

# Sedex Members Ethical Trade Audit Report

## Version 6.1



Audit Details							
Sedex Company Reference: (only available on Sedex System)	ZC419834169       Sedex Site Reference: (only available on Sedex System)						
Business name (Company name):	ASIR GROUP IHRAC	AT AN	ONIM SIRKETI				
Site name:	ASIR GROUP IHRAC	AT AN	ONIM SIRKETI				
Site address:	Ziya Gökalp, 10. Caddesi, İkitelli Osb/Başakşehir/İstanbul, Turkey 34 PORTALL PLAZA NO:7D/5 ISTANBUL 34944 TR				TR		
Site contact and job title:	Mr Aykut Acar / Mar	nager					
Site phone:	002124387550	7550 Site e-mail:			r.bakacak@asirgroup.co m		
SMETA Audit Pillars:	Labour Standards		Health and Safety (plus Environment 2-Pillar)	Environ 4-pillar		Business Ethics	
Date of Audit:	2024-04-08						

Audit Company Name:	
GSCS International Ltd	

Audit Conducted By							
Affiliate Audit Company	N	Purchaser		Retailer			
Brand owner		NGO		Trade Union			
Multi- stakeholder			Combined Audit	select all that app	ly)		



2



## 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:	Emrah Guney	APSCA Number:	21705344			
Additional Auditors:	Rasim Sancakli		21705245			
Date of declaration:	2024-04-04	-				

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:	Mr Aykut Acar			
Title:	Manager			
Date of declaration:	2024-04-04			
Comments:				

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

N/A



## **Summary of Findings**

Issue	Area of Non–Conformity		Nun	nber of iss	ues	Findings
(please click on the issue title to go direct to the appropriate audit results by clause)	ETI	Local Law	NC	Obs	GE	
0A - Universal rights covering UNGP			0	1	0	Obs - ZAF600407294
<u>OB - Management systems and code</u> implementation			0	0	0	
<u>1 - Freely chosen employment</u>			0	0	0	
2 - Freedom of association and right to collective bargaining are respected			0	0	0	
<u>3 - Working conditions are safe and hygienic</u>			0	0	0	
4 - Child labour shall not be used			0	0	0	
5 - Living wages are paid			0	0	1	GE - ZAF600477937
6 - Working hours are not excessive			0	0	0	
7 - No discrimination is practiced			0	0	0	
8 - Regular employment is provided	8.1		1	0	0	NC - ZAF600407293
8A - Subcontracting and homeworking			0	0	0	
<u>9 - No harsh or inhumane treatment is</u> <u>allowed</u>			0	0	0	
<u> 10A - Entitlement to work and immigration</u>			0	0	0	
<u> 10B2 - Environment 2–pillar</u>			0	0	0	
<u> 10B4 - Environment 4–pillar</u>			0	0	0	
<u>10C - Business ethics 4-pillar</u>			0	0	0	

ate:End Date:4-082024-04-08



### **Site Details**

Site Details						
Company Name	ASIR GROUP IHRACA	T ANONIM	SIRKETI			
Site Name	ASIR GROUP IHRACAT ANONIM SIRKETI					
GPS location (if available)	GPS Address:		10 Cad. 34	ess: İkitelli OSB Mah 4 Portall Plaza Başakşehir – İstanbul		
	Coordinates:		Longitude	41.09633309004437, e: 4011069832		
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Tax title: 0861425047 30.12.2021 Environmental Licence for contracted recycling companies: 35848554-150/E.1032. EIA and environmental permission E-71280893-220.03-3290133 dated on 31.03.2022. Chamber of Commerce membership:900867-0 dated on 06.01.2022.					
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Handling and Storag	e services.				
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	ASIR GROUP IHRACAT ANONIM SIRKETI, kitelli OSB Mah 10 Cad. 34 Portall Plaza No:7D/5 Başakşehir – İstanbul, Turkey. The building is owned by the factory owners and built in 2021. They started to produce same year at the facility. The facility consists of one building with 4 floors. 1st and 2nd floors are occupied by Asır group. Admin offices and all operations placed in first floor and in second floor placed meeting room and management. Total closed area of company is 9.000 sqm and production area is 9.000 sqm. Facility is operational in a concrete building.					
Structure and number of buildings	Building Name:		Building1			
	Floor	Description	า	Remark		
	Floor1	Storage, l lunch roo	nandling, m	Asır Group		
	Floor2	Storage, d	lressing	Asır Group		
	Floor3	Another c	ompany	Aras Kargo		
	Floor4	Another c	ompany	Aktay Turizm		
Visible structural integrity issues (large cracks) observed?	🗆 Yes 🗹 No					
	Please give details:					
	Building has no cracl	<s.< td=""><td></td><td></td></s.<>				
Does the site have a structural engineer evaluation?	🗹 Yes 🗆 No					
	Please give details:					
	It is not required. The	e facility on	ly has hab	itant license		

6



Site function	□ Agent		Factory Processing/Manufacturer		
	Finished Product Supplier		Grower		
	Homeworker		Labour Provider		
	Pack house		Primary Producer		
	Service Provider		Sub-contractor		
Months of peak season	June to August				
Process overview	Handling and storage services.				
What form of worker representation is		$\checkmark$	Worker Committee		
there on site?	🗆 Other		None		
Please give details:	The freely chosen worker representatives (1 female, 1 male) is in charge for the purpose. The Procedure, election records (06.01.2022) seen/checked. The union is not mandatory in Turkish Legal System.				
Is there any night production work at the site?	🗆 Yes 🗹 No				
Are there any on site provided worker	🗆 Yes 🗵 No				
accommodation buildings	Please give details:				
Are there any off site provided worker	🗆 Yes 🗹 No				
accommodation buildings	Please give details:				
Were all site provided accommodation	🗆 Yes 🗹 No				
buildings included in this audit	Please give details:				
	The Facility has no accommodation.				





