

Monitored Party <b>EGEM TEKSTİL KONFEKSİYON SAN. VE TİC.LTD.ŞTİ.</b>	amfori ID <b>792-000985-000</b>	Address <b>BOZBURUN MAHALLESİ 7045 SOKAK NO:28 MERKEZEFENDİ , 20020 Denizli, Denizli, Türkiye</b>
Monitoring Activity <b>amfori Social Audit - Manufacturing</b>	Monitoring Type <b>Full Monitoring</b>	Monitoring Partner <b>Intertek</b>
Monitoring Start Date <b>31/10/2023</b>	Closing Meeting Finished Date <b>11/11/2023</b>	Submission Date <b>11/11/2023</b>
Expiration Date <b>11/11/2025</b>	Announcement Type <b>Semi Announced</b>	
Site <b>EGEM TEKSTİL KONF. SAN. TİC. LTD. ŞTİ.</b>	Site amfori ID <b>792-000985-002</b>	

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## OVERALL RATING



## SECTION RATING

PA1: Social Management System	<b>B</b>	
PA 2: Workers Involvement and Protection	<b>B</b>	
PA 3: The Rights of Freedom of Association and Collective Bargaining	<b>A</b>	
PA 4: No Discrimination, Violence or Harassment	<b>B</b>	
PA 5: Fair Remuneration	<b>A</b>	
PA 6: Decent Working Hours	<b>A</b>	

PA 7: Occupational Health and Safety	<b>A</b>	
PA 8: No Child Labour	<b>A</b>	
PA 9: Special Protection for Young Workers	<b>A</b>	
PA 10: No Precarious Employment	<b>A</b>	
PA 11: No Bonded, Forced Labour or Human Trafficking	<b>A</b>	
PA 12: Protection of the Environment	<b>A</b>	
PA 13: Ethical Business Behaviour	<b>A</b>	

## GENERAL DESCRIPTION

SEBLA EROGLU - LEAD AUDITOR / INTERTEK / CSCA 21702600 / 30-31.10.2023

EGEM TEKSTİL KONF. SAN. VE TİCA.A.S. was established on 01.01.1999 in Denizli.

The factory building consisted of 1 production building. ( 5890 m2)

The building is made of reinforced concrete. It is not a shared building. There were 2 floors available.

Building layout; Ground Floor: Offices, doctor room, warehouses, weaving section, cutting, lunch hall, and locker rooms

Floor 1; Production Areas ( such as sewing, package ) , Administrative offices and warehouse

The products manufactured at this site are such as bathrobe, towel and home textile.

The company has a current business license to open and operate. (Certificate Date: 28.03.2018-/NO 165; 28.03.2018-/NO 164 )

Employees used electronic time record system. ( fingerprint system)

The youngest employee found was 21 years old.

The regular working hours for regular employees ( except of weaving employees and security employees) and management employees were Monday to Friday from 07:45 a.m. to 06:15 p.m. with two times tea breaks at 10:00 a.m. (30 min.) and at 4:00 p.m. (15 min.) and 60 mins. meal break at: 12:30 p.m. Saturdays and Sundays were granted as weekly rest day. SO at total they worked 42.5 hours in a week.

The regular working hours for weaving employees were Monday to Saturday has 3 shifts; 1st shift 7:00 a.m. to 03:00 p.m. with 30 mins. meal break at: 12:30 p.m. , 2nd Shift 03:00 p.m to 11:00 p.m. with 30 mins. meal break at 08:30 p.m. and 3rd shift 11:00 p.m. to 07:00 a.m. with 30 mins meal break at 04:30 a.m. and Sundays were granted as weekly rest day.

There was a service provider's employees ( such as security) worked in the facility.

The security employees worked from 07:00 to 19:00 and from 19:00 to 07:00 with 1 hour break on a day.( they work 4 days and took 2 days off)

The company stated that they do overtime work from time to time so that the loading of the orders is not delayed.

