



[2019]

## FAIR LABOR ASSOCIATION INDEPENDENT EXTERNAL MONITORING AGRICULTURAL REPORT

**Company:** Olam

**Country:** Turkey

**Crop:** Hazelnut

**Production Process:** Harvest

**Assessment Location:** Karapurcek and Karasu, Sakarya, Turkey

**Monitor:** Mertol Dogru

**Assessment Dates:** 09-13 September 2019

**Number of assessed farms:** 7

**Total area covered:** 18.45 ha

**Number of farmers interviewed:** 7

**Total number of workers:** 108

**Number of workers interviewed:** 33

To view more about the FLA's work with Olam, please visit the FLA website [here](#).  
To access the FLA Agriculture Monitoring Benchmarks, please visit [this page](#).

## Employment Relationship

### Compliance Status

Section	Benchmark	Compliance status	Farms
Human Resource Management System	ER.1.1	In compliance	
	ER.2.1 (PR)	In compliance	
	ER.2.1.1 (PR)	In compliance	
Recruitment and Hiring	ER.3.1	Noncompliance	All farms
	ER.3.1.1	In compliance	
	ER.3.1.2	Noncompliance	All farms
	ER.4	In compliance	
	ER.5.1	Noncompliance	Farm 1, Farm 2, Farm 3, Farm 4, Farm 5, Farm 7
	ER.5.2	In compliance	
	ER.5.3	In compliance	
	ER.6 (PR)	In compliance	
	ER.7.1	In compliance	
	ER.7.2	In compliance	
	ER.7.3	In compliance	
	ER.7.4	In compliance	
	ER.7.5	In compliance	
	ER.7.6	In compliance	
	ER.7.7	In compliance	
ER.7.8	In compliance		
Terms and Conditions	ER.9.1	Noncompliance	All Farms
	ER.9.2	In compliance	
	ER.9.2.1	In compliance	
	ER.9.2.2	In compliance	
	ER.9.2.3	Risk of noncompliance	All Farms
	ER.9.3	In compliance	
	ER.9.3.1	In compliance	
	ER.9.3.2	In compliance	
	ER.9.3.3	In compliance	
	ER.10	N/A	
	ER.11	In compliance	
	ER.12.1	Noncompliance	Farm 6, 7
	ER.12.1.1	In compliance	
	ER.12.2	In compliance	
	ER.13.1	In compliance	
ER.13.2 (PR)	In progress	All farms	
ER.13.3 (PR)	In compliance		
Administration	ER.15.1	In compliance	
	ER.15.2	In compliance	
	ER.15.2.1	Risk of noncompliance	Farm 6, 7
	ER.16.1	In compliance	
	ER.16.2	In compliance	
	ER.17.2 (PR)	In progress	All farms
	ER.17.3 (PR)	In compliance	
ER.17.4 (PR)	In compliance		
Worker Involvement	ER.18.1	In compliance	
	ER.18.2 (PR)	In compliance	
Right to Organize and Bargain	ER.19	In compliance	
Work Rules and Discipline	ER.20.1	Risk of noncompliance	All farms.
	ER.20.2	Risk of noncompliance	All farms.
	ER.20.3 (PR)	In progress	All farms.
	ER.20.4	Risk of noncompliance	All farms.
	ER.20.6	Risk of noncompliance	All farms.
	ER.20.7	Risk of noncompliance	All farms.

	ER.20.8	Risk of noncompliance	All farms.
	ER.20.9 (PR)	In compliance	
	ER.20.11	Risk of noncompliance	All farms.
Access to Training for Family Members	ER.21	In compliance	
HSE Management System	ER.24.1.	Risk of noncompliance	All farms.
	ER.24.2 (PR)	In compliance	
	ER.24.3	In compliance	
	ER.24.4 (PR)	In compliance	
	ER.24.4.1 (PR)	In compliance	
	ER.24.4.2 (PR)	In compliance	
	ER.24.4.3 (PR)	In compliance	
	ER.24.4.4 (PR)	In compliance	
	ER.24.4.5 (PR)	In compliance	
	ER.24.4.6 (PR)	In compliance	
Grievance Procedures	ER.25.1 (PR)	In compliance	
	ER.25.2 (PR)	In progress	All Farms
	ER.25.3	In compliance	
	ER.25.4	In compliance	

### Employment Relationship Assessment Summary

#### Notable Feature

Olam facilitated legal contracts between farmers, labor contractors, and seasonal migrant workers. Labor contractors mapped in Olam's supply chain to prevent illegal work in their supply chain and make sure that they are registered to the Turkish employment bureau and certified accordingly.

#### Proof of Age Documentation

**Benchmarks:**

**ER.3.1:** Employers shall verify proof of age documentation for all young workers in the farm at the time of their employment and work towards collecting and maintaining all documentation necessary to confirm and verify date of birth of all workers, including long term and casual workers.

**ER.3.1.2:** In those cases where proof of age documentation is not readily available or unreliable, employers shall take all necessary precautions which can reasonably be expected of them to ensure that all workers are at least the minimum legal working age, including requesting and maintaining medical or religious records of workers, or through other means considered reliable in the local context.

**ER.5.1:** No worker hired by an employment agency or a labour contractor shall be compensated below the legal minimum wage. The same rights as provided for directly hired contract workers apply for workers hired via an employment agency or labor intermediary.