Audit Parameters						
Time in and time out	Day 1					
	In	09:00				
	Out	18:00				
Audit type:	PERIODIC					
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	Mr Aykut Acar / N		lanager			
Is further information available	No					



Audit attendance	Management	Worker Representatives			
	Senior management	Worker Committee representatives	Union representatives		
A: Present at the opening meeting?	Yes	Yes	No		
B: Present at the audit?	Yes	Yes	No		
C: Present at the closing meeting?	Yes	Yes	No		
Reason for absence at the opening meeting	The facility has freely elected employee representatives. The Union is not mandatory in Turkey Legal System. Since there is no union, there is no union representative. The management and chief employee representative attended the opening meeting.				
Reason for absence during the audit	The facility has freely elected employee representatives. The Union is not mandatory in Turkey Legal System. Since there is no union, there is no union representative. The management and chief employee representative attended the audit				
Reason for absence at the closing meeting	The facility has freely elected employee representatives. The Union is not mandatory in Turkey Legal System. Since there is no union, there is no union representative. The management and chief employee representative attended the closing meeting.				

9



## 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	
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	workers	Total
Worker numbers – male	130	0	0	0	0	0	0	130
Worker numbers – female	51	0	0	0	0	0	0	51
Total	181	0	0	0	0	0	0	181
Number of Workers interviewed – male	20	0	0	0	0	0	0	20
Number of Workers interviewed – female	6	0	0	0	0	0	0	6
Total – interviewed sample size	26	0	0	0	0	0	0	26





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?	<ul><li>☑ Yes □ No</li><li>Please give details:</li></ul>					
Worker remuneration	Workers on piece rate:	0%				
	Paid hourly:	0%				
	Salaried:	100%				
Payment cycle	Paid daily:	0%				
	Paid weekly:	0%				
	Paid monthly:	100%				
	Other:	0%				
	Details for other:	There is no other payments.				





W	orker Interview Summary
Were workers aware of the audit?	🗹 Yes 🗆 No
Were workers aware of the code?	🗹 Yes 🗆 No
Number of group interviews:	4 group of 5
Number of individual interviews:	Male: 3 Female: 3
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.	☑ Yes  ☐ No Please give details:
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	☑ Yes □ No
In general, what was the attitude of the workers towards their workplace?	🖂 Favorable 🛛 🗆 Non-favourable 🖓 Indifferent
What was the most common worker complaint?	There was no specific complaints.
What did the workers like the most about working at this site?	They mentioned payments were on time, and this job was opportunity for them. The fact that one of the weekly holidays is on Monday facilitates hospital and official work.
Any additional comment(s) regarding interviews:	The workers were happy to work for this facility.
Attitude of workers to hours worked:	They work 9 hours a day, and 5 or 6 days of week. According to interviews with the workers, they prefer to work only normal days of the week and prefer to stay at home on weekends.
Is there any worker survey information available?	□ Yes ☑ No Please give details:

End Date: 2024-04-08





#### Attitude of workers:

The factory allowed the auditor from GSCS International Ltd to conduct confidential worker interviews. The workers were chosen freely without any influence by the factory management; 10 workers;(1 group of 4 & 6 individuals) were randomly selected by auditor from different sections for interview. Workers see the company's presence here as a chance. During the employee interviews, they mentioned that the payments are made on time, that they receive the training they need in the business environment, and that the common areas are hygienic. They stated that they knew the worker representatives and that they were able to convey the problems they encountered to the management through the worker representative. They answered the questions clearly. In addition, the factory has formed own task force, SOP, risk assessments and they are monitoring these issues regularly.

Attitude of worker's committee/union reps:

During Interview, the worker representative expressed that the facility management was nice to them, they could freely express their opinions, will, advice and suggestion without any fear or concern and they could make grievance if necessary. No negative information was observed during the audit.

Attitude of managers:

The management was found to be well versed with the requirements of social audit, management was very co-operative and transparent during the course of the audit. They were receptive towards findings. The management approach was found to be positive.





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

**0A: Compliance Requirements** 

0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers. 0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights

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

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

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

0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter. Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

#### Current Systems and Evidence Examined To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems. **Current Systems:** The facility had a policy, endorsed at the highest level, covering human rights impacts and issues, and it is communicated to all appropriate parties, including its own suppliers. •The facility has responsible person for implementation and monitoring The facility measured their direct, indirect, and potential impacts on stakeholders (rights holders) human rights. •Where businesses have an adverse impact on human rights within any of their stakeholders, they address these issues and enable effective remediation. •The facility had a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the report. •The facility has policy and procedures for human rights. •It is communicated to all appropriate parties, including suppliers through the responsible person. **Evidence examined:** 1. Documentation files were reviewed. It stipulates complying with Human Rights, written policies and procedure that being provided individually to employees. 2. Letter of Authorization on implementing Human Rights

3. Impact for Human Rights assessment report

4. Management interview and employee interview.

#### Any other comments:

None.

Policy statement that expresses commitment to respect human rights?	<ul><li>☑ Yes □ No</li><li>Please give details:</li></ul>
	Please give details.
	The facility had posted the policy about respecting Human Rights in the policy board stated.
Are the policies included in workers' manuals?	🗆 Yes 🗵 No
	Please give details:
	The facility has not published any workers' manuals. Instead, policies included in workers' training materials, special mandatory training was organized, and attendance records seen/checked.

