



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: (only available on Sedex System)	ZC: The facility is not registered in the Sedex system yet	Sedex Site Reference: (only available on Sedex System)	ZS: The facility is not registered in the Sedex system yet
Business name (Company name):	ANKATEKS MODA GIYIM SANAYI VE DIS TICARET LTD.STI.		
Site name:	ANKATEKS MODA GIYIM SANAYI VE DIS TICARET LTD.STI.		
Site address: (Please include full address)	KEMALPASA MAH. 1929. SOK. 2/41 BAGCILAR - ISTANBUL	Country:	TURKEY
Site contact and job title:	A.KEREM AYDIN –HUMAN RESOURCES & SOCIAL COMPLIANCE RESPONSIBLE.		
Site phone:	+90 212 430 24 82	Site e-mail:	aydinkeremm@gmail.com
SMETA Audit Pillars:	☒ Labour Standards	☒ Health & Safety (plus Environment 2-Pillar)	☐ Environment 4-pillar ☐ Business Ethics
Date of Audit:	20.01.2020		

Audit Company Name & Logo: 	Report Owner (payer): ANKATEKS MODA GIYIM SANAYI VE DIS TICARET LTD.STI.
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Audit Conducted By					
Affiliate Audit Company	☒	Purchaser	☐	Retailer	☐
Brand owner	☐	NGO	☐	Trade Union	☐
Multi-stakeholder	☐	Combined Audit (select all that apply)			

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

Any exceptions to this must be recorded here (e.g. different sample size): There are totally 9 employees in the facility, and 2 of them are in production. Therefore, the interviews are done with these 2 production employees.

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

Lead auditor: GIZEM OZTURK-Auditor APSCA number: 21700502

Lead auditor APSCA status: ASCA

Team auditor: NONE

Interviewers: GIZEM OZTURK

Report writer: GIZEM OZTURK

Report reviewer: RAMA RAO (REVIEWER0

Date of declaration: 20.01.2020

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

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

Summary of Findings

Issue (please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.	Area of Non-Conformity (Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)				Record the number of issues by line*:			Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A Universal Rights covering UNGP			☐	☐		0	0	None
0B Management systems and code implementation		☒	☒	☐	1	0	0	NC 1: It was noted that business opening and operation permit of the facility was not observed.
1. Freely chosen Employment	☐	☐		☐	0	0	0	None
2. Freedom of Association	☐	☐		☐	0	0	0	None
3. Safety and Hygienic Conditions	☐	☐		☐	0	0	0	None
4. Child Labour	☐	☐		☐	0	0	0	None
5. Living Wages and Benefits	☒	☒		☐	1	0	1	NC 2: The minimum wages of the employees' are paid through bank via official payrolls that submitted to social insurance agency. The rest of the wages and overtime wages are paid by cash. Management provided all records to the auditors during audit day. The payments are done correctly and on-time in the facility. GE 1: Meal is provided free of charge to all employees at the facility.

6	<u>Working Hours</u>	☐	☐		☐	0	0	0	None
7	<u>Discrimination</u>	☐	☐		☐	0	0	0	None
8	<u>Regular Employment</u>	☐	☐	☐	☐	0	0	0	None
8A	<u>Sub-Contracting and Homeworking</u>		☐	☐	☐	0	0	0	None
9	<u>Harsh or Inhumane Treatment</u>	☐	☐	☐	☐	0	0	0	None
10A	<u>Entitlement to Work</u>		☐	☐	☐	0	0	0	None
10B2	<u>Environment 2-Pillar</u>		☐	☐	☐	0	0	0	None

General observations and summary of the site:

ANKATEKS MODA GIYIM SANAYI VE DIS TICARET LTD.STI. was established in Istanbul in 2016, by changing the legal entity from an individual company, performing the cutting (for itself and for the sub-contractors) and sample production of knitted out wear garments. The facility has operated in to this location from the beginning.

The youngest worker on site was 26 years old.

There are 9 permanent workers on site.

Administrative: 7 employees (1 female, 5 male)

Lunch hall: 1 female employee

Production: 2 employees (all male)

Working hours of the facility was as follows:

From 08:30 to 19:00 with 60' lunch break and 15'x2 tea breaks X 5 days

Payment day: On 5th day of each month.

Payment period: Monthly

Time recording system: Finger scanning time recording system

There are totally 9 employees in the facility, and 2 of them are in production. Therefore , the interviews are done with these 2 production employees (all male) individually.

2 employees' wage and attendance records were reviewed for December 2019 (last paid month), September 2019 (nonpeak month) and March 2019 (non-peak month).

All workers said that they were happy about working environment, payment on time and management attitude.
At least legal minimum wage was paid to all workers. {2.029,50 TL/month (Gross), 1603,12 TL/month (Net including minimum subsistence allowance) Since 1st January 2018----2558,40 TL / month (Gross), 2020,90 TL / month (Net including minimum subsistence allowance) since 1th January 2019}

There is 1 worker representative at the facility.

There is no union at this facility.

of young employee: 0

of pregnant employee: 0

of disabled employee: 0

maternity leave: 0

migrant employee: 0

daily employee: 0

intern: 0

iskur: 0

Audit Process

At 09:30 am on 20TH January 2019, GIZEM OZTURK / LEAD AUDITOR entered the facility then held an opening meeting according to the ETI Base Code; the facility management was present in the meeting. Opening and closing meeting was held with A. KEREM AYDIN / HUMAN RESOURCES & SOCIAL COMPLIANCE RESPONSIBLE. In view of the findings raised, below non-compliances were found. For other areas, no non-compliance was noted.

Issues found NC's

0B.MANAGEMENT SYSTEMS AND CODE IMPLEMENTATION

NC1: It was noted that opening and operation permit of the facility was not observed.

WAGES AND BENEFITS

NC2: The minimum wages of the employees' are paid through bank via official payrolls that submitted to social insurance agency. The rest of the wages and overtime wages are paid by cash. Management provided all records to the auditors during audit day. The payments are done correctly and on-time in the facility.

Observations

None

Good Examples

WAGES AND BENEFITS

GE1: Meal is provided free of charge to employees.

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

Site Details

Site Details																							
A: Company Name:	ANKATEKS MODA GIYIM SANAYI VE DIS TICARET LTD.STI.																						
B: Site name:	ANKATEKS MODA GIYIM SANAYI VE DIS TICARET LTD.STI.																						
C: GPS location: (If available)	GPS Address: KEMALPASA MAH. 1929. SOK. 2/41 BAGCILAR - ISTANBUL	Latitude: 41.008449, Longitude: 28.949342																					
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Opening and operating permit no and date: There is no opening and operating permit – Please refer to NC1																						
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	CUTTING AND SAMPLE PRODUCTION OF KNITTED OUT WEAR GARMENTS.																						
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	ANKATEKS MODA GIYIM SANAYI VE DIS TICARET LTD.STI.was established in 2016. The facility is located in Istanbul. The total area of the facility is 1100 sqm. The production capacity is 30,000 pcs / monthly. Main process performed in the facility is cutting, and sample production of knitted outwear garments. <table border="1"> <thead> <tr> <th>Production Building no</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Ground floor</td> <td>ANKATEKS (entrance) + Another firm</td> <td>NA</td> </tr> <tr> <td>Floor 1</td> <td>ANKATEKS (empty flat, unused area)</td> <td>NA</td> </tr> <tr> <td>Floor 2</td> <td>ANKATEKS (cutting area)</td> <td>NA</td> </tr> <tr> <td>Floor 3</td> <td>ANKATEKS (offices, lunch hall, sample production area)</td> <td>NA</td> </tr> <tr> <td>Floor 4</td> <td>ANKATEKS (offices, showroom)</td> <td>NA</td> </tr> <tr> <td>Is this a shared building?</td> <td>YES</td> <td>NA</td> </tr> </tbody> </table>		Production Building no	Description	Remark, if any	Ground floor	ANKATEKS (entrance) + Another firm	NA	Floor 1	ANKATEKS (empty flat, unused area)	NA	Floor 2	ANKATEKS (cutting area)	NA	Floor 3	ANKATEKS (offices, lunch hall, sample production area)	NA	Floor 4	ANKATEKS (offices, showroom)	NA	Is this a shared building?	YES	NA
Production Building no	Description	Remark, if any																					
Ground floor	ANKATEKS (entrance) + Another firm	NA																					
Floor 1	ANKATEKS (empty flat, unused area)	NA																					
Floor 2	ANKATEKS (cutting area)	NA																					
Floor 3	ANKATEKS (offices, lunch hall, sample production area)	NA																					
Floor 4	ANKATEKS (offices, showroom)	NA																					
Is this a shared building?	YES	NA																					

