Sedex Members Ethical Trade Audit Report

Version 7

Sedex, 18 St Swithin’s Lane, London, EC4N 8AD, United Kingdom

Contents

Audit content

(1) A SMETA audit was conducted which included some or all of labour standards, health and safety, environment and business ethics. The SMETA minimum requirements were applied and the SMETA auditor manual was followed. 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.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the code areas below.

2-pillar audits include:

- Labour standards:
  - 0. Enabling accurate assessment
  - 1. Employment is freely chosen
  - 1.A. Responsible recruitment and entitlement to work
  - 2. Freedom of association and right to collective bargaining are respected
  - 4. Child labour shall not be used
  - 5. Legal wages are paid
  - 5.A. Living wages are paid
  - 6. Working hours are not excessive
  - 7. No discrimination is practiced
  - 8. Regular employment is provided
  - 8.A. Sub-contracting and homeworkers are used responsibly
  - 9. No harsh or inhumane treatment is allowed
- Health and safety:
  - 3. Working conditions are safe and hygienic
- Environment:
  - 10.A. Environment 2-pillar

4-pillar audits include, in addition to the above:

- Environment:
  - 10.B. Environment 4-pillar
- Business ethics:
  - 10.C. Business ethics

(2) Where appropriate, non-compliances or non-conformances were raised where either local law or the base code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.

(3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

← Contents

Findings →

Audit details

Site details

Sedex site reference	ZS412996074	**Site name**	EREN TARIM URUNLERI SAN VE TIC LTD STI
Business name	EREN TARIM URUNLERI SAN VE TIC LTD STI	**Site address**	SARIIBRAHIMLI MAHALLESI KIZILYAKA MEVKI NO:3 AKDENIZ MERSIN TR 33100

Audit details

Sedex company reference	ZC3343957	**Auditor company name**	GCL International
Audit company address	1, St Mark Street, London, London, GB, E1 8DA		
Date of audit	2026-03-16	**Audit conducted by**	Efe Tas
Audit pillars	Labour Standards | Health and safety | Environment 4-Pillar | Business ethics		

Time in and out

	Day 1		Day 2		Day 3	
	In	08:59	In	00:52	In	08:55
	Out	17:51	Out	17:53	Out	13:29

Audit type	Periodic
Was the audit announced?	Announced

← Contents

Findings →

Was the Sedex SAQ available for review?	Yes
Who signed and agreed CAPR?	Biher ISYARAN / Quality Assurance / SCR
Any conflicting information SAQ/Pre-Audit Info	No
Is further information available?	No

Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting	There's no active trade union.		
Reason for absence during the audit	There's no active trade union.		
Reason for absence at the closing meeting	There's no active trade union.		

← Contents

Findings →

SMETA declaration

Auditor team

SMETA declaration	I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual. 1. Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform. 2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question. 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.
Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)	

Lead auditor	Efe Tas	**APSCA Number**	32400077
Additional auditor			
Date of declaration	2026-03-18		

← Contents

Findings →

Site representation

Declaration	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
Full name	Biher ISYARAN
Title	Quality Assurance / SCR
Date of declaration	2026-03-18

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
2. Freedom of association and right to collective bargaining are respected	2.B Not prohibit, discourage or interfere wit...	Local law	NC ZAF601341668
3. Working conditions are safe and hygienic	3.A Ensure a safe working environment. Put in...	Local law	NC ZAF601341671
	3.D Form a health and safety committee (or in...	Local law	NC ZAF601341682
	3.G Provide sufficient first-aid supplies ons...	Local law	NC ZAF601341670
	3.K Ensure that all premises are safe and hav...	Local law Base code	NC ZAF601341681
	3.L Implement effective processes to manage f...	Local law	NC ZAF601341662
	3.L Implement effective processes to manage f...	Local law	NC ZAF601341663
	3.L Implement effective processes to manage f...	Local law	NC ZAF601341672
	3.M Ensure all machinery is installed, mainta...	Local law	NC ZAF601341669
	3.R Provide clean and secure toilets, wash ar...	Local law	NC ZAF601341664
	3.R Provide clean and secure toilets, wash ar...	Local law	NC ZAF601351335
4. Child labour shall not be used	4.C Ensure that workers under 18 (but above l...	Local law	NC ZAF601341674
	4.C Ensure that workers under 18 (but above l...	Local law	NC ZAF601341684
5. Legal wages are paid	5.A Ensure that all workers (including non-em...	Local law	NC ZAF601341667
	5.B Ensure that workers receive the insurance...	Local law	NC ZAF601341673
5.A. Living wages are paid	5.A.A Review workers' total pay including ben...	Base code	NC ZAF601351336

← Contents

Management systems →

	5.A.B Put in place a wage improvement plan th...	Base code	NC	ZAF601351337
6. Working hours are not excessive	6.A Ensure working hours (including overtime)...	Local law	NC	ZAF601341666
	6.A Ensure working hours (including overtime)...	Local law	NC	ZAF601341677
	6.B Ensure workers receive all legally requir...	Local law	NC	ZAF601341678
	6.C Provide workers with at least 24 hours of...	Local law	NC	ZAF601341679
	6.D Ensure that working hours do not exceed 6...	Base code	NC	ZAF601341680
	6.D Ensure that working hours do not exceed 6...	Base code	NC	ZAF601341685
	6.F Ensure that where overtime is used, it is...	Local law	NC	ZAF601341675
	6.H Ensure that overtime is always compensate...	Local law	NC	ZAF601341676
9. No harsh or inhumane treatment is allowed	9.E Ensure appropriate training for workers a...	Base code	NC	ZAF601341683
10.A. Environment 2-Pillar	10.A.B Comply with relevant local, regional a...	Local law	NC	ZAF601341665
10.B. Environment 4-Pillar	10.B.E Identify and monitor potential negativ...	Local law	NC	ZAF601351338

← Contents

Management systems →

Management systems

	Policies and procedures	Resources	Communication and training	Monitoring
1. Employment is freely chosen	ⓘ	ⓘ	ⓘ	ⓘ
1.A. Responsible recruitment and entitlement to work	ⓘ	ⓘ	ⓘ	ⓘ
2. Freedom of association and right to collective bargaining are respected	ⓘ	ⓘ	ⓘ	ⓘ
3. Working conditions are safe and hygienic	ⓘ	⚠	⚠	⚠
4. Child labour shall not be used	ⓘ	⚠	⚠	⚠
5. Legal wages are paid	ⓘ	⚠	⚠	⚠
6. Working hours are not excessive	ⓘ	⚠	⚠	⚠
7. No discrimination is practiced	ⓘ	ⓘ	ⓘ	ⓘ
8. Regular employment is provided	ⓘ	ⓘ	ⓘ	ⓘ

✗ Not addressed

⚠ Fundamental improvements required

ⓘ Some improvements recommended

✓ Robust management systems

← Summary of findings

Site details →

	Policies and procedures	Resources	Communication and training	Monitoring
8.A. Sub-contracting and homeworkers are used responsibly	Some improvements recommended	Some improvements recommended	Some improvements recommended	Some improvements recommended
9. No harsh or inhumane treatment is allowed	Some improvements recommended	Some improvements recommended	Some improvements recommended	Some improvements recommended
10.A. Environment 2-Pillar	Some improvements recommended	Some improvements recommended	Some improvements recommended	Fundamental improvements required
10.C. Business ethics	Some improvements recommended	Some improvements recommended	Some improvements recommended	Some improvements recommended

- Not addressed
- Fundamental improvements required
- Some improvements recommended
- Robust management systems

Site details

Company and site details

Sedex company reference	ZC3343957	
Sedex site reference	ZS412996074	
Company name	EREN TARIM URUNLERI SAN VE TIC LTD STI	
Business ownership type	GOODS	
Site name	EREN TARIM URUNLERI SAN VE TIC LTD STI	
Site name in local language	EREN FABRIKA	
GPS location	**GPS address**	Sariibrahimli Mahallesi Kizilyaka Mevki No:3, 33100 Akdeniz/Mersin
	Coordinates	36° 52' 3.42" N ; 34° 47' 24.44" E
Is the worksite in a remote location, far from habitation?	No	
Site contact	**Contact name**	Bihter Isyaran
	Job title	Quality Assurance / SCR
	Phone number	+903244541487
	Email	bihter@erentarim.com.tr
Applicable business and other legally required business license numbers and documents	Business Opening and Working License: No. 97447853-307.04 588/1161 dated 08.01.2021; Tax Certificate dated 01.01.1993 tax numbered 3530064263; Activity Certificate No. 2774 dated 16.01.2024; Capacity Report: Report number 270 dated 02.07.2024.	

← Management systems

Worker analysis →

Site activities

Site function	Factory Processing/Manufacturer	
Site activities	**Primary**	Processing and preserving of fruit and vegetables
	Secondary	
	Other	
Product type	Packaged Fruit	
Process overview	Mein Product: Packaged Fruit Main Operations: Washing: Fruits coming from the garden are subjected to a pre-washing process and then kept in an open area for one day to dry. Selection: The removal of leaves and rotten fruit by visual inspection. Shampooing, Disinfection:, Waxing and Drying The fruits brought to the production area are shampooed, disinfected, waxed, and dried in the same machine. Sorting: The sorting fruits are sorted according to size, packaged, and prepared for shipment. 2 washing machine,, 2 Shampooing, Disinfection:, Waxing and Drying machines, 2 Sorting lines. There is 2 productionn lines in the company.	
What level of mechanization best describes the work at this site?	Fair mechanisation / manual Labour	

← Site details

Worker analysis →

Site scope

Is the audited site a physically continuous area?	Yes	
What is the area of audited site to its boundary?	15979m²	
Building 1	**Last construction works on site**	2002
	If building is shared, provide details	Building not shared.
	Number of floors	2
	Description of floor activities	First Floor: Production, warehouses, chemical storage area, infirmary room, Mezzanine Floor: Packaging materials preparation area
Is there any difference between the site scope of the audit and the Sedex site profile?	No	
Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?	No	
Is any activity conducted onsite not included within the scope of the audit?	No	

Worker accommodation and transport

Are there any site-provided worker accommodation buildings?	Yes

← Site details

Worker analysis →

Worker accommodation and transport

Is the accommodation within the perimeter of the site audited?	Onsite
Is the accommodation contractually mandated for workers?	Optional
Who provides the accommodation?	Site
Was all accommodation (whether directly or via third parties, off or onsite) included in this audit?	Partial There's on-site dormitory in facility's area, there's 17 room in dormitory. %2 of workers in on-site accommodation.
Does the site organise worker transport to the worksite?	Third party Facility does provide transportation with one vehicle and also for other vehicles facility has contract between a transportation service firm is provided by third parties, permits seen.

Work patterns

Approximate workers on site per month (% of peak)	**January**	90-100%	**February**	90-100%
	March	90-100%	**April**	90-100%
	May	90-100%	**June**	90-100%
	July	80-90%	**August**	80-90%
	September	90-100%	**October**	90-100%
	November	90-100%	**December**	90-100%

Is there any night shift work at the site?	No

← Site details   Worker analysis →

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact?	Other certification ISO9001:2015 - Issue Date: 24.02.2026 - Validit: 23.02.2029 ISO27001:2022 - Issue Date: 24.02.2026 - Validit: 23.02.2029
Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community?	No Site is not assessed for negative impacts.
Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?	No Site has not been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site.

Worker analysis

Gender disaggregated data available	Men and women

Worker totals

	Men		Women		Other		Total	
Number of workers	70	*(32.4%)*	146	*(67.6%)*	-	-	216	*(100%)*

Workers by type

	Men		Women		Other		Total	
Permanent workers (employees)	34	*(81%)*	8	*(19%)*	-	-	42	*(19.4%)*
Temporary or fixed term employees	0	-	0	-	-	-	0	*(0%)*
Agency or subcontracted workers	0	-	0	-	-	-	0	*(0%)*
Seasonal workers	36	*(20.7%)*	138	*(79.3%)*	-	-	174	*(80.6%)*
Self-employed workers	0	-	0	-	-	-	0	*(0%)*
Informal workers including home workers	0	-	0	-	-	-	0	*(0%)*
Apprentices, trainees or interns	0	-	0	-	-	-	0	*(0%)*

* % of total workforce

← Site details

Worker interviews →

Migrant workers

	Men		Women		Other		Total	
Domestic migrant workers	0	-	0	-	-	-	0	*(0%)*
International migrant workers	0	-	0	-	-	-	0	*(0%)*
Total migrant workers	0	-	0	-	-	-	0	*(0%)*

* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from None.

Workers by age

	Men		Women		Other		Total	
18 - 24 years old	12	*(28.6%)*	30	*(71.4%)*	-	-	42	*(19.4%)*
15 - 17 years old	31	*(86.1%)*	5	*(13.9%)*	-	-	36	*(16.7%)*
Under 15 years old	0	-	0	-	-	-	0	*(0%)*

* % of total workforce

← Worker analysis Worker interviews →

Is the worker analysis data relevant for peak season and current to the audit?	Yes
Please list the nationalities of all workers, with the three most common nationalities listed first	Turkish

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Turkish	32%	68%	-	100%

Workers by remuneration type

	Men		Women		Other		Total	
Workers paid per unit (piece rate)	0	-	0	-	-	-	0	*(0%)*
Workers paid based on a mix of 'piece work' and hourly rate	0	-	0	-	-	-	0	*(0%)*
Workers paid hourly / daily rate	70	*(32.4%)*	146	*(67.6%)*	-	-	216	*(100%)*
Salaried workers	0	-	0	-	-	-	0	*(0%)*

* % of total workforce

← Worker analysis

Worker interviews →

Workers by payment cycle

	Men		Women		Other		Total	
Paid daily	0	-	0	-	-	-	0	(0%)
Paid weekly	0	-	0	-	-	-	0	(0%)
Paid monthly	70	(32.4%)	146	(67.6%)	-	-	216	(100%)
Other	0	-	0	-	-	-	0	(0%)

* % of total workforce

If other payment cycle entered, please provide details	None

People in managerial, supervisorial and administrative roles

	Men		Women		Other		Total
Employees in management positions	1	(100%)	0	(0%)	-	-	1
Supervisors or team leaders	22	(78.6%)	6	(21.4%)	-	-	28
Administrative staff	14	(100%)	0	(0%)	-	-	14

← Worker analysis

Worker interviews →

Worker interview summary

Gender disaggregated data available	Men and women
Which methods of worker engagement were used?	Individual interviews Group interviews

Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?	
Was the interview sample representative of all types of nationality and employment types of workers?	Yes
Was the interview sample representative of the gender composition of the workforce?	Yes
Number and size of group interviews	4 Group of 5 workers
Did workers understand the purpose of the audit?	Yes
Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers?	Yes

← Worker analysis
Measuring workplace impact →

Was there any indication that workers had been 'coached' in how they should respond to questions?	No
What was the general attitude of the workers towards their workplace?	Favorable

Attitude of workers

In which areas did workers raise significant concerns or complaints?	Other (provide details) No significant concerns or complaints raised by workers.
What did the workers like the most about working at this site?	Accommodation standards Communication (e.g. from management) Work atmosphere (e.g. treatment by supervisors)
Additional comments	26 workers were selected interviews for randomly or according to their age, physical appearance, health care reports, sections or personal file records. 6 individual and 4 interview group (5 workers in a group) were conducted confidentially in an isolated meeting room. Their thoughts were asked about the workplace and working conditions. Interviewed workers informed their pleasure about lunch and transportation, friendship in the facility and hours worked ,rest days and breaks. No negative feedback was raised.
Attitude of workers' committee/union representatives	During the audit 1 worker representative interviewed. Representative stated that to anonymously raise the workers' complaints to management if needed. They control suggestion boxes every month and worker can communicate with them whenever they want.
Attitude of managers	Upon arrival the auditor team was greeted by Bihter ISYARAN / Quality Assurance / SCR . The company management was kind, cooperative, and polite during the audit process. They were actively involved during the audit and acted carefully in line with the explanations of the audit team at the opening meeting to carry out the audit process and to understand the results at the closing meetings

← Worker analysis

Measuring workplace impact →

Workers interviewed by type

	Total
Permanent workers	5
Temporary or fixed-term employees	0
Agency or subcontracted workers	0
Seasonal workers	21
Other workers	0
Total number of workers interviewed	26

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	8	12	-	20
Workers interviewed individually	2	4	-	6

← Worker analysis

Measuring workplace impact →

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	0	0	-	0
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	0	0	-	0

← Worker interviews

Measuring workplace impact →

Measuring workplace impact

Gender disaggregated data available	Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	5.0%	6.0%	-	11.0%
Last full calendar year (2025)	10.0%	12.0%	-	22.0%
Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

* Number of workers leaving in last 12 months as a % of average total number of workers on site over the year.