Audit company:	Report reference:	Start Date:	End Date:	1
GSCS International Ltd	ZAA600056731	2024-04-08	2024-04-08	Sedexglobal.com



Does the business have a designated	🗹 Yes 🗆 No	
person responsible for implementing standards concerning Human Rights?	Please give details:	
	Mr. Aykut Acar - Tax l person. He was appo seen/checked.	Director of factory is the responsible inted on 05.11.2023. The special letter
Does the business have a transparent	🗹 Yes 🗆 No	
system in place for confidentially reporting, and dealing with human rights	Please give details:	
impacts without fear of reprisals towards the reporter?	confidentiality procee with human rights im	lished an effective data and identity dure and a transparent system dealing ppacts without fear of reprisals towards ct privacy information.
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	☑ Yes 🗆 No	
Does the business demonstrate effective data privacy procedures for workers'	🗹 Yes 🗆 No	
information, which is implemented?	Please give details:	
	The facility establishe workers' information information.	ed an effective data privacy procedure for to protect the workers' privacy
Me	asuring Workplace Imp	act
Annual worker turnover (Number of	Last year	7.0%
workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	This year	3.0%
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])	2.0%	
Annual % absenteeism(Number of days	Last year	0.0%
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)	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%	

Start Date:End2024-04-08202



Are accidents recorded?	☑ Yes 🗆 No	
	Please give details:	
	In case of any work accident, th the accidents by making legal r occupational accidents during t	notifications. There were no
Annual Number of work related	Last year	0.0%
accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	This year	0.0%
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)	0.0%	
Lost day work cases per 100	Last year	0.0%
workers([(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	This year	0.0%
% of workers that work on average more than 48 standard hours / week in the last	6 month	0.0%
6 / 12 months	12 month	0.0%
% of workers that work on average more	6 month	0.0%
than 60 total hours / week in the last 6 / 12 months	12 month	0.0%





Observation		Evidence	
[Back to findings	summary]		
	Observ	ation	
Status	CLOSED		
Reference	ZAF600407294		
Clause	0A - Universal Righ	its covering UNGP	
Issue Title	6 - SAQ was shared answers are accide	d with the auditor, but the SAQ entally misleading / inaccurate	
Subcategory	Audit process		
New or carried over?	🗆 New	Carried Over	
Raised by audit	ZAA420650648		
Resolved by audit	ZAA600056731		
Root cause	🗆 Training	🗆 System	
	🗆 Costs	Lack of workers	
	🗹 Other		
Root cause - Other	N/A		
Explanation to the observation	It was noted that the SAQ had not been completed. The factory management explained that they had not been aware how to fill up the SAQ. However, they had started this work, and would finalise the SAQ within the next week.		
Actions	N/A		
Additional comments	facility uploaded S. facility uploaded S.	AQ AQ	





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

0B: Compliance Requirements

0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code. 0.B.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.

0.B.3 Suppliers are expected to communicate this Code to all employees. 0.B.4 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with. 0.B.5 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

#### Current Systems and Evidence Examined

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

#### **Current Systems:**

Responsibility for meeting the legal and client code requirements is taken by Mr. Aykut Acar - Tax Director. •The facility communicated this code of conduct (COC) to the suppliers and employees.

 The facility management is conducting internal social compliance audit regularly and take necessary corrective action based on report.

•The facility arranged mid-level management training for all mid-level management employees such as supervisors, quality in charge, production officers, etc.

•The facility conducts orientation training for all new employees.

•The facility conducted training to the employees on ETI base code.

 Implementation of any necessary changes is then given to the individual department heads after agreement with the facility manager.

#### **Evidence examined:**

 Facility Code of Conduct (COC). •All policies of facility. •Legal license (Factory, Fire, Trade) Internal audit records. •Management employee training, training attendance record •Management / Worker Interviews Meeting records.

Any other comments:

None.

	Management Systems
In the last 12 months, has the site been subject to any fines/prosecutions for non–compliance to any regulations?	□ Yes ☑ No Please give details:
	The establishment of the facility is 3 months old. In the last 3 months, the site has not been subjected to any fines or prosecutions for non-compliance to any regulations.
Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<ul> <li>Yes D No</li> <li>Please give details:</li> <li>It was noted through documentation review, facility has policies and procedures for reduce the risk of forced labor, child labor, discrimination, harassment &amp; abuse.</li> </ul>



If Yes, is there evidence (an indication) of effective implementation? Please give details.	Through documents review and workers interview, the written policies (No forced labour, no child labour, Non-discrimination, working hours, health & safety, harassment and abuse) were communicated to the workers as much as factory mid-level management & workers were informed by training via notification board and training.
Have managers and workers received training in the standards for forced	🗹 Yes 🗆 No
labour, child labour, discrimination, harassment & abuse?	Please give details:
	All the managers and workers in the facility have received orientation training where standards for forced labour, child labour discrimination, harassment & abuse are covered. Training records of 10.11.2023 seen and checked.
If Yes, is there evidence (an indication) that training has been effective e.g.	🗹 Yes 🗆 No
training records etc.? Please give details	Please give details:
	Training records were found including attendance sheet. Training records of 10.11.2023 seen and checked.
Does the site have any internationally recognised system certifications e.g. ISO	🗆 Yes 🗹 No
9000, 14000, OHSAS 18000, SA8000 (or other social audits)?	Please give details:
	The facility has no internationally recognized system certifications.
Is there a Human Resources manager/department?	☑ Yes □ No
	There is a Human Responsible in the company. Zeynep Odabas / HR
	Manager was present during the day.
Is there a senior person /manager responsible for implementation of the	☑ Yes □ No
code?	Please give details:
	There is a HR and Accounting Responsible in the company.
Is there a policy to ensure all worker information is confidential?	🗹 Yes 🗆 No
	Please give details:
	The facility has an effective key control procedure to keep the information confidential.
Is there an effective procedure to ensure confidential information is kept	🗹 Yes 🗆 No
confidential?	Please give details:
	There is an effective procedure to ensure confidential information is kept confidential.
Are risk assessments conducted to evaluate policy and procedure	☑ Yes 🗆 No
effectiveness?	Please give details:
	Facility conducted risk assessment evaluates effectiveness of every policy and procedure department wise.
Does the facility have a process to address issues found when conducting	🗹 Yes 🗆 No
risk assessments, including implementation of controls to reduce	Please give details:
identified risks?	The facility has an internal system to raise the issue found the risk assessment and to implement the way of reduction it.