	For below, please add any extra rows if appropriate. F1: Visible structural integrity issues (large cracks) observed? ☐ Yes ☒ No F2: Please give details: F3: Does the site have a structural engineer evaluation? ☐ Yes ☒ No F4: Please give details: The facility does not have building usage permit.
G: Site function:	☐ Agent ☒ Factory Processing/Manufacturer ☐ Finished Product Supplier ☐ Grower ☐ Homeworker ☐ Labour Provider ☐ Pack House ☐ Primary Producer ☐ Service Provider ☐ Sub-Contractor
H: Month(s) of peak season: (if applicable)	January, February, March
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	The main product of the facility is knitted out wear garments. The main processes are cutting and sample production. There is no line in production. There are totally 6 sewing machines, 1 ironing machine, 2 cutting machine/motors, 1 forming machine, 1 compressor and 1 hoist.
J: What form of worker representation / union is there on site?	☐ Union (name) ☐ Worker Committee ☒ Other (specify) (suggestion box, open door policy and worker representative) ☐ None
K: Is there any night production work at the site?	☐ Yes ☒ No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	☐ Yes ☒ No L1: If yes, approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	☐ Yes ☒ No M1: If yes, approx. % of workers

N: Were all site-provided accommodation buildings included in this audit	☐ Yes ☐ No N1: If no, please give details NA
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Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 09:30 A2: Day 1 Time out: 17:00	A3: Day 2 Time in: NA A4: Day 2 Time out: NA	A5: Day 3 Time in: NA A6: Day 3 Time out: NA
B: Number of auditor days used:	1 AUDITOR X 1 DAY		
C: Audit type:	☐ Full Initial ☒ Periodic ☐ Full Follow-up ☐ Partial Follow-Up ☐ Partial Other If other, please define:		
D: Was the audit announced?	☒ Announced ☐ Semi – announced: Window detail : ☐ Unannounced		
E: Was the Sedex SAQ available for review?	☐ Yes ☒ No If No, The facility is not registered in the Sedex system yet.		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	☐ Yes NA ☐ No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	A. KEREM AYDIN – HUMAN RESOURCES & SOCIAL COMPLIANCE RESPONSIBLE		
H: Is further information available (If yes, please contact audit company for details)	☐ Yes ☒ No		
I: Previous audit date:	29.11.2018		
J: Previous audit type:	Full initial - Smeta 2 pillar audit		
K: Were any previous audits reviewed for this audit	☐ Yes ☒ No ☐ N/A		

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

A: Present at the opening meeting?	☒ Yes ☐ No	☐ Yes ☒ No	☐ Yes ☒ No
B: Present at the audit?	☒ Yes ☐ No	☒ Yes ☐ No	☐ Yes ☒ No
C: Present at the closing meeting?	☒ Yes ☐ No	☐ Yes ☒ No	☐ Yes ☒ No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	There is 1 worker representative in the facility and he was included in the employee interviews.		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	There is no union in the facility.		

Worker Analysis

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

Worker Analysis								
	Local			Migrant*				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	7	0	0	0	0	0	0	7
Worker numbers – female	2	0	0	0	0	0	0	2
Total	9	0	0	0	0	0	0	9
Number of Workers interviewed – male	2	0	0	0	0	0	0	2
Number of Workers interviewed – female	0	0	0	0	0	0	0	0
Total – interviewed sample size	2	0	0	0	0	0	0	2



A: Nationality of Management	TURKISH	
B: Please list the nationalities of all workers, with the three most common nationalities listed first. <i>Please add more nationalities as applicable to site. Add more rows if required.</i>	Nationalities: B1: Nationality 1: <u>TURKISH</u> B2: Nationality 2: _____ B3: Nationality 3: _____	Was the list completed during peak season? ☒ Yes ☐ No If no, please describe how this may vary during peak periods: NA
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1 <u>100</u> C1: approx % total workforce: Nationality 2 _____ C2: approx % total workforce: Nationality 3 _____	
D: Worker remuneration (management information)	D: _____% workers on piece rate D1: <u>100</u>% hourly paid workers D2: _____% salaried workers Payment cycle: D3: _____% daily paid D4: _____% weekly paid D5: <u>100</u>% monthly paid D6: _____% other D7: If other, please give details	



Worker Interview Summary		
A: Were workers aware of the audit?	☒ Yes ☐ No	
B: Were workers aware of the code?	☒ Yes ☐ No	
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	None	
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 2	D2: Female: 0
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	☒ Yes ☐ No If no, please give details	
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	☒ Yes ☐ No	
G: In general, what was the attitude of the workers towards their workplace?	☒ Favourable ☐ Non-favourable ☐ Indifferent	
H: What was the most common worker complaint?	None received	
I: What did the workers like the most about working at this site?	On time wages, order in work place, the attitude of management & staff, social rights provided	
J: Any additional comment(s) regarding interviews:	None	
K: Attitude of workers to hours worked:	They claim on the limits strictly followed by the management on overtime practices due to social compliance audits.	
L. Is there any worker survey information available?		
☐ Yes ☒ No L1: If yes, please give details: NA		

M: Attitude of workers:

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

They were natural during interviews. They like the work place. They are paid on time. The management is related to health and safety precautions.

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

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

They were pleased of the overall conditions. No negative response received.

O: Attitude of managers:

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

They were very cooperative and transparent all through the audit process.

Audit Results by Clause

0A: Universal Rights covering UNGP

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

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

Social compliance responsible is authorized as A.Kerem Aydin – SCA Responsible.

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

Management interview

Employee interviews

Details:

Social compliance policy and related procedures

Authorization letter of social compliance responsible

Supplier chain mapping

Supplier and Subcontractors choosing and evaluating procedure

Grievance Mechanism Feedbacks

Any other comments: NONE

A: Policy statement that expresses commitment to respect human rights?	☐ Yes ☒ No A1: Please give details: The facility does not have detailed social compliance policy that includes human rights.
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	☒ Yes ☐ No Name: A.Kerem Aydin Job title: SCA Responsible
C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	☒ Yes ☐ No C1: Please give details: The facility has suggestion boxes.
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	☒ Yes ☐ No D1: If no, please give details The facility has detailed privacy procedures for worker's information. Also, the feedbacks getting from suggestion boxes are evaluating by the management in a confidential way.
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	☒ Yes ☐ No E1: Please give details: The facility has detailed privacy procedures for worker's information.

