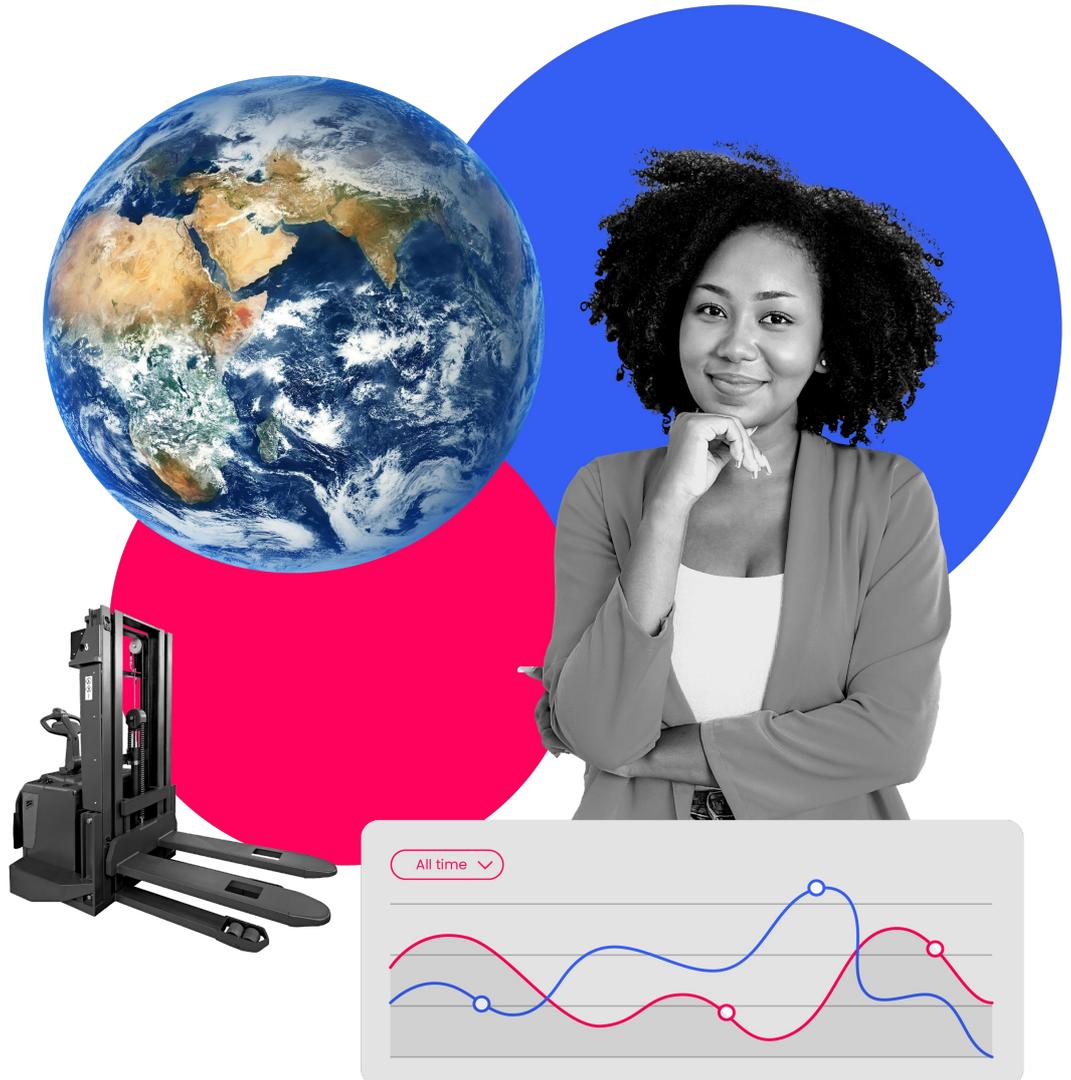


# Sedex Members Ethical Trade Audit Report

Version 7



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## Audit content

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Minimum Requirements were applied and the SMETA Auditor Manual was followed. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the following Code Areas:

### Included in a 2-Pillar audit:

1. Labour Standards Code Areas:
  - 0: Enabling accurate Assessment
  - 1: Employment is Freely Chosen
  - 1.A: Responsible Recruitment & Entitlement to Work
  - 2: Freedom of Association and Right to Collective Bargaining are Respected
  - 4: Child Labour Shall Not be Used
  - 5: Legal Wages are Paid
  - 5.A: Living Wages are Paid
  - 6: Working Hours are Not Excessive
  - 7: No Discrimination is Practiced
  - 8: Regular Employment is Provided
  - 8.A: Sub-contracting and Homeworkers are Used Responsibly
  - 9: No Harsh or Inhumane Treatment is Allowed
2. Health & Safety Code Area:
  - 3: Working Conditions are Safe and Hygienic
3. Environment Code Area:
  - 10.A: Environment 2-Pillar

### Included in a 4-Pillar audit:

1. Labour Standards Code Areas
  - As 2-pillar
2. Health & Safety Code Area
  - As 2-pillar
3. Environment Code Area:
  - 10.A: Environment 2-Pillar
  - 10.B: Environment 4-Pillar
4. Business Ethics Code Area:
  - 10.C: Business Ethics

- (2) Where appropriate, non-compliances or non-conformances were raised where either local law or the Base Code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.
- (3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

# Audit and site details

## Audit details

<b>Sedex company reference</b>	ZC1000839	<b>Auditor company name</b>	SGS Turkey
<b>Date of audit</b>	2025-01-07	<b>Audit conducted by</b>	Sedex member
<b>Audit pillars</b>	Labour Standards   Health and safety   Environment 4-Pillar   Business ethics		

## Site details

<b>Sedex site reference</b>	ZS1004252	<b>Site name</b>	Erte Kozmetik San Tic A S
<b>Business name</b>	ERTE KOZMETIK SAN.TIC.AS	<b>Site address</b>	34310 Cihangir Mah. Güvercin Sok. No:1 & No:5/1 Avcılar, İstanbul, TR
<b>Site phone</b>	05322273443	<b>Site email</b>	pamuk.bilgin@ertecosmetics.com

