

FLA Audit Profile		
Country	Turkey	
Name of Factory	400076649F	400076649FV
Independent External Monitoring	CSCC	Alpay Celikel
Date(s) in Facility	September 25 - 26, 2007	December 24, 2008
FLA Affiliated Compan(ies)	Asics	
Number of Workers	130	
Product(s)	Sportswear	
Production Processes	Cutting, sewing, ironing,	

FLA Comment: This chart was submitted with a corresponding corrective action plan to the FLA and was reviewed by FLA staff. In an effort to improve the effectiveness of remediation, the FLA has provided feedback and recommendations to the company. The FLA has not yet received a response from the company. Therefore, the chart is posted in its current state and will be updated once a finalized chart has been received.

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GEN 1: Establish and articulate clear, written workplace standards. Formally convey those standards to Company factories as well as to licensees, contractors and suppliers.	Noncompliance	Completed	There are no written Company standards at the facility.		It was observed that company has received Asics CoC and posted it on the work floor.	Visual Observation, Management & Worker Interviews		
GEN 2: Ensure that all Company factories as well as contractors and suppliers inform their employees about the workplace standards orally and through the posting of standards in a prominent place (in the local languages spoken by employees and managers) and undertake other efforts to educate employees about the standards on a regular basis.	Noncompliance	Ongoing	The employees interviewed were not aware of the workplace standards.		Although Asics CoC was posted at a prominent place, it was still not communicated to the employees and no training activity has taken place.	Documents Check, Management & Worker Interviews	According to supplier's update, the training on ASICS Code of Conduct has been conducted and provided to all workers on 6 Feb. 2009.	
GEN 3: Develop a secure communications channel, in a manner appropriate to the culture and situation, to enable Company employees and employees of contractors and suppliers to report to the Company on noncompliance with the workplace standards, with security that they shall not be punished or prejudiced for doing so.	Noncompliance	Completed	Workplace standards are not posted on the work floors and there is no secure communication channel established for the employees to contact the Company.		Although Asics CoC was posted at the workplace, it was observed that this CoC doesn't include any local or international hotline for workers to use as a secure communication channel between company and workers for reporting a possible noncompliance.	Documents Check	According to supplier's update, the factory has posted phone numbers on site, also there exists Ministry of Work & Social Security Institution, which from time to time, our workers use for communicating when necessary.	
F.4 Employment Terms/Prohibitions	Risk of noncompliance	Completed	The facility's working regulations indicate that the employees might receive warnings for not accepting to work overtime or to persuade other employees for not working overtime.		Working regulations have been changed and there is no such article anymore. Also there was no written warning observed related to overtime work.	Documents Check, Management & Worker Interviews		
F.9 Employment Records	Risk of noncompliance	Completed	Contracts are not provided to the employees.		It was observed that management has started to give a copy of the contract to workers.	Documents Check, Management & Worker Interviews		
H&A.2 Discipline/Progressive Discipline	Noncompliance	Pending			New Finding: Disciplinary penalties like written warnings are left to the discretion of the management and there isn't any written disciplinary policy. It was also noted that there is not an entity like "Disciplinary Committee" for evaluating the defense of the employees and adjudicate the decision about penalty.	Documents Check, Management and Worker Interviews		
H&A.8 Discipline/Monetary Fines and Penalties	Noncompliance	Pending			New Finding: 2. Section 8/A of the Company Personnel and Disciplinary Regulation stipulates deduction of three daily wages as a disciplinary penalty, which is against Labor Law (maximum deduction aperrmitted by law is two daily wages).	Worker interviews.		

