

Sedex Members Ethical Trade Audit Report





Audit Details								
Sedex Company Reference: (only available on Sedex System)	ZC: 404981970		Sedex Site Reference: (only available on Sedex System)		ZS: 405	5649692		
Business name (Company name):	ECOSE KONFEKSIYO	ECOSE KONFEKSIYON ITH. IHR. SAN. TIC. A. S						
Site name:	ECOSE KONFEKSIYO	N ITI	H. IHR. SAN. TI	C. A. S				
Site address: (Please include full address)	DINDOGRU MAH., PEHLIVANKOY YOLUCIMENLIDERE MEVKII, L BLOK, NO: BABAESKI / KIRKLAR				TURKE	Y		
Site contact and job title:	Mr Muammer Sert (CSR	Responsible)				
Site phone:	00905459218804		Site e-mail:		kalite	guvence@ecosetekstil.com.tr		
SMETA Audit Pillars:	∑ Labour Standards	Saf	Health & Dety (plus Environment 2-pillar pillar		ent 4-	☐ Business Ethics		
Date of Audit:	24 November 2021							

Audit Company Name & Logo:

BUREAU VERITAS CPS



Report Owner (payer):

ECOSE KONFEKSIYON ITH. IHR. SAN. TIC. A. S

Audit Conducted By								
Affiliate Audit Company	\boxtimes	Purchaser		Retailer				
Brand owner		NGO		Trade Union				
Multi– stakeholder			Combined Audit (select all that appl	у)			

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 company: Bureau Veritas CPS Report reference: 10213211500 Date: 24.11.2021 Sedexglobal.com



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): This audit includes elements beyond the scope of a Social Compliance Audit as defined by the APSCA Competency Framework. The association of the auditor's APSCA number with this report is limited to those elements outlined in the APSCA Competency Framework. APSCA makes no representations with respect to the auditor's competency to professionally evaluate compliance with any other audit elements.

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

Lead auditor: Cagla Baskin APSCA number: RA 21700076

Lead auditor APSCA status: RA

Team auditor: Ozgun Sari APSCA number: RA 21704946

Interviewers: Cagla Baskin, Ozgun Sari APSCA number: RA 21700076, RA 21704946

Report writer: Ozgun Sarı Report reviewer: Hester Wu

Date of declaration: November 24, 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

to the	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		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)				d the nu Jes by I		Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
	e audit report, hyperlinks are retained.	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A	Universal Rights covering UNGP						0	0	None
ОВ	Management systems and code implementation					0	1	0	 Obs: It was observed that there was a printed in A3 color, all employees can see it poster in the production area of the company.
1.	Freely chosen Employment					0	0	0	None
2	Freedom of Association					0	0	0	None
3	Safety and Hygienic Conditions				\boxtimes	2	0	0	 The Employment health examination of 30 employees was not seen on the day of the audit Fire drills were held on 06.11.2020 and 09.06.2021. The fire drill should be repeated every 6 months.
4	Child Labour					0	0	0	• None
5	Living Wages and Benefits	\boxtimes	\boxtimes			1	0	1	 Factory did not have a crèche or crèche contract while the factory had more than 150 (232) female workers.

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							 GE: The Company provides monthly meal cards and transportation were freely provide to employee.
6	Working Hours			0	0	0	• None
7	<u>Discrimination</u>			0	0	0	• None
8	Regular Employment			0	0	0	• None
8A	Sub-Contracting and Homeworking			0	0	0	• None
9	<u>Harsh or Inhumane Treatment</u>			0	0	0	• None
10A	Entitlement to Work			0	0	0	• None
10B2	Environment 2-Pillar			5	0	0	 An industrial waste management plan was created in the company, but ministry approval was not seen on the audit day. The company does not have a license to search and use well water. The company has an Environmental permit; The environmental permit opinion has not been updated after the printing process was added. There is no waste storage area in the company. The waste declaration and the annex5 packaging declaration were not seen on the audit day.
10B4	Environment 4-Pillar			N/A	N/A	N/A	• N/A



10C	Business Ethics					N/A	N/A	N/A	• N/A	
Gene	General observations and summary of the site:									
TherTherTherTherTherTherTher26 v	company is a manufacture were totally 359 employoungest worker was 17 ye was no migrant worker in ewas no trade union in the were 4 worker represence were male and female workers were selected for pecific compliant was ra	yees including 36 adm years old. In the facility. In the facility. The company. Intatives in the compare workers in managem interviews 6 individual	ninistrativ ny. eent and I and 4 g	ve collared ei among supe group interviev	ervisors. ws (5 work	ers in a ç	. ,		nducted.	
26 6	26 employees' time and payment records were reviewed for October 2021, May 2021, and January 2021									

*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.

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• All employees were paid at legal minimum wage.

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Site Details

Site Details							
A: Company Name:	ECOSE KONFEKSIYO	n ith. ihr. s <i>a</i>	AN. TIC. A.	S			
B: Site name:	ECOSE KONFEKSIYON ITH. IHR. SAN. TIC. A. S						
C: GPS location: (If available)	MAH., PEHLIVANKOY			41°26'39.0"N e: 27°02'23.8"E			
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Business opening an	Business opening and operating permit number : 2018/06					
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Cutting, sewing printing, packing, ironing						
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	Production Building no 1	Description	n	Remark, if any			
	Floor 1	Cutting, Sewing Printing, Packing, Ironing, Offices, Infirmary, Inspection room, shipping section, Lunch Hall, Locker Room, Warehouse		None			
	Is this a shared building?	No	<u> </u>	None			
	Production Building no 2	Description	on	Remark, if any			
	Floor 1 Is this a shared	Warehous	se	Under Construction			
	building?	No		None			
	ECOSE KONFEKSIYON ITH. IHR. SAN. TIC. A. S is located in Babaeski in 2018 .The company occupied two 1-storey buildings. Total area of the facility is 4500 sqm .It is not a shared building as find on below.						
	There were totally 359 employees available at site which including 36 non production (18 males, 18 females) employees and 323 production employees (109 male and 214 female) also 3 trainee employees available at site. The youngest employee is 17 years old.						

