

SMETA Corrective Action Plan Report (CAPR)

Version 6.1





	Αι	Jdit D	etails			
Sedex Company Reference: (only available on Sedex System)	eference: değil (d only available on Sedex S		Sedex Site Reference: (only available on Sedex System)		ZS: No değil	o member/Üye
Business name (Company name):	FAMATEKS TEKSTİL PAZ.SAN.VE TİC .LTD.ŞTİ					
Site name:	FAMATEKS TEKSTIL PAZ SAN VE TIC LTD STI					
Site address: (Please include full address)	BARBOROS MAH. CAFER ÖZER CAD.N 24 MERKEZEFENDİ /DENİZLİ	CAD.NO		try:		YE /TURKEY
Site contact and job title:	ALİ ACAR / PAZARLA		MÜDÜRÜ /SALE	s manager	२	
Site phone:	90 258 3857586		Site e-mail:		Ali.ac	ar@famateks.com
SMETA Audit Pillars:	Labour Standards	Safe	ealth & Denvironr ty (plus 4-pillar onment 2-)		nent	Business Ethics
Date of Audit:	15/12/2021					

Audit Company Name & Logo: TÜV RHEINLAND TURKEY

Report Owner (payer):



FAMATEKS TEKSTİL PAZ.SAN.VE TİC .LTD.ŞTİ

Audit Conducted By								
Affiliate Audit Company		Purchaser		Retailer				
Brand owner		NGO		Trade Union				
Multi– stakeholder				Combined Audit (select all that apply)				



Audit Content:

- (1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 (March 2019) was applied. 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.
- (2) The audit scope was against the following reference documents

2-Pillar SMETA Audit

- ETI Base Code
- SMETA Additions
 - Universal rights covering UNGP
 - Management systems and code implementation,
 - Responsible Recruitment
 - Entitlement to Work & Immigration,
 - Sub-Contracting and Home working,

4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)
- (3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.



SMETA Declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Best Practice Guidance and SMETA Measurement Criteria.

- (1) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (2) Any Non-Compliance against customer code alone shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

Any exceptions to this must be recorded here (e.g. different sample size): N/A

Auditor Team (s) (please list all including all interviewers): Lead auditor: SERKAN AK (LEAD AUDİTOR) Team auditor: İNCİ AYDIN (TEAM MEMBER) Interviewers: SERKAN AK

Report writer: İNCİ AYDIN Report reviewer: Snowy ZHENG

Date of declaration: 15/12/2021

Note: The focus of this ethical audit is on the ETI Base Code and local law. The additional elements will not be audited in such depth or scope, but the audit process will still highlight any specific issues.

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 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.



Audit Parameters

	Audit Parameters					
A: Time in and time out	Day 1 Time in: 09.00 Day 1 Time out:14:30	Day 3 Time in: N/A Day 3 Time out:N/A				
B: Number of auditor days used:	2 Auditors x0.5 Day (1 Man I	Day)				
C: Audit type:	 Full Initial Periodic Full Follow-up Partial Follow-Up Partial Other If other, please define: 					
D: Was the audit announced?	 Announced Semi – announced: Window detail: 2 weeks Unannounced 					
E: Was the Sedex SAQ available for review?	Yes No If No, why not					
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	 ☐ Yes ☑ No If Yes, please capture detail 	il in appropriate audi	t by clause			
G: Who signed and agreed CAPR (Name and job title)	ALİ ACAR / PAZARLAMA MÜ	jdürü /Sales mana	GER			
H: Is further information available (if yes, please contact audit company for details)	☐ Yes ⊠ No					
I: Previous audit date:	NONE					
J: Previous audit type:	NONE					
K: Were any previous audits reviewed for this audit	□ Yes □ No					

Audit attendance	Management	Worker Representatives			
	Senior management	Worker Committee representatives	Union representatives		
A: Present at the opening meeting?	🛛 Yes 🗌 No	🛛 Yes 🗌 No	🗌 Yes 🖾 No		



B: Present at the audit?	🛛 Yes 🗌 No	Yes 🗌 No	🗌 Yes 🛛 No			
C: Present at the closing meeting?	🛛 Yes 🗌 No	Yes 🗌 No	🗌 Yes 🖾 No			
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	There was one worker opening, closed meet	•	e participated udit. (Please look NC 2)			
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	There was no union in the facility. İşletmede sendika bulunmamaktadır					

Guidance

The Corrective Action Plan Report summarises the site audit findings and a corrective, and preventative action plan that both the auditor and the site manager believe is reasonable to ensure conformity with the ETI Base Code, Local Laws and additional audited requirements. After the initial audit, the form is used to re-record actions taken and to categorise the status of the non-compliances.

