




Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: (only available on Sedex System)	ZC: 416867032	Sedex Site Reference: (only available on Sedex System)	ZS 416869924	
Business name (Company name):	GRSN TEKSTIL KONFEKSIYON CORAP SANAYI VE TIC. LTD. STI.			
Site name:	GRSN TEKSTIL KONFEKSIYON CORAP SANAYI VE TIC. LTD. STI.			
Site address: (Please include full address)	KUMKISIK MAH. MENDERES BULV. NO265/A IZMIR ASF. UZERI MERKEZEFENDI DENIZLI	Country:	TURKEY	
Site contact and job title:	VEYSEL GURLESIN- FACILITY MANAGER			
Site phone:	0 258 3828001	Site e-mail:	muhasebe@gurlesin.com.tr	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar	<input type="checkbox"/> Business Ethics
Date of Audit:	29.12.2021			

Audit Company Name & Logo: 	Report Owner (payer): <i>(If paid for by the customer of the site please remove for Sedex upload)</i> GRSN TEKSTIL KONFEKSIYON CORAP SANAYI VE TIC. LTD. STI.
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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.

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): As per precautions against COVID 19 disease in the company the group interviews were not conducted only individual interviews (6) were conducted.

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

Lead auditor: SEBLA EROGLU - LEAD AUDITOR

APSCA number: RA 21702600

Lead auditor APSCA status: RA

Team auditor: NONE

Interviewers: SEBLA EROGLU - LEAD AUDITOR

Report writer: SEBLA EROGLU - LEAD AUDITOR

Report reviewer: GIZEM OZTURK-REVIEWER

Date of declaration: 29.12.2021

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

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

Summary of Findings

Issue (please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.		Area of Non-Conformity (Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)				Record the number of issues by line*:			Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
		ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A	Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>		0	0	None
0B	Management systems and code implementation		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None
1.	Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None
2	Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None
3	Safety and Hygienic Conditions	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None
4	Child Labour	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None
5	Living Wages and Benefits	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	3	GE1 Transportation is provided free of charge to all employees at the facility GE2 Meal is provided free of charge to all employees at the facility GE3 Regular premiums are paid every month to the employees. (Gross; Minimum 50 TL, maximum 500 TL/month)

6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	NA	NA	NA (THIS IS A 2 PILLAR AUDIT.)
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	NA	NA	NA (THIS IS A 2 PILLAR AUDIT.)

General observations and summary of the site:

-GRSN TEKSTIL KONFEKSIYON CORAP SANAYI VE TIC. LTD. STI. has been established on 1965 and has been operating at the current address since 2004.

-It has been seen that there is a sister company for marketing and export which name is GURLESIN KARDESLER TEKS. PETR. URN. SAN. TIC. LTD. STI. In the same building in the entrance floor. This sister company was included in the scope for facility tour.

- Products manufactured by the facility are underwear.
- There were cutting, sewing and qc sections are available.
- Facility has 5072 sqm area for production.
- The factory has a reinforced concrete building.

- Overall responsibility for meeting the standards is taken by the Mrs ESIN ELMAS KARASU (MANAGER OF HR), Mr. Veysel GURLESIN- FACILITY MANAGER Mr. ALPASLAN TURKAY (H&S EXPERT).

-Monthly Capacity for Production; 100.000 pcs/month

-There are a total of 47 employees at site (all are permanent, there is no migrant worker)

Administrative 3 (3 male)

Production: 44 (6 male and 38 female)

There were no security firm employees and no meal provider firm employee worked in the facility.

There were 2 employees worked from ISKUR (turkey employment agency)

Pregnant employees : 0, Maternity Leave employees: 0, Disabled employees : 3, Total # of young employees : 0

-Peak season: Between May to November

-Payment date: Between 05-10th of each month.

-All workers were paid at least minimum salary.

-10 workers were selected for document reviews, 2 male and 8 female. 6 of them (2 male + 4 female) were interviewed as individually.

-All workers were pleased to work in this factory.

-The employees informed that their complaints and suggestions are taken in consideration by their managers.

(80 % out of total employees took more than minimum wage and 20% out of total employees took minimum wage)

- Wage & time records of 10 sampled employees of March 2021 (Not peak month), August 2021 (peak month) and November 2021 (last payment month) were reviewed. (12 months of records were provided for review. Between November 2021 - December 2020).

- Employees worked from 07:50 to 18:00 on 5 days in a week. (They use 1 time 15 minutes tea break & 1 time 20 minutes tea break and 1 time 35 minutes meal break.) So at total they work 45 hours in a week.

