SMETA Corrective Action Plan Report (CAPR)

Version 6.1

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

Guidance

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

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

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

Root cause (see column 4)

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

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

Next Steps:

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

Audit Details			
Sedex Company Reference: *(only available on Sedex System)*	ZC423033656	Sedex Site Reference: *(only available on Sedex System)*	ZS423033658
Business name (Company name):	Anka Promosyon		
Site name:	Anka Promosyon		
Site address:	Fevzi Çakmak Mahallesi 10631 Sokak No: 4 Konya / Karatay 42050 TR	Country:	TR
Site contact and job title:	AYSE NUR DONMEZ / LEAN PRODUCTIVITY SPECIALIST		
Site phone:	00905554535522	Site e-mail:	yasin.yildirim@dival.com.tr
SMETA Audit Pillars:	☑ Labour Standards ☑ Health and Safety (plus Environment 2-Pillar)	☑ Environment 4-pillar ☑ Business Ethics	
Date of Audit:	2023-08-15		

Audit Company Name:
Intertek Turkey

Audit Conducted By					
Affiliate Audit Company	☑	Purchaser	☐	Retailer	☐
Brand owner	☐	NGO	☐	Trade Union	☐
Multi-stakeholder	☐		Combined Audit (select all that apply)		

Audit Parameters			
Time in and time out	Day 1		
	In	10:00	
	Out	18:00	
Audit type:	FULL_INITIAL		
Was the audit announced?	SEMI_ANNOUNCED		
Was the Sedex SAQ available for review?	Yes		
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No		
Who signed and agreed CAPR	AYSE NUR DONMEZ / LEAN PRODUCTIVITY SPECIALIST		
Is further information available	No		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	No	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	No	No
Reason for absence at the opening meeting	There is no union in the facility. There was 1 worker representative but he could not join the meetings due to workload.		
Reason for absence during the audit	There is no union in the facility.		
Reason for absence at the closing meeting	There is no union in the facility. There was 1 worker representative but he could not join the meetings due to workload.		

Summary of Findings

Issue (please click on the issue title to go direct to the appropriate audit results by clause)	Area of Non–Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
5 - Living wages are paid			0	0	1	GE - fe7f7da1-9900-4a11-a3f2-b1d1fd5c0acb
3 - Working conditions are safe and hygienic	3.1 3.1 3.1 3.1 3.1 3.1 3.1	§1 §2 §3 §4 §5 §6 §7	7	0	0	NC - d388afd0-9b3c-4858-8bd4-00635752b920 NC - de40aa5e-1b32-47fa-92da-8f355e44afae NC - 296c0197-c0c5-479a-a69d-f87431eff211 NC - dba82829-9c04-43d0-826b-147607912611 NC - 89489d02-4ec5-4809-844b-255e3db18470 NC - 8da4fac4-a0f6-4090-82dd-5d9ad7abee22 NC - c508c092-65fd-4ebc-95ad-fa50140fb9b5
10B4 - Environment 4–pillar	10.B4.1	§8	1	0	0	NC - 21ac8827-0064-4254-833a-f2e1396c4abc
9 - No harsh or inhumane treatment is allowed	9.1 9.2		2	0	0	NC - 55ec176e-34d8-4d23-b442-39009832c263 NC - a13c6fb4-1da8-4c52-bc8b-9d3fde0a4c7e
0B - Management systems and code implementation	0.B.2	§9	1	0	0	NC - 7abbc820-186a-4305-a137-06263901640f
6 - Working hours are not excessive	6.4		1	0	0	NC - 8c6775ff-18c8-4d1a-bc86-f98a2ff0e172

Local Law Issues

Issue	Description
§1	In accordance with the Regulation on Protection of Buildings Against Fire (19.12.2007), art 75 (1) Fire detection and warning system which is activated by manually, automatically or by warning received from a fire extinguishing system. (2) Manual fire warning is conducted with fire warning buttons. Fire warning buttons are placed on fire escape routes in the facility. Distance between fire warning button in each floor and from any point on the floor will not exceed 60 m. All fire alarm buttons will be accessible and placed from ground at least 110 cm and at most 130 cm. Art 81 (1) Processes to warn people in the building from any emergency situation can be performed by audible and visual alarm equipments
§2	In accordance with Turkish Regulation about Occupational Health and Safety circumstances using work equipments (25/04/2013) No: 28628 Addition III - Related Matters for Maintenance, Repairs and Periodical Checks Art 2.2.3 Periodical check period and check criteria for lifting and transfer tools are stated on Table 2 provided that the criteria stated in Art 2.1.1 are reserved. Table 2 Equipment : Lift(Man lift, Goods Lift), Forklift, Transpallet, Lifting or transferring tools Check Period(Max): 1 year Art.1.9. In case when non-compliance points are detected in terms of occupational health and safety and operating of the work equipment is inappropriate if these points are not corrected; the work equipment shall not be used until these points are corrected.