Time record system: Electronic finger scanning system Regular working hour for all employees is Monday to Friday from 08:00 to 18:30 with 40 min lunch break at 12:15 and 15 min teak break at 09:30, 17:30, 10 min tea break at 11:30 15:30, and 16:00. Saturday and Sunday are weekly rest days. Regular working hour for Security Staff: 08:00 to 16:00 /16:00 to 24:00 / 00:00 to 08:00 from Monday to Saturday with 30 min break. Regular working hour for young worker: 08:00 to 18:30 with 2 hours lunch break at 12:15 and 15 min teak break at 09:30 and 17:30, 10 min tea break at 11:30 15:30, and 16:00. 7 hours 30 minutes / Day Trainees work 3 days a week. they are at school the rest of the week Payment Day: 5-10st of following month by bank transfer For below, please add any extra rows if appropriate. F1: Visible structural integrity issues (large cracks) observed? Yes Yes ⊠ No F2: Please give details: F3: Does the site have a structural engineer evaluation? Пио F4: Please give details: The company has a structural engineer evaluation report. G: Site function: Agent $oxed{\boxtimes}$ Factory Processing/Manufacturer Finished Product Supplier Grower Homeworker Labour Provider Pack House Primary Producer Service Provider Sub-Contractor H: Month(s) of peak season: There was no peak season in last 12 months. (if applicable) I: Process overview: There were Cutting, sewing printing, packing, ironing processes (Include products being produced, main on the site. operations, number of production lines, main equipment used) 148 Overlock Machine 102 Sewing Machine



50 Cover Stitch Machine 20 Ironing J: What form of worker representation / Union (name) union is there on site? Other (specify) □ None □ Yes K: Is there any night production work at ⊠ No the site? L: Are there any on site provided worker Yes Yes ⊠ No accommodation buildings e.g. dormitories L1: If yes, approx. % of workers in on site accommodation M: Are there any off site provided ☐ Yes ⊠ No worker accommodation buildings M1: If yes, approx. % of workers N: Were all site-provided ☐ Yes ⊠ No accommodation buildings included in this audit N1: If no, please give details



	Audit Parameters								
A: Time in and time out	A1: Day 1 Tir A2: Day 1 Tir out:18:30			/ 2 Time in: / 2 Time out:		Day 3 Time in: Day 3 Time out:			
B: Number of auditor days used:	2 auditor x 1	day							
C: Audit type:	Partial Fo								
D: Was the audit announced?	🗵 Semi – ar	☐ Announced ☐ Semi – announced: Window detail: 1st between 30th November ☐ Unannounced							
E: Was the Sedex SAQ available for review?	Yes No E1: If No, why not?								
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	Yes No If Yes , please capture detail in appropriate audit by clause								
G: Who signed and agreed CAPR (Name and job title)	Mr Muamme	er Sert (CSR F	?esponsib	ole)					
H: Is further information available (If yes, please contact audit company for details)	☐ Yes ☐ No								
I: Previous audit date:	N/A								
J: Previous audit type:	N/A								
K: Were any previous audits reviewed for this audit	☐ Yes ☐ No ☐ N/A								
Audit attendance		Manageme	nt	Worker Represer	ntative T	es			
		Senior	nt	Worker Committ	ee	Union			



A: Present at the opening meeting?	⊠ Yes	□No	⊠ Yes	□No	Yes	⊠ No
B: Present at the audit?	⊠ Yes	□No	⊠ Yes	□No	Yes	⊠ No
C: Present at the closing meeting?	⊠ Yes	□No	⊠ Yes	□No	Yes	⊠ No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	None					
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	No union was established in the facility					

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Worker Analysis

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

Worker Analysis									
		Local			Migrant*		Total		
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	1016	
Worker numbers – Male	109	0	0	0	0	0	0	109	
Worker numbers – female	214	0	0	0	0	0	0	214	
Total	323	0	0	0	0	0	0	323	
Number of Workers interviewed – male	7	0	0	0	0	0	0	7	
Number of Workers interviewed – female	19	0	0	0	0	0	0	19	
Total – interviewed sample size	26	0	0	0	0	0	0	26	



A: Nationality of Management	Turkish	
B: Please list the nationalities of all workers, with the three most common nationalities listed first. Please add more nationalities as applicable to site. Add more rows if required.	Nationalities: B1: Nationality 1: Turkish B2: Nationality 2: B3: Nationality 3:	Was the list completed during peak season? Yes No If no, please describe how this may vary during peak periods: N/A. There was no peak season.
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1100 C1: approx % total workforce: Nationality 2 C2: approx % total workforce: Nationality 3	
D: Worker remuneration (management information)	D:% workers on piece rate D1:100% hourly paid workers D2:% salaried workers Payment cycle: D3:% daily paid D4:% weekly paid D5:100% monthly paid D6:% other D7: If other, please give details	





Worker Interview Summary A: Were workers aware of the audit? Yes No B: Were workers aware of the code? X Yes No C: Number of group interviews: 4 group (5 worker in a group) (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) D: Number of individual interviews D1: Male: 3 D2: Female: 3 (Please see SMETA Best Practice Guidance and Measurement Criteria) X Yes E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency No workers, Workers employed by service providers such as security and catering staff as well as workers supplied by If no, please give details other contractors. Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment X Yes F: Interviews were done in private and the confidentiality of the interview process was communicated to the ПΝο workers? M Favourable G: In general, what was the attitude of the workers Non-favourable towards their workplace? Indifferent H: What was the most common worker complaint? None I: What did the workers like the most about working at this Payment on time, friendly environment site? J: Any additional comment(s) regarding interviews: None K: Attitude of workers to hours worked: None L. Is there any worker survey information available? Yes \bowtie No L1: If yes, please give details: 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

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There were totally 359 employees including 36 white collared employees onsite. There was no migrant employee in the company.

26 workers were selected for interviews randomly or according to their age, physical appearance, health care reports, sections or personal file records. 26 interviews were conducted confidentially in an isolated meeting room. They were asked about the workplace and working conditions.

Interviewed workers informed their pleasure about free lunch, friendship and social insurance provided by the facility. No negative feedback was raised.

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

Sampled worker representatives stated that workers have no complaints about their social benefits and working environment. No other compliant was raised.

O: Attitude of managers:

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

Upon arrival auditors were greeted by Mr Muammer Sert (CSR Responsible).

The company management was kind, cooperative, polite and transparent during the entire 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:

Human rights policy of the company was established.

Ms. Aysun Asar HR Responsible was assigned for implementing standards concerning human rights. Confidential grievance system in place in order to raise the complaints regarding human rights issues.

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

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

Any other comments: None

ase give details: Human rights policy of the ny was reviewed.

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B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	☐ Yes☐ NoPlease give details:Name: Ms. Aysun AsarJob title: HR Responsible		
C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	Yes No C1: Please give details: Confidential grievance system in place in order to raise the complaints regarding human rights issues		
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rightscompatible, a source of continuous learning and based on stakeholder engagement)	∑ Yes ☐ No D1: If no, please give details		
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	Yes No E1: Please give details: All documents of employees (such as ID copies etc.) were kept under controlled conditions by the accountant staff of the company. The company respects data privacy.		
Findings: NONE			
Finding: Observation Company NC		Objective evidence observed:	
None observed.		N/A	
Good examples observed: NONE			
Description of Good Example (GE):		Objective Evidence Observed:	
None observed.		N/A	

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 26 %	A2: This year: 2021 22 %
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 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	11%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 2020 1,2%	C2: This year: 2021 0,07 %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	0	
E: Are accidents recorded?	Yes No E1: Please describe: Accident records were reviewed during audit.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total worke rs]	F1: Last year: 2020 Number: 0	F2: This year: 2021 Number: 0
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	0	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 2020 1,43	H2: This year: 2021 0,28
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 0_% workers	I2: 12 months 0_% workers

J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:

J1: 6 months

__0_% workers
__0_% workers

0B: Management system and Code Implementation

(Click here to return to summary of findings)

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

Current Systems and Evidence Examined

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

Current systems: Company has workplace opening and operating license.