- Employees worked between 06:55 to 17: 30 in a day in a week when they have overtime. (They use 1 time 15 min. & 1 time 20 minutes tea break and 1 time 40 minutes meal break. So they worked 50 minutes overtime hour in a day.)

- As per provided records the overtime status is as per noted below:

- a. 0- 0 Hours/month in March 2021 (Not peak month)
- b. 0- 27 Hours/month in August 2021 (peak month)
- c. 0-45.40 Hours/month in November 2021 (last paid and peak month)

COVID19 (proper implementations are listed below)

1-) Protective masks and face covers are provided for every worker. 2-) Additional hand disinfectants are provided especially for social areas. 3-) Risk assessment and emergency action plans have been renewed as covering COVID19 issues.

4-) Workers have been given trainings about COVID19 issues. (These trainings were given by facility doctor and facility's H&S expert)

5-) At the entrance of the facility, temperature of workers and visitors are checked with digital probe.

Audit Process

At 09:00 am on 29 December 2021, SEBLA EROGLU / SENIOR LEAD AUDITOR entered the facility then held an opening meeting according to the ETI Base Code; the facility management were present in the meeting. Opening and closing meeting was held with Mrs ESIN ELMAS KARASU (MANAGER OF HR), Mr. Veyssel GURLESIN- FACILITY MANAGER, Mr. ALPASLAN TURKAY (H&S EXPERT).

Issues found

NC's
NONE

Observations;
NONE

Best Practices Observed

Wages and Benefits

GE1

Lunch was provided free of charge to all employees.

GE2

Transportation is provided free of charge to all employees,

GE 3

Regular premiums are paid every month to the employees. (Gross; Minimum 50 TL, maximum 500 TL/month)

Additional Auditor Remark:

None

**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:	GRSN TEKSTIL KONFEKSIYON CORAP SANAYI VE TIC. LTD. STI.																
B: Site name:	GRSN TEKSTIL KONFEKSIYON CORAP SANAYI VE TIC. LTD. STI.																
C: GPS location: (If available)	GPS Address: KUMKISIK MAHALLESİ MENDERES BULVARI NO 265 A MERKEZEFENDI DENIZLI	Latitude: 37.86848302351663, Longitude: 29.029941904599255															
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	OPENNING AND OPERATING CERTIFICATE (NO VALID DATE) 12.12.2014-73																
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	UNDERWEAR (cutting, sewing and qc sections are available)																
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>GRSN TEKSTIL KONFEKSIYON CORAP SANAYI VE TIC. LTD. STI. was established on 1965. They moved to that address on 2014 Facility has 5072 sqm area for production. The factory has a reinforced concrete building.</p> <table border="1"> <thead> <tr> <th>Production Building no:1</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Floor entrance</td> <td>Administrative offices, warehouse and sister company (GURLESIN KARDESLER)</td> <td>NA</td> </tr> <tr> <td>Floor 1</td> <td>Administrative offices, warehouse, cutting, sewing, qc sections. Lunch hall, changing room and toilets.</td> <td>NA</td> </tr> <tr> <td>Floor 2</td> <td>Administrative offices,</td> <td>NA</td> </tr> <tr> <td>Is this a shared building?</td> <td>YES</td> <td>GRSN TEKSTIL AND GURLESIN KARDESLER LOCATED IN THE SAME BUILDING.</td> </tr> </tbody> </table>		Production Building no:1	Description	Remark, if any	Floor entrance	Administrative offices, warehouse and sister company (GURLESIN KARDESLER)	NA	Floor 1	Administrative offices, warehouse, cutting, sewing, qc sections. Lunch hall, changing room and toilets.	NA	Floor 2	Administrative offices,	NA	Is this a shared building?	YES	GRSN TEKSTIL AND GURLESIN KARDESLER LOCATED IN THE SAME BUILDING.
Production Building no:1	Description	Remark, if any															
Floor entrance	Administrative offices, warehouse and sister company (GURLESIN KARDESLER)	NA															
Floor 1	Administrative offices, warehouse, cutting, sewing, qc sections. Lunch hall, changing room and toilets.	NA															
Floor 2	Administrative offices,	NA															
Is this a shared building?	YES	GRSN TEKSTIL AND GURLESIN KARDESLER LOCATED IN THE SAME BUILDING.															

