

## Declaration of country specific risks Türkiye

### Introduction

In accordance with the OECD Due Diligence Guidance, we perform a regular supply chain risk analysis. In this document we like to share relevant points that have been identified during our risk analysis as topics that are seen as most likely to happen in Türkiye. This is reflected in research, media coverage, audit results, Fair Wear's country study, information from NGO's and based on our own experiences. These insights can help us together conducting (human rights-) due diligence which is an ongoing risk management process to identify, prevent and mitigate risks. By signing this document, you declare to be aware of these risks and will take action to mitigate the exposure to these potential risks.

### 1. Migrant labour

Every supplier must investigate whether its supply chain involves migrant labour. Migrants/refugees with temporary protection are able to obtain a work permit; however, concerns remain around the ability of migrants/refugees to obtain these permits due to registration restrictions and complications in the application process. As a result, child labour and informal employment remain serious concerns. We want to make clear any involvement in child labor will not be tolerated and will lead to termination of the partnership. Under no circumstances the vulnerability of refugees should be used to deny them their basic human rights.

#### Are you aware of this risk?

- Yes
- No

#### Have you employed any Migrant worker in your supply chain during the past year?

*If not, what is the reason behind? If yes, have you acquire work permit for your migrant workers?*

[Click here to enter text.](#)

#### How do you prevent and mitigate this risk?

- We have a procedure in place for registering migrant/refugee employees (*please attach*)
- All migrant/refugee workers are enrolled in the registration process
- We train staff on labour laws and how to overcome language barrier, including those relevant to migrants/refugees
- We have an internal grievance mechanism in place\*
- We have an external grievance mechanism in place, like from Fair Wear Foundation (including the right language)\*
- We partner with (local) NGO's on **migrant workers related to work**. Name: [Click here to enter text.](#)
- Other: [Click here to enter text.](#)

*\*In case you have a grievance mechanism in place:*

Were there any complaints? If yes, how many? [Click here to enter text.](#)

How did you handle these complaints? [Click here to enter text.](#)

## 2. (Unknown-) Subcontracting

In Türkiye a wide subcontractor chain is the norm across all type of factories. Higher risks occur in deeper tiers as working conditions typically get worse down the supply chain. Due to the high risk of human rights violations, unauthorized subcontracting is not acceptable. We have a [subcontracting policy](#) in place in which we describe our approach towards subcontracting. We do accept subcontracting if well motivated, however, the matter should be discussed transparently beforehand.

**Are you aware of this risk at deeper tiers?**

- Yes
- No

**Are you actively working with any partners/subcontractors for the production?**

*If yes, please list your partners/subcontractors.*

[Click here to enter text.](#)

**How do you prevent and mitigate this risk?**

- All subcontractors are identified and included in audit and compliance programs
- We have shared our policies on human rights with all subcontractors. (please attach policy)
- All subcontractors are verified before starting the relationship
- We have a transparent relationship with our subcontractors and visit on a continuous basis
- We have an internal grievance mechanism in place\*
- We have a grievance mechanism placed at external locations\*
- We engage with (local) NGO's on this issue. Name: [Click here to enter text.](#)
- Other: [Click here to enter text.](#)

*\*In case you have a grievance mechanism in place:*

Were there any complaints **at the deeper tiers**? If yes, how many? [Click here to enter text.](#)

How did they (and eventually you) handle these complaints? [Click here to enter text.](#)

### 3. Freedom of Association, Social dialogue and Collective Bargaining

Türkiye has ratified [ILO Conventions 98](#), [ILO Convention 87](#) and [ILO Convention 135](#) on freedom of association and the right to collective bargaining. However, the current legislation and practice make it challenging to exercise this right. In the cases of violation of FOA, courts do not prioritize reinstatement as a basis but a last option.

**Are you aware of this risk?**

- Yes
- No

**How is independent worker representation organized at your factory?**

- We have a written policy regarding freedom of association and social dialogue
- There is a registered active trade union
- An active and independent local trade union
- An effective worker representative committee (WRC)
- An elected workers council
- A health and safety committee
- An annual leave committee
- An anti-harassment committee
- We have a well-functioning internal grievance mechanism in place\*
- We have an external grievance mechanism in place\*
- We raise awareness of the importance of worker representatives and social dialogue
- We engage with (local) NGO's on this issue. Name: [Click here to enter text.](#)
- Other: [Click here to enter text.](#)

*\*In case you have a grievance mechanism in place:*

Were there any complaints? If yes, how many? [Click here to enter text.](#)

How did you handle these complaints? [Click here to enter text.](#)

**Are labour conditions collectively negotiated? Is there a collective bargaining agreement that applies to your factory? Who are the negotiating parties of this agreement?**

[Click here to enter text.](#)

#### 4. Energy power cuts

Many production countries are struggling with a severe shortage of electricity and/or gas, resulting in power cuts and blackouts causing delays because of production interruptions. This could lead to production interruptions and therefore, also put a risk on code of conduct principles (e.g. overtime to make up for production losses).

**Do you have an alternative/emergency power supply to cover shortages of power cuts?**

- Yes, please explain: [Click here to enter text.](#)
- No

#### 5. Financial stability

Undertaking a contract with a financially unstable supplier could result in issues such as interrupted supply, or decreased quality of the product if the supplier must cut costs in order to make profit. Or worse, that the supplier business could fail.

**Please describe the ownership structure of the business entity and support this with evidence**

[Click here to enter text.](#)

**Please provide a cash flow statement for the past 2 years to measure if your business has a positive liquidity (in Turkish Lira)**

- 2020 [Click here to enter text.](#)
- 2021 [Click here to enter text.](#)

**Solvency ratio (the ability of your business to pay off its debts and obligations)**

*Please mention in %.*

[Click here to enter text.](#)

**Please list your 3 biggest customers.**

	<i>Customer name</i>	<i>% of the production capacity per customer</i>
○ Customer 1	<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>
○ Customer 2	<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>
○ Customer 3	<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>

***NOTE: please provide published financial statements and/or other documents to support your answers above.***

By signing this document you declare to be aware of these risks and take action to mitigate the exposure to these potential risks.

Date: Click here to enter text.

Supplier: Click here to enter text.

Name MD: Click here to enter text.

Signature:

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Company  
chop:

