technical teachers graduated from the department of construction, machinery and metal education, construction or mechanical technicians or high technicians. 2.5.2. Non-destructive testing methods can be used in the periodic controls of industrial shelves and doors. Non-destructive testing reports are kept in the annex of the periodic control report. 2.5.3. Periodic control criteria and control times of industrial shelves and doors are given in Table-5. Table-5: Periodic control times and control criteria of industrial shelves and doors 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.</p>	
ETI code	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.	
Explanation to the non compliance	Denetlenen firmada bulunan endüstriyel raf sistemlerine ait fenni muayene raporu bulunmamaktadır. / It was noted that there was no periodical inspection report of the industrial rack systems in the company	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	Lütfen ilgili ekipmanların fenni muayene raporlarını yaptırınız./ It is recommended that periodical inspection report of related equipment shall be conducted.	

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

4: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

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

Evidence examined:

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

Any other comments:

None

Legal age of employment:	15
Age of youngest worker found:	19
Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A

5 - Living Wages are Paid
[Summary of Findings]

5: Compliance Requirements

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

There was no employee under the legal minimum wage.
All employees are covered with social security.
All production employees' wages were calculated by hourly rate.
All employees are provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
Benefits of paid and annual leave were given to all employees.
All social insurance payments were passed on to the relevant authorities in a timely manner.

Evidence examined:

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

Any other comments:

None

Summary Information

Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 9.0 Per Week: 45.0 Per Month: 225.0	Actual Per Day: 9.0 Per Week: 45.0 Per Month: 225.0	NO
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: null	Actual Per Day: 2.0 Per Week: 8.0 Per Month: 8.0	NO
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 566.7 Per Week: null Per Month: 17002.0	Actual Per Day: 583.3 Per Week: 0.0 Per Month: 17500.0	NO

Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 850.1 Per Week: null Per Month: null	Actual Per Day: 850.1 Per Week: 0.0 Per Month: 0.0	NO
Wages Analysis:			
Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	10 samples from July 2023 10 samples from October 2023 10 samples from January 2024		
Are there different legal minimum wage grades? If Yes, please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details:		
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	17.500 TRY/month		
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 0.0% of workforce earning minimum wage 100.0% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	Bonus Scheme found: No bonus scheme was applied Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.		
What deductions are required by law e.g. social insurance? Please state all types:	Social insurance, tax, unemployment benefit		
Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Please list all deductions that have been made.	1. Social insurance 2. Tax 3. Unemployment benefit		
Please list all deductions that have not been made.	Above mentioned deductions were made by the company and paid to governmental social security system.		
Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: It was verified with interviews that all worked times were reflected on the provided records.		

<p>Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:</p>
<p>If yes, what was the calculation method used.</p>	<p><input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation <input type="checkbox"/> Other – please give details:</p>
<p>Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:</p>
<p>Are workers paid in a timely manner in line with local law?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Is there evidence that equal rates are being paid for equal work:</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: It was confirmed with worker interviews and document review.</p>
<p>How are workers paid:</p>	<p><input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other</p>

Good Example		Evidence
[Back to findings summary]		
Good Example		
Status	OPEN	
Reference	ZAF600354359	
Clause	5 - Living Wages are Paid	
Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	
Subcategory	Benefits & Insurance	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Explanation to the good example	Firma çalışanlarına ücretsiz yemek ve ulaşım hizmeti sağlamaktadır. / The company provides free meal and transportation to its employees.	
Evidence	Çalışan görüşmeleri, yönetim beyanı, döküman inceleme / Worker interviews, management declaration, document review	

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

6: Compliance Requirements

- 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.
- 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.
- 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
- 6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.
- 6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where all of the following are met:
- 6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

Current Systems and Evidence Examined

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

Current Systems:

Through employees' interview, overtime was voluntary.
Records and employee interviews showed that workers had at least 2 day off per week.

Evidence examined:

The company has started to activity and use proper time recording based on computerized system from establishment.