## Audit parameters

Time in and out	Day 1		Day 2	
	In	09:00	In	09:00
	Out	17:00	Out	13:00
Audit type	Full initial			
Was the audit announced?	Unannounced			
Was the Sedex SAQ available for review?	Yes			
Who signed and agreed CAPR?	Pamuk Durak / İSG Çevre ve Sosyal Uygunluk Yöneticisi / EHS and Social Compliance Executive			
Any conflicting information SAQ/Pre-Audit Info	No			
Is further information available?	No			

## Audit attendance

	Senior management	Worker representative	Union representative
<b>A: Present at the opening meeting?</b>	Yes	Yes	No
<b>B: Present at the audit?</b>	Yes	Yes	No
<b>C: Present at the closing meeting?</b>	Yes	Yes	No
<b>Reason for absence at the opening meeting</b>	Sendika bulunmamaktadır. / There is no union.		
<b>Reason for absence during the audit</b>	Sendika bulunmamaktadır. / There is no union.		
<b>Reason for absence at the closing meeting</b>	Sendika bulunmamaktadır. / There is no union.		

# SMETA declaration

## Auditor team

### SMETA declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.

1. Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform.
2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question.

This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information be gathered and considered from records review, worker interviews, management interviews and visual observation. More information is gathered during the social audit process than is provided here. The audit process is a sampling exercise only and does not guarantee that the audited site prior, during or post-audit, are in full compliance with the Code being audited against. The provisions of this Code constitute minimum and not maximum standards and this Code should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable laws and where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection. The ownership of this report remains with the party who has paid for the audit. Release permission must be provided by the owner prior to release to any third parties.

Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)

Yoktur / None

Lead auditor

Gokhan Murk

APSCA Number

21703624

Additional auditor

ZEYNEP GOKCEN

APSCA Number

32400133

Date of declaration

2025-01-07

## Site representation

<b>Declaration</b>	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
<b>Full name</b>	Pamuk Durak
<b>Title</b>	İSG Çevre ve Sosyal Uygunluk Yöneticisi / EHS and Social Compliance Executive
<b>Date of declaration</b>	2025-01-07

## Summary of findings

Code area	Workplace requirement	Local law	Finding
5. Legal wages are paid	5.B Ensure that workers receive the insurance...		GE <a href="#">ZAF600770139</a>
3. Working conditions are safe and hygienic	3.A Ensure a safe working environment. Put in...		GE <a href="#">ZAF600770140</a>
6. Working hours are not excessive	6.B Ensure workers receive all legally requir...		GE <a href="#">ZAF600770141</a>

## Local law issues

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No local law issues

## Management systems

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

 Not addressed

 Fundamental improvements required

 Some improvements recommended

 Robust management systems

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

 Not addressed

 Fundamental improvements required

 Some improvements recommended

 Robust management systems

# Site details

## Company and site details

Sedex company reference	ZC1000839	
Sedex site reference	ZS1004252	
Company name	ERTE KOZMETIK SAN.TIC.AS	
Business ownership type	GOODS	
Site name	Erte Kozmetik San Tic A S	
Site name in local language	Turkish	
GPS location	GPS address	41°00'05.0"N 28°41'17.1"E
	Coordinates	41.001330, 28.688064
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	Pamuk Durak
	Job title	EHS & Social Compliance Officer
	Phone number	+90 532 227 34 43
	Email	pamuk.bilgin@ertecosmetics.com
Applicable business and other legally required business license numbers and documents	The company has been established in 2 separate buildings both holding separate business licenses, but united under the same tax number. The audit covered both buildings in terms of site tour as well as sampling for the document review and interviews. The center building is called "C Block", the branch building is called "A Block". C Block workplace opening and operating permit: 28.07.2021 - 72716/57; A Block workplace opening and operating permit: 10.06.2021 - 72701/41.	

## Site activities

Site function	Factory Processing/Manufacturer
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## Site activities

<b>Site activities</b>	<b>Primary</b>	Manufacture of soap and detergents, cleaning and polishing preparations, perfumes and toilet preparations
	<b>Secondary</b>	
	<b>Other</b>	
<b>Product type</b>	Personal care and alcoholyses-based products.	
<b>Process overview</b>	Raw material intake, weighing, mixing, manufacturing, filling, packing, shipment.	
<b>What level of mechanization best describes the work at this site?</b>	Fair mechanisation / manual Labour	

## Site scope

<b>Is the audited site a physically continuous area?</b>	No	The company has been established in 2 separate buildings both holding separate business licenses, but united under the same tax number. The audit covered both buildings in terms of site tour as well as sampling for the document review and interviews. The center building is called "C Block", the branch building is called "A Block". The blocks were built in a continuous space, surrounded by shared fence & entrance gate. The door numbers of the buildings are different.
<b>Building 1</b>	<b>Last construction works on site</b>	2021
	<b>If building is shared, provide details</b>	The building is not shared.
	<b>Number of floors</b>	4
	<b>Description of floor activities</b>	Minus 1: Laboratory, mixing-manufacturing department, toilets Floor 0: Reception, warehouse, changing rooms, toilets Floor 1: Laboratory, filling, manufacturing-packing, changing rooms Floor 2: Offices, infirmary, lunch hall

## Site scope

<b>Building 2</b>	<b>Last construction works on site</b>	1989
	<b>If building is shared, provide details</b>	The building is not shared.
	<b>Number of floors</b>	1
	<b>Description of floor activities</b>	Production departments, offices, changing rooms, infirmary are in the base floor. Lunch hall, infirmary, laboratory, offices are in the mezzanine floor.

**Is there any difference between the site scope of the audit and the Sedex site profile?** No

**Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?** Yes  
Please see above explanation to be informed about the building layout of the facility.

**Is any activity conducted onsite not included within the scope of the audit?** No

## Worker accommodation and transport

**Are there any site-provided worker accommodation buildings?** No

**Does the site organise worker transport to the worksite?** Third party  
Contracted transportation company serves the site with commute of the workers. The agreement was made between the center office and the transportation company.

