



FAIR LABOR  
ASSOCIATION®

## INDEPENDENT EXTERNAL ASSESSMENT REPORT



COMPANIES: Fast Retailing Co., Ltd.  
COUNTRY: Turkey  
ASSESSMENT DATE: 07/27/17  
ASSESSOR: FLA EMEA  
PRODUCTS: Apparel  
NUMBER OF WORKERS: 70

## Summary of Code Violations

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.

While it is important to note when violations of the FLA Workplace Code of Conduct occur, the purpose of these assessments is not simply to test compliance against a particular benchmark, but rather to develop an understanding of where and how improvements can be made to achieve sustainable compliance. Code of Conduct violations can be found throughout the course of an assessment of the employment and management functions, and are addressed in companies' action plans.

## Findings and Action Plans

### FINDING NO.1

#### SUSTAINABLE IMPROVEMENT REQUIRED

#### FINDING TYPE: Policies & Procedures (Macro)

##### Finding Explanation

1. The factory does not have written policies on Recruitment, Hiring & Personnel Development, Compensation, Hours of Work, Industrial Relations, Grievance System, and Termination & Retrenchment and Environmental Protection. ER.1 ER.23 ER.25 ER.27 ER.28 ER.29 ER.30 ER.31 ER.32 HSE.1

2. The factory does not have written procedures on any of the employment functions; Recruitment, Hiring & Personnel Development, Compensation, Hours of Work, Industrial Relations, Grievance System, and Termination & Retrenchment and Health, Safety and Environmental Protection. ER.1 ER.19 ER.23 ER.25 ER.27 ER.28 ER.29 ER.30 ER.31 ER.32 HSE.1

3. The factory does not clearly define the responsible/accountable person(s) for recruitment, hiring and personnel development, compensation, hours of work, termination and retrenchment, industrial relations, workplace conduct and discipline, grievance system, environmental protection in writing. ER.1

4. The factory does not have written procedures on Health and Safety, however some documents exist. Current documents do not include measures to protect the reproductive health of workers through minimizing exposure to workplace hazards, steps for workers to raise health and safety concerns and protection against retaliation for workers who raise Health & Safety concerns. ER.31 HSE.12 ND.8

##### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.19, ER.23, ER.25, ER.27, ER.28, ER.29, ER.30, ER.31, and ER.32; Non-Discrimination Benchmark ND.8; Health, Safety & Environment Benchmark HSE.1 and HSE.12)

#### COMPANY ACTION PLANS

##### Action Plan no 1.

##### Description

1. In our factory working principles and codes of conduct are defined and presentations will be made to employees.
2. Employment, Recruitment and Personnel Development, Compensation, Business World, Industrial Relations, Complaints System, Health, Safety and Environmental Protection Policies. etc. will be determined. the specified policies and procedures will be announced to the workers and posted on key points in factory within a specific program.
3. The factory will designate the responsible person for recruitment, recruitment and staff development, compensation, working hours.industrial relations, workplace behavior and discipline, complaints system, a written procedure will be prepared.

4. Written procedures on health and safety will be set up in the plant. The existing documents will be reviewed and the deficiencies will be eliminated. All measures will be taken to minimize the health and safety concerns of workers.

## FINDING NO.2

### SUSTAINABLE IMPROVEMENT REQUIRED

#### FINDING TYPE: Training (Macro)

##### Finding Explanation

1. The factory does not provide orientation training to workers. ER.15
2. The factory does not provide on-going training to workers on any of the Employment Functions except for Health & Safety. ER.1 ER.25
3. The factory does not provide specific training to supervisors on any of the Employment Functions. ER.1 ER.17 ER.27
4. Workers with maintenance responsibilities do not receive specific training on maintenance safety. HSE.14
5. The factory does not provide a copy of workplace rules is not provided during orientation. ER.15

##### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.15, ER.17, ER.25, and ER.27; Health, Safety & Environment Benchmark HSE.14)

### COMPANY ACTION PLANS

#### Action Plan no 1.

##### Description

1. Orientation training will be given to the personnel who started work.
2. The necessary information shall be provided within the scope of the rights and responsibilities of employees based on the criteria determined within the scope of legal legislation and FLA standards. Caretta will communicate with FLA and get guidance from them while in progress.
3. Our responsible staff in human resources will provide a training covering recruitment, Hiring & Personnel Development, Compensation, Hours of Work, Industrial Relations, Grievance System, Workplace Conduct and Discipline, Termination & Retrenchment and Health, Safety and Environmental Protection.
4. Special training on maintenance safety will be provided for employees with maintenance responsibilities.
5. The factory will provide a copy of the workplace rules during the orientation.