Findings		
Finding: Observation ☐ Company NC ☐ Description of observation: Not observed Local law or ETI/Additional elements / customer specific requirement: None Comments: None	Objective evidence observed: NA	

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

Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 2018 __1__ %	A2: This year: 2019 __1__ %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	% 1	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: __1__ %	C2: This year __1__ %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	% 1	
E: Are accidents recorded?	☒ Yes ☐ No E1: Please describe: Records were seen.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: 2018 Number: 0	F2: This year: 2019 Number: 0
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	0	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 2018 0	H2: This year: 2019 0
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months __0__% workers	I2: 12 months __0__% workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months __0__% workers	J2: 12 months __0__% workers

0B: Management system and Code Implementation

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

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

Current Systems and Evidence Examined

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

Current systems:

The facility has disciplinary procedures and work rules all posted onsite.
 All social compliance issues are managed and monitored internally.
 The employees have information regarding social compliance, social and legal rights.
 The facility management has already posted ETI Base code on notice boards.
 The facility has its own documented social policy that covers all issues mentioned in ETI Base Code.
 Overall responsibility for meeting the standards is taken by A. Kerem Aydin- HUMAN RESOURCES & SOCIAL COMPLIANCE RESPONSIBLE
 The facility does not have construction permit and opening&operating permit. (Also fire inspection report is not available due to opening and operating permit.)

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

Details: - Management interview
 - Employees' interviews
 - Training records
 - Company policies

Any other comments: None

Management Systems:

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

☐ Yes

☒ No

A1: Please give details: NA

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

☒ Yes

☐ No

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

C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Policies exist for all areas (Forced labour, Health and Safety, Wages, Working Hours, and No harsh treatment, Environment, Business Ethics, Child Labour, Recruitment, Discrimination and Sub-contracting.), these are communicated to workers via poster and annual training. Through documents review and workers interview, policy on 'No harsh treatment and Environment' was fully in compliance with the code. Workers stated no forced labour, there were both female and male among management/supervisors.
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	☒ Yes ☐ No D1: Please give details: These policy and procedures are communicated to all the staff through posters and also communicated as part of orientation training.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	☒ Yes ☐ No E1: Please give details: Training records are available.
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). <i>Please detail (Number and date).</i>	☐ Yes ☒ No F1 Please give details: NA
G: Is there a Human Resources manager/department? If Yes, please detail.	☒ Yes ☐ No G1 Please give details: Personnel records are kept by HR Department.
H: Is there a senior person / manager responsible for implementation of the code	☒ Yes ☐ No H1 Please give details: A. Kerem Aydin- HUMAN RESOURCES & SOCIAL COMPLIANCE RESPONSIBLE
I: Is there a policy to ensure all worker information is confidential?	☒ Yes ☐ No I1 Please give details: All worker information is kept on their personnel files and the facility has a policy about this.
J: Is there an effective procedure to ensure confidential information is kept confidential?	☒ Yes ☐ No

	J1 Please give details: All worker information is kept on their personnel files.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	☒ Yes ☐ No K1 Details: Health and Safety Risk assessment includes policy and procedures effectiveness.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	☒ Yes ☐ No L1 Details: The facility has a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risk
M: Does the facility have a policy/code which require labour standards of its own suppliers?	☐ Yes ☒ No M1 Details: The facility has not choosing and evaluating procedure for its suppliers.
Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	☐ Yes ☒ No N1 Details: The facility does not have construction permit and opening and operating permit. Please refer to NC 1
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	☒ Yes ☐ No O1 Details: The facility tries to finish the formalities for getting facility opening and operating permit. Please refer to NC 1
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	☐ Yes ☒ No P1 If yes, how does the company obtain FPIC: The facility main production processes is not risky regarding land rights.
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	☐ Yes ☒ No Q1 Details: The facility does not have building construction permit. Please refer to NC 1
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	☒ Yes ☐ No R1 Details: There is no land acquisition. In case a land acquisition, the facility applies to municipality and fulfil the obligations regarding environmental impact assessment, constructions permit etc.

S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	☐ Yes ☒ No S1 Details: There is no evidence
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Non-compliance:	
1. Description of non-compliance: ☒ NC against ETI/Additional Elements ☒ NC against Local Law ☐ NC against customer code: NC 1: It was noted that opening and operation permit of the facility was not observed. Local law and/or ETI requirement: Regulation for facility opening and operating permit (10/8/2005), II. Section Art 6 (Changed first clause: 19/3/2007 – 2007/11882 K.) – It is not allowed that the facility is not opened and operated without “Opening and Operating Permit” that is taken from local authorities properly. ETI 0.B.2 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with Recommended corrective action: Its recommended to provide the business opening and operating license for the whole facility area.	Objective evidence observed: DOCUMENT REVIEW/ MANAGEMENT INTERVIEW

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

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

1: Freely Chosen Employment

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

ETI

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

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

Current Systems and Evidence Examined

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

Current systems:

The factory has a policy against forced labour and the policy was reviewed by auditor.

There was a non-formalised application procedure which states that workers must present their ID's

There was no forced or bonded labour at the company.

Movement of employees at the facility were not limited.

Employees have free access to toilets and drinkable water.

Overtimes are always performed on voluntary basis.

Employment was freely chosen.

Workers were free to leave and were not required to lodge deposits or ID papers with their employers.

The above was confirmed in management and worker interview.

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

Details:

Policy documents

Personnel files and pay-slips

Disciplinary records

Employees' interviews

Labor contracts

Any other comments: None

A: Is there any evidence of retention of original documents, e.g. passports/ID's	☐ Yes ☒ No A1: If yes, please give details and category of workers affected:
B: Is there any evidence of a loan scheme in operation	☐ Yes ☒ No B1: If yes, please give details and category of worker affected:
C: Is there any evidence of retention of wages /deposits	☐ Yes ☒ No C1: If yes, please give details and category of worker affected:
D: Are there any restrictions on workers' freedom to terminate employment?	☐ Yes ☒ No D1: Please describe finding:

E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	☐ Yes ☐ No ☒ Not applicable E1: Please describe finding:
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	☐ Yes ☒ No F1: Please describe finding:
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	☒ Yes ☐ No ☐ Not applicable G1: If yes, please give details and category of workers affected:
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	☒ Yes ☐ No H1: Please describe finding: They have policy and procedures risks of forced labor.

Non-compliance:	
1. Description of non-compliance: ☐ NC against ETI ☐ NC against Local Law: ☐ NC against customer code: None Observed Local law and/or ETI requirement Not Applicable Recommended corrective action: Not Applicable	Objective evidence observed: NA

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

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

2: Freedom of Association and Right to Collective Bargaining are Respected

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

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

ETI

2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.

2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

Current Systems and Evidence Examined

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

Current systems:

There is no Trade Union in the facility. Company does not restrict workers to join or form any union which is asked during interviews.

There was an open-door policy in operation at the company. Employees may appeal their grievances or suggestions directly to their supervisors. Also, employees stated that they can use suggestion boxes to express their opinions and they can share the issues with Worker Representative.

There is 1 worker representative for general working conditions.