Any other comments:

None

Working hours' analysis

Systems & Processes

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

Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input checked="" type="checkbox"/> No (please explain)
Please give details	It was found that employees did not use 1 day of paid rest leave after 6 days of work in the selected months. Details: -4 out of 10 sampled employees took a maximum of 1 time off for 10 consecutive days in January 2024
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):	10
Standard/Contracted Hours worked	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No % of workers: null% Frequency:
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Regulation based on working hours related to labour law (Official gazette date; 06.04.2004 / 25425; Art 5; By written agreement of both sides; weekly regular working hours can be distributed to working days without exceeding 11 hours a day. This arrangement could be made within 2 months window and total regular working time could not exceed obligated regular working time within this period.
Overtime Hours worked	
Actual overtime hours worked in sample (State per day/week/month)	January 2024: Daily 2 hours, Weekly 8 hours, Monthly 8 hours July 2023: Daily 1 hour, Weekly 1 hour, Monthly 1 hour October 2023: Daily 0 hour, Weekly 0 hour, Monthly 0 hour
Combined hours (standard or contracted + overtime hours = total) over 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A
Approximate percentage of total workers on highest overtime hours:	20.0%
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information Please give details: Confirmed with worker interviews
Overtime premium	

Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A - there is no legal requirement to OT premium Please give details: 150% of hourly wage for each working practice duration over 45 hours/week.
Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No All employees who work overtime is paid monthly in accordance with the law.
If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay <input type="checkbox"/> Collective Bargaining agreements <input checked="" type="checkbox"/> Other
Please give details	N/A
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other)	<input checked="" type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week is voluntary <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify)
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	N/A
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Non-Compliance		Evidence																														
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<table border="1"> <thead> <tr> <th colspan="2">Non-Compliance</th> </tr> </thead> <tbody> <tr> <td>Status</td> <td>OPEN</td> </tr> <tr> <td>Reference</td> <td>ZAF600354361</td> </tr> <tr> <td>Clause</td> <td>6 - Working Hours are not Excessive</td> </tr> <tr> <td>Issue Title</td> <td>485 - Workers do not take off 1 day in 7, and this is contrary to law or collective bargaining agreement (CBA) – systemic</td> </tr> <tr> <td>Subcategory</td> <td>Rest breaks and rest days</td> </tr> <tr> <td>New or carried over?</td> <td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td> </tr> <tr> <td>Root cause</td> <td><input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other</td> </tr> <tr> <td>Root cause - Other</td> <td></td> </tr> <tr> <td>Local law issue</td> <td>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. 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Actions	6 günlük çalışmanın ardından en az 24 saat kesintisiz ücretli izin verilmelidir / It is recommended that at																															

	least 24 hours uninterrupted paid resting break should be provided after 6 consecutive days work.	
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Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600354371	
Clause	6 - Working Hours are not Excessive	
Issue Title	493 - Rest breaks between shifts are not taken as required - systemic	
Subcategory	Rest breaks and rest days	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	In accordance with the Turkish Regulation on the Occupational which are carried out by working of employees on shifts , art 9 The employees who work in shift should have at least 11 hours uninterrupted rest.	
ETI code	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.	
Explanation to the non compliance	Firmada örneklenen 10 çalışandan 4 çalışana vardiya değişimlerinde 11 saatten az dinlenme süresi sağlandığı not edilmiştir. (Max 8 saat/gün, Ocak 2024) / It was noted that 4 out of 10 sampled workers in the company were provided with less than 11 hours of rest time at shift changes (Max 8 hours/day, January 2024).	
Follow up method	<input checked="" type="checkbox"/> Follow up audit <input type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	İki vardiya arasında en az 11 saatlik dinlenme süresi sağlanmalıdır. / It is recommended that at least 11 hours resting break should be granted between two shifts	

7 - No Discrimination is Practiced
[Summary of Findings]

7: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

There was no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation. Confirmed with management & employee interviews as well as document review in accordance with SMETA Best Practice Guidance and Local Law. No evidence against discrimination requirements of the client was found during the audit processes. Employees stated that they were paid and treated equally.