## FINDING NO.3

### SUSTAINABLE IMPROVEMENT REQUIRED

#### FINDING TYPE: Communication & Worker Involvement (Macro)

##### Finding Explanation

1. The worker integration component is missing across Recruitment, Hiring & Personnel Development, Compensation, Hours of Work, Industrial Relations, Workplace Conduct & Discipline, Grievance System, Termination & Retrenchment and Environmental Protection. Workers are neither systematically integrated nor consulted in decision-making processes. ER.1 ER.25

##### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1 and ER.25)

### COMPANY ACTION PLANS

## Action Plan no 1.

### Description

1. Recruitment and Personnel Development, Compensation, Working Hours, Industry Relations, Workplace Behavior and Discipline, Complaints System, Termination Recycling and Environmental Protection etc. will be integrated into decision making processes.

## FINDING NO.4

### IMMEDIATE ACTION REQUIRED

#### FINDING TYPE: Recruitment, Hiring & Personnel Development

### Finding Explanation

1. Workers' employment contracts include inappropriate clauses and lack information on some laws and regulations. For example:

a. Workers must accept and commit to work for all temporary and permanent jobs in the same company even if they are required to work abroad. (Section 1.5) ER.1

b. In cases where the employer deems overtime work necessary, workers accept that they give approval for overtime work. Workers must accept work overtime during rest days and public holidays and make compensatory work in case it is needed according to Turkish Labor Law. HOW.8.2, HOW.8.5

2. The factory employs one disabled worker which is a violation of legal requirements that state at least 3% of the total workforce (2 disabled workers) should be composed of disabled workers. The factory contributes to the National Employment Agency as allowed under local law to hire one more disabled worker. ER.3, ND.2

### Local Law or Code Requirement

Turkish Labor Law (4857), Article 22 and 30; FLA Workplace Code (Employment Relationship Benchmarks ER.1 and ER.3, Nondiscrimination Benchmark ND.2; Hours of Benchmarks HOW.8.2 and HOW.8.5)

### Recommendations for Immediate Action

1. Review the employment contracts and ensure that:

a. A statement is added on requiring worker's approval before alterations are made in job position or in the workplace.

b. The statement is revised as not to oblige workers to work overtime or conduct compensatory work. A statement is added that overtime work is voluntary.

2. Hire one more disabled worker as legally required.

### COMPANY ACTION PLANS

## Action Plan no 1.

### Description

1. Workers' employment contracts will be audited and the items containing inappropriate provisions will be removed.

2. Necessary applications have been made for the disabled personnel to be employed in terms of legal legislation.

## FINDING NO.5

### SUSTAINABLE IMPROVEMENT REQUIRED

#### FINDING TYPE: Recruitment, Hiring & Personnel Development

### Finding Explanation

1. There are no written job descriptions for any position when personnel need to be hired. ER.1

2. The factory does not conduct performance reviews for any workers. ER.29

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1 and ER.29)

## COMPANY ACTION PLANS

Action Plan no 1.

Description

1. When the staff needs to be recruited, a written job description will be made for any position.
2. The factory will evaluate the performance for employees. The factory has a bar-code reading system. The results obtained with the bar-code reading system will be used in the performance rating of the workers.