Rate of absenteeism (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	1.0%	3.0%	-	4.0%
Last full calendar year (2025)	2.0%	3.0%	-	5.0%
Previous full calendar year (2024)	2.0%	4.0%	-	6.0%

Number of days lost through job absence in the year, calculated as: (Number of days lost through job absence in the year) / [(Number of employees on 1st day of the year + Number of employees on the last day of the year) / 2] * (Number of available workdays in the year).

Are accidents recorded?	Yes Accident records have been checked. However, there is no accident for last 1 year.

← Worker interviews

Code area 0 →

Annual number of work related accidents and injuries (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%
Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

* Calculated as (number of work related accidents and injuries * 100) / number of total workers.

Lost day work cases (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%
Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

* Calculated as (number of lost days due to work accidents and work related injuries * 100) / number of total workers.

Percentage of workers that work on average more than 48 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%

← Worker interviews

Code area 0 →

Percentage of workers that work on average more than 48 total hours in a given week

Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

Percentage of workers that work on average more than 60 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	15.0%	17.0%	-	32.0%
Last full calendar year (2025)	13.0%	13.0%	-	26.0%
Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

← Measuring workplace impact

Code area 1 →

Systems and evidence examined to validate this code section	-The facility has Social Responsibility Policy 21.05.2019 and Human Rights Policy 21.05.2019 . Social Responsibility Policy includes the human rights and that is approved at the most senior level, communicated to all personnel, and trained to relevant personnel with training and announcement boards. -A designated person whose name is Bihter Isyaran is in charge of reviewing and implementing standards of human rights , she's also responsible of production and as Quality Assurance / SCR. -The company has a social Responsibility policy, covering human rights impacts and issues and it is also communicated to all the employees. - The auditor verified below documents, policy and procedure to make sure factory follows and understand universal rights It was more a check on the business implementation of the various processes to meet workers universal rights. -26 sampled workers' personnel files, wage records and attendance records checked to validation of WRs during audit. -Facility did not attempt bribery and requested documents and proofs provided to the auditor during the audit. -05.01.2026 dated Social Compliance Training record seen. -The site provided an accurate site description and Sedex site profile declared prior to or during the audit Evidence examined to validate this code section: -Sedex SAQ -Social Responsibility Policy dated 21.05.2019 -Human Rights Policy 21.05.2019 -Social Compliance Training records dated 05.01.2026. -Worker Interviews, -Management Interactions -26 selected workers' personnel files, contracts, working hours records and wage slips

0. Enabling accurate assessment

Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment?	No
Did any workers selected by the auditor decline to be interviewed?	No
Were any external stakeholders such as consultants, customer representatives, industry experts etc. present during the audit?	No

← Code area 0

Code area 1 →

1. Employment is freely chosen

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended

← Code area 0

Code area 1.A →

Management systems

Explanation for management systems grades	-Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met: Facility has Social Responsibility Policy 21.05.2019 It is recommended that the Social Responsibility Policy includes more emphasis on non-discrimination during recruitment. The policy should focus on including details that clearly define the concept of freely chosen employment, not coercion or pressure. Regular review of the policy and procedures should also be addressed. Documentation created and refer national regulations however facility shall create a suitable system for the publication, control and revision of documents and facility has more detailed policies and procedures to determined recruitment conditions. -Appoint a manager with sufficient seniority who is responsible for implementing procedures: Bihter Isyaran is in charge of reviewing and implementing standards of human rights,she's also responsible of Quality Assurance and SCR Multiple job descriptions and lack of some outline of roles and responsibilities. A clear documented matrix and description is needed to ensure accountability in implementing policies and procedures. -Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures: 05.01.2026 dated training records available training topics such as recruitment conditions, ETI Base Code, freedom of association, forced labor, wages and benefits, working hours, workplace rules, and discrimination. Detailed training plan is required and detailed training is required for responsible of implementation of policies and procedures. Interviews with workers and management showed that the provision of training was positive, but workers did not fully understand the content of the training. -Monitor the effectiveness of procedures to meet policy and Workplace Requirements: Facility shall have detailed verification method to monitoring of absenteeism and turnover rates, and create a KPI system to validate absenteeism and turnover rates. The facility should have methods to identify non-compliance, such as worker surveys, worker meetings, etc. to determine if coercive practices are occurring and take corrective action when necessary.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

← Code area 0 Code area 1.A →

No findings

← Code area 0

Code area 1.A →

Systems and evidence examined to validate this code section	-Facility has Social Responsibility Policy 21.05.2019 and a Human Rights Policy dated 21.05.2019 dated Social Responsibility Policy includes human rights and that is approved at the most senior level, communicated to all personnel, and trained to relevant personnel with training and announcement boards. -Movement of the workers are not limited. -The employees have free access to toilets and potable water. -Only copies of the original documents are kept by the Facility. -Overtime is voluntary. -The facility does not use any prison labor. -Workers are free to leave their employer after reasonable notice. -Workers do not have to lodge any deposits and are free to leave in line with legal requirements. -26 workers personnel files, wage slips and time records verified during audit. -05.01.2026 dated training records controlled. -The lowest paid worker earns equal to the daily minimum legal wage. -That the facility does not seek to profit from forced labor, human trafficking, debt bondage/ bonded labor or any other form of modern slavery. Human trafficking, debt bondage, prison labor are prohibited on the workplace. -The facility does not control workers through threats, penalties, coercion, physical force, violence, or harsh or inhumane treatment. -Facility does not unreasonably prevent workers from communicating with others inside or outside the workplace, deny workers social interaction or otherwise intentionally subject workers to isolation. Evidence examined to validate this code section -Social Responsibility Policy 21.05.2019 -Human Rights Policy dated 21.05.2019 -Social Compliance Training records dated 05.01.2026.

← Code area 0

Code area 1.A →

-Worker Interviews,
-Management Interactions
-26 selected workers' personnel files, contracts, working hours records and wage slips

← Code area 0

Code area 1.A →

1. Employment is freely chosen

Data points

If required under local law, is there a published 'modern slavery' or similar statement?	Yes There's no local law requirement about 'modern slavery' or similar statement in Turkey, facility has Human Rights Policy 21.05.2019 dated.
Does the site utilise any workers who are prisoners?	No
Does the site use the labour of persons required to work under any government scheme?	No

← Code area 1 Code area 1.A →

1.A. Responsible recruitment and entitlement to work

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended

← Code area 1

Code area 2 →

Management systems

Explanation for management systems grades	-Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met: Facility has Social Responsibility Policy 21.05.2019. Documentation created and refer national regulations however facility shall create a suitable system for the publication, control and revision of documents and facility has more detailed policies and procedures to determined recruitment conditions. Improvements should focus on developing detailed policies that workers clearly understand, including preventing restrictions on freedom of association. -Appoint a manager with sufficient seniority who is responsible for implementing procedures: Bihter Isyaran is in charge of reviewing and implementing standards of human rights,she's also responsible of Quality Assurance and SCR. Multiple job descriptions and lack of some outline of roles and responsibilities. . A clear and documented definition is needed to ensure accountability for effective implementation and oversight of procedures -Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures: 05.01.2026 dated training records available training topics such as recruitment conditions, ETI Base Code, freedom of association, forced labor, wages and benefits, working hours, workplace rules, discrimination .Detailed training plan is required and detailed training is required for responsible of implementation policies and procedures. Interviews with workers and management showed that the provision of training was positive, but workers did not fully understand the content of the training. -Monitor the effectiveness of procedures to meet policy and Workplace Requirements: Facility shall have detailed verification method to monitoring of absenteeism and turnover rates, and create a KPI system to validate absenteeism and turnover rates. The facility should have methods to identify non-compliance, such as worker surveys, worker meetings, etc. to determine if coercive practices are occurring and take corrective action when necessary.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 1

Code area 2 →

Systems and evidence examined to validate this code section	-Facility has Social Responsibility Policy 21.05.2019 -All workers had the proper legal rights to work in Turkey. -The youngest age was 16 years old which complies with legal requirements. - 100% of workers' recruited by the facility. -Recruitment fees such as medical examination paid by facility, health records of selected workers' examined, and during document reviews, worker interviews and management interactions it's seen that there's no fee paid by workers during recruitment stages, all costs paid by employer. -Facility determined the age verification method clearly on relevant policies and procedures, if any child labor detected they has a system to rehabilitation of child labor. -Facility controls the original DOB Certificates, passports and work permit during recruitment stages and only copies of documents kept in personnel files. -Facility do not using labor provider to recruitment, all workers directly hired by site. -Facility is a fruit packing company , there's manual mechanization with manual laboring, Selection, Washing, Sorting, Shampooing, Disinfestation, Waxing, Drying (Oven), Storage, Shipment processes carried out. Processes verified during audit with site tour. -During audit 26 selected workers' personnel files, wage slips and time records, disciplinary actions records, Worker representatives meeting records checked to validate this section Evidence examined to validate this code section :-Social Responsibility Policy 21.05.2019 -Social Compliance Training records dated 05.01.2026. -Worker Interviews, -Health check records. -Management Interactions -26 selected workers' personnel files, contracts, working hours records and wage slips

← Code area 1

Code area 2 →

1.A. Responsible recruitment and entitlement to work

Data points

Labour hire

Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes?	Workers are recruited, selected, and hired directly by our company
How do the labour providers recruit and hire workers?	N/A - Recruitment providers not used
Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey?	0
Are there any subcontracted workers (excluding dispatched labour) on site?	No
Were all non-employee (e.g. agency or subcontracted) workers included within the scope of this audit for the purpose of document review and (if onsite on date of audit) interview?	Not Applicable
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Not Applicable

Migrant workers

Do any workers migrate across international borders to work at this site?	No

← Code area 1.A

Code area 2 →

Percentage of workers that are migrant	0%
Do any workers migrate from other states, provinces or regions within the country to work at this site?	No

Recruitment fees

Have any workers who started at this site in the last 12 months (new workers) paid any recruitment fees or associated costs, such as visas or travel, which have not been fully repaid?	No - all new workers were recruited locally by the site
Select 1 to 3 sending countries of new workers, who have paid any recruitment fees and associated costs. Record fees and costs in the following tables.	Turkey

New workers totals

	Turkey
Number of workers	152

Recruitment fees

	Turkey
Payments made in exchange for work	-
Recruitment services which are not optional	-
Other or uncategorised	-

← Code area 1.A
Code area 2 →

Related costs

	Turkey
Medical costs	✓
Insurance costs	-
Skills and qualification tests	-
Training and orientation	-
Equipment costs	-
Travel costs	-
Accommodation costs	-
Administrative costs	-
Other or uncategorised	-

Illegitimate costs

	Turkey
Payments made to illegitimate actors involved in the recruitment process	-
Payments made to illegitimate actors during the course of employment	-
Other or uncategorised	✓

← Code area 1.A

Code area 2 →

Was any worker in this group in debt as a result of these costs?

	Turkey
Yes - to a recruiter	-
Yes - to the audited site	-
Yes - to a third party	-
No - could not verify	✓

Highest total costs incurred

	Turkey
Currency	TRY
Highest total costs incurred	0.0

Additional comments

← Code area 1.A

Code area 2 →

2. Freedom of association and right to collective bargaining are respected

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended

← Code area 1.A

Code area 3 →

Management systems

Explanation for management systems grades	-Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met: Facility has Social Responsiblity Policy dated 21.05.2019 Documentation created and refer national regulations however facility shall create a suitable system for the publication, control and revision of documents and facility has more detailed policies and procedures to determined worker representative mechanism -Appoint a manager with sufficient seniority who is responsible for implementing procedures: Bihter Isyaran is in charge of reviewing and implementing standards of human rights,she's also responsible of Quality Assurance and SCR Multiple job descriptions and lack of some outline of roles and responsibilities. . A clear and documented definition is needed to ensure accountability for effective implementation and oversight of procedures. -Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures: 05.01.2026 dated training records available,training topics included recruitment conditions, ETI Base Code, freedom of association, forced labor, wages and benefits, working hours, workplace rules, discrimination , detailed training plan is required and training effectivess shall increase for all relevant. Worker representatives shall have detailed information about their roles and responsibilities -Monitor the effectiveness of procedures to meet policy and Workplace Requirements: Document reviews and management and employee interviews have revealed that employee representatives were appointed, not elected. It is recommended that employee representatives be elected. And facility shall create a proper system to monitor training effectiveness about FOA and worker representative mechanism. Effective use of the Request and Complaint mechanisms, record keeping and employee awareness monitoring should continue on an ongoing basis.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

← Code area 1.A

Code area 3 →

2. Freedom of association and right to collective bargaining are respected	2.B Not prohibit, discourage or interfere wit...	Local law	NC	ZAF601341668

Systems and evidence examined to validate this code section	Facility has Social Responsiblity Policy dated 21.05.2019. - There is no union, however, the workers are free to join any union. Worker representative, and management and document review, It was noted by document review and management interview that worker representatives were assigned by the management without an election on 15.09.2025Worker representative and HR meet to check grievances boxes monthly. The last check done on 05.03.2026. -During document controls and interviews it's observed that worker representatives can free to do their duties about worker representation mechanism. There's no interference with committee activities. - Grievance procedure announced to workers. Suggestion box contents are checked by worker representatives and HR. After meetings work force informed by representatives if any decision made. -It was noted by document review and management interview that worker representatives were assigned by the management without an election on 15.09.2025. Evidence examined to validate this code section :-Social Responsiblity Policy 21.05.2019 -Social Compliance Training records dated 05.01.2026. -Worker Representative assigned records and training and meeting records. -Worker Interviews, -Health check records. -Management Interactions -26 selected workers' personnel files, contracts, working hours records and wage slips.

← Code area 1.A

Code area 3 →

Findings: non-compliances

ZAF601341668

Non-compliance

Due 2024-05-05

Code area

2 Freedom of association and right to collective bargaining are respected

Workplace requirement

2.B Not prohibit, discourage or interfere with workers' rights to join a trade union of their own choosing or other form of worker representation, including worker committees or similar arrangements where the right to freedom of association is restricted under law. This should include the fair and free selection and election of representatives, and their rights to engage in collective bargaining.

Issue title

129 - Worker/union representatives are not freely elected (e.g. they are assigned by management)

Description

It was noted by document review and management interview that worker representatives were assigned by the management without an election on 15.09.2025.

Description (carried over)

It was noted by document review and management interview that worker representatives were assigned by the management without an election on 25.04.2023.

Corrective and preventative actions

It is recommended that worker representatives are elected by their co-workers.

Corrective and preventative actions (carried over)

It is recommended that worker representatives are elected by their co-workers.

Status

Open*

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

← Code area 2

Code area 3 →

Local law reference

QUALIFICATIONS AND SELECTION PROCEDURES OF EMPLOYEE REPRESENTATIVES RELATED TO OCCUPATIONAL HEALTH AND SAFETY NOTIFICATION ON THE PRINCIPLES Determination of employee representative candidates ARTICLE 5 – (1) It is essential that the employee representative is elected from among the employees, if there is no authorized union in the workplace. (2) If the employee representative is determined by election, a period of not less than seven days is required for the employee representative candidate applications to be made. It is recognized and announced by the employer in the workplace. (3) It is essential for employees in the workplace to meet the criteria in Article 6 in order to be a candidate. If they meet these criteria, they can be candidates. cannot be prevented. (4) Necessary conditions are provided for the works and procedures related to the holding of elections and a sufficient number of personnel are assigned by the employer. (5) The number of candidates cannot be more than three times the number of mandatory employee representatives in the workplace. In case of excess, employee representative candidates; education the employer within a maximum of three days from the end of the period specified in the second paragraph, based on the situation, experience period in the workplace and age criteria. It is announced by. Conditions for election or appointment of employee representatives ARTICLE 8 – (1) The election is made by a vote in which at least one more than half of the employees in the workplace participate. It is essential that voting be done secretly. Most The candidate or candidates who receive the most votes are declared as employee representative or representatives. In workplaces that work in shifts, elections are held in all shifts. It is arranged in a way that allows employees to vote. (2) In case of equality of votes, employee representative; Based on candidates' education level, duration of experience in the workplace and similar criteria determined by the employer. The election is valid for five years based on its results. (3) If the employee representative resigns for any reason, the candidate who receives the most votes according to the previous election results is appointed.

* PDF generated at 05:06 (UTC) on 23 Mar 2026. View this finding on the Sedex platform for live updates and closure details.