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H&A.11 Discipline/Verbal Abuse	Noncompliance	Pending				New Finding: It was observed that some of the managers and supervisors are screaming, yelling and using insulting language as a means of maintaining worker discipline.	Documents Check		
D.Other	Risk of noncompliance	Completed	There is no written policy or procedure to prevent discriminatory practice.			Asics CoC in workplace covers the policy against discrimination. Besides there wasn't any discrimination related issue observed during the audit.	Documents Check, Management & Worker Interviews		
H&S.1 General Compliance Health and Safety	Noncompliance	Pending				New Finding: Health & Safety trainings are not conducted in accordance with the related regulation.	Documents Check, Management Interviews		
H&S.2 Document Maintenance/Worker Accessibility and Awareness	Noncompliance	Completed	Workers are not aware of the health and safety policies.			It was observed that there is still no periodical training system for raising awareness among the workers about factory's H&S policy.	Documents Check, Management & Worker Interviews	According to supplier's update, factory has adopted quarterly base H&S training to all workers and started from Feb. 2009. The training record will be informed to ASICS.	
H&S.3 Written Health and Safety Policy	Noncompliance	Completed	Written health and safety policy is missing in the facility.			A written H&S policy has been provided.	Documents Check, Management Interviews		
H&S.4 Worker Consultation	Noncompliance	Completed	A supervisor is selected for health and safety committee in the facility while there should also be one elected worker representative and one person appointed by the management in the committee.			Management appointed employee and the worker representative joined the H&S committee, but it was observed that there wasn't any election held for electing the worker representative.	Documents Check, Management Interviews	Factory has conducted an election on 15 Feb. 2009 for the worker representative of the H&S committee.	
H&S.5 Health and Safety Management System	Noncompliance	Ongoing	The committee is holding meetings periodically according to the documentation provided, but not on a monthly basis. Health and Safety Engineer is lacking in the facility.			Monthly H&S Committee meeting reports were observed, but the legally required Health and Safety Engineer (or technician) is still missing in the H&S committee.	Documents Check, Management Interviews	According to supplier's update, factory has appointed Health & Safety Technician in Mar 2009.	
H&S.6 Communication to Workers	Noncompliance	Completed	Health and safety policy is not communicated properly to the workers.			It was observed that there is still not a periodical training system for educating the workers about factory's H&S policy.	Documents Check, Management & Worker Interviews	According to supplier's update, factory has adopted quarterly base H&S training to all workers and started from Feb. 2009. The training record will be informed to ASICS.	
H&S.7 Notification and Record Maintenance	Risk of noncompliance	Completed	There were work accidents while working on sewing machines, however the injury log does not indicate these incidents.			There was a logbook prepared by management but there were no records about minor injuries available in it for whole 2008.	Documents Check, Management & Worker Interviews	According to supplier's update, factory is taking a note in logbook. Factory adopted and made a rule of reporting to authorities for more severe injuries within two days from accident.	
H&S.9 Evacuation Requirements and Procedure	Noncompliance	Completed	Fire training is conducted by the selected workers, but the evacuation drills are not conducted. It was noted that the evacuation route is not marked and the aisle leading from the warehouse to the printing section is blocked.			Evacuation drill was conducted and evacuation routes were marked. There were no blocked evacuation routes observed.	Documents Check, Management & Worker Interviews		
H&S.9 Evacuation Requirements and Procedure	Noncompliance	Pending				New Finding: Emergency exit door on second floor has a dead lock that prevents easy evacuation in case of emergency.	Visual Observation		