Report reference: Start Date: ZAA600056731 2024-04-08

End Date: 2024-04-08





Does the facility have a policy/code which require labour standards of its own suppliers?	<ul><li>☑ Yes □ No</li><li>Please give details:</li></ul>
	The facility have a policy or code which requires labour standards of its own suppliers.
	Land Rights
Does the site have all required land rights licenses and permissions (see	🗹 Yes 🗆 No
SMETA Measurement Criteria)?	Please give details:
	The facility has Building Registration Certificate and Licenses.
Does the site have systems in place to conduct legal due diligence to recognize	🗹 Yes 🗆 No
and apply national laws and practices relating to land title?	Please give details:
	The facility has system for checking the legal documents.
Does the site have a written policy and procedures specific to land rights?	🗆 Yes 🗵 No
	Please give details:
	Not applicable, no special written policy and procedure for land rights was applied.
Is there evidence that facility/site compensated the owner/lessor for the	🗹 Yes 🗆 No
land prior to the facility being built or expanded?	Please give details:
expanded?	The facility has land deed, and rental contract.
Does the facility demonstrate that alternatives to a specific land acquisition	🗆 Yes 🗵 No
were considered to avoid or minimize adverse impacts?	Please give details:
	No land acquisition exist on the land.
Is there any evidence of illegal appropriation of land for facility building	🗆 Yes 🗵 No
or expansion of footprint?	Please give details:
	There was no illegal appropriation of land. It was noted through land ownership agreement review and management interview that the facility does not go through illegal appropriation of land for facility building.





#### 1 - Freely chosen Employment [Summary of Findings]

1: Compliance Requirements

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

#### **Current Systems and Evidence Examined**

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

#### **Current Systems:**

 The facility has a policy which prohibits forced labour and this was also available for review. •Age verification documents (National ID card copy, educational certificate, nationality certificates) were available in employee personal files.

•Service book is provided to every employee.

•Overtime is voluntary. •The terms and conditions of employment state that the workers are free to leave the workplace outside of their working hours. Facility also has a written policy regarding this.

•The facility did not require any payment for work tools, PPE, IC/staff card, training, etc.

•The facility does not use any prison labour.

•The above was confirmed in management and employees' interviews.

**Evidence examined:** 

1. Personnel files

2. The facility policy, rules and regulations, and training records etc.

3. Resignation records

4. Factory rules

5. Employee handbook

6. Management and worker interview

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)	□ Yes ☑ No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	□ Yes  ☑ No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	□ Yes ☑ No Please give details:
Are there any restrictions on workers' freedom to terminate employment?	<ul> <li>Yes INO</li> <li>Please give details:</li> <li>Facility has a policy mentioning workers are free to terminate employment from the facility.</li> </ul>





If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day	🗆 Yes 🗆 No 🗹 Not Applicable
	Please give details:
slavery statement?	The facility did not have any business part with UK which across £36m turnover annually.
Is there evidence of any restrictions on workers' freedoms to leave the site at the	🗆 Yes 🖂 No
end of the work day?	Please give details:
	No evidence of any restrictions on workers freedoms to leave the site at the end of the workday.
Does the site understand the risks of forced / trafficked / bonded labour in its	🗹 Yes 🗆 No 🗆 Not Applicable
supply chain	Please give details:
	The facility established a policy about forbidden of forced / trafficked / bonded labour and implemented strict management system to control the risk of forced / trafficked / bonded labour in its supply chain. The facility sent agreement of commitment to its suppliers, and operated social responsibility audit on suppliers to control the risk of forced / trafficked / bonded labour in its supply chain.
Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	🗹 Yes 🗆 No
	Please give details:
	Factory had provided training and awareness session to all employees to reduce the risk of forced / trafficked labor. A special Forced Labour Policy in use for the purpose.

End Date: 2024-04-08





#### 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 activity on site. The union is not mandatory in Turkish Legal System. There is open door policy in facility that employees can complain directly to the top management. Wish and complaint boxes are available. However, according to the worker interviews, in case an employee has a concern or a problem, majority of them tend to explain it to their section chief or to the worker representative. Worker representatives are obliged to notify the employer of any problems related to the work and working environment of the workers. It has been observed that this legal duty has been announced to all employees.

#### **Evidence examined:**

1. Freedom of Association Procedure

2. Facility management interviews

Worker interview

4. Complain box register (Suggestions from the complaint box and actions taken)

5. Meeting records review, Grievance handling policy & procedure.

#### 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)	□     Union     ☑     Worker Committee       □     Other     □     None
Other details:	There were worker representatives. The freely chosen worker representatives (1 female, 1 male) are in charge for the purpose. The Procedure, election records (06.01.2022) seen/checked. The union is not mandatory in Turkish Legal System.
Is it a legal requirement to have a union?	🗆 Yes 🗵 No
Is it a legal requirement to have a worker's committee?	🗆 Yes 🗵 No
Is there any other form of effective worker/management communication channel? (Other than union/worker	<ul> <li>✓ Yes □ No</li> <li>Please give details:</li> </ul>
committee e.g. H&S, sexual harassment)	Open door policy, wish and complaint boxes, worker representation.
Is there evidence of free elections?	🗹 Yes 🗆 No

Audit company: GSCS International Ltd Report reference: ZAA600056731 Start Date: 1 2024-04-08

End Date: 2024-04-08





Does the supplier provide adequate facilities to allow the Union or committee	🗹 Yes 🗆 No
to conduct related business?	Please give details:
	Worker representatives can conduct their responsibilities.
Name of union and union representative, if applicable:	N/A. No union in the factory.
Is there evidence of free elections?	🗆 Yes 🗆 No 🖂 Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	No union on-site. The factory had a worker representative, and heath and safety committee.
Is there evidence of free elections?	🗹 Yes 🗆 No 🗆 Not Applicable
Are all workers aware of who their representatives are?	🗹 Yes 🗆 No
	Please give details:
	All workers are well aware of their representatives and their activities.
Were worker representatives freely elected?	🗹 Yes 🗆 No
Date of last election:	2022-06-01
Do workers know what topics can be raised with their representatives?	🗹 Yes 🗆 No
Were worker representatives/union representatives interviewed?	🗹 Yes 🗆 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.	The election process and procedure of worker representatives were reviewed. Worker interviews have also confirmed that workers are aware of their representatives. The last meeting was in 17.01.2024. The meeting minutes were communicated through notice board. The meeting's topic was; brief information about Occupational Health and Safety Requirements, duties and responsibilities of the worker's representative, duties of the worker's representative in internal audits.
Are any workers covered by Collective Bargaining Agreement (CBA)?	🗆 Yes 🗵 No

Start Date:End2024-04-08202



#### 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:**

1. Company has agreement with outsourced H&S expert for taking care of H&S topics and issues. Legal Safety officer Ziya Polat is responsible for trainings too.