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

Details:

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

Any other comments: None

A: What form of worker representation/union is there on site?	☐ Union (name) ☐ Worker Committee ☒ Other (specify) (Open-door policy, worker representative, suggestion boxes) ☐ None
B: Is it a legal requirement to have a union?	☐ Yes ☒ No
C: Is it a legal requirement to have a worker's committee?	☐ Yes ☒ No

D: Is there any other form of effective worker/management communication channel? (<i>Other than union/worker committee e.g. H&S, sexual harassment</i>)	☒ Yes ☐ No D1: Please give details: Employees declared that they can go directly to the management for their suggestions whenever they want. In addition to this, Suggestion boxes are placed in several places of the company. D2: Is there evidence of free elections? ☒ Yes ☐ No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	☐ Yes ☐ No E1: Please give details: NA. There is no union at the facility.	
F: Name of union and union representative, if applicable:	There is no Union in the facility.	F1: Is there evidence of free elections? ☐ Yes ☐ No ☒ N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	There is no Union in the facility.	G1: Is there evidence of free elections? ☐ Yes ☐ No ☒ N/A
H: Are all workers aware of who their representatives are?	☒ Yes ☐ No	
I: Were worker representatives freely elected?	☒ Yes ☐ No	I1: Date of last election: 14.05.2018
J: Do workers know what topics can be raised with their representatives?	☒ Yes ☐ No	
K: Were worker representatives/union representatives interviewed?	☒ Yes ☐ No If Yes , please state how many: 1	
L: Please describe any evidence that union/worker's committee is effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i>	There is no union/worker's committee at the facility.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	☐ Yes ☒ No	
If Yes , what percentage by trade Union/worker representation	M1: <u>NA</u> % workers covered by Union CBA	M2: <u>NA</u> % workers covered by worker rep CBA
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	☐ Yes ☐ No NA	

Non-compliance:	
1. Description of non-compliance: ☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code: None Observed Local law and/or ETI requirement: Not applicable Recommended corrective action: Not applicable	Objective evidence observed: Not applicable

Observation:	
Description of observation: None Observed Local law and/or ETI requirement: Not applicable Recommended corrective action: Not applicable	Objective evidence observed: Not applicable

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

3: Working Conditions are Safe and Hygienic

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

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

ETI

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. General Health and Safety management

- Potable water was freely available in all areas.
- Risk assessment was conducted in October 2018.
- Emergency case plans were provided inside the facility.
- Minutes of meetings show that there are meetings once every month between the H&S committee (workers) and the H&S manager, and each point is acted on.

2. Fire Safety

- There were at least 2 exits from each work area
- Firefighting equipment (fire extinguishers and fire hose) was adequate and checks were up-to-date.

3. Electrical safety

- All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards.
- There were competent electricians at the site and their training certificates were available for review.

4. Chemical safety

Chemicals are not used at the facility.

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

Details:

- Health and safety policy
- Health and safety manual
- Health and safety committee minutes
- Training records and certificates
- Fire equipment maintenance records
- Fire drill records
- Government licenses and checks on air quality and noise level
- Accident reports
- Sanitation permit for kitchen
- Health certificates for kitchen staff
- Potable water testing certificates

- Interviews with H&S manager
- Interviews with workers and H&S committee members
Any other comments: None

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	☒ Yes ☐ No A1: Please give details: There is detailed HS policy and procedures.
B: Are the policies included in workers' manuals?	☒ Yes ☐ No B1: Please give details: The HS procedures are provided to all workers, also in employee files. There are flyers for HS issues provided.
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	☐ Yes ☒ No C1: Please give details: There is no additional building without permission provided.
D: Are visitors to the site informed on H&S and provided with personal protective equipment	☒ Yes ☐ No D1: Please give details: All PPE required is provided free of charge and with no limit. The facility is very good at HS PPE.
E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.	☐ Yes ☒ No E1: Please give details: Not required by law.
F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	☒ Yes ☐ No F1: Please give details: There is 1 first aider employee at the facility.
G: Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	☐ Yes ☐ No G1: Please give details: NA
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	☐ Yes ☐ No H1: Please give details: NA, no accommodation provided
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	☒ Yes ☐ No I1: Please give details: Related risks are included.

J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	☒ Yes ☐ No J1: Please give details: The facility has taken the measures for the disposal of natural sources.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	☒ Yes ☐ No K1: Please give details: No chemicals.

Non-compliance:	
1. Description of non-compliance: ☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code: None Observed Local law and/or ETI requirement: Not applicable Recommended corrective action: Not applicable	Objective evidence observed: Not applicable

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

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

4: Child Labour Shall Not Be Used

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

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

ETI

4.1 There shall be no new recruitment of child labour.

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

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

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

Current Systems and Evidence Examined

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

Current systems:

No child labour was noted at the facility.

There was child remediation procedure at the facility.

Minimum age in the facility is 26.

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

Details:

- ID Copies of employees
- Personnel file
- Child labour policy
- Management and employees' interviews

Any other comments:

None

A: Legal age of employment:	15
B: Age of youngest worker found:	26
C: Are there children present on the work floor but not working at the time of audit?	☐ Yes ☒ No
D: % of under 18's at this site (of total workers)	0 %
E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	☐ Yes ☒ No E1: If yes, give details

Non-compliance:	
1. Description of non-compliance: ☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code: None Observed Local law and/or ETI requirement Not Applicable Recommended corrective action: Not Applicable	Objective evidence observed: Not Applicable

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

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

5: Living Wages are Paid

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

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

ETI

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

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

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

Current Systems and Evidence Examined

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

Current systems:

There was no employee under the legal minimum wage.

Payslip is given to the employees.

Payment Day: 5th of each month.

All employees were paid at least minimum wage.

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

{2.029,50 TL/month (Gross), 1603,12 TL/month (Net including minimum subsistence allowance) Since 1st January 2018----2558,40 TL / month (Gross), 2020,90 TL / month (Net including minimum subsistence allowance) since 1th January 2019}

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

Details:

• 2 employees' wage and attendance records were reviewed for December 2019 (last paid month), September 2019 (nonpeak month) and March 2019 (non-peak month)..

• Social insurance records

• Employees' & management interviews

• Labour contracts

Any other comments: None:

Non-compliance:

1. Description of non-compliance:

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

NC 2: The minimum wages of the employees' are paid through bank via official payrolls that submitted to social insurance agency. The rest of the wages and overtime wages are paid by cash. Management provided all records to the auditors during audit day. The payments are done correctly and on-time in the facility.

Objective evidence observed:

DOCUMENT REVIEW
MANAGEMENT
INTERVIEW
EMPLOYEE INTERVIEW

Local law and/or ETI requirement:

The Turkish Regulation on Overtime and Extra Work art 10, The overtime and extra works payments included with normal working hours payment that are given to employees are paid according to Turkish Labor Law. This payment has to be clearly shown on payroll documentation and on pay slips, which are given to employees according to Turkish Labor Law.

In accordance with Social Insurance and General Health Insurance Law; #5510/2006, Rev: 08.05.2008, Art. 80. The social insurance premiums of the employees are calculated and paid based on gross total wage paid to the employees in the related month.

Turkish Labor Law # 4857 / 2003, ARTICLE 32-In general terms, the wage shall mean the amount provided and paid in cash to a person by the employer or third persons against performance of a designated work. Basically, the wage is paid as Turkish currency in the working place or deposit in a bank account in the name of the worker. Where it is agreed to pay the wage in foreign currency, Turkish equivalent of the agreed amount is calculated and paid over the current forex rate prevailing on the date of payment. The wages may not be paid in the form of bill payable to order (bond), or coupon or any other valuable paper alleged to represent a currency effective in the country. In accordance with Regulation about Compensation of all kinds of rights such as Wage, Bonus, Premium through Bank Accounts; No: 27058, Date: 18.11.2008, Art. 10.

If the facility has at least 10 employees, net wages of the employees should be paid through bank account after the cut of legal deductions from gross wages.

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

Recommended corrective action: It is recommended that full amounts of all wages are paid through bank accounts via official payrolls.

Observation:

Description of observation: None Observed

Local law and/or ETI requirement: Not applicable

Recommended corrective action: Not applicable

Objective evidence observed:

Not applicable

Good Examples observed:

Description of Good Example (GE):

GE 1: Meal is provided free of charge to all employees at the facility.

Objective Evidence Observed:

Employee Interview,
Document Review

Summary Information

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: 45 hours/week	A1: 45 hours/week	A2: ☐ Yes ☒ No
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 11 total working hours per day (regular + overtime), 270 overtime hours per year	B1: 11 total working hours per day (regular + overtime), 270 overtime hours per year (was not seen in the samples)	B2: ☐ Yes ☒ No
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: {Since January 1st, 2018: 2029,50 TL (Gross), 1450,91 TL (Net) / month-Since January 1st, 2019: 2558,40TL (Gross), 1829,03 TL (Net) / month}.	C1: At least legal minimum pay was paid to all workers {Since January 1st, 2018: 2029,50 TL (Gross), 1450,91 TL (Net) / month-Since January 1st, 2019: 2558,40TL (Gross), 1829,03 TL (Net) / month}.	C2: ☐ Yes ☒ No
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 150% for overtime in weekdays and weekends. Overtime premium for national/religious holidays is 200% (The employee gets one day salary for the related national holiday even though she/he does not work on this day. If she/he work ,	D1: 150% for overtime in weekdays and weekends. Overtime premium for national/religious holidays is 200% (The employee gets one day salary for the related national holiday even though she/he does not work on this day. If she/he work , then additional 1	D2: ☐ Yes ☒ No

	then additional 1 day salary is given to him/her; so the rate totally paid to him/her became 200% in case of doing overtime in national /religious holidays)	day salary is given to him/her; so the rate totally paid to him/her became 200% in case of doing overtime in national /religious holidays)	
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Wages analysis: (Click here to return to Key Information)		
A: Were accurate records shown at the first request?	☒ Yes ☐ No	
A1: If No , why not?	NA	
B: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	2 employees' wage and attendance records were reviewed for December 2019 (last paid month), September 2019 (nonpeak month) and March 2019 (non-peak month).	
C: Are there different legal minimum wage grades? If Yes , please specify all.	☐ Yes ☒ No	C1: If Yes , please give details: NA
D: If there are different legal minimum grades, are all workers graded and paid correctly?	☐ Yes ☐ No ☒ N/A	D1: If No , please give details: NA
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	☐ Below legal min ☒ Meet ☒ Above	E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> 2029,50 TL TL/month including subsistence allowance (Gross)
F: Please indicate the breakdown of workforce per earnings:	F1: ____% of workforce earning under minimum wage F2: <u>1</u> % of workforce earning minimum wage (Lunch hall) F3: <u>99</u> % of workforce earning above minimum wage	
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i>	

	No bonus payment was done.		
H: What deductions are required by law e.g. social insurance? Please state all types:	Social insurance and taxes		
I: Have these deductions been made?	☒ Yes ☐ No	I1: Please list all deductions that have been made.	1.Taxes 2.Social Insurance Please describe:
		I2: Please list all deductions that have not been made.	1.Meal 2. Please describe:
J: Were appropriate records available to verify hours of work and wages?	☒ Yes ☐ No		
K: Were any inconsistencies found? (if yes describe nature)	☐ Yes ☒ No	☐ Poor record keeping ☐ Isolated incident ☐ Repeated occurrence: NA	
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	☒ Yes ☐ No Please give details: The records reflect all time worked.		
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	☐ Yes ☒ No Please specify amount/time: NA		
M2: If yes, what was the calculation method used.	☐ ISEAL/Anker Benchmarks ☐ Asia Floor Wage ☐ Figures provided by Unions ☐ Living Wage Foundation UK ☐ Fair Wear Wage Ladder ☐ Fairtrade Foundation Other – please give details: NA		
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	☐ Yes ☒ No N1: Please give details:		
O: Are workers paid in a timely manner in line with local law?	☒ Yes ☐ No		

P: Is there evidence that equal rates are being paid for equal work:	☒ Yes ☐ No P1: Please give details: It was confirmed through employee and management interviews and document review; equal rates are paid for equal work.
Q: How are workers paid:	☒ Cash ☐ Cheque ☒ Bank Transfer ☐ Other Q1: If other, please explain:

6: Working Hours are not Excessive

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

ETI

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

Time recording System: Finger Scanning Time Recording System

Regular working hours has been arranged as below :

From 08:30 to 19:00 with 60' lunch break and 15'x2 tea breaks X 5 days

Through employees' interview, overtime is voluntary.

2 employees' wage and attendance records were reviewed for December 2019 (last paid month), September 2019 (nonpeak month) and March 2019 (non-peak month).

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

Time records

Payroll records

Attendance records of employees

Management interview

Employee interviews

Details: Attendance records of employees were reviewed.
Any other comments: None

Non-compliance:

Description of non-compliance:

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

None observed

Local law and/or ETI requirement: Not applicable

Recommended corrective action: Not applicable

Objective evidence observed:

Not applicable

Observation:

Description of observation: None Observed

Local law or ETI requirement: Not applicable

Comments: Not applicable

Objective evidence observed:

Not applicable

Good Examples observed:

Description of Good Example (GE): None Observed

Objective Evidence Observed:

Not applicable

Working hours' analysis

Please include time e.g. hour/week/month
([Go back to Key information](#))

Systems & Processes

A. What timekeeping systems are used: time card etc.

Describe: Finger Print Time recording system

B: Is sample size same as in wages section?

☒ Yes
☐ No

B1: If no, please give details

C: Are standard/contracted working hours defined in all contracts/employment agreements?	☒ Yes ☐ No	<i>C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.</i> Please give details: NA			
D: Are there any other types of contracts/employment agreements used?	☐ Yes ☒ No	<i>D1: If YES, please complete as appropriate: NA</i>			
		☐ 0 hrs	☐ Part time	☐ Variable hrs	☐ Other
		If "Other", Please define:			
		NA			
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	☐ Yes ☒ No	<i>E1: If yes, please detail hours, %, types of workers affected and frequency</i> Please give details: NA			
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: ☒ 1 in 7 days ☐ 2 in 14 days ☐ No If 'No', please explain:	F3: Is this allowed by local law? ☒ Yes ☐ No			
		<i>Maximum number of days worked without a day off (in sample):</i>			
		5 days /week			
Standard/Contracted Hours worked					
G: Were standard working hours over 48 hours per week found?	☐ Yes ☒ No	G1: If yes, % of workers & frequency:			
		NA			
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	☐ Yes ☐ No NA	H1: If yes, please give details:			
		NA			
Overtime Hours worked					

I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 4 Hours/ per a month-Last paid (December 2019) 0 Hours / per a month-nonpeak (September 2019) 8 Hours / per a month-peak (March 2019)	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	☐ Yes ☒ No	
K: Approximate percentage of total workers on highest overtime hours:	___100___%	
L: Is overtime voluntary?	☒ Yes ☐ No ☐ Conflicting Information	<i>L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements:</i> Worker interviews
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	☒ Yes ☐ No ☐ N/A	<i>M1: Please give details of normal day overtime premium as a % of standard wages:</i> 150% for overtime in weekdays and weekends. Overtime premium for national/religious holidays is 200% (The employee gets one day salary for the related national holiday even though she/he does not work on this day. If she/he works, then additional 1 day salary is given to him/her; so the rate totally paid to him/her became 200% in case of doing overtime in national /religious holidays)
N: Is overtime paid at a premium?	☒ Yes ☐ No	<i>N1: If yes, please describe % of workers & frequency:</i> All employees who work overtime is paid monthly in accordance with the law.
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	☐ No ☐ Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) ☐ Collective Bargaining agreements ☐ Other NA	
	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other	

	NA
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	☐ Overtime is voluntary NA ☐ Onsite Collective bargaining allows 60+ hours/week ☐ Safeguards are in place to protect worker's health and safety ☐ Site can demonstrate exceptional circumstances ☐ Other reasons (please specify)
	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	☐ Yes ☒ No Q1: If yes, please give details:
R: 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

7: No Discrimination is Practiced

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

ETI

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

Current Systems and Evidence Examined

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

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

No evidence against discrimination requirements of the client was found during the audit processes.