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H&S.10 Safety Equipment and First Aid Training	Noncompliance	Completed	It was noted that one fire extinguisher's pressure read zero, one fire extinguisher not marked, one not mounted, and one extinguisher and one fire hose were blocked. It was noted that the emergency lighting in the printing section is missing above the exit. Fire alarm button is missing in the second floor. There are 5 fire hoses located on the work floors, but their maintenance checks are not conducted and the material used for pipes are not plastic.		All fire extinguishers were in good condition, marked and mounted and none of them were blocked. Emergency exit lighting in printing section was installed. Fire alarm buttons were still missing on the second floor and there were still no periodical maintenance records available for fire hoses.	Visual Observation, Management Interviews, Documents Check	According to supplier's update, factory will put additional fire alarm button on second floor.	
H&S.10 Safety Equipment and First Aid Training	Noncompliance	Pending			New Finding: No periodical controls of first aid kits.	Visual Observation, Documents Check		
H&S.10 Safety Equipment and First Aid Training	Noncompliance	Pending			New Finding: Automatic fire extinguishing system on paddle box at the kitchen is missing.	Visual Observation		
H&S.11 Personal Protective Equipment	Noncompliance	Completed	PPE is provided to the employees, but they are not properly selected for the work conducted at the facility. For example, paper masks were seen in the printing section and the correct type masks that filter air are not adequately maintained. Uniforms are not provided to the employees.		PPEs in use weren't selected by the workplace doctor or H&S committee according to risk and exposure levels of the working environment. For instance, there are still organic filters in use as breathing masks in printing and stain removal area that is not suitable for this environment. Uniforms are provided.	Visual Observation, Management Interviews, Documents Check	According to supplier's update, factory will take doctor's approval for the PPEs.	
H&S.12 Use of Personal Protective Equipment	Noncompliance	Completed	2 employees in the embroidery section were not using ear plugs.		Since the embroidery machines were not working during the day of the audit this was not verified.	Visual Observation	According to supplier's update, factory reported that after their inspection made, it was observed that the two person who was accused of not using earplug were not permanent workers of the embroidery section. They were from the design preparation team of the second floor.	
H&S.13 Chemical Management and Training	Noncompliance	Completed	It was noted that some of the containers were missing labels. The chemical warehouse is located near the printing section. It was noted that secondary containment was missing in the chemical warehouse section.		It was noted that all containers were labeled. The chemical warehouse is located near the printing section. Secondary containment was still missing in the chemical warehouse section.	Visual Observation, Management Interviews	According to supplier's update, factory will move chemical warehouse to another section.	
H&S.14 Material Safety Data Sheets/Worker Access and Awareness	Noncompliance	Completed	MSDS are not posted near the chemical storage section, but are maintained in files. The MSDS provided were not for all the chemicals used in the facility.		MSDS are not posted near the chemical storage section, but are maintained in files. The MSDS provided were not for all the chemicals used in the facility.	Visual Observation, Management Interviews, Documents Check	According to supplier's update, factory has posted MSDS in the Chemicals Storage, and also factory provided necessary documents for the missing chemicals in Mar. 2009.	

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H&S.17 Ventilation/Electrical/Facility Installation and Maintenance	Noncompliance	Ongoing	The air emission test is not conducted at the facility to assess the air quality in the sewing section for cotton dust and in the printing section for chemicals. There were open wires in the ironing section which pose direct danger to the employees. The lamps are not covered in the sewing section to prevent fire as cotton dust covers the work floors. There was water leaking through the electrical control panel on the wall of the printing section which poses direct danger of fire. The sewing machine connections are not done properly in order to prevent electricity hazard. There was gas in a box in the compressor room. The steam boiler room does not have an adequate ventilation system. The gas alarm is not checked. The last noise level test was conducted in 2005. The steam boiler's cover is open and there is an electrical switch nearby that is not covered which poses danger.			The air emission test is not conducted at the facility to assess the air quality in the sewing section for cotton dust and in the printing section for chemicals. There were no open wires observed in the ironing section. The lamps in the sewing section were still not covered. Water leaking through the electrical control panel on the wall of the printing section was repaired. The sewing machine connections were corrected. There wasn't gas box or gas tube observed in the compressor room. The steam boiler room does have adequate ventilation. The gas alarm is not checked periodically. The last noise level test was conducted in 2005. There was not any open steam boiler covers observed.	Visual Observation, Management Interviews, Documents Check	According to supplier's update, factory has conducted Air emission test in Feb. 2009. Factory has contacted the authority to conduct a test. Factory is investigating the cost of covering the lamps at sewing section. Noise level test has been conducted together with the air emission test in Feb. 2009. [Pending1]There were no open wires observed in the ironing section. [Pending2]The lamps in the sewing section were still not covered. [Pending3]There wasn't gas box or gas tube observed in the compressor room. [Pending4]The steam boiler room does have adequate ventilation. [Pending5]The gas alarm is not checked periodically.	
H&S.17 Ventilation/Electrical/Facility Installation and Maintenance	Noncompliance	Pending				New Finding: The groundings of the covers of the some electrical panels are missing, isolation of internal parts of electrical panels is not complete and covers of some electrical panels were not closed.	Visual Observation		
H&S.18 Machinery Maintenance and Worker Training	Noncompliance	Completed	It was noted that 25 lower and 4 upper pulley guards were missing on the sewing machines.			Despite most of the pulley guards were installed it was observed that there are still six machines w/o lower pulley guards	Visual Observation	According to factory, this finding is rather subjective point differentiating between inspectors. All of these six machines are two needle Brother sewing machines. They have pulley guards , but their guards are manufactured as semi protected original pulley guards from the manufacturer of the machines, in initial inspection these were found suitable by the inspector, where as second group of inspectors interpret these six machine as w/o lower pulley guards.	
H&S.18 Machinery Maintenance and Worker Training	Noncompliance	Pending				New Finding: Eye protector part of grinding and drilling machines is missing.	Visual Observation		
H&S.20 Bodily Strain	Noncompliance	Completed	Training on how to carry heavy substances for the employees in the warehouse section has not been given by the doctor.			No training was given to workers about this topic yet.	Management Interviews, Documents Check	According to supplier's update, warehouse workers are not carrying heavy loads. They use transpallettes if necessary. Factory has instructed their doctor to give necessary information to warehouse workers.	