**Noncompliance  
in all farms**

**Farm 1, 2, 3, 4,  
5, 7**

**Findings/Noncompliance  
Explanation:**

ER.3.1: Olam provided training to farmers on how to implement an age verification system. To increase documentation at the farm level, Olam also distributed Farmers' Handbook in which farmers can record workers' names, age, and other relevant information. Documentation practices are still deficient amongst hazelnut farmers. Assessed farmers were not verifying proof of age documentation for workers on the farm at the time of their employment and work. They were not keeping the ID copies of their workers. However, a list of the working groups was prepared, which included the name of the worker, ID Number, sex, and birthdate. These lists were prepared very recently before the audit. The growers are getting used to record the name of worker, ID Number, sex, and birthdate and establish a

	<p>sound age verification system gradually.</p> <p>ER.3.1.2: Proof of age documentation is readily available or reliable, but employers have not taken all necessary precautions, which can reasonably be expected of them to ensure that all workers are at least the minimum legal working age. Such as keeping ID photocopy.</p> <p>ER 5.1: Farmers use labor contractors for finding workers. In practice, labor contractors deduct a commission from worker wages as a recruitment fee. When farmers are paid the minimum wage given by local commissions, workers receive less than the minimum wage because local law and commission decisions require the commission of the labor contractor to be paid separately.</p> <p><u>Source:</u> Interviews with workers, labor contractors, and farmers. Documentation review. Visual inspections.</p>
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**Company Action Plan:**

<p><b>Activity</b></p>	<p>Olam acts with the belief that the projects carried out to prevent child labor in seasonal hazelnut farming and to improve the working and living conditions of the workers should be a progressive chain. Olam carries out simultaneous projects on three main target groups (farmer-worker-labor contractor) and realizes these projects in cooperation with non-governmental organizations. In the 2018 crop year, the Ministry of Family, Labor, and Social Services and Olam signed a cooperation protocol. Pikolo Association, Foundation For Support of Women Work, and Eđitmen Panda were also included in the protocol.</p> <p>Olam conducts sustainable activities in Düzce, Sakarya, Giresun and Ordu provinces. In these provinces, hazelnut farmers are trained on agricultural and social issues throughout the year. Training contents:</p> <ul style="list-style-type: none"> <li>• Documentation (Worker's ID photocopies archive)</li> <li>• Occupational Health and Safety</li> <li>• Child Labor</li> <li>• Young Labor</li> <li>• Non-discrimination</li> <li>• Forced Labor</li> <li>• Harassment or Abuse</li> <li>• Gender</li> </ul> <p>Olam updated its Good Social Practices Files that it launched in 2018. Starting from the habit of keeping a notebook of the farmers, it ensured that the social files were turned into a handbook. It has integrated many procedures to the farmer's book. Such as Seasonal Agricultural Labor Contract, the Family Permission Form for Young Workers and identity copies, where the farmers can keep the workers' records. Another responsibility belongs to headmen for maintaining workers' records. Meetings will be held with headmen who have a significant impact on farmers. As a result of the awareness to be created in the headmen, farmers will be provided with the necessary information and guidance.</p> <p>Olam carries out training and certification studies for labor contractors that serve as a bridge between workers and farmers. For this study; Within the scope of the Harvesting the Future Project run by FLA:</p> <ul style="list-style-type: none"> <li>• Six labor contractors in Şanlıurfa on 28 Jan 2020.</li> <li>• 17 labor contractors in Diyarbakır on 30 Jan 2020.</li> </ul>
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	<p>And totally, 23 new labor contractors were trained and certified.</p> <p>For the first time, a female labor contractor has been certified in the Olam supply chain. (in Diyarbakır).</p> <p>The certified labor contractors trained on many issues such as formal employment, child labor, occupational health and safety, and young labor. Labor contractors participating in the training and certification work will be given consultancy by the Olam social workers throughout the year. With this work; they will be provided to sign the seasonal agricultural labor contract, which is another condition for formal employment, and will ensure that workers' records are kept and their rights secured.</p> <p>The contract conditions include:</p> <ul style="list-style-type: none"> <li>• Minimum wage guarantee.</li> <li>• ID information.</li> <li>• Advance information.</li> <li>• No wage cut.</li> <li>• Legal working hours (eight hours).</li> <li>• OHS measures.</li> <li>• Safe transportation.</li> <li>• Appropriate meal and housing conditions.</li> <li>• And the opportunity to work in a suitable working and living environment.</li> </ul> <p>With the increase in registered employment, it will make the e-METIP system, which the state has prepared for the purpose of monitoring seasonal agricultural workers, functional. The establishment purpose of the system is to monitor the migration movements of seasonal agricultural workers throughout the year and to improve the working and living conditions of the workers by performing the necessary inspections. Another aim of the system is to monitor child labor by following the workers' children and thus prevent the deficiency in education. A significant increase is observed in the signed contracts and this increase is an indicator of the positive effect of training and consultancy on farmers, workers and labor contractors. Olam will continue to consult farmers and labor contractors and improve the quality and scope of origin studies.</p>
<p><b>Output indicators (targeted results)</b></p>	<p>2,500 farmers will be trained on Proof Age Documentation with a total of 80 training in Sakarya and Düzce provinces.</p> <p>120 labor contractors who bring workers to Sakarya and Düzce provinces will be given consultancy.</p> <p>Sustainable Farmer Handbooks containing ID photocopies, gender and age verification information will be delivered to all 1,257 sustainable farmers in Sakarya and Düzce.</p> <p>In the 2020 harvest period, a total of 120 seasonal agricultural labor contracts will be signed in Sakarya and Düzce provinces.</p> <p>In Karasu, Karapürçek, Kocaali and Akçakoca districts, a total of ten headmen will be informed about the proof of age documentation.</p>
<p><b>Timeline and Deadline Date</b></p>	<p>August 2019- September 2020 / 31 Sept. 2020</p>
<p><b>Input (budget/resources)</b></p>	<p>Four full time Olam social workers / four temporary social workers, training costs</p>

	and cost of the farmer handbooks.
<b>Responsible staff</b> (title/department)	Arif Fidan / Social Worker Esra Aysan / Social Worker