2. Contracted Doctor name is Dr. Naci Onan

3. Emergency exit doors opening outwards of three different directions of the building. Evacuation routes are clear and free from obstruction. Markings lead correct way to emergency exit doors. There were no blocked fire exit doors.

4. Tested emergency lightings were functional.

5. MSDS forms of chemical sprays available for review. They are in Turkish language and displayed on the wall. H&S instructions, Covid-19 precaution boards and social compliance policies displayed as observed during the tour.

6. Fire alarms were tested and worked well. There are fire extinguishers and fire hose cabinet were placed at common areas. Emergency lights were placed at emergency routes and stairs. Company has total 62 fire extinguishers at site. 9 CO2 and 53 ABC and F are other type of fire

extinguishers are available.

7. Protective shoes were used in yarn warehouse by workers where trolleys and trans pallets are used.

8. Toilet facilities, canteen was provided and clean. Lunch is provided by a catering firm.

9. Facility didn't provide dormitory facilities to any employee's.

10. Electrical, Machine & fire safety

•All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards.

•Facility checks all electric channels, distribution board and electric connection daily and monthly schedule wise.

Facility maintains a scheduled maintenance plan for doing maintenance of all machines.

11. Medical services

•There were 21 first aid boxes with sufficient kits in the full facility.

•Facility has appointed 01 doctor who is available in working time of the facility. They also arranged monthly first aid training with first aiders.

Building safety

•The factory operates on one floor building. The facility has legal document as Building Usage Permit and Fire License.

#### **Evidence examined:**



- Fire drill records- 05.08.2023
- Fire training of emergency teams-05.08.2023
  Health and safety training -29.07.2023
  Covid 19 pandemic training-14.04.2022

- Emergency training-13.07.2023
  Hygiene and Covid 19 training records-13.07.2022
- Emergency preparation training records-13.07.2022
  Emergency preparation training records-13.07.2023
  Cleaning and Hygiene chemicals and usage training records-29.06.2023
  Air compressor checked 15.08.2023
  Grounding safety check 15.08.2023
  Electrical safety report 15.08.2023
  Use further representative election 06.07.2022

- H&S worker representative election 06.07.2023
- H&S worker representative trainings 06.07.2023
- Orientation training 28.05.2023

#### 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?	<ul><li>☑ Yes □ No</li><li>Please give details:</li></ul>
are these communicated to workers?	Factory had adopted health & safety policy which covers PPE(s), machine safety device, fire safety (fire extinguisher, freighting equipment, hose pipe etc.), emergency pathway, evacuation drill, housekeeping, first aid, electrical safety etc.
Are the policies included in workers' manuals?	🗆 Yes 🗵 No
	Please give details:
	They are communicated through notification board and included in training materials.
Are there any structural additions without required permits/inspections	🗆 Yes 🗹 No
(e.g. floors added)?	Please give details:
	There were no structural additions without prior permits/ inspections.
Are visitors to the site informed on H&S and provided with personal protective	🗹 Yes 🗆 No
equipment?	Please give details:
	Visitors were informed about OHS.
Is a medical room or medical facility provided for workers?(This section is to	🗹 Yes 🗆 No
list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))	Please give details:
	During the on-site inspection, there was a doctor's room in the facility. Medical room, a room where they can provide patient privacy and hygiene has been arranged. The doctor uses this room when he comes. There were also first aid cabinets with appropriate material content in the facility. They were placed at points accessible to employees.
Is there a doctor or nurse on site or there is easy access to first aider/ trained	🗹 Yes 🗆 No
medical aid?	Please give details:
	Contracted workplace doctor is available, he comes once a week, and 25 employees have received first aid training and certificate.

**Report reference:** ZAA600056731

Start Date: 2024-04-08

End Date: 2024-04-08





Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	<ul> <li>✓ Yes □ No</li> <li>Please give details:</li> <li>During angite audit intension with management workers</li> </ul>
	During onsite audit, interview with management, workers, worker representative facility provides transportation which is fit for purpose, safe, maintained and operated by competent persons.
Is secure personal storage space provided for workers in their living space	🗹 Yes 🗆 No
and is fit for purpose?	Please give details:
	No dormitory or living space was provided to the worker; however, the facility does have secure personal storage space provided for workers.
Are H&S Risk assessments are conducted (including evaluating the arrangements	🗹 Yes 🗆 No
for workers doing overtime e.g. driving	Please give details:
after a long shift) and are there controls to reduce identified risk?	Risk assessments are conducted. On 08.11.2023.
Is the site meeting its legal obligations on environmental requirements	☑ Yes □ No
including required permits for use and disposal of natural resources?	Please give details:
	The facility has a special license indicating that the Facility has Environmental Effect Assesment Letter.
Is the site meeting its customer requirements on environmental	🗹 Yes 🗆 No
standards, including the use of banned chemicals?	Please give details:
	Factory did not use banned chemicals and follows the entire customer requirement on environmental standard.

End Date: 2024-04-08





#### 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:**

•The facility has established a practice that they will never employ and use any child labor. •The facility verifies all workers' original national ID card, birth certificate etc. at the time of recruitment and keeps the photocopies of workers' ID cards, birth certificate in their personal files. •Factory verifies the workers age through registered doctor.

•Sampling basis employees' personal files was taken for review. Each employee file included a bio-data sheet, recent photo, birth registration certificate / photo copied national identification card and other documents.

•There was no child or young employee observed in the facility.

•It was evident during the documents review, the age of youngest worker is 19 years old. During the facility walk-through, there were no concerns regarding child labor observed.

#### Evidence examined:

1.The procedure of <Recruiting regulation> was available for review, the personnel files with ID or birth certificate copy were available for review, the contracts with all the employees were available for audit, and the roster had established by the factory.

