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|-------------------------------------------------------------------------|----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|
| Monitored Party Kamer Giyim Sanayi ve Ticaret Limited Şirketi | amfori ID 792-000082-000 | Address FATİH CAD. YUKSEK SOKAK NO:5 KAT:1-2-3 MERTER GUNGOREN, İstanbul, İstanbul, Türkiye |
| Monitoring Activity amfori Social Audit - Manufacturing | Monitoring Type Full Monitoring | Monitoring Partner Intertek |
| Monitoring Start Date 12/09/2023 | Closing Meeting Finished Date 13/09/2023 | Submission Date 25/09/2023 |
| Expiration Date 25/09/2024 | Announcement Type Semi Announced | |
| Site Kamer Giyim San. ve Tic. Ltd. Sti. | Site amfori ID 792-000082-002 | |

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OVERALL RATING



SECTION RATING

| | | |
|----------------------------------------------------------------------|---|--|
| PA1: Social Management System | D | |
| PA 2: Workers Involvement and Protection | A | |
| PA 3: The Rights of Freedom of Association and Collective Bargaining | A | |
| PA 4: No Discrimination | A | |
| PA 5: Fair Remuneration | B | |
| PA 6: Decent Working Hours | A | |

| | | |
|--------------------------------------------|---|-------------------------------------------------------------------------------------|
| PA 7: Occupational Health and Safety | A |  |
| PA 8: No Child Labour | A |  |
| PA 9: Special Protection for Young Workers | A |  |
| PA 10: No Precarious Employment | A |  |
| PA 11: No Bonded Labour | A |  |
| PA 12: Protection of the Environment | A |  |
| PA 13: Ethical Business Behaviour | A |  |

GENERAL DESCRIPTION

The third-party (Auditing Company) Name: Intertek Test Hizmetleri A.S. / The audit was conducted by 2 auditors. (1 of them is a trainee auditor.)

GIZEM OZTURK - The lead auditor - APSCA No: CSCA 21700502

HUSEYIN YILDIRIM - The trainee auditor - APSCA No: CSCA 21704529

The duration of the audit: 12.09.2023

KAMER GIYIM was established in 1984 and they have operated in this building since 1992.

The facility has a valid opening and operating permit (business license).

They produce knitted outwear garments. There are cutting, sample ironing and sample sewing, packing & ironing processes available. The sewing process is subcontracted.

The building is made of concrete. The total area of the facility is 2100 square meters. A dormitory is not available in the facility.

The layout is as follows:

3th floor: Lunch hall

2nd floor: Ironing & packing, fabric showroom

1st floor: Offices, sample sewing, sample ironing and cutting

Entrance: Cutting

-1 Floor: Other firm

Annual production capacity: 220000 piece

The total employee number in the facility is 19. (8 male, 11 female)

Administrative: 13, Production: 5, Lunch hall:1

There are no service providers, no piece rate workers, no daily worker, no child, no young, disable, in probation period, maternity leave, pregnant, migrant, and breastfeeding employees in the auditee.

The youngest worker is 21 years old.

There is no union at the facility. There are 2 worker representatives at the facility with the free election.

The factory has a face recording time record system.

Regular working hours in the company were as below for administrative and production workers;

08:00-18:30 x 5 days a week with 1 hour 30 minutes break

Wages are paid between 5th day of each month via bank.

The auditee has at least 12 months of time and wage records.

The payment and time records of 5 employees were reviewed for August 2023 (last paid month), June 2023 (nonpeak month), and December 2022 (peak).

(There are a total of 5 production employees in the business. However, since 3 employees were on annual leave on the audit day, only 2 production employees could be interviewed. However, in the time and payment record sample, the review was provided for all 5 employees.)

The highest and average wages for reviewed months;

August 2023: 13860 TL / 12580

June 2023: 10380 TL / 9620 TL

December 2022: 7830 TL / 6960 TL

Meal and transportation are provided free of charge to all employees.

The noncompliances found in the report;

PA1: The responsibilities and job descriptions of the team in the social compliance organizational chart and evaluation

system (audit) for subcontractors and service providers.

PA2: In case of a complaint for the person responsible for the complaint mechanism in the business; There is no procedure on how to proceed.