Overtime work is noted as follows;

March 2023(Randomly month ); Maximum 33 overtime hours/month

July 2023 ( Randomly month); Maximum 40 overtime hours/month

September 2023( Last paid month); Maximum 3 overtime hours/month.

Production processes are weaving, cutting, sewing, packing processes.

Lunch hall and doctor room are also present in the facility.

Payment Day: 10th-15th each month by bank.

No dormitory provided to workers

Good Examples; Food and transportation was provided for free of charge.

There are totally 88 employees. ( 18 office employees ( 11 female 7 male ) , 70 production employee (42 female 28 male ) ). 88+ 3 (security employees) = 91

# of young employees: 0

# of apprentice: 0

# of pregnant employee: 0

# of employees on maternity leave: 1

# of disabled: 0

Peak Months; Not spesific peak season.

Auditor interviewed with at total 12 employees; 7 employees by individually ( 4 male and 3 female) and 5 employees by group ( all female)

12 employees' wage records were reviewed for September 2023 (last paid month), March 2023 (Randomly Month) and July 2023 (Randomly month) were reviewed.

-12 months records were provided for review. (Between October 2022 to September 2023 )

- At least legal minimum wage was paid to all workers.

- There were 3 worker representative in the facility.( elected by employees) .

- The employees informed that their complaints and suggestions are taken into consideration by the managers.

- All workers said they were satisfied with their employment at the factory.

(There was no salary below the minimum wage in the 3-month salary of the 12 people who were examined.)

\*For September 2023, one of the months examined; that reviewed employees took at average 13242,54TL(NET). It was noted that 1 out of the 12 reviewed employee received a maximum of 15274,57 TL (NET)

\*For July 2023, one of the months examined; that reviewed employees took at average 14877,19 TL (NET). It was noted

that 1 out of the 12 reviewed employee received a maximum of 16485,80 (NET)

\*For March 2023, one of the months examined; that reviewed employees took at average 10104,89 TL (NET). It was noted that 1 out of the 12 reviewed employee received a maximum of 11799,74 TL(NET)

Auditor Note regarding documents;

- Those documents below were not uploaded in the system due to the fact that they were not applicable.
- Agency labor contract
- Government waivers
- Collective bargaining agreement
- Dormitory
- Inconsistency between records.

Auditor Note 1: Spelling errors in the report& capar were corrected during the control. Auditor corrected grammar and spelling errors during internal review..

Auditor Note 2: The external persons' ( such as facility doctor, h&s expert...) and blue collared employees' information have been hidden due to the practice of protection of personal data.

Auditor Note 3 :On the fair remuneration table in the remuneration sheet, the areas which were not applicable in Turkey were kept with 0 value.

Auditor Note 4: Additional 0.5 day more than minimum man-day is assigned for onsite auditing. The auditor is provided with 0.5 day reporting time onsite.

Auditor Note 5: Since there are those who are on leave on the day of the audit and those who are on sick leave, the total number and the number of those who were in the factory during the audit are different

Auditor Note 6: Observation about speak for change -BSCI Poster was hung and training were given for grievance mechanism.

Auditor Note 7 :There was no special circumstance during the audit.

Auditor Note 8: Employee representatives did not attend the opening and closing meetings due to their busy schedule.

NON COMPLIANCES NOTED AS BELOW;

PA1;

FINDING 1; Based on the management & employee interview and document review; There is a management system for social compliance, but it has been noted that there are findings that need to be corrected in Performance areas 1,2 ,4 and 5.

PA2;

2.2.- FINDING It was noted that the long-term goals , vision and mission for protecting workers were defined however goals are not measurable, the goal system is not effective, current goals are same as previous years' goals.

2.5.- FINDING: Based on the document review and employee interview; It has been determined that the audited facility does not conduct satisfaction surveys at the specified frequencies regarding the complaint mechanism.