## Work patterns

<b>Approximate workers on site per month (% of peak)</b>	<b>January</b>	75-90%	<b>February</b>	75-90%
	<b>March</b>	75-90%	<b>April</b>	90-95%
	<b>May</b>	95-100%	<b>June</b>	95-100%
	<b>July</b>	95-100%	<b>August</b>	95-100%
	<b>September</b>	95-100%	<b>October</b>	90-95%
	<b>November</b>	90-95%	<b>December</b>	90-95%

## Work patterns

Is there any night or back shift work at the site? No

## Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact? ISO 45001 (OHS), ISO 14001 (Environmental management), Other management system certification, Other certification  
ISO 9001, BRCCP, ISO 22716.

Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community? Yes  
Human rights due diligence implemented.

Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site? Yes  
Human rights due diligence implemented.

# Worker analysis

Gender disaggregated data available

Men and women

## Worker totals

	Men	Women	Other	Total
Number of workers	52 (20.9%)	197 (79.1%)	- -	249 (100%)

## Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	49 (19.7%)	193 (77.5%)	- -	242 (97.2%)
Temporary or fixed term employees	0 (0%)	0 (0%)	- -	0 (0%)
Agency or subcontracted workers	3 (1.2%)	4 (1.6%)	- -	7 (2.8%)
Seasonal workers	0 (0%)	0 (0%)	- -	0 (0%)
Self-employed workers	0 (0%)	0 (0%)	- -	0 (0%)
Informal workers including home workers	0 (0%)	0 (0%)	- -	0 (0%)
Apprentices, trainees or interns	0 (0%)	0 (0%)	- -	0 (0%)

\* % of total workforce

## Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	0 (0%)	0 (0%)	- -	0 (0%)
International migrant workers	0 (0%)	0 (0%)	- -	0 (0%)
<b>Total migrant workers</b>	<b>0 (0%)</b>	<b>0 (0%)</b>	<b>- -</b>	<b>0 (0%)</b>

\* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from N/A

## Workers by age

	Men	Women	Other	Total
18 - 24 years old	2 (0.8%)	24 (9.6%)	- -	26 (10.4%)
15 - 17 years old	0 (0%)	0 (0%)	- -	0 (0%)
Under 15 years old	0 (0%)	0 (0%)	- -	0 (0%)

\* % of total workforce

Is the worker analysis data relevant for peak season and current to the audit? Yes

Please list the nationalities of all workers, with the three most common nationalities listed first Turkish

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Turkish	21%	79%	-	100%

## Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 (0%)	0 (0%)	- -	0 (0%)
Workers paid based on a mix of 'piece work' and hourly rate	0 (0%)	0 (0%)	- -	0 (0%)
Workers paid hourly / daily rate	52 (20.9%)	197 (79.1%)	- -	249 (100%)
Salaried workers	0 (0%)	0 (0%)	- -	0 (0%)

\* % of total workforce

## Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 (0%)	0 (0%)	- -	0 (0%)
Paid weekly	0 (0%)	0 (0%)	- -	0 (0%)
Paid monthly	52 (20.9%)	197 (79.1%)	- -	249 (100%)
Other	0 (0%)	0 (0%)	- -	0 (0%)

\* % of total workforce

If other payment cycle entered, please provide details

N/A (no data entered into "Other" boxes).

## People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	6 (2.4%)	9 (3.6%)	- -	15
Supervisors or team leaders	37 (14.9%)	45 (18.1%)	- -	82
Administrative staff	0 (0%)	0 (0%)	- -	0

# Worker interview summary

Gender disaggregated data available      Men and women

Which methods of worker engagement were used?      Individual interviews  
Group interviews

## Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?

Was the interview sample representative of all types of nationality and employment types of workers?      Yes

Was the interview sample representative of the gender composition of the workforce?      Yes

Number and size of group interviews      4 group interviews implemented each consisting of 5 attendees.

Did workers understand the purpose of the audit?      Yes

Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers?      Yes

Was there any indication that workers had been 'coached' in how they should respond to questions?      No

What was the general attitude of the workers towards their workplace?      Favorable

## Attitude of workers

In which areas did workers raise significant concerns or complaints?	Occupational health risks Other (provide details)  No significant concern on any of the above raised.
What did the workers like the most about working at this site?	Equal opportunities Communication (e.g. from management) Freedom of movement Hours worked, rest days or breaks Work atmosphere (e.g. treatment by supervisors)
Additional comments	None.
Attitude of workers' committee/union representatives	1 employee representative interviewed. He advised that communication channels have been established and functional. No specific complaint raised.
Attitude of managers	Company management was polite and supportive throughout the audit. Full access was given for the site tour, interviews and document review.

## Workers interviewed by type

	Total
Permanent workers	25
Temporary or fixed-term employees	0
Agency or subcontracted workers	1
Seasonal workers	0
Other workers	0
<b>Total number of workers interviewed</b>	<b>26</b>

## Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	6	14	-	20

### Workers interviewed by group/individual

Workers interviewed individually	5	1	-	6
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### Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	0	0	-	0
International migrant workers interviewed	0	0	-	0
<b>Total migrant workers interviewed</b>	<b>0</b>	<b>0</b>	<b>-</b>	<b>0</b>

# Measuring workplace impact

Gender disaggregated data available      Men and women

## Annual worker turnover (%)\*

	Men	Women	Other	Total
Last full quarter (90 days)	2.0%	2.7%	-	4.7%
Last full calendar year (2024)	11.0%	27.0%	-	38.0%
Previous full calendar year (2023)	14.0%	37.0%	-	51.0%

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

## Rate of absenteeism (%)\*

	Men	Women	Other	Total
Last full quarter (90 days)	1.0%	2.5%	-	3.5%
Last full calendar year (2024)	30.0%	70.0%	-	100.0%
Previous full calendar year (2023)	2.1%	4.5%	-	6.6%

\* Number of days lost through job absence in the year, calculated as (the number of employees on 1st day of the year + number employees on the last day of the year) / 2)\* number available workdays in the year\*100

Are accidents recorded?      Yes

Workplace related accidents are recorded and notified to the relevant state office.

