




# Sedex Members Ethical Trade Audit Report

**Version 6.1**



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 402482290	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 402489103
Business name (Company name):	Pelin Triko A.S.		
Site name:	Pelin Triko A.S.		
Site address: <i>(Please include full address)</i>	Yeni Mahalle 5.Sok.No:13 Canik Samsun	Country:	Turkey
Site contact and job title:	Serap Kahyaoglu / Human Resource Responsible		
Site phone:	0090 0362 238 22 73	Site e-mail:	serap@pelintriko.com.tr
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar <input checked="" type="checkbox"/> Business Ethics
Date of Audit:	22-23-24/08/2022		

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

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

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



## Audit Content:

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

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

### 2-Pillar SMETA Audit

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

### 4-Pillar SMETA

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

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

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

## SMETA Declaration

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

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

Any exceptions to this must be recorded here (e.g. different sample size): Group interview is not conducted because of Covid-19 illness

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

Lead auditor: RAMAZAN OZDEMIR- SENIOR AUDITOR      APSCA number: RA 21704227

Lead auditor APSCA status: RA

Team auditor: NA      APSCA number:

Interviewers: RAMAZAN OZDEMIR-SENIOR AUDTOR      APSCA number: RA 21704227

Report writer: RAMAZAN OZDEMIR

Report reviewer: NALAN GUNGOR

Date of declaration: 24.08.2022

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

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

## Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i> <i>Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A <a href="#">Universal Rights covering UNGP</a>			<input type="checkbox"/>	<input type="checkbox"/>		0	0	<ul style="list-style-type: none"> <li>None observed</li> </ul>
0B <a href="#">Management systems and code implementation</a>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> <li>None observed</li> </ul>
1. <a href="#">Freely chosen Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> <li>None observed</li> </ul>
2. <a href="#">Freedom of Association</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> <li>None observed</li> </ul>
3. <a href="#">Safety and Hygienic Conditions</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	3	0	0	<ul style="list-style-type: none"> <li>It was noted that emergency exit ways are partially blocked on the sewing, knitting sections. There is enough emergency exit door on the floors.</li> <li>It was noted that fire drill is conducted on 14.04.2022 and it was conducted just for day shift. 23 employees who are newly hired were not attended to the fire drill</li> <li>It was noted that there is no periodical inspection report for the water fire system</li> </ul>
4. <a href="#">Child Labour</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> <li>None observed</li> </ul>

5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	1	<ul style="list-style-type: none"> <li>GE : Meal and transportation is provided charge of free.</li> </ul>
6	<u>Working Hours</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> <li>It was noted that weekend overtime working practices were done between 08:00-13:00 and 20 minutes break is given to the workers.</li> </ul>
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> <li>None observed</li> </ul>
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> <li>None observed</li> </ul>
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> <li>None observed</li> </ul>
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> <li>None observed</li> </ul>
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> <li>None observed</li> </ul>
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	NA	NA	Not applicable
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> <li>None observed</li> </ul>
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	<ul style="list-style-type: none"> <li>None observed</li> </ul>

General observations and summary of the site:

**Site summary:**

- Main processes of the facility are knitting of the jersey fabric, cutting sewing packaging.
- Pelin Triko was established in 2006
- Overall responsibility for meeting the standards is taken by SERAP KAHYAOGU Human Resource Responsible
- There are 141 workers on site.
- The youngest worker' age is 18 years old.
- There are 4 worker representatives at the facility.

- There is no union at this facility.
- 10 workers were selected for interview including 4 male and 6 female employees, no group interview is conducted because of Covid-19
- 26 employees' wage & time records October 2021 (non-peak month) and July 2022 (last paid), May 2022 (non-peak) were reviewed.
- Finger printing time recording system is available.
- There is no peak season at the facility.
- Payment Period: Monthly.
- Payment Day: Between 15<sup>th</sup> of each month.

Working hours are:

- 07:45 to 18:00, 90 minutes break in a day Monday – Friday,

Working hours in the knitting section.

- 08:00-16:00 30 minutes break
- 16:00- 00:00 30 minutes break
- 00:00-08:00 30 minutes break

- The population of the factory is: 141 employees  
Administration: 10 (2 male, 8 female)  
Production employees: 111 (75 female, 36 male)  
ISKUR employees : 20 ( 2 male , Female : 18 )

# of young employee: 0  
# of pregnant employee: 2  
# of disabled employee: 3  
# Maternity leave: 0  
#Migrant: 0

#### Audit Process

At 10:30 am on 22<sup>nd</sup> August 2022 Ramazan OZDEMIR / 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 SERAP KAHYAOGLU / HR MANAGER

In view of the findings raised, below non-compliances were found in the area , Wage and Benefits and Working Hours. For other areas no non-compliance was noted.



**HEALTH AND SAFETY**

- It was noted that emergency exit ways are partially blocked on the sewing, knitting sections. There is enough emergency exit door on the floors.
- It was noted that fire drill is conducted on 14.04.2022 and it was conducted just for day shift. 23 employees who are newly hired were not attended to the fire drill
- It was noted that there is no periodical inspection report for the water fire system
- 

**WORKING HOURS**

- It was noted that weekend overtime working practices were done between 08:00-13:00 and 20 minutes break is given to the workers.