← Code area 2

Code area 3 →

2. Freedom of association and right to collective bargaining are respected

Data points

Are trade unions allowed by law in the national context?	Yes
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	Not Applicable
Are there alternative worker representative bodies in place?	None
Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	Yes
Are the worker representatives freely elected by the workforce as a whole?	No
Does union/worker committee membership reflect the gender composition of the workforce?	Yes
Does the membership reflect the nationality composition of the workforce?	Yes

← Code area 2

Code area 3 →

Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years?	No

[← Code area 2] [Code area 3 →]

3. Working conditions are safe and hygienic

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Fundamental Improvements Required
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Fundamental Improvements Required
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required

← Code area 2

Code area 4 →

Management systems

Explanation for management systems grades	-Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met: Facility has Social Responsibility Policy 21.05.2019. Documentation created and refer national regulations however facility shall create a suitable system for the publication, control and revision of documents. -Appoint a manager with sufficient seniority who is responsible for implementing procedures:Bihter Isyaran is in charge of reviewing and implementing standards of human rights,she's also responsible of Quality Assurance and SCR. Facility also has contracted OHS Expert and workplace physician OSH Expert Bedran AKBOGA - IGU-416125 contract dated 15.10.2025 , workplace physician Zeki TANTOĞLU - İH-257514 contract dated 17.02.2026 . During the document check, management interview and site tour it was observed that the company failed on building safety permit, VOC Exposure Measurement, H&S Committee meeting, periodic checks, and evacuation drill. The company's senior management should make and effort to solution of this topics -Communicate and train employees and other workers, The last whole OHS Training was carried out on 23.02.2026. Basic OHS training is given to employees upon recruitment. , detailed training plan is required and detailed training is required for responsible of implementation policies and procedures. Workers' awareness should be increased about OHS measurements. The company has NCs related to OHS issues. It is recommended that the training be repeated to cover all NCs identified during the audit and that all employees be trained on these topics. -Monitor the effectiveness of procedures to meet policy and Workplace Requirements: Facility monitors the compliance this WR section however facility failed about certain requirements in this section facility should improve the monitoring and complying about this compliance obligations. Risk analyses are actively reviewed and updated. During the document check, management interview and site tour it was observed that the company failed on building safety permit, VOC Exposure Measurement, H&S Committee meeting, periodic checks, legal permit of kitchen and evacuation drill. Monitorings about these topics must be provided. Monitoring of compliance obligations should be improved

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

← Code area 2 Code area 4 →

3. Working conditions are safe and hygienic	3.A Ensure a safe working environment. Put in...	Local law	NC	ZAF601341671
	3.D Form a health and safety committee (or in...	Local law	NC	ZAF601341682
	3.G Provide sufficient first-aid supplies ons...	Local law	NC	ZAF601341670
	3.K Ensure that all premises are safe and hav...	Local law Base code	NC	ZAF601341681
	3.L Implement effective processes to manage f...	Local law	NC	ZAF601341662
	3.L Implement effective processes to manage f...	Local law	NC	ZAF601341663
	3.L Implement effective processes to manage f...	Local law	NC	ZAF601341672
	3.M Ensure all machinery is installed, mainta...	Local law	NC	ZAF601341669
	3.R Provide clean and secure toilets, wash ar...	Local law	NC	ZAF601341664
	3.R Provide clean and secure toilets, wash ar...	Local law	NC	ZAF601351335

← Code area 2

Code area 4 →

Systems and evidence examined to validate this code section	-OSH Expert Bedran AKBOGA - IGU-416125 contract dated 15.10.2025 , workplace physician Zeki TANTOGLU - IH-257514 contract dated 17.02.2026 -Emergency Response Plan renewed on 23.02.2026 , valid until 23.02.2032 ,Risk Analysis renewed on 11.03.2026 valid until 11.03.2032 - Periodic Inspections: Mechanical inspections were carried out by Mechanical Engineer Soner ÖAMAK. - Teamnet No: K1905110 - Contract No: 22665987 - Dated 23.10.2025. Passenger Elevator - 23.10.2025 Freight Elevator - 23.10.2025 Forklift - 23.10.2025 Water Pump - 23.10.2025 Compressor - 23.10.2025 Expansion Air Tank - 23.10.2025 Pallet Truck - 23.10.2025 Fire Installation - 23.10.2025 Electrical Controls - Electrical Engineer Saffet ÖZDEMİR - Ekipnet No: K21031216 - Contract No: 19721062 - 05.04.2025 Electrical Installation - 07.04.2025 Grounding - 07.04.2025 Lightning Protection System - 07.04.2025 Fire Extinguisher Periodic Inspection - Kıratlı Fire Extinguishing Systems - 08.01.2026 Fire Cabinet Periodic Inspection - Kıratlı Fire Extinguishing Systems - 08.01.2026 - There are a total of 29 fire cabinets, 123 fire extinguishers and 6 alarm buttons in the facility - There is a sufficient number of separated male and female toilets. During the field

← Code area 2 Code area 4 →

trip, it was observed that the toilets were clean.

- There's an infirmary room and 3 first-aid boxes.

The last whole OHS Training was carried out on 23.02.2026. Basic OHS training is given to employees upon recruitment.

- Environmental Measurements - Lighting, Thermal Comfort, Workplace Ambient Noise, Respirable Dust Exposure to Individuals, Personal Noise - Report No: 2020.ISG.461 - 11.02.2021 // Personal Noise Renewal - Report No: 146/22 - 09.03.2022

-During document reviews and interviews it's observed that facility VOC Exposure Measurement has not been carried out.

-During document reviews and interviews it's observed that H&S Committee meeting last held on 11.03.2026 and the previous meeting held on 23.07.2025. However, according to the relevant legal requirement, it should meet every 3 months.

-During document review and management interaction it's observed that there's 8 certified first-aiders in place however according to the number of employees and the relevant regulation, there must be at least 13.

-During Document review and management interaction it's observed that the facility has 15979 sqm closed usage area accordingly Business Opening and Working License; However, it's observed that there is only Building Occupancy Permit document no: 62 dated 17.12.2002 for a building area of 4802 square meters. For buildings outside this area, there is a Building Registration Certificate: Document No: 1ERH44ER Date: 06.09.2018, and Document No: 8SKPCMDR dated 07.08.2018, but there is no Building Usage Permit Certificate.

-During site tour on 16.03.2026 , fire alarm system was checked and it was determined that the alarm system was operational but could not be heard at a sufficient volume throughout the production line.

-During document review, interviews with workers and management interaction it's observed that the last fire and evacuation drill took place on 02.03.2026 . When the drill photos were checked, was seen that the number of participants in the drill was not appropriately reported in the drill report and drill participation list and the evacuation time was not reported.

← Code area 2

Code area 4 →

-It was determined through document reviews, and interviews evidence regarding the periodic inspection of fire alarm systems, which is mandatory once within a year the scope of the Regulation On Health and Safety Conditions in the Use of Work Equipment has not been found.

-During site tour and management interaction it's observed that there's 2 passenger elevator in facility however periodic control of this elevators not carried out by authorized inspection body and also periodic controls of Industrial Doors not carried out.

-During the Site Tour, it was observed that the stacking height of empty fruit crates and other packaging materials was high enough to pose a safety risk.

-During the site tour, management interviews, and employee interviews, it was understood that meals are prepared in the kitchen located within the company premises. However, no legal registration certificate for the kitchen was available.

Evidence examined to validate this code section:
-Occupational Health and Safety Rules and Instructions
-OHS Training records
-Periodic Control Reports
-Work Place Meaurements
-Accident records
-Site Tour

← Code area 2

Code area 4 →

Findings: non-compliances

ZAF601341671

Non-compliance

Due 2024-05-05

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.A Ensure a safe working environment. Put in place adequate controls to prevent accidents and injury (including long-term injury) to health arising out of, associated with, or occurring in the course of work.

Issue title

305 - No/inadequate air quality test

Description

During document reviews and interviews it's observed that facility VOC Exposure Measurement has not been carried out.

Description (carried over)

During document reviews and interviews it's observed that facility VOC Exposure Measurement has not been carried out.

Corrective and preventative actions

It is recommended to provide regularly analyze and maintain the test reports of the VOC level of the workplace environment.

Corrective and preventative actions (carried over)

It is recommended to provide regularly analyze and maintain the test reports of the VOC level of the workplace environment.

Status

Open*

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

← Code area 3

Code area 4 →

Local law reference

OCCUPATIONAL HYGIENE MEASUREMENT, TESTING AND ANALYSIS ABOUT REGULATION ARTICLE 5- (1) In order to provide a safe working environment, the employer determines the existence, quality and quantity of physical, chemical and biological hazard sources included in the risk assessment through environmental and personal exposure measurement, testing and analysis. (2) The employer repeats occupational hygiene measurements, tests and analyzes in the following cases: a) In order to evaluate the effectiveness of the control measures taken. b) When there is a change in the employee's personal exposure as a result of the workplace environment or work. c) If requested during inspections carried out by labor inspectors at the workplace. d) If deemed necessary by the workplace physician or occupational safety expert in charge of the workplace. (3) The employer is obliged to have occupational hygiene measurement, testing and analysis carried out by laboratories that have a qualification or pre-qualification certificate. Occupational hygiene measurement, test and analysis results performed by laboratories that do not have a qualification or pre-qualification certificate are invalid. (4) The employer appoints an occupational safety expert and/or workplace physician, or, in their absence, employees who are knowledgeable about the execution of the work, to accompany the laboratory personnel during the preliminary examination and measurements. (5) The employer fulfills the following obligations to obtain accurate results from occupational hygiene measurements, tests and analyses: a) Provides necessary information about the technologies used in the workplace to laboratory personnel who will perform occupational hygiene measurements, tests and analyses, and ensures that laboratory personnel meet with employee representatives and employees. b) Ensures occupational hygiene measurement, testing and analysis are carried out according to the plan prepared by the laboratory. c) It ensures that the work continues to produce real results, without making any changes in normal working conditions and production capacity. d) Provides laboratory personnel with all kinds of information and documents about the physical, chemical and biological factors to be measured, tested and analyzed in occupational hygiene in the workplace, including safety data sheets. (6) The employer keeps occupational hygiene measurement, test and analysis records in the workplace in accordance with the periods determined by the relevant legislation. For records whose retention period is not specified in the legislation, the retention period is at least 10 years.

Explanation of difference in resolution time or verification method from the SMETA issue title recommendation

It is a carried over NC. Resolution time was determined in this way during the previous audit year.

* PDF generated at 05:06 (UTC) on 23 Mar 2026. [View this finding on the Sedex platform] for live updates and closure details.

ZAF601341682 **Non-compliance** Due 2025-05-19

← Code area 3 Code area 4 →

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.D Form a health and safety committee (or include H&S in worker committees) which includes workers, and/or their representatives.

Issue title

147 - No/inadequate health and safety committee or representative(s) as required by law

Description

During document reviews and interviews it's observed that H&S Committee meeting last held on 11.03.2026 and the previous meeting held on 23.07.2025. However, according to the relevant legal requirement, it should meet every 3 months.

Description (carried over)

During document reviews and interviews it's observed that H&S Committee meeting last held on 16.09.2024 however according to the relevant legal requirement, it should meet every 3 months.

Corrective and preventative actions

It's recommended that the H&S Committee meeting held at least every 3 month.

Corrective and preventative actions (carried over)

It's recommended that the H&S Committee meeting held at least every 3 month.

Local law reference

REGULATION ON OCCUPATIONAL HEALTH AND SAFETY BOARDS ARTICLE 9 – (1) The board works in a system that requires inspection, monitoring and warning and by taking into account the following principles.

a) The boards meet at least once a month. However, the board may decide to determine this period as two months in hazardous workplaces and three months in less hazardous workplaces, taking into account the hazard class of the workplace.

Status

Open*

Time given to resolve

60 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

* PDF generated at 05:06 (UTC) on 23 Mar 2026. View this finding on the Sedex platform for live updates and closure details.

ZAF601341670

Non-compliance

Due 2024-06-04

← Code area 3

Code area 4 →

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.G Provide sufficient first-aid supplies onsite, and ensure that adequately trained personnel are available during all shifts.

Issue title

291 - First aiders in place but not enough for the size of site (including not covering all shifts)

Description

During document review and management interaction it's observed that there's 8 certified first-aiders in place however according to the number of employees and the relevant regulation, there must be at least 13.

Description (carried over)

During document review and management interaction it's observed that there's 9 certified first-aiders in place however according to the number of employees and the relevant regulation, there must be at least 13.

Corrective and preventative actions

It is recommended that a sufficient number of personnel be certified by completing first aider training and be assigned as first aider in the facility.

Corrective and preventative actions (carried over)

It is recommended that a sufficient number of personnel be certified by completing first aider training and be assigned as first aider in the facility.

Local law reference

FIRST AID REGULATION Having a first aider ARTICLE 19 – (1) Within the scope of occupational health and safety; a) In less hazardous workplaces, 1 first aider for every 20 employees, b) In hazardous workplaces, 1 first aider for every 15 employees, c) In very dangerous workplaces, it is mandatory to have 1 first aider for every 10 employees. (2) In courses where first aid training is compulsory, such as private security and driving courses, first aid training must be given by trainers who have an authorization certificate in accordance with this Regulation. (3) Within the scope of the Ministry of National Education training program, teachers who will provide first aid training are required to receive 16 hours of first aid training.

Status

Open*

Time given to resolve

60 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

* PDF generated at 05:06 (UTC) on 23 Mar 2026. View this finding on the Sedex platform for live updates and closure details.

← Code area 3

Code area 4 →

ZAF601341681

Non-compliance

Due 2025-05-19

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.K Ensure that all premises are safe and have valid safety certifications for their current layout and use. If it is currently not possible for a required license or certificate to be obtained, implement inspections by appropriate third parties to ensure building safety.

Issue title

852 - Buildings at the site have neither legal or third party certification of their safety (e.g. none of house property construction safety appraisal reports or construction acceptance reports)

Description

During Document review and management interaction it's observed that the facility has 15979 sqm closed usage area accordingly Business Opening and Working License; However, it's observed that there is only Building Occupancy Permit document no: 62 dated 17.12.2002 for a building area of 4802 square meters. For buildings outside this area, there is a Building Registration Certificate: Document No: 1ERH44ER Date: 06.09.2018, and Document No: 8SKPCMDR dated 07.08.2018, but there is no Building Usage Permit Certificate.

Description (carried over)

During Document review and management interaction it's observed that the facility has 15979 sqm closed usage area accordingly Business Opening and Working License; However, it's observed that there is only Building Occupancy Permit document no: 62 dated 17.12.2002 for a building area of 4802 square meters. For buildings outside this area, there is a Building Registration Certificate: Document No: 1ERH44ER Date: 06.09.2018, and Document No: 8SKPCMDR dated 07.08.2018, but there is no Building Usage Permit Certificate.

Corrective and preventative actions

It is recommended to obtain the Building Occupancy Permit from the local authority for total closed areas.

Corrective and preventative actions (carried over)

It is recommended to obtain the Building Occupancy Permit from the local authority for total closed areas.

Status

Open*

Time given to resolve

60 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Base code

← Code area 3

Code area 4 →

Local law reference

In accordance with Construction Zoning Law (No: 3194) (03/05/1985), (Article 30) Article 30 It's imperative to obtain permission from municipality or governership bureaus which were gave the construction permit, for a building using the absolute amount of, in case of building was totally finished or in the event of completed part of a construction which was to use. It is required to determination of building's compliance in terms of permit, additional documents and engineering, upon application of owner.

* PDF generated at 05:06 (UTC) on 23 Mar 2026. View this finding on the Sedex platform for live updates and closure details.

ZAF601341662

Non-compliance

Due 2024-05-05

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.L Implement effective processes to manage fire safety including, but not limited to, accessible evacuation routes, a fire detection system, fire fighting/suppression equipment, training and regular drills covering all shifts and warning systems.

Issue title

195 - Emergency notification system (e.g. fire alarm) is not set up to notify all workers at the site, including on multiple floors

Description

During site tour on 16.03.2026 , fire alarm system was checked and it was determined that the alarm system was operational but could not be heard at a sufficient volume throughout the production line.

Description (carried over)

During site tour on 12.03.2025, fire alarm system was checked and it was determined that the alarm system was operational but could not be heard at a sufficient volume throughout the production line.

Corrective and preventative actions

It is recommended to ensure that the alarm is audible throughout the site.

Status

Open*

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

← Code area 3

Code area 4 →

Corrective and preventative actions (carried over)

It is recommended to ensure that the alarm is audible throughout the site.