ETI Base Code was posted on notice board.

Company has appointed a senior member of management who is responsible for compliance with this Code.

Company has communicated this code to all employees and suppliers.

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

Details: Confirmed with management interview, document review

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: It was confirmed with management interview.	
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: Social compliance policies (such as prohibiting forced labour, child labour, discrimination, harassment and abuse etc.) of the company were reviewed.	
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	The policies were posted on notice board.	

D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	∑ Yes ☐ No D1: Please give details: Training records were available.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	Yes No E1: Please give details: Training records were reviewed. All employees were informed regarding social compliance policies at the beginning of recruitment and periodically.
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).	Yes No F1: Please give details: The Company was not certified to any internationally recognised system.
G: Is there a Human Resources manager/department? If Yes, please detail.	Yes No G1: Please give details: The Company has well designed HR department.
H: Is there a senior person / manager responsible for implementation of the code	Yes No H1: Please give details: Mr Muammer Sert - CSR Responsible was responsible for implementation of the code.
I: Is there a policy to ensure all worker information is confidential?	Yes No I1: Please give details: All documents of employees (such as ID copies etc.) were kept under controlled conditions by the accountant staff of the company. The company respects data privacy.
J: Is there an effective procedure to ensure confidential information is kept confidential?	∑ Yes ☐ No J1: Please give details: All documents of employees (such as ID copies etc.) were kept under controlled conditions by the accountant staff of the company. The company respects data privacy.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	Yes No K1: Please give details: Corrective and preventative action process was in place.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	Yes No L1Please give details: Internal assessments were conducted to evaluate policy and procedure effectiveness.

M: Does the facility have a policy/code which require labour standards of its own suppliers?	Yes No M1: Please give details: The Company sends a copy of ETI Base Code to its suppliers.
Land rig	hts
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	Yes No N1: Please give details: The Company has opening and operating permit.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	Yes No O1: Please give details: Owner of the company is responsible to conduct legal due diligence to recognise and apply national laws and practices relating to land title.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	Yes No P1: If yes, how does the company obtain FPIC: The Company building was established on a land which has the legal land title belongs to the owner. The company provided the structure permit as well.
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	 ∑ Yes ☐ No Q1: Please give details: The previous owner of the land was paid by the current land owner. The current land owner is also the owner of the building.
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	Yes No R1: Please give details: N/A
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	Yes No S1: Please give details: The land title and workplace opening & operating permit were cover all perimeters of the factory site

Non-compliance: NONE



1. Description of non-compliance: NC against ETI/Additional Elements NC against customer code: None Observed None Observed	Objective evidence observed:		
Observation: 1			
Description of observation: It was observed that there was a printed in A3 color, all employees can see it poster in the production area of the company.	Objective evidence observed: Site Tour, Worker Interview		
Local law or ETI requirement: Client requirements			
Comments: None			
Good Examples observed: NONE			

Description of Good Example (GE):

None Observed

Objective evidence

observed:

N/A

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 is freely chosen.

No guards present during working hours.

Movement of employees at the facility is not prohibited or limited.

Employees have free access to toilets and drinkable water.

Overtimes are always performed on voluntary basis.

The factory does not require deposit or withhold employees' ID cards.

The factory does not limit the employees' freedom.

There is no forced, bonded or involuntary prison labour.

Employees are free to leave their employer after reasonable notice.

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

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

Any other comments: None

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



E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement? Yes No No Not applicable E1: Please describe finding:			
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	☐ Yes ☐ No F1: Please describe finding:		
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	Yes No Not applicable G1: If yes, please give details and category of workers affected: The company sends ETI Base Code to its supply chain.		
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour? Yes No No H1: Please describe finding: The Company were visited occasionally in order to prevent forced / trafficked labour issues			
	Non–compliance: NONE		
1. Description of non–compliance:		Objective evidence observed:	
☐ NC against ETI ☐ NC against Local Law: ☐ NC against customer code:		N/A	
None Observed			
	Observation: NONE	<u> </u>	
Description of observation:		Objective evidence observed:	
None Observed		N/A	
Good Examples observed: NONE			
Description of Good Example (GE):		Objective evidence observed:	
None Observed		N/A	

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 were complaint boxes onsite. Open door policy effectively works.

There were 4 freely elected worker representative.

Worker representative election was performed on 22.02.2021

Employees feel free to join trade union as per interviews.

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

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

Any other comments: None

A: What form of worker representation/union is there on site?	☐ Union (name) ☐ Worker Committee (4 Worker Representatives) ☐ Other (compliant boxes) ☐ None
B: Is it a legal requirement to have a union?	☐ Yes ☑ No
C: Is it a legal requirement to have a worker's committee?	☐ Yes ☑ No
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	Yes No D1: Please give details: Open door policy and compliant box systems were in place to ensure effective worker/management communication.



D2: Is there evidence of free elections? П № E: Does the supplier provide Yes П№ adequate facilities to allow the Union or committee to conduct E1: Please give details: It was confirmed with worker representative related business? interview that worker representatives are free to perform meetings with employees. Adequate facilities were provided by the management F1: Is there evidence of free elections? F: Name of union and union There was no representative, if applicable: unionisation activity in ☐ Yes ☐ No ☒ N/A the company. G: If there is no union, is there a There were 4 freely G1: Is there evidence of free elections? parallel means of consultation with elected worker workers e.g. worker committees? representatives onsite. H: Are all workers aware of who their representatives are? I: Were worker representatives freely 11: Date of last election: 10.09.2021 elected? J: Do workers know what topics can be raised with their representatives? K: Were worker representatives/union If Yes, please state how many: 2 representatives interviewed? L: Please describe any evidence The last meeting between worker representative and that union/worker's committee is management was perform. Grievances of employees were effective? discussed. Specify date of last meeting; topics covered; how minutes were communicated etc. ☐ Yes ☐ No M: Are any workers covered by Collective Bargaining Agreement (CBA)? M1: NA_% workers covered by M1: NA_% workers covered by If Yes, what percentage by trade Union/worker representation Union CBA Union CBA M3: If Yes, does the Collective Yes □ No (N/A) Bargaining Agreement (CBA) include rates of pay?