PA5: living wage calculation and calculation of severance pay, wage calculation system of the company and meal-transportation fee in the calculation of severance pay.

PA8: written procedures about protection in case children are found.

PA13: Missing information in the anti-bribery policy procedure.

AUDITOR NOTES:

* Those documents below were not uploaded into the system due to the fact that they were not applicable: Agency labor contract / Government waivers / Union or CBA / Dormitory / High risky area/inconsistency between time & production records/ Service provider contract

* The fair remuneration table in the audit report was filed by the auditor according to GLWC.

* The reason why the total workforce number of the auditee was different from the number of the workforce who came to the auditee on the audit day was the absent workers - sick report during the audit day.

* All names and surnames of the outsourced persons and blue-collared employees due to the practice of protection of personal data are noted with *** in the report.

* Report is proofread in general. A spelling check has been done and corrected for report quality.

* An additional 0.5 days more than the minimum man-day is assigned for onsite auditing. The auditor is provided with 0.5 day reporting time.

* There was no special circumstance during the audit.

* "Speak for change" poster was hung in the company.

* The last payment month is August 2023. However, the social insurance process for the relevant month has not yet been formed legally. Therefore, the social insurance document for July 2023 was added instead of August 2023.

* During the report control process, the 1st finding in question PA5.5 was moved to question PA.5.2.

SITE DETAILS

Site
Kamer Giyim San. ve Tic. Ltd. Sti.

Site amfori ID
792-000082-002

GICS Classification

| | | |
|--------------------------|------------------------------------------|--------------------------|
| Sector | Industry Group | Industry |
| Consumer Staples | Household & Personal Products | Personal Products |
| Sub Industry | | |
| Personal Products | | |

amfori Process Classifications

N.A.

GS1 Classifications

N.A.

NACE Classification

N.A.

Water Stress Situation

N.A.

METRICS

Key Metrics

| | | |
|-----------------------------------------------|-----------|---------|
| Total workforce | 11 | Workers |
| Legal minimum wage in local currency | 11.402,32 | Monthly |
| Lowest wage paid for regular work at the site | 11.402,32 | Monthly |
| Calculated living wage in local currency | 19.336,36 | Monthly |
| Total sample | 2 | Workers |

Other Metrics

| | | |
|------------------------------------|----|---------|
| Male workers | 6 | Workers |
| Female workers | 5 | Workers |
| Permanent workers - Male | 8 | Workers |
| Permanent workers - Female | 11 | Workers |
| Temporary workers - Male | 0 | Workers |
| Temporary workers - Female | 0 | Workers |
| Seasonal workers - Male | 0 | Workers |
| Seasonal workers - Female | 0 | Workers |
| Management - Male | 4 | Workers |
| Management - Female | 9 | Workers |
| Apprentices - Male | 0 | Workers |
| Apprentices - Female | 0 | Workers |
| Workers on probation - Male | 0 | Workers |
| Workers on probation - Female | 0 | Workers |
| Workers with night shift - Male | 0 | Workers |
| Workers with night shift - Female | 0 | Workers |
| Workers with disabilities - Male | 0 | Workers |
| Workers with disabilities - Female | 0 | Workers |
| Domestic migrant workers - Male | 0 | Workers |
| Domestic migrant workers - Female | 0 | Workers |
| Foreign migrant workers - Male | 0 | Workers |
| Foreign migrant workers - Female | 0 | Workers |
| Workers hired directly - Male | 8 | Workers |
| Workers hired directly - Female | 11 | Workers |
| Workers hired indirectly - Male | 0 | Workers |
| Workers hired indirectly - Female | 0 | Workers |
| Unionised workers - Male | 0 | Workers |
| Unionised workers - Female | 0 | Workers |
| Workers under CBA - Male | 0 | Workers |
| Workers under CBA - Female | 0 | Workers |
| Pregnant workers | 0 | Workers |

| | | |
|------------------------------------|---|---------|
| Workers on parental leave - Male | 0 | Workers |
| Workers on parental leave - Female | 0 | Workers |
| Sample - Male | 1 | Workers |
| Sample - Female | 1 | Workers |

FINDINGS



PA1: Social Management System

Site: Kamer Giyim San. ve Tic. Ltd. Sti. | Site amfori ID: 792-000082-002

Question: 1.1 Is there satisfactory evidence that the auditee has set up an effective management system to implement the amfori BSCI Code of Conduct?