N.B. observations and good practice examples should be pointed out at the closing meeting as well as discussing non-compliances and corrective actions.

To ensure that good practice examples are highlighted to the supplier and to give a more 'balanced' audit a section to record these has been provided on the CAPR document (see following pages) which will remain with the supplier. They will be further confirmed on receipt of the audit report.

Root cause (see column 4)

Root cause refers to the specific procedure or lack of procedure which caused the issue to arise. Before a corrective action can sustainably rectify the situation, it is important to find out the real cause of the non-compliance and whether a system change is necessary to ensure the issue will not arise again in the future.

See SMETA BPG Chapter 7 'Audit Execution' for more explanation of "root cause".

Next Steps:

- 1. The site shall request, via Sedex, that the audit body upload the audit report, non-compliances, observations and good examples. If you have not already received instructions on how to do this then please visit the web site <u>www.sedexglobal.com</u>.
- 2. Sites shall action its non-compliances and document its progress via Sedex.
- 3. Once the site has effectively progressed through its actions then it shall request via Sedex that the audit body verify its actions. Please visit <u>www.sedexglobal.com</u> web site for information on how to do this.
- 4. The audit body shall verify corrective actions taken by the site by either a "Desk-Top" review process via Sedex or by Follow-up Audit (see point 5).
- 5. Some non-compliances that cannot be closed off by "Desk-Top" review may need to be closed off via a "1 Day Follow Up Audit" charged at normal fee rates. If this is the case, then the site will be notified after its submission of documentary evidence relating to that non-compliance. Any follow-up audit must take place within twelve months of the initial audit and the information from the initial audit must be available for sign off of corrective action.
- 6. For changes to wages and hours to be correctly verified it will normally require a follow up site visit. Auditors will generally require to see a minimum of two months wages and hours records, showing

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new rates in order to confirm changes (note some clients may ask for a longer period, if in doubt please check with the client).



Corrective Action Plan

			Corrective	Action Plan – nor	n-compliand	ces			
Non- Compliance Number The reference number of the non-compliance from the Audit Report, for example, Discrimination No.7	New or Carried Over Is this a new non- compliance identified at the follow-up or one carried over (C) that is still outstanding	Details of Non- Compliance Details of Non-Compliance	Root cause (completed by the site)	Preventative and Corrective Actions Details of actions to be taken to clear non-compliance, and the system change to prevent re- occurrence (agreed between site and auditor)	Timescale (Immediate, 30, 60, 90, 180,365)	Verification Method Desktop / Follow-Up [D/F]	Agreed by Management and Name of Responsible Person: Note if management agree to the non- compliance, and document name of responsible person	Verification Evidence and Comments Details on corrective action evidence	Status Open/Closed or comment
NC -1 OB Management systems and code implementation - 1	NEW / YENİ	Firm has Business Opening and Operating permit. However, office floor is not included to the permit. Firmada İşyeri Açma ve Çalıştırma Ruhsatı mevcuttur ancak ofis katı ruhsata dahil edilmemiştir.	 Training Systems Costs lack of workers Other – please give details: 	Firm shall ensure that all areas are included to Business Opening and Operating Permit. Firma tüm alanların İşyeri Açma ve Çalıştırma Ruhsatına dahil edildiğinden emin olmalıdır.	30 DAYS / 30 GÜN	DESKTOP / MASAÜSTÜ	ALİ ACAR / SALES MANAGER PAZARLAMA MÜDÜRÜ		
NC -2 2 Freedom of Association - 1	NEW / YENİ	There was assigned white-collar worker representative. There is no elected worker representatives in the firm. Atanmış beyaz yaka çalışan temsilcisi vardır.Firmada seçimle göreve gelmiş çalışan	 Training Systems Costs lack of workers Other – please give details: 	Firm shall ensure that there are elected worker representatives onsite. Firma çalışan temsilcilerinin seçimle göreve geldiğinden emin olmalıdır.	30 DAYS / 30 GÜN	DESKTOP / MASAÜSTÜ	ALİ ACAR / SALES MANAGER PAZARLAMA MÜDÜRÜ		





