




SMETA Corrective Action Plan Report (CAPR)

Version 6.0



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: N/A Non-member	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: N/A Non-member
Business name (Company name):	ILTEKS TEKSTIL TIC. VE SAN. A.S.		
Site name:	ILTEKS TEKSTIL TIC. VE SAN. A.S.		
Site address: <i>(Please include full address)</i>	Namik Kemal Mah. 176. Sokak No:3 Esenyurt / Istanbul	Country:	TURKEY
Site contact and job title:	ISAK KARAKO / ACCOUNT MANAGER		
Site phone:	00902126904455	Site e-mail:	info@ilteks.com.tr
SMETA Audit Type:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety	<input checked="" type="checkbox"/> Environment <input checked="" type="checkbox"/> Business Ethics
Date of Audit:	05-06.09.2018/19.12.2018 / 19.04.2019		

<p>Audit Company Name & Logo:</p> <p>Bureau Veritas CPS</p> 	<p>Report Owner (payee): <i>(If paid for by the customer of the site please remove for Sedex upload)</i></p> <p>ILTEKS TEKSTIL TIC. VE SAN. A.S.</p>
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Audit Conducted By					
Commercial	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	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 6.0 April 2017 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):

Auditor Team (s) (please list all including all interviewers):

Lead auditor: Azize Hacibekiroglu/ Aygül Karadeniz / AZIZE HACIBEKIROGLU

Team auditor: DOĞUKAN ALKAN

Interviewers: Azize Hacibekiroglu/ Buğra Karaca / AZIZE HACIBEKIROGLU

Report writer: Azize Hacibekiroglu/ Buğra Karaca / DOĞUKAN ALKAN

Report reviewer: Nina Chen

Date of declaration: 05-06.09.2018/ 19.12.2018 / 19.04.2019

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 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.

Audit Parameters

Audit Parameters			
A: Time in and time out	Day 1 Time in: 9:00/09:30/ 09:00 Day 1 Time out:16:00/17:00/ 16:00	Day 2 Time in: 09:00 / / - Day 2 Time out:16:00	Day 3 Time in: Day 3 Time out:
B: Number of Auditor Days Used:	2 man/day (1 auditor x 2 days)/2 man/day(2 auditor x 1 days) / 2 manday(2 auditor x 1 day)		
C: Audit type:	<input checked="" type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input checked="" type="checkbox"/> Full Follow-up <input checked="" type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other – Define		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 15.04.2019 - 28.04.2019 <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If No, why not : It was not requested by facility.		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	ISAK KARAKO / ACCOUNT MANAGER		
H: Is further information available (if Y please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	Nil/ N/A/19.12.2018		
J: Previous audit type:	Nil/ N/A/ Full Follow-up		
K: Was any previous audit reviewed during this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		

Audit attendance	Management		Worker Representatives	
	Senior management		Worker Committee representatives	Union representatives
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	Nil/ There were 3 worker representative onsite. 3 worker representatives were included into the worker interview process.		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	No union at facility/ No union at facility		

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)

Note: it is not mandatory to complete this column at this time.

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 www.sedexglobal.com.
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 www.sedexglobal.com 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 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 – non-compliances									
Non-Compliance Number <i>The reference number of the non-compliance from the Audit Report, for example, Discrimination No.7</i>	New or Carried Over <i>Is this a new non-compliance identified at the follow-up or one carried over (C) that is still outstanding</i>	Details of Non-Compliance <i>Details of Non-Compliance</i>	Root cause <i>(completed by the site)</i>	Preventative and Corrective Actions <i>Details of actions to be taken to clear non-compliance, and the system change to prevent re-occurrence (agreed between site and auditor)</i>	Timescale <i>(Immediate, 30, 60, 90, 180, 365)</i>	Verification Method <i>Desktop / Follow-Up [D/F]</i>	Agreed by Management and Name of Responsible Person: <i>Note if management agree to the non-compliance, and document name of responsible person</i>	Verification Evidence and Comments <i>Details on corrective action evidence</i>	Status <i>Open/Closed or comment</i>
0B:Management system and Code Implementation-1	New OLD	It was noted that factory did not post ETI Base Code in common area of facility.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	It is recommended that management adopt practices and controls to ensure that Code is communicated to all workers and a responsible person is assigned for compliance of the code.	30 days	Desktop	ISAK KARAKO / ACCOUNT MANAGER	The company was posted ETI Base Code in common area of facility.	Closed
0B:Management system and Code Implementation-2	New OLD	It was noted that there were inconsistencies between submitted time records and submitted pay stub records. Therefore; regular working hours, overtime working hours, deserved payments and social insurance premium payments of the workers could not be verified from records.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	It is recommended that suitable records should be kept.	60 Days	Follow up	ISAK KARAKO / ACCOUNT MANAGER	Time attendance records was available correctly. So; Payments records was verified.	Closed

