

FLA Audit Profile		Independent External Verification																		
Country	Turkey	Country	Turkey																	
Factory name	07037655D	Factory name	07037655DV																	
IEM	SGS/Turkey	IEM	Aydin Oruc																	
Date(s) in facility	September 5-6, 2005	Date(s) in facility	November 24-25, 2011																	
PC(s)	Puma, Nike, Inc., adidas AG	PC(s)	Nike, Inc., adidas AG																	
Number of workers	1192	Number of workers																		
Product(s)	Ready-made Knitted Apparel	Product(s)																		
Production processes	Cutting, Classification, Sewing, Embroidery, Pressing, Finishing, Washing, Warehousing	Production processes																		
				IEM Findings					Remediation			Updates (Cite Date of Follow Up)		Third-Party Verification		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 Used For Corroborating	Notable Features	PC Remediation Plan (November 1, 2005)	Target Completion Date	Company Follow Up (February 14, 2006)	Documentation	Company Follow Up (June 15, 2006)	Documentation	External Verification (November 24-25, 2011)	Documentation	Company Follow Up (March 30, 2012)	Documentation	Status	
1. Code Awareness																				
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.																				
Legal Compliance For Juvenile Workers	Labor Law Clause 71: Regular working hours of young workers should not exceed the 8 hours/day and 40 hours/week limitation.	Employers will comply with applicable laws that apply to young workers, i.e., those between the minimum working age and the age of 18, including regulations relating to hiring, working conditions, types of work, hours of work, proof of age documentation, and overtime.	41 juvenile workers under 18 years of age have been working 45 hours/week, like the other regular workers; this is in excess of the legal limit.				During worker and management interviews and control of working hours records, management was aware of this incorrect application and looking for how to arrange working hours, operation processes, and transportation services. There is a "line system" in the production, and removing someone from the line means cutting production. Therefore, the correct implementation was not observed.		From documentation check and management interviews, the youngest factory employee was born October 27, 1987. Therefore, there are no juvenile workers in the factory as of November 1, 2005. For example, the youngest worker is actually 18 years and 3 days. On September 5-6, during the FLA audit, there were only 4 juvenile workers. In order to avoid future noncompliances in this area, the factory should develop systems to fulfill all legal requirements for juvenile workers. Juvenile workers should: a) work a maximum of 8 hours/day and 40 hours/week, b) have annual health checks twice a year, and c) have at least 20 days of paid annual vacation. Also, the factory should provide a) visual identification for juvenile workers, b) training for juvenile workers on their additional rights, and c) training to HR staff, middle management, and supervisors on juvenile worker rights, ensuring that OT procedures include a review on how no juvenile	31-Dec-05	Factory revised its hiring policy and included all the policies and procedures regarding juvenile workers. A training was given to the Human Resources staff, middle management, and supervisors about the revised hiring policy on November 16, 2005, including juvenile workers.	documented policy, training documentation on file	Remediation was verified during the Nike audit on May 3, 2006.	employee list, walkthrough	Completed: During the verification audit, no young workers were noted at the factory. The youngest worker noted was 18 years and 4 months.					
Other															New Finding: There is only 1 service bus for transportation for the children who use the canteen facility. Although there are 63 children who use the service bus, the seating capacity of the bus is limited to 30.		The daily average number of children that go to the canteen is 40. There is now a second service bus for these children and the total capacity of these 2 service buses is 50 (20+30); they have sufficient capacity for the daily average number of children.	photo of 2 service buses for canteen facility sent to FLA for review	Completed	
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.																				