## FINDING NO.6

### IMMEDIATE ACTION REQUIRED

#### FINDING TYPE: Hours of Work

Finding Explanation

1. During the assessment only one pregnant worker was in the factory. This worker was notified that she can leave the factory 1.5 hours earlier than the other workers according to labor law. However, according to record review of this worker, this worker generally comes in to work 30 minutes to one hour later than others and leaves with the other workers since she wants to use company transportation. Even though some days this worker works less than 7.5 hours, which is the legal limit, she usually works an extra half an hour which exceeds the legal limit. ER.14

2. Working hours exceed the legal limit of 11 hours per day in July for approximately five days. According to record review, five workers out of 12 sampled workers worked more than 11 hours with a maximum excessive working time of 25 minutes. HOW.1 HOW.8

3. Working hour records do not contain identification of pregnant or lactating women and young workers; however, the factory keeps a separate list of special categories of workers. HOW.5

Local Law or Code Requirement

Regulation Related to Working Conditions of Pregnant and Breast Feeding Workers Article 9; Regulation of Overtime Working Related to Labor Law; Article 8; FLA Workplace Code (Employment Relationship ER.14, Hours of Work Benchmarks HOW.1, HOW.5, and HOW.8)

Recommendations for Immediate Action

1. Ensure that pregnant workers working hours do not exceed 7.5 hours per day.
2. Ensure that daily working hours do not exceed 11 hours a day as legally required.

## COMPANY ACTION PLANS

Action Plan no 1.

Description

1. We will make necessary arrangements for the protection of pregnant personnel and working hours.
2. The daily working time will be limited to 11 hours.
3. In case we have pregnant, lactating women and young workers; we will separate list for them and keep records separately. (Currently we do not have any)

## FINDING NO.7

## IMMEDIATE ACTION REQUIRED

### FINDING TYPE: Compensation

#### Finding Explanation

1. The factory does not include meal and transportation allowances in their calculation of termination pay outs, as legally required. ER.19 C.1 C.5
2. 40% of the workers have not taken their annual leaves in a timely period. Maximum accumulated annual leave days are 65 days. ER.22 HOW.11 HOW.14

#### Local Law or Code Requirement

Turkish Labor Law (1475), Article 14; Supreme Court 9th Civil Chamber Verdicts 2008/1635E 2009/14798K, 2007/38244E, 2009/3712K, 2007/24490E, 2008/20203K, 2007/24005E, and 2008/20203K; Supreme Court 9th Civil Chamber Verdicts E.1992/15138,K. and 1993/5687,T. 13.4.1993; Turkish Labor Law (4857) Article 53, FLA Workplace Code (Employment Relationship Benchmark ER.19 and ER.22; Compensation Benchmarks C.1, C.5; Hours of Work Benchmarks HOW.11, HOW.14)

#### Recommendations for Immediate Action

1. Ensure that the severance payment calculations for termination pay outs include transportation and meal allowances, as legally required.
2. Ensure that all workers take their annual leaves in one-year period as legally required.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

1. Factory started meal allowances in their calculation of termination pay outs. Factory have not provided transportation allowance to any employee since its establishment.
2. The permission of all staff with accumulated annual leave rights will be granted.

## FINDING NO.8

## SUSTAINABLE IMPROVEMENT REQUIRED

### FINDING TYPE: Grievance System

#### Finding Explanation

1. There is one suggestion box in the factory which is located in the entrance of the production area instead of places that would ensure confidentiality such as restrooms or locker rooms. Workers do not like to use this box. ER.25
2. The factory does not maintain documentation in relation to grievance processes. ER.2

#### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.2, and ER.25)

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

1. Suggestion boxes will be placed in the toilets.
2. A documentation system will be established for complaints processes.

## FINDING NO.9

## SUSTAINABLE IMPROVEMENT REQUIRED

### FINDING TYPE: Industrial Relations

#### Finding Explanation

1. The Worker representatives' duties are not clearly defined in the election announcement, which only states that worker representatives shall join HSE Committee meetings. Consequently, worker representatives only attend Health & Safety meetings as legally required. They do not have any other responsibilities to represent workers, such as conveying workers' suggestions, grievances, or problems to management. The general workforce is not aware of the representatives' responsibilities. ER.25

#### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER. 25)

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

1. Training related to the duties and responsibilities of employee representatives will be provided. Employees will be informed about their responsibilities to represent employees, such as giving suggestions, complaints or management issues.