§3	In accordance with Occupational Health and Safety Law, 20/06/2012, No: 6331, Article 10; (1) Employer should provide risk assessment regarding the occupational health and safety. In the risk assessment, the issues listed below should be considered; a) The situation of the employees who could be affected by certain risks. b) The choice of the work equipment and chemical substances to be used. c) Organization and order in the workplace d) The situation of the employees who requires special policies as young employees, elders, handicapped employees and breast feeding employees, and of the female employees. (2) Employer determines occupational health and safety measurement to be taken and protective equipment. (3) The occupational health and safety measurement to be taken, working practices and production methods in the workplace should increase the degree of the protection regarding the employees' health and safety, and should be applicable at every level of workplace's administrative structure. (4) Employer ensures that required controls, measurements, examinations and researches are done to define the risks to which the employees are exposed in workplace regarding the occupational health and safety.
§4	In accordance with the Turkish Regulation on the Health and Safety Precautions Taken While Working with the Chemical Substances (12.08.2013) No: 28733 Art. 8 - (1) Employer shall take into consideration following issues in accordance with Regulation on Emergency Cases dated 18.06.2013 and No. 26861 for emergency cases which will be caused by chemical substances. a) Preventive precautions against negative impacts of emergency cases are taken immediately and employees are informed. Necessary actions are taken to return the emergency cases to normal within the shortest time
§5	In accordance with Turkish Regulation about Occupational Health and Safety circumstances using work equipments (25/04/2013) No: 28628 Addition III - Related Matters for Maintenance, Repairs and Periodical Checks Art 2.3.1 Unless otherwise specified in the relevant standards, periodic inspections of the installations are carried out annually. Periodical check period and check criteria for some installments are stated on Table 3 provided that the criteria stated in Art 2.1.1 are reserved. Table 3 Equipment: Fire fighting installment, Hoses, Motopomps, Pipe Systems Check Period (Max): 1 year
§6	Turkish Regulation about Occupational Health and Safety circumstances using work equipments (25/04/2013) No: 28628 Addition III - Related Matters for Maintenance, Repairs and Periodical Checks Art 2.3. installations 2.3.1. Unless otherwise specified in the relevant standards, periodic inspections of installations shall be carried out annually. 2.3.4 (Amended phrase: RG-23/7/2016-29779) Without prejudice to the criteria mentioned in Article 2.3.1, periodic control criteria and control periods of some installations are given in Table 3. Table-3: Periodic control periods and control criteria of the installations (Supplementary Title: RG-23/7/2016-29779) (2)
§7	In accordance with Turkish Regulation about Occupational Health and Safety circumstances using work equipments (25/04/2013) No: 28628 Addition III - Related Matters for Maintenance, Repairs and Periodical Checks Art 2.3.4 Periodical check period and check criteria for some installments are stated on Table 3 provided that the criteria stated in Art 2.1.1 are reserved. Table 3 Equipment: Electricity Installments, Grounding Installments, Lightning Rod Check Period (Max): 1 year
§8	Regulation about the obligatory permits and licenses according to the Environment Law(29.04.2009) No: 27214, Article 4; facilities subject to environment permit or to environment permit and license are classified as below regarding to their impact to environment; 1- Facilities which have contaminating impact to environment at high level (Appendix 1) 2- Facilities which have contaminating impact to environment (Appendix 2) Facilities which listed at Appendix 1 or 2 are required to obtain environment permit or to environment permit and license.
§9	Regulation for facility opening and operating permit (10/8/2005), II. Section Art 6 (Changed first clause: 19/3/2007 – 2007/11882 K.) – A workplace cannot be opened and operated without obtaining a business and working license duly from the competent authorities.

