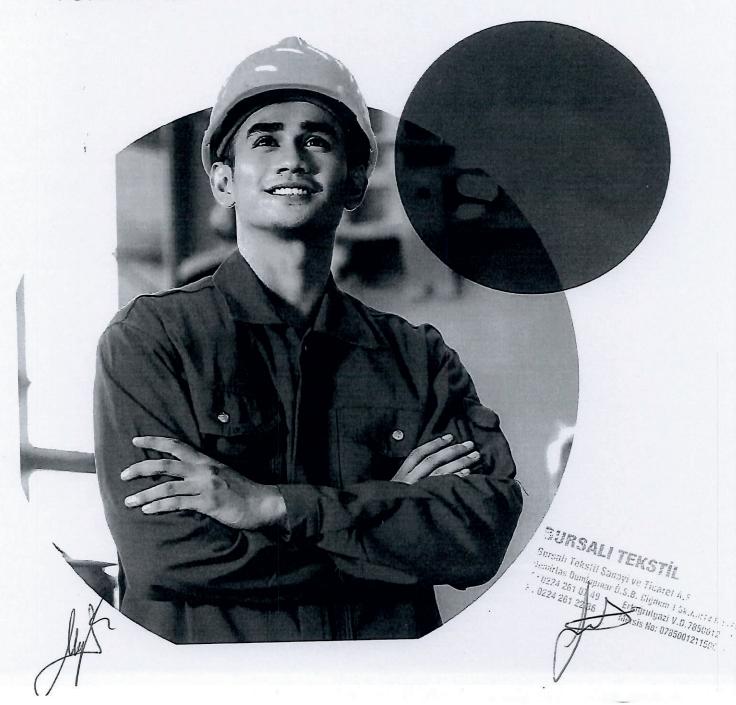


SMETA Corrective Action Plan Report (CAPR)

Version 6.0





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				Aud	it Details				
Sedex Company Reference: (only available on System)		20.1020070		Sedex Site Reference: (only available on Sedex System)		ZS: 106	39719		
Business name (Company nam	e):	BURSALI TEKSTIL SANAYI VE							
Site name:		BURSALI TEKSTIL SANAYI VE			VE TICARET A	.S.	1		
Site address: (Please include fu address)	II .	DEMIRTAS ORG. SAN. BOLG. CIGDEM 1 SK. NO:14 OSMANGAZI / BURSA		Country:	Country:		TURKEY		
Site contact and job title: SELIN KAVAS – SOCIAL CO			COMPLIANCE	SPECIALIST					
Site phone:		00 90 224 3	261 07 49	7	Site e-mail:	te e-mail:		selin.kavas@bursalitekstil.com	
SMETA Audit Typ	e Pillars:	□ Labour □ He Standards Safety		Health & ety	☐ Enviror	nment	☐ Busir	ness Ethics	
Date of Audit: 18&19.12.2018									
Audi		ny Name & L	ogo:		BUR	SALI TEKS	TIL SAN		: CARET A.S.
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Commercial			Purchas	071000		SUBSECTION OF STREET	Retaile		
				Trade I	Inion				

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Commercial		Purchaser		Retailer	
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Multi– stakeholder			Combined	Audit (select all that ap	,D())

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Audit company: Intertek

Report reference. AU133449

Date: 18&19.12.2018



Audit Content:

- (1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.0 April 2017 was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.
- (2) The audit scope was against the following reference documents

2-Pillar SMETA Audit

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

4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)
- (3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non compliances on both the audit report, CAPR and on Sedex.
- (4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

Jux.

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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):

NONE

Auditor Team (s) (please list all including all

interviewers):

Lead auditor:

Team auditor:

Interviewers:

Report writer:

Report reviewer:
Audit Company Report Reference:

Date of declaration:

SERAP TUMEN MELTEM OZKARA

SERAP TUMEN & MELTEM OZKARA

SERAP TUMEN

CEREN GULDALI

AU133449

19.12.2018

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.