2. Document review

Management interview

4. Worker interview

5. On-site observation during floor visit

#### Any other comments:

None.

Legal age of employment:	16
Age of youngest worker found:	19
Are there children present on the work floor but not working at the time of audit?	□ Yes 🗹 No
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	<ul> <li>□ Yes ☑ No</li> <li>Please give details:</li> <li>There is no young worker.</li> </ul>





#### 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:**

•Based on the legal requirements, the actual lowest minimum wage in the facility is 17002 TL/net per month

•Time keeping system is fingerprint and face reader system together to all workers.

•All workers 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.

•All social insurance payments were passed on to the relevant authorities in a timely manner.

•Each employee was given a pay slip and signed for their wages. •All employees were paid within 10 working days of the following month. •Employees are aware of their minimum wage.

•Wages have been recorded according to documents checked. There is one recording for payments. Employee salaries are completely registered to Social Security Foundation (SGK). All wages are paid via bank.

 According to the documents which were provided and during the worker's interview, it was noted that factory provides all kinds of leave. Maternity leave and earn leave benefits are provided to the employees as per law.

#### **Evidence examined:**

- 1. Worker interview
- 2. Management interview
- 3. Local and national laws
- 4. Wages and benefits policy
- 5. Local legal minimum wage documents

6. Payroll records of 3 months February 2024 (last month), August 2023 (peak month), and March 2023 ( non-peak month)

7. Leave records

8. Social group insurance and payment receipts from the local labour department

- 9. Labour contracts for all employees
- 10. Resignation records
- 11. Payslips of all workers
- 12. Overtime records

#### Any other comments:

#### None.

	Summary I	nformation		
Criteria	Local Law	A	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Audit company:	Report reference:	Start Date:	: End Date:	Sedexglobal.com 2



Standard/Contracted work hours	Logal Maximum	Actual	NO
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 11.0 Per Week: 45.0 Per Month: null	Actual Per Day: 9.0 Per Week: 45.0 Per Month: 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: 7.0 Per Month: 21.0	NO
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: 17002	Actual Per Day: 0 Per Week: 0 Per Month: 17002	NO
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: null	Actual Per Day: 0 Per Week: 0 Per Month: 0	NO
	Wages Analysis:		
Were accurate records shown at the first request?	🗹 Yes 🗆 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)	26 sample for March 2023 (Off-peak Month) 26 sample for August 2023 (Peak Month) 26 sample for February 2024 (Recent Month)		
Are there different legal minimum wage grades? If Yes, please specify all.	🗆 Yes 🗵 No		
If there are different legal minimum grades, are all workers graded and paid correctly?	□ Yes □ No ☑ 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?	<ul> <li>□ Below legal min</li> <li>☑ Meet</li> <li>☑ Above</li> </ul>		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	17002 TL		
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 15.0% of workforce earning minimum wage 85.0% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	Bonus Scheme found:No bonus scheme payment in the facility. 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 Security Premium, Unemployment Fund, Stamp Tax, Income Tax.		
Have these deductions been made?	🗹 Yes 🗆 No		
Please list all deductions that have been made.	<ol> <li>Social Security Premium</li> <li>Unemployment Fund</li> <li>Stamp Tax</li> <li>Income Tax</li> </ol>		

te: End Date: -08 2024-04-08

Sedexglobal.com 30



Please list all deductions that have not been made.	None.	
Were appropriate records available to verify hours of work and wages?	🗹 Yes 🗆 No	
Were any inconsistencies found? (if yes describe nature)	□ Yes ☑ No	
Do records reflect all time worked? (For instance, are workers asked to attend	✓ Yes □ No	
meetings before or after work but not paid for their time)	Please give details: Records provided by the factory reflect all the time worked.	
Is there a defined living wage:	□ Yes ☑ No	
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.	Please give details:	
If yes, what was the calculation method	ISEAL/Anker Benchmarks Asia Floor Wage	
used.	<ul> <li>Figures provided by</li> <li>Living Wage Foundation</li> <li>Unions</li> <li>UK</li> </ul>	
	🗆 Fair Wear Wage Ladder 🛛 🗆 Fairtrade Foundation	
	Other – please give details:	
Are there periodic reviews of wages? If Yes give details (include whether there is	☑ Yes □ No	
consideration to basic needs of workers plus discretionary income).	Please give details:	
	Minimum wages are updated regularly by the Ministry of Labour and Social Security. There is no need for the facility to review wages.	
Are workers paid in a timely manner in line with local law?	🗹 Yes 🗆 No	
Is there evidence that equal rates are being paid for equal work:	🗹 Yes 🗆 No	
	Please give details:	
	Based on employee's interview and wage records, it was noted that equal rates are paid for equal work. A copy of appointment letter is issued to the employees.	
How are workers paid:	🗆 Cash 🛛 Cheque	
	🗵 Bank Transfer 🛛 🗆 Other	





	Good Example	Evidence
[Back to findings summary]		
	Good Example	
Status	OPEN	
Reference	ZAF600477937	
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?	☑ New □ Carried Over	
Explanation to the good example	It was noted that facility provides lunch and transportation free of charge	
Evidence	During the managment review, worker review and documents 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:**

- 1. Regular working hours (weekly) is 45 hours, and facility complies with the law.
- 2. Overtime work is voluntary, and this was confirmed during interviews.
- 3. Overtimes are compensated in a premium rate (150% of hourly rate for all workers working OT). 4. The facility using Fingerprint and face reader system together to all workers for time recording.
- 5. The facility provides break time to the workers.

6. From amon'g 10 sampled employees, in February 2024, August 2023, March 2023.

•Not Exceeding 11 hours per day (regular work plus overtime work), •Not Exceeding 45 hours per week (regular work),

- •Not Exceeding 60 hours per week (regular work overtime),
- Not exceeding 270 hours per year (overtime work)

There is only 02 shift in the facility which that resembles as follows: 08:00 to 18:00 (From Monday to Friday-5 days). Breaks: 10:00-10:15, 12:15-12:45, 16:00-16:15.

