

Fair Labor Association: Independent External Factory Assessment

Assessment Date :

05 Jun 2023



Factory Information

FLA Affiliates	47 Brand, LLC
Country	Turkey
Number of Workers	210

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

FLA Code Element	Number of Violations
Compensation (C)	3
Employment Relationship (ER)	9
Health, Safety And Environment (HSE)	11
Hours Of Work (HOW)	4
Nondiscrimination (ND)	1

Assessment Information

Assessor	Sinan Doven
Assessment Date	05 Jun 2023

Assessment Purpose

Factory Assessment (In-Person)

ASSESSMENT RESULTS

Compensation (C)

Benchmark ID	C.1.1
Benchmark Details	Employers shall comply with all national laws, regulations and procedures concerning the payment of compensation to workers.
Finding Details	Part of wages and overtime is paid on cash basis at subcontractor company due to keeping two sets of payroll practice.
Recommendation for Immediate Action	All the wages should be paid through bank deposit and actual compensation should be listed on social security payroll.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	C.17
Benchmark Details	Employers shall ensure that all legally required payroll documents, journals and reports are available, complete, accurate and up-to date.
Finding Details	Actual wages and overtime compensation are not listed on social security payroll at subcontractor.
Recommendation for Immediate Action	Actual wages and overtime compensation should be listed on social security payroll at subcontractor.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	C.15.1

Benchmark Details	Employers shall provide workers a pay statement in languages understood by workers each pay period and not less frequently than once a month,
Finding Details	Actual pay slips are not provided to subcontractor workers due to keeping two sets of payroll practice.
Recommendation for Immediate Action	Actual pay slips should be provided to the workers.
Compliance Classifications	Immediate Action Required
Local Law	

Employment Relationship (ER)

Benchmark ID	ER.11.2
Benchmark Details	Employers must ensure the following minimum terms and conditions are met in the employment of contract/contingent/migrant/temporary workers: Contract/contingent/migrant/temporary workers shall be provided an employment agreement in their native language setting out the employment terms and conditions. for migrant workers, a copy of their employment contract in their native language shall be provided prior to departure from their country of origin;
Finding Details	Nearly 50% of subcontractor workers interviewed reported that the copies of contracts are not provided.
Recommendation for Immediate Action	Copies of contracts should be provided to all workers.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	ER.1.2

Benchmark Details	Employers shall assign responsibility for the administration of human resources to a clearly defined and adequately qualified staff member or staff members and ensure workers at all levels receive communication and training about existing policies and procedures or any revisions.
Finding Details	Subcontractor does not provide any ongoing training to workers on all FLA's Code elements and Employment Functions
Recommendation for Immediate Action	Subcontractor should provide ongoing training to workers on all FLA's Code elements and Employment Functions.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	ER.1.1
Benchmark Details	Employers shall have in place written policies and practices and maintain proper and accurate records governing all aspects of employment from recruitment, hiring and probation, including written terms and conditions of employment, job descriptions, administration of compensation, and working hours for all positions, through to retrenchment and termination processes.
Finding Details	Subcontractor does not have policies and procedures regarding Termination and Retrenchment
Recommendation for Immediate Action	Subcontractor should have policies and procedures regarding Termination and Retrenchment.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	ER.6.1

Benchmark Details	Employers shall have written policies and procedures and implement practices that encourage ongoing training of all categories of workers with the goal of raising or broadening skills in order to advance in their careers within the factory or beyond.
Finding Details	Subcontractor does not have written policies and procedures on personnel development that encourage ongoing training with the goal of raising or broadening workers' skills so they can advance in their careers.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER.7.1
Benchmark Details	Employers shall have written policies and procedures with regard to performance reviews that outline the review steps and process, demonstrate linkages to job grading, prohibit discrimination, are provided in writing and seek feedback and agreement/disagreement from employees in writing, and that follow all local legal requirements.
Finding Details	Subcontractor does not have policies and procedures on performance reviews that include steps and processes, linkages to job grading, nondiscrimination, written feedback, and compliance with legal requirement
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
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	Subcontractor does not have policies and procedures on promotion, demotion and job reassignment.
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	FLA Code is not posted on the work floors.
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	Forty Seven Brand's Code is not posted on the work floors. The assessment was deployed for a facility with an approved subcontractor of 47 Brand which is located at one of the two buildings at the same compound. The facility has raw material warehouse, sample sewing and sample cutting; and subcontractor has cutting, sewing, and packing processes. They have separate work permits and sets of documents including worker registrations. The facility has a cutting section at a building across the street with separate working permission, where there are two different sister garment factories of subcontractor are located. After reviewing the planning & production records of the facility through the computer system; it is identified that 47 Brands' products are being produced in not only at the approved subcontractor, but also other subcontractors at different addresses for 47 Brands' production. All information related to unauthorized subcontracting were verified with production order numbers for 47 Brands.
Recommendation for Immediate Action	The brand's code should be posted on the work floors. Only approved subcontractors should be used on brand's production.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	ER.3.1
Benchmark Details	Employers shall provide an orientation to new employees at the time of hiring, which includes explanations of the employers' rules, compensation package and policies for human resources, grievance systems, industrial relations, including respect of the right to freedom of association, workers' rights and responsibilities, FLA Code of Conduct, health and safety, and environmental protection.
Finding Details	Subcontractor workers were not aware of any of FLA's code elements and employment functions.

Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	

Health, Safety And Environment (HSE)

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	There are directional emergency lighted signs for evacuation to emergency exit door at the factory accessory warehouse, however that door has been eliminated and not used as emergency exit according to the evacuation plans. (The directional emergency lightings have been removed and the evacuation plot plan is updated) Evacuation route at subcontractor's cutting section is wrong due to layout change.
Recommendation for Immediate Action	Evacuation route should be marked correctly on the work floors.
Compliance Classifications	Immediate Action Required
Local Law	
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	Fire alarm system panels are giving errors at both factory's and subcontractor's factory's (cutting) premises and the subcontractor's sister companies premises which is located across the street.
Recommendation for Immediate Action	Fire alarm system should be functioning properly in all premises.
Compliance Classifications	Immediate Action Required
Local Law	
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	Secondary containment is missing at the chemical storage and for oil placed at the compressor room. (Oil is removed to chemical storage), The chemical storage is located at the garden of the factory and expose to direct sunlight. There were un-labeled bottles on the work floors.
Recommendation for Immediate Action	Secondary containment should be provided for all chemicals. Chemicals should not be exposed to direct sunlight and all the bottles should be labeled.
Compliance Classifications	Immediate Action Required
Local Law	
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	Meal samples have not been maintained at subcontractor for 72 hours.
Recommendation for Immediate Action	Meal samples should be maintained for 72 hours at least.
Compliance Classifications	Immediate Action Required
Local Law	
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	Lighting assessment is not conducted at night hours at both Subcontractor and factory. Moreover, 19 locations out of 34 is below the limits at factory according to day time evaluation.
Recommendation for Immediate Action	Lighting assessment should be conducted at night hours as well and the current lighting organisation should be improved.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	HSE.14.1
Benchmark Details	All production machinery, equipment and tools shall be properly guarded and regularly maintained.
Finding Details	Finger guards are missing at factory's single needle sewing machines. (Provided during the assessment) Two lower pulley guards are missing at sewing machines; one at subcontractor and one at factory (Provided during the assessment)

Recommendation for Immediate Action	Finger guards and pulley guards should be implemented to all sewing machines.
Compliance Classifications	Immediate Action Required
Local Law	
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	2 fire extinguishers are blocked at factory's warehouse. (Addressed during the audit) There are two locations with fire extinguisher sign but the fire extinguishers are missing. (Addressed during the audit) Two fire extinguishers are not mounted. (Addressed during the audit) There were used eye wash solution bottles at the stain removal section although they are for one time usage only.
Recommendation for Immediate Action	Fire extinguishers should be marked, mounted and not blocked. Eye wash solution should be renewed and awareness should be raised as they are for one time usage only.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	HSE.1
Benchmark Details	Employers shall comply with all national laws, regulations and procedures concerning health, safety, and the environment.