	<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: NA</p> <p>F3: Does the site have a structural engineer evaluation? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>F4: Please give details: FACILITY HAS OPENNING AND OPERATING CERTIFICATE.</p>
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)	BETWEEN MAY AND NOVEMBER
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	<p>Cutting, Sewing, QC, Package and Finishing sections</p> <p>There were 2 sewing lines.</p> <p>There were 65 sewing machines available.</p> <p>3 cutting machine, 2 laying machine, 5 Iron</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 (specify) worker representatives <input type="checkbox"/> None
K: Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" 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 <p>If yes approx. % of workers in on site accommodation NA</p>
M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>If Yes approx. % of workers NA</p>

<p>N: Were all site-provided accommodation buildings included in this audit</p>	<p> <input type="checkbox"/> Yes NA <input type="checkbox"/> No If No, please give details NA </p>
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Audit Parameters			
A: Time in and time out	Day 1 Time in: 09:00 Day 1 Time out: 17:00	Day 2 Time in: NA Day 2 Time out: NA	Day 3 Time in: NA Day 3 Time out: NA
B: Number of auditor days used:	1 MANDAY (1 AUDITOR X 1 DAY)		
C: Audit type:	<input checked="" type="checkbox"/> Full Initial <input 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: Between 20 December 2021-31 December 2021 <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 ; NA		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause NA		
G: Who signed and agreed CAPR (Name and job title)	. VEYSEL GURLESIN- FACILITY MANAGER		
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:	none		
J: Previous audit type:	none		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" 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)	There are 2 worker representatives in the facility. 1 out of 2 was included in the employee interviews.		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	No union was available in the company.		

Worker Analysis

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Worker Analysis								
	Local			Migrant*				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	9	0	0	0	0	0	0	9
Worker numbers – female	38	0	0	0	0	0	0	38
Total	47	0	0	0	0	0	0	47
Number of Workers interviewed – male	2	0	0	0	0	0	0	2
Number of Workers interviewed – female	4	0	0	0	0	0	0	4
Total – interviewed sample size	6	0	0	0	0	0	0	6

*That number include 3 administrative employees.

**Worker interviews are performed individually for 6 workers due to SEDEX recommendation regarding COVID-19.



A: Nationality of Management	TURKISH	
B: Please list the nationalities of all workers, with the three most common nationalities listed first. <i>Please add more nationalities as applicable to site. Add more rows if required.</i>	Main countries: TURKEY Country 1: TURKEY approx % total workforce__100__ Country 2: _____ approx % total workforce_____ Country 3: _____ approx % total workforce_____ 	Was the list completed during peak season? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please describe how this may vary during peak periods: na
C: Please provide more information for the three most common nationalities.	Nationality 1 approx % total workforce____100% TURKISH____ Nationality 2 approx % total workforce_____ Nationality 3 approx % total workforce_____ 	
D: Worker remuneration (management information)	____0_% workers on piece rate ____100% hourly paid workers ____0% salaried workers Payment cycle: ____% daily paid ____% weekly paid ____100% monthly paid ____% other – please give details	



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: (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)	No group interview because of COVID 19.	
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	Male:2	Female: 4
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, 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 received	
I: What did the workers like the most about working at this site?	It is a reliable company in all aspects, wages paid correctly and always on time. The HS precautions are all taken very seriously. The management values the suggestions of workers.	
J: Any additional comment(s) regarding interviews:	They were very natural	
K: Attitude of workers to hours worked:	Very pleased	
L. Is there any worker survey information available?		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details: na		
M: Attitude of workers:		

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

The employees were assured of confidentiality and they spoke freely of their views of the facility, They were all natural and hesitant. They all state they are treated with respect and dignity. They are all very pleased of the overall conditions.

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 is no union in the facility. There are 2 worker representatives in the facility. One worker representative was interviewed during audit days.

O: Attitude of managers:

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

They were transparent during the audit process.

Audit Results by Clause

0A: Universal Rights covering UNGP

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

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

The facility has social compliance policy and procedures that includes supplier management.

The facility management has posted ETI Base code on the notice board.

The code is communicated with suppliers through supplier visits and meetings.

There is a transparent and well-communicated e-mail and hotline system in place at the facility to enable external stakeholders to report to the company on Human Rights issues (grievances), without fear of reprisals towards the reporter.

Overall responsibility for meeting the standards is taken by VEYSEL GURLESIN- MANAGER OF FACILITY

The facility has supply chain mapping that includes its suppliers and subcontractors.

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

Details:

Company policies and procedures

Client's code of conduct

Facility tour

Employee interviews

Management interview

Any other comments: None

A: Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has a social compliance which states that human rights are respected.
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: ESIN ELMAS KARASU Job title: HR MANAGER
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There is a transparent and well-communicated e-mail and hotline system in place at the facility to enable external stakeholders to report to the company on Human Rights issues (grievances), without fear of reprisals towards the reporter.
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)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility keeps employees' documents in the separate and closed files. Access and sharing information is limited.
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	The facility keeps employees' documents in the separate and closed files.