*\*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:	Pelin Triko A.S.																						
B: Site name:	Pelin Triko A.S.																						
C: GPS location: (If available)	GPS Address: Yeni Mahalle 5.Sok.No:13 Canik Samsun	Latitude: 41°16'27.1"N Longitude: 36°21'09.6"E																					
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	7280729812																						
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Knitting of the fabric, Sewing, Packaging																						
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Pelin Triko was established in December 2006 and located in the Samsun. The structure is concrete. Total closed area is 1493 sqm. There is no dormitory at the facility. The structure is concrete.</p> <table border="1"> <thead> <tr> <th>Production Building no</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Floor 1</td> <td>Administration offices</td> <td>NA</td> </tr> <tr> <td>Floor 2</td> <td>Knitting, Sewing, packaging</td> <td>NA</td> </tr> <tr> <td>Floor 3</td> <td>Knitting, Sewing</td> <td>NA</td> </tr> <tr> <td>Floor 4</td> <td>Knitting Sewing,</td> <td>NA</td> </tr> <tr> <td>Floor 5</td> <td>Doctor Room, Lunch Hall, Health and Safety Room,</td> <td>NA</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td>NA</td> </tr> </tbody> </table> <p>For below, please add any extra rows if appropriate.</p> <p>F1: Visible structural integrity issues (large cracks) observed?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: There was no cracks on the structure</p> <p>F3: Does the site have a structural engineer evaluation?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>		Production Building no	Description	Remark, if any	Floor 1	Administration offices	NA	Floor 2	Knitting, Sewing, packaging	NA	Floor 3	Knitting, Sewing	NA	Floor 4	Knitting Sewing,	NA	Floor 5	Doctor Room, Lunch Hall, Health and Safety Room,	NA	Is this a shared building?	No	NA
Production Building no	Description	Remark, if any																					
Floor 1	Administration offices	NA																					
Floor 2	Knitting, Sewing, packaging	NA																					
Floor 3	Knitting, Sewing	NA																					
Floor 4	Knitting Sewing,	NA																					
Floor 5	Doctor Room, Lunch Hall, Health and Safety Room,	NA																					
Is this a shared building?	No	NA																					

	F4: Please give details: There is a structural engineer evaluation
G: Site function:	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor
H: Month(s) of peak season: (if applicable)	Stable
I: Process overview: <i>(Include products being produced, main operations, number of production lines, main equipment used)</i>	<p>Main products textile products.</p> <ul style="list-style-type: none"> <li>• Main processes of the facility are knitting of the fabric, cutting, sewing , packaging.</li> </ul> <p>There are 3 production lines, 2 washing machines, 3 drying machines, 1 metal detector, 1 lift , 1 compressor and 1 steam boiler</p>
J: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (Open door policy, suggestion boxes and 6 worker representatives) <input type="checkbox"/> None
K: Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No NA If No, please give details

Audit Parameters			
A: Time in and time out	Day 1 Time in: 09:00 Day 1 Time out: 16:30	Day 2 Time in: 09:30 Day 2 Time out: 16:30	Day 3 Time in: 09:00 Day 3 Time out: 14:00
B: Number of auditor days used:	1 AUDITOR 2,5 DAY / 1 DENETCI 2,5 GUN		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define:		
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 4 weeks 01.08.2022- 31.08.2022 <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If <b>Yes</b> , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	SERAP KAHYAOGLU / INSAN KAYNAKLARI / HUMAN RESOURCE RESPONSIBLE		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	18.08.2022		
J: Previous audit type:	BSCI		
K: Were any previous audits reviewed for this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  <input type="checkbox"/> N/A		

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

B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	İşletmede 4 çalışan temsilcisi bulunmaktadır. 1 çalışan temsilcisi denetim kapsamına dahil edilmiştir. / There are 4 worker representatives at the facility. 1 of them was included the audit scope.		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	İşletmede sendika bulunmamaktadır. / There is no union at 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*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	38*	2	0	0	0	0	0	40*
Worker numbers – female	83*	18	0	0	0	0	0	101*
Total	121*	0	0	0	0	0	0	141*
Number of Workers interviewed – male	4	0	0	0	0	0	0	4
Number of Workers interviewed – female	6	0	0	0	0	0	0	6
Total – interviewed sample size	10	0	0	0	0	0	0	10



A: Nationality of Management	TURKISH	
<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first.</p> <p><i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities:</p> <p>B1: Nationality 1: TURKISH</p> <p>B2: Nationality 2: _____</p> <p>B3: Nationality 3: _____</p>	<p>Was the list completed during peak season?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No NA</p> <p>If no, please describe how this may vary during peak periods:</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx % total workforce: Nationality 1 _100_</p> <p>C1: approx % total workforce: Nationality 2 _____</p> <p>C2: approx % total workforce: Nationality 3 _____</p>	
D: Worker remuneration (management information)	<p>D: _____% workers on piece rate</p> <p>D1: 100_% hourly paid workers</p> <p>D2: _____% salaried workers</p> <p>Payment cycle:</p> <p>D3: _____% daily paid</p> <p>D4: _____% weekly paid</p> <p>D5: 100 % monthly paid</p> <p>D6: _____% other</p> <p>D7: If other, please give details</p>	



Worker Interview Summary	
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	No group interview is conducted because of Covid-19
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 4      D1: Female : 6
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If N, please give details
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
H: What was the most common worker complaint?	None
I: What did the workers like the most about working at this site?	Payments on time, management attitude.
J: Any additional comment(s) regarding interviews:	None
K: Attitude of workers to hours worked:	They are happy regarding working hours.
L. Is there any worker survey information available?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details:	
M: Attitude of workers: <i>(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk</i>	



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

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

There was no union in the facility. There were 4 employee representatives in the facility. One worker representative was interviewed during on audit day and was very helpful, positive.

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

Management was helpful during the audit process.

## Audit Results by Clause

<p><b>0A: Universal Rights covering UNGP</b>  <a href="#">(Click here to return to summary of findings)</a></p>
<p><b>0.A. Guidance for Observations</b></p> <p>0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.</p> <p>0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights</p> <p>0.A.3 Businesses shall identify their stakeholders and salient issues.</p> <p>0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.</p> <p>0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.</p> <p>0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.</p> <p>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.</p>

<p><b>Current Systems and Evidence Examined</b></p> <p><i>To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.</i></p>
<p><b>Current systems:</b></p> <p>The facility has social compliance policy and procedures that includes supplier management.          Social compliance responsible is authorized as SERAP KAHYAOGU / HUMAN RESOURCE RESPONSIBLE          The facility has not supply chain mapping that includes suppliers.          The facility has grievance mechanism for both internal and external business partners</p> <p><b>Evidence examined – to support system description (Documents examined &amp; relevant comments. Include renewal/expiry date where appropriate):</b></p> <p>Details:          Social compliance policy and related procedures          Authorization letter of social compliance responsible          Grievance Mechanism Feedbacks          Management interview          Employee interviews</p> <p>Any other comments: None</p>