Local law reference

ABOUT FIRE PROTECTION OF BUILDINGS REGULATION Official Gazette Date: 19.12.2007 Official Gazette Number: 26735 ARTICLE 81- (1) Informing the residents of all used parts of a building about fire or similar emergencies is carried out with audible and light warning devices. In places where a fire alarm button is mandatory, a warning system is also mandatory. (5) (Amended: 10/8/2009-2009/15316 K.) Audible warning devices are placed throughout the building, measured at a height of 150 cm from the ground, and the sound level is at least 15 dBA above the average ambient sound level. In sleeping areas and bathrooms and showers, the sound level must be at least 75 dBA. Audio warning devices must have a sound level of at least 75 dBA and at most 120 dBA at a distance of 3 m. It is not necessary to install a siren system in volumes with voice alarm system speakers.

* PDF generated at 05:06 (UTC) on 23 Mar 2026. [View this finding on the Sedex platform] for live updates and closure details.

ZAF601341663

Non-compliance

Due 2024-06-04

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.L Implement effective processes to manage fire safety including, but not limited to, accessible evacuation routes, a fire detection system, fire fighting/suppression equipment, training and regular drills covering all shifts and warning systems.

Issue title

218 - Missing records of fire drills and evacuations

Description

During document review, interviews with workers and management interaction it's observed that the last fire and evacuation drill took place on 02.03.2026 . When the drill photos were checked, was seen that the number of participants in the drill was not appropriately reported in the drill report and drill participation list and the evacuation time was not reported.

Status

Open*

Time given to resolve

60 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

← Code area 3

Code area 4 →

Description (carried over)

During document review, interviews with workers and management interaction it's observed that the last fire and evacuation drill took place on 03.03.2025. When the drill photos were checked, was seen that the number of participants in the drill was not appropriately reported in the drill report and drill participation list and the evacuation time was not reported.

Corrective and preventative actions

It is recommended that drill reports and participation lists are kept appropriately.

Corrective and preventative actions (carried over)

It is recommended that drill reports and participation lists are kept appropriately.

Local law reference

REGULATION ON EMERGENCIES IN WORKPLACES Official Gazette Date: 18.06.2013 Official Gazette Number: 28681 Drill ARTICLE 13 – (1) (Amended:OG-1/10/2021-31615) In order to regularly follow the implementation steps of the prepared emergency plan and to ensure its applicability, drills are carried out, inspected and reviewed at workplaces at specified periods, provided that they do not exceed the periods specified in the second paragraph. necessary corrective and preventive measures are taken. A drill form is prepared, including the date of the drill, the deficiencies observed and the arrangements to be made in line with these deficiencies. A sample form that can be used when preparing the exercise form is included in Annex-2. (2) (Added:OG-1/10/2021-31615)(1) The exercise is carried out in accordance with the provisions of the said Regulation for workplaces within the scope of the Occupational Health and Safety Regulation in Mining Workplaces published in the Official Gazette dated 19/9/2013 and numbered 28770, and other For workplaces, it is carried out at least once a year. (3) As a result of the exercise, emergency plans are reviewed and necessary corrections are made according to the deficiencies, if any, and the experiences gained.

* PDF generated at 05:06 (UTC) on 23 Mar 2026. View this finding on the Sedex platform for live updates and closure details.

ZAF601341672

Non-compliance Due 2024-05-05

Code area	Status
3 Working conditions are safe and hygienic	Open*

← Code area 3 Code area 4 →

Workplace requirement

3.L Implement effective processes to manage fire safety including, but not limited to, accessible evacuation routes, a fire detection system, fire fighting/suppression equipment, training and regular drills covering all shifts and warning systems.

Issue title

198 - No system in place to verify functionality of smoke detectors, alarms, emergency exit signage, firefighting equipment, etc.

Description

It was determined through document reviews, and interviews evidence regarding the periodic inspection of fire alarm systems, which is mandatory once within a year the scope of the Regulation On Health and Safety Conditions in the Use of Work Equipment has not been found.

Description (carried over)

It was determined through document reviews, and interviews evidence regarding the periodic inspection of fire alarm systems, which is mandatory once within a year the scope of the Regulation On Health and Safety Conditions in the Use of Work Equipment has not been found.

Corrective and preventative actions

It is recommended to ensure that periodic inspection of Fire Detection and Warning Systems are carried out every year in accordance with legal requirements.

Corrective and preventative actions (carried over)

It is recommended to ensure that periodic inspection of Fire Detection and Warning Systems are carried out every year in accordance with legal requirements.

Local law reference

Regulation on Health and Safety Conditions in the Use of Work Equipment ANNEX-III (Amended:OG- 18/2/2022-31754) (6) ISSUES RELATED TO MAINTENANCE, REPAIR AND PERIODIC CHECKS 2.3. installations 2.3.1. Unless otherwise stated in the relevant standards, periodic checks of the installations are carried out once a year, 2.3.5. An installation project is required during periodic inspection for fire mechanical installations, fire detection and warning systems. The employer is obliged to have the installations that do not have a project designed in accordance with the Regulation on Fire Protection of Buildings and relevant standards put into effect by the Decision of the Council of Ministers dated 27/11/2007 and numbered 2007/12937. In the periodic checks of fire mechanical installations, fire detection and warning systems installations, the compliance of the installation with the project and the project's compliance with the Regulation on Fire Protection of Buildings and relevant Its compliance with the standards is evaluated.

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

← Code area 3

Code area 4 →

* PDF generated at 05:06 (UTC) on 23 Mar 2026. View this finding on the Sedex platform for live updates and closure details.

ZAF601341669

Non-compliance

Due 2024-05-05

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.M Ensure all machinery is installed, maintained, and used in a safe manner.

Issue title

267 - No/inadequate certificates for inspections of machinery, or machines not registered as required by law

Description

During site tour and management interaction it's observed that there's 2 passenger elevator in facility however periodic control of this elevators not carried out by authorized inspection body and also periodic controls of Industrial Doors not carried out.

Description (carried over)

During site tour and management interaction it's observed that there's 2 passenger elevator in facility however periodic control of this elevators not carried out by authorized inspection body and also periodic controls of Industrial Doors not carried out.

Corrective and preventative actions

It is recommended to complete periodic control of industrial doors.

Corrective and preventative actions (carried over)

It is recommended to complete periodic control of industrial doors.

Status

Open*

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

← Code area 3

Code area 4 →

Local law reference

← Code area 3

Code area 4 →

ELEVATOR PERIODIC CONTROL REGULATION Official Gazette Date: 04.05.2018 Official Gazette Number: 30411 ARTICLE 8 – (1) Periodic control of the elevator used continuously in the building/structure is carried out at least once a year by a type A Inspection Organization authorized by the Ministry and signing a protocol with the relevant administration. (4) The obligation to carry out periodic control belongs to the relevant administration and building responsible. REGULATION ON HEALTH AND SAFETY CONDITIONS IN THE USE OF WORK EQUIPMENT ARTICLE 7 – (Amended with Title:OG-18/2/2022-31754) (1) The following points are observed regarding the periodic control of work equipment used in the workplace: a) In cases where the safety of the work equipment depends on the installation and assembly conditions, periodic checks of the equipment are carried out by persons authorized to carry out periodic checks, after the equipment is installed and before it is used for the first time , after important maintenance and repairs and at every location change. Work equipment that can be upgraded or modified after the initial installation, such as scaffolds, columnar working platforms or tower cranes, are periodically checked by persons authorized to perform periodic checks, including the changes made to the work equipment after the upgrade or modification. b) The employer must ensure that work equipment that may be dangerous by being exposed to effects that may cause malfunction; 1) Periodic checks are carried out by persons authorized to carry out periodic checks, 2) After situations that may cause deterioration in the safety of work equipment, such as changes in the way of operation, accidents, natural events or long-term disuse of the equipment, necessary periodic checks are carried out by persons authorized to carry out periodic checks in order to identify and eliminate the malfunction in a timely manner and to protect health and safety conditions, is provided. c) Periodic control results are recorded by the employer with wet signatures and stored appropriately to be shown whenever the authorities request. Records signed with a secure electronic signature and stored electronically in accordance with the Electronic Signature Law No. 5070 dated 15/1/2004 are also valid. (2) When mobile work equipment that is not subject to installation and assembly conditions is used outside the enterprise, the report regarding the last periodic control is kept with the equipment. (3) At least the equipment or equipment groups listed in the tables in ANNEX-III are subject to periodic control. The conditions regarding the performance of periodic controls and the procedures and principles regarding the documents to be issued as a result of the periodic control are specified in ANNEX-III. Periodic checks of the equipment covered by the equipment group and which do not have a standard equivalent in the relevant table are carried out according to the hierarchy in articles 1.1 and 1.4 of ANNEX-III. (4) Employer; Makes or has preliminary preparations made for the periodic checks of work equipment specified by persons authorized to carry out periodic checks. If requested by the person authorized to perform periodic control, it ensures that the authorized service of the equipment supervises the periodic control activities. (5) Periodic control reports must include the EKIPNET registration number of the person performing the periodic control. (6) (Added:OG-4/2/2024-32450) A contract in accordance with the sample in the OHS-KATIP system is drawn up and mutually signed between the employer and the person authorized to perform periodic control, at least 1 day before the periodic control service is carried out. 2.5. Industrial shelving and doors 2.5.1. Periodic checks of industrial shelves and doors are authorized; It is carried out by mechanical engineers, mechatronics engineers, civil engineers, technical teachers graduated from the construction, machinery and metal education department,

← Code area 3

Code area 4 →

construction or machinery technicians or higher technicians. 2.5.2. Non-destructive testing methods can be used for periodic checks of industrial shelves and doors. Reports of non-destructive examinations are kept as an annex to the periodic control report. 2.5.3. Periodic control criteria and control periods of industrial shelves and doors are stated in Table-5. Table-5: Periodic control times and control criteria of industrial shelves and doors industrial doors 1 Year if the period is not specified in the standards It is done in accordance with the criteria specified in TS EN 13241+A2, TS EN 12453, TS EN 12604+A1 standards.

* PDF generated at 05:06 (UTC) on 23 Mar 2026. View this finding on the Sedex platform for live updates and closure details.

ZAF601341664

Non-compliance

Due 2024-06-04

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.R Provide clean and secure toilets, wash areas, and worker changing facilities, with adequate hygiene supplies separated by gender or with effective privacy. Ensure potable water is easily accessible by workers and, where appropriate, clean storage facilities for food and personal belongings.

Issue title

327 - Storage of goods not in line with legal requirements (e.g. too high)

Description

During the Site Tour, it was observed that the stacking height of empty fruit crates and other packaging materials was high enough to pose a safety risk.

Description (carried over)

During the Site Tour, it was observed that the stacking height of empty fruit crates and other packaging materials was high enough to pose a safety risk.

Corrective and preventative actions

It is recommended that warehouse stack heights be organized in a way that does not pose a safety risk.

Corrective and preventative actions (carried over)

It is recommended that warehouse stack heights be organized in a way that does not pose a safety risk.

Status

Open*

Time given to resolve

60 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

← Code area 3

Code area 4 →

Local law reference

In accordance with the Occupational Health and Safety Law (30/6/2012), article 5: The following principles are taken into account in fulfilling the employer's obligations: a) Avoiding risks. b) Analyzing risks that cannot be avoided. c) Fighting risks at their source. d) Design of workplaces and work equipment, work equipment to make the work suitable for people To be careful in the selection of shape and production methods, especially to prevent the negative effects of monotonous working and production tempo on health and safety, and if it cannot be prevented, to minimize it.

Evidence

NC.Storage.jpeg

* PDF generated at 05:06 (UTC) on 23 Mar 2026. View this finding on the Sedex platform for live updates and closure details.

ZAF601351335

Non-compliance

Due 2026-05-22

Code area	Status
3 Working conditions are safe and hygienic	Open*

← Code area 3

Code area 4 →

Workplace requirement

3.R Provide clean and secure toilets, wash areas, and worker changing facilities, with adequate hygiene supplies separated by gender or with effective privacy. Ensure potable water is easily accessible by workers and, where appropriate, clean storage facilities for food and personal belongings.

Issue title

336 - Canteen provided is insufficient to meet legal requirements and/or worker needs

Description

During the site tour, management interviews, and employee interviews, it was understood that meals are prepared in the kitchen located within the company premises. However, no legal registration certificate for the kitchen was available.

Corrective and preventative actions

It is recommended that the legal registration certificate for the kitchen be obtained.

Local law reference

Regulation on Registration and Approval Procedures of Food Businesses ARTICLE 2 The first paragraph of Article 6 of the same Regulation has been amended as follows: “(1) Warehouse, retail, and mass consumption businesses apply to the authorized authority with the information and documents in Annex 2; food producing businesses apply with the information and documents in Annex 3, either with a wet signature or electronically with an electronic signature.” ARTICLE 3 The first paragraph of Article 8 of the same Regulation has been amended as follows: “(1) Food business operators apply to the authorized authority with the information and documents specified in Annex 7 of this Regulation, either with a wet signature or electronically with an electronic signature, in order to obtain approval for their businesses subject to approval.”

Time given to resolve

60 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

* PDF generated at 05:06 (UTC) on 23 Mar 2026. View this finding on the Sedex platform for live updates and closure details.

← Code area 3

Code area 4 →

3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, senior manager or business owner Yes, qualified safety officer
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	Yes Facility has fruit washing units, chemicals used in production purposes.
Who organises accommodation for workers?	The company owns or operates worker accommodation (onsite)
Who organises worker transportation between accommodation and worksite?	Workers organise their own transport
Who organises worker transportation while at work?	Site owned transport Other third party contracted by the site
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	No During Document review and management interaction it's observed that the facility has 15979 sqm closed usage area accordingly Business Opening and Working License; However, it's observed that there is only Building Occupancy Permit document no: 62 dated 17.12.2002 for a building area of 4802 square meters. For buildings outside this area, there is a Building Registration Certificate: Document No: 1ERH44ER Date: 06.09.2018, and Document No: 8SKPCMDR dated 07.08.2018, but there is no Building Usage Permit Certificate.
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No

← Code area 3 Code area 4 →

Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No
Does the site have a structural engineer evaluation?	No

4. Child labour shall not be used

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Fundamental Improvements Required
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Fundamental Improvements Required
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required

← Code area 3

Code area 5 →

Management systems

Explanation for management systems grades	-Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met: Facility has Social Responsibility Policy 21.05.2019. Social responsibility policy already mentiones Child Labour Prevention and Recruitment . However, it is recommended that detailed procedures for Child Labour Prevention and Recruitment be established and followed. Documentation created and refer national regulations however facility shall create a suitable system for the publication, control and revision of documents and facility has more detailed policies and procedures to determined recruitment conditions. -Appoint a manager with sufficient seniority who is responsible for implementing procedures: Bihter Isyaran is in charge of reviewing and implementing standards of human rights,she's also responsible of Quality Assurance and SCR. HR department checked age verification for all workers before job started. Production planning responsible arrange the working time, OT etc. however all responsible shall be detailed information about young workers' working conditions, working hours, OT requirements, health check of young workers and improve the workplace conditions for young workers., NCs raised about young worker working hours and health checks, management shall create a proper system and make an effort to comply to the legal obligations about young workers. -Communicate and train employees and other workers, 05.01.2026 dated training records available ,training topics included recruitment conditions, ETI Base Code, freedom of association, forced labor, wages and benefits, working hours, workplace rules, discrimination , preventation of child labor, age verification systems etc. Workers and responsible shall be trained about young workers working conditions in details. NC regarding the working hours and health screenings of young employees' was identified during the audit. The training provided must include information on the working hours of young employees -Monitor the effectiveness of procedures to meet policy and Workplace Requirements: Facility monitors ages of workers, DOBs , worker list, working conditions of workforce. Facility shall create a proper system to monitor training effectiveness about child labor, age verification system and working conditions of young workers for all relevant. During the audit, it was observed that Young Employees were working overtime and health screenings were not done on time. It is recommended that the company improve its monitoring in these areas.

← Code area 3

Code area 5 →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
4. Child labour shall not be used	4.C Ensure that workers under 18 (but above l...	Local law	NC ZAF601341674
	4.C Ensure that workers under 18 (but above l...	Local law	NC ZAF601341684

← Code area 3

Code area 5 →

Systems and evidence examined to validate this code section	-Facility has Social Responsiblity Policy date 21.05.2019 - The youngest worker is 16 years old. No record of employment/working of workers below the legal working age has been identified. The legal minimum age is 15 years old, there's no worker under the age of legal minimum or young worker. - The facility has established a practice that they will never employ and use any child labor. - The facility verifies all workers' original national ID card, birth certificate etc. at the time of recruitment and keeps the photocopies of workers' ID cards, birth certificate in their personal files. - Employees' personal files was taken for review. Each employee file included a bio data sheet, recent photo, birth registration certificate / photocopied national identification card and other document -3-month time and payment records of the young workers sampled during the audit were checked for the months of October 2025 , December 2025 and February 2026 , It was observed from document review, worker interview & management interaction that sampled young workers worked overtime beyond the regular working hours of 8 hours a day (minimum 1 hour, maximum 5,5 hours/day) and accordingly their weekly working hours exceeded 40 hours and daily working hours exceeded 8 hours; and it has been determined that weekly holidays are not 40 uninterrupted hours. -During document reviews and interviews it's observed that health screening for young workers is not done every 6 months. Evidence examined to validate this code section -Social Responsiblity Policy date 21.05.2019 -Social Compliance Training records dated 05.01.2026. -Worker Interviews -ID cards. -Management Interactions -26 selected workers' personnel files, contracts, working hours records and wage slips

← Code area 3

Code area 5 →

Findings: non-compliances

ZAF601341674

Non-compliance

Due 2024-06-04

Code area

4 Child labour shall not be used

Workplace requirement

4.C Ensure that workers under 18 (but above legal minimum age) only carry out age appropriate, non-hazardous work that is properly supervised. Ensure these workers do not work night shifts, and comply with other relevant laws on young workers' employment (e.g. obtaining permits or permission from parents, ensuring apprenticeships are properly registered and supervised).