Employees stated that they were paid and treated equally.

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

Details: Personnel files and payrolls of sampled employees, disciplinary records, employee interviews, termination records, attendance records, hiring and termination policy.

Any other comments: None

A: Gender breakdown of Management + Supervisors <i>(Include as one combined group)</i>	A1: Male: <u>71</u> % A2: Female <u>29</u> %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	None
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	☐ Hiring ☐ Compensation ☐ Access to training ☐ Promotion ☐ Termination or retirement ☒ No evidence of discrimination found C1: Please give details: NA

Professional Development

A: What type of training and development are available for workers?	None
---	------

B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	☒ Yes ☐ No If no, please give details: NA
--	--

Non-compliance:	
1. Description of non-compliance: ☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code: None Observed Local law and/or ETI requirement: Not applicable Recommended corrective action: Not applicable	Objective evidence observed: Not applicable

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

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

8: Regular Employment Is Provided

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

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

ETI

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current systems:

Employees' labour contracts were available in their personnel files.

Labour contracts were in accordance with the laws and regulations.

A copy of employment contract was given to employees.

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

Details:

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

Management & employees' interviews.

Any other comments:

None

Non-compliance:	
1. Description of non-compliance: ☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code: None Observed Local law and/or ETI requirement: Not applicable Recommended corrective action: Not applicable	Objective evidence observed: Not applicable

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

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

Responsible Recruitment

All Workers	
A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	☒ Terms & Conditions presented ☒ Understood by workers ☒ Same as actual conditions A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	☐ Yes ☒ No B1: If yes, please describe details and specific category(ies) of workers affected:

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

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

NON-EMPLOYEE WORKERS

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

Agency Workers (if applicable)	
<i>(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)</i>	
A: Number of agencies used (average):	A1: Names if available: There are no agency workers.
B: Were agency workers' age / pay / hours included within the scope of this audit?	☐ Yes ☐ No NA
C: Were sufficient documents for agency workers available for review?	☐ Yes ☐ No NA
D: Is there a legal contract / agreement with all agencies?	☐ Yes ☐ No NA

	D1: Please give details: NA
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	☐ Yes ☐ No E1: Please give details: NA

Contractors: <i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i>	
A: Any contractors on site?	☐ Yes ☒ No A1: If yes, how many contractors are present, please give details:
B: If Yes , how many workers supplied by contractors?	NA
C: Do all contractor workers understand their terms of employment?	☐ Yes ☐ No C1: Please describe finding: NA
D: If Yes , please give evidence for contractor workers being paid per law:	NA

8A: Sub-Contracting and Homeworking

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

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

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

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

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems:

No subcontractor is used by the facility.

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

Employees from every unit were selected and interviewed.

Selected employees' personnel files were checked.

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

Details:

Management Interview

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

Details: None

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against Local Law

☐ NC against customer code:

None Observed

Local law and/or ETI /Additional Elements requirement:

Not Applicable

Recommended corrective action:

Not Applicable

Objective evidence observed:

Not Applicable

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

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

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

Summary of homeworking – if applicable			
☒ Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	☐ Yes ☐ No A1: If Yes , summarise details: NA		
B: Number of homeworkers	B1: Male: NA	B2: Female: NA	Total: NA

C: Are homeworkers employed direct or through agents?	☐ Directly ☐ Through Agents	C1: If through agents, number of agents: NA
D: Is there a site policy on homeworking?	☐ Yes ☐ No NA	
E: How does the site ensure worker hours and pay meet local laws for homeworkers?	NA	
F: What processes are carried out by homeworkers?	NA	
G: Do any contracts exist for homeworkers?	☐ Yes ☐ No G1: Please give details: NA	
H: Are full records of homeworkers available at the site?	☐ Yes ☐ No NA	

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

ETI

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

Additional elements:

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 rd party?	☒ Yes ☐ No A1: Please give details: There are published, anonymous and/or open channels available for reporting any violations of Labour standards. The employees can report to the legal authorities.
B: If Yes , are workers aware of these channels and have access? Please give details.	Yes, all were aware.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Open door policy, suggestion boxes
D: Which of the following groups is there a grievance mechanism in place for?	☐ Workers ☐ Communities ☐ Suppliers ☒ Other (Suggestion boxes and open door policy) D1: Please give details: There is no transparent and well-communicated system in place at the facility to enable external stakeholders to report to the company on Human Rights issues (grievances), without fear of reprisals towards the reporter.
E: Are there any open disputes?	☐ Yes ☒ No E1: If yes, please give details NA
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	☒ Yes ☐ No F1: If no, please give details NA
G: Is there a published and transparent disciplinary procedure?	☒ Yes ☐ No G1: If no, please explain There is a transparent and well-communicated system in place at the facility.

H: If yes, are workers aware of these the disciplinary procedure?	☒ Yes ☐ No H1: If no, please give details NA
I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	☐ Yes ☒ No I1: If yes, please give details

Current Systems and Evidence Examined

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

Current systems: There was no evidence of any physical abuse or discipline, the threat of physical abuse, sexual or any other types of harassment or verbal abuse as well as any other forms of intimidation were not noted, as confirmed by the interviews. Disciplinary regulation was compliant with the legal regulations.

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

Details: Disciplinary regulation of the facility and the personnel files of the sampled employees, suggestion records were reviewed, Employee interviews were conducted,
Any other comments: None

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code: None Observed

Local law and/or ETI requirement: Not applicable

Recommended corrective action: Not applicable

Objective evidence observed:

Not applicable

Observation:

Description of observation: None Observed

Local law or ETI requirement: Not applicable

Comments: Not applicable

Objective evidence observed:

Not applicable

Good Examples observed:

Description of Good Example (GE):
None Observed

Objective Evidence Observed:

Not Applicable

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

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

Additional Elements

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

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

Current Systems and Evidence Examined

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

Current systems:

All workers are local. No migrant worker is employed.

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

Details:

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

Any other comments: None

Non-compliance:

1. Description of non-compliance:

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

None Observed

Local law and/or ETI requirement:

Not Applicable

Recommended corrective action:

Not Applicable

Objective evidence observed:

Not Applicable

Observation:

Description of observation: None Observed

Local law or ETI requirement: Not Applicable

Not Applicable

Objective evidence observed:

Not Applicable

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

10. Other issue areas 10B2: Environment 2–Pillar

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

To be completed for a 2–Pillar SMETA Audit, and remove the following page which is 10B4 environment 4 pillar

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

10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements. Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.

Current Systems and Evidence Examined

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

Current systems:

There is a written environment policy of the facility.
Facility complies with environment requirements.
Facility was aware the client requirement.

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

Details:

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

Any other comments: None

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:
None Observed

Local law and/or ETI requirement:

Not Applicable

Recommended corrective action:

Not Applicable

Objective evidence observed:

Not Applicable

Observation:

Description of observation: None Observed

Local law or ETI requirement: Not Applicable

Not Applicable

Objective evidence observed:

Not Applicable

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

Other findings

Other Findings Outside the Scope of the Code
None

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

Appendix 1

Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary." ☒ Not Applicable please x	
NOTE: The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.	Instruction to Audit Company: fill in the relevant clauses from the Customer Supplier Code - where applicable.
ETI Code / Additional Elements	Customer's Supplier Code equivalent
0.A. Universal Rights covering UNGP	0.A. Universal Rights covering UNGP
0.A. Guidance for Observations 0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers. 0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights 0.A.3 Businesses shall identify their stakeholders and salient issues. 0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights. 0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation. 0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.	
0.B. Management Systems & Code Implementation	0.B. Management Systems & Code Implementation
0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.	