ENGLISH

LOCAL LANGUAGE

Finding

amfori BSCI Code of Conduct, Principle on Social Management System

The facility should have an efficient management system to BSCI values are implemented.

FINDING:

The facility has a social compliance management system however there are gaps identified to be improved. Please refer to issues that need to be corrected in PA 1, PA2, PA 5, PA 8 & PA 13.

This question is rated partially because there is a management system.

amfori BSCI Davranış Kuralı, Sosyal Yönetim Sistemi Prensibi

BULGU:

İşletmede bir sosyal uygunluk yönetim sistemi mevcuttur ancak sistemde iyileştirmesi gereken noktalar not edilmiştir. Lütfen PA 1, PA2, PA 5, PA 8 & PA 13'de düzeltilmesi gereken konulara bakınız.

Bu soru işletmede bir yönetim sistemi mevcut olduğu için kısmi cevaplanmıştır.

Question: 1.2 Is there satisfactory evidence that a senior manager has been appointed to ensure that the values and principles of amfori BSCI are followed in a satisfactory manner?

ENGLISH

LOCAL LANGUAGE

Finding

Amfori BSCI Code of Conduct, Principle on Social Management System

A senior manager should be appointed to ensure that the BSCI values and principles are followed in a satisfactory manner.

Finding: According to the management interview and document review, The responsibilities and job descriptions of the team in the social compliance organizational chart are not documented.

This question was answered as partially because there is BSCI responsible at the facility.

Amfori BSCI Davranış Kuralı, Sosyal Yönetim Sistemi Prensibi

Bulgu: Gerçekleştirilen yönetim görüşmesi ve doküman incelemesine göre, Sosyal uygunluk organizasyon şemasındaki ekibin görev tanımları ve sorumluluklarına dair yazılı döküman mevcut değildir.

Bu soru kısmen cevaplanmıştır çünkü işletmede BSCI sorumlusu bulunmaktadır.

Question: 1.3 Is there satisfactory evidence that the auditee has a good overview of the significant business partners and their level of alignment with the amfori BSCI Code of Conduct?

ENGLISH

LOCAL LANGUAGE

Finding

Amfori BSCI Code of Conduct, Principle on Social Management System

There should be satisfactory evidence that the auditee has a good overview of the significant business partners and their level of alignment with the BSCI Code of Conduct.

Finding:

According to the management interview and document review,

-There is an evaluation system (audit) for subcontractors and service providers. There is no evidence of inspections and evaluations. The evaluations are not effective enough. In addition, the social compliance criterion scoring in the evaluation is not detailed. Zero tolerance items are not specified in the audit questions and their impact on scoring cannot be understood.

-Review meetings are not held to evaluate subcontractors and service providers in terms of social compliance.

This question was answered partially because there is an evaluation system for contractors.

Amfori BSCI Davranış Kuralı, Sosyal Yönetim Sistemi Prensibi

Bulgu: Gerçekleştirilen yönetim görüşmesi ve doküman incelemesine göre,

-Taşeron ve hizmet sağlayıcılar için bir değerlendirme sistemi (denetim) vardır.

Denetimlere ve değerlendirmelere ait herhangi bir kanıt mevcut değildir. Yapılan değerlendirmeler yeterince efektif değildir. Ayrıca değerlendirmede sosyal uygunluk kriteri puanlaması detaylı değildir. Zero tolerance maddeler denetim sorularında belirtilmemiştir ve puanlamaya etkisi anlaşılamamaktadır.

-Taşeronların ve hizmet sağlayıcıların sosyal uygunluk açısından değerlendirmesine yönelik gözden geçirme toplantıları yapılmamaktadır.

Bu soru tedarikçi değerlendirmeler yapıldığından kısmen olarak cevaplanmıştır.

PA 2: Workers Involvement and Protection

Site: Kamer Giyim San. ve Tic. Ltd. Sti. | Site amfori ID: 792-000082-002

Question: 2.5 Is there satisfactory evidence that the auditee has established, or participates in, an effective operational-level grievance mechanism for individuals and communities?

ENGLISH

LOCAL LANGUAGE

Finding

Amfori BSCI Code of Conduct, Principle on Workers Involvement and Protection
Auditee should establish, or participate in, an effective operational-level grievance mechanism for individuals and communities.