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  A1: Please give details: There are policies statements</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Please give details:                  Name: AYNUR SAMILOGLU / COC RESPONSIBLE</p>
<p>C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Please give details: The facility has suggestion box placed at several places and that checked by Quality Management System Specialist, OHS specialist and Worker Representative.</p>
<p>D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  If no, please give details:</p>
<p>E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  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.</p>

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

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

## Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 2021 _2___ %	A2: This year 2022 _3___ %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 <sup>st</sup> day of 90 day period + number of employees on the last day of the 90 day period) / 2]	1,63 %	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 <sup>st</sup> day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 2021 _3___ %	C2: This year 2022 _1___ %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 <sup>st</sup> of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	1%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe:	
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: 2021 Number: 4	F2: This year: 2022 Number: 1
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]	1	
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: 2022	H2: This year: 2021
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months __1___% workers	I2: 12 months __1___% workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months __1___% workers	J2: 12 months __1___% 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 the AYNUR SAMILOGLU / COC RESPONSIBLE

**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:**

<p>A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  Please describe: NA</p>
<p>B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment &amp; abuse?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Please describe: Policies and procedures about reduce the risk of forced labour, child labour, discrimination and harassment &amp; abuse are available.</p>
<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>Policies exist for all areas (Forced labour, Health and Safety, Wages, Working Hours, and No harsh</p>

	<p>treatment, Environment, Business Ethics, Child Labour, Recruitment, Discrimination and Sub-contracting.), these are communicated to workers via poster.</p> <p>Through documents review and workers interview, policy on 'No harsh treatment and Environment' was fully in compliance with the code.</p> <p>Workers stated no forced labour, no child labour was found (through interview and document checks), there were both female and male among management/supervisors.</p>
<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment &amp; abuse?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  Please describe: These policy and procedures are communicated to staff through.</p>
<p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  Please describe: Training records are available</p>
<p>F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  Please describe: NA</p>
<p>G: Is there a Human Resources manager/department? If Yes, please detail.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  Please describe: SERAP KAHYAOGU /HR RESPONSIBLE</p>
<p>H: Is there a senior person / manager responsible for implementation of the code</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  Please describe: SERAP KAHYAOGU /HR RESPONSIBLE"</p>
<p>I: Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  Please describe: All worker information is kept on their personnel files. These files are kept on HR room.</p>
<p>J: Is there an effective procedure to ensure confidential information is kept confidential?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  Please describe: All worker information is kept on their personnel files. These files are kept on HR room.</p>
<p>K: Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  Details: Health and Safety Risk assessment includes policy and procedures effectiveness.</p>

<p>L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Details: The facility performs a corrective action plan for the findings that addressed on risk assessment.</p>
<p>M: Does the facility have a policy/code which require labour standards of its own suppliers?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Please give details: Codes are handled to suppliers and service providers.</p>
<p><b>Land rights</b></p>	
<p>N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Details: The facility has construction permit</p>
<p>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?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Details: The facility fulfils the requirements during getting facility opening and operating permit. Also, the facility has construction permit.</p>
<p>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</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  If yes, how does the company obtain FPIC: The facility has environmental out of scope letter impact assessment. The facility main production processes are not risky regarding land rights.</p>
<p>Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Details: The facility has rental agreement in accordance with the law.</p>
<p>R: Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Details: There is no land acquisition. In case a land acquisition, the facility applies to municipality and fulfil the obligations regarding opening and operating permit and construction permit etc.</p>
<p>S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  S1: Please give details: NA</p>

**Non-compliance:**



<p><b>Description of non-compliance:</b></p> <p><input type="checkbox"/> NC against ETI/Additional Elements      <input type="checkbox"/> NC against Local Law</p> <p><input type="checkbox"/> NC against customer code:</p> <p>Not applicable</p> <p><b>Local law and/or ETI requirement:</b> Not Applicable</p> <p><b>Recommended corrective action:</b> Not Applicable</p>	<p><b>Objective evidence observed:</b></p> <p>Not applicable</p>
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Observation:	
<p><b>Description of observation:</b> None observed</p> <p><b>Local law or ETI requirement:</b> NA</p> <p><b>Comments:</b> NA</p>	<p><b>Objective evidence observed:</b></p> <p>Management Interview</p>

Good Examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p><b>Objective evidence observed:</b></p> <p>Not applicable</p>

**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  
 Worker interviews  
 Personnel files and pay-slips  
 Disciplinary records  
 Employee interviews  
 Labor contracts

Any other comments: None

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

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

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

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

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Good Examples observed:	
Description of Good Example (GE):	Objective evidence observed:

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

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

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

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

There is no union at the facility.  
 There is open door policy in facility that employees can complain & suggest directly to the top management.  
 (Declared by workers during interviews) There were complaint/suggestion boxes in the company. Also, there were four worker representatives).  
 Company does not restrict workers to join or form any union which is asked during interviews.  
 Employees may appeal their grievances or suggestions directly to their supervisors. Also, employees stated that they can use suggestion boxes to express their opinions and they can share the issues with worker Representative.

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

- Details:
- Management interview
  - Worker 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 (Open-door policy, suggestion boxes, worker representatives)
- None

B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
C: Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Describe: 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.  Is there evidence of free elections? <input checked="" type="checkbox"/> Yes (for worker representative) <input type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input type="checkbox"/> Yes <input type="checkbox"/> No Details: N/A. There was no union or worker committee in the facility	
F: Name of union and union representative, if applicable:	There is no union at the facility.	There is no union at the facility.
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	There are worker representatives, open door policy and suggestion boxes in the facility.	Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	II: Date of last election: 2021
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , please state how many: 1	
L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	There was no union or worker committee in the facility.	