Issue title

400 - Instances of workers over the legal minimum age but under 18 working at night

Description

3-month time and payment records of the young workers sampled during the audit were checked for the months of October 2025 , December 2025 and February 2026 , It was observed from document review, worker interview & management interaction that sampled young workers worked overtime beyond the regular working hours of 8 hours a day (minimum 1 hour, maximum 5,5 hours/day) and accordingly their weekly working hours exceeded 40 hours and daily working hours exceeded 8 hours; and it has been determined that weekly holidays are not 40 uninterrupted hours.

Description (carried over)

3-month time and payment records of the young workers sampled during the audit were checked for the months of October 2024, December 2024 and February 2025, It was observed from document review, worker interview & management interaction that sampled young workers worked overtime beyond the regular working hours of 8 hours a day (minimum 1 hour, maximum 4,5 hours/day) and accordingly their weekly working hours exceeded 40 hours and daily working hours exceeded 8 hours; and it has been determined that weekly holidays are not 40 uninterrupted hours.

Corrective and preventative actions

It is recommended to ensure compliance with the relevant legal requirements regarding the working hours and rest periods of Young Workers.

Status

Open*

Time given to resolve

60 days

Verification method

Follow up audit

Area of non-compliance/non-conformance

Local law

← Code area 4

Code area 5 →

Corrective and preventative actions (carried over)

It is recommended to ensure compliance with the relevant legal requirements regarding the working hours and rest periods of Young Workers.

Local law reference

REGULATION ON PROCEDURES AND PRINCIPLES OF EMPLOYMENT OF CHILD AND YOUNG WORKERS Official Gazette Date: 06.04.2004 Official Gazette Number: 25425 Working Times and Rest Periods Article 6 - Working hours of children who have completed their basic education and are not attending school cannot exceed seven hours a day and thirty-five hours a week. However, for children over the age of 15, this time can be increased to eight hours a day and forty hours a week. Daily working hours of child and young workers are applied within a twenty-four hour period, taking into account an uninterrupted fourteen-hour rest period. The working hours of children attending school during the education period can be a maximum of two hours a day and ten hours a week, outside of educational hours. During periods when the school is closed, working hours cannot exceed the working hours specified in the first paragraph. It is mandatory to take a thirty-minute break for jobs lasting more than two hours and less than four hours, and a one-hour break in the middle of the working period for jobs lasting from four hours to seven and a half hours. Situations Counting as Daily Working Time Article 7 - In addition to the situations counted as working time according to Article 66 of the Labor Law No. 4857; a) The periods spent in the training that the employer must provide, b) The time spent in courses and meetings sent by the employer outside the workplace and the time spent in vocational training programs organized by authorized institutions and organizations, c) Periods during which they cannot continue their work due to participating as representatives in conferences, congresses, commissions and similar meetings organized by national and international institutions and organizations regarding working children and young people, is counted as working time. Week Break Article 8 - Week holiday leave of child and young workers cannot be less than forty hours uninterrupted. In addition, the weekly holiday fee is paid without any work in return.

* PDF generated at 05:06 (UTC) on 23 Mar 2026. View this finding on the Sedex platform for live updates and closure details.

ZAF601341684

Non-compliance

Due 2025-04-19

Code area	Status
4 Child labour shall not be used	Open*

← Code area 4

Code area 5 →

Workplace requirement

4.C Ensure that workers under 18 (but above legal minimum age) only carry out age appropriate, non-hazardous work that is properly supervised. Ensure these workers do not work night shifts, and comply with other relevant laws on young workers' employment (e.g. obtaining permits or permission from parents, ensuring apprenticeships are properly registered and supervised).

Issue title

401 - No health examination for young workers as per legal requirement

Description

During document reviews and interviews it's observed that health screening for young workers is not done every 6 months.

Description (carried over)

During document reviews and interviews it's observed that health screening for young workers is not done every 6 months.

Corrective and preventative actions

It's recommended that the health check for young workers to be done once every 6 months

Corrective and preventative actions (carried over)

It's recommended that the health check for young workers to be done once every 6 months

Local law reference

ABOUT THE DUTIES, AUTHORITIES, RESPONSIBILITIES AND TRAINING OF OCCUPATIONAL PHYSICIANS AND OTHER HEALTH PERSONNEL REGULATION Article 9 Clause 3: In line with the results of the risk assessment carried out in the workplace with international standards, primarily taking into account the personal characteristics of the employee, the hazard class of the workplace and the nature of the work; Periodically the health examination is repeated, at least once every five years for jobs in the less hazardous class, once every three years at the latest for jobs in the hazardous class, once a year at the latest for jobs in the very dangerous class, once every six months at the latest for children, young people and pregnant workers who are in the group that requires a special policy. However, these periods are shortened if deemed necessary by the workplace physician.

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

* PDF generated at 05:06 (UTC) on 23 Mar 2026. [View this finding on the Sedex platform] for live updates and closure details.

← Code area 4

Code area 5 →

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	36%
Enter the legal age of employment	15
Enter the age of the youngest worker identified	16
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0.0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	Not Applicable

← Code area 4

Code area 5 →

5. Legal wages are paid

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Fundamental Improvements Required
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Fundamental Improvements Required
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required

← Code area 4

Code area 5.A →

Management systems

Explanation for management systems grades	-Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met:cility has Social Responsibility Policy 21.05.2019 and it is also mentones Wage and Benefits Documentation created and refer national regulations however facility shall create a suitable system for the publication, control and revision of documents. -Appppoint a manager with sufficient seniority who is responsible for implementing procedures: Bihter Isyaran is in charge of reviewing and implementing standards of human rights,she's also responsible of Quality Assurance and SCR. Multiple job descriptions and lack of some outline of roles and responsibilities. HR department and production planning responsible arrange the working time, OT etc. A clear documented matrix and description is needed to ensure accountability in implementing policies and procedures. Senior management shall make an active decision about paying workers' social security insurance as required by law and keep complete and verifiable time records and wage records -Communicate and train employees and other workers: Training records dated 05.01.2026 are available; training topics included recruitment conditions, ETI Base Code, freedom of association, forced labor, wages and benefits, working hours, workplace rules, and discrimination. However, a more detailed training plan is required, and additional, in-depth training is necessary for those responsible for the implementation of policies and procedures. Responsible personnel shall be specifically trained on ensuring that workers’ social security insurance is paid in accordance with legal requirements and that complete, accurate, and verifiable time and wage records are maintained. Fundamental improvements are required, as current training and implementation practices are not sufficient to ensure full understanding, consistency, -Monitor the effectiveness of procedures to meet policy and Workplace Requirements: The facility shall monitor that all Social Security Insurance payments are made in line with workers’ legal entitlements and maintain complete, accurate, and verifiable time and wage records. Fundamental improvements are required, as current practices are insufficient to ensure full compliance, transparency, and proper verification of these obligations.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

← Code area 4

Code area 5.A →

5. Legal wages are paid	5.A Ensure that all workers (including non-em...	Local law	NC	ZAF601341667
	5.B Ensure that workers receive the insurance...	Local law	NC	ZAF601341673

Systems and evidence examined to validate this code section	-Facility has Social Responsiblity Policy 21.05.2019 -Disciplinary Procedure dated 21.05.2019. -Working Conditions Policy dated 01.03.2021 . - 12 months' wage records were available for the auditor's review. 3 months; October 2025, December 2025, February 2026 were selected for review. Payments of production workers are calculated as daily and are paid monthly. - All the workers are paid at least the legal minimum wage. The legal minimum wage for 2026 is NET 28.075,50 TRY and GROSS 33.030,00 TRY Through review of worker interviews, worker representative interviews, management interviews, and payroll records controlled. Wages for the month of October 2025 , December 2025 , February 2026 were verified, all sampled full-time workers received at least Net 28.075,50 TRY which equal to the legal minimum wage of Turkey in 2025. Seasonal workers called for work approximately 15 days on normal months and 20-25 days for pick seasons. All seasonal workers received a daily legal minimum for their working days. -Employment contracts are based on a monthly wage (30 days). However, employees are paid according to the actual number of days worked. Employees are entitled to one paid rest day after six consecutive working days (6+1 system). This practice is in line with the Turkish Labour Law No. 4857, Article 46, which stipulates that employees who work for six days are entitled to a minimum of 24 hours uninterrupted weekly rest with payment. -Paylips are ensured for each employee on a monthly basis in their language (Turkish) .-The facility did not paid any workers as in-kind benefits, all workers are paid as money incomes for their works. -That facility comply with the standard requirements to no deduction from workers pay is for disciplinary sanctions. -The facility management provided the trainings during working hours, -The facility provided all workers with clearly written information, in a language workers understand, outlining wage information before employment begins, and with clearly written information relating to any changes of the same during employment. -During the audit it was observed from document review, Worker interview & management interaction, time and payment records for 3 months were sampled February 2026 (Last Payment Month), December 2025 (Peak Month), October 2025

(Random Month) for 26 workers and it's observed that; Participation lists were created for workers, these lists were distributed to services and workers signed at the services. In addition, the entry and exit records of the employees are kept by the management with the Scorecard Excel, and overtime and routine working hours are not recorded as entry-exit exact hours, the total hours worked are recorded. Accordingly, wages could not be fully verified during the audit.

-It was noted by document review, 26 sampled workers time and wage records were reviewed for selected months October 2025 , December 2025 and February 2026 ,management and worker interviews that all the legal minimum wages and overtime wages up to 20 hours are paid through bank and rest of the overtime payments does through cash. Also, only legal minimum wage amounts and overtime wages of up to 20 hours are declared to Social Security Institution. Rest of wages (overtime wages) and taxes are not declared to Social Security Institution.

Evidence examined to validate this code section
-Facility has Social Responsiblity Policy 21.05.2019
-Disciplinary Procedure dated 21.05.2019.
-Working Conditions Policy dated 01.03.2021 .
-Social Compliance Training records dated 05.01.2026
-Worker Interviews,
-Health check records.
-Management Interactions
-26 selected workers' personnel files, contracts, working hours records and wage slips

← Code area 4

Code area 5.A →

Findings: non-compliances

ZAF601341667

Non-compliance

Due 2024-06-04

Code area

5 Legal wages are paid

Workplace requirement

5.A Ensure that all workers (including non-employee workers) are paid at least the legal minimum wage or legally recognised collective bargaining agreement (CBA) where one exists, whichever is higher.

Issue title

406 - Unable to verify wages due to missing/incomplete/inconsistent/inaccurate records

Description

During the audit it was observed from document review, Worker interview & management interaction, time and payment records for 3 months were sampled February 2026 (Last Payment Month), December 2025 (Peak Month), October 2025 (Random Month) for 26 workers and it's observed that; Participation lists were created for workers, these lists were distributed to services and workers signed at the services. In addition, the entry and exit records of the employees are kept by the management with the Scorecard Excel, and overtime and routine working hours are not recorded as entry-exit exact hours, the total hours worked are recorded. Accordingly, wages could not be fully verified during the audit.

Description (carried over)

During the audit it was observed from document review, Worker interview & management interaction, time and payment records for 3 months were sampled February 2025 (Last Payment Month), December 2024 (Peak Month), October 2024 (Random Month) for 26 workers and it's observed that; Participation lists were created for workers, these lists were distributed to services and workers signed at the services. In addition, the entry and exit records of the employees are kept by the management with the Scorecard Excel, and overtime and routine working hours are not recorded as entry-exit exact hours, the total hours worked are recorded. Accordingly, wages could not be fully verified during the audit.

Corrective and preventative actions

It is recommended to keep complete and verifiable time records and wage records of workers' regular and overtimes.

Status

Open*

Time given to resolve

60 days

Verification method

Follow up audit

Area of non-compliance/non-conformance

Local law

← Code area 5

Code area 5.A →

Corrective and preventative actions (carried over)

It is recommended to keep complete and verifiable time records and wage records of workers' regular and overtimes.

Local law reference

Labor Law Law Number: 4857 Article 37 - In payments made at the workplace or to the bank, the employer must give the employee a signed note showing the wage calculation or bearing the special sign of the workplace. In this note, the date of payment and the period it relates to, as well as the amount of all kinds of additions to the main wage such as overtime, week holidays, holiday and general holiday wages, and all kinds of deductions such as taxes, insurance premiums, advance deductions, alimony and enforcement, must be shown separately.

Evidence

[NC.Working Hours.Eren Tarım.pdf]

* PDF generated at 05:06 (UTC) on 23 Mar 2026. [View this finding on the Sedex platform] for live updates and closure details.

ZAF601341673

Non-compliance

Due 2024-06-04

Code area	Status
5 Legal wages are paid	Open*

← Code area 5

Code area 5.A →

Workplace requirement

5.B Ensure that workers receive the insurances and benefits (including leave entitlements) they are legally or contractually entitled to.

Issue title

423 - Compulsory insurance (e.g. social insurance, accident insurance etc.) not paid - systemic

Description

It was noted by document review, 26 sampled workers time and wage records were reviewed for selected months October 2025 , December 2025 and February 2026 ,management and worker interviews that all the legal minimum wages and overtime wages up to 20 hours are paid through bank and rest of the overtime payments does through cash. Also, only legal minimum wage amounts and overtime wages of up to 20 hours are declared to Social Security Institution. Rest of wages (overtime wages) and taxes are not declared to Social Security Institution.

Description (carried over)

It was noted by document review, 26 sampled workers time and wage records were reviewed for selected months October 2024, December 2024 and February 2025 ,management and worker interviews that all the legal minimum wages and overtime wages up to 20 hours are paid through bank and rest of the overtime payments does through cash. Also, only legal minimum wage amounts and overtime wages of up to 20 hours are declared to Social Security Institution. Rest of wages (overtime wages) and taxes are not declared to Social Security Institution.

Corrective and preventative actions

It is recommended that all the wages are declared to Social Security Institution and paid by bank transfer.

Corrective and preventative actions (carried over)

It is recommended that all the wages are declared to Social Security Institution and paid by bank transfer.

Local law reference

In accordance with Social Insurance and General Health Insurance Law; #5510/2006, Rev: 08.05.2008, Art. 80. All the compensations are declared to Social Security Institution.

Time given to resolve

60 days

Verification method

Follow up audit

Area of non-compliance/non-conformance

Local law

* PDF generated at 05:06 (UTC) on 23 Mar 2026. View this finding on the Sedex platform for live updates and closure details.

← Code area 5

Code area 5.A →

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	The legal minimum wage Wages are based on job skills and experience
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Mix of digital and other payment methods (give details) Facility uses bank transfer and cash payments.
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	None
Where the site has undertaken a Living Wage gap analysis against a credible Benchmark which Benchmark have they used?	Not Applicable

Worker renumeration

Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers?	Not applicable

Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Daily Monthly
Is actual wage data available on site for any of these options?	Daily Monthly

← Code area 5 Code area 5.A →

Maximum legal working hours	**Max hours per day**	11.0
	Max hours per week	45.0
	Max hours per month	Non applicable
Actual required working hours	**Required hours per day**	8.0
	Required hours per week	45.0
	Required hours per month	225.0
Maximum legal overtime hours	**Max hours per day**	Non applicable
	Max hours per week	Non applicable
	Max hours per month	Non applicable
Actual overtime hours	**Max hours per day**	8.0
	Max hours per week	40.0
	Max hours per month	72.0
Minimum legal wage	**Min per hour**	Non applicable
	Min per day	935.85
	Min per week	Non applicable
	Min per month	28075.5
Actual minimum wage	**Actual per hour**	Non applicable
	Actual per day	1065.67
	Actual per week	7459.67
	Actual per month	31970.0

← Code area 5 Code area 5.A →

Minimum legal overtime wage	**Min per hour**	187.17
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum overtime wage	**Actual per hour**	137.3
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	Non applicable

Wage analysis

Number of workers' records checked	78
Provide the date and details of the records	-26 samples for October 2025 (Random month time-wage records) - 26 samples for December 2025 (Peak Month time-wage records) - 26 samples for February 2026 (Last Month time-wage records)
Are there different legal minimum/ legally recognised CBAs wage grades?	No
For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?	Meets legal minimum
Indicate the breakdown of workforce per earnings	For selected 26 workers; -100% meets legal minimum
Are there any bonus schemes used?	No

← Code area 5

Code area 5.A →

Were accurate records shown at the first request?	Yes
Were any inconsistencies found?	No

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
5.A. Living wages are paid	5.A.A Review workers' total pay including ben...	Base code	NC ZAF601351336
	5.A.B Put in place a wage improvement plan th...	Base code	NC ZAF601351337

Systems and evidence examined to validate this code section	During document reviews and interviews, it's observed that there's no Living Wage calculation on site. During document reviews and interviews it's observed that there's no Living Wage Calculation, based on that there's no improvement plan completed.