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Non-compliance: NONE			
Description of non-compliance: NC against ETI NC against Local Law NC against customer code: None Observed	Objective evidence observed:		
Observation: NONE			
Description of observation: None observed.	Objective evidence observed:		
Good Examples observed: NONE			
Description of Good Example (GE): None observed.	Objective evidence observed:		

3: Working Conditions are Safe and Hygienic

(Click here to return to summary of findings) (Click here to return to Key Information)

FTI

- 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:

There were policy regarding healthy and safety in the company.

The company has job site doctor and H&S Specialists.

Periodical health checks of the workers were available.

The health and safety committee meeting was performed.

The periodical inspection of compressor was performed.

The periodical inspection of fire system was performed.

The electricity grounding test was performed.

The electrical installation test was performed.

The drinking water analysis was performed.

The occupational health and safety training was performed.

The fire fighting and evacuation drill was performed.

Firefighting equipment was controlled.

Job related accidents were recorded.

Hygiene training certificates were obtained for all employees who contact with food.

Emergency preparedness plan was conducted in March 2020.

Risk analysis was conducted in March 2020.

MSDS of chemicals used in facility were available in production and usage areas.

Indoor measurements (noise, illumination, dust, VOC, thermal comfort) were conducted

The Company carried out a Covid-19 risk assessment. All employees were given training on Covid-19 measures and social distance. They started to make their break outs partially. In order to pay attention to social distance in the Lunch hall, the number of chairs at the tables has been reduced (2 chairs use every tables). Every visitor's temperature was measured at the entrance and they inquired about the covid-19 disease and vaccine from the health registration system.

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



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

Fire alarm system and fire hose were tested during facility tour

Any other comments: None

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	Yes No A1: Please give details: The Company has Health & Safety Procedures and these procedures share with employees via training.
B: Are the policies included in workers' manuals?	Yes No B1: Please give details: The Company has a detailed Health & Safety Procedures and this procedures are explained in Health & Safety trainings to employees.
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	Yes No C1: Please give details:
D: Are visitors to the site informed on H&S and provided with personal protective equipment	 ∑ Yes ☐ No D1: Please give details: Visitors were informed on H&S and provided required personal protective equipment.
E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.	 ∑ Yes ☐ No E1: Please give details: There was an infirmary in the company which meets legal requirements.
F: Is there a doctor or nurse on site or there is easy access to first aider/trained medical aid?	Yes No F1: Please give details: There were job site doctor, nurse and first aid certificated workers on site.
G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	 ∑ Yes ☐ No G1: Please give details: The company works with professional transportation company.
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	Yes No N/A H1: Please give details: There was no dormitory.



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?	X Yes No No I1: Please give details: Risk assessment 2020 and reviewed periodically by an	
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	S Yes No J1: Please give details: There was no environmental permit.	
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	Xes No K1: Please give details: There was no be company	panned chemical in the
	Non–compliance: 2	
1. Description of non-compliance: NC against ETI NC against Lacode: Based on satisfactory evidence; The empleyees was not seen on the day of the		Objective evidence observed: Document Review, Worker Interview
Local law and/or ETI requirement: Health and Safety Law #6631, Article: 15/a: Employer shall supplied health checks of the personnel according to the job. 15/b: It is mandatory that health checks shall be done 1) On the employment 2) Changing of job 3) After turning back to the work because of work accident, occupational disease if they request periodically		
Recommended corrective action: It is recadopt practices and controls to ensure the regular physical examinations.		
2. Description of non-compliance: NC against ETI NC against Lc code: Based on satisfactory evidence; fire drills 109.06.2021. At Tesco's request, the fire drill	Objective evidence observed: Document Review, Worker ınterview	
Local law and/or ETI requirement: 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.		
The fire drill should be repeated every 6 months.		
Recommended corrective action: It is recommended that management adopt practices and controls to ensure that; fire drill should be repeated every 6 months.		



Observation: NONE	
Description of observation:	Objective evidence observed:
Non Observed	N/A

Good Examples observed: NONE	
Description of Good Example (GE):	Objective Evidence Observed:
Non Observed	N/A

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: Current systems: There was 4 young worker in company. Youngest worker was 17 years old.

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

Details: Personnel files of workers.

Any other comments: None

A: Legal age of employment:	Completed 15
B: Age of youngest worker found:	17 years old
C: Are there children present on the work floor but not working at the time of audit?	☐ Yes ☑ No
D: % of under 18's at this site (of total workers)	1,11 %
E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	Yes No N/A E1: If yes, give details



Description of non-compliance: NC against ETI	Objective evidence observed: N/A
Observation: NONE	
Description of observation: None observed.	Objective evidence observed:
Good Examples observed: NONE	
Description of Good Example (GE): None observed.	Objective Evidence Observed: N/A

5: Living Wages are Paid

(Click here to return to summary of findings)
(Click here to return to Key information)

FTI

- 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:

Wages are paid between 5th - 10th of following month by bank transfer.

All employees are given a detailed pay slip.

All employees were covered with social security.

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

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

Any other comments: None

Non–compliance: NONE	
Description of non-compliance: ☐ NC against ETI	Objective evidence observed: Document Review, Management Interview, Worker Interview
Local law and/or ETI requirement: Regulation on Working Conditions of Pregnant or Nursing Women, Breastfeeding Rooms and Child Care Dormitories Official Gazette Date: 16.08.2013 Official Gazette Number: 28737 Obligation to open a room and dormitory ARTICLE 13 - (1) Regardless of their age and marital status, in workplaces with 100-150 female employees, a breastfeeding person that meets the conditions specified in ANNEX-IV by the employer for breastfeeding employees to breastfeed their children, separate from their workplaces and at a maximum	

distance of 250 meters from the workplace. The establishment of the room is mandatory.

- (2) Regardless of their age and marital status, in workplaces with more than 150 female employees, the employer shall comply with the conditions specified in Annex-IV, separate from the workplace and close to the workplace, for the release and care of children aged 0-6 years and for breastfeeding children of nursing employees It is compulsory to establish a dormitory that carries it. If the dormitory is more than 250 meters from the workplace, the employer is obliged to provide vehicles.
- (3) Employers may establish joint rooms and dormitories, as well as fulfill their obligation to open rooms and dormitories through agreements with dormitories authorized by public institutions.

Recommended corrective action: It is recommended that management adopt practices and controls to ensure that Factory shall have a crèche or creche agreement.

Observation: NONE	
Objective evidence observed: None observed	Objective evidence observed:

Description of Good Example (GE): The company provides monthly meal cards and transportation were freely provide to employee. Objective Evidence Observed: Worker Interviews, Management Declaration, 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 for adult workers. 40 hours/week and 8 hours/day for the workers between 15 – 18 years old.	A1: 45 hours minutes/week	A2: □ Yes ☑ No

	7 hours and 30 minutes/day for pregnant workers 7 hours and 30 minutes/day for night shift		
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 270 hours per year	B1: 214 hours / year	B2: ☐ Yes ☒ No
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 3.577,50 TL (Gross) 2.825,90 TL (Net) Since January 2020	C1: 2.825,90 TL (Net)	C2: Yes No
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 150% of hourly wage for each working practice duration over 45 hours/week. (This is the only overtime wage premium defined in Turkish labour law)	D1: 150% of hourly wage	D2: ☐ Yes ☑ No
	s analysis: urn to Key Information	1	
A: Were accurate records shown at the first request?			