PA4;

4.2 FINDING Based on the document review and employee interview; It has been determined that the audited facility does not conduct satisfaction surveys at the specified frequencies regarding the complaint mechanism.

PA 5

5.5.

FINDING 1: Based on employee & management interview and document review health check fees are paid by the employees at hiring process.

FINDING 2 :Based on employee & management interview and document review; It was noted that the progress payment provided as transportation and meal is not included when calculating the severance allowance of employees who left the company.

FINDING 3: According to the employee and management interviews and document review; It was observed that annual leaves were not used correctly and on time. (For example, it was observed that 16 of 88 employees were entitled to annual leave of 25 days or more. Maximum 64 days were noted for 1 employee.)

## SITE DETAILS

Site  
**EGEM TEKSTİL KONF. SAN. TİC.  
LTD. ŞTİ.**

Site amfori ID  
**792-000985-002**

### GICS Classification

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Sector <b>Industrials</b>	Industry Group <b>Capital Goods</b>	Industry <b>Trading Companies &amp; Distributors</b>
Sub Industry <b>Trading Companies &amp; Distributors</b>		

### amfori Process Classifications

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N.A.

### GS1 Classifications

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N.A.

### NACE Classification

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N.A.

### Water Stress Situation

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N.A.

# METRICS

## Key Metrics

Total workforce	79	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	16.349,71	Monthly
Total sample	12	Workers

## Other Metrics

Male workers	32	Workers
Female workers	47	Workers
Non-binary workers	0	Workers
Permanent workers - Male	38	Workers
Permanent workers - Female	53	Workers
Permanent workers - Non-binary	0	Workers
Temporary workers - Male	0	Workers
Temporary workers - Female	0	Workers
Temporary workers - Non-binary	0	Workers
Seasonal workers - Male	0	Workers
Seasonal workers - Female	0	Workers
Seasonal workers - Non-binary	0	Workers
Management - Male	7	Workers
Management - Female	11	Workers
Management - Non-binary	0	Workers
Apprentices - Male	0	Workers
Apprentices - Female	0	Workers
Apprentices - Non-binary	0	Workers
Workers on probation - Male	3	Workers
Workers on probation - Female	2	Workers
Workers on probation - Non-binary	0	Workers
Workers with night shift - Male	6	Workers
Workers with night shift - Female	10	Workers
Workers with night shift - Non-binary	0	Workers
Workers with disabilities - Male	0	Workers
Workers with disabilities - Female	0	Workers
Workers with disabilities - Non-binary	0	Workers
Domestic migrant workers - Male	0	Workers
Domestic migrant workers - Female	0	Workers
Domestic migrant workers - Non-binary	0	Workers
Foreign migrant workers - Male	0	Workers

Foreign migrant workers - Female	0	Workers
Foreign migrant workers - Non-binary	0	Workers
Workers hired directly - Male	35	Workers
Workers hired directly - Female	53	Workers
Workers hired directly - Non-binary	0	Workers
Workers hired indirectly - Male	3	Workers
Workers hired indirectly - Female	0	Workers
Workers hired indirectly - Non-binary	0	Workers
Unionised workers - Male	0	Workers
Unionised workers - Female	0	Workers
Unionised workers - Non-binary	0	Workers
Workers under CBA - Male	0	Workers
Workers under CBA - Female	0	Workers
Workers under CBA - Non-binary	0	Workers
Pregnant workers	0	Workers
Workers on parental leave - Male	0	Workers
Workers on parental leave - Female	1	Workers
Workers on parental leave - Non-binary	0	Workers
Sample - Male	4	Workers
Sample - Female	8	Workers
Sample - Non-binary	0	Workers

## FINDINGS

### PA1: Social Management System

Site: EGEM TEKSTİL KONF. SAN. TIC. LTD. STİ. | Site amfori ID: 792-000985-002

**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, Social Management System Principle; The facility should have an efficient management system to BSCI values are implemented.  
FINDING 1; Based on the management & employee interview and document review; There is a management system for social compliance, but it has been noted that there are findings that need to be corrected in Performance areas 1,2 ,4 and 5. This question was rated as partially because the other sections were correct.