<b>Terms and Conditions</b>	
<p><i>ER.9.1: Workers should be made aware of the employment terms under which they are engaged.</i></p> <p><i>ER.9.2: Employment terms shall be those to which the worker has voluntarily agreed, provided those terms do not fall below:</i></p> <p><i>ER.9.2.3: the FLA Workplace Code.</i></p>	<p><b>Risk of Noncompliance in all farms</b></p>
<p><i>ER.12.1: Employers shall regularly inform workers about workplace rules, health and safety information, and laws regarding workers' rights with respect to freedom of association, compensation, working hours, and any other legally required information, and the FLA Code through appropriate means, including posted in local language(s) throughout the workplace's common areas or in the surrounding community. In the case of workplaces with informal labor structures, these communication and awareness raising activities could be done with support from supply chain intermediaries such as cooperatives, organizers, tier one suppliers or the participating company.</i></p>	<p><b>Noncompliance in two farms</b></p>
<p><b>Findings/Noncompliance Explanation:</b></p>	<p>ER 9.1. Although one of the Olam's implementing partner KEDV has been conducting worker trainings and home visits for seasonal migrant agriculture workers to inform workers about wage determinations, wage cuts, child labor, workers' rights, occupational health and safety, the monitoring team found that some workers and supervisors interviewed have limited knowledge of rights as workers and workplace standards. According to the training records in February 2019, 339 seasonal agricultural workers were reached and the labor contractors found in the farms trained by Olam and its implementing NGO partners.</p> <p>Workers interviewed had difficulty to fully recall the employment terms, which are determined via verbal contracts, mainly between workers and farmers. For instance, the workers know that they would be paid above the minimum wage announced by the local commission, but the exact wage would be set when the big orchard owners would make the first payment. Besides, verbal contract terms do not cover various necessary subjects such as penalties, termination conditions, and provision of national law.</p> <p>ER 9.2.3 Although the growers have the latest FLA Code in hand. The efficiency of farmer training is still limited; not all farmers and labor contractors know the local labor laws, the FLA Code, and labor rights. While some of the workers are aware of the employment terms, five out of seven farmers made written contracts with the signatures of the farmers, labor contractors as well as the workers.</p> <p>ER 12.1 Not all farmers regularly inform workers about workplace rules, health and safety information, and laws about workers' rights concerning freedom of association, compensation, working hours, and any other legally required information. Five out of seven farms visited made contracts which specify compensation, working hours and other legally required information.</p> <p><u>Source:</u> Interviews with farmers and workers.</p>
<b>Company Action Plan:</b>	
<p><b>Activity</b></p>	<p>Olam provides training and consultancy to farmers in Olam's supply chain on FLA Code, Worker Rights, Occupational Health and Safety, Workplace Rules and will continue this year. With this training, Olam aims to get hazelnut farmers to employ their workers according to the rules and regulations. On the other hand, Sustainable Farmer Handbook, which includes the necessary documents will be distributed.</p>

	<p>A detailed information about the workplace rules and awareness study will be given to the headmen who have a public identity. It will ensure that headmen will explain "employer responsibilities" to farmers in the training.</p> <p>Workers' wages are determined by the commission under the autonomy of the Governorships every year. Olam will work on the determination and announcement of wages at least two weeks before harvest. For this purpose, Olam will hold meetings with local administrations (muhtars and district governorships). It will be ensured that local governments are aware of the issue and so the wages to be determined by the governorships are announced before the workers arrive at the harvest. On the other hand, Olam will perform for labor contractors, who are workers' representatives, will be allowed to attend wage determination commission meetings. In this way, labor contractors will be provided to complete their rights advocacy role as they should.</p> <p>Olam will continue its origin activities this year with the Women on The Roads For Hazelnut Project. The project will cover four provinces: Şanlıurfa, Mardin, Diyarbakır and Şırnak. Throughout the year, seasonal agricultural workers, especially women, will be trained on issues such as Worker Rights, Occupational Health and Safety, Workplace Rules. The training will be held through home visits. Handbooks were designed, which include training issues. Handbooks designed in Turkish and Kurdish will be distributed to the workers. It is designed as a visual for illiterate workers.</p> <p>Emphasis will be placed on the importance of formal employment through training and other workshops that will be given to workers and farmers simultaneously throughout the year, and they will be made aware of the importance of seasonal agricultural contracts.</p>
<p><b>Output indicators (targeted results)</b></p>	<p>Sustainable Farmer Handbook containing Local Laws and Workplace Rules will be distributed to all 366 farmers in Karasu and Karapürçek districts.</p> <p>In the 2020 harvest period, a total of 120 seasonal agricultural labor contracts will be signed in Sakarya and Düzce provinces.</p> <p>In Karasu, Karapürçek, Kocaali and Akçakoca districts, a total of ten headmen will be informed about the workplace rules.</p> <p>900 Turkish and Kurdish handbooks will be distributed to workers</p> <p>Within the scope of the Women on The Roads For Hazelnut Project, 900 women will be trained with 380 household visits.</p>
<p><b>Timeline and Deadline Date</b></p>	<p>August 2019- September 2020 / 31 Sept. 2020</p>
<p><b>Input (budget/resources)</b></p>	<p>Four full time Olam social workers / four temporary social workers, training costs, cost of farmer handbook and annual cost of the Women on the Roads For Hazelnut project.</p>
<p><b>Responsible staff (title/department)</b></p>	<p>Arif Fidan / Social Worker Esra Aysan / Social Worker</p>

