

FLA Audit Profile															
Country	TURKEY														
Factory name	8007654D														
IEM	SGS/TURKEY														
Date(s) in facility	October 13-14, 2005														
PC(s)	Nordstrom, Inc.														
Number of workers	666														
Product(s)	Ready made knitted apparel														
Production processes	Weaving, knitting, dyeing, cutting, sewing, finishing, delivery, warehousing														
IEM Findings															
FLA Code/Compliance issue	Country Law/Legal Reference	FLA Benchmark	Noncompliance	Risk of Noncompliance	Evidence of Noncompliance (un corroborated)	If not corroborated, explain why	Sources, Documentation used for corroborating	Notable Features implemented by Factory Management or Company	PC Remediation plan	Target Completion Date	Remediation Factory Response (Optional)	Company follow up (Cite date of follow up)	Documentation	(Status) Completed; Pending; Ongoing	Updates (Cite Date of Follow up)
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.	Code posting or information was not done in all production facilities - except ready made division- and in the workplaces of subcontractors.				Throughout site tour of the workplace and during interviews with workers, employer and subcontractors.		Nordstrom will send additional Code of Conduct Posters for the other facilities to be posted for worker review. This poster will state Nordstrom's requirements and be written in the workers' native language.	3/31/2006	Factory requests additional posters to post in all facilities.	3/24/06 Photos sent of code posters posted.	Photos.	Complete.	
Workermanagement 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.	Awareness of workers and white collar staff on Code elements was weak. Training or informational notes were not accessible for all employees including newly employed ones.				Throughout site tour of the workplace and during interviews with workers and employer.		Factory to ensure employees and supervisors are educated about code of conduct standards on a regular basis, including new employee orientation.	3/1/2006	Code training to be conducted 4/30/06.	Re-audit to be conducted in August/September 2006 to verify issues.		Pending.	After submitting the remediation plan for the outstanding FLA audit, Nordstrom has regretfully ceased efforts due to the termination of business relationships between the factory and Nordstrom. Due to the termination of business relationships, the company's leverage for implementing remediation has diminished completely.
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.															
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 or abuse.															
Access to Facilities		Access to food, water, toilets, medical care, health clinics or other basic necessities will not be used as either reward or punishment.					During interviews and control of the records.	Child care /crèche agreement with an authorized company was provided for both female and male workers. (Law requirement is only for female workers.)							
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.															

