

Fair Labor Association: Independent External Factory Assessment

Assessment Date :

09 Aug 2021



Factory Information

FLA Affiliates	adidas
Country	Turkey
Number of Workers	422

Understanding this Report

Companies that join the FLA agree to uphold the FLA Workplace Code of Conduct throughout their entire supply chain. The Code of Conduct is based on International Labour Organization (ILO) standards, and defines labor standards that aim to achieve decent and humane working conditions.

FLA Code Element

Number of Violations

Employment Relationship (ER)	4
Health, Safety And Environment (HSE)	14
Hours Of Work (HOW)	4
Nondiscrimination (ND)	1

Assessment Information

Assessor	Sinan Doven
Assessment Date	09 Aug 2021
Assessment Purpose	Factory Assessment (Virtual Compliance Check)

ASSESSMENT RESULTS

Employment Relationship (ER)

Benchmark ID	ER.8
Benchmark Details	Employers shall have written policies and procedures with regard to promotion, demotion, and job reassignment that outline the criteria, demonstrate linkages to job grading, and prohibit discrimination or use of demotion or job reassignment as a form of penalty or punishment, are provided in writing and seek feedback from employees in writing, and follow all local legal requirements.
Finding Details	The factory has a performance evaluation system, however, this evaluation only affects the annual raise. It does not demonstrate linkages to job grading or promotions.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER.4
Benchmark Details	Employers shall inform workers about workplace rules, environmental protection systems, health and safety information, and laws regarding workers' rights with respect to freedom of association, compensation, working hours, and any other legally required information, and the FLA Code through appropriate means, including posted in local language(s) throughout the workplace's common areas.
Finding Details	The FLA Code is neither posted nor communicated to the workers.

Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER.19.1
Benchmark Details	Employers shall maintain on file all documentation needed to demonstrate compliance with the FLA Workplace Code and required laws.
Finding Details	Contract Clause 10 indicates that the worker agrees to change job or location in advance. Clause 14 indicates that the worker cannot work at similar jobs after employment and the employer would request a fee as a penalty which the amount section is left blank.
Recommendation for Immediate Action	
Compliance Classifications	
Local Law	
Benchmark ID	ER.3.3
Benchmark Details	Workers should be provided with written documentation that substantiates all the issues covered in orientation briefings.
Finding Details	The factory does not provide written documentation that substantiates all the issues covered in orientation briefings.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required

Local Law	
Health, Safety And Environment (HSE)	
Benchmark ID	HSE.6.2
Benchmark Details	A sufficient number of workers shall be trained in first aid and firefighting techniques. Training shall be upon hire and with periodic refresher training.
Finding Details	The health and safety training documents were not completed or ready for review, The documents did not include the workplace doctor's signature verifying that he provided the occupational disease training.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	Health & Safety Training Regulation, 15.05.2013, No: 28648, Art 13
Benchmark ID	HSE.5.3
Benchmark Details	Alarm systems shall be regularly tested and evacuation drills shall be undertaken at least annually.
Finding Details	There are a total of 581 workers, trainees, and interns (including workers in the printing branch) in the factory. The evacuation drills on August 7, 2021 only included 459 workers. This drill took place in the daytime.
Recommendation for Immediate Action	Conduct annual evacuation drills for all workers and at all shifts.
Compliance Classifications	Immediate Action Required