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H&S.21 Medical Facilities	Noncompliance	Completed	The certificate of the doctor was missing, but it was faxed by the facility to the lead auditor on October 1, 2007. It was noted that following tests were not conducted by the facility doctor: > eye tests for the employees using monitors > ear tests for the employees in noisy environments > periodic lung checks of the employees in the sewing section > periodic checks of the employees working with chemicals. Proper needle disposal is lacking in the clinic. Latex gloves are missing in one first aid kit and eye wash is missing at another first aid kit.			The certificate of the doctor was provided. It was noted that following tests were not conducted by the facility doctor: > eye tests for the employees using monitors > ear tests for the employees in noisy environments > periodic lung checks of the employees in the sewing section > periodic checks of the employees working with chemicals. Proper needle disposal is lacking in the clinic. Latex gloves and eye wash kits were provided.	Management Interviews, Documents Check	According to supplier's update, factory's doctor has made the requested tests for the related section workers. [Pending1]Proper needle disposal is lacking in the clinic.	
H&S.21 Medical Facilities	Noncompliance	Pending				New Finding: Periodical health check reports of the employees for 2008 are missing.	Documents Check, Management Interviews		
H&S.22 Sanitation in Factory Facilities	Noncompliance	Completed	Facility is not clean.			Facility is clean.	Visual Observation, Management & Worker Interviews		
H&S.23 Toilets	Noncompliance	Completed	It was noted that toilet paper and towels were missing in the toilets and the changing rooms were not clean.			Toilet papers and towels were available in the toilets and changing rooms were clean.	Visual Observation, Management & Worker Interviews		
H&S.24 Toilets/Restrictions	Noncompliance	Pending				New Finding: Section 5/A of the Company Personnel and Disciplinary Regulation restricts restroom usage of workers during working hours.	Documents Check, Management and Worker Interviews		
H&S.26 Drinking Water	Noncompliance	Pending				New Finding: Drinking water sample is not taken from the factory and there is no system for providing periodical sanitization of drinking water fountains.	Documents Check, Management Interviews		
Other	Noncompliance	Pending				New Finding: Missing gas detector in the kitchen area.	Visual Observation		
FOA.26 Grievance Procedure	Noncompliance	Completed	There is no written grievance procedure.			Grievance procedure needs to be detailed and include all related information on the evaluation of complaints and announcement of the results.	Visual Observation, Management & Worker Interviews	According to supplier's update, factory has revised the Grievance procedure. Administrative Manager will be directly responsible for taking the Grievance .The Grievance Box will be opened every 15 days and records will be kept. Each Grievance letter will be replied within 15 days after receipt.	