Sexual Harassment		Employers shall not offer preferential work assignments or other preferential treatment of any kind in actual or implied exchange for a sexual relationship, nor subject employees to prejudicial treatment of any kind in retaliation for refused sexual advances.													New Finding: 8 of the female workers interviewed reported that 3 or 4 service bus drivers verbally abuse workers as they get on and off the bus. The issue was reported through the suggestion boxes and discussed during the worker representation meetings. Although the drivers were warned by management, interviews with the workers revealed that the issue still continues.		Management has given a documented training to all drivers on harassment and abuse on November 28, 2011. The training included the company policies and procedures and the relevant articles of the local law regarding harassment and abuse, and reminded the participants about the enforcements in case of any noncompliance with these policies and procedures. A separate meeting has been held between worker representatives, drivers and management about what proper communication with workers should be. Management has also assigned a room for the service car drivers to wait in while workers are getting on the buses in the evenings. They only go to their cars after all workers are on board. The feedback we received from the workers during worker interviews	drivers training attendee list, related photo sent to FLA for review	Completed	
Verbal Abuse		Employers will prohibit screaming, threatening, or demeaning verbal language.													New Finding: Although the factory has written policies against verbal abuse and supervisors and line chiefs were provided training on the issue, the review of worker complaints brought through the suggestion boxes revealed that some supervisors and line chiefs still perpetrate verbal abuse, and shout at workers using slang language and threats such as "idiot," "stupid," "Play away your salary?," "You will be warned if you don't give the target," and "We will fire you."		A documented training has been given to middle and upper management as a reminder of the company's "non-harassment" policies and procedures on November 28, 2011. Participants were informed about the FLA audit findings and reminded once again about the enforcement actions the company has stated in their company policies and also the relevant labor law articles in case anyone does not comply with these standards. Management also gave a separate training on the same day to the same group on how to communicate properly and how to motivate workers with a proper approach. The feedback we received during worker interviews showed that the training was successful.	training attendee list of white collar employees, related photo sent to FLA for review	Completed	
Access to Facilities		Access to food, water, toilets, medical care or health clinics or other basic necessities will not be used as either reward or punishment.					Childcare in a crèche is provided for both female and male workers. (Legal 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.																				
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	Labor Law, Workplace health and safety regulations, Article 31 requirement. When the population of workers in a company raises over 1000, a second nurse or trained nursery staff is required for the 1, 2, 3 risk levels of industrial sectors.	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.	There were 1192 employees in the factory. The second nurse or nursery staff was not there, as accorded by labor law requirements.				visual inspection, management interview		It was observed that the factory has already started searching for a second nurse through advertisements. A second nurse will be hired by the end of November. In order to avoid future noncompliances, the factory should have a system to track all the new laws and regulations in this area.	31-Dec-05	Factory hired a second nurse as of December 30, 2005.	copy of advertisement and job application form on file, social security registration, time card records for January, and graduation certificate of nurse on file	Remediation was verified during the Nike audit on May 3, 2006.	social security registration of nurses, nurse certificates	Completed: The factory has 1 doctor and 1 nurse. As the requirement for a second nurse has been removed from the law, the issue is completed.					
Evacuation Procedure	As per Turkish Occupational Health & Safety Regulation (77583) Article 113 of Turkish Labor Law 4857, the facility shall have all exit doors open outwards for emergency cases.	All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, unblocked aisles/exits, employee education, evacuation procedures, etc.) shall be complied with and workers shall be trained in proper safety, first aid, and evacuation procedures.													New Finding: The emergency exit door was opening inwards in the canteen.		The mentioned door was just a connection door for the corridor between the kitchen and work area. The door was not necessarily needed and, therefore, management has decided to take away the mentioned door. So, the door is removed and the emergency exit is free of blockage.	photo sent to FLA for review	Completed	

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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.	Although earplugs have been provided by factory management, some embroidery operators and boiler technician were not wearing them.				visual inspection		The factory should once more train workers. Factory management should also train their supervisors and other middle management because it is important for workers to see their superiors also using PPE. Trainings should be continuous and the factory should measure the effectiveness of these trainings and document them.	31-Dec-05	Factory trained workers, supervisors and managers at embroidery and printing on November 16, 2005.	signatures of participants who received training on file	Remediation was verified during the Nike audit on May 3, 2006.	walkthrough	Completed: Per noise measurement report, the workers do not need to use earplugs while working in noisy areas like embroidery section.				
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.	Boots were not accessible in the chemical storage location of the printing process.				visual inspection		Boots are accessible. In order to avoid future noncompliances in this area, the factory should post a warning sign about the usage of boots. Factory should develop and retain documentation that boots are provided and that workers receive training on the use and location of boots.	31-Dec-05	Factory posted the warning sign and gave training to relevant employees in that department on the use of boots/protective footwear.	photos taken as verification; signatures of participants who got the training on file	Remediation was verified during the Nike audit on May 3, 2006.	walkthrough	Ongoing: As the factory layout has changed and chemicals are transferred automatically, not all workers need boots any more. However, 1 worker who carries buckets to production areas is still not provided with any boots. The portable eye washing kit was not fixed where chemicals are kept at the printing section.		Suitable boots and eyewash kit were provided.	photos of 1) boots available for employee who carries buckets, 2) eye washing kit sent to FLA for review	Completed
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.		Limit measurement was not done for embroidery operators.			control of medical records, worker interviews		Audition measurement were done November 9 for 16 embroidery operators and 1 operator who is responsible for the boiler. Measurements took place at a hospital approved by local health authorities. All 17 tests were under normal limits and there were no recommendations. All test results have also been checked by a doctor and approved. In order to avoid future noncompliances in this area, the factory should perform audition tests at least annually, report on file, and provide remediation. Trainings on using PPE should continue. Factory management should also train their supervisors and other middle management, as it is important for workers to see their superiors also using PPE. Trainings should be continuous and the factory should measure the effectiveness of	31-Dec-05	Factory has prepared a procedure that indicates that audition tests will be performed at least annually for embroidery employees and employees in other noisy areas, including remediation procedures. Factory has given trainings to workers, supervisors and management about using PPE on November 16, 2005.	November 1, 2005; copies of audition measurement reports on file with PC; audition test procedure documentation on file, signatures of participants who got the training on file	Remediation was verified during the Nike audit on May 3, 2006.	document check	Completed: It was noted that the factory provided noise measurement reports for both embroidery and printing section.				