0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code. 0.3 Suppliers are expected to communicate this Code to all employees. 0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.	
ETI 1. Forced Labour	ETI 1. Forced Labour
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.	
ETI 2. Freedom of association and the right to collective bargaining are respected	ETI 2. Freedom of association and the right to collective bargaining are respected
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.	
ETI 3. Working conditions are safe and hygienic	ETI 3. Working conditions are safe and hygienic
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.	
ETI 4. Child labour shall not be used	ETI 4. Child labour shall not be used
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.	
ETI 5. Living wages are paid	ETI 5. Living wages are paid
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.	
ETI 6. Working Hours are not excessive	ETI 6. Working Hours are not excessive
6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards. 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.	

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay. 6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below. 6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where all of the following are met: – this is allowed by national law; – this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce; – appropriate safeguards are taken to protect the workers' health and safety; and – The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies. 6.6 Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.	
ETI 7. No discrimination is practised	ETI 7. No discrimination is practised
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.	
ETI 8. Regular employment is provided	ETI 8. Regular employment is provided
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.	
8A: Sub-Contracting and Homeworking	8A: Sub-Contracting and Homeworking
8A.1 There should be no sub-contracting unless previously agreed with the main client. 8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.	
ETI 9. No harsh or inhumane treatment is allowed	ETI 9. No harsh or inhumane treatment is allowed
9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. Additional elements: 9.2 companies should provide access to a confidential grievance mechanism for all workers	
10. Other Issue areas: 10A: Entitlement to Work and Immigration	
Additional Elements 10A.1 Only workers with a legal right to work shall be employed or used by the supplier. 10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.	
10. Other issue areas 10B2: Environment 2-Pillar	

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

10C. Compliance Requirements

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

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

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

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

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

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

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

10C. Guidance for Observations

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

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

Photo Form

		
Outview of the facility	First aid kit	Fire cabin
		
Emergency exit ground signs	Alarm button	Visual alarm
		
Anti slip tape	Lunc hall	Announcement board
		
Smoke detector	Emergency exit door	Prayer room

		
Accessory warehouse	Kitchen	Gas detector
		
Potable water	Evacuation plan	Fire extinguisher
		
Eye protection cover	Sample sewing area	Ironing area
		
Electricity panel	Rechargeable lamp	Fire stairs

		
Toilet	Suggestion box	Sample cutting area
		
Hoist	Shoulder belt	Steel Gloves
		
Time recording system	Main alarm panel	ETI Base Code on the board
		
Ventilation	Assembly area	

DISCLAIMER:

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

End of report.



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

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

[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

[http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

[Click here for Supplier \(B\) members:](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)

[http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)

[Click here for Auditors:](https://www.surveymonkey.co.uk/r/BRTVCKP)

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



SMETA Corrective Action Plan Report (CAPR)

Version 6.1



Audit Details			
Sedex Company Reference: (only available on Sedex System)	ZC: The facility is not registered in the Sedex system yet / İşletme Sedex sistemine üye değildir.	Sedex Site Reference: (only available on Sedex System)	ZS: The facility is not registered in the Sedex system yet / İşletme Sedex sistemine üye değildir.
Business name (Company name):	ANKATEKS MODA GIYIM SANAYI VE DIS TICARET LTD.STI.		
Site name:	ANKATEKS MODA GIYIM SANAYI VE DIS TICARET LTD.STI.		
Site address: (Please include full address)	KEMALPASA MAH. 1929. SOK. 2/41 BAGCILAR - ISTANBUL	Country:	TÜRKİYE / TURKEY
Site contact and job title:	A.KEREM AYDIN – INSAN KAYNAKLARI VE SOSYAL UYGUNLUK SORUMLUSU / HUMAN RESOURCES & SOCIAL COMPLIANCE RESPONSIBLE.		
Site phone:	+90 212 430 24 82	Site e-mail:	aydinkeremm@gmail.com
SMETA Audit Pillars:	☒ Labour Standards	☒ Health & Safety (plus Environment 2-Pillar)	☐ Environment 4-pillar ☐ Business Ethics
Date of Audit:	20.01.2020		

Audit Company Name & Logo: 	Report Owner (payer): ANKATEKS MODA GIYIM SANAYI VE DIS TICARET LTD.STI.
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Audit Conducted By					
Affiliate Audit Company	☒	Purchaser	☐	Retailer	☐
Brand owner	☐	NGO	☐	Trade Union	☐
Multi-stakeholder	☐	Combined Audit (select all that apply)			

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

Any exceptions to this must be recorded here (e.g. different sample size):); İşletmede toplam 9 çalışan vardır ve 2 çalışan üretim çalışanıdır. Bu nedenle , görüşmeler 2 üretim çalışanı ile yapılmıştır / There are totally 9 employees in the facility, and 2 of them are in production. Therefore , the interviews are done with these 2 production employees.

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

Lead auditor: GIZEM OZTURK-Auditor (ASCA21700502)

Team auditor: YOKTUR / NONE

Interviewers: GIZEM OZTURK

Report writer: GIZEM OZTURK

Report reviewer: RAMA RAO (REVIEWER)

Date of declaration: 20.01.2020

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

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

Audit Parameters

Audit Parameters			
A: Time in and time out	Day 1 Time in: 09:30 Day 1 Time out: 17:00	Day 2 Time in: NA Day 2 Time out: NA	Day 3 Time in: NA Day 3 Time out: NA
B: Number of auditor days used:	1 DENETÇİ X 1 GÜN / 1 AUDITOR X 1 DAY		
C: Audit type:	☐ Full Initial ☒ Periodic ☐ Full Follow-up ☐ Partial Follow-Up ☐ Partial Other If other, please define:		
D: Was the audit announced?	☒ Announced ☐ Semi – announced: Window detail : ☐ Unannounced		
E: Was the Sedex SAQ available for review?	☐ Yes ☒ No If No, The facility is not registered in the Sedex system yet.		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	☐ Yes NA ☐ No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	A. KEREM AYDIN – INSAN KAYNAKLARI VE SOSYAL UYGUNLUK SORUMLUSU / HUMAN RESOURCES & SOCIAL COMPLIANCE RESPONSIBLE		
H: Is further information available (if yes, please contact audit company for details)	☐ Yes ☒ No		
I: Previous audit date:	29.11.2018		
J: Previous audit type:	Full initial - Smeta 2 pillar audit		
K: Were any previous audits reviewed for this audit	☐ Yes ☒ No ☐ N/A		

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

A: Present at the opening meeting?	☒ Yes ☐ No	☐ Yes ☒ No	☐ Yes ☒ No
B: Present at the audit?	☒ Yes ☐ No	☒ Yes ☐ No	☐ Yes ☒ No
C: Present at the closing meeting?	☒ Yes ☐ No	☐ Yes ☒ No	☐ Yes ☒ No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	İşletmede 1 çalışan temsilcisi vardır ve temsilci görüşmelere katılmıştır./ There is 1 worker representative in the facility and he was included in the employee interviews.		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	İşletmede sendika yoktur. / There is no union in the facility.		

Guidance

The Corrective Action Plan Report summarises the site audit findings and a corrective, and preventative action plan that both the auditor and the site manager believe is reasonable to ensure conformity with the ETI Base Code, Local Laws and additional audited requirements. After the initial audit, the form is used to re-record actions taken and to categorise the status of the non-compliances.