Local Law	Regulation Regarding the Emergency Cases at Workplaces (June 18, 2013), No: 28681, Art. 13
Benchmark ID	HSE.5.1
Benchmark Details	All applicable, legally required or recommended elements of safe evacuation shall be complied with, including all of the following elements: posting evacuation plans; the installation and maintenance of fire alarms; the installation and maintenance of emergency lighting; ensuring aisles/exits are not blocked and that workers are not blocked within their workstations; employee education and training; and evacuation procedures and fire drills.
Finding Details	1. The aisles at the cutting and sewing sections were blocked temporarily. 2. The changing room's main door at the printing branch does not have an emergency exit sign. 3. The factory has not remarked evacuation routes since recent layout changes at the box warehouse and cutting sections. 4. The evacuation plot plans do not show the actual layout of the factory because of the recent layout changes.
Recommendation for Immediate Action	1. Keep all aisles unblocked at all times. 2. Install all necessary emergency signs. 3. Remark the evacuation route based on recent factory layout changes. 4. Revise the evacuation plot plan based on recent factory layout changes.
Compliance Classifications	Immediate Action Required
Local Law	Regulation Regarding the Prevention of Fire in the Buildings, (November 27, 2007), No: 26735, Article 33; Regulation Regarding the Prevention of Fire in the Buildings, (November 27, 2007), No: 26735, Article 71; Regulation Regarding the Emergency Cases at Workplaces, (June 18, 2013), No: 28681, Article 10
Benchmark ID	HSE.5.1.3
Benchmark Details	All applicable, legally required or recommended elements of safe evacuation shall be complied with, including all the following elements: installation and maintenance of emergency lighting

Finding Details	The printing section changing rooms do not have emergency exit lighting. Additionally, the emergency lighting was not working at the two exit doors of the training section where the sewing trainees work.
Recommendation for Immediate Action	Install and maintain emergency exit lighting in all working areas.
Compliance Classifications	Immediate Action Required
Local Law	Regulation Regarding the Prevention of Fire in the Buildings, (November 27, 2007), No: 26735, Article 71
Benchmark ID	HSE.5.1.2
Benchmark Details	All applicable, legally required or recommended elements of safe evacuation shall be complied with, including all the following elements: installation and maintenance of fire alarms;
Finding Details	During the factory tour, the fire alarm panel in the first building was giving an error message.
Recommendation for Immediate Action	Fix the error in the fire alarm panel and check it regularly. The fire system panel should be operating without any error during work hours.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	HSE.5.1.4
Benchmark Details	All applicable, legally required or recommended elements of safe evacuation shall be complied with, including all the following: ensuring aisles/exits are not blocked and that workers are not blocked within their workstations
Finding Details	The emergency exit door of the cutting section was temporarily blocked.

Recommendation for Immediate Action	Remove all obstructions from emergency exit doors and keep them unblocked at all times.
Compliance Classifications	Immediate Action Required
Local Law	Regulation Regarding the Prevention of Fire in the Buidings, (November 27, 2007), No: 26735, Article 33
Benchmark ID	HSE.9.1
Benchmark Details	All chemicals and hazardous substances shall be properly labeled and stored in secure and ventilated areas and disposed of in a safe and legal manner, in accordance with applicable laws and international standards.
Finding Details	The factory does not have secondary containment for some chemicals for cleaning and oils in the maintenance room, oven room, and hazardous waste storage.
Recommendation for Immediate Action	Provide secondary containment for all stored chemicals in the factory, including in the maintenance room, oven room, and hazardous waste storage.
Compliance Classifications	Immediate Action Required
Local Law	Regulation Rearding Health & Safety Precautions in Work with Chemical Substances (August 12, 2013), No. 28733, Article 7.f
Benchmark ID	HSE.19
Benchmark Details	All facilities including workplace buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with all applicable laws, including relevant sanitation, medical, and safety and health regulations.
Finding Details	The factory does not keep food samples for 72 hours, as required by local law.
Recommendation for Immediate Action	Keep food samples for at least 72 hours.