M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If <b>Yes</b> , what percentage by trade Union/worker representation	____% workers covered by Union CBA	____% workers covered by Union CBA
M3: If <b>Yes</b> , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA	

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

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

Good Examples observed:	
<p><b>Description of Good Example (GE):</b> None Observed</p>	<p><b>Objective evidence observed:</b></p> <p>Not applicable</p>

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

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

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

**ETI**

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

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

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

1. General Health and Safety management

- Potable water was freely available in all areas and test certificates were up-to-date. Sufficient clean toilets segregated by gender were available at all times to workers.
- Risk assessment is revised on 2022.
- Emergency case plans were provided inside the facility.
- Emergency evacuation plans were provided in the facility
- Injury records are kept by facility.

2. Fire Safety

- The building has enough exit door from each of work area and these were clearly marked.
- Firefighting equipment was adequate and checks were up-to date.
- The fire drill conducts twice a year.
- Training had been given by fire marshals had been specially selected for extra training.

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

- There is machine oil at the facility.

There was no smoke detector and fire alarm in the warehouse

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

Details:

- Health and safety policy
- Health and safety manual
- Health and safety committee minutes



<ul style="list-style-type: none"> <li>- Training records and certificates</li> <li>- Fire equipment maintenance records</li> <li>- Fire drill records</li> <li>- Government licenses and checks on air quality and noise level</li> <li>- Accident reports</li> <li>- Sanitation permit for kitchen</li> <li>- Health certificates for kitchen staff</li> <li>- Potable water testing certificates</li> <li>- Interviews with H&amp;S manager</li> <li>- Interviews with workers and H&amp;S committee members</li> </ul> <p>Any other comments: None</p>
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<p>A: Does the facility have general and occupational Health &amp; Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The facility has Health & Safety Procedures and these procedures are shared with employees via trainings.
<p>B: Are the policies included in workers' manuals?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The facility has a detailed Health & Safety procedure and this procedure is explained in Health and Safety trainings to employees.
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details: All the buildings that the company occupies have the necessary permissions.
<p>D: Are visitors to the site informed on H&amp;S and provided with personal protective equipment</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: These information is provided by H & S specialist/ Accounting manager.
<p>E: Is a medical room or medical facility provided for workers?</p> <p>If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Doctor room meets legal requirements.
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The facility has contract with doctor. Also, there are sufficient numbers of first aiders.
<p>G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

competent persons e.g. buses and other vehicles?	Details: Documentation is provided for review for compliance.
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input type="checkbox"/> Yes NA <input type="checkbox"/> No Details: There is no accomandation
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The risk assessment has working hour's section.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Related documents were reviewed. (EIA is out of scope)
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input type="checkbox"/> Yes NA <input type="checkbox"/> No Please describe: No banned chemical is used by the facility.

<b>Non-compliance:</b>	
<p><b>1. Description of non-compliance:</b>  <input checked="" type="checkbox"/> NC against ETI    <input checked="" type="checkbox"/> NC against Local Law    <input type="checkbox"/> NC against customer code:</p> <p>It was noted that emergency exit ways are partially blocked on the sewing, knitting sections. There is enough emergency exit door on the floors.</p> <p><b>Local law and/or ETI requirement:</b> In accordance with the Regulation on Protection Of Buildings Against Fire (19.12.2007 ), Art 31- (1) The exit way is defined as the not blocked way starting from any part of the building till the street at the ground level. Within the scope of escape routes;                      a) Exits from rooms and other independent spaces,                      b) Corridors and similar passages on each floor,                      c) Floor exits,                      d) Stairs reaching the ground floor,                      d) The roads leading from the entrances of the stairs on the ground floor to the last exit of the building on the same floor,                      e) Last exit,                      are included.                      The elevators cannot be accepted as exit way                      According to ETI ; 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p><b>Recommended corrective action:</b> It is recommended to ensure that emergency exit routes are accessible easily</p>	<p><b>Objective evidence observed:</b></p> <p>Facility Tour</p>

<p><b>2. Description of non-compliance:</b>  <input checked="" type="checkbox"/> NC against ETI    <input checked="" type="checkbox"/> NC against Local Law    <input type="checkbox"/> NC against customer code:</p> <p>It was noted that fire drill is conducted on 14.04.2022 and it was conducted just for day shift. 23 employees who are newly hired were not attended to the fire drill</p> <p><b>Local law and/or ETI requirement:</b> In accordance with the Regulation on Protection Of Buildings Against Fire (19.12.2007) , article 129 the fire drill should be conducted at least once per year. According to ETI ; 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p><b>Recommended corrective action:</b> It is recommended to ensure that all of employees attend to fire drill, and fire drill is conducted for all shifts</p>	<p><b>Objective evidence observed:</b></p> <p>Document Review</p>
<p><b>3. Description of non-compliance:</b>  <input checked="" type="checkbox"/> NC against ETI    <input checked="" type="checkbox"/> NC against Local Law    <input type="checkbox"/> NC against customer code:</p> <p>It was noted that there is no periodical inspection report for the water fire system</p> <p><b>Local law and/or ETI requirement:</b>          In accordance with Turkish Regulation about Occupational Health and Safety circumstances using work equipments (25/04/2013) No: 28628 Inspection of work equipment</p> <p>Art.7 – (1) Below-mentioned issues are obeyed in controlling of work equipment used in workplace</p> <p>a) Work equipment's control is done by persons who have authorization to do periodical controls after set up and before first time set up and when change of place, document which proofs that set up is done correctly and equipment works safely.</p> <p>b) Work equipments' periodical controls are done by persons who have authorization to do periodical controls</p> <p>c) Control results are recorded and kept as to be shown whenever authorities want</p> <p>According to ETI ; 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p><b>Recommended corrective action:</b> It is recommended to provide periodical inspection report for water fire system</p>	<p><b>Objective evidence observed:</b></p> <p>Facility Tour</p>

**Observation:**

<p><b>Description of observation:</b> None Observed</p> <p><b>Local law or ETI requirement:</b> Not applicable</p> <p><b>Comments:</b> Not applicable</p>	<p><b>Objective evidence observed:</b></p> <p>Not applicable</p>
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<p><b>Good Examples observed:</b></p>	
<p><b>Description of Good Example (GE):</b> None Observed</p>	<p><b>Objective evidence observed:</b></p> <p>Not applicable</p>

**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:**

Minimum age in the facility is 18.  
 Child labour remediation plan has reviewed during the audit day. Facility has control system for ages of the employees during the recruitment process. There was no child labour at the facility. Facility has a child labour policy and young labour policy that confirms ILO Standards.