<b>Administration</b>	
<b>Benchmarks:</b> <i>ER.15.2.1: Advances must be properly documented, and their receipt and accuracy must be confirmed by the recipient worker, in writing whenever possible (e.g. signature, thumbprint).</i>	<b>Risk of Noncompliance in all farms</b>
<b>Findings/Noncompliance Explanation:</b>	<p>ER 15.2.1 Advances were not properly documented in all seven farms visited, and their receipt and accuracy were confirmed by the recipient worked, but this was not in written form (e.g., signature, thumbprint). Five farmers made contracts which also have references to advances. Olam distributed Advance Request Forms to farmers and included them in the social files provided to them.</p> <p><u>Source:</u> Interviews with workers, labor contractors. Documentation Review</p>
<b>Company Action Plan:</b>	
<b>Activity</b>	<p>Olam has achieved a serious increase in the 2019 harvest within the scope of the work on signing the Seasonal Agricultural Labor Contract that it started in 2018. Olam will carry out qualitative activities to increase this number in the 2020 harvest and complete the terms of the contract, and so will increase the public awareness in line with the increase in the number. Conditions provided by contract work:</p> <ul style="list-style-type: none"> <li>• Advance information.</li> <li>• Minimum wage guarantee.</li> <li>• ID information.</li> <li>• No wage cut.</li> <li>• Legal working hours (eight hours).</li> <li>• OHS measures.</li> <li>• Safe transportation.</li> <li>• Appropriate meal and housing conditions.</li> <li>• And the opportunity to work in a suitable working and living environment.</li> </ul> <p>A social file was created, which includes the signed contracts, the procedures that farmers are obliged to inform the workers, and advance claim forms. Olam designed a handbook that included all needed forms in 2019. Due to the high number of relevant documents, it becomes difficult for farmers to archive. It has been designed as a handbook to prevent this problem. Sustainability Advance Request Form is also included in the handbook. The use of the form will be mentioned in farmer training. In the duration of distributing handbooks to farmers and consulting, farmers who give advance to their workers will be identified and advance request forms will be signed.</p>
<b>Output indicators (targeted results)</b>	<p>Sustainable Farmer Handbook containing Advance Request Form will be delivered to all 97 sustainable farmers in Paralı village.</p> <p>Seasonal agricultural labor contracts will be signed for 20 farmers who employ workers in Paralı village in the 2020 harvest period.</p> <p>Ten farmers and workers will be provided to sign the Advance Request Form.</p>
<b>Timeline and Deadline Date</b>	August 2019- December 2020 / 31 Dec. 2020
<b>Input (budget/resources)</b>	Four full time Olam social workers / four temporary social workers and cost of the



	farmer handbooks.
<b>Responsible staff</b> (title/department)	Arif Fidan / Social Worker Esra Aysan / Social Worker

### Work Rules and Discipline

<p><b>Benchmarks:</b></p> <p><i>ER.20.1: Employers shall have disciplinary rules and practices that embody a system of progressive discipline (e.g. a system of maintaining discipline through the application of escalating disciplinary action moving from verbal warnings to written warnings to suspension and finally to termination).</i></p> <p><i>ER.20.2: Any person supervising workers shall be aware of the disciplinary rules and practices.</i></p> <p><i>ER.20.4: The disciplinary system shall be applied in a fair and non-discriminatory manner and include a management review of the actions by someone senior to the manager who imposed the disciplinary action.</i></p> <p><i>ER.20.6: Disciplinary rules and practices shall be clearly communicated to all workers.</i></p> <p><i>ER.20.7: Workers must be informed when a disciplinary procedure has been initiated against them.</i></p> <p><i>ER.20.8: Workers have the right to participate and be heard in any disciplinary procedure against them.</i></p> <p><i>ER.20.11: The disciplinary system shall include a third party witness during imposition, and an appeal process. In case of smallholder settings, existing appeal mechanism at community level is acceptable.</i></p>	<p><b>Risk of Noncompliance in all farms</b></p>
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<p><b>Findings/Noncompliance Explanation:</b></p>	<p>ER 20.1- 20.2 = Although disciplinary rules to be followed on the farm are included in the Farmer's social files, Farmer's handbooks distributed to Paralı village, workers and growers couldn't recall the disciplinary rules. None of the growers has punished anybody for not working well or working slow. The working group leader (Cavus) handles conflicts between the workers. If needed, ask for the support of the grower. Most of the working groups consist of family members.</p> <p>ER20.4-20.11= Disciplinary rules are in the handbook of the producers but are not known and implemented by the producers.</p> <p><u>Source:</u> Worker Interview-Grower Interview.</p>
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### Company Action Plan:

<p><b>Activity</b></p>	<p>Disciplinary rules to be followed on the farm are included in the Sustainable Farmer Handbooks. These rules aim for farmers, workers and labor contractors to perform their duties, to act in accordance with work discipline and land order in the production area or in their relations with third parties. Olam will hang information boards to increase the visibility of these rules to seasonal migrant workers especially. In information boards:</p> <ul style="list-style-type: none"> <li>• Do not employ child labor.</li> <li>• Contract with your labor contractor.</li> <li>• Tell your workers the numbers that should be called in an emergency.</li> <li>• Supply drinking and hand washing water.</li> <li>• Do not employ workers more than eight hours a day.</li> <li>• Do not give young workers heavy jobs.</li> <li>• Do not violence and discrimination.</li> <li>• Pay the labor contractor wage separately from the wage.</li> </ul> <p>Rules such as are written. Olam's complaint and support line are also in this information board.</p> <p>Olam will organize a training in the village of Paralı on the procedures in the Sustainable Farmer Handbook. Detailed information will be given on Farm Discipline Procedure, Disabled Employee Procedure and Pregnant and Breast Feeding Employee Procedure. On the other hand, a video about the use of the Sustainable Farmer Handbook and the Discipline Rules will be shot and shared</p>
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	<p>from corporate social media accounts to reach all farmers, labor contractors and workers.</p> <p>Within the scope of the Women on The Roads For Hazelnut Project; Interviews will be held at the "Seasonal Agriculture and Workers Rights" council to be broadcast on local TV channels during the harvest period. In this way, it will be ensured that workers' rights are kept on the agenda (calendar) and the awareness of the society will be increased.</p>
<b>Output indicators</b> (targeted results)	<p>97 farmers in Paralı village will be trained on discipline rules.</p> <p>A total of 50 information boards will be hung on the village squares in the Sakarya and Düzce provinces.</p> <p>100 posters will be printed and hung on village squares and district entrances and exits.</p> <p>Within the scope of the Women on The Roads For Hazelnut Project, 900 workers will be reached with 380 household visits.</p> <p>Public awareness will be increased through interviews to be broadcast on local TVs.</p>
<b>Timeline and Deadline Date</b>	August 2019- December 2020 / 31 Dec. 2020
<b>Input (budget/resources)</b>	Four full time Olam social workers / four temporary social workers, training costs, costs of the printing of the posters, information boards and annual cost of the Women on the Roads For Hazelnut project.
<b>Responsible staff</b> (title/department)	Arif Fidan / Social Worker Esra Aysan / Social Worker

<b>HSE Management System</b>	
<p><b>Benchmarks:</b></p> <p><i>ER.24.1: Health, safety and environmental rules shall be communicated to all workers in the local language or language spoken by workers if different from the local language.</i></p>	<p><b>Risk of Noncompliance in all farms</b></p>
<b>Findings/Noncompliance Explanation:</b>	<p>Although Olam distributed 2257 Best Practices Handbooks For Workers include Occupational Health and Safety Rules for workers and stakeholders, labor contractors in Mardin, Diyarbakır, and Mersin in three different languages, evidence of communication materials during visit were limited.</p> <p><u>Source:</u> Producer and worker interviews.</p>
<b>Company Action Plan:</b>	
<b>Activity</b>	<p>Olam launched the "Women on The Roads For Hazelnut Project" for its origin activities. The training will focus on women's health and hygiene. The project employs experts on health and hygiene including an expert who has a nurse license. Within the scope of the project, ten women will have the official certificate of "First Aid". Women will be selected from those working in different farms. The project that will be carried out in Mardin, Diyarbakır, Şırnak and Şanlıurfa provinces, training will be organized for seasonal agricultural workers and all groups will be visited four times. Occupational Health and Safety is among the</p>

	<p>main topics of these house visits. Within the scope of the training, it is aimed that the workers are informed about the following issues:</p> <p><b>General health - protective behaviors</b></p> <ul style="list-style-type: none"> <li>• Cleaning.</li> <li>• Nutrition and Food Safety.</li> <li>• Regular Life and Sleep.</li> <li>• Physical Activity.</li> <li>• Coping with Stress.</li> <li>• Smoking.</li> <li>• Childhood Diseases.</li> <li>• Health Controls.</li> </ul> <p>First Aid in bleeding, fractures, wounds, burns, freezes, blockages, insect bites</p> <p><b>Protective behaviors for women's health</b></p> <ul style="list-style-type: none"> <li>• Risky Situations Specific to Women's Health.</li> <li>• Safe Motherhood.</li> <li>• Protection from Genital Infections.</li> <li>• Interventions for Breast Cancer and Its Early Diagnosis.</li> <li>• Cervical Cancer and Interventions for Early Diagnosis.</li> <li>• Sexually Transmitted Infections.</li> <li>• Regulation of Fertility.</li> </ul> <p>Within the scope of the Harvesting the Future Project run by FLA, joint worker training will be organized in Diyarbakır, Şanlıurfa, Mardin and Batman provinces. Olam agreed with two academicians affiliated to Düzce University Faculty of Health Sciences for these trainings. One of the main topics of the training will be Occupational Health and Safety. It is known that one of the academicians who will provide training on the subject has an Occupational Health and Safety license. This will increase the quality of education.</p> <p>Occupational health and safety will be handled as a separate module in farmer training. On the other hand, there will be forms in the handbook that will be distributed to farmers, stating that occupational health and safety conditions must be met. A seasonal agricultural labor contract will be signed to guarantee occupational health and safety conditions.</p>
<p><b>Output indicators (targeted results)</b></p>	<p>Sustainable Farmer Handbook, which includes information on Occupational Health and Safety, will be delivered to all 1,257 sustainable farmers.</p> <p>A total of 120 seasonal agricultural labor contracts that guarantee the Occupational Health and Safety conditions will be signed in the provinces of Sakarya and Düzce in the 2020 harvest period.</p> <p>Within the scope of the Women on The Roads For Hazelnut Project, 900 workers will be given training on Occupational Health and Safety with 380 household visits.</p> <p>Numbers to be reached in the trainings to be held under the FLA Harvesting the Future Project:</p> <ul style="list-style-type: none"> <li>• Mardin: 200 workers will be reached during the two-day training. 150 Olam workers and 50 workers from other suppliers will benefit from these training.</li> <li>• Batman: 130 workers will be reached during the two-day training. 80 Olam workers and 50 workers from other suppliers will benefit from these training.</li> </ul>

