FLA Audit Profile		FLA IEV Profile
Country	Turkey	Turkey
Factory name	400376412E	400376412EV
IEM	SGS	Evre Kaynak
Date(s) in facility	October 11, 2006	April 15, 2010
PC(s)	Asics, adidas Group, Patagonia	Asics
Number of workers	140	220
Product(s)	Seamless, Intimate Apparel; Active, Swim, Maternity, and Yoga Wear	
Production processes	Cutting, Embroidery, Sewing, Yarn Cleaning, Final Control, Packing	

adidas Group Comment: In 2006, adidas Group helped create and deliver a remediation plan to this factory in order to address the issues found during the original IEM visit. Shortly after the factory audit, this facility was deactivated by adidas Group's sourcing unit due to production related issues. As a result, the adidas Group's SEA Team was unable to ensure a successful completion of the remediation plan.

			IEM Findings							Remediation					[Status]	Updates		[Status]	Third-Party Verification		Remediation				Company Verification Follow Up	
FLA Code/Compliance Issue	Country Law/Legal Reference	FLA Benchmark	Noncompliance	Risk of Noncompliance	Evidence of Noncompliance (Uncorroborated)	If Not Corroborated, Explain Why	Sources/Documentation	Notable Features	PC Internal Audit Findings (Optional)	PC Remediation Plan	Target Completion Date	Factory Response (Optional)	Company Follow Up (Cite Date)	Documentation	Completed, Pending, Ongoing	Company Follow Up	Documentation	Completed, Pending, Ongoing	External Verification (April 15, 2010)	Documentation	PC Remediation Plan	Target Completion Date	Factory Response (Optional)	Company Follow Up (Cite Date)	Company Follow Up (Cite Date)	Documentation
1. Code Awareness																										
Code Posting/Information		**FLA Principle of Monitoring, Obligation of Companies:** Establish and articulate clear, written workplace standards. Formally convey those standards to Company factories as well as to licensees, contractors and suppliers.	Asics manual was there, but the code was not translated into Turkish and not posted.							Asics and Patagonia will provide code of conduct (COC) posters in Turkish and will advise factory on locations to post.	25-May-07	The companies have been asked to send the posters.	Posters sent from Asics and Patagonia.		Ongoing	1) Factory management must post copy of the contacts in areas that are visible to workers. 2) Factory management must also provide verbal training to all supervisors, managers, and workers on contents of the code. 3) Please ensure to maintain documentation of all trainings provided.		Ongoing	**Completed:** Code is translated in Turkish and posted on the walls of the cafeteria. (See below for findings 2, and 3)							
Worker/Management Awareness of Code		**FLA Principle of Monitoring, Obligation of Companies:** 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.	Workers were not aware of the COC and the COC was not posted at dyeing section of [Subcontractor company name].							PCs will work with either a local staff member or third party to provide code explanation to management. Management will be asked to communicate to workers. ASICS will also ask factory to deliver to [Dyeing subcontractor name].	25-May-07	None of the brands told us that the [Dyeing subcontractor name] needs to have the same standards.			Ongoing	Asics and adidas-Group visited [Factory name] for COC explanation and CAP follow up. 1) Factory management must be aware that adidas' workplace standards apply to adidas' entire supply chain, as a result, all subcontractors must be provided copy of all COCs, and with verbal training of such. 2) In addition, all workers in subcontractors' facilities must be verbally communicated to on contents of the COC.		Ongoing	**Pending:** Workers are not aware of the code and have not received any training on the code. Management reported the code is posted in the dye house as well. However, this could not be verified, as the dye house moved 110km away from the factory, and the audit team has not had time to visit it.		Company provided COC training during visit in March 2010. Training given to Company Account Manager, Human Resources, and Engineer. Supplier will provide trainings to workers. Dates TBD. Company will schedule evaluation of dye house.					
Confidential Noncompliance Reporting Channel		**FLA Principle of Monitoring, Obligation of Companies:** 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.	There is no auditing system concerning subcontractors at the moment.				Though not posted, there is a disciplinary committee with a worker representative and workers know their rights. There are cases where workers have placed complaints to Ministry of Labor.	There are suggestion boxes and worker representatives through which workers can communicate and inform management about their complaints.		1) Factory to make a list of all subcontractors and to ensure that all subcontractors are in compliance with local law by conducting periodic audits. 2) Results of all audits and remediation plan must be maintained in factory floor. PCs will determine a secure channel of communication so that a local company representative can receive complaints or suggestions from workers.	25-May-07	PCs have been asked for the assigning of the communication channel.			6/18/2007 and Ongoing	1) a) Factory management must provide list of all subcontractors producing for any of the brands (Asics, Patagonia); b) Once subcontractors are disclosed, factory management must create a plan to monitor subcontractors to ensure that they are in compliance with local laws/PC's labor, HSE, and environmental standards. c) Copy of internal audits/ action plans for subcontractors to be maintained by factory management. PCs met w/ a [Local group name] to assess if the group would be appropriate for a secure form of communication and trainings. It was determined afterwards that search will continue.		Ongoing	**Ongoing:** Workers are not provided with any direct channels that they can raise a complaint to Asics confidentially. See below (Miscellaneous) for subcontractors.		Company will contact local service provider and devise a plan that is feasible and culturally appropriate. Date TBD.					