Corrective Action Plan - Non Compliances

Non-Compliance	Evidence
[Back to findings summary]	

Non-Compliance	
Status	OPEN
Reference	d388afd0-9b3c-4858-8bd4-00635752b920
Clause	3 - Working conditions are safe and hygienic
Issue Title	192 - Absence of functional fire alarms / smoke detectors
Subcategory	Fire Safety - Fire alarms & Evacuation
New or carried over?	☑ New ☐ Carried Over
Root cause	☐ Training ☑ System ☐ Costs ☐ Lack of workers ☐ Other
Root cause - Other	
Local law issue	In accordance with the Regulation on Protection of Buildings Against Fire (19.12.2007), art 75 (1) Fire detection and warning system which is activated by manually, automatically or by warning received from a fire extinguishing system. (2) Manual fire warning is conducted with fire warning buttons. Fire warning buttons are placed on fire escape routes in the facility. Distance between fire warning button in each floor and from any point on the floor will not exceed 60 m. All fire alarm buttons will be accessible and placed from ground at least 110 cm and at most 130 cm. Art 81 (1) Processes to warn people in the building from any emergency situation can be performed by audible and visual alarm equipments
ETI code	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.
Explanation to the non compliance	During the facility tour, and according to employee and management interviews, it was observed that there was no alarm system in the facility.//Tesis gezisi, çalışan ve yönetim görüşmelerine göre tesiste alarm sisteminin olmadığı gözlemlendi.
Follow up method	☐ Follow up audit ☑ Desktop audit
Timescale	☐ Immediate ☑ 30 days ☐ 60 days ☐ 90 days ☐ 120 days ☐ 180 days ☐ 365 days ☐ Other

Actions	Please provide alarm system for all areas in the facility.//Lütfen tesisteki tüm alanlar için alarm sistemi sağlayın.	

Non-Compliance	Evidence
[Back to findings summary]	

Non-Compliance	
Status	OPEN
Reference	de40aa5e-1b32-47fa-92da-8f355e44afae
Clause	3 - Working conditions are safe and hygienic
Issue Title	267 - No / inadequate certificates for inspections of machinery, or machines not registered as required by law
Subcategory	Machinery
New or carried over?	☑ New ☐ Carried Over
Root cause	☐ Training ☑ System ☐ Costs ☐ Lack of workers ☐ Other
Root cause - Other	
Local law issue	In accordance with Turkish Regulation about Occupational Health and Safety circumstances using work equipments (25/04/2013) No: 28628 Addition III - Related Matters for Maintenance, Repairs and Periodical Checks Art 2.2.3 Periodical check period and check criteria for lifting and transfer tools are stated on Table 2 provided that the criteria stated in Art 2.1.1 are reserved. Table 2 Equipment : Lift(Man lift, Goods Lift), Forklift, Transpallet, Lifting or transferring tools Check Period(Max): 1 year Art.1.9. In case when non-compliance points are detected in terms of occupational health and safety and operating of the work equipment is inappropriate if these points are not corrected; the work equipment shall not be used until these points are corrected.
ETI code	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.
Explanation to the non compliance	It was not seen the periodical inspection of industrial racks.//Endüstriyel rafların periyodik muayenesi görülmemiştir.
Follow up method	☐ Follow up audit ☑ Desktop audit
Timescale	☐ Immediate ☑ 30 days ☐ 60 days ☐ 90 days ☐ 120 days ☐ 180 days ☐ 365 days ☐ Other

Actions	Please provide periodical inspection of industrial racks.//Lütfen endüstriyel rafların periyodik muayenesini sağlayın.	

Non-Compliance	Evidence
[Back to findings summary]	