There are 2 short breaks and 1 meal break in the company.

Evidence examined:

- 1. Employee interview
- 2. Management interview
- Local and national laws
- 4. Factory policy on working hours
- 5. Attendance and wages records of 3 months sampled: February 2024 (Recent Month), August 2023 (Peak month) and March 2023 (off-peak).
- 6. Time keeping system is Fingerprint and face reader system together to all workers.
- Sample pay slips with recorded hours all workers interviewed.
- Quality and production records to cross check hours.
- 9. Workers contracts

#### Any other comments:

None.

	Working hours' analysis
Systems & Processes	
What timekeeping systems are used?	Fingerprint and face reader system together to all workers.

Audit company:	Report reference:
GSCS International Ltd	ZAA600056731





Is sample size same as in wages section?	🗹 Yes 🗆 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.)	☑ Yes 🗆 No
Are there any other types of contracts/employment agreements used?	□ Yes 🗹 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.)	□ Yes 🗹 No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day- period?	☑ 1 in 7 days
Is this allowed by local law?	🗹 Yes 🗆 No
Maximum number of days worked without a day off (in sample):	6
Stand	ard/Contracted Hours worked
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<ul> <li>□ Yes ☑ No</li> <li>% of workers:</li> <li>null%</li> <li>Frequency:</li> </ul>
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	🗆 Yes 🗵 No
	Overtime Hours worked
Actual overtime hours worked in sample (State per day/week/month)	As a result of interviews with employees, document review and management statement, it was determined that the standard + overtime working hours of some employees did not exceed the daily limit of 11 hours. The sampled months are February 2024, August 2023, March 2023. Maximum overtime hours were (February 2024 2 hours per day, 7 hours per week and 21 hours per month) (August 2023 2 hours per day, 7 hours per week and 21 hours per month) (March 2023 1 hour per day, 5 hours per week and 12 hours per month).
Combined hours (standard or contracted + overtime hours = total) over 60 found?	<ul> <li>❑ Yes ☑ No</li> <li>Please give details:</li> <li>Not Exceeding 60 hours was detected in the sampled months. The maximum weekly working time, including overtime work, was 55 hours.</li> </ul>
Approximate percentage of total workers on highest overtime hours:	28.0%

Audit company: GSCS International Ltd Report reference: ZAA600056731 
 Start Date:
 Er

 2024-04-08
 20

End Date: 3 2024-04-08





Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	☑ Yes □ No □ Conflicting Information		
	Please give details:		
	According to workers' interview, all overtime works are voluntary.		
	Overtime premium		
Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	✓ Yes □ No □ N/A – there is no legal requirement to OT premium		
wages,	Please give details:		
	Overtime premium for weekdays and weekly day off: 150%, overtime premium for official holidays: 200%.		
Is overtime paid at a premium?	🗹 Yes 🗆 No		
	Overtime premium for weekdays and weekly day off: 150%, overtime premium for official holidays: 200%		
If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations?	<ul> <li>✓ No</li> <li>☐ Consolidated pay</li> <li>☐ Collective Bargaining agreements</li> </ul>		
Please complete the boxes where relevant.	Other		
Please give details	Overtime premium for weekdays and weekly day off: 150%, overtime premium for official holidays: 200%		
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	<ul> <li>✓ Overtime is voluntary</li> <li>☐ Onsite Collective ☐ Safeguards are bargaining allows in place to 60+ hours/week protect worker's is voluntary</li> </ul>		
any checked boxes above e.g. detail of consolidated pay / CBA or Other)	□ Site can □ Other reasons demonstrate (please specify) exceptional circumstances		
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	Not Exceeding 60 hours was detected in the sampled months. The maximum weekly working time, including overtime work, was 52 hours.		
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	□ Yes 🗵 No		
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	□ Yes ☑ No		

 Start Date:
 End

 2024-04-08
 2024



#### 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:**

1. Written procedure is available.

2. 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. No evidence about discrimination.

3. The factory paid an equal wage for equal tasks.

4. Gender discrimination was also absent in the facility; both female and male workers were distributed in all types of work.

5. There was no restriction for formation of trade union in the factory.

#### **Evidence examined:**

Worker interviews, wage, and time record review.

#### Any other comments:

None.

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 68.09	6	Female: 32.0%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	0		
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?	🗆 Hiring	□ Compensation	Access to training
	Promotion	Termination or retirement	No evidence of discrimination found
Please give details	The facility has a social compliancy policy which states that no discrimination is allowed for all the process.		
Professional Development			
What type of training and development are available for workers?	It is supported to obtain the professional qualification certificates that will be required due to the task carried out in the facility.		
Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	☑ Yes 🗆 No		

Start Date:End Date:2024-04-082024-04-08

Sedexglobal.com



#### 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:**

1. There was no sub-contracting in the facility.

2. There was no migrants in the factory.

3.All workers are registered to the social security system.

4.The factory has no debt to the social security system. 5.Employees' labour contracts were available in their personal

files.

6.Labour contracts were in accordance with the laws and regulations.

7.A copy of the employment contract was given to employees.

Evidence examined:

Document review (Employees' labour contracts, time records, payment records) and workers interviews.

Any other comments:

None.