← Code area 5

Code area 6 →

Findings: non-compliances

ZAF601351336

Non-compliance

Code area

5.A Living wages are paid

Workplace requirement

5.A.A Review workers' total pay including benefits and compare it with a credible 'living wage' to calculate a 'living wage gap', and understand what proportion of the workforce has a gap.

Issue title

903 - CAR: A living wage gap analysis has not been completed

Description

During document reviews and interviews, it's observed that there's no Living Wage calculation on site.

Status

Open*

Time given to resolve

Verification method

Collaborative action required

Area of non-compliance/non-conformance

Base code

Corrective and preventative actions

It's recommended that the Living Wage analysis completed.

* PDF generated at 05:06 (UTC) on 23 Mar 2026. View this finding on the Sedex platform for live updates and closure details.

ZAF601351337

Non-compliance

Code area

5.A Living wages are paid

Workplace requirement

5.A.B Put in place a wage improvement plan that aims to pay workers a living wage within a stated timeframe.

Issue title

905 - CAR: A wage improvement plan (with Living Wage as the goal) has not been completed

Description

During document reviews and interviews it's observed that there's no Living Wage Calculation, based on that there's no improvement plan completed.

Status

Open*

Time given to resolve

Verification method

Collaborative action required

Area of non-compliance/non-conformance

Base code

← Code area 5.A

Code area 6 →

Corrective and preventative actions

It's recommended that the Living Wage Calculation and after that improvement plan completed.

* PDF generated at 05:06 (UTC) on 23 Mar 2026. View this finding on the Sedex platform for live updates and closure details.

6. Working hours are not excessive

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Fundamental Improvements Required
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Fundamental Improvements Required
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required

← Code area 5.A

Code area 7 →

Management systems

Explanation for management systems grades	-Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met: Facility has Social REsponsiblity Policy: 21.05.2019 dated and Working Conditions Policy dated 01.03.2021. . Facility also determined the working hours in announcement boards and contracts of personnels. Documentation created and refer national regulations however facility shall create a suitable system for the publication, control and revision of documents. -Apoint a manager with sufficient seniority who is responsible for implementing procedures: Bihter Isyaran is in charge of reviewing and implementing standards of human rights,she's also responsible of Quality Assurance and SCR HR department and production planning responsible arrange the working time, OT etc. A clear documented matrix and description is needed to ensure accountability in implementing policies and procedures. The company has failed regarding overtime hours and payments. It is recommended that the management improves itself in this regard. Communicate and train employees and other workers: Training records dated 05.01.2026 are available; training topics included recruitment conditions, ETI Base Code, freedom of association, forced labor, wages and benefits, working hours, workplace rules, and discrimination. However, a detailed training plan is required, and more comprehensive training is needed for those responsible for the implementation of policies and procedures. This includes addressing the company's NCs related to working hours and implementing preventive measures to avoid recurrence. Fundamental improvements are required, as the current training framework is not sufficient to ensure effective implementation, consistency, and full compliance. -Monitor the effectiveness of procedures to meet policy and Workplace Requirements: The company has failed regarding overtime hours and payments, facility shall be ensure for all workers' overtime hours and operational planning carried out in line with legal requirements for on-going basis. Payment for overtime work shall be made in accordance with legal requirements.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

← Code area 5.A

Code area 7 →

6. Working hours are not excessive	6.A Ensure working hours (including overtime)...	Local law	NC	ZAF601341666
	6.A Ensure working hours (including overtime)...	Local law	NC	ZAF601341677
	6.B Ensure workers receive all legally requir...	Local law	NC	ZAF601341678
	6.C Provide workers with at least 24 hours of...	Local law	NC	ZAF601341679
	6.D Ensure that working hours do not exceed 6...	Base code	NC	ZAF601341680
	6.D Ensure that working hours do not exceed 6...	Base code	NC	ZAF601341685
	6.F Ensure that where overtime is used, it is...	Local law	NC	ZAF601341675
	6.H Ensure that overtime is always compensate...	Local law	NC	ZAF601341676

← Code area 5.A

Code area 7 →

Systems and evidence examined to validate this code section	-The company has Social REsponsiblity Policy: 21.05.2019 Dated -The company has Working Conditions Policy dated 01.03.2021 -The facility uses a manual recording for working hours. -Facility works single shift. -All departments work between 08:00-17:30 (with 90 minutes break), Generally, working days are Monday Saturday, but weekly rest days may vary depending on production planning. -Weekly total working hours is 45 and it's in line with legal requirements, regular daily hours not exceeding the 11 hours and it's in line with legal requirements. -Based on document reviews, and interviews with workers it's seen that overtime is voluntary. -During the audit it was observed from document review, Worker interview & management interaction, time and payment records for 3 months were sampled February 2026 (Last Payment Month), December 2025 (Peak Month), October 2025 (Random Month) for 26 workers and it's observed that; Participation lists were created for workers, these lists were distributed to services and workers signed at the services. In addition, the entry and exit records of the employees are kept by the management with the Scoreboard Excel, and overtime and routine working hours are not recorded as entry-exit exact hours, the total hours worked are recorded. -During document review and management and worker interviews it's observed that; 21 (selected from various departments) out of 26 sample population worked more than 11 hours per day (i.e. 12:00 hr to 13:00 hrs) in February 2026. 22 (selected from various departments) out of 26 sample population worked more than 11 hours per day (i.e. 11:30 hr to 15:30 hrs) in December 2025 . (selected from various departments) 21 out of 26 sample population worked more than 11 hours per day (i.e. 12:00 hr to 13:30 hrs) in October 2025. -During document review and management and worker interviews it's observed that; 10 (selected from various departments) out of 26 sample in October 2025 , 6 (selected from various departments) out of 26 sample population in December 2025 and 4 (selected from various departments) in February 2026 worked at least one day without rest for at at least eleven hours during shift changes -During document review and management and worker interviews it's observed that;

[← Code area 5.A] [Code area 7 →]

13 (selected from various departments) out of 26 sample in February 2026 worked (min 7 to maximum 13 days continuously), 14 workers worked continuously without a week break in December 2025 (from 7 days to 17 days), 13 workers worked continuously without a week break in October 2025 (from 8 days to 22 days)

-During document reviews and interviews and control of 26 of 26 workers time records for February 2026 , December 2025 and October 2025 it's observed that the 12 workers exceed total 72 working hours in a week (min 74,5 max 85 hours) in December 2025)

-During document reviews and interviews and control of 26 of 26 workers time records for February 2026 , December 2025 and October 2025 it's observed that the 4 workers exceed total 60 working hours in a week (min 61,5-max 68 hours) in October 2025 , 8 workers exceed total 60 working hours in a week (Minimum 62,5 hours, maximum 67 hours) in December 2025; 5 workers exceed total 60 working hours in a week (Minimum 62 hours, maximum 65,5 hours) in February 2026..

-During working hours records review, interviews with management and workers it was identified that the workers have worked more than 270 hours overtime per year. 3 (selected from various departments) out of 26 sample population employees worked in excess of 270 hours overtime per year in 2025(i.e. 283,5 hours to 300 hours overtime in 2025).

-During document reviews, interviews and management interaction it's observed that; Payment and time records of 26 workers for the months of October 2025 , December 2025 and February 2026 were checked; Accordingly, it was seen that in , Overtime payments were paid with the (Minimum wage/30 days/8 hours*1) account. Overtime payments are not paid as 150% OT premium.

Evidence examined to validate this code section
:-Social REsponsiblity Policy: 21.05.2019 Dated
-Working Conditions Policy dated 01.03.2021
-Social Compliance Training records dated 05.01.2026.
-Worker Interviews,
-Management Interactions
-26 selected workers' personnel files, contracts, working hours records and wage slips

← Code area 5.A

Code area 7 →

Findings: non-compliances

ZAF601341666

Non-compliance

Due 2024-06-04

Code area

6 Working hours are not excessive

Workplace requirement

6.A Ensure working hours (including overtime) are accurately recorded, and do not exceed legal limits or limits in collective bargaining agreements, whichever gives more protection for workers.

Issue title

463 - Unable to verify working hours due to missing/ incomplete/ inconsistent records

Description

During the audit it was observed from document review, Worker interview & management interaction, time and payment records for 3 months were sampled February 2026 (Last Payment Month), December 2025 (Peak Month), October 2025 (Random Month) for 26 workers and it's observed that; Participation lists were created for workers, these lists were distributed to services and workers signed at the services. In addition, the entry and exit records of the employees are kept by the management with the Scoreboard Excel, and overtime and routine working hours are not recorded as entry-exit exact hours, the total hours worked are recorded.

Description (carried over)

During the audit it was observed from document review, Worker interview & management interaction, time and payment records for 3 months were sampled February 2025 (Last Payment Month), December 2024 (Peak Month), October 2024 (Random Month) for 26 workers and it's observed that; Participation lists were created for workers, these lists were distributed to services and workers signed at the services. In addition, the entry and exit records of the employees are kept by the management with the Scoreboard Excel, and overtime and routine working hours are not recorded as entry-exit exact hours, the total hours worked are recorded.

Corrective and preventative actions

It is recommended to keep complete and verifiable time records with Entry and Exit time of workers' regular and overtimes.

Corrective and preventative actions (carried over)

It is recommended to keep complete and verifiable time records with Entry and Exit time of workers' regular and overtimes.

Status

Open*

Time given to resolve

60 days

Verification method

Follow up audit

Area of non-compliance/non-conformance

Local law

← Code area 6

Code area 7 →

Local law reference

WORKING TIMES REGULATION RELATED TO THE LABOR LAW Article 9 Documentation of Working Time—The employer must document the working hours of workers by appropriate means. In accordance with The Turkish Regulation on Overtime and Extra Work art 10 Employer is obligated to arrange a document that indicates the extra working and overtime hours and keep a signed copy of this document in employees' personnel files.

Evidence

NC.Working Hours.Eren Tarım.pdf

* PDF generated at 05:06 (UTC) on 23 Mar 2026. View this finding on the Sedex platform for live updates and closure details.

ZAF601341677

Non-compliance Due 2024-06-04

Code area	Status
6 Working hours are not excessive	Open*

← Code area 6 Code area 7 →

Workplace requirement

6.A Ensure working hours (including overtime) are accurately recorded, and do not exceed legal limits or limits in collective bargaining agreements, whichever gives more protection for workers.

Issue title

469 - Working hours exceed what is allowed by law or collective bargaining agreement - systemic

Description

During document review and management and worker interviews it's observed that; 21 (selected from various departments) out of 26 sample population worked more than 11 hours per day (i.e. 12:00 hr to 13:00 hrs) in February 2026. 22 (selected from various departments) out of 26 sample population worked more than 11 hours per day (i.e. 11:30 hr to 15:30 hrs) in December 2025 . (selected from various departments) 21 out of 26 sample population worked more than 11 hours per day (i.e. 12:00 hr to 13:30 hrs) in October 2025.

Description (carried over)

During document review and management and worker interviews it's observed that; 23 (selected from various departments) out of 26 sample population worked more than 11 hours per day (i.e. 12:00 hr to 13:00 hrs) in October 2024. 17 (selected from various departments) out of 26 sample population worked more than 11 hours per day (i.e. 12:00 hr to 13:00 hrs) in December 2024. (selected from various departments) 17 out of 26 sample population worked more than 11 hours per day (i.e. 12:00 hr to 12:30 hrs) in February 2025.

Corrective and preventative actions

The facility shall ensure that they comply with all legal requirements related to working hours.

Corrective and preventative actions (carried over)

The facility shall ensure that they comply with all legal requirements related to working hours.

Local law reference

Labor Law 4857 Art. 63: With the agreement of the parties, the normal weekly working time may be distributed differently in the workplaces, on the condition that it does not exceed eleven hours a day, to the working days of the week.

Time given to resolve

60 days

Verification method

Follow up audit

Area of non-compliance/non-conformance

Local law

* PDF generated at 05:06 (UTC) on 23 Mar 2026. View this finding on the Sedex platform for live updates and closure details.

ZAF601341678

Non-compliance

Due 2024-05-05

← Code area 6

Code area 7 →

Code area

6 Working hours are not excessive

Workplace requirement

6.B Ensure workers receive all legally required rest and meal breaks, including continuous rest hours between shifts.

Issue title

493 - Rest breaks between shifts are not taken as required - systemic

Description

During document review and management and worker interviews it's observed that; 10 (selected from various departments) out of 26 sample in October 2025 , 6 (selected from various departments) out of 26 sample population in December 2025 and 4 (selected from various departments) in February 2026 worked at least one day without rest for at at least eleven hours during shift changes

Description (carried over)

During document review and management and worker interviews it's observed that; 10 (selected from various departments) out of 26 sample in October 2024, 6 (selected from various departments) out of 26 sample population in December 2024 and 4 (selected from various departments) in February 2025 worked at least one day without rest for at at least eleven hours during shift changes

Corrective and preventative actions

It's recommended that the all workers shall provided their rest breaks during shift changes accordingly to local law.

Corrective and preventative actions (carried over)

It's recommended that the all workers shall provided their rest breaks during shift changes accordingly to local law.

Local law reference

Regulation on Special Procedures and Principles Regarding Work in Works Conducted by Employing Workers in Shifts Article 9 — Workers cannot be employed without resting for at least eleven hours continuously during shift change

Status

Open*

Time given to resolve

30 days

Verification method

Follow up audit

Area of non-compliance/non-conformance

Local law

* PDF generated at 05:06 (UTC) on 23 Mar 2026. View this finding on the Sedex platform for live updates and closure details.

← Code area 6

Code area 7 →

ZAF601341679

Non-compliance

Due 2024-05-05

Code area

6 Working hours are not excessive

Workplace requirement

6.C Provide workers with at least 24 hours of consecutive rest in every 7-day period or, where allowed by national law, two 24 hour periods in every 14-days.

Issue title

487 - Workers do not take off 2 days in 14, regardless of legality in the local context - systemic

Description

During document review and management and worker interviews it's observed that; 13 (selected from various departments) out of 26 sample in February 2026 worked (min 7 to maximum 13 days continuously), 14 workers worked continuously without a week break in December 2025 (from 7 days to 17 days), 13 workers worked continuously without a week break in October 2025 (from 8 days to 22 days)

Description (carried over)

During document review and management and worker interviews it's observed that; 5 (selected from various departments) out of 26 sample in October 2024 worked (min10 to maximum 20 days continuously), 2 workers worked continuously without a week break in December 2024 (from 9 days to 15 days), 2 workers worked 9 days continuously in February 2025 .

Corrective and preventative actions

It's recommended that the weekly rest days provided to workers according to law.

Corrective and preventative actions (carried over)

It's recommended that the weekly rest days provided to workers according to law.

Local law reference

Labor Law Article 46 - In workplaces within the scope of this Law, workers are given at least twenty-four hours of uninterrupted rest (week holiday) within a seven-day period, provided that they have worked on the working days determined in accordance with Article 63 before the holiday.

Status

Open*

Time given to resolve

30 days

Verification method

Follow up audit

Area of non-compliance/non-conformance

Local law

* PDF generated at 05:06 (UTC) on 23 Mar 2026. View this finding on the Sedex platform for live updates and closure details.