		temsilcisi mevcut değildir.						
NC – 3 3 Safety and Hygienic Conditions -1	NEW / YENİ	There is no certified first aiders in the firm. Firm has an application for trainings, however, training course declared that trainings are not available due to Covid- 19 pandemic. Firmada sertifikalı ilkyardımcı bulunmamaktadır. Firma eğitim için başvuruda bulunmuştur ancak kurs Covid-19 pandemisi nedeniyle eğitimlerin askıyıya alındığını bildirmiştir.	Training Systems Costs lack of workers Other – please give details:	Firm shall ensure that there are adequate number of certified first aiders on site. Firma yeterli sayıda sertifikalı ilkyardımcı bulundurmalıdır.	30 DAYS / 30 GÜN	DESKTOP / MASAÜSTÜ	ALİ ACAR / SALES MANAGER PAZARLAMA MÜDÜRÜ	
NC – 4 3 Safety and Hygienic Conditions -2	NEW / YENİ	Front of communicating door that reach emergency exit door in warehouse section was blocked. Emergency exit door in office was plastic and opened inwards Depo bölümünde acil çıkış kapısına ulaşılan ara kapının önü blokedir. Ofisteki acil çıkış kapısı platiktir ve dışarıya açılmıyordu.	 ☐ Training ⊠ Systems ☐ Costs ☐ lack of workers ☐ Other - please give details: 	Firm should ensure to be open front of all of the emergency exit doors . All of the emergency exit doors shoul be opened inwardsand make appropriate material. All of the emergency exit doors should be appropriate local law	30 DAYS / 30 GÜN	DESKTOP / MASAÜSTÜ	ALİ ACAR / SALES MANAGER PAZARLAMA MÜDÜRÜ	





				Firma tüm acil çıkış kapılarının önünün açık olmasını sağlamalıdır. Tüm acil çıkış kapıları dışarıya açılmalıdır ve uygun malzeme ile yapılmış olmalıdır . Tüm acil çıkış kapıları genel kanuna uygun olmalıdır.				
NC -5 5 Living Wages and Benefits-1	NEW / YENİ	According to management declaration, worker interviews and document reviews wage and time record of employees were kept as manual by management. Time records were showed as document that marked by management and there were not time of enter and exit in this document so regular working hours, overtime working hours, overtime working hours, salary payments, additional payments and possible deductions could not be verified from records. Yönetim beyanı çalışan görüşmesi ve döküman	☐ Training ⊠ Systems ☐ Costs ☐ lack of workers ☐ Other – please give details:	Firm should be recorded accordingly working hours and actual wages and benefits. Firma tüm çalışanların giriş çıkış saatlerini ve gerçekleşen tüm ödemeleri uygun şekilde kayıt altına almalıdır .	60 DAYS / 60 GÜN	FOLLOW UP AUDIT / TAKIP DENETIMI	ALİ ACAR / SALES MANAGER PAZARLAMA MÜDÜRÜ	





		kontrolüne göre çalışanların zaman ve ödeme kayıtları manuel olarak yönetim tarafından tutulmaktadır. Zaman kayıtları yönetimin işaretlediği döküman şeklinde gösterilmiştir ve düzenli çalışma saatleri ,aylık ödemeler ,ek ödemeler ve mümkün olan kesintiler kayıtlardan doğrulanamamıştır.						
NC -6 6 Working Hours-1	NEW / YENİ	According to management declaration, worker interviews and document reviews wage and time record of employees were kept by management. Time records were showed as document that marked by management and there were not time of enter and exit in this document so regular working hours, overtime working hours, overtime payments, additional payments, additional payments and possible deductions could not be verified from records. Yönetim beyani çalışan görüşmesi ve döküman kontrolüne göre çalışanların zaman ve ödeme kayıtları manuel olarak yönetim	☐ Training ⊠ Systems ☐ Costs ☐ lack of workers ☐ Other – please give details:	Firm should be recorded accordingly working hours and actual wages and benefits. Firma tüm çalışanların giriş çıkış saatlerini ve gerçekleşen tüm ödemeleri uygun şekilde kayıt altına almalıdır .	60 GUN/DAYS	FOLLOW UP AUDIT / TAKIP DENETIMI	ALİ ACAR / SALES MANAGER PAZARLAMA MÜDÜRÜ	