	<ul style="list-style-type: none"> <li>• Diyarbakır: Olam will direct 50 workers to training for two days.</li> <li>• Şanlıurfa: Olam will direct 240 workers to the five-day training.</li> </ul> <p>A total of 520 workers who work in the Olam Supply Chain will receive training.</p>
<b>Timeline and Deadline Date</b>	August 2019- December 2020 / 31 Dec. 2020
<b>Input (budget/resources)</b>	Four full time Olam social workers / four temporary social workers, training costs and cost of the farmer handbook and annual cost of the Women on the Roads For Hazelnut project.
<b>Responsible staff (title/department)</b>	Arif Fidan / Social Worker Esra Aysan / Social Worker

### Non-discrimination

**Compliance Status – In Compliance**

#### Non-Discrimination Assessment Summary

##### Notable Feature

Training and Awareness Raising

In the 2019 harvest, Olam organized trainings on workers' rights, gender equality, discrimination, health, and safety to seasonal migrant workers in both workers' origin cities in the southeast of Turkey and during the harvest in the Black Sea region.

### Harassment or Abuse

**Compliance Status – In Compliance**

#### Harassment or Abuse Assessment Summary

##### Notable Feature

Olam's sustainability team conducted training for female agricultural workers by providing good labor practices training that includes gender equality and financial literacy, as well as raising awareness to eliminate child labor.

## Forced Labor

### Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	F.1	In compliance	
Freedom in Employment and Movement	F.2	Risk of Noncompliance	All Farms
	F.3	In compliance	
	F.4.1	In compliance	
	F.4.2	In compliance	
	F.5.1	In compliance	
	F.5.2	In compliance	
	F.5.3	In compliance	
	F.7.1	In compliance	
	F.7.2	In compliance	
	F.7.3	In compliance	
	F.7.4	In compliance	
	F.7.5	In compliance	
	F.7.6	In compliance	
	F.7.7	In compliance	
F.8	In compliance		
Work of Family Members	F.6.1	In compliance	
	F.6.2	In compliance	
	F.6.3	In compliance	
	F.6.4	In compliance	
Personal Workers Identification and Other Documents	F.9	In compliance	

### Forced Labor Assessment Summary

Freedom in Employment and Movement	
<b>Benchmarks:</b> F.2: All workers shall have the right to enter into and to terminate their employment freely.	<b>Risk of Noncompliance in all farms</b>
<b>Findings/Noncompliance Explanation:</b>	The farmers pay workers when work on his/her orchards are completed. When a worker does not want to continue working, he/she would wait until the specific orchard is finished, and the farmer will make payment to the labor contractor for all workers.
<b>Company Action Plan</b>	
<b>Activity</b>	Olam will train workers on issues such as wages, cuts, workers' rights within the scope of the Women on Roads For Hazelnut Project. Turkish and Kurdish flyers, which are the summary of the training, will be distributed to the workers. Within

	<p>the scope of the Women on The Roads For Hazelnut Project, conversations will be held on local TVs on "Seasonal Agriculture and Workers' Rights". Situations on forced labor will be discussed in these interviews and community awareness will be increased.</p> <p>Within the scope of Harvesting the Future Project run by FLA, worker training will be organized in four provinces. Cooperation with the Düzce University Faculty of Health Sciences for these trainings will be carried out by two academicians who are experts in the field of training. The training will include all factors that cause forced labor and forced labor. As a result of the training activities, workers will be aware of forced labor.</p> <p>As a result of training and awareness studies, Olam will ensure that the article "The wages of the worker who wants to leave the work will be paid without delay" is added to the seasonal agricultural labor contract of farmers and labor contractors.</p>
<b>Output indicators (targeted results)</b>	<p>Within the scope of the Women on The Roads For Hazelnut Project, 900 workers will be given training on Occupational Health and Safety with 380 household visits.</p> <p>Numbers to be reached in the trainings under the FLA Harvesting the Future Project:</p> <ul style="list-style-type: none"> <li>• Mardin: 200 workers will be reached during the two-day training. 150 Olam workers and 50 workers from other suppliers will benefit from these training sessions.</li> <li>• Batman: 130 workers will be reached during the two-day training. 80 Olam workers and 50 workers from other suppliers will benefit from these training sessions.</li> <li>• Diyarbakır: Olam will direct 50 workers to training for two days.</li> <li>• Şanlıurfa: Olam will direct 240 workers to the five-day training.</li> </ul> <p>A total of 520 workers who work in the Olam Supply Chain will receive training.</p> <p>Within the scope of the Women on The Roads For Hazelnut Project, 900 workers will be reached with 380 household visits.</p> <p>Public awareness will be increased through interviews to be broadcast on local TVs.</p> <p>900 Turkish-Kurdish handbooks will be distributed</p> <p>A total of 120 seasonal agricultural labor contracts will be signed in Sakarya and Düzce provinces, and the article about payments will be included in the contract.</p>
<b>Timeline and Deadline Date</b>	August 2019- December 2020 / 31 Dec. 2020
<b>Input (budget/resources)</b>	Four full time Olam social workers / four temporary social workers, training costs, cost of farmer handbook and annual cost of the Women on the Roads For Hazelnut project
<b>Responsible staff (title/department)</b>	Arif Fidan / Social Worker Esra Aysan / Social Worker

## Child Labor

### Compliance Status

#### Notable Feature

Olam contributes to projects to keep children away from orchards and help them spend quality educational time. In this regard, Olam leads a project focusing on increasing awareness of child labor and child rights by conducting training program at camps and villages.