**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 employee interviews

Any other comments: None

A: Legal age of employment:	15
B: Age of youngest worker found:	18
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0 %
E: Are workers under 18 subject to hazardous work assignments?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<a href="#">(Go to clause 3 – Health and Safety)</a>	E1: If yes, give details
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Non-compliance:	
<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI    <input type="checkbox"/> NC against Local Law    <input type="checkbox"/> NC against customer code:                      None Observed</p> <p><b>Local law and/or ETI requirement:</b> Not applicable</p> <p><b>Recommended corrective action:</b> Not applicable</p>	<p><b>Objective evidence observed:</b>                      Not applicable</p>

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

Good Examples observed:	
<p><b>Description of Good Example (GE):</b> None Observed</p>	<p><b>Objective evidence observed:</b>                      Not applicable</p>

**5: Living Wages are Paid**

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

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

**ETI**

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

Payslip is given to the employees.

Wages are paid 15<sup>th</sup> of each month.

All employees were paid at least minimum wage.

Benefits such as social insurance and annual leave are provided to employees.

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

Details:

26 employees' attendance and payroll records from July 2022 (Last paid month), May 2022 (Random), October 2021 (random Month).

26 workers were selected for interview including 10 male and 16 female employees; 6 of them were interviewed individually no group interview is conducted because of Covid-19

Social insurance records

Employee & 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:

None observed

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

**Objective evidence observed:**

*(where relevant please add photo numbers)*

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

<b>Good Examples observed:</b>	
<b>Description of Good Example (GE):</b>  1- Lunch and transportation are provided free of charge to all employees.	<b>Objective Evidence Observed:</b>  1- Employee Interviews, Payment records

**Summary Information**

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal maximum: 45 hours/week	45 hours/week	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No There is no CBA in the facility.
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal maximum: 11 total working hours per day (regular + overtime), 270 overtime hours per year	Max 11 hours /day (normal+overtime)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No There is no CBA in the facility.
C: Wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: Since January 1st, 2019: 2558,40 TL (Gross-including subsistence	C1: At least legal minimum wage was paid to all workers Since January 1st, 2022: 4253 TL (Net-	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No There is no CBA in the facility.



	<p>allowance); 2020,90 (Net- including subsistence allowance) / month. Since January 1st, 2020: 2943,00 TL (Gross- including subsistence allowance); 2324,70 TL (Net- including subsistence allowance) / month.</p>	<p>including subsistence allowance) / month. (Since July 1st, 2022: 5500, 35 TL (net) / month.</p>	
<p>D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</p>	<p>Legal minimum: 150% for overtime in weekdays 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 day salary is given to him/her; so the rate totally paid to him/her became 200% in case of doing overtime in national /religious holidays)</p>	<p>D1: Overtime premium for weekdays and Saturdays: 150%, overtime premium for official holidays and Sundays: 200%</p>	<p>D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

<p><b>Wages analysis:</b> <a href="#">(Click here to return to Key Information)</a></p>	
<p>A: Were accurate records shown at the first request?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

A1: If <b>No</b> , why not?	NA		
B: Sample Size Checked <i>(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)</i>	26 employees' attendance and payroll records from May 2022 (Last paid month), July 2022 (Random Month), October 2021 (random Month).		
C: Are there different legal minimum wage grades? If <b>Yes</b> , please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	C1: If <b>Yes</b> , please give details: NA	
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	D1: If <b>No</b> , please give details: NA	
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> 5500,35 (Net- including subsistence allowance) / month.	
F: Please indicate the breakdown of workforce per earnings:	F1: ___% of workforce earning under minimum wage F2: _100___% of workforce earning minimum wage F3: ___% 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>		
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that <b>have</b> been made.	1.Taxes 2.Social insurance  Please describe: Legal deductions
		I2: Please list all deductions that <b>have not</b> been made.	1. Food 2. Transportation  Please describe: Provided free
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

<p>K: Were any inconsistencies found? (if yes describe nature)</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>K1: Type</p> <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:
<p>L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>L1: Please give details: Time recording machine records all working practices</p>	
<p>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></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>M1: Please specify amount/time:</p>	
<p>M2: If yes, what was the calculation method used.</p>	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation <p>Other – please give details: NA</p>	
<p>N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>Please give details: N/A</p>	
<p>O: Are workers paid in a timely manner in line with local law?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>P: Is there evidence that equal rates are being paid for equal work:</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>Details: All working practise and payment records for all employees kept by facility management. And payments were calculated by equal rates.</p>	
<p>Q: How are workers paid:</p>	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other <p>If other, please explain:</p>	

**6: Working Hours are not Excessive**

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

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

**ETI**

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

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

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

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

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- There is electronic time recording system for all workers at the facility. (ISKUR employees included)
- Working hours:
- 07:45 to 18:00, 90 minutes break in a day Monday – Friday,

Working hours in the knitting section.

- 08:00-16:00 30 minutes break
- 16:00- 00:00 30 minutes break
- 00:00-08:00 30 minutes break

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

Details:  
 Attendance records of employees were reviewed.  
 Interviews were conducted with employees and management.

Any other comments:  
 None Attendance records of employees were reviewed.  
 Interviews were conducted with employees and management.