Findings		
Finding: Observation <input type="checkbox"/> Company NC <input type="checkbox"/> Description of observation: Not observed Local law or ETI/Additional elements / customer specific requirement: Not applicable Comments: Not applicable		Objective evidence observed: Not applicable

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

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: 2020 ___2,09___ %	A2: This year 2021 ___6,45___ %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	5.33%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 2020 ___4___ %	C2: This year 2021 ___1.75___ %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	5,8 %	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: All accidents were recorded correctly.	
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: 2020 Number: 0,3	F2: This year: 2021 Number: 0,1
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: 2	H2: This year: 2
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months ___NA___% workers	I2: 12 months ___NA___% workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months ___NA___% workers	J2: 12 months ___NA___% 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 were posted onsite.
All social compliance issues are managed and monitored internally.
The employees have information regarding social compliance, social and legal rights.
The facility management has already posted ETI Base code on notice boards.
The facility has its own documented social policy that covers all issues mentioned in ETI Base Code.
Overall responsibility for meeting the standards is taken VEYSEL GURLESIN- MANAGER OF FACILITY

The factory communicated the code to their suppliers via e-mail and meetings.

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

Details:

Company policies and procedures
Client's code of conduct
Facility tour
Employee interviews
Training records
Management interview

Any other comments: None

Management Systems:

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

☐ Yes

☒ No

A1: Please give details: NA

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

☒ Yes

☐ No

B1: Please give details: There were facility policies and procedures about forced labour, child labour, discrimination, harassment & abuse. These policies were communicated to the employees.

C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	<p>The policies and procedures about forced labour, child labour, discrimination, harassment & abuse are communicated to workers via notice and trainings.</p> <p>Through documents review and workers interview, effective implementation is performed.</p>
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Employees and managers were informed regarding forced labour, child labour, discrimination, harassment & abuse.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Training records are available for review.
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).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please give details: NA
G: Is there a Human Resources manager/department? If Yes, please detail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: There was a human resource department available.
H: Is there a senior person / manager responsible for implementation of the code	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: VEYSEL GURLESIN- MANAGER OF FACILITY
I: Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: The facility keeps employees' documents in the separate and closed files.
J: Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Access and sharing information is limited.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

	K1: Please give details: Policy and procedure effectiveness was evaluated in the risk assessment
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1 Please give details: Corrective actions were taken for some identified risks.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: NA
Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The site has required legal permissions.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The site has required legal permissions.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, how does the company obtain FPIC: N/A
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The facility site compensated the owner/lessor for the land prior to the facility being built.
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details: The facility management stated that they did not consider moving another location or land acquisition.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details: N/A

Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:	Objective evidence observed: NONE

<p>NONE</p> <p>Local law and/or ETI requirement:</p> <p>NONE</p> <p>Recommended corrective action:</p> <p>NONE</p>	
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Observation:	
<p>Description of observation: None observed</p> <p>Local law or ETI requirement: Not applicable</p> <p>Comments: Not applicable</p>	<p>Objective evidence observed:</p> <p>Not applicable</p>

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

Employment was freely chosen.

Overtime practices are performed on voluntary basis.

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

Movement of employees at the facility were not limited.

Employees have free access to toilets and drinkable water.

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

Details:

Facility tour

Employee interviews

Management interview

Company policies and procedures

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 N/A
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 N/A
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 N/A
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe finding: N/A

E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable Please describe finding: NA
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: N/A
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes please give details and category of workers affected: The facility has a policy and procedure for avoiding forced / trafficked / bonded labour. No observed forced / trafficked / bonded labour. <input type="checkbox"/> Not applicable
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding: The facility has a policy and procedure for reducing the risk of forced/trafficked labour.

Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: NONE Local law and/or ETI requirement: NONE Recommended corrective action: NONE	Objective evidence observed: NONE

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

Good examples observed:

Description of Good Example (GE): None observed	Objective evidence observed: Not applicable
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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 are 2 employee representatives in the facility.
- Suggestion boxes are located in the facility.
- There is an open door policy that employees can complain directly to the top management.