Evidence examined:

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

Any other comments:

None

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 33.0%	Female: 67.0%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	6	
Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	<input type="checkbox"/> Hiring <input type="checkbox"/> Promotion	<input type="checkbox"/> Compensation <input type="checkbox"/> Termination or retirement
		<input type="checkbox"/> Access to training <input checked="" type="checkbox"/> No evidence of discrimination found
Please give details	Confirmed with worker interviews	
Professional Development		
What type of training and development are available for workers?	All workers were given occupational health and safety and quality trainings periodically. Discrimination policy and procedure training are given to employees.	
Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

8 - Regular Employment Is Provided
[Summary of Findings]

8: Compliance Requirements

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current Systems:

All workers have their well-prepared personal files and signed labour contracts.
Labour contracts were in accordance with the laws and regulations.
A copy of employment contract was given to employees.
All employees were registered to the social security.
Employees are not required to sign blank papers.

Evidence examined:

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

Any other comments:

None

Responsible Recruitment

All Workers

Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?

- | | |
|--|---|
| <input checked="" type="checkbox"/> Terms & Conditions presented | <input checked="" type="checkbox"/> Understood by workers |
| <input checked="" type="checkbox"/> Same as actual conditions | |

Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)

- Yes No
Health examination fees of new employees are paid by the employees, not by the employer.

If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Application costs <input type="checkbox"/> Placement fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Medical screenings <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Other (please specify)	<input type="checkbox"/> Service fees <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Certifications <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Birth certificates <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any relocation costs after commencement of employment <input checked="" type="checkbox"/> Medical exam fees <input type="checkbox"/> Any other non-monetary assets
If any checked, give details	Health examination fees of new employees are paid by the employees, not by the employer.	
Migrant Workers		
Type of work undertaken by migrant workers:	There was no migrant worker in the company.	
Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0	
Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A	
Is there any observation on this finding?	N/A	
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Non-employee workers		
Recruitment Fees		
Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Agency Workers (if applicable) (Workers sourced from a local agent who are not directly paid by the site, but paid by the agency. Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)		
Number of agencies used (average):	0	
Please provide the names of agencies if applicable	N/A	
Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there a legal contract agreement with all agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A
Does the site have a system for checking labour standards of agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A
Contractors (Contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider.)	
Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A
Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A

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

8A: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

There is no process which is outsourced.

Evidence examined:

Site tour (Calculation on total production and estimated capacity), materials in/out records, management interview, worker interviews

Any other comments:

None

Summary of sub-contracting – if applicable

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

Summary of homeworking – if applicable

Is homeworking used at this site? Yes No

Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600354372	
Clause	9 - No Harsh or Inhumane Treatment is Allowed	
Issue Title	588 - Workers report that grievances are not satisfactorily addressed and resolution is not communicated	
Subcategory	Grievance Procedures	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
ETI code	9.2 - companies should provide access to a confidential grievance mechanism for all workers	
Explanation to the non compliance	Firmada bulunan dilek ve şikayet kutusunun, çalışan temsilcisi eşliğinde açıldığına dair kayıtlar görülememiştir. Söz konusu bulgu masaüstü olarak kapatılabileceği için, bulgu masaüstü olarak değerlendirilmiştir. / There is no record of the petition and complaint box in the company being opened in the presence of an employee representative. Since this finding can be closed as desktop, the finding was evaluated as desktop.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	Dilek ve şikayet kutusunun açılmasına dair sürece katılan herkesin kayıt altına alınması önerilir. / It is recommended to record everyone involved in the process of opening the wish and complaint box.	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600354373	
Clause	9 - No Harsh or Inhumane Treatment is Allowed	
Issue Title	588 - Workers report that grievances are not satisfactorily addressed and resolution is not communicated	
Subcategory	Grievance Procedures	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
ETI code	9.2 - companies should provide access to a confidential grievance mechanism for all workers	
Explanation to the non compliance	Firmada dilek ve şikayet kutusu değerlendirme sonuçları, çalışanlarla paylaşılmamaktadır. Söz konusu bulgu masaüstü olarak kapatılabileceği için, bulgu masaüstü olarak değerlendirilmiştir. / In the company, the evaluation results of the suggestion and complaint box are not shared with employees. Since this finding can be closed as desktop, the finding was evaluated as desktop.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	Dilek ve şikayet kutusu değerlendirme sonuçlarının, çalışanlarla paylaşılması önerilir. / It is recommended that the results of the evaluation of the suggestion and complaint box are shared with employees.	