<b>Non-compliance:</b>	
<p><b>1. Description of non-compliance:</b>  <input checked="" type="checkbox"/> NC against ETI      <input checked="" type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:</p> <p>It was noted that weekend overtime working practices were done between 08:00-13:00 and 20 minutes break is given to the workers.</p> <p><b>Local law and/or ETI requirement:</b></p> <p>Turkish Labour Law # 4857 / 2003, ARTICLE 68- Towards the middle of the working hours and according to local custom and working requirements, workers shall be given a rest of:</p> <ul style="list-style-type: none"> <li>a) 15 minutes in work lasting 4 hours or less.</li> <li>b) Half an hour at the Occupational working on the daily schedule over 4 hours and up to 7.5 hours (inclusive),</li> <li>c) One hour at the Occupational working on a daily working schedule longer than 7.5 hours,</li> </ul> <p>The periods of rest shall be given.          The periods of rest are a minimum and shall be given without interruption.</p> <p>However, these periods may be used by intervals according to the contracts of employment by taking into account the climate, the season, local custom and the kind of work.</p> <p>The rest indicated above are not included among working hours.</p> <p><b>Recommended corrective action:</b></p> <p>It is recommended to provide at least half an hour break for the working practices over hours and up to 7,5 hours (inclusive)</p>	<p><b>Objective evidence observed:</b></p> <p>Employee Interview</p>

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

<b>Local law or ETI requirement:</b> Not applicable	Not applicable
<b>Comments:</b> Not applicable	

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

Working hours' analysis	
Please include time e.g. hour/week/month <i>(Go back to Key information)</i>	
<b>Systems &amp; Processes</b>	
A. What timekeeping systems are used: time card etc.	Electronic finger printing system
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <i>If N, please give details</i>
C: Are standard/contracted working hours defined in <b>all</b> contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <i>C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details: NA</i>
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>D1: If YES, please complete as appropriate:</i>
	<input type="checkbox"/> 0 hrs <input type="checkbox"/> Part time <input type="checkbox"/> 0 hrs <input type="checkbox"/> Other
	If "Other", Please define:  NA
E. Do any standard/contracted working hours defined in	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>E1: If <b>yes</b>, please detail hours, %, types of workers affected and frequency. Please give details: NA</i>

contracts/employment agreements exceed 48 hours per week?		
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Maximum number of days worked without a day off (in sample):	
	6 Days	
<b>Standard/Contracted Hours worked</b>		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency:
		NA
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details:
		NA
<b>Overtime Hours worked</b>		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: Overtime hours in sample were (as minimum and maximum) 0-20 hrs/month in July 2022 (last paid month), 0-17 hrs/month in May 2022 (random month) 0-10 hrs/ month in October 2021 (random month)	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	___10___%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information

Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	<p>Please give details of normal day overtime premium as a % of <b>standard</b> wages:</p> <p>Overtime premium for general holidays: %150, religious holidays 100%</p>
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>If yes, please describe % of workers &amp; frequency:</p> <p>%100, monthly</p>
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> No NA <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other	
	<p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p>	
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> <b>Overtime is voluntary NA</b> <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify)	
	<p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p>	
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>Q1: If yes, please give details:</p>
R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	





**7: No Discrimination is Practiced**

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**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

Confirmed with management & employees' interviews as well as documents review in accordance with SMETA Best Practice Guidance and Local Law.

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

Employees stated that they were paid and treated equally.

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

Details:

- Personnel files
- Pay slips
- Disciplinary policy
- Company social compliance policy
- Employee interview

Any other comments:

NONE

<p>A: Gender breakdown of Management + Supervisors (Include as one combined group)</p>	<p>A1: Male: <u>40</u> % A2: Female <u>60</u> %</p>
<p>B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:</p>	<p>0</p>
<p>C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:</p>	<p> <input type="checkbox"/> Hiring  <input type="checkbox"/> Compensation  <input type="checkbox"/> Access to training  <input type="checkbox"/> Promotion  <input type="checkbox"/> Termination or retirement  <input checked="" type="checkbox"/> No evidence of discrimination found         </p>

	C1: Please give details:
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**Professional Development**

A: What type of training and development are available for workers?	The facility has written discipline procedure. The training about disciplinary code and procedure and disciplinary rules is conducted to employees during the hiring processes.
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B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details: NA
--	--

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

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

<b>Good Examples observed:</b>
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Description of Good Example (GE):	<b>Objective Evidence Observed:</b> Not applicable
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**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.  
Existing Labour contracts were in accordance with the laws and regulations  
All of the employees are given one copy of signed labour contracts.

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

Details:

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

Any other comments:

None

**Non-compliance:**

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

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

Good Examples observed:	
<p>Description of Good Example (GE): None Observed</p> <p>None Observed</p>	<p><b>Objective Evidence Observed:</b></p> <p>Not Applicable</p>

### Responsible Recruitment

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

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

<b>Migrant Workers:</b>			
<i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i>			
A: Type of work undertaken by migrant workers:	There is no migrant worker at the facility		
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used:  B2: Total number of (outside of local country) recruitment agencies used:		
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?	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; border-right: 1px solid black; padding-right: 5px;"> <input type="checkbox"/> Yes NA  <input type="checkbox"/> No                      C1: Please describe finding:                 </td> <td style="width: 50%; padding-left: 5px;"> <input type="checkbox"/> Yes NA  <input type="checkbox"/> No                      C1: Please describe finding:                 </td> </tr> </table>	<input type="checkbox"/> Yes NA <input type="checkbox"/> No C1: Please describe finding:	<input type="checkbox"/> Yes NA <input type="checkbox"/> No C1: Please describe finding:
<input type="checkbox"/> Yes NA <input type="checkbox"/> No C1: Please describe finding:	<input type="checkbox"/> Yes NA <input type="checkbox"/> No C1: Please describe finding:		
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>	<input type="checkbox"/> Yes NA <input type="checkbox"/> No  D1: If yes, number and example of roles:		

### NON-EMPLOYEE WORKERS

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

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):	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If yes, how many contractors are present, please give details: There is no contractor employee in the facility.
B: Were agency workers' age / pay / hours included within the scope of this audit?	There is no contractor employee in the facility.
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: There is no contractor employee in the facility.



D: Is there a legal contract / agreement with all agencies?	There is no contractor employee in the facility.
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No  E1: Please give details:

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

**8A: Sub-Contracting and Homeworking**

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

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

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

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

*Note to auditor on homeworking:*

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

The facility does not use inside subcontractor or homeworking for any production processes.