3: Working Conditions are Safe and Hygienic -1	New OLD	It was noted that no evacuation plan was posted in production area.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	It is recommended that management adopt practices and controls to ensure that evacuation plans are posted in all areas.	60 Days	Desktop	ISAK KARAKO / ACCOUNT MANAGER	Evacuation plan was posted in production area.	Closed
3: Working Conditions are Safe and Hygienic -2	New OLD	It was noted that there were no MSDS (Material Safety Data Sheet) available in chemical area.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	It is recommended that management adopt practices and controls to ensure that all chemicals being used in the factory have complete MSDS (Material Safety Data Sheets) which are also provided to the relevant employees handling chemicals in the factory.	60 days	Desktop	ISAK KARAKO / ACCOUNT MANAGER	MSDS (Material Safety Data Sheet) available in chemical area.	Closed
3: Working Conditions are Safe and Hygienic -3	New OLD	It was noted that security guard was broken on 1 out of 20 knitting machines.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	It is recommended that management adopt practices and controls to ensure that protective guards are installed on all machines	30 days	Desktop	ISAK KARAKO / ACCOUNT MANAGER	The company has protectors for all knitting machines.	Closed
3: Working Conditions are Safe and Hygienic -4	New OLD	It was noted that emergency exit doors in locker room were opening inwards in facility.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	It is recommended that management adopt practices and controls to ensure that all exit doors are opening outwards.	60 days	Desktop	ISAK KARAKO / ACCOUNT MANAGER	Emergency exit doors in locker room were opening outwards in facility.	Closed

3: Working Conditions are Safe and Hygienic -5	New CARRIED OVER/OLD	It was noted that factory management failed to provide the auditors with the safety inspection reports for 2 out of 2 elevators.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	It is recommended that management adopt practices and controls to ensure that a safety inspection for the (boilers/ compressor/ elevator) being used in the factory is conducted and the safety inspection certificate is obtained.	60 days	Desktop	ISAK KARAKO / ACCOUNT MANAGER	2nd follow-up audit on 19.04.2019, closed: It was noted that inspection reports were available for 2 out of 2 elevators. Previous finding: It was noted that factory management failed to provide the auditors with the safety inspection reports for 2 out of 2 elevators. However the facility have done application for these.	Open / Closed
3: Working Conditions are Safe and Hygienic -6	New OLD	It was noted that facility has not fire safety inspection reports.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	It is recommended that management adopt practices and controls to ensure that a safety inspection for the fire system being used in the factory is conducted and the safety inspection certificate is obtained.	30 Days	Desktop	ISAK KARAKO / ACCOUNT MANAGER	The company has fire safety inspection reports.	Closed
3: Working Conditions are Safe and Hygienic -7	New OLD	It was noted that there was not hygiene training for staff distributing food.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	It is recommended that management ensure the hygiene certificate for staff disturbing food.	30 Days	Desktop	ISAK KARAKO / ACCOUNT MANAGER	The company has hygiene training for staff distributing food.	Closed
Safety and Hygienic Conditions-1	New/ CARRIED OVER	It was noted that factory did not have a documented for ventilation system and	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers	It is recommended that management adopt practices and controls to ensure that	30 days	Desktop	ISAK KARAKO / ACCOUNT MANAGER	2nd follow-up audit on 19.04.2019, opened: It was noted that factory still have not an	Open

