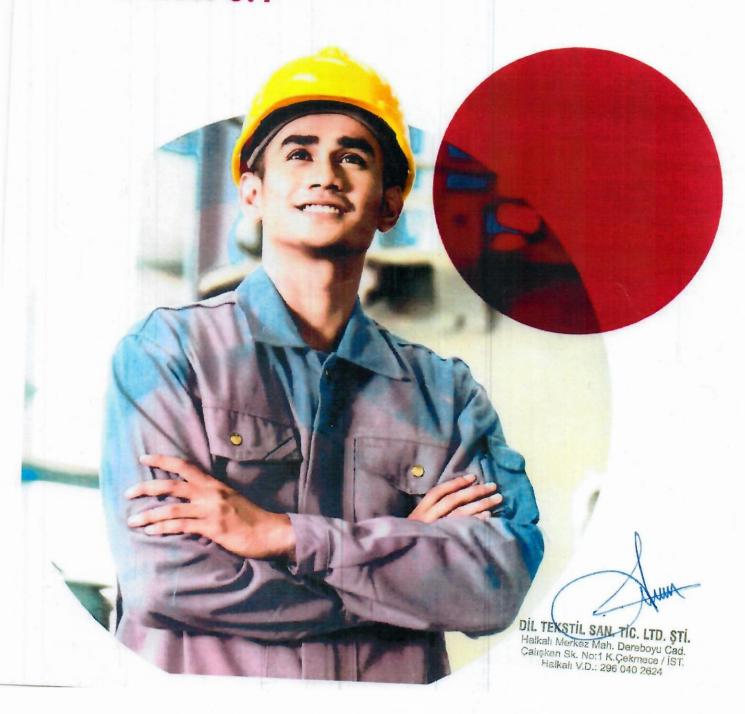


# SMETA Corrective Action Plan Report (CAPR)

Version 6.1



				Audit Details			
Sedex Company Reference: (only available on Sedex System)		ZC: 4056	ZC: 405626087 Sec (on Syst		te Reference: iilable on Sedex	ZS: 7	ZS: 405658788
Business name (Company name):		DIL TEKST	TIL SAN. VE	TIC. LTD. STI.			
Site name:		DIL TEKST	IL SAN. VE	TIC. LTD STI			
Site address: (Please include full address)		Halkali M Dereboy Caliskan	TEKSTIL SAN. VE TIC. LTD. STI.  cali Merkez Mah. eboyu Cad. skan sok. No:1 ukcekmece			Turkiy	ye
Site contact a title:	ind job	Mr. Fatih	TEKER - G	eneral Coordina	ator		
Site phone:		0090 5418	3834029	Site e-mo	ail:	Fatib	.teker@diltekstil.com.t
SMETA Audit P	illars:	□ Labou     Standard		Health & Safety (plus Environment 2-Pillar)	Environ	-	Business Ethics
Date of Audit:		29-30.06.2	2020				
Aud		y Name & Lo	ogo:		Report ( (If paid for by the please remove DIL TEKSTIL SA	e custo e for Se	mer of the site dex upload)
			Aud	it Conducted By			
ffiliate Audit Company		P	ourchaser		Reta	iler	
rand owner		N	IGO		Trade	e Union	
lulti-				Combine	ed Audit (select		

DIL TEKSTIL SAV TID. ŞTİ. Halkalı Merkez Mah Dereboyu Cad. Qalışkan 8r. No.1 k Çekmece / İST. Halkalı V.D.: 296 040 2624



## **Audit Content:**

- (1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 (March 2019) was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.
- (2) The audit scope was against the following reference documents

### 2-Pillar SMETA Audit

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

### 4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)
- (3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on
- (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.

DİL TEKSTİL SAN. TİC. LTD. ŞTİ. Halkalı Merkez Mah. Dereboyu Cad. Çalışkan Sk. Me:1 K.Çekmece / İST. 296 040 2624

Report reference: 20EMEA1428134

Date: 29-30.06.2020

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# **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): 6 individual interviews are conducted as regular but 1 more individual interview is conducted indivdually instead of group interview because of Corona covid 19 situtation.

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

Lead auditor: Ms. Zeynep AKGUN

Team auditor: Interviewers:

Report writer: Ms. Zeynep AKGUN

Report reviewer:

Date of declaration: 29-30.06.2020

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.