Finding: Based on the document review and management interviews conducted in the company, In case of a complaint for the person responsible for the complaint mechanism in the business; There is no procedure on how to proceed.

This question was answered partially because there are suggestion boxes at the facility.

Amfori BSCI Davranış Kuralı, Çalışanların Süreçlere Dâhil Edilmesi ve Korunması Prensibi

Bulgu: Firmada gerçekleştirilen döküman incelemesi, ve yönetim görüşmesine dayalı olarak; İşletmede şikayet mekanizmasından sorumlu kişi için bir şikayet olması durumunda; nasıl bir yol izleneceğine dair prosedür bulunmamaktadır.

İşletmede dilek şikayet kutusu bulunduğundan kısmen cevaplanmıştır.

PA 5: Fair Remuneration

Site: Kamer Giyim San. ve Tic. Ltd. Sti. | Site amfori ID: 792-000082-002

Question: 5.2 Is there satisfactory evidence that wages are paid in a timely manner; regularly and fully in legal tender?

ENGLISH

LOCAL LANGUAGE

Finding

LAW: In accordance with Turkish Labour Law # 4857 / 2003, ARTICLE 41, overtime is permitted for reasons such as national interests, or the basic requirements of the work or increase of production. Overtime is defined in the Law as the working hours that exceed forty-five working hours in a week. In cases where the reconciliation principle is applied, no overtime is considered even if the average weekly working hours exceed a total of forty-five hours in certain weeks provided that the normal weekly working period is maintained. The overtime pay per hour is calculated by increasing the normal hourly wage at the rate of fifty percent.

FINDING: Based on the document review and employee and management interviews, in the payroll calculation system of the company, in the fractional payments done to the employees, missing payments such as 5 TL-10 TL are observed in the payments as the system does not convert from hourly calculation to numerical calculation. For example, 0.3 hours are paid for 00:30 minutes instead of half an hour.

This question has been partially answered because all other payments of the business are made in accordance with the law.

1)KANUN: TÜRK İŞ KANUNU # 4857 / 2003, Madde 41

BULGU: Döküman incelemesi, çalışan ve yönetim görüşmesine istinaden, işletmede maaş bordro hesaplama sisteminde, çalışanların dakika olarak yapılan küsürat ödemelerinde; sistem, saatlik hesaplamadan numerik hesaplamaya geçmediğinden, ödemelerde 5-10 TL gibi eksik ödemeler görülmektedir. Örneğin, 00: 30 dakika için yarım saat yerine 0,3 saat ödenme yapılmıştır.

Bu soru kısmen olarak cevaplanmıştır, çünkü işletmenin diğer tüm ödemeleri kanuna uygun şekilde yapılmaktadır.

Question: 5.4 Is there satisfactory evidence that the auditee provides sufficient remuneration that allows workers to meet a decent standard of living?

ENGLISH

LOCAL LANGUAGE

Finding

Amfori BSCI Code of Conduct, Fair Remuneration Principle

FINDING: According to the document review and employee & management interview, a living wage calculation is available in the facility. However,

Amfori BSCI Davranış Kuralı, Adil Ücretlendirme Prensibi

BULGU: Gerçekleştirilen doküman incelemesi ve çalışan&yönetim görüşmesine göre, İşletmede bir yaşam ücreti hesaplaması mevcuttur. Ancak

Finding

there are areas for improvement;
-There are blank fields in the data in the surveys received from employees. (For example, accumulation and unexpected events)

This question has been partially answered because the business has a living wage study.

iyileştirmeye açık noktalar mevcuttur;
-Çalışanlardan alınan anketlerdeki verilerde boş bırakılan alanlar vardır. (Örneğin, birikim ve beklenmedik olaylar)

Bu soru kısmen olarak cevaplanmıştır, çünkü işletmenin bir yaşam ücreti çalışması mevcuttur.

Question: 5.5 Is there satisfactory evidence that the auditee provides workers with the social benefits that are legally granted?