Wages analysis: (Click here to return to Key Information)			
A: Were accurate records shown at the first request?	∑ Yes □ No		
A1: If No , why not?	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)	26 employees' time and payment records were reviewed for October 2021, May 2021 and January 2021 respectively.		
C: Are there different legal minimum wage grades? If Yes , please specify all.	☐ Yes ☑ No	C1: If Yes , please give details:	
D: If there are different legal minimum grades, are all workers graded and paid correctly?	☐ Yes ☐ No ☑ N/A	D1: If No , please give details:	

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E: For the lowest paid production ☐ Below legal E1: Lowest actual wages found: 2.825,90 TL workers, are wages paid for min (Net) ⊠ Meet standard/contracted hours Above (excluding overtime) below or above the legal minimum? F: Please indicate the breakdown of _% of workforce earning under minimum wage workforce per earnings: F2: 20 % of workforce earning minimum wage F3: _80_% of workforce earning above minimum wage G: Bonus Scheme found: Bonus Scheme found: There was no Bonus Scheme Please specify details: H: What deductions are required by Social insurance, tax, unemployment benefit law e.g. social insurance? Please state all types: I: Have these deductions been Yes 11: Please list all 1.Social Insurance made? □ No deductions that 2.Tax have been made. 3.Unemployement benefit Please describe: N/A 12: Please list all 1. None deductions that have not been Please describe: N/A made. J: Were appropriate records Пио available to verify hours of work and wages? K: Were any inconsistencies found? Yes K1: Type (if yes describe nature) \square No Poor record keeping Isolated incident Repeated occurrence: L: Do records reflect all time worked? Yes (For instance, are workers asked to □No attend meetings before or after work L1: Please give details: All records were kept regularly. but not paid for their time) ☐ Yes M: Is there a defined living wage: ⊠ No This is <u>not normally</u> minimum legal wage. If answered yes, please state M1: Please specify amount/time: amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.



M2: If yes, what was the calculation method used.	☐ISEAL/Anker Benchmarks ☐Asia Floor Wage ☐Figures provided by Unions ☐Living Wage Foundation UK ☐Fair Wear Wage Ladder ☐Fairtrade Foundation Other – please give details: N/A
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	Yes No N1: Please give details: Minimum wages are updated at the beginning of each year by the Ministry of Labour and Social Security. There is no basic need wage implementation in the company to be updated or reviewed.
O: Are workers paid in a timely manner in line with local law?	Yes No
P: Is there evidence that equal rates are being paid for equal work:	Yes No P1: Please give details: It was confirmed with worker interviews and document review.
Q: How are workers paid:	☐ Cash ☐ Cheque ☐ Bank Transfer ☐ Other Q1: If other, please explain:

6: Working Hours are not Excessive

(Click here to return to summary of findings) (Click here to return to Key Information)

FTI

- 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 <u>all</u> 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:

Regular working hour for all employees is Monday to Friday at 08:00 to 18:30 with 40 min lunch break at 12:15 and 15 min teak break at 09:30, 17:30, 10 min tea break at 11:30 15:30, and 16:00. Saturday and Sunday are weekly rest days.

Regular working hour for Security Staff: 08:00 to 16:00 /16:00 to 24:00 / 00:00 to 08:00 Monday to Saturday with 30 min break.

Regular working hour for young worker: 08:00 to 18:30 with 2 hours lunch break at 12:15 and 15 min teak break at 09:30 and 17:30, 10 min tea break at 11:30 15:30, and 16:00. 7 hours 30 minutes / Day Trainees work 3 days a week, they are at school the rest of the week

Time record system: Electronic finger scanning system



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

Details: 26 employees' time and payment records were reviewed for October 2021, May 2021 and January 2021

Any other comments: None

	Non–compliance: NONE				
1. Description of non–com NC against ETI code: None observed.	ppliance: NC against Local Law NC against customer	Objective evidence observed:			
	Observation: NONE				
Description of observation	:	Objective evidence observed:			
None observed.		N/A			
	Const Francisco de NONE				
	Good Examples observed: NONE	1			
Description of Good Exam	nple (GE):	Objective Evidence Observed:			
None observed.		N/A			
	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 Electronic finger scanning system				



B: Is sample size same as in wages section?	∑ Yes □ No B1: If no, please (give detail	S		
C: Are standard/contracted working hours defined in all contracts/employment agreements?	∑ Yes □ 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	☐ Yes ☑ No	D1: If YES	, please complete	e as appropriate:	
agreements used?		0 hrs	Part time	☐ Variable hrs	Other
		If "Other"	', Please define:		
		N/A			
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	☐ Yes ☑ No	E1: If yes , please detail hours, %, types of workers affected and frequency Please give details:			
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: 1 in 7 days 2 in 14 days No If 'No', please explain:	F3: Is this allowed by local law? Yes No			
	Maximum numbe	er of days	worked without a	day off (in sample)	:
	6				
Standard/Contracted Ho	ours worked				
G: Were standard working hours over 48	☐ Yes ⊠ No	G1: If yes	, $\%$ of workers $\&$ fro	equency:	
hours per week found?	⊠ I40	N/A			
	Yes	H1: If yes	, please give deta	ils:	

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H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	⊠ No	
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: October 2021 Day: 9 hours (Sat Week: 14 hours Month: 26 hours January 2021 Day: 2 hours Week: 6 hours Month: 16 hours May 2021 Day: 8 hours (Sat Week: 13 hours Month: 30 hours	urday)
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	☐ Yes ☑ No	
K: Approximate percentage of total workers on highest overtime hours:	N/A%	
L: Is overtime voluntary?	Yes No Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: According to employee contracts and employee interviews, Overtime was voluntary
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	Yes No 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% of hourly wage for each working practice duration over 45 hours/week
N: Is overtime paid at a premium?	⊠ Yes □ No	N1: If yes, please describe % of workers & frequency: 150% of hourly wage for each working practice duration over 45 hours/week

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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	 No □ Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) □ Collective Bargaining agreements □ Other
where relevant.	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other
	N/A
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please	Overtime is voluntary Onsite Collective bargaining allows 60+ hours/week Safeguards are in place to protect worker's health and safety Site can demonstrate exceptional circumstances Other reasons (please specify)
complete the boxes where relevant.	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:
	N/A
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	☐ Yes ☐ No Q1: If yes, please give details:
R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	☐ Yes ☐ No

7: No Discrimination is Practiced

(Click here to return to summary of findings)

ETI

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

Current Systems and Evidence Examined

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

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

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

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

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: 50 % A2: Female: 50 %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	18
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	Hiring Compensation Access to training Promotion Termination or retirement No evidence of discrimination found C1: Please give details:

D		D	
Protess	ıonaı	Deve	lopment

A: What type of training and development are available for workers?	All workers were given occupational health and safety and quality trainings periodically.		
B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	∑ Yes □ No		
	If no, please give details:		
	Non–compliance: NONE		
Description of non–compliance:		Objective evidence observed:	
☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:		N/A	
None observed.			
	Observation: NONE		
Description of observation:		Objective evidence observed:	
None observed.		N/A	
Good Examples observed: NONE			
Description of Good Example (GE):		Objective Evidence Observed:	
None observed.		N/A	

8: Regular Employment Is Provided

(Click here to return to summary of findings)
(Click here to return to Key Information)

ETI

- 8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- 8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour–only contracting, sub–contracting, or home–working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed–term contracts of employment.