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HOW.1 General Compliance Hours of Work	Noncompliance	Pending	[#] out of [#] employees interviewed reported working more than 11 hours per day. The time records provided verified the employees' testimonies: [#] employees twice in June 2007, once in July 2007; [#] employee in June 2007 and [#] employee in July 2007 worked more than 11 hours per day.		Although during the interviews it was understood that there is a significant reduction on OT usage due to decreasing orders, because of the unavailability of time records due to a computer error this couldn't be verified.	Management Interviews	According to supplier's update, factory has released new computer operating systems and time record system could not be repaired. Due to economic crisis, factory had postponed the purchase of the new time record system. Factory have investigated the time system in the market. Factory will inform Asics, upon purchase of it and start operating it. Factory has mentioned they do not force workers to work more than their normal standard 9 hours.		
HOW.2 Rest Day	Noncompliance	Pending	[#] out of [#] employees interviewed reported working 7 days per week in November 2006.		Although during the interviews it was understood that there is a significant reduction on OT usage due to decreasing orders, because of the unavailability of time records due to a computer error this couldn't be verified.	Management Interviews	According to supplier's update, factory has released new computer operating systems and time record system could not be repaired. Due to economic crisis, factory had postponed the purchase of the new time record system. Factory have investigated the time system in the market. Factory will inform Asics, upon purchase of it and start operating it.		
HOW.6 Time Recording System	Risk of noncompliance	Pending	Time records for March, April and May 2007 were not provided due to a computer problem.		Time records were <i>again</i> not provided by company due to a computer error.	Management Interviews	According to supplier's update, factory has released new computer operating systems and time record system could not be repaired. Due to economic crisis, factory had postponed the purchase of the new time record system. Factory have investigated the time system in the market. Factory will inform Asics, upon purchase of it and start operating it.		
HOW.6 Time Recording System	Noncompliance	Pending			New Finding: Company once again did not provide the time records of the employees because of a computer problem.	The management stated that they can not provide records for 2008 due to a computer system error.			
WBOT.7 Payment for All Hours Worked	Noncompliance	Pending	Overtime is compensated as time off instead of payment without getting the approval of the workers.		Although time records were not provided by company due to a computer error, during the interviews it was observed that this compensation practice is still ongoing.	Management and Worker Interviews	According to supplier's update, factory has complied with the law and it will never happen again. For instance, factory had overtime in June & July 2008 and the evidence of these overtime has been shown in payrolls, whose payment receipts has been signed by workers.		

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WBOT.8 Calculation Basis for Overtime Payments	Noncompliance	Pending	Overtime is compensated without additional premium as one hour overtime is compensated as one hour time off.			Although time records were not provided by company due to a computer error, during the interviews it was observed that this compensation practice is still ongoing.	Management and Worker Interviews	According to supplier's update, factory started complying with the new regulation as of Jan. 2008. All wages and overtime payments will be done from the bank directly to workers' bank accounts. So the system will be more transparent. Factory is getting written permissions of the workers beginning of every year regarding over time work.	
WBOT.10 Premium/Overtime Compensation	Noncompliance	Pending	Overtime is compensated without additional premium as one hour overtime is compensated as one hour time off.			Although time records were not provided by company due to a computer error, during the interviews it was observed that this compensation practice is still ongoing.	Management Interviews	According to supplier's update, factory started complying with the new regulation as of Jan. 2008. All wages and overtime payments will be done from the bank directly to workers' bank accounts. So the system will be more transparent. Factory is getting written permissions of the workers beginning of every year regarding over time work.	
WBOT.11 Overtime Compensation Awareness	Noncompliance	Pending				New Finding: Workers are not aware of calculation of OT premiums and they need to be trained on that.	Documents Check, Management & Worker Interviews		
WBOT.17 Accurate Calculation and Recording of Wage Compensation	Noncompliance	Pending	Even though overtime compensation is listed on social security payroll, they are compensated as time off and not paid to the employees and even though the employees receive premiums for attendance and production performance, they are not listed on the payroll documentation.			Although time records were not provided by company due to a computer error, during the interviews it was observed that this compensation practice is still ongoing.	Management Interviews	According to supplier's update, factory complies the new regulation started from Jan. 2008. All wages and overtime payments will be done from the bank directly to workers bank accounts. So the system will be more visible. Factory are getting written permissions of the workers beginning of every year ,regarding over time working..	
WBOT.22 Worker Wage Awareness	Noncompliance	Pending				New Finding: Workers are not aware of their wages and they need to be trained on the components of their wages such as social security deductions, minimum living tax refund, cumulative income tax, bonuses, allowances, etc.	Documents Check, Management & Worker Interviews		
WBOT.27 Wage Receipt	Uncorroborated noncompliance	Completed	Payslips not signed by the employees themselves.			It was observed that payslips were signed by employees.	Documents Check,		