		did not keep relevant records on-site.	<input type="checkbox"/> Other – please give details:	machine maintenance program is documented and records are kept properly.				inspection report for ventilation system.	
Safety and Hygienic Conditions-2	New	It was noted that; 2 fire hose were blocked.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	It is recommended that management adopt practices and controls to ensure that fire extinguishers must be available	60days	Desktop	ISAK KARAKO / ACCOUNT MANAGER	2nd follow-up audit on 19.04.2019, closed: It was noted that fire hoses were clear during the site tour.	Closed
Safety and Hygienic Conditions-3	New	Workplace environment of existing young employees, pregnant employees and disabled employees were not taken into account in the risk assessment.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details	It is recommended that juvenile employees, pregnant employees and disabled employees should be added to the risk assessment.	30 days	Desktop	ISAK KARAKO / ACCOUNT MANAGER	2nd follow-up audit on 19.04.2019, closed: It was noted that young, pregnant and disabled employees' risks in production area were assessed in risk assessment.	Closed
Safety and Hygienic Conditions-4	New	It was noted that; Non-conformities were observed in the latest lighting measurements report.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	It is recommended that management adopt practices and controls to ensure that All section lighting measurements value should be appropriate legal limits.	30 days	Follow-Up	ISAK KARAKO / ACCOUNT MANAGER	2nd follow-up audit on 19.04.2019, closed: It was noted that lighting measurement was compliance.	Closed
Safety and Hygienic Conditions-5	New	It was noted that; 2 Emergency exit door was locked.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers	It is recommended that management adopt practices and controls to ensure that all	Immediate	Follow Up	ISAK KARAKO / ACCOUNT MANAGER	2nd follow-up audit on 19.04.2019, closed: emergency exit doors were clear during the site tour.	Closed

			<input type="checkbox"/> Other – please give details:	<p>emergency exit door should be open always.</p>					
5: Living Wages are Paid -1	New OLD	<p>It was noted that there were inconsistencies between submitted time records and submitted pay stub records. Therefore; regular working hours, overtime working hours, deserved payments and social insurance premium payments of the workers could not be verified from records. Details: the time recorder system presented is very complex. Entry and exit times were not understandable for weekdays. On the weekends working, there was the entry time but there was no exit time.</p>	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	<p>It is recommended that suitable records should be kept.</p>	60 Days	Follow up	ISAK KARAKO / ACCOUNT MANAGER	<p>Time attendance records was available correctly. So; Payments records was verified.</p>	Closed
Leave / Holiday Entitlement	New	<p>It was noted that; The company did not have an annual leave record.</p>	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	<p>It is recommended that management adopt practices and controls to ensure that annual leave records should be kept by the company for all workers.</p>	60 Days	Follow Up	ISAK KARAKO / ACCOUNT MANAGER	<p>2nd follow-up audit on 19.04.2019, closed: It was noted that the company have kept employees' annual leave records.</p>	Closed
6: Working Hours are not Excessive-1	New	<p>It was noted that there were inconsistencies between submitted time records and submitted</p>	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers	<p>It is recommended that suitable records should be kept.</p>	60 Days	Follow up	ISAK KARAKO / ACCOUNT MANAGER	<p>Time attendance records was available correctly.</p>	Closed

		pay stub records. Therefore; regular working hours, overtime working hours, deserved payments and social insurance premium payments of the workers could not be verified from records.	<input type="checkbox"/> Other – please give details:						
No Harsh or Inhumane Treatment is Allowed	New	It was noted that the factory documented and communicated to all employees a progressive disciplinary policy including wage deductions (e.g. escalating disciplinary action steps such as warning, wage deductions and termination). One employee has 2 business days deduction.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	It is recommended that management adopt practices and controls to ensure that a disciplinary policy and procedure is established without wage deductions	60 days	Follow Up/ Takip Denetimi	ISAK KARAKO / ACCOUNT MANAGER	2nd follow-up audit on 19.04.2019, closed: It was noted that disciplinary rules were revised with not including money fines and new rules were communicated to all employees.	Closed
10. Other issue areas 10B4: Environment 4- Pillar -2	New CARRIED OVER/ CARRIED OVER	It was noted that factory did not have Environmental Permit and environmental impact assessment (EIA). However the facility have done application for these.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	It is recommended that management adopt practices and controls to ensure that environmental permit is obtained.	30 days	Desktop	ISAK KARAKO / ACCOUNT MANAGER	2nd follow-up audit on 19.04.2019, opened: It was noted that factory did not have Environmental Permit. Previous finding: It was noted that factory did not have Environmental Permit. However the facility have done application for these.	Open/Open
10. Other issue areas 10B4: Environment 4- Pillar -1	New OLD	It was note that the facility has not environmental policy and any responsible	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers	It is recommended that management create environmental	30 Days	Desktop	ISAK KARAKO / ACCOUNT MANAGER	The Company has environmental policy and any responsible	Closed