Responsible Recruitment				
All Workers				
Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	<ul> <li>☑ Terms &amp; Conditions presented</li> <li>☑ Understood by workers</li> <li>☑ Same as actual conditions</li> </ul>			
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			
Migrant Workers				

Report reference: ZAA600056731

Start Date: End Date: 2024-04-08 2024-04-08





Type of work undertaken by migrant workers:	There was no migrants in the factory.			
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?	🗆 Yes 🗹 No			
	Please give details:			
	N/A. There was no migrants in the factory.			
Is there any observation on this finding?	N/A. There was no migrants in the factory.			
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	□ Yes ☑ No			
	Non-employee workers			
Recruitment Fees				
Are there any fees?	🗆 Yes 🗵 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	Not applicable, no agency used.			
Were agency workers' age / pay / hours included within the scope of this audit?	🗆 Yes 🗹 No			
Were sufficient documents for agency workers available for review?	🗆 Yes 🗹 No			
Is there a legal contract agreement with all agencies?	🗆 Yes 🖂 No			
	Please give details:			
	Not applicable, no agency used.			
Does the site have a system for checking	🗆 Yes 🗹 No			
labour standards of agencies?	Please give details:			
	Not applicable.			
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?	🗆 Yes 🗹 No			
	Please give details:			
	Not applicable, no contractors used			
Do all contractor workers understand their terms of employment?	🗆 Yes 🗹 No			
and terms of employment:	Please give details:			
	Not applicable, no contractors used			





Audit company: GSCS International Ltd Report reference:Start Date:ZAA6000567312024-04-08

vate:End Date:4-082024-04-08





Non-Compliance		Evidence		
[Back to findings summary]				
	Non-Co	ompliance		1
Status	CLOSED			
Reference	ZAF600407293			-
Clause	8 - Regular Emp	loyment Is Provi	ded	-
Issue Title	530 - Contractual terms are not communicated in a language the worker can understand			
Subcategory	Terms of Employ	yment/Engagem	ent	
New or carried over?	🗆 New		arried Over	]
Raised by audit	ZAA420650648			
Resolved by audit	ZAA600056731			_
Root cause	🗆 Training	🗆 Sy	/stem	
	🗆 Costs	🗆 La	ack of workers	
	🗹 Other			
Root cause - Other	N/A			
ETI code	8.1 - To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.			
Explanation to the non compliance	This NC is closed	Ł		-
Follow up method	🗵 Follow up au	dit 🗆 D	esktop audit	-
Timescale	🗆 Immediate	🗹 30 days	🗆 60 days	
	□ 90 days	🗆 120 days	🗆 180 days	
	🗆 365 days	🗆 Other		
Actions	N/A			
Additional comments	Raporda belirtilen sözleşme hususuna ilişkin şirketimizde çalışan (16 kişi) yabancı personelin tamamına anadillerinde sözleşme tanzim edilip imzalanmış ve bir personele ait sözleşme örneği sisteme eklenmiştir. The Follow-up issue will be closed by a follow-up audit. The facility has contract in Arabic Language. This NC is closed			



Audit company: GSCS International Ltd Report reference:Start Date:ZAA6000567312024-04-08

ate:End Date:1-082024-04-08





### 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:

No homeworking at the facility.
 There was no sub-contracting in the factory.

# Evidence examined:

- 1. Factory tour
- Management interview
   Workers interview
- Any other comments:

None.

Summary of sub-contracting - if applicable			
Is there any sub-contracting at this site?	🗆 Yes 🖾 No		
Summary of homeworking – if applicable			
Is homeworking used at this site?	🗆 Yes 🖂 No		



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

9: Compliance Requirements

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

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

#### **Current Systems and Evidence Examined**

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

#### **Current Systems:**

- All workers in the factory have the legal right to work.
   There is no violation noted also based on document review and worker interviews.
- 3. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation were prohibited in this factory.
- 4. Disciplinary process is complying with the law.
- 5. All workers are aware of disciplinary process.

#### **Evidence examined:**

1. Document review(policies and written procedures of discipline, grievance mechanism)

- Management interview
- 3. Worker interviews

#### Any other comments:

None.

Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?	🗹 Yes 🗆 No
	Please give details:
	The workers call Ministry of Labour hotline for any violations and grievances.
If yes, are workers aware of these channels and have access? Please give details.	Workers have stated that they are aware of this channel during workers' interviews.
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism,comment box etc. Please give details.	Workers have stated that they are aware of this channel during workers' interviews. There was comment box and open door policy.
Which of the following groups is there a grievance mechanism in place for?	☑ Worker □ Communities
	□ Suppliers □ Other
Please provide grievance mechanism details	Hot line, complaint box system was in place for workers to report their grievances with full.
Are there any open disputes?	🗆 Yes 🗵 No
	Please give details:
Does the site encourage its business	🗹 Yes 🗆 No
partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	Please give details:
	1

Start Date: 2024-04-08

2024-04-08

End Date:





Is there a published and transparent disciplinary procedure?	<ul><li>✓ Yes □ No</li><li>Please give details:</li></ul>
If yes, are workers aware of these the disciplinary procedure?	<ul><li>✓ Yes □ No</li><li>Please give details:</li></ul>
Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	□ Yes ☑ No Please give details:

te:End Date:082024-04-08





#### 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:**

All workers have their own legal right to work.
 Workers confirm that no migrant workers.

#### **Evidence examined:**

1. Document review( employee agreements, migrant workers procedure, employee rights procedure, employee recruitment policy, universal rights policy and procedure)

Management
 Worker interviews

# Any other comments:

None.



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

10B2: Compliance Requirements

10.B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits. 10.B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.

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

#### **Current Systems and Evidence Examined**

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

#### **Current Systems:**

- 1. EIA opinion letter is available.
- There is no Environmental Permit. 2
- 3. The facility is working with authorized recycling handling companies.
- 4. The facility gives its hazardous wastes to licensed companies.

#### **Evidence examined:**

Document Review (environmental policy, waste management procedure, environmental complaint procedure, internal audit procedure, emergency procedure, energy usage procedure, environmental aspects procedure ), site tour, management interview.

#### Any other comments:

None.





# Attachments



Report reference: ZAA600056731

Start Date: 2024-04-08

End Date: 2024-04-08







Report reference: ZAA600056731 Start Date:E2024-04-082







GSCSF75-Photoframe for Social.pdf



Asır Group - CAPR.Signed.pdf

Report reference:Start Date:ZAA6000567312024-04-08

te: End Date: -08 2024-04-08







For more information visit: <u>Sedexglobal.com</u>

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

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

Click here for Buyer (A) & Buyer/Supplier (A/B) members:

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5Iw\_3d\_3d

Click here for Supplier (B) members:

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY\_2brg\_3d\_3d

Click here for Auditors:

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

Audit company: GSCS International Ltd Report reference:Start Date:End Date:ZAA6000567312024-04-082024-04-08