Additional Elements: Responsible Recruitment

- 8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.
- 8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.
- 8.5 Employment agencies must only supply workers registered with them.
- 8.6 Workers pay no recruitment fee at any stage of the recruitment process.
- 8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.

Current Systems and Evidence Examined

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

Current systems: All workers have their well-prepared personal files and signed labour contracts.

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

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

Any other comments: None

Non-compliance: NONE	
1. Description of non–compliance:	Objective evidence
☐ NC against ETI ☐ NC against Local Law ☐ NC against customer	observed:
code:	N/A
None observed.	



Observation: NONE		
Description of observation: None observed.	Objective evidence observed:	

Good Examples observed: NONE	
	Objective Evidence Observed:
None observed.	N/A

Responsible Recruitment

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



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

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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

another in-country region to seek and engage in a remunerated activity				
A: Type of work undertaken by migrant workers:	There was no migrant worker			
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: B2: Total number of (outside of local country) recruitment agencies used:			
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	Yes No N/A C1: Please describe finding:	C2: Observations: N/A		
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)	Yes No N/A D1: If yes, number and example of roles:			



NON-EMPLOYEE WORKERS

Recruitment Fees:			
A: Are there any fees?	☐ Yes ☒ No		
B: If yes, check all that apply:	Serv App Reca Place Adm Skills Cert Meca Pass Worl Birth Any	cruitment / hiring fees vice fees commendation fees statifications dical screenings sports/ID's rk / resident permits coertificates coe clearance fees r transportation and lodging costs after employment offer r transport costs between work place and home r relocation costs after commencement of employment w hire training / orientation fees dical exam fees cost bonds or other deposits r other non-monetary assets coefficients continued to the commencement continued to the commencement continued to the c	
C: If any checked, give details:	N/A		
		Agency Workers (if applicable) who are not directly paid by the site, but paid by the agency, Usually the and the wages of the individual workers are paid by the agency.)	
A: Number of agencies used (average):	k	A1: Names if available: There was no agency worker.	
B: Were agency workers' age / pay / hours included within the scope of this audit?		☐ Yes ☐ No N/A	
C: Were sufficient documents for agency workers available for review?		☐ Yes ☐ No N/A	
D: Is there a legal contract / agreement with all agencie		☐ Yes ☐ No N/A	



	D1: Please give details:
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	Yes No N/A E1: Please give details:
	Contractors: erally individuals who supply several workers to a site. Usually the contractors e workers are paid by the contractor. Common terms include, gang bosses, labor provider,
A: Any contractors on site?	Yes No A1: If yes, how many contractors are present, please give details:
B: If Yes , how many workers supplied by contractors?	N/A
C: Do all contractor workers understand their terms of employment?	Yes No N/A C1: Please describe finding:

N/A

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: The Company has not used sub-contractor for any processes.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate): Site tour (Calculation on total production and estimated capacity), materials in/out records, management interview, worker interviews

capacity), materials in/out records, management interview, worker interviews				
Details: None				
Non-compliance: None				
1. Description of non-compliance: NC against ETI/Additional Elements NC against customer code: None observed.	Objective evidence observed: N/A			
Observation: None				
Description of observation: None observed.	Objective evidence observed: N/A			
Good Examples observed: None				
Description of Good Example (GE):	Objective Evidence Observed:			



None observed.			١	N/A
Sum	Summary of sub-contracting – if applicable Not Applicable please x			
A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting	Yes No A1: Please describe:			
B: If sub–contractors are used, is there evidence this has been agreed with the main client?	Yes No B1: If Yes , summarise de	etails:		
C: Number of sub- contractors/agents used:				
D: Is there a site policy on sub- contracting?	Yes No D1: If Yes , summarise d	etails:		
E: What checks are in place to ensure no child labour is being used and work is safe?				
Su	mmary of homeworking Not Applicable p		le	
A: If homeworking is being used, is there evidence this has been agreed with the main client?	Yes No A1: If Yes , summarise d	etails:		
B: Number of homeworkers	B1: Male:	B2: Female	:	Total:
C: Are homeworkers employed direct or through agents?	☐ Directly ☐ Through Agents		C1: If through agents, number of agents:	
D: Is there a site policy on homeworking?	Yes No			
E: How does the site ensure worker hours and pay meet local laws for homeworkers?				
F: What processes are carried out by homeworkers?				

G: Do any contracts exist for homeworkers?	☐ Yes ☐ No
	G1: Please give details:
H: Are full records of homeworkers available at the site?	☐ Yes ☐ No

Audit company: Bureau Veritas CPS

Report reference: 10213211500



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

ETI

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

Additional elements:

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 rd party?	Yes No A1: Please give details: The hotline number of the Ministry of Labour and Social Security (Hotline: 170) is posted at notice boards for workers to raise any issue to official authorities
B: If Yes , are workers aware of these channels and have access? Please give details.	Workers stated that they were aware of this channel during the interviews.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Complaint boxes
D: Which of the following groups is there a grievance mechanism in place for?	₩ Workers □ Communities □ Suppliers □ Other D1: Please give details: Complaint boxes
E: Are there any open disputes?	☐ Yes ☐ No E1: If yes, please give details
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	 ☐ Yes ☐ No F1: If no, please give details
G: Is there a published and transparent disciplinary procedure?	