		tarafından tutulmaktadır. Zaman kayıtları yönetimin işaretlediği döküman şeklinde gösterilmiştir ve düzenli çalışma saatleri ,aylık ödemeler ,ek ödemeler ve mümkün olan kesintiler kayıtlardan doğrulanamamıştır.						
NC -7 8 Regular Employment -1	NEW / YENİ	The employment contract, article 1.10 states that "in holidays workers are obliged to do overtime work in advance. During the worker interviews, it was noted that overtime is voluntary. Çalışan Sözleşmeleri 1.10 maddesinde çalışan "bayram ve genel tatil günlerinde çalışma yapmayı peşinen Kabul eder" hükmü yer almaktadır Çalışan görüşmeleri sırasında fazla mesailerin gönüllülük esasına dayandığı not edilmiştir.	Training Systems Costs lack of workers Other – please give details:	The firm shall bear in mind that overtimes are voluntary. Firma, fazla mesailerin gönüllülük esasına dayalı olduğunu belirtmelidir.	30 DAYS / 30 GÜN	DESKTOP / MASAÜSTÜ	ALİ ACAR / SALES MANAGER PAZARLAMA MÜDÜRÜ	
NC -8 8 Regular Employment -2	NEW / YENİ	During the audit, 10 sampled employees' employment contracts were examined. It was noted that employment contracts have missing information in different areas.(working	 Training Systems Costs lack of workers Other – please give details: 	The firm shall ensure that all necessary areas are filled in the employment contracts. Firma iş sözleşmelerinde	30 DAYS / 30 GÜN	DESKTOP / MASAÜSTÜ	ALİ ACAR / SALES MANAGER PAZARLAMA MÜDÜRÜ	





		hours ,overtime hours etc.) Denetim sırasında 10 çalışanın iş sözleşmeleri incelenmiştir. İş sözleşmelerinde farklı alanlarda eksik bilgilerin olduğu not edilmiştir.(çalışma saatleri ,mesai saatleri vb)		gerekli tüm alanların doldurulmasını sağlamalıdır.				
NC -9 8A Subcontracting and Homeworking - 1	NEW / YENİ	Firm does not have policy and procedure regarding evaluation of sub-contractors. Firmada alt tedarikçileri değerlendirme amaçlı belirli bir politika ve prosedür mevcut değildir.	 ☐ Training ⊠ Systems ☐ Costs ☐ lack of workers ☐ Other – please give details: 	Firm shall ensure that sub- contractor evaluation procedure and forms are available. Firma alt tedarikçileri değerlendirme prosedürü ve formlarını oluşturmalıdır.	30 DAYS / 30 GÜN	DESKTOP / MASAÜSTÜ	ALİ ACAR / SALES MANAGER PAZARLAMA MÜDÜRÜ	
NC -10 10b2 Environment 2- Pillar -2	NEW / YENİ	There is no Environmental Exemption Letter in the firm. Firm has an application. Firmada Çevre Muafiyet Yazısı mevcut değildir. Firmanın başvurusu mevcuttur.	 ☐ Training ⊠ Systems ☐ Costs ☐ lack of workers ☐ Other – please give details: 	The firm shall ensure that Environmental Exemption Letter is available. Firma Çevre Muafiyet Yazısı edinmelidir.	30 DAYS / 30 GÜN	DESKTOP / MASAÜSTÜ	ALİ ACAR / SALES MANAGER PAZARLAMA MÜDÜRÜ	





	Corrective Action Plan – Observations										
Observation Number The reference number of the observation from the Audit Report, for example, Discrimination No.7	New or Carried Over Is this a new observation identified at the follow-up or one carried over (C) that is still outstanding	Details of Observation Details of Observation	Root cause (completed by the site)	Any improvement actions discussed (Not uploaded on to SEDEX)							
OBS-1 3 Safety and Hygienic Conditions	NEW / YENİ	Lock was available on all of the emergency exit doors, but doors were not locked. Tüm acil çıkış kapılarının üzerinde kilit vardır fakat kapılar kilitli değildir.	System /Sistem	Management declared to will remove from all of locks on emergency exit doors and making the doors with push bars. Yönetim tüm acil çıkış kapılarından kilitleri kaldıracağını ve kapıları push barlı hale getireceğini beyan etmiştir.							
OBS-2 3 Safety and Hygienic Conditions	NEW / YENİ	During tested fire alarm when the fire alarm started fire alarm could not be stoped by authorize . Fire alarm did not work as appropriate because of not being stoped .Employees don't have information about fire alarm system. Yangın alarmının denenmesi sırasında alarm çalışmaya başladığında yetkili tarafından durdurulamamıştır . Yangın alarmı durdurulamadığından dolayı uygun şekilde çalışmamaktadır .	System /Sistem	Management declaration to will be controlled fire alarm by authorized firm and give training about fire alarm employees. Yönetim yangın alarımın yetkili fşrmaya control ettileceğini ve çalışanlara yangın alarmı hakkında eğitim vereceğini belirtmiştir.							