Non-Compliance	
Status	OPEN
Reference	296c0197-c0c5-479a-a69d-f87431eff211
Clause	3 - Working conditions are safe and hygienic
Issue Title	152 - Health and safety risk assessment conducted, but not suitable / sufficient and/or documented
Subcategory	Health & Safety Management
New or carried over?	☑ New ☐ Carried Over
Root cause	☐ Training ☑ System ☐ Costs ☐ Lack of workers ☐ Other
Root cause - Other	
Local law issue	In accordance with Occupational Health and Safety Law, 20/06/2012, No: 6331, Article 10; (1) Employer should provide risk assessment regarding the occupational health and safety. In the risk assessment, the issues listed below should be considered; a) The situation of the employees who could be affected by certain risks. b) The choice of the work equipment and chemical substances to be used. c) Organization and order in the workplace d) The situation of the employees who requires special policies as young employees, elders, handicapped employees and breast feeding employees, and of the female employees. (2) Employer determines occupational health and safety measurement to be taken and protective equipment. (3) The occupational health and safety measurement to be taken, working practices and production methods in the workplace should increase the degree of the protection regarding the employees' health and safety, and should be applicable at every level of workplace's administrative structure. (4) Employer ensures that required controls, measurements, examinations and researches are done to define the risks to which the employees are exposed in workplace regarding the occupational health and safety.
ETI code	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.
Explanation to the non compliance	According to document review and management declaration, risk assessment were conducted on 8.2.2021. However, risk assessment was not conducted

	for disabled employees, foreigner employees, old employees and young employees who under 18 are.// Doküman incelemesi ve yönetim beyanına göre 8.2.2021 tarihinde risk değerlendirmesi yapılmıştır. Ancak engelli çalışanlar, yabancı çalışanlar, yaşlı çalışanlar ve 18 yaşından küçük genç çalışanlar için risk değerlendirmesi yapılmamıştır.
Follow up method	☐ Follow up audit ☑ Desktop audit
Timescale	☐ Immediate ☐ 30 days ☑ 60 days ☐ 90 days ☐ 120 days ☐ 180 days ☐ 365 days ☐ Other
Actions	Please conduct risk assessment for all special groups.//Lütfen tüm özel gruplar için risk değerlendirmesi yapın.

Non-Compliance	Evidence

[Back to findings summary]

Non-Compliance	
Status	OPEN
Reference	dba82829-9c04-43d0-826b-147607912611
Clause	3 - Working conditions are safe and hygienic
Issue Title	242 - No / inadequate eye wash / shower station in hazardous environments including chemical areas
Subcategory	Chemicals
New or carried over?	☑ New ☐ Carried Over
Root cause	☐ Training ☑ System ☐ Costs ☐ Lack of workers ☐ Other
Root cause - Other	
Local law issue	In accordance with the Turkish Regulation on the Health and Safety Precautions Taken While Working with the Chemical Substances (12.08.2013) No: 28733 Art. 8 - (1) Employer shall take into consideration following issues in accordance with Regulation on Emergency Cases dated 18.06.2013 and No. 26861 for emergency cases which will be caused by chemical substances. a) Preventive precautions against negative impacts of emergency cases are taken immediately and employees are informed. Necessary actions are taken to return the emergency cases to normal within the shortest time
ETI code	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.
Explanation to the non compliance	During the facility tour, it was observed that there was no eye shower in the place where employees are exposed to chemicals in the production area .//Tesis gezisi sırasında üretim alanında çalışanların kimyasallara maruz kaldığı yerde göz duşu olmadığı gözlemlendi.
Follow up method	☐ Follow up audit ☑ Desktop audit
Timescale	☐ Immediate ☑ 30 days ☐ 60 days ☐ 90 days ☐ 120 days ☐ 180 days ☐ 365 days ☐ Other
Actions	Please provide eye shower all places in the production

	area where employees are expose to chemicals.//Lütfen üretim alanında çalışanların kimyasallara maruz kaldığı yerlerde göz duşu sağlayın.	

Non-Compliance	Evidence
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Non-Compliance	
Status	OPEN
Reference	89489d02-4ec5-4809-844b-255e3db18470
Clause	3 - Working conditions are safe and hygienic
Issue Title	187 - Fire extinguishers not inspected / checked regularly / out of date
Subcategory	Fire Safety - Fire Fighting Equipment
New or carried over?	☑ New ☐ Carried Over
Root cause	☐ Training ☑ System ☐ Costs ☐ Lack of workers ☐ Other
Root cause - Other	
Local law issue	In accordance with Turkish Regulation about Occupational Health and Safety circumstances using work equipments (25/04/2013) No: 28628 Addition III - Related Matters for Maintenance, Repairs and Periodical Checks Art 2.3.1 Unless otherwise specified in the relevant standards, periodic inspections of the installations are carried out annually. Periodical check period and check criteria for some installments are stated on Table 3 provided that the criteria stated in Art 2.1.1 are reserved. Table 3 Equipment: Fire fighting installment, Hoses, Motopomps, Pipe Systems Check Period (Max): 1 year
ETI code	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.
Explanation to the non compliance	It was not seen an annual technical inspection report of the fire installation at the facility. //Firmada yangın tesisatına ait yıllık fenni muayene raporu görülmemiştir.
Follow up method	☐ Follow up audit ☑ Desktop audit
Timescale	☐ Immediate ☑ 30 days ☐ 60 days ☐ 90 days ☐ 120 days ☐ 180 days ☐ 365 days ☐ Other
Actions	Please provide annual technical inspection report of the fire installation at the facility. //Lütfen işletme için yangın tesisatı yıllık fenni muayenesini sağlayınız.