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

	Men	Women	Other	Total
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### Annual number of work related accidents and injuries (per 100 workers)\*

Last full quarter (90 days)	0.1%	0.2%	-	0.3%
Last full calendar year (2024)	0.36%	0.9%	-	1.26%
Previous full calendar year (2023)	0.32%	0.88%	-	1.2%

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

### Lost day work cases (per 100 workers)\*

	Men	Women	Other	Total
Last full quarter (90 days)	1.0%	1.5%	-	2.5%
Last full calendar year (2024)	7.0%	11.5%	-	18.5%
Previous full calendar year (2023)	1.0%	1.5%	-	2.5%

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

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

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

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

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

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

Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

# 0. Enabling accurate assessment

## Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			
<b>Systems and evidence examined to validate this code section</b>	Document & record review as well as interviews implemented during the audit to collect evidence of compliance. The company had human rights policy that was announced internally and externally. All employees had access to the policy that was posted in the intranet of the company; were given training too. No obstruction attempts to the auditor practiced. Company management and the responsible officers were supportive during the audit. Site description with all details provided clearly and completely that was confirmed to be correct during the audit.		

0. Enabling accurate assessment

## Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment?

No

Did any workers selected by the auditor decline to be interviewed?

No

Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?

Yes

Required documents provided.

# 1. Employment is freely chosen

## Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>Policy preventing forced labor established and communicated in the workplace. EHS &amp; social compliance officer assigned officially as the executor of all workplace policies &amp; related procedures. Job role defined. Documented implementation procedures and other workplace rules communicated to the employees at job start; also, training given (the most recent training -01.11.2024 dated- record was seen). Overall assessment showed that the top management ensures the policies, workplace rules and the base commitments related to those policies have become practical/operational in the workplace and no gap observed remarkably weakening the implementation of the management system in terms of mostly visible clauses of the Code.</p>

## Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section	<p>Employment is freely chosen.            No guards present during working hours.            Movement of employees at the facility is not prohibited or limited.            Employees have free access to toilets and drinkable water.            Overtimes are always performed on voluntary basis.            The factory does not require deposit or withhold employees' ID cards.            The factory does not limit the employees' freedom.            There is no forced, bonded or involuntary prison labor.            Employees are free to leave their employer after reasonable notice.</p>		



1. Employment is freely chosen

## Data points

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If required under local law, is there a published 'modern slavery' or similar statement?	Not Applicable
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Does the site utilise any workers who are prisoners?	No
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Does the site use the labour of persons required to work under any government scheme?	No
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# 1.A. Responsible recruitment and entitlement to work

## Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Policy on responsible employment was established and communicated in the workplace. EHS & social compliance officer assigned officially as the executor of all workplace policies & related procedures. Job role of the individual established. Documented implementation procedures and other workplace rules communicated to the employees at job start. Recently, training on the topic has been provide them too. Overall assessment showed that the top management ensures the policies, workplace rules and the base commitments related to those policies have become practical/operational in the workplace and no gap observed remarkably weakening the implementation of the management system in terms of mostly visible clauses of the Code.

## Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

**Systems and evidence examined to validate this code section**

The company doesn't have recruitment agency partner. All employees are either their own employee or present in the factory as contractors' staff. The details given in the relevant section as breakdown of the figures.  
Sampling bundle was inclusive of contractor employees.  
All worker files had the necessary papers proving the relevant individuals had the right to work in the company. The files had ID copies, state office employment statements, work contracts, birth and marriage records, legally allowed security scan papers and other necessary paperwork for the legal employment.  
No recruitment fee is paid by the employees (no such event reported or such evidence confronted during document review).  
Interviewees confirmed their responsibility in the workplace corresponding to what was told them at recruitment stage. No opposing case was observed during the audit.  
No child or illegal young labor employment was detected during the audit.

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## 1.A. Responsible recruitment and entitlement to work

### Data points

#### Labour hire

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

#### Migrant workers

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

#### Recruitment fees

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process? No  
Not detected.

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Were recruitment fees or costs identified during worker interviews? No  
Not identified.

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

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Freedom of association policy established and communicated in the workplace. EHS & social compliance officer has been assigned officially as the executor of all workplace policies & related procedures with job description established as relevant. Documented implementation procedures and other workplace rules communicated to the employees at job start in booklets in detail. Also, refreshment trainings provided. The most recent training date is 01.11.2024. Overall assessment showed that the top management ensures the policies, workplace rules and the base commitments related to those policies have become practical/operational in the workplace and no gap observed remarkably weakening the implementation of the management system in terms of mostly visible clauses of the Code.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section			No evidence of was detected demonstrating top management prevents association of employees or to bargain collectively. Worker representatives were elected by employees freely. Worker representative interview confirmed that no intervention from the management in performing the duty. Company established freedom of association policy and posted it in the workplace with training provided for the employees.



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

### Data points

Are trade unions allowed by law in the national context? No

Are there any registered trade unions in the workplace? No

Are they active?

Does the employer recognise the trade union? Not Applicable

Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)? Yes

Are the worker representatives freely elected by the workforce as a whole? Yes

Does union/worker committee membership reflect the gender composition of the workforce? Not Applicable

Does the membership reflect the nationality composition of the workforce? Not Applicable

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

### 3. Working conditions are safe and hygienic

#### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>OHS policy was established and communicated in the workplace. All policies &amp; relevant implementation method &amp; tools are given to the employees at hiring phase. Implementation procedures were in line with the local legislative mandating requirements that benefit of state level surveillance.</p> <p>Officially, ESH &amp; social compliance officer has been assigned as the executer of all workplace policies &amp; related procedures including OHS. Job role of the relevant person defined.</p> <p>Expense authority, especially for instalment projects mostly require head office review &amp; confirmation process that extend the duration of the feasibility stage and the final decision taking stage.</p> <p>Documented implementation procedures and other workplace rules communicated to the employees at job start. Also, regular refreshment trainings provided with records retained.</p> <p>Overall assessment showed that the top management ensures the policies, workplace rules and the base commitments related to those policies have become practical/operational in the workplace and no gap observed remarkably weakening the implementation of the management system in terms of mostly visible clauses of the Code yet, no systematic review of the operational performance of the management system in place which should enable to open improvement channels and probable feedback from the employees.</p>