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

Details:

Production records  
Management interview

**Employee interview**

Details:

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

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

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

Summary of homeworking – if applicable			
<input checked="" type="checkbox"/> Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If <b>Yes</b> , summarise details:		
B: Number of homeworkers	B1: Male:	B1: Male:	B1: Male:

<p>C: Are homeworkers employed direct or through agents?</p>	<p><input type="checkbox"/> Directly <input type="checkbox"/> Through Agents</p>	<p><input type="checkbox"/> Directly <input type="checkbox"/> Through Agents</p>
<p>D: Is there a site policy on homeworking?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>E: How does the site ensure worker hours and pay meet local laws for homeworkers?</p>		
<p>F: What processes are carried out by homeworkers?</p>		
<p>G: Do any contracts exist for homeworkers?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>G1: Please give details:</p>	
<p>H: Are full records of homeworkers available at the site?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	

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

**ETI**

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

Additional elements:

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

<p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&amp;S or any other grievances to a 3<sup>rd</sup> party?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  A1: Please give details: There are published, anonymous and/or open channels available for reporting any violations of Labour standards. The employees can report to the legal authorities. There is suggestion box for reporting grievances.</p>
<p>B: If <b>Yes</b>, are workers aware of these channels and have access? Please give details.</p>	<p>Workers are aware of these channels but workers are trained about grievance system.   There are published, anonymous and/or open channels available for reporting any violations of Labour standards</p>
<p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<p>Suggestion boxes, employee representatives, open door policy.</p>
<p>D: Which of the following groups is there a grievance mechanism in place for?</p>	<p>D: Which of the following groups is there a grievance mechanism in place for?</p>
<p>E: Are there any open disputes?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  If yes, please give details: The facility records open disputes and takes necessary actions.</p>
<p>F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No   If no, please give details</p>
<p>G: Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No   G1: If no, please explain :</p>
<p>H: If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  If no please give details  NA</p>

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

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

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

<b>Comments:</b> Not applicable	
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<b>Good Examples observed:</b>	
Description of Good Example (GE): NA  None Observed NA	<b>Objective Evidence Observed:</b>  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 were local. No migrant worker was employed.

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

Details:

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

Any other comments: None

**Non-compliance:**

**Description of observation:** None Observed

**Local law or ETI requirement:** Not applicable

**Comments:** Not applicable

**Objective evidence observed:**

Not applicable

**Observation:**



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

**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 environmental policy of the facility.  
 Facility complies with environmental requirements.

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

Details:

Environmental documents such as environmental impact assessment, environmental policy is checked  
 Any other comments: None

**Non-compliance:**

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

- NC against ETI/Additional Elements       NC against Local Law  
 NC against customer code:  
 None Observed

**Objective evidence observed:**

Not applicable

**Local law and/or ETI /Additional Elements requirement:** Not applicable

**Recommended corrective action:** Not applicable

**Observation:**

<p><b>Description of observation:</b> None Observed.</p> <p><b>Local law or ETI/additional elements requirement:</b> Not applicable</p> <p><b>Comments:</b> Not applicable</p>	<p><b>Objective evidence observed:</b> Not applicable</p>
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<p><b>Good examples observed:</b></p>	
<p>Description of Good Example (GE): None Observed</p>	<p><b>Objective Evidence Observed:</b> Not applicable</p>

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

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

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

**B.4. Compliance Requirements**

- 10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.
- 10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.
- 10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements
- 10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.
- 10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.
- 10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4–pillar audit report and audit checks for details).
- 10B4.7 Businesses shall make continuous improvements in their environmental performance.
- 10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation
- 10B4.9 Businesses should have a nominated individual responsible for co–ordinating the site's efforts to improve environmental performance.

**B4. Guidance for Observations**

- 10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.
- 10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.

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

**Current Systems and Evidence Examined**

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

**Current System:**

The facility is aware of clients' and environmental requirements.  
 Environmental policy of the facility was issued and informed all employees.  
 The risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks was conducted.  
 Environmental training was given to employees.  
 Wastes are collected properly and sent to licensed firms.  
 The exemption letter for environmental impact assessment of the facility is available.  
 There is an environment permit.

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

Details:  
 Environmental documents

Any other comments: None

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

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

Good examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p><b>Objective Evidence Observed:</b></p> <p>Not applicable</p>

<b>Environmental Analysis</b> <i>(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)</i>	
A: Is there a manager responsible for Environmental issues (Name and Position):	ENVIRONMENTAL ENGINEER
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks was conducted by environmental responsible.
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: The information was not shared by the facility.
D: Does the site have an Environmental policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, is it publicly available? Available on announcement boards and web site.
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The facility addressed the key from their operations.
F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please give details. <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: NA
H: Have all legally required permits been shown? Please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: All permits are available.
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A I1: Please give details: The facility monitors volume of wastes. Records are available.
J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Volume of water, energy and natural resources are recorded.
K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: The facility started to environment management system. Water purification systems and treatment plant are available.

L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: The facility monitors volume of wastes. Records are available.
M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: The facility monitors volume of consumptions. Records are available.
N: Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: The facility started to environment management system.

**Usage/Discharge analysis**

Criteria	Previous year: Please state period: ____ 2021 _____	Current Year: Please state period: ____ 2022 _____
Electricity Usage: <i>Kw/hrs</i>	Not provided	Not provided
Renewable Energy Usage: <i>Kw/hrs</i>	-	-
Gas Usage: <i>Kw/hrs</i>	Not provided	Not provided
Has site completed any carbon Footprint Analysis?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If <b>Yes</b> , please state result	NA	NA
Water Sources: <i>Please list all sources e.g. lake, river, and local water authority.</i>	<ul style="list-style-type: none"> <li>• Ground water</li> <li>•</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Ground water</li> <li>•</li> <li>•</li> </ul>
Water Volume Used: <i>(m³)</i>	Not provided by the facility.	Not provided by the facility
Water Discharged: <i>Please list all receiving waters/recipients.</i>	<ul style="list-style-type: none"> <li>• Lake</li> </ul>	<ul style="list-style-type: none"> <li>• lake</li> </ul>
Water Volume Discharged: <i>(m³)</i>	Not provided m3/day	72200 m3/day
Water Volume Recycled: <i>(m³)</i>	-	-
Total waste Produced <i>(please state units)</i>	Not provided	Not provided
Total hazardous waste Produced:	Not provided	Not provided

<i>(please state units)</i>		
Waste to Recycling: <i>(please state units)</i>	Not provided	Not provided
Waste to Landfill: <i>(please state units)</i>	Not provided	Not provided
Waste to other: <i>(please give details and state units)</i>	Not provided	Not provided
Total Product Produced <i>(please state units)</i>	Not provided	Not provided



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

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

To be completed for a 4-Pillar SMETA Audit

**10C. Compliance Requirements**

- 10C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.
- 10C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.
- 10C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.
- 10C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.
- 10C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,
- 10C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics
- 10C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.