Non-Compliance	Evidence
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Non-Compliance	
Status	OPEN
Reference	8da4fac4-a0f6-4090-82dd-5d9ad7abee22
Clause	3 - Working conditions are safe and hygienic
Issue Title	305 - No / inadequate air quality test
Subcategory	Worker Health
New or carried over?	☑ New ☐ Carried Over
Root cause	☐ Training ☑ System ☐ Costs ☐ Lack of workers ☐ Other
Root cause - Other	
Local law issue	Turkish Regulation about Occupational Health and Safety circumstances using work equipments (25/04/2013) No: 28628 Addition III - Related Matters for Maintenance, Repairs and Periodical Checks Art 2.3. installations 2.3.1. Unless otherwise specified in the relevant standards, periodic inspections of installations shall be carried out annually. 2.3.4 (Amended phrase: RG-23/7/2016-29779) Without prejudice to the criteria mentioned in Article 2.3.1, periodic control criteria and control periods of some installations are given in Table 3. Table-3: Periodic control periods and control criteria of the installations (Supplementary Title: RG-23/7/2016-29779) (2)
ETI code	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.
Explanation to the non compliance	It was not seen an annual technical inspection report of the ventilation in the printing section. // Firmada baskı bölümünde havalandırma tesisatına ait yıllık fenni muayene raporu görülmemiştir.
Follow up method	☐ Follow up audit ☑ Desktop audit
Timescale	☐ Immediate ☐ 30 days ☑ 60 days ☐ 90 days ☐ 120 days ☐ 180 days ☐ 365 days ☐ Other
Actions	Please provide annual technical inspection report of the ventilation at the facility.// Lütfen işletme için havalandırma tesisatı yıllık fenni muayenesini

	sağlayınız.	

Non-Compliance	Evidence
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Non-Compliance	
Status	OPEN
Reference	c508c092-65fd-4ebc-95ad-fa50140fb9b5
Clause	3 - Working conditions are safe and hygienic
Issue Title	220 - Failure to comply with legal requirements for electrical safety, e.g. inspections
Subcategory	Electrical risk
New or carried over?	☑ New ☐ Carried Over
Root cause	☐ Training ☑ System ☐ Costs ☐ Lack of workers ☐ Other
Root cause - Other	
Local law issue	In accordance with Turkish Regulation about Occupational Health and Safety circumstances using work equipments (25/04/2013) No: 28628 Addition III - Related Matters for Maintenance, Repairs and Periodical Checks Art 2.3.4 Periodical check period and check criteria for some installments are stated on Table 3 provided that the criteria stated in Art 2.1.1 are reserved. Table 3 Equipment: Electricity Installments, Grounding Installments, Lightning Rod Check Period (Max): 1 year
ETI code	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.
Explanation to the non compliance	It was seen that annual inspection report of electrical internal installation and grounding system was made on 14.3.2022.//Elektrik iç tesisat ve topraklama sisteminin yıllık muayene raporunun 14.3.2022 tarihinde yapıldığı görüldü.
Follow up method	☐ Follow up audit ☑ Desktop audit
Timescale	☐ Immediate ☑ 30 days ☐ 60 days ☐ 90 days ☐ 120 days ☐ 180 days ☐ 365 days ☐ Other
Actions	Please provide to be made electrical internal inspection and grounding system inspection once in a year.//Lütfen yılda bir kez elektrik iç muayenesi ve topraklama sistemi muayenesi yapılmasını sağlayınız.