Again, Olam collaborates with ILO and Ministry of Labor And Social Security "Ending The Worst Form of Child Labor in Hazelnut Production".

Olam has collaborated with the Ministry of Labor and Social Security with the METIP Mevsimlik Gezici Tarım İşçilerinin Çalışma ve Sosyal Hayatlarının İyileştirilmesi Projesi (Project of Improving Work and Social Life of Seasonal Migrant Agricultural Workers).

Olam provided training to children and the parents together with ILO's instructors at camps. The training was about Health, Safety, and Good Social Practices in Hazelnut Production, Child Labor, Children's Rights, and Good Social Practices and have distributed notebooks, pencils, hats and gloves. The training program continues annually.

Olam carried out its summer school projects to create safe spaces for more children to eliminate child labor. These summer schools and educational projects were implemented in partnership with the Turkish Government Ministry of Family, Labor and Social Services, International Labor Organization, NGOs such as Pikolo Association, The Foundation for Support of Women Work, Kızlar Sahada Initiative.

A complimentary project called "Olam Football and Development Camp: Children on the Field" aims to offer a safe space for children during the hazelnut harvest to prevent them from working on the farms implemented in 2019. The project targeted to distill inherent gender bias in children. The project, implemented in the West and East Black Sea regions, was developed to provide an opportunity for girls and boys to participate in football, drama, and chess jointly.

The Robotic Coding Training was delivered for the first time in 2019. Another educational project aimed to keep the children away from farms to prevent child labor, but also allows children to learn about new subjects and technologies, such as robotic coding.

Olam is organizing parental trainings and educational activities and games for their children about child labor, children rights and good social practices to proactively remediate this issue.

Olam developed child labor removal and remediation policy and procedure. In cases when the team comes across child labor, Olam's agronomist talks to the farmer firstly, and later Olam's staff discuss with the family of the child.

The process below is described in the manual of OLAM:

1. First, the suppliers, producers, agricultural business intermediaries, and the family of the child shall be informed about child labor. If the producer and/or agricultural labor intermediary is not aware of the age of the workers, they are reminded again of the age control system and legal requirements, sanctions, and penalties.
2. The supplier, producer and/or agricultural labor intermediary shall be requested to terminate the employment of the child worker immediately. If there is a person who can take care of the child, the child should be removed from the orchard and sent to the worker's home.
3. Persons responsible for the family or child should be informed about activities such as childcare areas, safe areas, or education/hobby courses in the region and persuaded to direct the child to these centers.
4. If the family does not accept removing the child from work and/or if there is no proper facility (safe space) to take care of the child, the producer is required to pay the daily wages of the child and keep the child away from

work. Famer is also responsible for ensuring the child's safety in the orchard.

5. If approved by the child's parents or persons responsible for the child, the child should be referred to the nearest childcare area, safe area, or place of residence.

6. The supplier, producer, and agricultural business intermediary shall be included in the follow-up monitoring program after the supplier, producer and agricultural labor intermediary are identified to employ child labor.

7. In the unannounced follow-up program, the continuation of child labor was observed. Cases were directed to the social workers affiliated to the Ministry of Family and Social Policies, and the producer is removed from the supplier list so as not to be included in the Sustainability program again.

Section	Benchmark	Compliance status	Farms
General Compliance	CL.1	Noncompliance	Farm 1
Minimum Age	CL.2	Noncompliance	Farm 1
Immediate Family Members	CL.3	In compliance	
Right to Education	CL.4.1 (PR)	In compliance	
Young Workers	CL.5	In compliance	
	CL.6.1	Noncompliance	All Farms
	CL.6.2	In compliance	
	CL.7	In compliance	
Apprenticeships and Vocational Training	CL.8.1 (PR)	In compliance	
	CL.8.2 (PR)	In compliance	
Children on Premises	CL.9	In compliance	
Removal and Rehabilitation of Child Laborers	CL.10.1	In compliance	
	CL.10.2 (PR)	In compliance	

### Child Labor Assessment Summary

General Compliance	
<p><b>Benchmarks</b></p> <p><i>CL.1: Employers shall comply with all national laws, ratified international conventions, fundamental labor rights, regulations and procedures concerning the prohibition of child labor.</i></p>	
<b>Noncompliance in on farm</b>	
<p><b>Findings/Noncompliance Explanation:</b></p>	<p>Monitors assessed seven farms in the scope. One farmer said he had employed one child, which was also verified from the farm records. Monitors did not find any active working child on the farm. But there was high risk in the region of farmers that could have worked with children as they did not actively control the IDs of the children.</p> <p><u>Source:</u> Interviews with workers and worker record form.</p>
<b>Company Action Plan</b>	
<p><b>Activity</b></p>	<p>Provides social trainings based on child labor to the farmers in the Olam supply chain and provides consultancy throughout the year. Olam works to ensure that all farmers are aware of legal working hours and obtain the necessary records.</p> <p>Olam is setting up the Child Labor Monitoring and Remediation System to specifically approach the fight against child labor and improve its work in detection, monitoring and improvement points. The system clearly defines improvements to be made in the fight against child labor, the roles and responsibilities of employees, monitoring methods and reporting. On the other hand, the whole process is handled thoroughly: The profile of the village to be studied, the family profile of the village people, profile of the family that employs</p>