## FINDING NO.10

## IMMEDIATE ACTION REQUIRED

### FINDING TYPE: Workplace Conduct & Discipline

#### Finding Explanation

1. The factory does not keep records for disciplinary actions, therefore, workers do not sign written records of disciplinary actions. According to factory management there has been no disciplinary case in the past, including termination of workers due to disciplinary action. ER.2 ER.27

2. Although it is not implemented, there is a clause in the employment contract that allows monetary penalty for disciplinary actions. (In cases where workers do not come to work without rest day permission, payment is deducted in addition to the payment of the day of absence) H/A.2

3. Disciplinary actions are not witnessed by a third party during imposition. ER.27

#### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.2, and ER.27; Harassment or Abuse Benchmark H/A.2)

#### Recommendations for Immediate Action

1. Keep written records of disciplinary actions and ensure workers sign all written records of disciplinary action against them.
2. Remove the clause that allows monetary penalty in workplace rules.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

1. Workplace discipline regulations will be prepared and all personnel will be informed. a discipline registration system will be established in the workplace.
2. Provisions on fines will be removed in the employment contract.
3. Disciplinary punishments will be determined by regulations and all employees will be informed. A disciplinary committee will be established in order for the disciplinary system to be objective.

## FINDING NO.11

### IMMEDIATE ACTION REQUIRED

#### FINDING TYPE: Environmental Protection

##### Finding Explanation

1. The factory has not identified whether its on-site operations generate any negative environmental impacts. ER.31
2. The factory does not separate hazardous and non-hazardous waste. Therefore, chemical waste is not properly managed. HSE.1 HSE.9
3. There are no segregated waste streams for all solid wastes in the factory. Only paper wastes are placed separately from all other wastes, however, it is not well protected and is in an open area. Paper wastes are placed next to other mixed wastes with no label. HSE.1
4. Hazardous waste storage containers do not have labels. Furthermore, the factory does not dispose its hazardous waste in a proper way. There is no licensed waste handler that receives hazardous waste. HSE.1 HSE.4, HSE.9
5. The factory does not have an environmental permit exemption. HSE.4
6. There is no approved waste management plan in the factory; this plan should be approved of by the provincial department of environment as per local law. HSE.4
7. The factory does not have any liability insurance for hazardous waste.
8. Oil-contaminated water that comes out of the dryer and compressor is directly discharged outside on to the ground. HSE.9
9. The factory does not provide secondary containment for any chemical in chemical storage area. HSE.9

##### Local Law or Code Requirement

Regulations for Permits and Licenses to be Obtained, Required by the Environmental Law; Waste Management Regulation Articles 9, 13 and 16, Regulation for Control of Hazardous Wastes, Article 9; Regarding Health & Safety Precautions in Work with Chemical Substances (August 12, 2013), No. 28733, Article 7; FLA Workplace Code (Employment Relationship Benchmarks ER.31; Health, Safety, & Environment Benchmarks HSE.1, HSE.4 and HSE.9)

##### Recommendations for Immediate Action

1. Segregate and store all kind of wastes in separate places according to their types – hazardous and non-hazardous. Ensure that storage areas are secure and protected.
2. Segregate solid waste in waste streams in protected areas, these must all be labelled.
3. Ensure that all wastes are disposed properly.
4. Commission a licensed hazardous waste handler to dispose of hazardous waste safely.
5. Collect the contaminated water that comes from the dryer and compressor in barrels and dispose of it properly.
6. Provide secondary containment for the chemicals in the chemical storage area.

### COMPANY ACTION PLANS

#### Action Plan no 1.

##### Description

1. Necessary actions will be taken to ensure that the operations on the field have created any adverse environmental impact.
2. Disposal areas will be established within the factory for hazardous and non-hazardous wastes. Agreed with a waste management company to implement necessary procedures in Factory.
3. An area was created for all waste in the factory. This area also separates domestic wastes, chemical wastes and textile wastes.
4. Hazardous waste storage containers will be labeled with assistance of waste management consultant company.
5. Apply to the official institutions for environmental permit exemption.



6. Agreed with a waste management company certified by government to implement necessary procedures in factory.
7. The factory made liability insurance for hazardous waste.
8. Necessary precautions will be taken to minimize the waste oil from being discharged from the compressor and make sure the waste oil will be handled or collected properly.
9. Secondary protection facilities will be provided for chemicals in the chemical storage area.