	I 5-2		
H: If yes, are workers aware of these the disciplinary procedure?	∑ Yes □ No		
	H1: If no, please give details		
I: Does the disciplinary procedure allow for deductions from wages (fines) for	☐ Yes ☐ No		
disciplinary purposes (see wages section)?	E1: If yes, please give details		
To complete 'current systems' Auditors examine punderstand, and record what controls and process procedures are carried out, who is /are responsible to	es are currently in place e.g. record what polic	cies are in place, what relevant Evidence checked should detail	
Current systems: There was no evidence of sexual or other harassment and verbal abuinterviews.			
Evidence examined – to support system de renewal/expiry date where appropriate):	escription (Documents examined & re	levant comments. Include	
Details: Workers has no complaint for any is	ssues currently.		
Any other comments: None			
N	on–compliance: NONE		
Description of non–compliance:	оп сотристот	Objective evidence	
		Objective evidence observed:	
☐ NC against ETI ☐ NC against Loc code:	cal Law NC against customer	N/A	
None observed.			
Observation: NONE			
Description of observation:		Objective evidence observed:	
None observed.		N/A	
		,	
Cood	Examples observed: NONE		



Description of Good Example (GE):	Objective Evidence Observed:
None observed.	N/A

Audit company: Bureau Veritas CPS

Report reference: 10213211500 Date: 24.11.2021

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: There was no immigrant worker.

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

Details: Hiring Procedure, Personnel files, Worker handbook

Any other comments: None

No	on–compliance: NONE	
1. Description of non–compliance: NC against ETI/Additional Elements NC against customer code: None observed.	□ NC against Local Law	Objective evidence observed:
	Observation: NONE	

Audit company: Bureau Veritas CPS

Report reference: 10213211500



Description of observation: None observed.	Objective evidence observed: N/A	
Good examples observed: NONE		
Description of Good Example (GE): None observed.	Objective Evidence Observed: N/A	



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 Company has Environmental Impact Assessment and Environmental Permit but the environmental permit opinion has not been updated after the printing process was added. The company has contracts relating waste disposing. There was no specific areas were separated and labelled for all kind of wastes. Solid wastes, contaminated wastes and medical wastes are disposed of properly.

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

Details: Confirmed with document review (Waste control documents, contracts and logs.) and site tour.

Any other comments: None

Non-compliance: NONE		
1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: Based on satisfactory evidence; An industrial waste management plan was created in the company, but ministry approval was not seen on the audit day.	Objective evidence observed: Document Review, Management Interview	
Local law and/or ETI requirement: WASTE MANAGEMENT REGULATION Official Gazette Date: 02.04.2015 Official Gazette Number: 29314 Obligations of the waste generator and waste owner ARTICLE 9 - (1) Waste producer; c) (Amended: OJ-23/3 / 2017-30016) It is obliged to prepare the waste management plan that it is obliged to prepare for the prevention and reduction of the wastes it produces and to submit it to the provincial directorate and obtain approval.		
Recommended corrective action: It is recommended that management adopt practices and controls to ensure that ministry approval was available for industrial waste management plan.		
2. Description of non–compliance:		



☐ NC against ETI code: Based on satisfactory ev search and use well wa	NC against Local Law vidence; The company doe ter.	_	Objective evidence observed: Document Review, Management Interview
REGULATION 2. DOCUMENT WORKS 2.1. Documentation job For those who will perform 8 of the Law No. 167 on the Groundwater Regul General Directorate of State below: 2.1.1. Groundwater exp 2.1.2 Groundwater usag 2.1.3. Reclamation and	rm the works stated in para Groundwater and the wor ation, it is obligatory to obto State Hydraulic Works. These loration document ge certificate	graphs (a) and (b) of Article ks specified in Article 9 of ain a certificate from the e are the documents listed	
	ive action: It is recommend actices and controls to ens	· ·	
	ompliance: NC against Local Law widence; The company has nit opinion has not been up	an Environmental permit;	Objective evidence observed: Document Review, Management Interview
REGULATIONS 10.09.201 Facilities subject to environment ARTICEL 5 – (1) Facilities permit and licence with according to environment Appendix-2. (2) First of all, facilities list temporary operating certain (3) Facilities obtain temporary	ronmental permit and licenthat subject to environment in the scope of this regulation and impacts of them in the ted in Appendix-1 and Appertificate to operate in porary operating certificate renvironmental permit and	nce Intal permit or environmental Ition are categorized Itio Appendix-1 and Itio are categorized Itio are categori	
	title of an environmental p wner whose license docum		
the registration gazette,	vent that the owner or title , the capacity report and c hall be submitted with a co		