Amfori BSCI Davranış Kuralları, Sosyal Yönetim Sistemi İlkesi; Tesis, BSCI değerlerinin uygulanabilmesi için etkin bir yönetim sistemine sahip olmalıdır.  
Bulgu 1: Yönetim & çalışan görüşmesine göre ayrıca yapılan doküman incelemesine göre; Sosyal uygunluk ile ilgili bir yönetim sistemi mevcuttur ancak Performans alanı 1,2,4 ve 5 ' de düzeltilmesi gereken bulgular olduğu not edilmiştir.  
Bu soru, diğer bölümlerin uygun olması nedeniyle kısmen olarak puanlanmıştır.

### PA 2: Workers Involvement and Protection

Site: EGEM TEKSTİL KONF. SAN. TIC. LTD. STİ. | Site amfori ID: 792-000985-002

**Question:** 2.2 Is there satisfactory evidence that the auditee defines long-term goals for protecting workers in line with the aspirations of the amfori BSCI Code of Conduct?

#### ENGLISH

#### LOCAL LANGUAGE

#### Finding

Amfori BSCI Code of Conduct, Principle on Workers Involvement and Protection; There should be satisfactory evidence that the auditee defines long-term goals for protecting workers in line with the aspirations of the BSCI Code of Conduct.  
Finding:  
- It was noted that the long-term goals , vision and mission for protecting workers were defined however goals are not measurable, the goal system is not effective, current goals are same as previous years' goals.  
This question was rated as partially because there was a partial goal system.

Amfori BSCI Davranış Kuralları, İşçilerin Katılımı ve Korunması prensibi;  
Bulgu:  
- İşletmede çalışanları korumaya yönelik BSCI Davranış Kuralları uyarınca uzun dönemli hedefler, vizyon ve misyon belirlenmiştir ancak belirlenen hedefler ölçülebilir değildir, etkin değildir, belirlenen hedefler geçmiş yıllarda belirlenen temel hedefler ile aynıdır.  
Bu soru kısmen olarak cevaplanmıştır çünkü kısmi bir hedef sistemi mevcuttur.

**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
<b>Finding</b>	
<p>Amfori BSCI Code of Conduct, Principle on Workers Involvement and Protection</p> <p>FINDING: Based on the document review and employee interview; It has been determined that the audited facility does not conduct satisfaction surveys at the specified frequencies regarding the complaint mechanism.</p> <p>This question was rated as partially because the gaps noted were minor and non-systematical.</p>	<p>Amfori BSCI Davranış Kuralları, İşçilerin Katılımı ve Korunmasına İlişkin İlke</p> <p>BULGU: Yapılan doküman incelemesi ve çalışan görüşmesine göre; denetlenen kurumun , şikâyet mekanizmasıyla ilgili belirlediği sıklıklarda, memnuniyet anketi yapmadığı tespit edilmiştir. Bu soru, belirtilen boşlukların küçük olması ve sistematik olmaması nedeniyle kısmen olarak derecelendirildi.</p>

#### PA 4: No Discrimination, Violence or Harassment

Site: EGEM TEKSTİL KONF. SAN. TIC. LTD. STI. | Site amfori ID: 792-000985-002

**Question:** 4.2 Is there satisfactory evidence that the auditee takes the necessary preventative and/or remedial measures to ensure workers are not disciplined, dismissed, harassed or otherwise discriminated against because of their complaints against infringements of their rights?