## FINDING NO.12

### IMMEDIATE ACTION REQUIRED

#### FINDING TYPE: Health & Safety

##### Finding Explanation

1. The factory has not conducted an earthquake resistance test. ER.31 HSE.1
2. There was no insulating mat in front of the electrical panel in the warehouse. HSE.13
3. The shelves in the warehouse do not have any sign that indicates the load limit. Additionally, high piling on the shelves is observed in office room in the warehouse. HSE.1
4. The factory does not provide adjustable chairs for the sitting workers. Furthermore, the factory does not provide anti-fatigue mats for any standing workers, including workers in the quality control section. In addition, the factory does not take proactive steps to reduce repetitive-motion stress or injuries. HSE.17
5. The factory conducted thermal measurements in March 2017 which is not a summer month, such as July or August. Especially in the ironing section, thermal comfort can be a concern. HSE.13
6. The pipes of the press and iron machines were not protected with proper insulation material to protect the workers from the heat. HSE.13
7. Safety instructions are not posted near machines except the steam boiler and pressure vessel. HSE.14

##### Local Law or Code Requirement

Health and Safety Law, 6331, Article 4 and 5; Regulation about Requirements of Using Workplace Equipment, 25.04.2013, Article 9, (Addition 1) Article 2.8.1; Regulation for Health and Safety Requirements in Workplaces and its Extension Buildings, (Addition 1) Articles 3 and 19, Turkish Earthquake Code 2007 and the Content of Performance Reports under the Impacts of Earthquake; FLA Workplace Code (Employment Relationship Benchmark ER.31; Health, Safety & Environment Benchmarks HSE.1, HSE.13, HSE.14 and HSE.17)

##### Recommendations for Immediate Action

1. Conduct an earthquake resistance test.
2. Provide insulation mats for the electrical panel in the warehouse.
3. Ensure that thermal measurement is renewed and conducted in July or August.
4. Cover ironing section pipes with the proper insulation material to prevent heat conductance.
5. Provide safety instructions for all machines in the factory and post them near the machines.

### COMPANY ACTION PLANS

#### Action Plan no 1.

##### Description

1. Earthquake analysis will be applied to the relevant institution.
2. Electrical insulation pads is placed in front of all electrical panels in the factory.
3. Signs indicating the load limit shall be placed on all shelves in the warehouse.
4. Chairs of factory workers are adjustable chairs, anti-fatigue mats will be provided for standing workers.
5. Thermal measurements will be made in July and August at the factory.
6. To protect workers from heat, the pipes of press and iron machines shall be protected with appropriate insulation material.

7. Safety instructions for all the machines used at the firm will be prepared.

## FINDING NO.13

### IMMEDIATE ACTION REQUIRED

#### FINDING TYPE: Health & Safety

##### Finding Explanation

1. Grounding measurements are only performed on electrical panels; no grounding measurements have been performed on production machines and equipment. HSE.13
2. There is an electric box in the chemical storage area. This box was found opened and filled with dust which is a fire hazard. HSE.13
3. The factory does not have an Electrical Internal Wiring report which is legally required. HSE.4
4. The factory does not properly implement a lockout tag-out program by locking out equipment when needed. HSE.14

##### Local Law or Code Requirement

Electrical Installation Regulation; Protection of Buildings from Fire Regulation, Article 68; Regulation for Health and Safety Requirements in Workplaces and its Extension Buildings, (Addition 1) Articles 5; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.4, HSE.13, and HSE.14)

##### Recommendations for Immediate Action

1. Perform grounding measurements on production machines and equipment.
2. Ensure that electrical boxes are lint free and the covers of the boxes are kept close.
3. Provide Electrical Internal Wiring report.

### COMPANY ACTION PLANS

#### Action Plan no 1.

##### Description

1. Grounding measurements shall be made in production machines
2. All electrical components is removed in the area of chemical storage.
3. Electrical Internal Cabling report will be available
4. Factory will set a lockout/ tagout system for all necessary equipment. Necessary information will be taken from Health and Safety consultant.

## FINDING NO.14

### IMMEDIATE ACTION REQUIRED

#### FINDING TYPE: Health & Safety

##### Finding Explanation

1. The factory does not commission fire risk assessments by a third-party expert. HSE.1 HSE.5
2. Not all fire extinguishers are placed, maintained and stocked properly: HSE.6
  - a. One of the fire extinguishers in the warehouse was placed on the ground instead of hung on the wall at a proper level. Moreover, the plastic covering has not been removed from the extinguisher.
  - b. One fire extinguisher was blocked with product boxes in the cutting section.

- c. There is an old fire extinguisher sign which has not been removed in the model section although the fire extinguisher's location has changed.
3. One of the evacuation maps in the warehouse was not placed to the correct location since the location of the map has been changed. HSE.5  
The emergency exit door of the model section opens inwards. HSE.5
4. One of the emergency lights, located at the first floor near the sewing section, was not operating. HSE.6
5. One car was parked near the emergency assembly area which blocked access to the emergency assembly area. HSE.5
6. There is no periodic check system for the fire hoses in the factory. HSE.6
7. There are no signs on the fire control panel that shows the fire alarm signal locations in the factory. Therefore, in case of emergencies it is hard to understand where the emergency has occurred. HSE.6

#### Local Law or Code Requirement

Workplace Health and Safety Law, 6331, Article 11; Protection of Buildings from Fire Regulation, Articles 47, 71, 72, 76, 99 and 100  
Regulation for Health and Safety Requirements in Workplaces and its Extension Buildings, (Addition 1) Articles 10 and 12 and 14; FLA  
Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.5, and HSE.6)

#### Recommendations for Immediate Action

1. Ensure that fire extinguishers are hung on the wall at a proper level and plastic bags are removed for easy access.
2. Locate the evacuation maps in correct places.
3. Remove old signs of the fire extinguisher, keep firefighting equipment clear from obstruction at all times and conduct regular checks. Ensure that all emergency exits open outwards as legally required.
4. Ensure that emergency lights are operating all the time and regularly checked.
5. Cease car park practice in front of the emergency assembly area.
6. Conduct regular checks of the fire hoses.
7. Provide signs on fire control panel that leads to the location of the alarm signals.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

1. Fire risk assessment will be made at factory and shared with FLA
2. All fire extinguishers are placed firmly and will be installed and maintained according to the legislation. A checklist will be prepared for monthly check.
3. Evacuation maps will be placed in correct location in storage area. The emergency exit door of the model section will be opened to the outside and it is sufficient for a proper emergency exit
4. All emergency exit lamps in the company will be actively operated and check sheet will be placed near emergency lights
5. Vehicle parking in front of the assemble area will be prohibited. A sign will be placed as " No parking"
6. A periodic control system will be installed for the fire hoses in the factory
7. Signs will be placed on the fire control panel indicating the fire alarm signals at the factory

## FINDING NO.15

## IMMEDIATE ACTION REQUIRED

### FINDING TYPE: Health & Safety

#### Finding Explanation

1. The chemical storage is located in a small room in the factory at the entrance floor and it is not ventilated properly. Moreover, there are unused electric stoves next to chemical cans. Even if they were not connected to electricity at the time of the assessment, electric

stoves should not be placed next to flammable liquids. HSE.9

2. There is no chemical inventory in the factory. HSE.9

3. The factory does not provide proper PPE to the following workers:

a. There is a gluing process that is conducted in the sewing section next to sewing workers. Two chemicals are used, one is a glue and the other one is a solution. None of the workers wear personal protective equipment during the gluing process even though they are provided with masks. Furthermore, the provided masks are medical masks which are not convenient for chemical usage. HSE.7 HSE.8

b. Quality Control workers use stain removing spray on their desk without wearing proper PPE. HSE.7

4. Glue and solution chemicals are put in plastic bottles and located in each workstation of the workers in sewing section without labels. HSE.9

5. Material Safety Data Sheets (MSDS) were not posted in areas that use chemicals, such as glue section, however at the second day of the assessment they were provided. HSE.10

6. Stain removing spray MSDS is not available in this section (Kirmizigul Stain Remover Spray). HSE.10 One of the MSDS forms which is provided to the assessor does not contain all sections (there should be 16 sections) which is legally required. HSE.10

7. There are two chemical spray cans on the shelf in the sewing section leader's room. MSDS forms were not available for these chemicals: CRM Cobra 300 and Best liquid Grease. According to management those chemicals have not been used for a long time. HSE.10