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

Details:

- Facility tour
- Employee interviews
- Management interview
- Company policy and procedures

Any other comments: None

A: 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 (specify: Open door policy, worker representatives, suggestion boxes) <input type="checkbox"/> 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: There was no worker committee or similar structure in the facility. 2 worker representatives who were elected by the employees are available in the facility. Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <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 in the facility.	Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	There was no worker committee or similar structure in the facility. 2 worker representatives who were elected by the employees was available 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	Date of last election: 05.03.2021
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 Yes , please state how many: 1 worker representative	
L: Please describe any evidence that union/worker's committee is effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i>	There 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 Yes , what percentage by trade Union/worker representation	M1: ____% workers covered by Union CBA	M2: ____% workers covered by worker rep CBA

	NA	NA
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA	

Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: NONE Local law and/or ETI requirement: NONE Recommended corrective action: NONE	Objective evidence observed: NONE

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

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

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:

The fire extinguishers were marked and controlled regularly.

The last fire evacuation drill was conducted on correctly with all employees.

Risk analysis report was prepared by the occupational health and safety expert.

First aid materials were available in production areas.

There are sufficient first aider employees in the facility.

Health and Safety training was given to employees.

Periodical inspections of the work equipment were conducted correctly.

Health and safety issues are monitored internally.

Access to clean toilet facilities and potable water was provided.

Accommodation was not provided by the facility.

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

Details:

Facility tour

Risk analysis report

Health and safety training records

Potable water analysis report

Any other comments: None

COVID19 (proper implementations are listed below)

1-) Protective masks and face covers are provided for every worker.

2-) Additional hand disinfectants are provided especially for social areas.

3-) Risk assessment and emergency action plans have been renewed as covering COVID19 issues.

4-) Workers have been given trainings about COVID19 issues. (These trainings were given by facility doctor and facility's H&S expert)

5-) At the entrance of the facility, temperature of workers and visitors are checked with digital probe.

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: General Health & Safety and Occupational Health & Safety policies and procedures were prepared by occupational health and safety expert. It was shared with employees via trainings.
B: Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Worker manual was generated in the facility. Also training records are available.
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: There is no structural addition
D: Are visitors to the site informed on H&S and provided with personal protective equipment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: It is provided by administrative personnel
E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Medical facility in compliance with legal requirement is provided in the facility.
F: Is there a doctor or nurse on site or there is easy access to first aider/trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: Doctor and sufficient first aid staff are available in the facility.
G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Worker transportation is provided by the facility. Maintenance and controls of transportation are checked regularly.
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 H1: Please give details: Accommodation is not provided by the facility.
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 I1: Please give details: The risk assessments were conducted for evaluating the arrangements for workers doing overtime as well.
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 J1: Please give details: The site meets legal obligations on environmental requirements.

K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?

☒ Yes
☐ No

K1: Please give details: The site meets its customer requirements on environmental standards.

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:
NONE

Local law and/or ETI requirement:
NONE

Recommended corrective action:
NONE

Objective evidence observed:
NONE

Observation:

Description of observation: None observed

Local law or ETI requirement: Not applicable

Comments: Not applicable

Objective evidence observed:
Not applicable

Good examples observed:

Description of Good Example (GE): None observed

Objective evidence observed:

Not applicable

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:

There is no child labour in the facility.

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

There is no young employee in the facility.

The youngest employee is 19 years old in the facility.

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

Details:

Facility tour

Personnel list

Personnel files

Employee interviews

Management interview

Any other comments: None

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

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Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: NONE Local law and/or ETI requirement: NONE Recommended corrective action: NONE	Objective evidence observed: NONE

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

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

5: Living Wages are Paid

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

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

ETI

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

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

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

Current Systems and Evidence Examined

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

Current systems:

There was no employee under the legal minimum wage.

Pay slips were provided to all employees regularly.

Employees are paid at least legal minimum wage.

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

Since January 1st, 2021: 2825,90 TL (Net- including subsistence allowance) / month.

Wage & time records of 10 sampled employees of March 2021 (Not peak month), August 2021 (peak month) and November 2021 (last payment month) were reviewed. (12 months of records were provided for review. Between November 2021 - December 2020).

Standard working hours on site was 225 hours/month.

Time card system for recording is in use.

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

Details:

Payment records

Social insurance records

Employee interviews

Management interview

Any other comments: No

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer

code:

NONE

Local law and/or ETI requirement:

NONE

Recommended corrective action:

Objective evidence observed:

NONE

NONE

Observation:

Description of observation: None observed

Local law or ETI requirement: Not applicable

Comments: Not applicable

Objective evidence observed:

Not applicable

Good examples observed:

Description of Good Example (GE):

1- Meal is provided free of charge to all employees.

2-Transportation is provided free of charge to all employees.