#### Summary of findings

Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3.A Ensure a safe working environment. Put in...		GE <a href="#">ZAF600770140</a>

**Systems and evidence examined to validate this code section**

Workplace doctor and OHS expert contracts were seen. They were registered to the Ministry official database system.  
Periodical inspection of pressured vessels and lifting-transmitting equipment were made.  
Up to date fire & evacuation drill records available.  
Firefighting system (water system, detection-warning system, fire extinguishers) periodical control reports available.  
Grounding installation & indoor electricity installation system as well as lightning rod were inspected.  
OHS risk evaluation implemented in documented way.  
Emergency preparedness plan prepared and documented. Emergency response team established.  
OHS training are periodically given to the employees.  
Drinking water analyses were made by 3rd party authorized lab.  
Indoor environment measurements implemented and report issued.  
There were enough number of first aid trained employee in the company; certificates were seen.

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## Findings: good examples

ZAF600770140

Good example

### Code area

3 Working conditions are safe and hygienic

### Workplace requirement

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

### Description

Çalışanlara ücretsiz tamamlayıcı sağlık sigortası hizmeti sağlanmaktadır. // Employees are provided with free health insurance.

### 3. Working conditions are safe and hygienic

## Data points

Is someone within the company responsible for health and safety?	Yes, senior manager or business owner Yes, qualified safety officer
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	Yes
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	Yes  Production process involves in chemical handling. Necessary protective measures are taken.
Who organises accommodation for workers?	Not applicable
Who organises worker transportation between accommodation and worksite?	Not applicable
Who organises worker transportation while at work?	Third party (agency or recruitment partner)
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Yes  Building occupancy permits available: 21.06.2021 - 39, 21.07.1987 - 87/3833, 28.09.1989 - 17-4, 21.07.1987 - 87/3833
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No
Does the site have a structural engineer evaluation?	Yes

## 4. Child labour shall not be used

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>Policy prohibiting the existence of child labor was established and communicated in the workplace.</p> <p>EHS &amp; social compliance officer assigned officially as the executor of all workplace policies &amp; related procedures. Job role defined with responsibilities.</p> <p>Due to ETI Code management representative is human resources professional, high-level implementation of the hiring procedures in place.</p> <p>Documented implementation procedures and other workplace rules communicated to the employees at job start.</p> <p>Overall assessment showed that the top management ensures the policies, workplace rules and the base commitments related to those policies have become practical/operational in the workplace and no gap observed remarkably weakening the implementation of the management system in terms of mostly visible clauses of the Code.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section			There was no child worker on site. Youngest worker was 18 years old. There's a child labor policy of the company. Employees are given training on child labor that was based on ETI Base Code, relevant local legislation requirements, relevant ILO conventions. Records of the training were seen.

4. Child labour shall not be used

## Data points

Percentage of workers that are age 24 or younger 10%

Enter the legal age of employment 15

Enter the age of the youngest worker identified 18

Enter the number of workers under local legal minimum age 0

Enter the number of workers under 15 years old 0

Percentage of workers that are apprentices, trainees or interns 0%

Were there children present on the work floor but not working at the time of audit? No

Do children live at the accommodation provided to workers? No

## 5. Legal wages are paid

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>Remuneration policy established and communicated in the workplace. Also, during hiring stage, candidates informed about the wage policy of the company. EHS &amp; social compliance officer assigned officially as the executor of all workplace policies &amp; related procedures. Job role defined with responsibilities. Documented implementation procedures and other workplace rules communicated to the employees at job start. Overall assessment showed that the top management ensures the policies, workplace rules and the base commitments related to those policies have become practical/operational in the workplace and no gap observed remarkably weakening the implementation of the management system in terms of mostly visible clauses of the Code.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
5. Legal wages are paid	5.B Ensure that workers receive the insurance...		GE <a href="#">ZAF600770139</a>
Systems and evidence examined to validate this code section	<p>Wages are paid on time as reported by interviewed employees on the 1st day of each month via personal bank accounts of the personnel. Advance payment also can be made upon request. All employees of are given detailed pay slip. Sampled employees were insured with SGK (Social Security Foundation) register in terms of health, pension, nonemployment fund premium charges of the employer share. No employee detected with the wage below legal minimum legal wage. All employees are paid above the legal minimum wage, regularly &amp; stable way and in local tender.</p>		



## Findings: good examples

ZAF600770139

Good example

### Code area

5 Legal wages are paid

### Workplace requirement

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

### Description

- 1) Çalışanlara ücretsiz yemek ve yol hizmeti sağlanmaktadır. // Employees are provided with free meal and transportation service.
- 2) Çalışanlara yılda 4 kere her biri 4000 TL tutarında ikramiye verilmektedir. // Employees are provided with premium pay for 4 times a year (that each is worth of 4000 TRY).

## 5. Legal wages are paid

### Data points

What is the basic wage paid to workers?	Wages are based on job skills and experience
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Only digital payments
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	None

### Worker remuneration

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

Is legal wage/legally recognised CBAs data available for any of these options?	Monthly	
Is actual wage data available on site for any of these options?	Monthly	
Maximum legal working hours	Max hours per day	Non applicable
	Max hours per week	45.0
	Max hours per month	225.0
Actual required working hours	Required hours per day	9.0
	Required hours per week	45.0
	Required hours per month	225.0
Maximum legal overtime hours	Max hours per day	Non applicable
	Max hours per week	Non applicable
	Max hours per month	Non applicable

Actual overtime hours	Max hours per day	9.0
	Max hours per week	9.0
	Max hours per month	18.0
Minimum legal wage	Min per hour	75.56
	Min per day	566.73
	Min per week	3967.16
	Min per month	17002.12
Actual minimum wage	Actual per hour	84.0
	Actual per day	630.0
	Actual per week	4410.0
	Actual per month	18900.0
Minimum legal overtime wage	Min per hour	113.34
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum overtime wage	Actual per hour	126.0
	Actual per day	1134.0
	Actual per week	1134.0
	Actual per month	2268.0