Non-Compliance	Evidence
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Non-Compliance	
Status	OPEN
Reference	21ac8827-0064-4254-833a-f2e1396c4abc
Clause	10B4 - Environment 4–pillar
Issue Title	598 - The site does not have all legally required permits for use and / or disposal of resources e.g. energy, water, air emissions, waste etc.
Subcategory	General Environmental Permits, & Management systems
New or carried over?	☑ New ☐ Carried Over
Root cause	☐ Training ☑ System ☐ Costs ☐ Lack of workers ☐ Other
Root cause - Other	
Local law issue	Regulation about the obligatory permits and licenses according to the Environment Law(29.04.2009) No: 27214, Article 4; facilities subject to environment permit or to environment permit and license are classified as below regarding to their impact to environment; 1- Facilities which have contaminating impact to environment at high level (Appendix 1) 2- Facilities which have contaminating impact to environment (Appendix 2) Facilities which listed at Appendix 1 or 2 are required to obtain environment permit or to environment permit and license.
ETI code	10.B4.1 - Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.
Explanation to the non compliance	It was not seen environmental permit or the letter of out of scope at the facility.//Tesiste çevre izni veya kapsam dışı yazısı görülmemiştir.
Follow up method	☐ Follow up audit ☑ Desktop audit
Timescale	☐ Immediate ☑ 30 days ☐ 60 days ☐ 90 days ☐ 120 days ☐ 180 days ☐ 365 days ☐ Other
Actions	Please provide environmental permit or the letter of out of scope at the facility.//Lütfen işletme için çevre izni veya kapsam dışı yazısı sağlayınız.

Non-Compliance	Evidence
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Non-Compliance	
Status	OPEN
Reference	55ec176e-34d8-4d23-b442-39009832c263
Clause	9 - No harsh or inhumane treatment is allowed
Issue Title	578 - Lack of a detailed disciplinary policy that has been communicated to all workers
Subcategory	Discipline Procedures
New or carried over?	☑ New ☐ Carried Over
Root cause	☐ Training ☑ System ☐ Costs ☐ Lack of workers ☐ Other
Root cause - Other	
ETI code	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.
Explanation to the non compliance	It was not seen the disciplinary policy at the facility.//Tesiste disiplin politikası görülmemiştir.
Follow up method	☐ Follow up audit ☑ Desktop audit
Timescale	☐ Immediate ☐ 30 days ☑ 60 days ☐ 90 days ☐ 120 days ☐ 180 days ☐ 365 days ☐ Other
Actions	Please prepare the disciplinary policy and share it with all employees.//Lütfen disiplin politikasını hazırlayın ve tüm çalışanlarla paylaşın.

Non-Compliance	Evidence
[Back to findings summary]	

Non-Compliance	
Status	OPEN
Reference	a13c6fb4-1da8-4c52-bc8b-9d3fde0a4c7e
Clause	9 - No harsh or inhumane treatment is allowed
Issue Title	583 - Lack of a detailed grievance procedure that has been communicated to all workers
Subcategory	Grievance Procedures
New or carried over?	☑ New ☐ Carried Over
Root cause	☐ Training ☑ System ☐ Costs ☐ Lack of workers ☐ Other
Root cause - Other	
ETI code	9.2 - companies should provide access to a confidential grievance mechanism for all workers
Explanation to the non compliance	During the facility tour, it was observed that suggestion boxes were placed in the facility. However, it was not seen the grievance policy at the facility.//Tesis gezisi sırasında tesis içerisine öneri kutularının yerleştirildiği gözlemlenmiştir. Ancak, tesiste herhangi bir şikayet politikası görülmemiştir.
Follow up method	☐ Follow up audit ☑ Desktop audit
Timescale	☐ Immediate ☑ 30 days ☐ 60 days ☐ 90 days ☐ 120 days ☐ 180 days ☐ 365 days ☐ Other
Actions	Please prepare the grievance policy and announce that to all workers.// Lütfen şikayet politikasını hazırlayın ve bunu tüm çalışanlara duyurun.