> DIL TEKSTI Haikalı Merkez Mah Çalışkan Sk. No. Halkalı V.b. 296 040 2624



# **Audit Parameters**

	Audit Parameters		
A: Time in and time out	Day 1 Time in: 09:00 Day 1 Time out: 18:00	Day 2 Time in: 09:00 Day 2 Time out: 13:00	Day 3 Time in: Day 3 Time out
B: Number of auditor days used:	1 auditor x 2 days		
C: Audit type:	Full Initial Periodic Full Follow-up Partial Follow-Up Partial Other If other, please define:		
D: Was the audit announced?	Announced Semi – announced: Will Unannounced	ndow detail: 4 weeks	
E: Was the Sedex SAQ available for review?			
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	Yes No If <b>Yes</b> , please capture deta	ail in appropriate audi	by algue
G: Who signed and agreed CAPR Name and job title)	Mr. Fatih TEKER – General C		by clause
d: Is further information available if yes, please contact audit company for details)	☐ Yes ☒ No		
Previous audit date:	NA		
Previous audit type:	NA		
Were any previous audits reviewed or this audit	☐ Yes ☐ No ☐ N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives

Halkalı Merkez Mal, Dereboyu Cad. Çalışkan St. No.1 K. Çekmece / İST. Halkalı V.D.: 296 040 2624

Audit company: ALGI INTERNATIONAL

Report reference: 20EMEA1428134

Date: 29-30.06.2020

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<b>SMETA</b>	SM	ETA*	
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A: Present at the opening meeting?	⊠ Yes □ No	☐ Yes ☐ No	To: -
B: Present at the audit?			☐ Yes ☐ No
	⊠ Yes □ No		☐ Yes ☐ No
C: Present at the closing meeting?	Yes □ No	☐ Yes ☐ No	☐ Yes ☐ No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	Na		Tes INO
E: If Union Representatives were not present please explain reasons why: conly complete if no union reps present)	There is no union		

DIL TEKSTIL SAN. TIQUED. STI. Halkalı Merkez Med. Dereboyu Cad. Canşkan Sk. No:1-KK ekmece / IST. Halkalı V.D.: 296 040 2624

Audit company: ALGI INTERNATIONAL

Report reference: 20EMEA1428134

Date: 29-30.06.2020

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## 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 rerecord actions taken and to categorise the status of the non-compliances.

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

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

### Root cause (see column 4)

Root cause refers to the specific procedure or lack of procedure which caused the issue to arise. Before a corrective action can sustainably rectify the situation, it is important to find out the real cause of the noncompliance 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
- 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
- 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 followup 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).

Halkalı Merkez Dereboyu Cad. Çalışkan Sk. No K.Çekmece / iST. Halkall V.D.: 296 040 2624

Report reference: 20EMEA1428134

Date: 29-30.06.2020



# **Corrective Action Plan**

	Status Open/Closed or comment		
	Verification Evidence and Comments Details on corrective action evidence		Y
	Agreed by Management and Name of Responsible Person: Note if management agree to the non- compliance, and document name of responsible person	Mr. Fatih TEKER	Mr. Fatih TEKER
ces	Verification Method Desktop / Follow-Up [D/F]	Desktop	Follow Up
on-complian	Timescale (Immediate, 30, 60, 90, 180,365)	09	90
Corrective Action Plan – non-compliances	Preventative and Corrective Actions Details of actions to be taken to clear non- compliance, and the system change to prevent re- occurrence (agreed between site and auditof)	It is recommended that sufficient number of first aid certified workers should be provide,d (5 for this facility)	It is recommended that daily total working hours should be limited to 11 hours / day.i
Correctiv	Root cause (completed by the site)	☐ Training ☐ Systems ☐ Costs ☐ lack of workers ☒ Other – please give details: Unexpected corona situation	☐ Training  Systems ☐ Costs ☐ lack of workers ☐ Other – please give details:
	Details of Non-Compliance	There are 2 first aid certified workers. 4 additional workers received training but their exams are delayed because of corona situation.  2 tane ilkyardım sertifikalı çolişan vardır 4 kişi daha eğitim almıştır fakat sınavları corona durumu dolayısı ile ertelenmiştir.	4 out of selected 7 employees worked more than 11 hours / day in pedk seasons. { 2 employees 15 times 11,5 – 12 hours / day , 1 employees 8 times 11,5 hours / day , 1 employee 7 times 11,5 hours / day in October 2019 and 1 employee 9 times 11,5 hours / day in 1,5 hours / day , 1 employee
	New or Carried Over Is this a new non-compliance identified at the followup or one carried over (C) that is still outstanding	New	New
	Non- Compliance Number Number of the non- compliance from the Audit Report, for example, Discrimination No.7	Health & Safety No:3 (1)	Working hours No:6 (2)

DIL TEKSTIL SANDAR. LTD. ŞTİ. Halkatı Merkez Mah. Dereboyu Cad. Calışkan SK. Nofl K.Çekmece / İST. Halkatı V.D.: 296 040 2624

SMETA Sedex Audit Reference: 2020TRZAA410903283 SMETA Corrective Action Plan Report (CAPR) Version 6.1