## Wage analysis

Number of workers' records checked	26
Provide the date and details of the records	26 employees' July 2024, October 2024, December 2024 working hours and wage records as well as social insurance pay records reviewed.
Are there different legal minimum/ legally recognised CBAs wage grades?	No

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<b>For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?</b>	Above legal minimum
<b>Indicate the breakdown of workforce per earnings</b>	All employees earn above the legal minimum wage rate.
<b>Are there any bonus schemes used?</b>	Yes Employees are given 4000 TRY net 4 times a year.
<b>Were accurate records shown at the first request?</b>	Yes
<b>Were any inconsistencies found?</b>	No

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## 5.A. Living wages are paid

### Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			
<b>Systems and evidence examined to validate this code section</b>	The company established well managed wage analysis policy and implementation procedure where the top management closely involved. The minimum wage in the company is above the legally mandated minimum wage of the country. Additionally, the company provide all employees with bonus payment 4 times a year each being 4000 TRY net.		

## 6. Working hours are not excessive

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>Working hours policy was formed and communicated in the workplace. Also, during hiring stage, candidates informed on working hours patterns of the company.</p> <p>EHS &amp; social compliance officer assigned officially as the executor of all workplace policies &amp; related procedures. Job role of the individual defined.</p> <p>Documented implementation procedures and other workplace rules communicated to the employees at job start as a handbook that covers working hours scheme &amp; other binding rules of the company.</p> <p>Overall assessment showed that the top management ensures the policies, workplace rules and the base commitments related to those policies have become practical/operational in the workplace and no gap observed remarkably weakening the implementation of the management system in terms of mostly visible clauses of the Code.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
6. Working hours are not excessive	6.B Ensure workers receive all legally requir...		GE <a href="#">ZAF600770141</a>
Systems and evidence examined to validate this code section	<p>Regular working hours:            08.00-18.00 with 60 minutes daily break for the production employees. Security staff's working hours were set as follows:            07.00-15.00 / 15.00-23.00 / 23.00-07.00. Both attains weekly 45 hours regular.            Working hours recorded by personal card reader.            Overtime was implemented voluntarily as reported by the interviewees.            Regular working hours policy established.</p>		



## Findings: good examples

ZAF600770141

Good example

### Code area

6 Working hours are not excessive

### Workplace requirement

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

### Description

Çalışanlara takip eden 3 ay içinde kullanabilecekleri ücretli doğum günü izni ile Dünya Engelliler Günü hasebiyle ilgili personele ücretli izin verilmektedir. // Employees are given paid birthday leave to utilize within the following 3 months-time. Also, the relevant individuals given paid leave in the International Day of Persons with Disabilities.

## 6. Working hours are not excessive

### Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	150%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	No
Excluding overtime, what are the regular working hours per week for workers at this site?	45.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	47.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	54.0
Maximum number of days worked without a day off in sample	6

## 7. No discrimination is practiced

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>Anti-discrimination policy defined and communicated in the workplace. EHS &amp; social compliance officer assigned officially also as the executor of all workplace policies &amp; related procedures. Job role defined with responsibilities. Documented implementation procedures and other workplace rules communicated to the employees at job start. On 01.11.2024, training covering anti-discrimination policy of the company was delivered in the company. Effectiveness of the trainings implemented.</p> <p>Overall assessment showed that the top management ensures the policies, workplace rules and the base commitments related to those policies have become practical/operational in the workplace and no gap observed remarkably weakening the implementation of the management system in terms of mostly visible clauses of the Code.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section			<p>Policy and implementation procedure banning all kinds of discrimination was established.</p> <p>There was no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation. Employees were/are given training on discrimination-related issue, visible &amp; nonvisible forms of discrimination as well as harassment &amp; gender equity related topics.</p>



7. No discrimination is practiced

## Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)?	0%
Representation of women in managerial roles (ratio of women workers to women managers)	4%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	22%
Three most common nationalities in managerial and supervisory roles	Turkish

## 8. Regular employment is provided

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>Written procedures for regular employment established and communicated in the workplace.          Employees are given all relevant paperwork at hiring stage.          EHS &amp; social compliance officer assigned officially also as the executor of all workplace policies &amp; related procedures. Job role defined.          No authority and resource need deemed necessary to define in the job definition as local/international regulations as well as customer expectations were referred to for ensuring all necessary resources guaranteed.          Documented implementation procedures and other workplace rules communicated to the employees at job start (the employees were given workplace rules &amp; ethics principles booklet of the company).          Overall assessment showed that the top management ensures the policies, workplace rules and the base commitments related to those policies have become practical/operational in the workplace and no gap observed remarkably weakening the implementation of the management system.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

**Systems and evidence examined to validate this code section**

All workers have their well-prepared personal files and signed labor contracts that were indefinite time.  
Sampled employees had required working permits.  
Labour contracts include relevant working practices and rules and communicated to the employees at work start.  
No migrant employee available.  
No agency hired employee available.  
No recruitment fee was detected; nor reported by the interviewees.

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## 8. Regular employment is provided

### Data points

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Percentage of workers that are permanently or temporarily employed	97.19%
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Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment	2.81%
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Percentage of workers employed as apprentices, trainees or interns	0.0%
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## 8.A. Sub-contracting and homeworkers are used responsibly

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	ETI Code embedded in the local policy structure of the company instead of establishing separate policy. EHS & social compliance officer assigned officially also as the executor of all workplace policies & related procedures. Job role of the individual defined. Documented implementation procedures and other workplace rules communicated to the employees at job start. Overall assessment showed that the top management ensures the policies, workplace rules and the base commitments related to those policies have become practical/operational in the workplace and no gap observed remarkably weakening the implementation of the management system.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section			There is no subcontracted process in the company. Cosmetics manufacturing processes implemented in continuous production lines / closed systems that are subject to temperature & pressure control. No sign of outsourced process was detected during the audit. All processes implemented inhouse.

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

### Data points

Are homeworkers employed directly or engaged through an agent? Not applicable

Gender disaggregated data available

#### Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homemaker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers? No  
Not detected; nor reported.

#### Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity? No  
No such concern evolved during the audit.

Are any sub-contractors used? No

## 9. No harsh or inhumane treatment is allowed

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>The policy of the issue was established and communicated in the workplace. EHS &amp; social compliance officer assigned officially also as the executor of all workplace policies &amp; related procedures. Job role defined with responsibilities. Other policies &amp; procedures were referred to (e.g., internal workplace regulation that bans harsh attitudes in the workplace) for the source of power of the required authority. Documented implementation procedures and other workplace rules communicated to the employees at job start. Overall assessment showed that the top management ensures the policies, workplace rules and the base commitments related to those policies have become practical/operational in the workplace and no gap observed remarkably weakening the implementation of the management system in terms of mostly visible clauses of the Code.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section			There was no evidence of physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation which confirmed by worker interviews. Confidential grievance mechanism was in place.

9. No harsh or inhumane treatment is allowed

## Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?	<p>Yes, there is a formal grievance process</p> <p>The grievance process is available to all workers</p>
What type of grievance mechanism(s) are available?	Suggestion boxes available. Also, open door policy executed as well as employee representatives act as grievance lodger during manage
Number of grievances raised in the last 12 months	10
Number of grievances resolved in the last 12 months	10

## 10.A. Environment 2-Pillar

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>Environment policy was established and communicated in the company. EHS &amp; social compliance officer assigned officially also as the executor of all workplace policies &amp; related procedures. including ETI Code. Job role defined with responsibilities, but without authorities and assigned resources on environment topics as it requires profession and was delegated to vocationally trained professionals in the workplace.</p> <p>Documented implementation procedures and other workplace rules communicated to the employees at job start.</p> <p>Overall assessment showed that the top management ensures the policies, workplace rules and the base commitments related to those policies have become practical/operational in the workplace.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

**Systems and evidence examined to validate this code section**

Environmental impact assessment letter was seen.  
Environmental permit available.  
Environmental policy established.  
The most recent air emission analysis report issued; all results read compliant.  
Industrial waste management plan available.  
Waste declaration for 2023 available.  
Temporary hazardous waste storing permit available.  
Environmental aspect-impact assessment implemented & documented.  
Stakeholders environmentally binding rules known and adapted to regular business operations as confirmed by the relevant procedures and related operational activities.  
Company implements its environmental activities in line with the local and international known legislations & regulations.

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10.A. Environment 2-Pillar

## Data points

<p>Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?</p>	<p>No</p>
<p>Does the site have any valid environmental or energy management certificates?</p>	<p>ISO 14001 certificate available (CU-TUR-0049/ERT/EMS/29.12.2025).</p>
<p>Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?</p>	<p>No</p>
<p>Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?</p>	<p>No</p>

## 10.B. Environment 4-Pillar

### Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
<b>Systems and evidence examined to validate this code section</b>	Environmental aspect-impact assessment was implemented and related risk management tools discussed with evidence of implementation kept. Environmental policy established and communicated to relevant stakeholders. Natural sources established and results monitored. The company owns the land and relevant permits available protecting purpose of the soil. Regular (monthly & annually) environmental audits implemented resulting to official report issuance covering metrics relating to environmental performance/legal requirements.		

## 10.B. Environment 4-Pillar

### Data points

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes
What additional specific environmental policies does the site capture?	Biodiversity and eco system impact management Sustainable material sourcing Circular economy and resource efficiency Prioritising local suppliers Zero-waste and recycling protocols Switching to renewable energy sources Responsible use and management of water Packaging optimization
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes Regulation scanning implemented regularly.
Does the site have reduction targets in place to manage climate related risks?	Yes, to reduce scope 1 greenhouse gases (GHGs)
Are any of these science-based targets?	No, but we anticipate setting one in the next two years
Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?	No
Has the site checked that any sub-contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	Yes Supplier monitoring system in place.

### Usage/discharge analysis

	Last full calendar year (2024)	Previous full calendar year (2023)
Total electricity consumption from non-renewable sources (kWh)	1,176,711.6	163,013

Total electricity consumption from renewable sources (kWh)	568,180	408,699
Sources of renewable energy used	Onsite generated	Onsite generated
Types of renewable energy used	Solar	Solar
Total natural gas consumption (kWh)	324,596.5	425,890.3
Usage of other purchased fuels	10471.84	13736.12
Has the site completed any carbon footprint analysis?	Yes	Yes
	Scope 1: 0 (tCO <sub>2</sub> e) Scope 2: 0 (tCO <sub>2</sub> e) Scope 3: 0 (tCO <sub>2</sub> e)	Scope 1: 0 (tCO <sub>2</sub> e) Scope 2: 0 (tCO <sub>2</sub> e) Scope 3: 0 (tCO <sub>2</sub> e)
Water sources	Mains water	Mains water
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	8,966	8,858
Water discharged	Municipal sewer	Municipal sewer
Water volume discharged (m3)	7,645	7,502
Water volume recycled (m3)	0	0
Total waste produced (mt)	302	196.8
Total hazardous waste produced (mt)	31.2	50.7
Waste to recycling (mt)	158.9	22.7
Waste to landfill (mt)	111.8	123.3
Waste to other (mt)	0	0
Total product produced (mt)	6,500,000	4,300,000



## 10.C. Business ethics

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>Business ethics issue was incorporated by the corporate policies of the company. Relevant implementation procedure was established as disciplinary regulation, job definitions and company rules booklets that were distributed/communicated to the employees.</p> <p>ESH &amp; social compliance officer was assigned as all workplace policy executer, where necessary, having the right of delegating to other departments proportional to the level of the necessity evolved.</p> <p>Policy &amp; procedures communicated to the employees. External stakeholders were/are informed with the ethics rules of the company via contracts, informative correspondences.</p> <p>Top management closely monitor workplace rules implementation performance via regularly implemented board/top management meetings with the results circulated among the employees at all levels that are commensurate with their relevancy.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

**Systems and evidence examined to validate this code section**

Business ethics related topics covering policies established and communicated in the workplace.  
There are monthly implemented employee representatives-management representatives' sessions in the company with minutes retained.  
No unethical behavior evidence of the company was observed during the whole audit process.  
Business ethics training given to the key personnel; 31.10.2024 dated attendance record of the participants was seen.  
No illegal transaction or fined trading activity record observed or reported during the audit.  
Confidential reporting channel available and communicated enabling reporting illegal activities.