3-Regular premiums are paid every month to the employees. (Gross; Minimum 50 TL, maximum 500 TL/month)

Objective evidence observed:

EMPLOYEE&MANAGEMENT
INTERVIEW AND
DOCUMENT REVIEW

Summary Information

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: 45 hours / week	A1: 45 hours/week	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No There is no CBA
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 11 total working hours per day (regular + overtime), 270 overtime hours per year	B1: Max 11hrs/day (regular+ overtime) Overtime hours as per documents provided by the facility	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No There is no CBA

		management in sample was; 0- 0 Hours/month in March 2021 (Not peak month) b.0- 27 Hours/month in August 2021 (peak month) c.0-45.40 Hours/month in November 2021 (last paid and peak month)	
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: Since January 1 st , 2020: 2943 TL (Gross); 2324,70 TL (Net-including subsistence allowance) / month; 2103,97 (Net excluding subsistence allowance) / month -Since January 1 st , 2021: 3577,5 TL (Gross); 2825,90 TL (Net- including subsistence allowance) / month; 2557,59 (Net excluding subsistence allowance) / month	C1: Since Since January 1 st , 2020: 2943 TL (Gross); 2324,70 TL (Net- including subsistence allowance) / month; 2103,97 (Net excluding subsistence allowance) / month -Since January 1 st , 2021: 3577,5 TL (Gross); 2825,90 TL (Net- including subsistence allowance) / month; 2557,59 (Net excluding subsistence allowance) / month	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No There is no CBA
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 150% of the regular rate of pay for weekly overtime practices and	D1: 150% of the regular rate of pay for weekly overtime practices and 200% of the	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No There is no CBA

	200% of the national holiday overtime works	national holiday overtime works.	
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Wages analysis: (Click here to return to Key Information)			
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
A1: If No , why not?	N/A		
B: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	Wage & time records of 10 sampled employees of March 2021 (randomly month), August 2021 (randomly month) and November 2021 (last payment month) were reviewed. (12 months of records were provided for review. Between November 2021 - December 2020).		
C: Are there different legal minimum wage grades? If Yes , please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	C1: If Yes , please give details: N/A	
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 No , please give details: N/A	
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> 2825,90 TL (Net-including subsistence allowance) / month for 2021 year.	
F: Please indicate the breakdown of workforce per earnings:	F1: <u> 0 </u> % of workforce earning under minimum wage F2: <u> 20 </u> % of workforce earning minimum wage F3: <u> 80 </u> % of workforce earning above minimum wage		
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: No bonus payment was done. <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 have been made.	1.Tax 2.Social Insurance

			Please describe: Legal deductions		
		I2: Please list all deductions that have not been made.	1. Meal 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				
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	K1: Type N/A <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:			
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: All attendance records reflect all time worked.				
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time: N/A				
M2: If yes, what was the calculation method used.	<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 Other – please give details: N/A - The facility has not calculated living wage.				
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: Please give details: N/A				
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				

	P1: Please give details: It was confirmed through employee and management interviews and document review; equal rates are paid for equal work.
Q: How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain: NA

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:

Employees use time cards correctly.

-10 records to show wages and hours were taken for the 3 months from the period; August 2021 (peak month), March 2021 (Non peak month) and November 2021 (Last paid month)
- (12 months of records were provided for review. Between November 2021 - December 2020).

-All workers were paid at least minimum salary.

- Employees worked from 07:30 to 17:30 on 5 days in a week. (They use 2 times 15 minutes tea break and 1 time 30 minutes meal break.) So at total they work 45 hours in a week.

-Only security employees 07:30 to 15:30, 15:30-23:30, 23:30-07:30 with 30 minutes break on 6 days in a week.

- As per provided records the overtime status is as per noted below:

0- 0 Hours/month in March 2021 (Not peak month)

- b. 0- 27 Hours/month in August 2021 (peak month)
c. 0-45.40 Hours/month in November 2021 (last paid and peak month)

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

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer

code:

NONE

Local law and/or ETI requirement:

NONE

Recommended corrective action:

NONE

Objective evidence

observed:

NONE

Observation:

Description of observation: None observed

Local law or ETI requirement: Not applicable

Comments: Not applicable

Objective evidence

observed:

Not applicable

Good examples observed:

Description of Good Example (GE): None observed

Objective evidence

observed:

Not applicable

Working hours' analysis Please include time e.g. hour/week/month (Go back to Key information)					
Systems & Processes					
A. What timekeeping systems are used: time card etc.	Describe: TIME CARD SYSTEM				
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If N, please give details				
C: Are standard/contracted working hours defined in all contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:			
D: Are there any other types of contracts/employment agreements used?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	D1: If YES, please complete as appropriate:			
		<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input checked="" type="checkbox"/> Other
		If "Other", Please define:			
		NA			
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E1: If yes , please detail hours, %, types of workers affected and frequency Please give details: NA			
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <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 A WEEK
Standard/Contracted Hours worked		
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
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 0- 0 Hours/month in March 2021 (Not peak month) 0- 27 Hours/month in August 2021 (peak month) 0-45.40 Hours/month in November 2021 (last paid and peak 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:	___30___%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: NA
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	M1: Please give details of normal day overtime premium as a % of standard wages: 150% for overtime in weekdays. Overtime premium for national/religious holidays is 200%
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	N1: If yes, please describe % of workers & frequency: All employees, 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.</p>	<div> <input type="checkbox"/> No <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 NA </div> <div> <p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p> </div> <div> <p>NA</p> </div>
<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.</p>	<div> <input type="checkbox"/> Overtime is voluntary NA <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) </div> <div> <p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p> </div> <div> <p>NONE</p> </div>
<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<div> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>Q1: If yes, please give details:</p> </div>
<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.</p>	<div> <input type="checkbox"/> Yes <input type="checkbox"/> No </div> <div> <p>NA</p> </div>

7: No Discrimination is Practiced

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

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

No evidence against discrimination requirements of the client was found during the audit processes. Employees stated that they were paid and treated equally.

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

Details:

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

Any other comments:

NONE

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: _100_ % A2: Female _0_ %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	0
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?:	<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 type="checkbox"/> No evidence of discrimination found C1: Please give details: NA

Professional Development

A: What type of training and development are available for workers?

Discrimination policy and procedure training are given to employees. Also, discipline rules are explained.

B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?

☐ Yes

☐ No

If no, please give details:

NA

Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: NONE Local law and/or ETI requirement: NONE Recommended corrective action: NONE	Objective evidence observed: NONE

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

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

8: Regular Employment Is Provided

8: Regular Employment Is Provided (Click here to return to summary of findings) (Click here to return to Key Information)
<p align="center">ETI</p> <p>8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p>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.</p> <p align="center">Additional Elements: Responsible Recruitment</p> <p>8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.</p> <p>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</p>

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 are not required to sign blank papers.
All employees were registered to the social security.
Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.

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

Details:
Personnel files
Employee interviews

Any other comments: None

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:
NONE

Local law and/or ETI requirement:

NONE

Recommended corrective action:

NONE

Objective evidence observed:

NONE

Observation:

Description of observation: None observed

Local law or ETI requirement: Not applicable

Comments: Not applicable

Objective evidence observed:

Not applicable

Good examples observed:

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

All Workers	
A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	<input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions If any are unchecked, please describe finding and specific category (ies) of workers affected: N/A
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes Please describe details and specific category (ies) of workers affected: N/A
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: NA
D: If any checked, give details:	NONE

Migrant Workers:		
<p>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</p>		
A: Type of work undertaken by migrant workers:	There was no migrant employee at the facility	
B: Please give details about recruitment agencies for migrant workers:	Total number of (in country recruitment agencies) used: N/A Total number of (outside of local country) recruitment agencies used: N/A	
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes N/A <input type="checkbox"/> No Please describe finding:	Observations NA
D: Are Any migrant workers in skilled, technical, or management roles Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input type="checkbox"/> Yes N/A <input type="checkbox"/> No 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 No non-employee worker is available at the facility
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 checked="" type="checkbox"/> Other B1 – If other, please give details: NA
C: If any checked, give details:	NA

Agency Workers (if applicable) <i>(workers sourced from a local agent who are not directly paid by the site, but paid by the agency. Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)</i>	
A: Number of agencies used (average):	0 And names if available: N/A
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes There is no agency worker in the facility. <input type="checkbox"/> No
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes There is no agency worker in the facility. <input type="checkbox"/> No
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes There is no agency worker in the facility. <input type="checkbox"/> No Details N/A
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes There is no agency worker in the facility. <input type="checkbox"/> No Please describe: N/A

Contractors: <i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i>	
A: Any contractors on site?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If yes, how many contractors are present, please give details:
B: If Yes , 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 **Yes**, 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:

No external subcontracting was noted for any production processes.