Non-Compliance	Evidence
[Back to findings summary]	

Non-Compliance	
Status	OPEN
Reference	7abbc820-186a-4305-a137-06263901640f
Clause	0B - Management systems and code implementation
Issue Title	34 - Site is operating without all required in-date licences and permits (e.g. business / factory licence has expired)
Subcategory	Site's licenses & Certifications
New or carried over?	☑ New ☐ Carried Over
Root cause	☐ Training ☑ System ☐ Costs ☐ Lack of workers ☐ Other
Root cause - Other	
Local law issue	Regulation for facility opening and operating permit (10/8/2005), II. Section Art 6 (Changed first clause: 19/3/2007 – 2007/11882 K.) – A workplace cannot be opened and operated without obtaining a business and working license duly from the competent authorities.
ETI code	0.B.2 - Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.
Explanation to the non compliance	There was no the opening and operating permit of the facility.//İşletmeye ait işyeri açma ve çalıştırma ruhsatı bulunmamaktadır.
Follow up method	☐ Follow up audit ☑ Desktop audit
Timescale	☐ Immediate ☑ 30 days ☐ 60 days ☐ 90 days ☐ 120 days ☐ 180 days ☐ 365 days ☐ Other
Actions	Please provide the opening and operating permit at the facility.//Lütfen işletme için işyeri açma ve çalıştırma ruhsatı sağlayınız.

Non-Compliance	Evidence
[Back to findings summary]	

Non-Compliance	
Status	OPEN
Reference	8c6775ff-18c8-4d1a-bc86-f98a2ff0e172
Clause	6 - Working hours are not excessive
Issue Title	473 - Total hours exceed 60 hours per week - ETI requirements are not met - systemic
Subcategory	Excessive hours
New or carried over?	☑ New ☐ Carried Over
Root cause	☐ Training ☑ System ☐ Costs ☐ Lack of workers ☐ Other
Root cause - Other	
ETI code	6.4 - The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.
Explanation to the non compliance	It was noted that the total working hours of the employees exceeded 60 hours per week during peak periods (in all sections). In January 2023, 4 out of 10 employees worked max. 3 times max. 63 hours/week. It was not seen in March 2023 and July 2023.//Yoğun dönemlerde (tüm bölümlerde) çalışanların toplam çalışma saatlerinin haftada 60 saati aştığı kaydedildi. Ocak 2023'te 10 çalışandan 4'ü maks. 3 kez maks. 63 saat/hafta. Mart 2023 ve Temmuz 2023'te görülmedi.
Follow up method	☑ Follow up audit ☐ Desktop audit
Timescale	☐ Immediate ☐ 30 days ☑ 60 days ☐ 90 days ☐ 120 days ☐ 180 days ☐ 365 days ☐ Other
Actions	Please limit the total weekly working hours to 60 hours.//Lütfen haftalık toplam çalışma süresini 60 saat ile sınırlandırınız.

Corrective Action Plan - Good Examples

Good Example	Evidence
[Back to findings summary]	

Good Example	
Status	OPEN
Reference	fe7f7da1-9900-4a11-a3f2-b1d1fd5c0acb
Clause	5 - Living wages are paid
Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport
Subcategory	Benefits & Insurance
New or carried over?	☑ New ☐ Carried Over
Explanation to the good example	Meal and transportation are provided free of charge to all employees//Yemek ve yol çalışanlara ücretsiz olarak sağlanmaktadır.
Evidence	Management & Employee Interviews//Yönetim ve çalışan görüşmeleri

SMETA Declaration

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

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

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

Auditor Team			
Lead Auditor:	MELİS OKTAY	APSCA Number:	32200319
Additional Auditors:	nurselin aras		
Date of declaration:	2023-08-15		

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

Site Representation	
Full Name:	AYSE NUR DONMEZ
Title:	LEAN PRODUCTIVITY SPECIALIST
Date of declaration:	2023-08-15
Comments: *Any exceptions to this must be recorded here (e.g. different sample size):* *Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020).* *The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives*	
1 administrative employee was included to worker interview.	

Guidance on Root Cause

Explanation of the Root Cause Column

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

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

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

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

Some examples of finding a "root cause"

Example 1
Where excessive hours have been noted the real reason for these needs to be understood, whether due to production planning, bottle necks in the operation, insufficient training of operators, delays in receiving trims, etc.

Example 2
A non-compliance may be found where workers are not using PPE that has been provided to them. This could be the result of insufficient training for workers to understand the need for its use; a lack of follow-up by supervisors aligned to a proper set of factory rules or the fact that workers feel their productivity (and thus potential earnings) is affected by use of items such as metal gloves.

Example 3
A site uses fines to control unacceptable behaviour of workers.

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

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

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

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

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

For more information visit: Sedexglobal.com

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:

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