		person about environmental issues.	<input type="checkbox"/> Other – please give details:	policy and adopt this issues.				person about environmental issues.	
10. Other issue areas 10B4: Environment 4–Pillar -3	New CARRIED OVER/ CARRIED OVER	It was note that facility have not measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	It is recommended that management adopt impacts relative issues.	30 Days	Desktop	ISAK KARAKO / ACCOUNT MANAGER	It was note that facility have not measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources. 2nd follow-up audit on 19.04.2019, opened: It was note that facility have not measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources.	Open/Open
10C: Business Ethics – 4-Pillar Audit -1	New OLD	It was note that the facility has not ethics policy and any responsible person about ethic issues.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	It is recommended that management create ethic policy and adopt this issues.	30 Days	Desktop	ISAK KARAKO / ACCOUNT MANAGER	The facility has ethics policy and A responsible person about ethic issues.	Closed

Corrective Action Plan – Observations

Observation Number <i>The reference number of the observation from the Audit Report, for example, Discrimination No.7</i>	New or Carried Over <i>Is this a new observation identified at the follow-up or one carried over (C) that is still outstanding</i>	Details of Observation <i>Details of Observation</i>	Root cause <i>(completed by the site)</i>	Any improvement actions discussed <i>(Not uploaded on to SEDEX)</i>

Observation 0.A.1	new	It was noted that facility have not a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers. 2 nd Partial Follow Up audit on 19 April 2019 APPROPRIATE ACTION NOT TAKEN Follow up Status: Open (same as previous 1 st Follow up audit)		
Observation 0.A.2	new	It was noted that facility have not designated person responsible for implementing standards concerning Human rights. 2 nd Partial Follow Up audit on 19 April 2019 APPROPRIATE ACTION NOT TAKEN Follow up Status: Open (same as previous 1 st Follow up audit)		
Observation 0.A.3	new	It was noted that facility have not identify their stakeholders and salient issues 2 nd Partial Follow Up audit on 19 April 2019 APPROPRIATE ACTION NOT TAKEN Follow up Status: Open (same as previous 1 st Follow up audit)		
Observation 0.A.4	new	It was noted that facility have not measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights. 2 nd Partial Follow Up audit on 19 April 2019 APPROPRIATE ACTION NOT TAKEN Follow up Status: Open (same as previous 1 st Follow up audit)		
Observation 0.A.5	new	It was noted that facility have not adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation. 2 nd Partial Follow Up audit on 19 April 2019 APPROPRIATE ACTION NOT TAKEN Follow up Status: Open (same as previous 1 st Follow up audit)		
Observation 0.A.6	new	It was noted that facility have not a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter 2 nd Partial Follow Up audit on 19 April 2019 APPROPRIATE ACTION NOT TAKEN Follow up Status: Open (same as previous 1 st Follow up audit)		
10. Other issue areas	New	It was noted that factory did not complete SAQ (self-assessment questioner) form. 2 nd Partial Follow Up audit on 19 April 2019 APPROPRIATE ACTION NOT TAKEN Follow up Status: Open (same as previous 1 st Follow up audit)		

Good examples

Good example Number <i>The reference number of the non-compliance from the Audit Report, for example, Discrimination No.7</i>	Details of good example noted	Any relevant Evidence and Comments
	None observed	

Confirmation

<p>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.</p>		
A: Site Representative Signature:	ISAK KARAKO	Title: ACCOUNT MANAGER Date :19.04.2019
B: Auditor Signature:	AZIZE HACIBEKIROGLU / DOĞUKAN ALKAN	Title: AUDITOR / AUDITOR Date :19.04.2019
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: (If <u>any</u> entry in box D, please complete a signature on this line)		Title Date
F: Any other site Comments:		

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 non-compliance 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 re-occurring.

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: Sedexglobal.com

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:](#)

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