Compliance Classifications	Immediate Action Required
Local Law	Food safety and quality inspection and control regulation, 26.9.2008, No: 27009, Art 8-1
Benchmark ID	HSE.13
Benchmark Details	All necessary ventilation, plumbing, electrical, noise and lighting services shall be installed and maintained to conform to applicable laws and to prevent or minimize hazardous conditions to workers in the facility.
Finding Details	1. The factory conducted an illumination assessment on 10.10.2019 during the daytime. The assessment did not cover the embroidery section at all. The assessment covered the printing section, however, there is no report that saying the printing section is illuminated properly. 2. One compressor located in a separate room away from the work floors has a finding that needs to be corrected before using it.
Recommendation for Immediate Action	1. Conduct a lighting assessment in the missing sections and at night time. 2. Fix the issue with the compressor and document that the compressor is safe to use.
Compliance Classifications	Immediate Action Required
Local Law	Regulation Regarding the Health and Safety Precautions at the Buildings and the Built on Connections (July 17, 2013), No: 28710 - Appendix 1: Minimum Health and Safety Requirements in the Buildings and Built on Connections, Article 22; Regulation regarding health and safety conditions of the work equipment (April 25, 2013), No: 28628 - Appendix 3: 1.9
Benchmark ID	HSE.6.1
Benchmark Details	All safety and medical equipment (e.g. fire fighting equipment, first aid kits) shall be available in sufficient numbers throughout the workplace, maintained and stocked as prescribed, and easily accessible to workers.

Finding Details	1. Six fire extinguishers in male and female changing rooms, cutting, box warehouse, ironing section are not marked. 2. The maintenance room does not have an eyewash station. The MSDS MSDS for the oils and chemicals used in this room indicate that the eyes shall be washed for at least 15 minutes with running water.
Recommendation for Immediate Action	1. Mark all fire extinguishers in the factory. 2. Provide eyewash stations in the maintenance room in accordance with the MSDS of chemicals used.
Compliance Classifications	Immediate Action Required
Local Law	Health and Safety Signs Regulation (2003), Art. 2.1.1 ; Regulation Regarding Health & Safety Precautions in Work with Chemical Substances (August 12, 2013), No. 28733, Article 7.f
Benchmark ID	HSE.4.1
Benchmark Details	Employers shall at all times be in possession of all legally required and valid permits and certificates related to health, safety, and environmental issues, such as: Purchase and storage of chemicals; Fire safety inspections; Machinery inspections; Waste disposal; Environmental licenses/permits; Sanitation permits, including those required for canteens; and Vehicle inspection and driver permits for all employer provided transportation.
Finding Details	The factory only has 21 workers with a first aid certification for 581 total workers. Based on local law, the factory needs to have one person with a first aid certification for every 20 workers. The factory needs to have 29 people with the first aid certification.
Recommendation for Immediate Action	Ensure that at least 29 workers have a first aid certification and keep the number of the first aiders in accordance with legal requirements - one first aid certified worker for every 20 workers.
Compliance Classifications	Immediate Action Required
Local Law	First Aid Regulation (2002), No.24762, Art.16
Benchmark ID	HSE.1

Benchmark Details	Employers shall comply with all national laws, regulations and procedures concerning health, safety, and the environment.
Finding Details	1. The explosion prevention document does not include the charging area. 2. The factory has a branch building with a different registration number on the same premises. The factory does the printing process for another brand in this building. According to management, they are still developing preparations for health and safety precautions. The factory has not developed working permissions and has not conducted the internal workplace assessments (air quality, dust, noise, thermal, etc.). The factory also does not have fire safety requirements, including the fire alarm system, fire detectors, visual flashers connected to fire alarms, and evacuation plans. There is no suggestion box at the printing branch's changing rooms. Additionally, the male changing room does not have a secondary exit even though the room has 40 lockers. 3. Masks for Covid 19 were not used properly and there were several crowded sections that do not follow social distancing.
Recommendation for Immediate Action	1. Include the charging area in the Explosion Prevention Document. 2. Obtain working permission and registration for the printing branch located at a separate building within the same premises. Conduct internal workplace assessments such as air quality, dust, noise, thermal comfort and take all precautions accordingly. Ensure that all fire safety requirements are included in risk assessment in the printing section. Provide a secondary exit in the male changing room, centralized fire alarm systems, fire detectors, visual flashers connected to fire alarm, and evacuation plans. 3. Provide training to the workers on how to use masks and ensure social distancing in the workplace.
Compliance Classifications	Immediate Action Required
Local Law	Working Permission Regulation (2005), Art. 6; Explosion Prevention Regulation, 30.04.2013, No: 28633, Art 5
Benchmark ID	HSE.30.2.6