**10C. Guidance for Observations**

- 10C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.
- 10C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented

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

**Current Systems and Evidence Examined**

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

**Current systems:** The facility has social compliance policy including the main aspects of the business ethics and also detailed ethics policy. No act of corruption, extortion or embezzlement, or any form of bribery in its activities as a business enterprise is noted. The facility is aware of client's business code requirements for business practices.

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):** Social compliance policy, ethics policy, employee & management interviews

Details: None

**Non-compliance:**

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

Good examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p><b>Objective Evidence Observed:</b></p> <p>Not applicable</p>

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

D: Does the site require third parties including suppliers to complete their own business ethics training	<input type="checkbox"/> Yes <input type="checkbox"/> No  D1: Please give details:
---	---

Other findings

Other Findings Outside the Scope of the Code
NONE

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

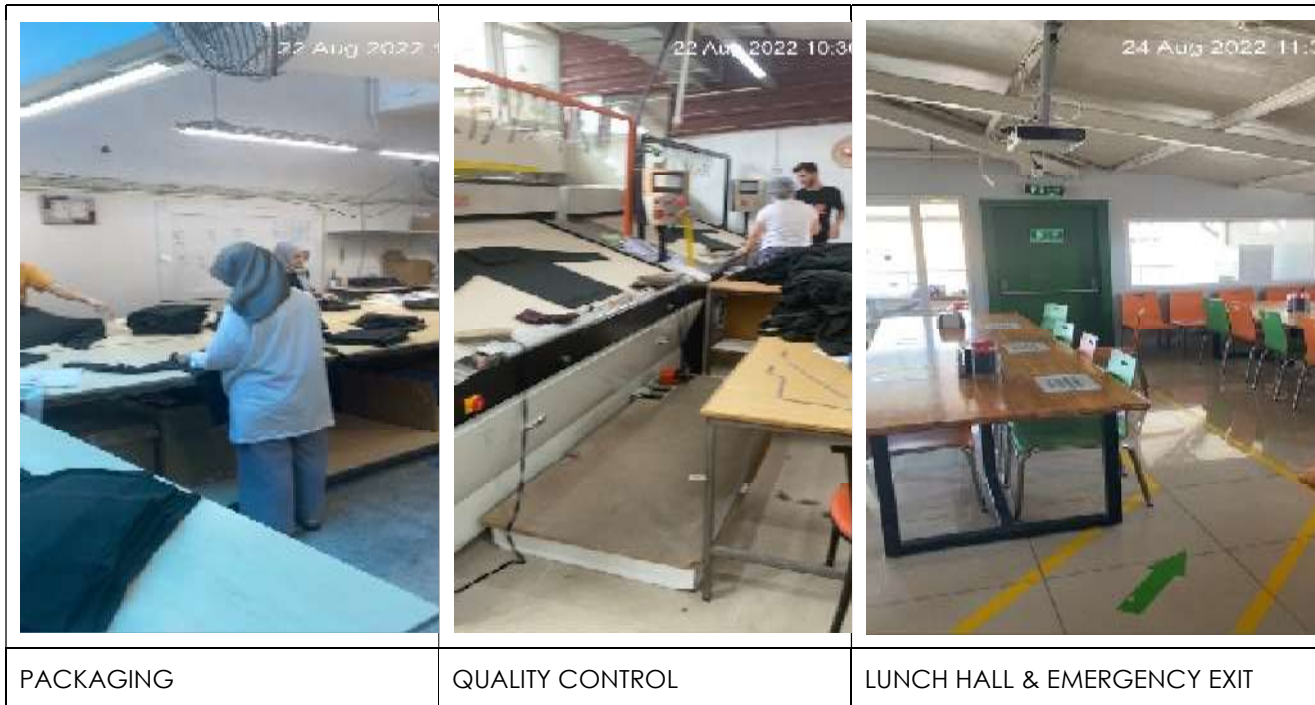
## Appendix 1




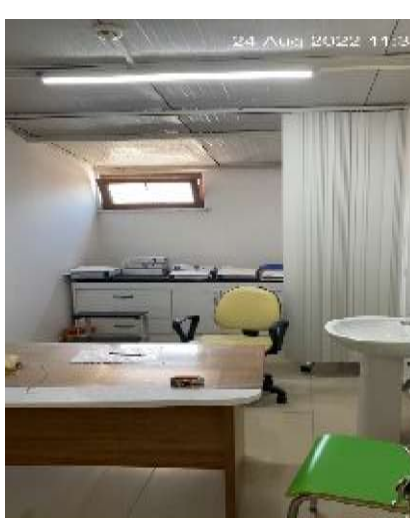


**Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective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

Not Applicable please x

## Photo Form

		
<p>OUTVIEW OF THE FACILITY</p>	<p>PRODUCTION</p>	<p>KNITTING</p>
		
<p>QUALITY</p>	<p>KNITTING</p>	<p>SEWING</p>



		
<p>POTABLE WATER</p>	<p>FIRE HOSE</p>	<p>DECLARATION CORNER</p>
		
<p>DOCTOR ROOM</p>	<p>ANTI-SLIPPERY BANT</p>	<p>FIRE ALARM BUTTON</p>





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

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

**[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](#)**

[http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw\\_3d\\_3d](http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

**[Click here for Supplier \(B\) members:](#)**

[http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY\\_2brg\\_3d\\_3d](http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)

**[Click here for Auditors:](#)**

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