Record Maintenance		All safety and accident reports shall be maintained for at least 1 year, or longer if required by law.		The corrective or preventive actions against the recurrence of workplace accidents/incidents were not recorded tidily to prove efficiency of those actions and to ensure traceability of continual improvement.			inspection of medical records; very comprehensive recording system is seen about all factory accidents, medical emergencies, and general safety issues, but no more further steps as mentioned by the noncompliance.		The factory has already got an accident/sickness log. They keep records of every incident, but those records are not linked to corrective and preventive actions effectively. The factory will keep monthly statistics both for accidents and sicknesses. Health & Safety team will evaluate the report and take preventive and corrective actions and record them.	31-Dec-05	Factory developed a detailed registration process for sicknesses and accidents; however, monthly statistics and preventive actions are not done yet. Factory's H&S Committee will start following up this issue as of March.	Detailed records of sicknesses and accidents from January 2006	It was observed during the audit dated May 3, 2006 by Nike that detailed statistics are already prepared by the nurse. As of June 1, most frequent issues started to be discussed at H&S Committee meetings and decisions about preventive measures are being taken.	statistics reports, minutes from H&S Committee meetings	Completed: It was noted that the factory keeps records of all accidents and discusses those during H&S meetings that are held regularly every month in order to take preventive actions.				
Record Maintenance		All safety and accident reports shall be maintained for at least 1 year, or longer if required by law.		Personal health files were not identified systematically, it was not easy to access some of them. Workplace injuries or accidents were not recorded on each of the relevant personnel health files, either.			medical record inspection		The health files are already filed according to the employee numbers. Factory also started recording workplace injuries/accidents in each relevant personnel file. Additionally, factory should develop and document procedures for Employee Health Inspections which will include filing systems as well as other subjects. Management should also provide training to responsible persons about the Employee Health Inspection procedures and verify that the system is functioning regularly.	31-Dec-05	Factory developed a clinic procedure that includes roles and responsibilities of clinic staff. Factory developed and documented procedures for systematizing files and recording accidents/injuries in each worker's health file.	01-Nov 2005. Photos are taken as verification 14-Feb-2006. Clinic procedures on file	Remediation was verified during the Nike audit on May 3, 2006.	document check	Completed: It was noted that the personnel health files are maintained systematically and the records for workplace injuries or accidents are recorded in each file.				
Worker Participation		Workers should be involved in planning for safety, including through Worker Safety Committees.							Scheduled and organized trainings on health and safety were being determined in accordance with needs of workplace and workforce. Efficiency of the taken trainings were also being evaluated with different methods for advanced subjects.										
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.	There was no flywatter or similar precaution against flies or other insects on the kitchen windows.				visual inspection		Factory to install flywatter in the kitchen and the lunch hall.	30-Nov-05	Factory installed flywatters in the kitchen and the lunch hall.	Photos on file	Remediation was verified during the Nike audit on May 3, 2006.	walkthrough	Completed: It was noted that the windows of the kitchen are covered against flies or other insects.				

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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.																				