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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.																
Fire Safety Health and Safety legal compliance	Health and Safety Regulation	Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits.	Cotton concentration in the air was not measured and necessary precautions were not adapted against respiratory problems due to inhalation in the weaving process and in the fabric yarn warehouses.					According to H&S records.		Factory advised to test air quality to ensure the appropriate protective equipment is being worn and proper precautions are taking place.	3/1/2006	Measurements to be done end of April 2006.			Pending.	After submitting the remediation plan for the outstanding FLA audit, Nordstrom has regretfully ceased efforts due to the termination of business relationships between the factory and Nordstrom. Due to the termination of business relationships, the company's leverage for implementing remediation has diminished completely.
Fire Safety Health and Safety legal compliance	Health and Safety Regulation	Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits.	Emission measurement was not done yet. It was scheduled for early November 2005 as informed by environmental engineer.					According to H&S records.		Factory advised to comply with all applicable laws and requirements in a timely manner. Factory advised to send documentation to show the emission test is complete.			Measurement completed in November 2005.	Emission Report sent.	Complete.	
Fire Safety Health and Safety legal compliance	Health and Safety Regulation	Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits.	Noise level measurement was not repeated since 2001 according to new layout.					According to H&S records.		Factory advised to perform a noise level test and keep records updated regularly.	3/1/2006	Since 2001 the same machinery is in use therefore the factory advised the previous measurement results are still valid.			Pending.	12/28/06: Third party re-audit verified noise level measurement was conducted.
Fire Safety Health and Safety legal compliance	Health and Safety Regulation	Employer will comply with applicable health and safety laws and regulations. In any case where laws and code of conduct are contradictory, the higher standards will apply. The factory will possess all legally required permits.	First aid training was performed between 28/04/2003 to 02/05/2003 including 11 staff. But some of them quit work. A new training was not provided since then.					According to interviews and training records.		Factory advised to conduct first aid trainings on a regular basis. Factory advised to keep current training documentation.	3/1/2006		First aid training was conducted in March 2006.	Certificate sent.	Complete.	
Evacuation Procedure		All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, unblocked aisles/paths, employee education, evacuation procedures, etc.) shall be complied with and workers shall be trained in proper safety, first aid, and evacuation procedures.	Access to the fire hoses was blocked in the packaging division and in the fabrics warehouse during working hours.					During visual inspection		Factory advised to train the employees on the importance of fire safety and to have someone responsible in the factory to ensure this doesn't happen on a daily basis.	3/1/2006	All fire hoses have been opened and we will give training to our employees again within this week. 11/7/2005	3.24.06 Both QA and admin supervisor responsible to ensure areas are not blocked. Photos sent of unblocked fire hoses.	Photos.	Complete.	
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.	The same mask was used in the stain removal unit by responsible workers.					During visual inspection		Factory advised to give masks to each of the responsible workers and to train them on the importance of wearing masks.	3/1/2006		3.24.06 Photos of PPE posters sent. Requesting additional photos and documentation regarding training.		Pending.	12/28/06: Third party re-audit verified masks are given to all employees.
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.	Although earplugs have been provided by factory management, they were not being used by weaving and knitting operators and boiler technician.					During visual inspection		Factory advised to give trainings on the importance of earplugs to all workers and to include it in the new employee orientation. Factory advised to have postings to remind workers to wear the earplugs.	3/1/2006		3.24.06 Photos sent of workers utilizing appropriate earplugs in noted areas.	Photos.	Complete.	
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.	Earplugs were not provided for one of the lesser raising machine operators in the dyeing process.					During visual inspection		Factory advised to provide personal protective equipment (PPE) for all workers. Factory advised to have someone responsible for training employees on the use of PPE.	3/1/2006		3.24.06 Photos sent of workers utilizing appropriate earplugs in noted areas.	Photos.	Complete.	
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.	Audition limit measurement was not done for noisy processes' operators.					During control of medical records and worker interviews.		Factory advised to conduct tests for audition limits and to document tests and trainings for the noisy processes' operators.	3/1/2006	Since 2001 the same machinery is in use therefore the factory advised the previous measurement results are still valid.			Pending.	12/28/06: Third party re-audit verified noise level measurement was conducted.
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.	Plastic apparatus were not accessible for three of the overlock seam machines in the sample preparation division.					During visual inspection		Factory advised to fix the overlock seam machines with plastic apparatus. Factory advised to create a schedule for maintenance and dedicate a person who is responsible for maintaining the machines.	3/1/2006		3.24.06 Protective equipment has been installed on these three machines.	Photos.	Complete.	
Chemical Management		All chemicals and hazardous substances should be properly labeled and stored in accordance with applicable laws. Workers should receive training, appropriate to their job responsibilities, in the safe use of chemicals and other hazardous substances.	Some of the chemicals which have been used frequently were kept in easily accessible locations around related operations. They were not identified and labeled properly.					During visual inspection		Factory advised to store chemicals in a storage room and to label all chemicals being used. Factory advised that all supervisors and employees need to be trained on the importance of chemical storage.	3/1/2006		3.24.06 Photos of chemical area sent with signage and labels present. Confirmed all chemicals stored in one location.	Photos.	Complete.	
Record Maintenance		All safety and accident reports shall be maintained for at least one year, or longer if required by law.						Control of the records		A comprehensive recording system about workplace incidents/accidents is seen. On the other side, workplace Doctor was analyzing the most common treatments in a month. The corrective or preventive actions against recurrence of the workplace accidents/incidents were supported by Health and safety committee's meeting notes.						

IEM Findings																
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Sanitation in Dining Area		All food preparation shall be prepared, stored, and served in a sanitary manner in accordance with applicable laws. Safe drinking water should be available in each building.	Water fountains in the workplace were not clean enough.				Visual inspection		Factory advised to maintain all areas of the factory, including making sure workers have potable water. Factory advised to have someone responsible for maintaining the factory.	3/1/2006		3.24.06 Factory cleaners report to supervisor who conducts regular checks on water fountains.	Photos.	Complete		
7. Freedom of Association and Collective Bargaining																
Employers will recognize and respect the right of employees to freedom of association and collective bargaining.																
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																
Other							Interviews with workers and management	Free transportation between home and factory was provided from different locations.								