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

10A: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

No migrant employee in the facility.

Evidence examined:

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

Any other comments:

None

10B4 - Environment 4–Pillar
[Summary of Findings]

10B4: Compliance Requirements
 10.B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.
 10.B4.2 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.
 10.B4.3 Businesses shall be aware of their end client’s environmental standards/code requirements
 10.B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.
 10.B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.
 10.B4.6 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).
 10.B4.7 Businesses shall make continuous improvements in their environmental performance.
 10.B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation
 10.B4.9 Businesses should have a nominated individual responsible for co-ordinating the site’s efforts to improve environmental performance.
 10B4: Guidance for Observations
 10.B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.
 10.B4.11 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:

Environmental impact assessment exception decision letter was obtained from authorized body.
 Environmental permit was obtained from authorized body.
 There is no obvious pollution in the factory.
 Employees were given environmental training.
 An industrial waste management plan was available.

Evidence examined:

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

Any other comments:

None

Environmental Analysis

Is there a manager responsible for Environmental issues (Name and Position):	Tuğçe IŞIK BAZ - Facility Environment Advisor
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 Please give details: Available

Does the site have a recognised environmental system certification such as ISO 14000 or equivalent?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The company has ISO 14001:2015 certificate.
Does the site have an Environmental policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, is it publicly available?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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 Please give details: Environment Policy Available.Important Environment Activities Are Mentioned
Does the site have a Biodiversity policy?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Sustainability Policy is Available.
Have all legally required permits been shown?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All Legal Permissions are Available
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"/> Not Applicable Please give details: Chemical Inventory Lists are Available
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not available
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 Please give details: Savings in Use of Natural Sources Precautions are Available
Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Waste recycling records are available Wastes Quantities are recording
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 Please give details: Use of water, energy and natural sources are monitoring and keeping records.

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 Please give details: Available	
Usage/Discharge analysis		
Criteria	Previous year: 2023	Current year: 2024
Electricity Usage: Kw/hrs	1896333	135000
Renewable Energy Usage: Kw/hrs	0	0
Gas Energy Usage: Kw/hrs	100000	2500
Has site completed any carbon Footprint Analysis?	No	No
If Yes, please state result		
Water Sources	Urban water uses available.	Urban water uses available.
Water Volume Used	2986	0
Water Discharged	Waste water uses are stocking in septic tank until Yakinkent Organized Industrial Zone complete.	Waste water uses are stocking in septic tank until Yakinkent Organized Industrial Zone complete.
Water Volume Discharged	123552	0
Water Volume Recycled	0	0
Total waste produced	Cause of the facility not completed the one year from the opening, the quantity of the wates are cannot predictable	Waste statements will be in the year of 2024
Total hazardous waste produced	Estimated per year 100 Kg	0
Waste to recycling	No waste has been sented to licensed companies yet	0
Waste to landfill	1727,44 kg per month 20.729,28 per year	0
Waste to other	In facility, unharmlful packaging wastes are available.	0
Total Product Produced	8000	5000