ENGLISH

LOCAL LANGUAGE

Finding

LAW: Turkish Labor Law # 4857 / 22.5.2003, Repealed provisions; Article 120: Other articles were repealed except for the 14th article of the Labor Law dated 25.8.1971 and numbered 1475.Turkish Labor Law # 1475 / 25.8.1971, Article 14, (Changes on 29/7/1983 – 2869/3. Art): In the calculation of the compensation mentioned in Article 13 and the wage that will be the basis for the severance pay in this article, the money provided to the worker and the benefits arising from the contract and law that can be measured in money are also taken into consideration.

FINDING: According to the management interview and document review, The meal and transportation fee is not included in the calculation of severance pay in the facility.

This question has been partially answered because all other payments of the business are made in accordance with the law.

KANUN: Türk İş Kanunu #4857 / 22.5.2003, Yürürlükten kaldırılan hükümler Madde 120: 25.8.1971 tarihli ve 1475 sayılı İş Kanununun 14 üncü maddesi hariç diğer maddeleri yürürlükten kaldırılmıştır.

Türk İş Kanunu #1475 / 25.8.1971, Madde 14, (Değişik : 29/7/1983 – 2869/3 md.): 13

BULGU: İşletmede gerçekleştirilen yönetim görüşmesine göre, İşletmede kıdem-tazminat hesaplamasında yemek-yol ücreti dahil edilmemektedir.

Bu soru kısmen olarak cevaplanmıştır, çünkü işletmenin diğer tüm ödemeleri kanuna uygun şekilde yapılmaktadır.

PA 8: No Child Labour

Site: Kamer Giyim San. ve Tic. Ltd. Sti. | Site amfori ID: 792-000082-002

Question: 8.4 Is there satisfactory evidence that the auditee has adequate and remedial policies and procedures to provide for further protection in case children are found to be working?

ENGLISH

LOCAL LANGUAGE

Finding

Amfori BSCI Code of Conduct, Principle on No Child Labour, Auditee should have satisfactory evidence that he auditee has adequate and remedial policies and procedures to provide for further protection in case children are found to be working.

FINDING: According to the management interview and document review, there is a procedure regarding child labor in the facility. However, in this procedure, if there are child workers working in the facility; There are no steps on how to proceed.

This question has been rated as partially because the factory has a "no child labor" policy.

Amfori BSCI Davranış Kuralı, Çocuk İşçiliğini Önleme Prensibi

BULGU: Gerçekleştirilen yönetim görüşmesi ve doküman incelemesine göre, İşletmede çocuk işçilik ile ilgili bir prosedür mevcuttur. Ancak bu prosedürde, işletmede çalışan çocuk işçi bulunması durumunda; nasıl bir yol izleneceğine dair adımlar yer almamaktadır.

Bu soru çocuk işçi çalıştırılmamasına ilişkin politika mevcut olduğu için kısmen şekilde skorlanmıştır.

PA 13: Ethical Business Behaviour

Site: Kamer Giyim San. ve Tic. Ltd. Sti. | Site amfori ID: 792-000082-002

Question: 13.1 Is there satisfactory evidence that the auditee actively opposes any act of corruption, extortion or embezzlement, or any form of bribery in its activities as a business enterprise?

ENGLISH

LOCAL LANGUAGE

Finding

Amfori BSCI Code of Conduct, Principle on Ethical Business Behaviour

Auditee should actively oppose any act of corruption, extortion embezzlement, or any form of bribery in its activities as a business enterprise.

Finding: According to the document review and management interview, the facility has an anti-bribery policy. However,

-There is no information in the procedure about how employees will proceed in case of encountering or witnessing bribery in the business.
- Situations that will or will not be considered "bribery" are not clearly stated in the current policy.

This question was answered partially because there is anti-bribery policy at the facility.

Amfori BSCI Davranış Kuralı, Etik Davranışlar Prensibi

Bulgu: Gerçekleştirilen doküman incelemesi ve yönetim görüşmesine göre, İşletmede bir anti rüşvet politikası mevcuttur. Ancak, -İşletmede rüşvetle karşılaşılması ve ya rüşvete tanık olunması durumunda çalışanların nasıl bir yol izleyeceğine dair bilgi prosedürde yer almamaktadır.

-Mevcut politika içerisinde "rüşvet" sayılacak veya sayılmayacak durumlar net bir şekilde belirtilmemiştir.

Bu soru işletmede anti-rüşvet politikası bulunduğundan kısmen cevaplanmıştır.