Benchmark Details	The health, safety, and environmental policies shall contain the framework for a comprehensive health, safety, and environmental management system including a HS&E risk assessment within which the following are clear and regularly tested and reviewed:protections to workers who allege health, safety, and environmental violations;
Finding Details	The risk assessment does not indicate that elderly worker need special protection.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	Risk assessment regulation, 29.12.2012, No: 28512, Art 8.1
Benchmark ID	HSE.11
Benchmark Details	To prevent unsafe exposure to hazardous chemicals and hazardous substances, appropriate accommodations shall be made for pregnant women and workers under the age of 18, as required by applicable laws or the provisions of the FLA Workplace Code, in a manner that does not unreasonably disadvantage workers.
Finding Details	The factory does not assign "buddies" to workers who need special protections, including disabled or pregnant workers, to help them get to safe areas in case of emergency.
Recommendation for Immediate Action	Assign buddies for workers who need special protection in accordance with law.
Compliance Classifications	Immediate Action Required
Local Law	Emergency case regulation, 18.06.2013, No: 28681, Art 10
Hours Of Work (HOW)	

Benchmark ID	HOW.8.2
Benchmark Details	All overtime work shall be consensual, and employers shall enact a voluntary overtime system, including for overtime utilized in exceptional circumstances*.
Finding Details	Although the factory has clear policies and procedures as all overtime work is voluntary, workers expressed during the worker interviews that they feel pressure to accept overtime work when the production demands are high as they have to present a valid reason not to work overtime.
Recommendation for Immediate Action	Overtime work should be voluntary at all times. Provide sufficient communication to all workers on voluntary overtime.
Compliance Classifications	Immediate Action Required
Local Law	Labor Law, 2003, 4857, Article 41
Benchmark ID	HOW.1.1
Benchmark Details	Employers shall comply with all national laws, regulations and procedures concerning hours of work, public holidays and leave.
Finding Details	Based on time records provided, nine workers worked 12 hours per day at least once in February 2021.
Recommendation for Immediate Action	Ensure that workers do not work more than 11 hours per day.
Compliance Classifications	Immediate Action Required
Local Law	Turkish Labor Law, 2003, No: 4857, Art 63
Benchmark ID	HOW.22.1
Benchmark Details	Employers shall have in place policies for managing all working hour, overtime, and leave records in normal and exceptional circumstances.

Finding Details	Working hours and overtime policy indicate the wrong labor law numbers. For example, regular working hours are referenced as labor law article 61 but regular working hours are actually at part of labor law article 63.
Recommendation for Immediate Action	Working hours and overtime policy should be revised to align with correct labor law articles.
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	HOW.9.2
Benchmark Details	Employers shall take reasonable steps to inform workers about the nature and expected duration of the circumstances sufficiently in advance to allow workers to make alternative plans.
Finding Details	The factory tells workers if there will be overtime work on the same day around 10-11AM. This practice makes it difficult for workers' work-life balance, especially in peak seasons when overtime work is more frequent.
Recommendation for Immediate Action	Ensure that the production plan is maintained and provide overtime work information further in advance.
Compliance Classifications	Immediate Action Required
Local Law	
Nondiscrimination (ND)	
Benchmark ID	ND.9

Benchmark Details	Employers shall not, on the basis of a person's health status, make any employment decisions that negatively affect the person's employment status, including decisions concerning recruitment, termination, promotion, or assignment of work, unless such decision is dictated by the inherent requirements of the job or a medical necessity to protect the worker and/or other workers.
Finding Details	'Company Policy' indicates that workers below 18 cannot work in the factory which leads to discrimination against young workers. The factory also has policies and procedures on young worker management, however, it does not allow hiring below 18 years old workers. Prohibiting the hiring of workers under 18 can lead to discrimination.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	