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600354369	
Clause	10B4 - Environment 4-Pillar	
Issue Title	603 - No competent individual responsible for co-ordinating the site's efforts to improve environmental performance	
Subcategory	General Environmental Permits, & Management systems	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
ETI code	10.B4.1 - Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.	
Explanation to the non compliance	Firmada çevre ile ilgili atanmış bir sorumlu bulunmamaktadır. / There is no appointed environmental officer in the company.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	Firmada çevre ile ilgili atanmış bir kişi olması tavsiye edilir. / It is recommended to have a designated environmental person in the company.	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600354370	
Clause	10B4 - Environment 4-Pillar	
Issue Title	608 - No public / external reporting on environmental performance and it is required by law	
Subcategory	General Environmental Permits, & Management systems	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
ETI code	10.B4.1 - Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.	
Explanation to the non compliance	Firmada çevre ile ilgili dış dikayet mekanizması bulunmamaktadır. / The company does not have an external grievance mechanism related to the environment.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	Firmada çevre ile ilgili dış şikayet mekanizması bulunması tavsiye edilir. / It is recommended that the company has an external environmental grievance mechanism.	

10C - Business Ethics – 4-Pillar Audit
[Summary of Findings]

10C: Compliance Requirements

- 10.C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.
- 10.C.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.
- 10.C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.
- 10.C.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.
- 10.C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,
- 10.C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics
- 10.C.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
- 10.C.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.
- 10.C.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 company has a designated person responsible for the implementation of standards regarding business ethics.
 There was a business ethics policy that covered the issue of bribery, corruption, or fraud of any kind.
 Responsible persons have been trained on business ethics.
 No unethical behavior was observed during the entire audit process.
 There was a transparent system for reporting unethical issues to senior management without the risk of retaliation. The company has corporate online communication and complaint line.

Evidence examined:

Policies, procedures were reviewed.

Any other comments:

None

Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?

- Internal Policy
- Policy for third parties including suppliers

Please give details:

The company has documented business ethic policy including procedure in the case of bribery situations.

<p>Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Confirmed during interviews and document review.</p>
<p>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: Confirmed during interviews and document review.</p>
<p>Does the site require third parties including suppliers to complete their own business ethics training</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Confirmed during interviews and document review.</p>

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600354368	
Clause	10C - Business Ethics – 4-Pillar Audit	
Issue Title	658 - Lack of detailed Business Ethics policy concerning bribery, corruption or unethical business practices (e.g. fraud, tax evasion, political interest, anti-competitive practices, extortion or money laundering, etc.)	
Subcategory	BE - Systems to manage compliance	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
ETI code	10.C.1 - Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.	
Explanation to the non compliance	Firmada iş etiğiyle ilgili atanmış bir sorumlu bulunmamaktadır. / There is no appointed responsible for business ethics in the company. /	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	Firmada iş etiği ile ilgili atanmış bir kişi olması tavsiye edilir. / It is recommended to have a designated person in the company related to business ethics.	

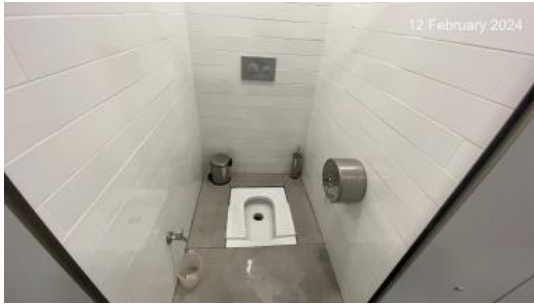
Attachments



Time recording device.JPG



Security cab.JPG



Restroom.JPG



Production area.JPG



Production area (7).JPG



Storage area.JPG



Production area (5).JPG



Production area (6).JPG



Production area (4).JPG



Production area (3).JPG



Production area (2).JPG



Potable water.JPG



Lunch hall.JPG



Praying room.JPG



Outside view of the company.JPG



Lavatories.JPG



12 February 2024

Grievance and suggestion box.JPG



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First aid box.JPG



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Fire hose and fire extinguisher cabinet.JPG



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Fire extinguisher.JPG



12 February 2024

Fire hose testing.JPG



12 February 2024

Fire extinguisher pressure gauge.JPG



12 February 2024

Fire alarm button.JPG



12 February 2024

Emergency exit door.JPG



Dressing room.JPG



Electricity panel with rubber mat.JPG



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

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