← Code area 6

Code area 7 →

ZAF601341680

Non-compliance

Due 2024-06-04

Code area

6 Working hours are not excessive

Workplace requirement

6.D Ensure that working hours do not exceed 60 hours in a standard working week for any worker, except where all of the following are met: this is allowed by national law; - this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce; - appropriate safeguards are taken to protect the workers' health and safety; and - the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies

Issue title

471 - Total working hours exceed 72 hours per week on a regular basis and over an extended period (but are within the parameters of local law or collective bargaining agreement)

Description

During document reviews and interviews and control of 26 of 26 workers time records for February 2026 , December 2025 and October 2025 it's observed that the 12 workers exceed total 72 working hours in a week (min 74,5 max 85 hours) in December 2025)

Description (carried over)

-During document reviews and interviews and control of 26 of 26 workers time records for February 2025, December 2024 and October 2024 it's observed that the 1 workers exceed total 72 working hours in a week (72,5 hours) in October 2024, 3 workers exceed total 72 working hours in a week (Minimum 74,5 hours, maximum 77,5 hours) in December 2024.

Corrective and preventative actions

It's recommended that the total working hours not exceed 72 hours per week.

Corrective and preventative actions (carried over)

It's recommended that the total working hours not exceed 72 hours per week.

Status

Open*

Time given to resolve

60 days

Verification method

Follow up audit

Area of non-compliance/non-conformance

Base code

* PDF generated at 05:06 (UTC) on 23 Mar 2026. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF601341685

Non-compliance

Due 2025-05-19

← Code area 6

Code area 7 →

Code area

6 Working hours are not excessive

Workplace requirement

6.D Ensure that working hours do not exceed 60 hours in a standard working week for any worker, except where all of the following are met: this is allowed by national law; - this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce; - appropriate safeguards are taken to protect the workers' health and safety; and - the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies

Issue title

473 - Total hours exceed 60 hours per week - ETI requirements are not met - systemic

Description

During document reviews and interviews and control of 26 of 26 workers time records for February 2026 , December 2025 and October 2025 it's observed that the 4 workers exceed total 60 working hours in a week (min 61,5-max 68 hours) in October 2025 , 8 workers exceed total 60 working hours in a week (Minimum 62,5 hours, maximum 67 hours) in December 2025; 5 workers exceed total 60 working hours in a week (Minimum 62 hours, maximum 65,5 hours) in February 2026..

Description (carried over)

During document reviews and interviews and control of 26 of 26 workers time records for February 2025, December 2024 and October 2024 it's observed that the 6 workers exceed total 60 working hours in a week (min 62-max72,5 hours) in October 2024, 7 workers exceed total 60 working hours in a week (Minimum 61,5 hours, maximum 77,5 hours) in December 2024.

Corrective and preventative actions

It's recommended that the no workers' exceeding total 60 hours (overtime+regular) in any week.

Corrective and preventative actions (carried over)

It's recommended that the no workers' exceeding total 60 hours (overtime+regular) in any week.

Status

Open*

Time given to resolve

60 days

Verification method

Follow up audit

Area of non-compliance/non-conformance

Base code

* PDF generated at 05:06 (UTC) on 23 Mar 2026. View this finding on the Sedex platform for live updates and closure details.

ZAF601341675

Non-compliance

Due 2025-01-31

← Code area 6

Code area 7 →

Code area

6 Working hours are not excessive

Workplace requirement

6.F Ensure that where overtime is used, it is in order to manage changes in demand or in exceptional circumstances and not used to replace regular employment.

Issue title

480 - Overtime is not used responsibly (i.e. extent, frequency and level of hours worked by individual workers and/or whole workforce are excessive)

Description

During working hours records review, interviews with management and workers it was identified that the workers have worked more than 270 hours overtime per year. 3 (selected from various departments) out of 26 sample population employees worked in excess of 270 hours overtime per year in 2025(i.e. 283,5 hours to 300 hours overtime in 2025).

Description (carried over)

During working hours records review, interviews with management and workers it was identified that the workers have worked more than 270 hours overtime per year. 2 (selected from various departments) out of 26 sample population employees worked in excess of 270 hours overtime per year in 2024 (i.e. 300,5 hours to 341,5 hours overtime in 2024).

Corrective and preventative actions

It's recommended that all workers' yearly overtimes comply with legal limits. The auditor has provided a 365-days time scale.

Corrective and preventative actions (carried over)

It's recommended that all workers' yearly overtimes comply with legal limits. The auditor has provided a 365-days time scale.

Local law reference

Turkish Labor Law No. 4857, Article 41: Total overtime cannot exceed two hundred and seventy hours in a year.

Explanation of difference in resolution time or verification method from the SMETA issue title recommendation

The following NC It will be verified once the 2025 year is completed, because this NC is about yearly total overtime hours between January and December.

Status

Open*

Time given to resolve

Other

Verification method

Follow up audit

Area of non-compliance/non-conformance

Local law

← Code area 6

Code area 7 →

ZAF601341676

Non-compliance

Due 2024-06-04

Code area

6 Working hours are not excessive

Workplace requirement

6.H Ensure that overtime is always compensated at a premium rate, which is not less than 125% of the regular rate of pay.

Issue title

455 - Overtime premium is not paid according to the law - systemic

Description

During document reviews, interviews and management interaction it's observed that; Payment and time records of 26 workers for the months of October 2025 , December 2025 and February 2026 were checked; Accordingly, it was seen that in , Overtime payments were paid with the (Minimum wage/30 days/8 hours*1) account. Overtime payments are not paid as 150% OT premium.

Description (carried over)

During document reviews, interviews and management interaction it's observed that; Payment and time records of 26 workers for the months of October 2024, December 2024 and February 2025 were checked; Accordingly, it was seen that in , Overtime payments were paid with the (Minimum wage/30 days/8 hours*1) account. Overtime payments are not paid as 150% OT premium.

Corrective and preventative actions

It's recommended that the overtimes paid as %150 in line with legal requirements.

Corrective and preventative actions (carried over)

It's recommended that the overtimes paid as %150 in line with legal requirements.

Status

Open*

Time given to resolve

60 days

Verification method

Follow up audit

Area of non-compliance/non-conformance

Local law

← Code area 6

Code area 7 →

Local law reference

Labor Law Number: 4857 Article 41 - Overtime work may be done for reasons such as the general interests of the country, the nature of the work or increasing production. Overtime is work that exceeds forty-five hours per week, within the framework of the conditions written in the Law. In cases where the principle of equalization is applied according to the provision of Article 63, even if the worker's average weekly working time exceeds forty-five hours in total in some weeks, provided that it does not exceed the normal weekly working time, these works are not considered overtime. The wage for each hour of overtime is paid by increasing the normal working wage per hour by fifty percent.

* PDF generated at 05:06 (UTC) on 23 Mar 2026. View this finding on the Sedex platform for live updates and closure details.

← Code area 6

Code area 7 →

6. Working hours are not excessive

Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	110%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	Local law requires 150% premium rates for overtimes based on this issue NC raised during the audit.
Excluding overtime, what are the regular working hours per week for workers at this site?	45.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	59.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	85.0
Maximum number of days worked without a day off in sample	22

← Code area 6

Code area 7 →

7. No discrimination is practiced

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended

← Code area 6

Code area 8 →

Management systems

Explanation for management systems grades	-Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met: Facility has Discrimination Policy 21.05.2019 . Documentation created and refer national regulations however facility shall create a suitable system for the publication, control and revision of documents. -Appoint a manager with sufficient seniority who is responsible for implementing procedures: Bihter Isyaran is in charge of reviewing and implementing standards of human rights,she's also responsible of Quality Assurance and SCR. Multiple job descriptions and lack of some outline of roles and responsibilities. . A clear documented matrix and description is needed to ensure accountability in implementing policies and procedures. -Communicate and train employees and other workers, 05.01.2026 dated training records available ,training topics included recruitment conditions, ETI Base Code, freedom of association, forced labor, wages and benefits, working hours, workplace rules, discrimination, detailed training plan is required and detailed training is required for responsible of implementation policies and procedures. -Monitor the effectiveness of procedures to meet policy and Workplace Requirements:The facility has a basic monitoring system in place, such as attendance records and general observations; however, further improvements are needed to systematically verify procedure implementation and assess training effectiveness through measurable criteria.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 6

Code area 8 →

Systems and evidence examined to validate this code section	-Facility has Discrimination Policy 21.05.2019 -Discrimination policy is strictly prohibited for all kinds of discrimination in the workplace at all stages of employment. - 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. -Facility has a dedicated equity approach in recruitment, training, development and promotion processes. During management interactions, document reviews and interviews it's observed that during job applications at the facility, no evaluation is made based on discrimination indicators such as special circumstances, ethnic origin, family responsibilities. Applications are accepted from all age groups and genders provided that the legal minimum age is met. Health status inquiries such as pregnancy, virginity, HIV/AIDS status are not made during recruitment. Each employee is provided with training opportunities such as Basic Occupational Health and Safety, and job-specific training. Promotion-related evaluations are provided based on performance criteria. - There was no evidence of sexual harassment. - There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases. - The factory provides the same wage amount to male/female employees of the same rank. - There is no restriction for formation of trade union in the factory is observed. Evidence examined to validate this code section -Discrimination Policy 21.05.2019 Dated -Social Compliance Training records dated 05.01.2026. -Worker Interviews, -Health check records. -Management Interactions -26 selected workers' personnel files, contracts, working hours records and wage slips

← Code area 6

Code area 8 →

7. No discrimination is practiced

Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)?	3%
Representation of women in managerial roles (ratio of women workers to women managers)	0%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	4%
Three most common nationalities in managerial and supervisory roles	Turkish

8. Regular employment is provided

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended

← Code area 7

Code area 8.A →

Management systems

Explanation for management systems grades	-Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met: Facility has Facility has Social Responsibility Policy 21.05.2019. refers to the regular employment conditions of work, social security requirements for all workers. Documentation created and refer national regulations however facility shall create a suitable system for the publication, control and revision of documents. -Appoint a manager with sufficient seniority who is responsible for implementing procedures: Bihter Isyaran is in charge of reviewing and implementing standards of human rights,she's also responsible of Quality Assurance and SCR. Multiple job descriptions and lack of some outline of roles and responsibilities. . A clear documented matrix and description is needed to ensure accountability in implementing policies and procedures. -Communicate and train employees and other workers, 05.01.2026 dated training records available ,training topics included recruitment conditions, ETI Base Code, freedom of association, forced labor, wages and benefits, working hours, workplace rules, discrimination, detailed training plan is required and detailed training is required for responsible of implementation policies and procedures. -Monitor the effectiveness of procedures to meet policy and Workplace Requirements:The facility has a basic monitoring system in place, such as attendance records and general observations; however, further improvements are needed to systematically verify procedure implementation and assess training effectiveness through measurable criteria.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

No findings

← Code area 7
Code area 8.A →

Systems and evidence examined to validate this code section	-Facility has Social Responsibility Policy 21.05.2019 - Facility has Working Conditions Policy dated 01.03.2021. - Facility has Human Rights Policy dated 21.05.2019. - Personal files were organized in line with legal requirements. The files contain labor contracts, social insurance forms, job application forms. Facility provide a written contract that specifies the terms and conditions of employment, that meet all legal requirements, in a language workers can understand (Turkish). -There's no ISKUR (Turkish Employment Agency) employees are available. - Recruitment & Hiring and Termination policies exist. - Orientation trainings are ensured before employment starts. .-Personnel Files for 26 sampled employees, Management and Employee Interviews used to validate this code section. -It was determined that no fee was demanded from the workers at the time of recruitment. -It was determined that no HIV-AIDS-pregnancy test was requested during recruitment. -The facility uses an employment or engagement model appropriate to and intended for the nature of work undertaken in the local context. -Facility does not utilize apprenticeships, temporary, irregular, sub-contracted or non employment models of labour for the purpose of avoiding its obligations relating to regular employment, regardless of legality Evidence examined to validate this code section -Social Responsibility Policy 21.05.2019 - Working Conditions Policy dated 01.03.2021. - Human Rights Policy dated 21.05.2019. -Social Compliance Training records dated 05.01.2026. -Worker Interviews, -Health check records. -Management Interactions -26 selected workers' personnel files, contracts, working hours records and wage slips

← Code area 7

Code area 8.A →

8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed	19.44%
Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment	80.56%
Percentage of workers employed as apprentices, trainees or interns	0.0%

← Code area 8
Code area 8.A →

8.A. Sub-contracting and homeworkers are used responsibly

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended

← Code area 8

Code area 9 →

Management systems

Explanation for management systems grades	-Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met: Facility has Social Responsibility Policy 21.05.2019. . Documentation created and refer national regulations however facility shall create a suitable system for the publication, control and revision of documents. Facility shall extend the related policies and procedures about subcontracting. -Appoint a manager with sufficient seniority who is responsible for implementing procedures: Bihter Isyaran is in charge of reviewing and implementing standards of human rights,she's also responsible of Quality Assurance and SCR. A clear documented matrix and description is needed to ensure accountability in implementing policies and procedures. -Communicate and train employees and other workers, 05.01.2026 dated training records available , training topics included recruitment conditions, ETI Base Code, freedom of association, forced labor, wages and benefits, working hours, workplace rules, discrimination, a detailed training plan is required and detailed training is required for responsible of implementation policies and procedures. -Monitor the effectiveness of procedures to meet policy and Workplace Requirements: Facility shall have detailed verification method to monitoring of also facility shall create a proper system to monitor training effectiveness.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

← Code area 8

Code area 9 →

Systems and evidence examined to validate this code section	-Facility has Social Responsibility Policy Dated 21.05.2019, -There's no homeworking and subcontracting. -Production records, Management and worker interviews, Site Tour examined to validate this section. Evidence examined to validate this code section: - Social Responsibility Policy Dated 21.05.2019, -Worker Interviews, -Management Interactions, -Site Tour

← Code area 8

Code area 9 →

8.A. Sub-contracting and homeworkers are used responsibly

Data points

Are homeworkers employed directly or engaged through an agent?	Not applicable
Gender disaggregated data available	

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homeworker?	
Are full records of homeworkers available at the site?	
Does the supplier buy products or services from suppliers that use homeworkers?	No The supplier doesn't buy products or services from suppliers that use homeworkers.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity?	No There's no any concern about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity.

← Code area 8.A

Code area 9 →

Are any sub-contractors used?	No

9. No harsh or inhumane treatment is allowed

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended

← Code area 8.A

Code area 10.A →

Management systems

Explanation for management systems grades	-Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met: Facility has Social Responsibility Policy 21.05.2019, Disciplinary Procedure 21.05.2019, Working Conditions Policy 01.03.2021 and Prevention of Violence, Harassment and Mobbing Policy dated 21.05.2019and facility also has Discipline Regulations to managing potentially unethical behavouirs on the workplace. Documentation created and refer national regulations however facility shall create a suitable system for the publication, control and revision of documents. -Appoint a manager with sufficient seniority who is responsible for implementing procedures: Bihter Isyaran is in charge of reviewing and implementing standards of human rights,she's also responsible of Quality Assurance and SCR. A clear documented matrix and description is needed to ensure accountability in implementing policies and procedures. -Communicate and train employees and other workers, During document reviews, interviews and management interactions it's observed that on 05.01.2026 dated Social Compliance Trainings conducted however it's noted that there's no mechanism to monitor understanding and implementation of training to prevent harsh or inhumane treatment. -Monitor the effectiveness of procedures to meet policy and Workplace Requirements: Facility shall have detailed mechanism to monitor understanding and implementation of training to prevent harsh or inhumane treatment.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
9. No harsh or inhumane treatment is allowed	9.E Ensure appropriate training for workers a...	Base code	NC ZAF601341683

← Code area 8.A

Code area 10.A →

Systems and evidence examined to validate this code section	-Facility has Disciplinary Procedure 21.05.2019 -Facility has Working Conditions Policy 01.03.2021 -Facility has a Prevention of Violence, Harassment and Mobbing Policy dated 21.05.2019 - Facility has Complaint and Reporting System Procedure dated 21.05.2019. -Interviews with workers revealed that there were no incidents of harassment or violence. -There are wish and complaint boxes. In addition to the wish and complaint boxes, workers can also communicate their complaints or suggestions to the facility management through the open door policy. The facility implements measures to prevent and control risks of harsh or inhumane treatment, including gender-based violence and harassment, based on an identification of hazards and risks, including accommodation and worker transport where provided by the employer. Discipline regulation describe that harsh and inhumane treatment in all level strictly prohibited on the workplace - The facility maintains a confidential record of complaints and does not retaliate. -Worker representative committee meets monthly. The last meeting was held on 05.03.2026 .Meeting minutes are shared with workers.-The facility does not impose fines as a disciplinary measure. - The facility does not engage in or facilitate harsh or inhumane treatment of workers, including gender-based violence and harassment. Verified with document review and worker interview. -The facility does not conduct bodily searches. -During document reviews and interviews it's observed that facility conducted 05.01.2026 dated Social Compliance training, however there's no mechanism to monitor understanding and implementation of training to prevent harsh or inhumane treatment. Evidence examined to validate this code section -Disciplinary Procedure 21.05.2019 -Working Conditions Policy 01.03.2021 -Prevention of Violence, Harassment and Mobbing Policy dated 21.05.2019 - Complaint and Reporting System Procedure dated 21.05.2019. -Worker Interviews, -Management Interactions

← Code area 8.A

Code area 10.A →

-26 selected workers' personnel files.