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Audit Parameters

	Audit Parameters				
:: Time in and time out	Day 1 Time in: 09:00 Day 1 Time out: 17:00	Day 1 Time out: 17:00 Day 2 Time out: 17:00 Day 3 Time out:			
s: Number of auditor days used:	2 auditors / denetci x 2 days/gun				
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: Window detail: 4 weeks/hafta ☐ Unannounced				
E: Was the Sedex SAQ available for review?	∑ Yes □ No If No, why not				
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	☐ Yes ☐ No If Yes , please capture detail in appropriate audit by clause				
G: Who signed and agreed CAPR (Name and job title)	SELIN KAVAS – SOCIAL COMPLIANCE SPECIALIST / SOSYAL UYGUNLUK UZMANI				
H: Is further information available (if yes, please contact audit company for details)	☐ Yes ☑ No				
I: Previous audit date:	22&23&24.01.2018				
J: Previous audit type:	Periodic / Periyodik				
K: Were any previous audits reviewed for this audit	⊠ Yes □ No □ N/	'A			
Audit attendance	Management	Worker Representativ	res		
	Senior management	Worker Committee representatives	Union representatives		
A: Present at the opening meeting?	⊠ Yes □ No	☐ Yes ⊠ No	☐ Yes ⊠ No		
B: Present at the audit?	⊠ Yes □ No	.□ Yes ⊠ No	☐ Yes ☒ No		
C: Present at the closing meeting?	⊠ Yes □ No	☐ Yes ☐ No.	Yes No orden 1 Sk circle 1 Sahay No orden 1 Sk chugugar 3.3.2 tuguga 1921 chugugar 3.3.2 tuguga 1921 chugugar 3.3.2 tuguga 1921		
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Audit company: Intertek

Report reference. AU133449

Date: 18&19.12.2018



D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	There is no worker committee, but there were worker representatives and interviewed with two of them.
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	There was no unionisation activity in the company.

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 non-compliance and whether a system change is necessary to ensure the issue will not arise again in the future.

See SMETA BPG Chapter 7 'Audit Execution' for more explanation of "root cause".

Next Steps:

- 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 <u>www.sedexglobal.com</u>.
- 2. Sites shall action its non-compliances and document its progress via Sedex.
- Once the site has effectively progressed through its actions then it shall request via Sedex that the audit body verify its actions. Please visit <u>www.sedexglobal.com</u> web site for information on how to do this.
- 4. The audit body shall verify corrective actions taken by the site by either a "Desk-Top" review process via Sedex or by Follow-up Audit (see point 5).
- 5. Some non-compliances that cannot be closed off by "Desk-Top" review may need to be closed off via a "1 Day Follow Up Audit" charged at normal fee rates. If this is the case then the site will be notified after its submission of documentary evidence relating to that non-compliance. Any follow-up audit must take place within twelve months of the initial audit and the information from the initial audit must be available for sign off of corrective action.
- 6. For changes to wages and hours to be correctly verified it will normally require a follow up site visit.

 Auditors will generally require to see a minimum of two months wages and hours records, showing new rates in order to confirm changes (note some clients may ask for a longer period, if in doubt please check with the client).

Audit company: Intertek

Report reference. AU133449

Date: 18&19.12.2018



SMETA: Sedex Audit Reference: 2018TRZAA405794882 SMETA Corrective Action Plan Report (CAPR) Version 6.0

Corrective Action Plan

		Sea ruge your plant to be a		re Action Plan – no	NAME OF TAXABLE PARTY.			Verification Evidence	Status
Non- Compliance Number The reference number of the non- compliance from the Audit Report, for example, Discrimination	New or Carried Over is this a new non- compliance identified at the follow-up or one carried over (C) that is still outstanding	Details of Non- Compilance Details of Non-Compliance	Root cause (completed by the site)	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 auditor)	Timescale (Immediate, 30, 60, 90,180,365)	Verification Method Desktop / • Follow-Up [D/F]	Agreed by Management and Name of Responsible Person: Note if management agree to the non- compliance, and document name of responsible person	and Comments Details on corrective action evidence	Open/Closed or comment
N/A	N/A	Denetim süreci dahilinde herhangi bir eksikliğe rastlanmamıştır. No non-compliance was noted during the whole audit process	☐ Training ☐ Systems ☐ Costs ☐ lack of workers ☐ Other – please give details:	N/	N/A	N/A	N/A		

		All and the state of the last of the second	- Observations	sellens discussed
Observation Number The reference number of the observation from the Audit Report, for example, Discrimination No.7	New or Carried Over Is this a new observation identified at the follow-up or one carried over (C) that is still outstanding	Details of Observation Details of Observation	Root cause (completed by the site)	Any Improvement actions discussed (Not uploaded on to SEDEX)
		NONE / YOKTUR		