ENGLISH	LOCAL LANGUAGE
<b>Finding</b>	
<p>Amfori BSCI Code of Conduct, Principle on Discrimination</p> <p>FINDING: Based on the document review and employee interview; It has been determined that the audited facility does not conduct satisfaction surveys at the specified frequencies regarding the complaint mechanism.</p> <p>This question was rated as partially because the gaps noted were minor and non-systematical.</p>	<p>Amfori BSCI Davranış Kuralları, Ayrımcılık maddesi</p> <p>BULGU: Yapılan doküman incelemesi ve çalışan görüşmesine göre; denetlenen kurumun , şikâyet mekanizmasıyla ilgili belirlediği sıklıklarda, memnuniyet anketi yapmadığı tespit edilmiştir. Bu soru, belirtilen boşlukların küçük olması ve sistematik olmaması nedeniyle kısmen olarak derecelendirildi.</p>

#### PA 5: Fair Remuneration

Site: EGEM TEKSTİL KONF. SAN. TIC. LTD. STI. | Site amfori ID: 792-000985-002

ENGLISH	LOCAL LANGUAGE
<b>Finding</b>	
<p>NON COMPLIANCE 5.5. LAW:1 OCCUPATIONAL HEALTH AND SAFETY LAW#6331(20/6/2012)ARTICLE 15 – (1) The employer does the following:a) Ensures that the employees are subjected to health surveillance, by taking into account the health and safety risks that they would encounter at the workplace;b) In the following</p>	<p>UYGUNSUZLUK 5.5. KANUN:1 İŞ SAĞLIĞI VE GÜVENLİĞİ KANUNU6331(20/6/2012)MADDE 15 – (1) İşveren aşağıdakileri yapar:a) Çalışanların sağlık ve güvenlik risklerini dikkate alarak sağlık gözetimine tabi tutulmasını sağlar b) Aşağıdaki durumlarda çalışanların sağlık kontrollerinin yapıldığını tespit etmelidirler; 1) İşe başladıklarında;</p>

## Finding

cases, they must ascertain that the employees' medical checkups are done 1) When they start the job;

2) When they change their job;

3) When after repeated leaves because of an industrial accident, occupational disease or health issued, they request to return to the job;

4) Throughout the employment, at regular interval as decided by the Ministry according to the qualifications of the employee, the nature of the work and the danger class of the workplace.

(2) Those who will work at hazardous and very hazardous class workplaces will not be allowed to start work until they get a health report verifying that are medically fit for the job.

(3) Medical reports that must be obtained as a requirement under this Law must be obtained at the workplace health and safety unit or from the workplace doctor that works at the joint health and safety unit from which service is procured.

NON COMPLIANCE 5.5 LAW 2: 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

NON COMP.:5.5 LAW :3 In accordance with Turkish Labour Law # 4857 / 2003, ARTICLE 53-Any worker completing the at least one year service period, including the trial period, is granted a paid annual leave. The worker may not waive the right of paid annual leave. The provisions of this Law relating to paid annual leaves may not be applied to the workers employed in seasonal and campaign works less than one year due to their qualifications.

2) İş değiştirdikleri zaman;

3) İş kazası, meslek hastalığı veya sağlık nedeniyle tekrarlanan izinlerden sonra işe geri dönmek istemeleri halinde;

4) Çalıştığı süre boyunca, çalışanın niteliğine, işin niteliğine ve işyerinin tehlike sınıfına göre Bakanlıkça belirlenecek aralıklarla.

(2) Tehlikeli ve çok tehlikeli sınıftaki işyerlerinde çalışacakların, işe sağlık bakımından uygun olduklarını gösteren sağlık raporu alınmadan işe başlamalarına izin verilmez.

(3) Bu Kanuna göre alınması gereken sağlık raporlarının işyeri sağlık ve güvenlik biriminden veya hizmet alınan ortak sağlık ve güvenlik biriminde görev yapan işyeri hekiminden alınması zorunludur.