2. Forced Labor																										
There will not be any use of forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise.																										
3. Child Labor																										
No person will be employed at an age younger than 15 (or 14 where the law of the country of manufacture allows) or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15.																										
Other				Ages of workers verified mainly from birth certificates. When recruiting a worker, some other official papers are necessary; ages can be cross checked from these papers also.			It was said that there was a company policy: No one hired less than 18 years old.			Factory to have a written minimum-age hiring policy. Policy will be communicated to all employees.	26-Feb-07	Policies already exist; training on the policies will be given.			Ongoing	A detailed training was given to all workers and middle management on the hiring policy. Company Handbook was handed to PC's and given to all employees. Fire training, orientation training, and PPE usage training are given to all employees on their first day. Chemical training was given by the company who provides the chemicals.	Documentation of trainings and attendance lists shown to PC's.	Completed	**Completed:** Factory has a robust age verification system. There is only 1 young worker (17 years old) working at the factory. Her working conditions (hours, regular health check, etc.) are in accordance with the local laws.							
4. Harassment or Abuse																										
Every employee will be treated with respect and dignity. No employee will be subject to any physical, sexual, psychological or verbal harassment of abuse.																										
Other				Procedure is in accordance with Turkish law, but no written policy and declaration of it.						Factory to generate a written Harassment and Abuse Policy and to communicate to all employees, including supervisors, managers, and workers.	26-Feb-07	Policies already exist; training on the policies will be given.			Ongoing	A written non-harassment policy was prepared with detailed procedures and an assigned person. Documented training was given to all employees, including supervisors, managers, and workers about this policy.	Non-harassment policy and training documents were available.	Completed	**Completed:** Factory has a written policy on non-harassment.							
5. Nondiscrimination																										
No person will be subject to any discrimination in employment, including hiring, salary, benefits, advancement, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, or social or ethnic origin.																										
Other				There is no policy or procedure concerning non-discrimination.						Factory to generate a written policy on non-discrimination and communicate to all employees.	26-Feb-07	Policies already exist; training on the policies will be given.			Ongoing	A written non-discrimination policy was prepared with detailed procedures and an assigned person. Documented training was given to all employees, including supervisors, managers, and workers about this policy.	Non-discrimination policy and training documents were available.	Completed	**Completed:** Factory has a written policy on non-discrimination.							
6. Health and Safety																										
Employers will provide a safe and healthy working environment to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of employer facilities.																										
Safety Equipment		All safety and medical equipment (such as fire fighting equipment, first aid kits, etc.) shall be in place, maintained as prescribed and accessible to the employees.	At carbon box storage area, there was a temporary steel profile cutting operation. Sparks were reaching to unprepared boxes; there was no fire extinguisher nearby.				Picture of the area.			Workstations should be assessed for risk and safety and a fire extinguisher mounted near steel cutting operation or, factory will re-assess the proximity of operations and make necessary changes to reduce risk of fire.	Q2 2007	At the time of the audit, factory was carrying out some internal removing/modifications within the building. The steel cutting operation was an extraordinary case. In the future, much more attention will be paid during such activities.			Ongoing				**Completed:** The audit team did not observe any situation/ operation that would cause risk to workers' life or limb.							
Personal Protective Equipment (PPE)		Workers shall wear appropriate protective equipment (such as gloves, eye protection, hearing protection, respiratory protection, etc.) to prevent unsafe exposure (such as inhalation or contact with solvent vapors, noise, dust, etc.) to hazardous elements including medical waste.	No PPE used by workers performing temporary steel cutting at box storage area.				Picture of the area.			Workstations should be assessed for risk and safety and PPE provided to all eligible workers.	Q2 2007	At the time of the audit, factory was carrying out some internal removing/modifications within the building. The steel cutting operation was an extraordinary case. In the future, much more attention will be paid during such activities.			Ongoing	1) Factory management must ensure to complete risk and safety assessment to verify which operations require PPE. 2) Once it is determined which workers need PPE, factory management must ensure to provide required PPE to these workers. 3) Factory management must create, communicate and enforce a PPE policy for workers who are required to work PPE, and conduct periodic checks to verify their proper use.		Ongoing	**Completed:** The workers were provided with necessary PPE in areas where necessary.							
Chemical Management and Training		All chemicals and hazardous substances shall be properly labeled and stored in accordance with applicable laws. Labels shall be placed in the local language and the language(s) spoken by workers, if different from the local language. Workers shall receive training, appropriate to their job responsibilities, concerning the hazards, risks and the safe use of chemicals and other hazardous substances. (S)																	**New Finding:** There are problems with chemical safety and management. Management was not aware that there was a hazardous chemical being used in the sample washing department. No chemical safety training has been given to the workers.		Supplier will identify hazardous chemical in the sample washing department and ensure there is a MSDS available in the local language. Workers will be trained in the proper handling, including PPE, storage, and emergency procedures.					
Material Safety Data Sheets (MSDS)/Worker Access and Awareness		Material Safety Data Sheets (MSDS) for all chemicals used in the factory must be available at the usage and storage sites of the chemicals, in the local language and the language(s) spoken by workers, if different from the local language. Workers shall have free access to MSDS. (R)																	**New Finding:** MSDS for the sample washing department was not available.		Supplier will obtain appropriate MSDS and train users in proper storage and use. Date TBD.					
Health and Safety Management System		The health and safety policy shall contain the framework for a comprehensive health and safety management system within which employers' responsibilities and workers' rights and duties, various responsibilities of designated personnel, procedures that enable workers to raise health and safety concerns and procedures for reporting death, injury, illness and other health and safety issues (for instance, near-miss accidents) are																	**New Finding:** Factory does not have a health and safety policy in place with the involvement of an effective H&S Committee; appropriate health unit; systems to prevent fire safety risks like blocked extinguishers and aisles; cramped work areas, etc.		Supplier will develop a written H&S policy, following the guidelines in finding: including a H&S Committee; appropriate health unit; fire safety; and evacuation procedures. Policy will be communicated to workforce.					
Ventilation/Electrical/Facility Maintenance		All ventilation, plumbing, electrical, and lighting services shall be provided and maintained to conform to applicable laws and prevent hazardous conditions to employees in the facility.																	**New Finding:** Ventilation for the forming department was insufficient. During the day of the audit, 1 of the products with special finishing caused a strong chemical smell in the work area.		Supplier will conduct an air quality survey to evaluate the levels of exposure workers have in forming department and other areas where chemicals are utilized. Results will determine if additional training and PPE is required in these areas.					
7. Freedom of Association and Collective Bargaining																										
Employers will recognize and respect the right of employees to freedom of association and collective bargaining.																										
General Compliance Freedom of Association		Employers shall comply with all local laws, regulations and procedures concerning freedom of association and collective bargaining.																	**New Finding:** The procedures for the worker's representation and workers' committee is not strong. There is no policy on regular elections. Female workers are not involved in the existing procedures actively. Although the records at the factory show that there are two female workers in the workers' committee, the management mentioned only the three male worker representatives during the opening meeting. It verified that female worker representatives are not being recognized, nor are encouraged for active participation in procedures.		Supplier and brand will collectively hire a local service provider to provide trainings to management and the workers' committee in two separate groups. Training will focus on establishing policies and procedures for elections, and for supporting cross-gender participation. The females and males will be interviewed as separate groups to understand their perceptions of the current system and how it can be improved.					
Grievance Procedure		Employer shall have in place written grievance procedures that allow first an attempt to settle grievances directly between the worker and the immediate supervisor but that, where this is inappropriate or has failed, it is possible for the worker to have the grievance considered at one or more steps, depending on the nature of the grievance and the structure and size of the enterprise. Employers shall ensure that the grievance procedures and applicable rules are known to workers. (P)																	**New Finding:** The grievance procedures are not effective. Level of awareness amongst workers on grievance procedures is low.		Factory will be given the options of enhancing existing grievance procedure so that workers are aware and effectively using it, or, an external resource will provide GP trainings for management. DATE TBD.					
8. Wages and Benefits																										
Employers recognize that wages are essential to meeting employees' basic needs. Employers will pay employees, as a base, at least the minimum wage required by local law or the prevailing industry wage, whichever is higher, and will provide legally mandated benefits.																										
9. Hours of Work																										
Except in extraordinary business circumstances, employees will (i) not be required to work more than the lesser of (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture or, where the laws of such country will not limit the hours of work, the regular work week in such country plus 12 hours overtime; and (ii) be entitled to at least one day off in every seven day period.																										
Overtime Limitations		Except in extraordinary business circumstances, employees will (i) not be required to work more than the lesser of (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture or, where the laws of such country will not limit the hours of work, the regular work week in such country plus 12 hours overtime; and (ii) be entitled to at least 1 day off in every 7-day period. An extraordinary business circumstance is a temporary period of extra work that could not have been anticipated or alleviated by other reasonable efforts.	There is always overtime in the knitting department, because they are working in 2 shifts of 12 hour periods each. OT is over legal limits; worker(s)'s OT is already 273.5 hours, which must not be more than 270 hours according to Turkish Labor Law.							Factory should reduce OT in knitting department to come into compliance with Turkish law 4857, or consider hiring additional staff if the overtime is continuous.	Q3 2007	New employees are already hired and shift system has been changed. As of February 1, 2007, the noncompliance has been remediated.			Completed	The shift working departments have been working 3 shifts a day since February 2007.		Completed	**Ongoing:** OT hours at embroidery and forming departments are over the legal limits. Although the legal limit is 270 hours per year, many workers in these 2 departments exceed 280 hours in 5 or 6 months.		Supplier must bring OT hours to the legal limit. Supplier will provide a realistic plan to company that demonstrates improvement.					
10. Overtime Compensation																										
In addition to their compensation for regular hours of work, employees will be compensated for overtime hours at such premium rate as is legally required in the country of manufacture or, in those countries where such laws will not exist, at a rate at least equal to their regular hourly compensation rate.																										
Miscellaneous																										