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## 10.C. Business ethics

### Data points

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Has the site received an official notice, fine or prosecution for any non-compliances with business ethics legislation, regulation, consent or permits (within the last three years)?

No

Provide any certified anti-bribery management systems for the site

No certified anti-bribery management system available.

# Attachments



[Wash Sinks.jpg](#)



[Ventilation and Sprinkler Instalment.jpg](#)



[Waste Segregation Bins.jpg](#)



[Waste Storing.jpg](#)



[Waste Storing Room.jpg](#)



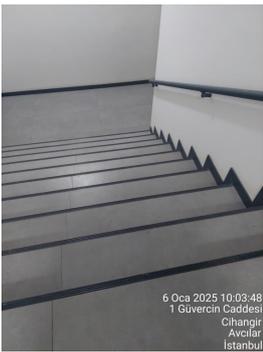
[Transformer.jpg](#)



[Finished Product Storing Room.jpg](#)



[Waste Effluent Tanks.jpg](#)



[Stairs with Non-slip Stripes.jpg](#)



[Suggestion Box.jpg](#)



[Sprinkler.jpg](#)



[Shelf Loading Capacity.jpg](#)



[Shelf Stowing.jpg](#)



[Medication Box.jpg](#)



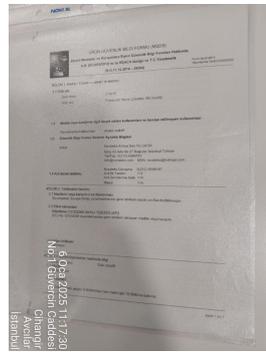
[Personal Card Reader.jpg](#)



[Lavatory.jpg](#)



[Passage Between Blocks.jpg](#)



[SDS.jpg](#)



[Lunch Hall.jpg](#)



[Laboratory.jpg](#)



[Foam Extinguishing System.jpg](#)



[Infirmary.jpg](#)



[Forklift Driving Route.jpg](#)



[Floor Exit.jpg](#)

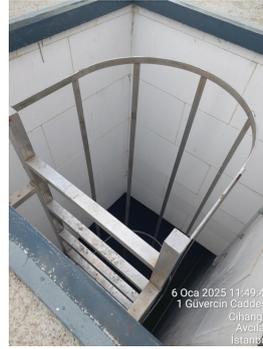




[Fire Alarm Button.jpg](#)



[Fire Hose.jpg](#)



[Fire Engine Room Underground.jpg](#)



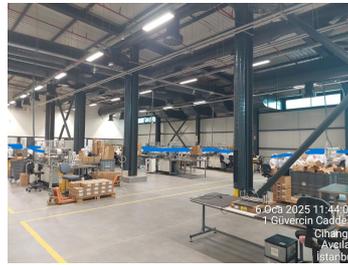
[Filling Packing Department\\_1.jpg](#)



[Fire Extinguisher.jpg](#)



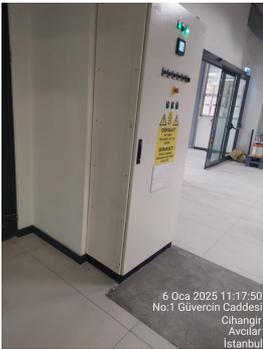
[Eye Shower.jpg](#)



[Filling Packing Department\\_2.jpg](#)



[Emergency Escape Plan.jpg](#)



[Electricity Board.jpg](#)



[Electricity Generator.jpg](#)



[Drinking Water Supply.jpg](#)



[Drinking Water.jpg](#)



6 Oca 2025 10:08:16  
No:1 Güvercin Caddesi  
Cihangir  
Avciilar  
Istanbul

[Crash Bumpers.jpg](#)



6 Oca 2025 09:50:10  
No:1 Güvercin Caddesi  
Cihangir  
Avciilar  
Istanbul

[Cooking Hood with Automated Extinguisher.jpg](#)



6 Oca 2025 11:36:14  
5 Ubay İş Merkezi  
Cihangir  
Avciilar  
Istanbul

[Chemical Storing Matrix.jpg](#)



6 Oca 2025 11:35:58  
5 Ubay İş Merkezi  
Cihangir  
Avciilar  
Istanbul

[Chemical Store House.jpg](#)



6 Oca 2025 11:21:07  
No:1 Güvercin Caddesi  
Cihangir  
Avciilar  
Istanbul

[Compressor Air Tank.jpg](#)



6 Oca 2025 11:34:28  
1 Güvercin Caddesi  
Cihangir  
Avciilar  
Istanbul

[Chemical Preparation Tanks.jpg](#)



6 Oca 2025 11:50:41  
No:1 Güvercin Caddesi  
Cihangir  
Avciilar  
Istanbul

[C Block External View.jpg](#)



6 Oca 2025 09:53:53  
No:1 Güvercin Caddesi  
Cihangir  
Avciilar  
Istanbul

[Detector and Siren.jpg](#)



6 Oca 2025 11:21:27  
No:1 Güvercin Caddesi  
Cihangir  
Avciilar  
Istanbul

[Assembly Point.jpg](#)



6 Oca 2025 11:20:17  
No:1 Güvercin Caddesi  
Cihangir  
Avciilar  
Istanbul

[Building Alternative Exit.jpg](#)



6 Oca 2025 11:35:18  
1 Güvercin Caddesi  
Cihangir  
Avciilar  
Istanbul

[Bulk Alcohol Storing Underground Tanks.jpg](#)



6 Oca 2025 11:31:13  
1 Güvercin Caddesi  
Cihangir  
Avciilar  
Istanbul

[Changing Room.jpg](#)



[A Block Backyard View.jpg](#)



[Emergency Exit Signboard.jpg](#)



[Company Frontage View- A Block-.jpg](#)





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