Findings: non-compliances

ZAF601341683

Non-compliance

Due 2025-06-18

Code area

9 No harsh or inhumane treatment is allowed

Workplace requirement

9.E Ensure appropriate training for workers at all levels in roles where risk has been identified and those with relevant supervisory or administrative responsibilities, to prevent harsh or inhumane treatment in the workplace. Have systems in place to monitor the understanding/implementation of the training.

Issue title

943 - There is no mechanism to monitor understanding and implementation of training to prevent harsh or inhumane treatment, or it is inadequate

Description

During document reviews and interviews it's observed that facility conducted 05.01.2026 dated Social Compliance training, however there's no mechanism to monitor understanding and implementation of training to prevent harsh or inhumane treatment.

Description (carried over)

During document reviews and interviews it's observed that facility conducted 09.12.2024 dated Social Compliance training, however there's no mechanism to monitor understanding and implementation of training to prevent harsh or inhumane treatment.

Corrective and preventative actions

It's recommended that obtain the mechanism to monitor understanding and implementation of training to prevent harsh or inhumane treatment.

Corrective and preventative actions (carried over)

It's recommended that obtain the mechanism to monitor understanding and implementation of training to prevent harsh or inhumane treatment.

Status

Open*

Time given to resolve

90 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Base code

* PDF generated at 05:06 (UTC) on 23 Mar 2026. View this finding on the Sedex platform for live updates and closure details.

← Code area 9

Code area 10.A →

9. No harsh or inhumane treatment is allowed

Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?	Yes, there is a formal grievance process The grievance process is available to all workers
What type of grievance mechanism(s) are available?	Suggestion Box
Number of grievances raised in the last 12 months	0
Number of grievances resolved in the last 12 months	0

← Code area 9

Code area 10.A →

10.A. Environment 2-Pillar

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required

← Code area 9

Code area 10.B →

Management systems

Explanation for management systems grades	-Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met: Facility has Environment and Biodiversity Policy 21.05.2019 Facility shall create a suitable system must be established for the publication, control and revision of documents. The facility must document the environmental aspects of its processes in detail. -Appoint a manager with sufficient seniority who is responsible for implementing procedures: Bihter Isyaran is in charge of reviewing and implementing standards of human rights,she's also responsible of Quality Assurance and SCR Multiple job descriptions and lack of some outline of roles and responsibilities. . A clear and documented definition is needed to ensure accountability for effective implementation and oversight of procedures A clear documented matrix and description is needed to ensure accountability in implementing policies and procedures. -Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures: 3.03.2026 dated training records available , detailed training plan is required and detailed training is required for responsible of implementation policies and procedures. -Monitor the effectiveness of procedures to meet policy and Workplace Requirements: It was noted by document review and management interaction that the facility applied for Environmental Permit with application number 703329 , 20.02.2026 dated however did not obtain and maintain Environment permit as per the legal requirement yet. It is recommended that senior management improve themselves in the Monitoring of Environmental Legal Permits. Facility shall have detailed monitoring method about legal permits, wastes, energy consumptions and environmental targets Also, there is no mechanism to monitor wastewater measurement

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
10.A. Environment 2-Pillar	10.A.B Comply with relevant local, regional a...	Local law	NC ZAF601341665

← Code area 9 Code area 10.B →

Systems and evidence examined to validate this code section	-Facility has Environment and Biodiversity Policy 21.05.2019 dated, the facility have a system in place for identifying and remediating gaps between their clients' environmental standards and the environmental impact of their own operations. - Non-hazardous waste records and hazardous waste records are retained. There's no waste burning on site. - Facility maintains a list of hazardous substances used in manufacturing in the chemical inventory. - Facility ensures they are compliant with their clients' requirements and relevant legislation in the destination countries for those substances. - Environmental awareness training was ensured for the workers, 3.03.2026 dated training records seen. - EIA Opinion Letter - B.18.4.İÇO.4.33.00.03/239.12-732-5947 - dated 23.07.2008 -It was noted by document review and management interaction that the facility applied for Environmental Permit with application number 703329 , 20.02.2026 dated however did not obtain and maintain Environment permit as per the legal requirement yet. Evidence examined to validate this code section -Environment and Biodiversity Policy 21.05.2019 dated -Waste declaration records and Environmental targets. -Permit documents. -Environmental training records. -Management Interactions

← Code area 9

Code area 10.B →

Findings: non-compliances

ZAF601341665

Non-compliance

Due 2024-05-05

Code area

10.A Environment 2-Pillar

Workplace requirement

10.A.B Comply with relevant local, regional and national laws or regulations, and have the correct documentation or permits, including for resource use (e.g. water, energy, material) and waste disposal.

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.)

Description

It was noted by document review and management interaction that the facility applied for Environmental Permit with application number 703329 , 20.02.2026 dated however did not obtain and maintain Environment permit as per the legal requirement yet.

Description (carried over)

It was noted by document review and management interaction that the facility applied for Environmental Permit with application number 668314, 27.02.2025 dated however did not obtain and maintain Environment permit as per the legal requirement yet.

Corrective and preventative actions

It is recommended that Environmental permits are ensured by the facility

Corrective and preventative actions (carried over)

It is recommended that Environmental permits are ensured by the facility

Status

Open*

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

← Code area 10.A

Code area 10.B →

Local law reference

Environmental Permit and License Regulation(10.09.2014) Article 5 (1)Facilities subject to environment permit or to environment permit and license are classified on Appendix-1 and Appendix-2 regarding to their impact to environment; (2)The facilities on Appendix-1 and Appendix-2, must provide temporary environmental permit to operate their business. (3)The facilities that take temporary environmental permit, must get the environmental permit or environmental permit and license in 1 year after the date that temporary environmental permit was taken.

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← Code area 10.A

Code area 10.B →

10.A. Environment 2-Pillar

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?	No
Does the site have any valid environmental or energy management certificates?	None.
Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?	No
Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?	No

← Code area 10.A

Code area 10.B →

10.B. Environment 4-Pillar

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
10.B. Environment 4-Pillar	10.B.E Identify and monitor potential negativ...	Local law	NC ZAF601351338

← Code area 10.A
Code area 10.C →

Systems and evidence examined to validate this code section	-Facility has Biodiversity Policy 21.05.2019 dated - Non-hazardous waste records and hazardous waste records are retained. There's no waste burning on site. - Environmental policy exists. - Facility establish resource-use targets and a plan to reach them and the facility monitor and mitigate the site's impacts on biodiversity.. - Environmental awareness training was ensured for the workers, 3.03.2026 dated. -The facility has 27.02.2026 dated Environmental Dimension Assessment Analysis, -Waste Management Plan created 20.08.2024 and valid for 3 years, -Pre-Treatment Plant Project Approval B.18.4.İÇO.4.33.00.02/472-1828 - 04.03.2011 has been seen. -Waste declaration done by the facility on a yearly basis. On Data points section wastes declared as Total Waste Amount and Hazardous Waste Amount separately. Also, the facility declares the Waste Disposal methods to the local authorities and auditors during audit. Waste disposal methods entered the Data Points section. The total waste amount is equal to the total waste disposal method amounts. There's no waste burning onsite. -The carbon footprint calculation for October 7, 2025, was examined according to the ISO 14064-1:2018 standard. -Groundwater usage permit Document No: 21719/1054 - 19.01.2026 has been seen. -During document reviews, management interviews, and the site tour, it was observed that the facility uses groundwater and discharges its wastewater to the on-site wastewater pre-treatment plant, and subsequently to the State Hydraulic Works (DSİ) under the discharge permit dated 07.12.2018 with permit number 89578488-622.99-842553; however, it was observed that there is no flow meter to provide volumetric measurement of the wastewater. Evidence examined to validate this code section - Biodiversity Policy 21.05.2019 dated -Waste declaration records and Environmental targets.

← Code area 10.A

Code area 10.C →

-Permit documents.
-Environmental training records.
-Management Interactions
-Site tour.

Findings: non-compliances

ZAF601351338

Non-compliance

Due 2026-04-22

Code area

10.B Environment 4-Pillar

Workplace requirement

10.B.E Identify and monitor potential negative environment impacts of operations and supply chain and have in place systems that prevent, mitigate or remedy the impacts of their own operations.

Issue title

628 - No/inadequate monitoring of waste water (effluent)

Description

During document reviews, management interviews, and the site tour, it was observed that the facility uses groundwater and discharges its wastewater to the on-site wastewater pre-treatment plant, and subsequently to the State Hydraulic Works (DSİ) under the discharge permit dated 07.12.2018 with permit number 89578488-622.99-842553; however, it was observed that there is no flow meter to provide volumetric measurement of the wastewater.

Corrective and preventative actions

It's recommended that wastewater volumes be monitored.

Local law reference

WATER POLLUTION CONTROL REGULATION Official Gazette Date: 31.12.2004 Official Gazette Number: 25687 Article 54 – (Amended first paragraph: RG-17/12/2022-32046) Wastewater treatment plant operators are responsible for monitoring the efficient operation of treatment plants and keeping records. It is mandatory for wastewater producers to enter data regarding the disposal of wastewater resulting from all types of activities into the wastewater information system and ensure that it is up-to-date. Businesses are obliged to take samples from the effluents of their wastewater at intervals specified in the discharge permit, to control them by measuring and analyzing, to determine, document and declare information regarding the characteristics and quantities of wastewater during inspections. The reports of the results of measurements and analyses conducted by the operators must be kept for at least five years.

Status

Open*

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

* PDF generated at 05:06 (UTC) on 23 Mar 2026. View this finding on the Sedex platform for live updates and closure details.

← Code area 10.B

Code area 10.C →

10.B. Environment 4-Pillar

Data points

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes
What additional specific environmental policies does the site capture?	Zero-waste and recycling protocols Sustainable material sourcing
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes The facility receives environmental consultancy services from Çev-Med Environmental Consultancy as of 27.02.2025. The contract dated 27.02.2025 was reviewed.
Does the site have reduction targets in place to manage climate related risks?	Yes, to increase low-carbon energy consumption or production
Are any of these science-based targets?	No, and we do not intend to set one in the next two years
Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?	No
Has the site checked that any sub-contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	Not Applicable

Usage/discharge analysis

← Code area 10.B   Code area 10.C →

	Last full calendar year (2025)	Previous full calendar year (2024)
Total electricity consumption from non-renewable sources (kWh)	84,670	1,198,320
Total electricity consumption from renewable sources (kWh)	515,421	462,212
Sources of renewable energy used	Onsite generated	Onsite generated
Types of renewable energy used	Solar	Solar
Total natural gas consumption (kWh)	13,862	17,100
Usage of other purchased fuels	Data not available	Data not available
Has the site completed any carbon footprint analysis?	Yes **Scope 1:** 384 (tCO_2e) **Scope 2:** 524 (tCO_2e) **Scope 3:** 1515 (tCO_2e)	No
Water sources	groundwater	groundwater
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	12,366	Data not available
Water discharged	Offsite treatment	Offsite treatment
Water volume discharged (m3)	Data not available	Data not available
Water volume recycled (m3)	Data not available	Data not available

← Code area 10.B

Code area 10.C →

Total waste produced (mt)	122	160
Total hazardous waste produced (mt)	0.1	0.1
Waste to recycling (mt)	121.9	159.9
Waste to landfill (mt)	0	0
Waste to other (mt)	0	0
Total product produced (mt)	14,898	20,761

← Code area 10.B

Code area 10.C →

10.C. Business ethics

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended

← Code area 10.B

Management systems

Explanation for management systems grades	-Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met: Facility has Social Responsibility Policty dated 21.05.2019 ; Business Ethics Procedure dated 21.05.2019 , Conflict of Interest Avoidance Policy dated 21.05.2019 . Anti-Bribery and Anti-Corruption Procedure dated 21.05.2019 .. The facility shall create a suitable system must be established for the publication, control and revision of documents. -Appoint a manager with sufficient seniority who is responsible for implementing procedures: Bihter Isyaran is in charge of reviewing and implementing standards of human rights, she's also responsible of Quality Assurance and SCR A clear documented matrix and description is needed to ensure accountability in implementing policies and procedures. -Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures: 05.01.2026 dated training records available , detailed training plan is required and detailed training is required for responsible of implementation policies and procedures. -Monitor the effectiveness of procedures to meet policy and Workplace Requirements: Facility shall create a proper system to monitor training effectiveness and anti-bribery applications. This system must include regular audits and measurable key performance indicators to verify that all relevant policies are consistently applied across the organization.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 10.B

Systems and evidence examined to validate this code section	-The company has Social Responsibility Policty dated 21.05.2019 . - The company has Business Ethics Procedure dated 21.05.2019 . -The company has a Conflict of Interest Avoidance Policy dated 21.05.2019 . - The company has Anti-Bribery and Anti-Corruption Procedure dated 21.05.2019 . - The facility developed and implemented a transparent and accessible mechanism that effectively allows confidential and anonymous reporting, monitoring and investigation of any fraudulent or unethical business practices without fear of reprisals towards the reporter. Verified with Business Ethics Procedure dated 21.05.2019 and management interview. - The facility obtain and store personal data with the appropriate consents and controls, complying with any legislative requirements. The company has an Explicit Consent Declaration and Personal Data Processing and Approval procedure. An explicit consent declaration for data processing has been obtained from employees. Verified with worker interview and personnel files. - The facility has demonstrated, where appropriate, that licenses and permissions are held relating to ownership and/or leasing of the land where the site operates. -ETI Base Code training 05.01.2026, dated with all relevant staff about Business Ethics Policies. -Facility did not have been subject to any fines proceedings to business ethics. Evidence examined to validate this code section: -Social Responsibility Policty dated 21.05.2019 . -Business Ethics Procedure dated 21.05.2019 . -Conflict of Interest Avoidance Policy dated 21.05.2019 . -ETI Base Code training. -Worker interviews. -Management interviews.

← Code area 10.B

10.C. Business ethics

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with business ethics legislation, regulation, consent or permits (within the last three years)?	No
Provide any certified anti-bribery management systems for the site	None.

← Code area 10.C

Attachments

1- Building Overview.jpeg

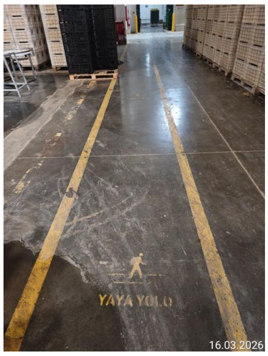
2- General Production Area- Washing, Desenfention.jpeg

3- Packing Section.jpeg

4- Fire Cabinet.jpeg

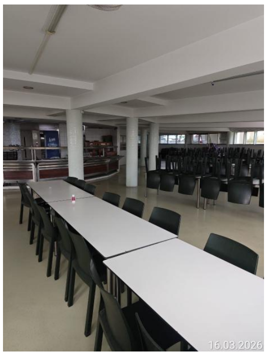
5- Fire Extinguisher.jpeg

6- Alarm Button.jpeg



7- Walking Path.jpeg

8 - Waste Area.jpeg



9 - Dining Hall.jpeg

10 - Drinking Water.jpeg

11 - Suggestion Box.jpeg

12 - Lockers.jpeg

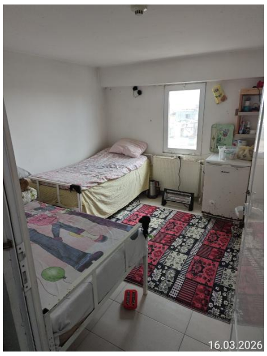
13 - Rest Area.jpeg

14 - First Aid Box.jpeg

15 - Washbasin.jpeg

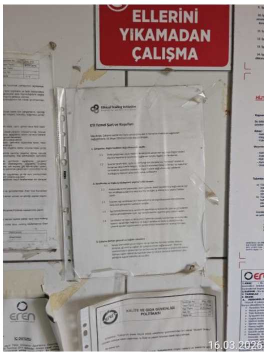
16 - Prayer Room.jpeg

17 - Toilets.jpeg



18 -Dormitory.jpeg

19 - Announcemenet Borad.jpeg



20 - ETI Base Code Display.jpeg

21 - Infirmary Room.jpeg

22 - Assembly Point.jpeg

23 - Emergency Plan.jpeg

24 - Pre-Threatment.jpeg

[25-NC.Working Hours.pdf]   [26-NC.Storage.jpeg]   [27-Signed CAPR.pdf]