<p>Finding Details</p>	<p>Emergency action team list posted on the work floors are not updated. (2 workers from fire extinguishing team, 1 worker from protection team, 2 workers from rescue team and 2 workers from first aid team are no longer working) Nearly 50% of Subcontractor workers reported that they have not seen the workplace doctor and do not know him while they have periodical health check reports. Ergonomic mats are not provided to all standing workers. (Provided only to ironing workers for isolation) It is noted that one worker was using air gun to clean himself. Evacuation plot plans needs to be revised as they need to turn 90 degrees to show the layout correctly. (Addressed during the assessment)</p>
<p>Recommendation for Immediate Action</p>	<p>Emergency action team list posted on the work floors should be updated. Subcontractor workers periodical health checks should be conducted properly. Ergonomic mats are not provided to all standing workers. (Provided only to ironing workers for isolation) Air gun should not be used by workers to clean clothes. Evacuation plot plans needs to be revised as they need to turn 90 degrees to show the layout correctly. (Addressed during the assessment)</p>
<p>Compliance Classifications</p>	<p>Immediate Action Required</p>
<p>Local Law</p>	
<p>Benchmark ID</p>	<p>HSE.8</p>
<p>Benchmark Details</p>	<p>Workers shall be provided with training on the use and maintenance of personal protective equipment. Training shall be upon hire with periodic refresher training offered to all workers. Management will ensure use of PPE as necessary.</p>
<p>Finding Details</p>	<p>It is noted that one worker using transpallet was wearing slippers instead of protective shoes. Several workers were not using eye guard at overlock machines. Dust mask was being used at the stain removal section.</p>
<p>Recommendation for Immediate Action</p>	<p>Protective shoes should be used by workers using transpallet, eye guards should be used by sewing workers, proper mask should be used at the stain removal section and awareness should be raised for using proper equipment.</p>

Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	HSE.10.2
Benchmark Details	Workers shall have free access to MSDS.
Finding Details	MSDS are not posted at the chemical storage area. (Posted during the assessment)
Recommendation for Immediate Action	MSDS should be posted at the chemical related areas.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	HSE.9.2
Benchmark Details	Workers shall receive training, appropriate to their job responsibilities, concerning the hazards, risks and the safe use of chemicals and other hazardous substances.
Finding Details	Chemical handling training was not efficient as stain removal section workers were using dust mask instead of filtered mask. There were unlabeled bottles and used disposable eyewash solutions in the workplaces.
Recommendation for Immediate Action	Chemical handling training should be provided properly and the awareness of the workers should be raised.
Compliance Classifications	Immediate Action Required
Local Law	

Hours Of Work (HOW)

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	20 subcontractor and 10 factory workers are sampled and it is noted that 7 out of 20 subcontractor workers have worked more than 11 hours per day once or twice in August 2022 (Min 12 hrs 15 min, max 13 hrs and 15 min), 10 out of 20 subcontractor workers 1 to 6 times in January 2023 (Min 12 hrs 45 min, max 13 hrs 15 min), 14 out of 20 subcontractor workers 1 to 4 times in April 2023 (All workers 12 hrs 15 min).
Recommendation for Immediate Action	Working hours should not exceed 11 hours per day.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	HOW.11.1
Benchmark Details	Employers shall provide workers with paid annual leave as required under national laws, regulations and procedures.
Finding Details	Annual leave days have not been used completely and accumulated from previous years for 4 subcontractor workers for 6 to 7 days and for 45 factory workers for 1 to 13 days.
Recommendation for Immediate Action	Annual leave days should be used on time each year.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	HOW.21

Benchmark Details	Other than in exceptional circumstances, the total weekly work hours (regular work hours plus overtime including any alternative shifts such as 4x4 or 3x3) shall not exceed 60 hours per week.
Finding Details	20 subcontractor and 10 factory workers are sampled and it is noted that working hours exceeded 60 hours (regular + overtime) per week for 2 out of 20 subcontractor workers once in August 2022 (Min 61 hrs 15 min), for one subcontractor worker once in January 2023 (64 hrs 15 min), and for 6 subcontractor workers once or twice in April 2023 (65 hrs to 78 hrs 15 min).
Recommendation for Immediate Action	Working hours should not exceed 60 hours per week.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	HOW.2
Benchmark Details	Workers shall be entitled to at least 24 consecutive hours of rest in every seven- day period. If workers must work on a rest day, an alternative consecutive 24 hours must be provided within that same seven-day period or immediately following.
Finding Details	20 subcontractor and 10 factory workers are sampled and it is noted that 7th day rest is not guaranteed to 13 subcontractor workers once or twice (Min 7, max 17 days) in April 2023.
Recommendation for Immediate Action	7th day rest should be guaranteed for all workers.
Compliance Classifications	Immediate Action Required
Local Law	

Nondiscrimination (ND)

Benchmark ID	ND.4
Benchmark Details	Employers may not request the disclosure of any personal, non-job related information during the application, recruitment, or hiring process, including but not limited to gender, race, religion, disability, sexual orientation, nationality, political opinion, social group, ethnic origin, or marital status.
Finding Details	The work application forms have questions regarding the birth dates and military service. (The management stated that they don't prefer young workers due to special work hours arrangements)
Recommendation for Immediate Action	The work application forms should not have potential discriminatory questions.
Compliance Classifications	Immediate Action Required
Local Law	