12 The election made by the competent authority shall be revised so long as the previous validity period does not change after permission has been granted or licensed and the license period has been restarded. 13 Recommended corrective action: It is recommended that factory management adopt practices and a control to ensure that environmental permit is obtained from Ministry of Environment and Forestry. 14 Description of non-compliance:		
management adopt practices and a control to ensure that environmental permit is obtained from Ministry of Environment and Forestry. A. Description of non-compliance: NC against Ell NC against Local Law NC against customer code: Based on satisfactory evidence; There is no waste storage area in the company. Local law and/or EII requirement: WASTE MANAGEMENT REGULATION temporary storage ARTICLE 13 - (1) Wastes are stored temporarily in accordance with the criteria determined according to their types at the place where they are produced. (2) Waste that is classified according to its characteristics and stored temporarily is labeled as hazardous or non-hazardous waste, the waste code, the amount of waste stored and the date of storage. (3) Wastes are stored temporarily so that they do not react with each other. (4) The temporary storage of waste is done within the boundaries of the facility/organization where the waste is produced. (5) Temporary storage permission is obtained from the provincial directorate for temporary storage permit is renewed. (6) Municipal waste, packaging waste and medical waste temporary storage area, the temporary storage permit is renewed. (7) Principles regarding temporary storage areas are determined by the Ministry.	the previous validity period does not change after permission has been	
A. Description of non-compliance: □ NC against ETI ○ NC against ETI ○ NC against Local Law □ NC against customer code: Based on satisfactory evidence; There is no waste storage area in the company. Local law and/or ETI requirement: WASTE MANAGEMENT REGULATION temporary storage ARTICLE 13 – (1) Wastes are stored temporarily in accordance with the criteria determined according to their types at the place where they are produced. (2) Waste that is classified according to its characteristics and stored temporarily is labeled as hazardous or non-hazardous waste, the waste code, the amount of waste stored and the date of storage. (3) Wastes are stored temporarily so that they do not react with each other. (4) The temporary storage of waste is done within the boundaries of the facility/organization where the waste is produced. (5) Temporary storage permission is obtained from the provincial directorate for temporary storage areas. In case of a change in the temporary storage area, the temporary storage permit is renewed. (6) Municipal waste, packaging waste and medical waste temporary storage area/containers are exempt from temporary storage permit. (7) Principles regarding temporary storage areas are determined by the Ministry. Recommended corrective action: It is recommended that factory management adopt practices and a control to ensure that waste storage area should available in the company. Objective evidence observed: Document Resultation and the annex5 packaging declaration were not seen on the audit day. Local law and/or ETI requirement: WASTE MANAGEMENT REGULATION	management adopt practices and a control to ensure that environmental	
ARTICLE 13 – (1) Wastes are stored temporarily in accordance with the criteria determined according to their types at the place where they are produced. (2) Waste that is classified according to its characteristics and stored temporarily is labeled as hazardous or non-hazardous waste, the waste code, the amount of waste stored and the date of storage. (3) Wastes are stored temporarily so that they do not react with each other. (4) The temporary storage of waste is done within the boundaries of the facility/organization where the waste is produced. (5) Temporary storage permission is obtained from the provincial directorate for temporary storage areas. In case of a change in the temporary storage area, the temporary storage areas are determined by the ministry. (6) Municipal waste, packaging waste and medical waste temporary storage area/containers are exempt from temporary storage permit. (7) Principles regarding temporary storage areas are determined by the Ministry. Recommended corrective action: It is recommended that factory management adopt practices and a control to ensure that waste storage area should available in the company. Objective evidence observed: Document Review, Management Interview Objective evidence observed: Document Review, Management Interview Objective evidence observed: Document Review, Management Interview Cobjective evidence of the waste declaration and the annex5 packaging declaration were not seen on the audit day. Local law and/or ETI requirement: WASTE MANAGEMENT REGULATION	☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code: Based on satisfactory evidence; There is no waste storage area in the	observed: Document Review, Management
determined according to their types at the place where they are produced. (2) Waste that is classified according to its characteristics and stored temporarily is labeled as hazardous or non-hazardous waste, the waste code, the amount of waste stored and the date of storage. (3) Wastes are stored temporarily so that they do not react with each other. (4) The temporary storage of waste is done within the boundaries of the facility/organization where the waste is produced. (5) Temporary storage permission is obtained from the provincial directorate for temporary storage areas. In case of a change in the temporary storage area, the temporary storage permit is renewed. (6) Municipal waste, packaging waste and medical waste temporary storage area/containers are exempt from temporary storage permit. (7) Principles regarding temporary storage areas are determined by the Ministry. Recommended corrective action: It is recommended that factory management adopt practices and a control to ensure that waste storage area should available in the company. Objective evidence observed: Document Review, Management Interview Objective evidence observed: Document Review, Management Interview Local law and/or ETI requirement: WASTE MANAGEMENT REGULATION	-	
temporarily is labeled as hazardous or non-hazardous waste, the waste code, the amount of waste stored and the date of storage. (3) Wastes are stored temporarily so that they do not react with each other. (4) The temporary storage of waste is done within the boundaries of the facility/organization where the waste is produced. (5) Temporary storage permission is obtained from the provincial directorate for temporary storage areas. In case of a change in the temporary storage area, the temporary storage permit is renewed. (6) Municipal waste, packaging waste and medical waste temporary storage area/containers are exempt from temporary storage permit. (7) Principles regarding temporary storage areas are determined by the Ministry. Recommended corrective action: It is recommended that factory management adopt practices and a control to ensure that waste storage area should available in the company. Objective evidence observed: Document Review, Management Interview The provincial strip is labeled as hazardous variety and the annex5 packaging declaration were not seen on the audit day. Local law and/or ETI requirement: WASTE MANAGEMENT REGULATION		
(4) The temporary storage of waste is done within the boundaries of the facility/organization where the waste is produced. (5) Temporary storage permission is obtained from the provincial directorate for temporary storage areas. In case of a change in the temporary storage area, the temporary storage permit is renewed. (6) Municipal waste, packaging waste and medical waste temporary storage area/containers are exempt from temporary storage permit. (7) Principles regarding temporary storage areas are determined by the Ministry. Recommended corrective action: It is recommended that factory management adopt practices and a control to ensure that waste storage area should available in the company. Objective evidence observed: Document Review, Management Interview Toda: Based on satisfactory evidence; the waste declaration and the annex5 packaging declaration were not seen on the audit day. Local law and/or ETI requirement: WASTE MANAGEMENT REGULATION	temporarily is labeled as hazardous or non-hazardous waste, the waste code,	
(5) Temporary storage permission is obtained from the provincial directorate for temporary storage areas. In case of a change in the temporary storage area, the temporary storage permit is renewed. (6) Municipal waste, packaging waste and medical waste temporary storage area/containers are exempt from temporary storage permit. (7) Principles regarding temporary storage areas are determined by the Ministry. Recommended corrective action: It is recommended that factory management adopt practices and a control to ensure that waste storage area should available in the company. Objective evidence observed: Document Review, Management Interview S. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: Based on satisfactory evidence; the waste declaration and the annex5 packaging declaration were not seen on the audit day. Local law and/or ETI requirement: WASTE MANAGEMENT REGULATION	(3) Wastes are stored temporarily so that they do not react with each other.	
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Recommended corrective action: It is recommended that factory management adopt practices and a control to ensure that waste storage area should available in the company. 5. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: Based on satisfactory evidence; the waste declaration and the annex5 packaging declaration were not seen on the audit day. Local law and/or ETI requirement: WASTE MANAGEMENT REGULATION		
management adopt practices and a control to ensure that waste storage area should available in the company. 5. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: Based on satisfactory evidence; the waste declaration and the annex5 packaging declaration were not seen on the audit day. Local law and/or ETI requirement: WASTE MANAGEMENT REGULATION		
5. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: Based on satisfactory evidence; the waste declaration and the annex5 packaging declaration were not seen on the audit day. Local law and/or ETI requirement: WASTE MANAGEMENT REGULATION	management adopt practices and a control to ensure that waste storage	
Local law and/or ETI requirement: WASTE MANAGEMENT REGULATION	☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code: Based on satisfactory evidence; the waste declaration and the annex5	Review, Management
	Local law and/or ETI requirement: WASTE MANAGEMENT REGULATION	



ğ) It is obliged to fill in the waste declaration form, including the information of the previous year, by using online applications prepared by the Ministry starting from January every year and until the end of March at the latest, to approve it, to print it and to keep a copy for five years.

Recommended corrective action: It is recommended that factory management adopt practices and a control to ensure that waste declarations.

Observation: NONE	
Description of observation: None observed.	Objective evidence observed:

Good examples observed: NONE	
Description of Good Example (GE):	Objective Evidence Observed:
None observed.	N/A

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

Report reference: 10213211500

Photo Form







Outside view of the company

Cutting Section

Cutting Section







Printing Section

Printing Section

Sewing Section







Sewing Section

QC Section

Ironing Section









Packing Section

Packing Section

Stain Removal Room







First Aid Kit

Chemical On site

Chemical Warehouse







Eye Wash Station

Chemical Warehouse

Evacuation map







Fire Hose

Fire Extinguisher

Fire Alarm Button





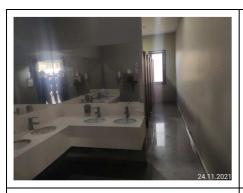




Lunch Hall

Kitchen

Second Building Warehouse







Toilets

Toilets

Electrical Panel







Potable Water

Infirmary

Notice Board







Time Recording Device

Suggestion Box

Tesco Poster on site

Report reference: 10213211500





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

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

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

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

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

Click here for Supplier (B) members:

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d

Click here for Auditors:

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