8. There is a thinner bottle in chemical room without Material Safety Data Sheet. HSE.10

9. There is no eye wash facility or shower in the factory. HSE.9

#### Local Law or Code Requirement

Regulation Regarding Health & Safety Precautions in Work with Chemical Substances (August 12, 2013), No. 28733, Articles 6, 7, 8 and 9; Regulation of Safety Data Sheets for Harmful Materials and Substances (29204) Article 6, FLA Workplace Code (Health, Safety & Environmental Benchmarks HSE.1, HSE.7, HSE.9, and HSE.10)

#### Recommendations for Immediate Action

1. Ensure that the chemical storage area is properly ventilated and any source of heat is removed from this area. Also ensure that there is no open source of electricity such as electric box or sockets without cover.

2. Provide proper Personal Protective Equipment to the glue section workers according to instructions on the MSDS forms of the chemicals. Provide training to the workers on using PPEs.

3. Ensure that sewing section workers are not exposed to chemicals used for gluing process. Provide a separate area for gluing section workers.

4. Ensure that all chemicals are properly labelled.

5. Create a list for all chemicals that are used in the factory and provide proper MSDS forms including required instructions and complete sections, supplied by the authorized establishments, in the local language for all chemicals. Post MSDS forms where chemicals are used and inform the workers.

6. Ensure that only workers who received proper training and use proper PPE are exposed to chemicals such as stain removing sprays.

7. Provide eye wash facilities in the chemical usage sections. Train eligible workers to use eye wash.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

1. All kinds of electrical components that may cause danger in the room where chemical materials are stored will be removed and a ventilation system will be installed.

2. Chemical inventory book will be organized in factory.

3. The employees in the sewing department have to work in pairs. It will be ensured that they (Sewing and glueing) use protective materials during chemical use. Also, masks suitable for chemical usage will be used.

4. Bottles of all chemical substances in work tables shall be labeled.
5. MSDS forms will be published in the areas where all chemical substances contained in the plant are used.
6. MSDS forms will be provided for all stain removal spray used in the plant.
7. There will be no chemical products in the plant that do not have the MSDS form. Old unused materials will be destroyed. It is completed.
8. Unused old chemical material boxes will be destroyed. Thinner is not used in factory and it is immediately removed.
9. Eye wash will be provided.

## FINDING NO.16

### SUSTAINABLE IMPROVEMENT REQUIRED

#### FINDING TYPE: Health & Safety

##### Finding Explanation

1. The factory does not record small accidents that occur in the factory, for example small cuts and scratches that occur in the cutting section. ER.31.2, HSE.1, HSE.3

##### Local Law or Code Requirement

Duties and Responsibilities of Workplace Doctors Regulation Article 9/ 6 -7; Duties and Responsibilities of Health and Safety Specialists Regulation Article 9/ 3-4; FLA Workplace Code (Employment Relationship Benchmark ER.31.2, Health, Safety & Environmental Benchmarks HSE.1 and HSE.3)

### COMPANY ACTION PLANS

#### Action Plan no 1.

##### Description

1. For small accidents in the factory, an accident register book will be arranged.

## FINDING NO.17

### SUSTAINABLE IMPROVEMENT REQUIRED

#### FINDING TYPE: Termination & Retrenchment

##### Finding Explanation

1. The factory terminates workers at low season (January, February, March) due to the decrease of the workload. Five workers and nine workers were terminated due to low workload in January 2017 and January 2016 respectively. All legally required payments are made to the terminated workers. When the factory needs new workers at peak season, the factory gives priority to those workers to be hired. However, the factory does not have any written plan or procedure that explains retrenchment implementation including a plan that mitigates the adverse effects of such changes on workers. According to management, new workers are chosen for termination over workers who have been at the factory for a longer periods of time. This implementation is a regular practise in the factory. ER.32

##### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship ER.32)

### COMPANY ACTION PLANS

#### Action Plan no 1.

##### Description

1. the necessary announcements will be made before the end of the work flow so that the workers will not be adversely affected in case of a contraction that may occur from production. the procedures for this will be determined. Also written plan will be issued

and shared with workers.