UYGUNSUZLUK 5.5 KANUN 2: 4857 Sayılı Türk İş Kanunu / 22.5.2003, Yürürlükten kaldırılan hükümler; Madde 120: 25.8.1971 tarih ve 1475 sayılı İş Kanununun 14 üncü maddesi dışındaki diğer maddeleri yürürlükten kaldırılmıştır. 1475/ 25.8.1971 sayılı Türk İş Kanunu, md. 14, (29/7/ 1983 - 2869/3. Madde): 13 üncü maddede belirtilen tazminatın hesaplanmasında

UYGUNSUZLUK 3 KANUN 3:

4857/2003 sayılı Türk İş Kanunu uyarınca MADDE 53-Deneme süresi de dahil olmak üzere en az bir yıllık hizmet süresini tamamlayan işçiye yıllık ücretli izin verilir. İşçi yıllık ücretli izin hakkından vazgeçemez. Bu Kanunun yıllık ücretli izinlere ilişkin hükümleri, nitelikleri nedeniyle bir yıldan az mevsimlik ve kampanya işlerinde çalıştırılan işçilere uygulanmaz.

**Question:** 5.5 Is there satisfactory evidence that the auditee provides workers with the social benefits that are legally granted without negative impact on their pay, level of seniority, position, or promotion prospects?

## ENGLISH

## LOCAL LANGUAGE

### Finding

LAW1: OCCUPATIONAL HEALTH AND SAFETY LAW#6331(20/6/2012)ARTICLE 15 – (1) ( DETAILS NOTED IN SECTION)  
FINDING 1: Based on employee & management

KANUN 1- KANUN DETAYI ASAGIDA "DİGER" BOLUMUNDE YAZILMISTIR.  
6331 Sayılı İŞ SAĞLIĞI VE GÜVENLİĞİ KANUNU(20/6/2012)MADDE 15 – (1) & Adil iş

## Finding

interview and document review health check fees are paid by the employees at hiring process.

LAW 2: Turkish Labor Law # 4857 / 22.5.2003, Repealed provisions; Article 120 ( DETAILS NOTED IN SECTION)

FINDING 2 :Based on employee & management interview and document review; It was noted that the progress payment provided as transportation and meal is not included when calculating the severance allowance of employees who left the company.

LAW 3: In accordance with Turkis( DETAILS NOTED IN SECTION)h

FINDING 3: According to the employee and management interviews and document review; It was observed that annual leaves were not used correctly and on time. (For example, it was observed that 16 of 88 employees were entitled to annual leave of 25 days or more. Maximum 64 days were noted for 1 employee.)

This question was rated as partially because all other benefits were granted properly.

alım için ILO Genel ilkeleri ve operasyonel yönergeleri ve İşe alım ücretleri ile ilgili maliyetlerin tanımına göre; (2),(3),(4),(5)

BULGU 1: Dokuman incelemesi ve çalışan görüşmelerine göre, işe başlangıçta sağlık muayene ücretleri çalışanlar tarafından ödenmektedir.

KANUN 2: KANUN DETAYI ASAGIDA "DİGER" BOLUMUNDE YAZILMISTIR.

BULGU 2: Yapılan çalışan ve yönetim görüşmesi ve evrak incelemesine göre; Firmada işten çıkan personellerin kıdem tazminatı hesaplaması yapılırken yol ve yemek ücreti olarak sağlanan hak edişlerinin dahil edilmediği tespit edilmiştir.

KANUN 3: KANUN DETAYI ASAGIDA "DİGER" BOLUMUNDE YAZILMISTIR.

BULGU 3: Yapılan çalışan ve yönetim görüşmesi ve evrak incelemesine göre; yıllık izinlerin doğru ve zamanında kullanılmadığı görülmüştür. ( Orneğin 88 çalışanın 16'sının 25 gün ve üzerinde yıllık izin hakkı bulunduğu görülmüştür. Maximum 1 çalışanda 64 gün not edilmiştir. )

Bu soru kısmen olarak cevaplanmıştır çünkü diğer hakkeşler uygun şekilde sağlanmaktadır.