Good examples			
Good example Number The reference number of the good example from the Audit Report, for example, Discrimination No.7	Details of good example noted	Any relevant Evidence and Comments	





GE1 5.Living Wages and Benefits 1-	It was noted that meal is provided free of charge to employees. İşletmede çalışanlara ücretsiz yemek servisi sağlanmaktadır.	Worker interviews, management declaration, document review Çalışan görüşmeleri, yönetim beyanı, döküman inceleme
GE2 5.Living Wages and Benefits 2-	Çalışanlara Ramazan döneminde erzak yardımı yapılmaktadır. Workers were given food aid in Ramadan season.	Worker interviews, management declaration, document review

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Confirmation

Please sign this document confirming that the above findings have been discussed with and understood by you: (site management) If actual signatures are not possible in electronic versions, please state the name of the signatory in applicable boxes, as indicating the signature.					
A: Site Representative Signature:	ALİ ACAR	Title SALES MANAGER /PAZARLAMA MÜDÜRÜ			
		Date : 15/12/2021			
B: Auditor Signature:	SERKAN AK	Title : LEAD AUDITOR			
		Date :15/12/2021			
C: Please indicate below if you, the site management, dispute any of the findings. No need to complete D-E, if no disputes.					
D: I dispute the following numbered non-compliances:-					
E: Signed:		Title -			
(If <u>any</u> entry in box D, please complete a signature on this line)		Date -			
F: Any other site Comments: NONE					





Guidance on Root Cause

Explanation of the Root Cause Column

If a non-compliance is to be rectified by a corrective action which will also prevent the noncompliance re-occurring, it is necessary to consider whether a system change is required.

Understanding the root cause of the non-compliance is essential if a site is to prevent the issue reoccurring.

The root cause refers to the specific activity/ procedure or lack of activity /procedure which caused the non-compliance to arise. Before a corrective action can rectify the situation, it is important to find out the real cause of the non-compliance and whether a system change is necessary to ensure the issue will not arise again in the future.

Since this is a new addition, it is not a mandatory requirement to complete this column at this time. We hope to encourage auditors and sites to think about Root Causes and where they are able to agree, this column may be used to describe their discussion.

Some examples of finding a "root cause"

Example 1

Where excessive hours have been noted the real reason for these needs to be understood, whether due to production planning, bottle necks in the operation, insufficient training of operators, delays in receiving trims, etc.

Example 2

A non-compliance may be found where workers are not using PPE that has been provided to them. This could be the result of insufficient training for workers to understand the need for its use; a lack of follow-up by supervisors aligned to a proper set of factory rules or the fact that workers feel their productivity (and thus potential earnings) is affected by use of items such as metal gloves.

Example 3

A site uses fines to control unacceptable behaviour of workers.

International standards (and often local laws) may require that workers should not be fined for disciplinary reasons.

It may be difficult to stop fines immediately as the site rules may have been in place for some time, but to prevent the non-compliance re- occurring it will be necessary to make a system change.

The symptom is fines, but the root cause is a management system which may break the law. To prevent the problem re-occurring it will be necessary to make a system change for example the site could consider a system which rewards for good behaviour

Only by understanding the underlying cause can effective corrective actions be taken to ensure continuous compliance.

The site is encouraged to complete this section so as to indicate their understanding of the issues raised and the actions to be taken.





For more information visit: <u>Sedexglobal.com</u>

Your feedback on your experience of the SMETA audit you have observed is extremely valuable. It will help to make improvements to future versions.

You can leave feedback by following the appropriate link to our questionnaire:

Click here for Buyer (A) & Buyer/Supplier (A/B) members: http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d

Click here for Supplier (B) members: http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d

> Click here for Auditors: https://www.surveymonkey.co.uk/r/BRTVCKP