Audit company: Intertek

Report reference. AU133449

Date: 18&19.12.2018







SMETA: Sedex Audit Reference: 2018TRZAA405794882 SMETA Corrective Action Plan Report (CAPR) Version 6.0

	Good examples	
Good example Number The reference number of the non-compliance from the Audit Report.	Details of good example noted	Any relevant Evidence and Comments
for example, Discrimination No.7 5. Yaşam Ücreti ve Yan Haklar / Living	Meal is provided free of charge to all employees.	Employee interview, document review
Wages and Benefits	Yemek tum calisanlara ucretsiz saglanmaktadir.	Calisan gorusmesi, dokuman inceleme
(1) 5. Yaşam Ücreti ve Yan Haklar / Living	Transportation is provided free of charge to all employees.	Employee interview, document review
Wages and Benefits (2)	Servis tum calisanlara ucretsiz saglanmaktadir.	Calisan gorusmesi, dokuman incelem
5. Yaşam Ücreti ve Yan Haklar / Living	Supermarket cards (equals to 100tl) were given to all workers in every 4 months in a year.	Employee interview, document review
Wages and Benefits (3)	Tüm çalışanlara, yılda her 4 ayda bir supermarket kartı (100TL lik) verilmektedir.	Calisan gorusmesi, dokuman incelem
5. Yaşam Ücreti ve Yan Haklar / Living Wages and Benefits	Gift checks (valid in contracted stores or supermarkets) were given to workers who gave suggestions regarding social and quality issues.	Employee interview, document revie Calisan gorusmesi, dokuman incelen
(4)	Sosyal ve kalite konularında öneri veren çalışarılara hediye cekleri (anlaşmalı magaza ve supermarketlerde geçerli olan) verilmektedir.	Calisari gorusmesi, aokomani ilicelo.

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Muylnar O.S.B. Gledem 1 Sk. No.:14 BHRS 6

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Mersis No.: 07850012115005

Audit company; Intertek

Report reference. AU133449

Date: 18&19.12.2018



SMETA: Sedex Audit Reference: 2018TRZAA405794882 SMETA Corrective Action Plan Report (CAPR) Version 6.0

Confirmation

actual signatures are not possible in ele-	t the above findings have been discussed with ctronic versions, please state the name of the s	anatory in applicable boxes, as indicating the signature. This SOCIAL COMPLIANCE SPECIALIST / SOSYAL UYGUNLUK UZMANI
A: Site Representative Signature:	SELIN KAVAS	IMIE SOCIAL COMILEIANOLA SOCIAL
	The state of the s	Date 19.12.2018
3: Auditor Signature:	SERAP TUMEN	Title LEAD AUDITOR / BAS DENETCI
	MELTEM OZKARA	AUDITOR / DENETCI
		Date 19.12.2018
C: Please indicate below if you, the site	management, dispute any of the findings. No no	eed to complete D-E, if no disputes.
D: I dispute the following numbered non	i-compliances. NON2	
E: Signed:	N/A	Title N/A
(If <u>any</u> entry in box D, please complete a signature on this line)		Date

Audit company: Intertek

Report reference. AU133449

Date: 18&19.12.2018





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 noncompliance 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"

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.

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.

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 j issues raised and Cigdon T SK, No. 74 RIRSA Ethikalasi 194.9015175 No. 058200454200055 the actions to be taken.

udit company: Intertek

Report reference. AU133449

Date: 18&19.12.2018



Disclaimer for CAP (please insert after 'Guidance on Root Cause' section in the CAP Report): DISCLAIMER:

"This report is for the exclusive use of the client of Intertek named in this report ("Client") and is provided pursuant to an agreement for services between Intertek and Client ("Client Agreement"). This report provides a summary of the findings and other applicable information found/gathered during the audit conducted at the specified facilities on the specified date only. Therefore, this report does not cover, and Intertek accepts no responsibility for, other locations that may be used in the supply chain of the relevant product or service. Further, as the audit process used by Intertek is a sampling exercise only, Intertek accepts no responsibility for any non-compliant issues that may be revealed relating to the operations of the identified facility at any other date. Intertek's responsibility and liability are also limited in accordance to the terms and conditions of the Client Agreement. Intertek assumes no liability to any party, for any loss, expense or damage occasioned by the use of this information other than to the Client and in accordance with the Client Agreement and these disclaimers. The disclaimer should be read in conjunction with the Terms and Conditions of Intertek."



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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

Date: 18&19.12.2018

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