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

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

Details:

Production records

Management interview

Employee interview

Details: NA

Non-compliance:

1. Description of non-compliance:

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

NONE

Local law and/or ETI requirement:

NONE

Recommended corrective action:

NONE

Objective evidence

observed:

NONE

Observation:

Description of observation: None observed

**Objective evidence
observed:**

Local law or ETI requirement: Not applicable Comments: Not applicable	Not applicable
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Good examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed: 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 Please describe: NA
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 If Yes , summarise details: NA
C: Number of sub-contractors/agents used:	NA
D: Is there a site policy on sub-contracting?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes , summarise details: NA
E: What checks are in place to ensure no child labour is being used and work is safe?	NA

Summary of homeworking – if applicable			
<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 Yes , summarise details: NA		
B: Number of homeworkers	B1: Male: NA	B2: Female: NA	Total: NA
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents NA		C1: If through agents, number of agents: NA

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

9: No Harsh or Inhumane Treatment is Allowed

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

ETI

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

Additional elements:

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 rd party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: There are published, anonymous and open channels available for reporting any violations of Labour standards. The employees can report to the legal authorities.
B: If Yes , are workers aware of these channels and have access? Please give details.	Workers are aware of these channels, they were posted on the notice board. There are published, anonymous and open channels available for reporting any violations of Labour standards.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	E- mail, hotline and suggestion boxes
D: Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Workers <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input type="checkbox"/> Other Details: There is a transparent and well-communicated e-mail and hotline system in place at the facility to enable external stakeholders to report to the company on Human Rights issues (grievances), without fear of reprisals towards the reporter.
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details N/A
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)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details N/A
G: Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No Please give details: There is a transparent and well-communicated e-mail and hotline system in place at the facility to enable external stakeholders to report to the company on Human Rights issues (grievances), without fear of reprisals towards the reporter. The grievance mechanism was communicated to the suppliers.

H: If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No please explain: NA
I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If no please give details: The disciplinary procedure does not allow for deductions from wages (fines) for disciplinary purposes.

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:

Disciplinary regulation was compliance with the legal regulations.

No disciplinary action was taken.

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.

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

Details:

Disciplinary procedure

Employee interviews

Management interview

Any other comments: None

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:
NONE

Local law and/or ETI requirement:

NONE

Recommended corrective action:

NONE

Objective evidence observed:

NONE

Observation:

Description of observation: None observed

Local law or ETI requirement: Not applicable

Comments: Not applicable

Objective evidence observed:

Not applicable

Good examples observed:

Description of Good Example (GE): None observed

Objective evidence observed:

Not applicable

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

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

Additional Elements

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

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

Current Systems and Evidence Examined

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

Current systems:

All workers were local.

No migrant worker was employed.

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

Details:
 Personnel files
 Labour contracts
 Employee interviews
 Management interview
 Any other comments: None

Non-compliance:

1. Description of non-compliance:

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

NONE

Local law and/or ETI requirement:

NONE

Recommended corrective action:

NONE

Objective evidence observed:

NONE

Observation:

Description of observation: None observed

Local law or ETI requirement: Not applicable

Comments: Not applicable

Objective evidence observed:

Not applicable

Good examples observed:

Description of Good Example (GE): None observed

Objective evidence observed:

Not applicable

10. Other issue areas 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:

The facility has written environmental policy stating compliance to all local regulations and international requirements.

There is environmental policies and procedures.

There is a responsible person on environmental issues.

All legally required reports and permits are available.

Training on environment is provided to employees.

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

Environmental documents, official documents, trainings, reports were reviewed.

Facility tour is conducted.

Details: None

Non-compliance:

1. Description of non-compliance:

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

NONE

Local law and/or ETI requirement:

NONE

Recommended corrective action:

NONE

Objective evidence observed:

NONE

Observation:

Description of observation: None observed

Local law or ETI requirement: Not applicable

Comments: Not applicable

Objective evidence observed:

Not applicable

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

Other findings

Other Findings Outside the Scope of the Code
none










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

Appendix 1

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

☒ Not Applicable please x

Photo Form

		
OUTVIEW	OUTVIEW	SUGGESTION BOX
		
FIRE EXTINGUISHER	FIRST AID KIT	DOCTOR ROOM
		
CUTTING SECTION	STEEL GLOVE IN CUTTING SECTION	NOTICE BOARD

		
SEWING AREA	PPE AVAILABLE ON SEWING MACHINE	IRONING SECTION
		
CHEMICALS HAVE SECONDARY CONTAINMENT	WASTE AREA	WARNING POSTED
		
DRINKING WATER	CHANGING ROOM	TOILET

		
<p>FIRE EQUIPMENT AND BATTERY LIGHT</p>	<p>LUNCH HALL</p>	<p>FIRE ALRM SYSTEM</p>
		
<p>ETI BASE CODE POSTED</p>	<p>PROTECTIVE SENSOR AVAILABLE ON CUTTING MACHINE</p>	<p>BATTERY LIGHT AND EMERGENCY SIGN AVAILABLE</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=riPsbE0PQ52ehCo3Inq5lw_3d_3d

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

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[Click here for Auditors:](#)

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