N.B. observations and good practice examples should be pointed out at the closing meeting as well as discussing non-compliances and corrective actions.

To ensure that good practice examples are highlighted to the supplier and to give a more 'balanced' audit a section to record these has been provided on the CAPR document (see following pages) which will remain with the supplier. They will be further confirmed on receipt of the audit report.

Root cause (see column 4)

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

See SMETA BPG Chapter 7 'Audit Execution' for more explanation of "root cause".

Next Steps:

1. The site shall request, via Sedex, that the audit body upload the audit report, non-compliances, observations and good examples. If you have not already received instructions on how to do this then please visit the web site www.sedexglobal.com.
2. Sites shall action its non-compliances and document its progress via Sedex.
3. Once the site has effectively progressed through its actions then it shall request via Sedex that the audit body verify its actions. Please visit www.sedexglobal.com web site for information on how to do this.
4. The audit body shall verify corrective actions taken by the site by either a "Desk-Top" review process via Sedex or by Follow-up Audit (see point 5).
5. Some non-compliances that cannot be closed off by "Desk-Top" review may need to be closed off via a "1 Day Follow Up Audit" charged at normal fee rates. If this is the case, then the site will be notified after its submission of documentary evidence relating to that non-compliance. Any follow-up audit must take place within twelve months of the initial audit and the information from the initial audit must be available for sign off of corrective action.
6. For changes to wages and hours to be correctly verified it will normally require a follow up site visit. Auditors will generally require to see a minimum of two months wages and hours records, showing new rates in order to confirm changes (note some clients may ask for a longer period, if in doubt please check with the client).

Corrective Action Plan

Corrective Action Plan – non-compliances									
Non-Compliance Number <i>The reference number of the non-compliance from the Audit Report, for example, Discrimination No.7</i>	New or Carried Over <i>Is this a new non-compliance identified at the follow-up or one carried over (C) that is still outstanding</i>	Details of Non-Compliance <i>Details of Non-Compliance</i>	Root cause <i>(completed by the site)</i>	Preventative and Corrective Actions <i>Details of actions to be taken to clear non-compliance, and the system change to prevent re-occurrence (agreed between site and auditor)</i>	Timescale <i>(Immediate, 30, 60, 90,180,365)</i>	Verification Method <i>Desktop / Follow-Up [D/F]</i>	Agreed by Management and Name of Responsible Person: <i>Note if management agree to the non-compliance, and document name of responsible person</i>	Verification Evidence and Comments <i>Details on corrective action evidence</i>	Status <i>Open/Closed or comment</i>
YÖNETİM SİSTEMLERİ NO: 0B ETİ, YK	YENİ	İşletmeye ait işyeri açma ve çalıştırma ruhsatı görülememiştir.	☐ Training ☒ Systems ☐ Costs ☐ lack of workers ☐ Other – please give details:	Lütfen tüm işletmeyi kapsayan işyeri açma ve çalıştırma ruhsatı sağlayınız.	365 GÜN	MASAUSTU	EVET/YES A.KEREM AYDIN INSAN KAYNAKLARI VE SOSYAL UYGUNLUK SORUMLUSU / HUMAN RESOURCES & SOCIAL COMPLIANCE RESPONSIBLE.		
MANAGEMENT SYSTEMS AND CODE IMPLEMENTATION NO: 0B ETİ, LL #1	NEW	It was noted that business opening and operation permit of the facility was not observed.		Its recommended to provide the business opening and operating license for the whole facility area	365 DAYS	DESKTOP			
ODEMELER VE HAKLAR No: 5 ETİ,YK	YENİ	İşletmede çalışanların normal maaşlarının asgari ücret kısmının sosyal sigortalar kurumuna sunulan resmi bordro üzerinden banka kanalıyla ödendiği tespit	☐ Training ☒ Systems ☐ Costs ☐ lack of workers ☐ Other – please give details:	Lütfen tüm ödemelerin banka kanalıyla resmi bordro üzerinden ödenmesini sağlayınız.	365 GÜN	TAKIP DENETİMİ	EVET/YES A.KEREM AYDIN INSAN KAYNAKLARI VE SOSYAL UYGUNLUK		

WAGES AND BENEFITS No: 5 ETI, LL #2	NEW	edilmiştir. Normal maaşların bakiyeleri ve fazla mesailer elden ödenmektedir. Yönetim denetim esnasında tüm kayıtları denetçilere sunmuştur. İşletmede ödemeler zamanında ve tam olarak yapılmaktadır The minimum wages of the employees' are paid through bank via official payrolls that submitted to social insurance agency. The rest of the wages and overtime wages are paid by cash. Management provided all records to the auditors during audit day. The payments are done correctly and on-time in the facility.		It is recommended that full amounts of all wages are paid through bank accounts via official payrolls.	365 DAYS	FOLLOW UP	SORUMLUSU / HUMAN RESOURCES & SOCIAL COMPLIANCE RESPONSIBLE.		
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Corrective Action Plan – Observations

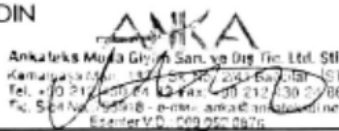
Observation Number <i>The reference number of the observation from the Audit Report, for example, Discrimination No.7</i>	New or Carried Over <i>Is this a new observation identified at the follow-up or one carried over (C) that is still outstanding</i>	Details of Observation <i>Details of Observation</i>	Root cause <i>(completed by the site)</i>	Any improvement actions discussed <i>(Not uploaded on to SEDEX)</i>
		Yoktur / None		

Good examples

Good example Number <i>The reference number of the good example from the Audit Report, for example, Discrimination No.7</i>	Details of good example noted	Any relevant Evidence and Comments
ÖDEMELER & HAKLAR No:5 WAGE AND BENEFITS No:5 #1	İşletmede tüm çalışanlara ücretsiz olarak yemek sağlanmaktadır. Meal is provided free of charge to all employees at the facility.	Personel görüşmeleri , ödeme kayıtları Employee interviews and wage records.

Confirmation

Please sign this document confirming that the above findings have been discussed with and understood by you: (site management)
If actual signatures are not possible in electronic versions, please state the name of the signatory in applicable boxes, as indicating the signature.

A: Site Representative Signature:	A.KEREM AYDIN  Ankateks Müde Giyim San. ve Tic. Ltd. Sti. Kamalyaş Mah. 137. Sokak No: 204/2 Kat: 1ST Tel: +90 212 400 44 44 Fax: +90 212 430 32 86 E: San. A. - 408918 - e-posta: ankateks@ankateks.net E-posta: Y.D. - 009 250 0876	Title INSAN KAYNAKLARI VE SOSYAL UYGUNLUK SORUMLUSU / HUMAN RESOURCES & SOCIAL COMPLIANCE RESPONSIBLE. Date 20.01.2020
B: Auditor Signature:	GIZEM OZTURK 	Title BAS DENETCI / LEAD AUDITOR Date 20.01.2020
C: Please indicate below if you, the site management, dispute any of the findings. No need to complete D-E, if no disputes.		
D: I dispute the following numbered non-compliances: YOKTUR / NONE		
E: Signed: (If any entry in box D, please complete a signature on this line)	NA	Title NA Date
F: Any other site Comments: YOKTUR / NONE		

Guidance on Root Cause

Explanation of the Root Cause Column

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

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

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

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

Some examples of finding a “root cause”

Example 1

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

Example 2

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

Example 3

A site uses fines to control unacceptable behaviour of workers.

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

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

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

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

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

Disclaimer

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

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



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

[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

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