		Mr. Fatih TEKER		Mr. Fafih TEKER	
		Follow Up		Desktop Mr	
		09		09	
		It is recommended that all salaries should be paid officially to employees.		It is recommended that disposal records of all kind of waste should be kept.	
		Training Systems Costs Costs Costs Costs Costs Costs Sixe of workers Sive details:		Training Systems Costs Lack of workers Other - please	give details:
14 times 11,5 hours / day in January 2020.	Çalışanlar yoğun dönemlerde günde 11 saat üzerinde çalışmışlardır.	At least minimum salary wage amounts and some parts of overtime hours are paid officially via bank to employees, the rest of salaries and overtime payments are paid by cash.	Çalışanların en az asgari ücreet maaş miktarları ve bazı fazla mesaileri resmi olarak bankadan, kaları maaş farkları ve mesailer elden gayriresmi ödenmektedir.	They have a waste list to keep in control but they do not have documental records of waste disposal yet.	Kontrol altında tutmak amacıyla bir atlık listesi vardır fakat atlık bertaraf kayıtları mevcut değildir.
		X N		New	
		Wages & Benefits No:6		Environment 108 (4)	



	Any improvement actions discussed (Not uploaded on to SEDEX)			
relican	Roof cause (completed by the site)			
Corrective Action Plan - Observations	Details of Observation Details of Observation	Environmental impact analyze report is not prepared in the facility. Işletmede cevre boyut analizi hazırlanmamıştır.	Environmental part of SEDEX self assessment is not filled yet. SEDEX Ozdegerlendirme formunda Çevre Kısmı henüz doldurulmamıştır.	Business ethics part of SEDEX self assessment is not filled yet. SEDEX Ozdegerlendírme formunda iş Etiği kısmı henüz doldurulmamıştır.
	New or Carried Over Is this a new observation identified at the follow-up or one carried over [C] that is still outstanding	New	New	New
	Observation Number Intereference number of the observation from the Audit Report, for example, Discrimination	Environment No:10B (1)	Environment No:10B (2)	Business ethics No:10C (3)



Audit company: ALGI INTERNATIONAL

	Good examples	
Good example  Number  The reference number of the good example from the Audit Report, for example,	Details of good e.	Any relevant Evidence and Comments
Wage & Benefits No: 5 (1)	Lunch is provided free of charge to all employees. Yemek tüm çalışanlar için ücretsiz sağlanmaktadır.	Document Review, Employee interviews
Wage & Benefits No: 5 (2)	Transprotation is provided free of charge to all employees. Servis tüm çalışanlar için ücretsiz sağlanmaktadır.	Document Review, Employee interviews



# Confirmation

If actual signatures are not possible in electronic versions, please state the name of the signatory in applicable boxes, as indicating the signature. Please sign this document confirming that the above findings have been discussed with and understood by you: (site management) C: Please indicate below if you, the site management, dispute any of the findings. No need to complete D-E, if no disputes. Title General coordinator Title Senior Lead Auditor Date 29-30.06.2020 Date 29-30.06.2020 Ms. Zeynep AKGUN Mr. Fatih TEKER D: I dispute the following numbered non-compliances: A: Site Representative Signature: B: Auditor Signature:

E: Signed: (If <u>any</u> entry in box D, please complete a signature on this line)

Date

Title

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 reoccurring.

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

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

# Some examples of finding a "root cause"

### Example 1

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

#### Example 2

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

### Example 3

A site uses fines to control unacceptable behaviour of workers.

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

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

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

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

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

DIL TEKSTIL SAN TIC. LTD. STI. Haikalı Merkez Maha Dereboyu Cad. Çalışkan Sk. No:1 K.Çekmece / İST. Haikalı V.D.: 296 040 2624

Date: 29-30.06.2020





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:

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5Iw\_3d\_3d

Click here for Supplier (B) members:

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY\_2brg\_3d\_3d

Click here for Auditors:

https://www.surveymonkey.co.uk/r/BRTVCKP

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Tel: +44 (0)20 7902 2320

VAT Registration No: GB 266455185



### **VAT INVOICE**

DIL TEKSTIL SAN TIC LTD STI halkal# merkez mah.dereboyu cad.çal##kan sokak no:1 k:4 küçükçekmece 34303 istanbul TR	Invoice Number Invoice / TAX Date	ZP410927308 30/06/2020
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Details	Quantity	Net Amount
Subscription for 1 sites for 1 years	1 X 1	100.00
Administration Fee		2.95
Total Net Amount	GBP	102.95
VAT	GBP	0.00
Invoice Total	GBP	102.95

Payment method: Worldpay

www.sedexglobal.com

Email: helpdesk@sedexglobal.com

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