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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	Labor Law article 63: Regular working hours should not exceed 11 hrs/day and 45 hrs/week.	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. An extraordinary business circumstance is a temporary period of extra work that could not have been anticipated or alleviated by other reasonable efforts.	Some of the workers in packaging and dyeing operations were exceeding maximum limit of 11 hrs/day regular working hours in application.				Control of the working hours records (timecards) and interviews with workers and management		Factory advised that employees will not be required to work more than the 48 hours per week and 12 hours overtime. Factory advised that all workers must receive 1 day of rest after 6 consecutive days worked. This is regardless if it is peak season or production is very high. Factory advised to reduce OT hours to be within local law limits with working hours.	12/1/2005 (immediately)		Re-audit to be conducted in August/September 2006 to verify issues		Pending	After submitting the remediation plan for the outstanding FLA audit, Nordstrom has regretfully ceased efforts due to the termination of business relationships between the factory and Nordstrom. Due to the termination of business relationships, the company's leverage for implementing remediation has diminished completely.	
Overtime Limitations	Labor Law article 41: Overtime working hours should not exceed 3 hrs/day and 270 hrs/year.	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. An extraordinary business circumstance is a temporary period of extra work that could not have been anticipated or alleviated by other reasonable efforts.	Some of the workers in packaging and dyeing operations were exceeding maximum limit of 3 hrs/day and in total 270 hrs/year overtime working hours in application.				Control of the working hours records (timecards) and interviews with workers and management		Factory advised that employees will not be required to work more than the 48 hours per week and 12 hours overtime. Factory advised that all workers must receive 1 day of rest after 6 consecutive days worked. This is regardless if it is peak season or production is very high. Factory advised to reduce OT hours to be within local law limits with working hours.	12/1/2005 (immediately)		Re-audit to be conducted in August/September 2006 to verify issues		Pending	After submitting the remediation plan for the outstanding FLA audit, Nordstrom has regretfully ceased efforts due to the termination of business relationships between the factory and Nordstrom. Due to the termination of business relationships, the company's leverage for implementing remediation has diminished completely.	
Overtime Limitations	Labor Law article 46: In a seven day period uninterrupted and minimum 24 hours rest break should be given.	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. An extraordinary business circumstance is a temporary period of extra work that could not have been anticipated or alleviated by other reasonable efforts.	Some workers in packaging process had no one-day off in seven-day period in August 2005 according to time card records.				Control of the working hours records (timecards) and interviews with workers and management		Factory advised that employees will not be required to work more than the 48 hours per week and 12 hours overtime or what is allowed by local law. Factory advised that all workers must receive 1 day of rest after 6 consecutive days worked. This is regardless if it is peak season or production is very high. Factory advised to reduce OT hours to be within legal limit and start providing 1 day of rest to all workers.	12/1/2005 (immediately)		Re-audit to be conducted in August/September 2006 to verify issues		Pending	After submitting the remediation plan for the outstanding FLA audit, Nordstrom has regretfully ceased efforts due to the termination of business relationships between the factory and Nordstrom. Due to the termination of business relationships, the company's leverage for implementing remediation has diminished completely.	
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.																

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Miscellaneous																
Subcontracting			None of the packaging subcontractors had been chosen or approved by customers. And there was no selection or evaluation criteria on subcontractors although a documented subcontractor evaluation checklist was available since 2001. Company has no control on packaging subcontractors in 2005.				According to interviews and some visual or documented evidences.		Factory advised to inform Nordstrom about any subcontractors to be used for the production of Nordstrom products or components. Factory advised to not place any production with subcontractors without written approval and authorization from Nordstrom, and only after the subcontractor has agreed to comply with the Partnership Guidelines. Factory advised to train all employees on policies and procedures internally to ensure all requirements are met.	12/1/2005 (immediately)	Factory stated and agent confirmed that no subcontractors are being used for Nordstrom's production. It is only used during peak periods for the local and Russian markets.	3/24/06 Included in the QA job description are procedures regarding subcontractors. Factory has created policies to ensure production is completed per PC requirements. Re-audit to be conducted in August/ September 2006 to verify issues. Re-audit to be scheduled.		Pending	After submitting the remediation plan for the outstanding FLA audit, Nordstrom has regretfully ceased efforts due to the termination of business relationships between the factory and Nordstrom. Due to the termination of business relationships, the company's leverage for implementing remediation has diminished completely.	
Subcontracting			[Two factories] named subcontractors were used for shoulder-sleeve sewing operations according to 2/1/05/2005 dated order follow up form. It is informed that they were not approved by FLA Brand.				According to order forms and interview with management.		Factory advised to inform Nordstrom about any subcontractors to be used for the production of Nordstrom products or components. Factory advised to not place any production with subcontractors without written approval and authorization from Nordstrom, and only after the subcontractor has agreed to comply with the Partnership Guidelines. Factory advised to train all employees on policies and procedures internally to ensure all requirements are met.	12/1/2005 (immediately)		Re-audit to be scheduled. Factory has created policies to ensure production is completed per PC requirements. Re-audit to be conducted in August/ September 2006 to verify issues.		Pending	After submitting the remediation plan for the outstanding FLA audit, Nordstrom has regretfully ceased efforts due to the termination of business relationships between the factory and Nordstrom. Due to the termination of business relationships, the company's leverage for implementing remediation has diminished completely.	
Illegal Subcontracting			During audit, a 13-year-old child laborer was seen in the dining hall who was working in one of the subcontractors' workplace close to factory.				Throughout site tour in the workplace and during interviews with workers, employer and subcontractors.		While Nordstrom doesn't utilize the subcontractor, factory was advised of [Nordstrom's] Child Labor policy and that children can't visit and/or tour the work floor due to safety issues. Factory was reminded of [Nordstrom's] policy and asked to provide training and communicate policy to all employees to ensure this won't happen again. Factory advised to provide company policy and timeline of training.	12/1/2005 (immediately)		Re-audit to be scheduled. Factory has created regulations and policies to ensure unauthorized persons are not on the factory premises. A re-audit will be scheduled to verify this process. Re-audit to be conducted in August/ September 2006 to verify issues.		Pending	After submitting the remediation plan for the outstanding FLA audit, Nordstrom has regretfully ceased efforts due to the termination of business relationships between the factory and Nordstrom. Due to the termination of business relationships, the company's leverage for implementing remediation has diminished completely.	