Legal Benefits		Employers will provide all legally mandated benefits to all eligible workers.		Annual leaves were not well scheduled according to some interviewed workers.		Employers will provide all legally mandated benefits to all eligible workers.	interviews with workers and control of annual leave records. Having completed his first year in the factory, an employee has right to use his annual leave. But, this was not the case for some workers who have been working more than 15 months. No clearly scheduled annual leave record was seen.		All employees who have worked at least 1 year, including the trial period, from date of recruitment are entitled annual paid leave. The employee uses their annual leave within the following service year. Factory should make sure all employees use their legal rights on time. Factory should also develop and document a system for scheduling annual leave. Factory should provide written documentation of annual leave policy and procedures to all workers; train all workers, supervisors and middle management in the annual leave policy and procedures. Factory should also maintain a system for recording annual leave earned and annual leave taken each month (in payroll and/or on pay slip). In order to avoid future noncompliances, factory should develop a regular timeline for verifying that all workers have taken annual leave (i.e., 2 times a year review leave records and remind	31-Dec-05	Factory developed procedures for Paid Annual Leave Committee whose responsibility is to plan annual leaves. Factory also maintained a system for recording annual leave earned. Workers are taking their annual leave within the timeframe established by law.	Procedure for the Paid Annual Leave Committee and Annual Leave Plan on file	Remediation was verified during the Nike audit on May 3, 2006.	document check	Ongoing: Although there is an established Annual Leave Committee at the factory, record review revealed that annual leaves are not provided in compliance with the law. Annual leaves are divided to more than 3 periods of less than 10 days, and some workers' annual leaves are accumulated, as they were not able to take any annual leave. The records kept on annual leaves do not match with the attendance (time) records for hiding the practice from official government audits.		The discrepancy between the annual leave form and annual leave logbook has been eliminated, as the factory has decided to show the actual leave day dates of workers on the official annual leave book as well. The reason for the discrepancy was that the relevant labor law asks factories to give leaves 10 days in a row to their workers as leave, but this does not match with workers' needs. This has been verified through documentation check and worker interviews.	annual leave form, annual leave logbook	Completed	
Accurate Benefit Compensation		All employees will be credited with all time worked for an employer for purposes of calculating length of service to determine the benefits to which workers are entitled.					worker and management interviews	"The best line of the month" is chosen in accordance with the production productivity. The line members are awarded with a gold coin that motivates the workers.												
Other							worker and management interviews	During interviews, workers expressed their pleasure about the library available for leisure hours.												
Other							worker and management interviews	Free transportation between home and factory is provided from 120 different locations.												
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 law of country of manufacture or, where laws of such country will not limit hours of work, 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																		
Legal Compliance with Protected Workers	Labor Law, Clause 71: Regular working hours of young workers should not exceed 8 hours/day and 40 hours/week limitation.	The factory will comply with all applicable laws governing work hours, including those regulating or limiting the nature and volume of work performed by women or workers under the age of 18.				41 young workers under 18 years of age have been working 45 hours/week like the other regular workers; this exceeds the legal limit. (PLEASE ALSO SEE ABOVE THE SAME NONCOMPLIANCE UNDER CHILD LABOR.)	During interviews with workers and management and control of working hours records, 41 young workers under 18 years of age have been working 45 hours/week between 08:30 - 18:30, 9 hours a day like the other regular workers. It means 1 hour more in a day and 5 hours more in a week, which does not coincide with legal requirements.		From documentation check and management interviews, the youngest factory employee was born October 27, 1987. Therefore, there are no juvenile workers in the factory as of November 1, 2005. For example, the youngest worker is actually 18 years and 3 days. On September 5-6, during the FLA audit, there were only 4 juvenile workers. In order to avoid future noncompliances in this area, the factory should develop systems to fulfill all legal requirements for juvenile workers. Juvenile workers should: a) work a maximum of 8 hours/day and 40 hours/week, b) have annual health checks twice a year, and c) have at least 20 days of paid annual vacation. Also, the factory should provide a) visual identification for juvenile workers, b) training for juvenile workers on their additional rights, and c) training to HR staff, middle management, and supervisors on juvenile worker rights, ensuring that OT procedures include a review on how no juvenile workers are to perform any OT work.	31-Dec-05	Factory revised its hiring policy and included all the policies and procedures regarding juvenile workers. A training was given to the Human Resources staff, middle management, and supervisors about the revised hiring policy on November 16, 2005, including juvenile workers.	November 1, 2005: A list of all employees with date of birth information was reviewed and taken as verification. Copy of ID documentation of the youngest workers was also checked. February 14, 2006: Revised hiring policy and signatures of participants in training on file.	Remediation was verified during the Nike audit on May 3, 2006.	employee list, walkthrough	Completed: No young workers noted at the factory. The youngest worker was 18 years and 4 months. (PLEASE ALSO SEE ABOVE THE SAME NONCOMPLIANCE UNDER CHILD LABOR)					
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																				