	<p>children are the main points to be considered before the improvement plan is made. The process and follow-up of the improvement can take place in the long term. However, reporting is done annually. In this way, it is aimed to prevent the problem in the Olam supply chain by placing the works for the termination of child labor in a professional system and structure framework. The CLRMS system will be applied in one farm where child workers are identified and in six other farms where there is a risk in Paralı village.</p> <p>Olam distributes Sustainable Farmer Handbooks to its farmers to keep workers' records and review child labor procedures when necessary. Documents that can provide registered employment such as the Seasonal Agricultural Labor Contract and the Young Workers Family Leave Form are added to the handbook. It will be followed throughout the harvest to use the handbook effectively and purposefully.</p> <p>Olam will organize talks on TV programs during the harvest period as part of the Women on The Roads For Hazelnut Project. These interviews will be broadcast on local channels in the Eastern and Western Black Sea Regions and will focus on the following topics:</p> <ul style="list-style-type: none"> <li>• Seasonal Agriculture and Child Labor.</li> <li>• Seasonal Agriculture and Rights.</li> <li>• Seasonal Agriculture and Gender Equality.</li> </ul>
<b>Output indicators (targeted results)</b>	<p>With 80 sessions, 2,500 farmers will be trained on Child Labor and Registered Employment.</p> <p>The CLRMS system will be applied in one farm where child workers are identified and in six other farms where there is a risk in Paralı village.</p> <p>The Sustainable Farmer Handbook, which includes documents that will enable them to keep track of age, will be distributed to 97 sustainable farmers in the village of Paralı.</p> <p>Public awareness will be increased through the interviews to be broadcast on TVs.</p>
<b>Timeline and Deadline Date</b>	August 2019- September 2021 / 31 Sept. 2021
<b>Input (budget/resources)</b>	Four full time Olam social workers / four temporary social workers, training costs and cost of the farmer handbooks and annual cost of the Women on the Roads For Hazelnut project
<b>Responsible staff (title/department)</b>	Arif Fidan / Social Worker Esra Aysan / Social Worker

<b>Minimum Age</b>	
<p><b>Benchmarks</b></p> <p><i>CL.2: Employers shall comply with ILO Convention 138 and shall not employ anyone under the age of 15 or under the age for completion of compulsory education, whichever is higher. If a country has a specified minimum age of 14 years due to insufficiently developed economy and educational facilities, employers might follow national legislations but must work to progressively raise the minimum age to 15 years.</i></p>	<b>Noncompliance in one farm</b>
<b>Findings/Noncompliance Explanation:</b>	One child seasonal migrant worker from the South East of Turkey identified during the field monitoring. Based on interviews and worker list records, the child had performed (collect hazelnuts from the trees and filling-carrying buckets) harvest

	<p>on the hazelnut orchard.</p> <p><u>Source:</u> Interviews with workers and worker records.</p>
<b>Company Action Plan</b>	
<b>Activity</b>	<p>Olam sees informal employment as one of the most significant and most fundamental problems in seasonal agricultural work. Undoubtedly, it approaches the issue of child labor on the same basis. With this perspective, Olam focuses on the "Seasonal Agricultural Labor Contract" which should be signed between the farmer-worker-labor contractor.</p> <p>Olam opened summer schools in five different centers in the Western Black Sea Region in the 2019 harvest. In one of these summer schools, Robotic Coding training was given, and in one the schools "Children on the Area Project" was carried out in cooperation with the Girls on the Area team. With these projects, the quality of summer schools has increased. "As the twig is bent so is the tree inclined" As a message by the proverb, steps are taken to reach the trainings that internalize the gender equality of children and dominate the world today. Olam will continue this path by improving the target number and quality of the projects.</p> <p>The poverty cycle, which is common in seasonal agricultural work, poses a major obstacle to elimination of child labor. Because of the qualitative observations made in the field, Olam has noticed that the adolescent groups want to work due to the financial situation of their family. For this reason, they are moving away from education. To provide positive changes in children's mentality, "philosophy" courses will be provided to children according to their age. Changes in the mentality of children will ensure that they do not lose their education in the short, medium and long term. The study will take place in partnership with Düzce University.</p> <p>With the Child Labor Monitoring and Remediation System, Olam will examine all the factors that cause child labor, profile the village people, farmers and the family employing children and make the necessary improvement plan. The worker family and farmer who take action will be monitored during the harvest.</p> <p>Olam aims to increase public awareness by organizing "Seasonal Agriculture and Child Labor" interviews on local TVs during the harvest period as part of the Women on The Roads for Hazelnut Project.</p>
<b>Output indicators (targeted results)</b>	<p>Seasonal agricultural labor contracts will be signed in the farm where the child is determined.</p> <p>CLMRS will be applied in the farm where the child is detected.</p> <p>A total of 600 children will be reached with five summer schools. In one summer school, robotic coding training will be included in the curriculum, and in one school, the "Children on The Area Project" will be carried out in cooperation with the Girls on The Area team.</p> <p>100 children will be provided to take philosophy lessons.</p> <p>Public awareness will be increased through interviews in local channels.</p>
<b>Timeline and Deadline Date</b>	July 2020- September 2021 / 31 Sept. 2021
<b>Input (budget/resources)</b>	<i>Cost of the summer schools, four full time Olam social workers / four temporary</i>

	social workers, project cost with the Duzce University and annual cost of the Women on the Roads For Hazelnut project.
<b>Responsible staff</b> (title/department)	Arif Fidan / Social Worker Esra Aysan / Social Worker

<b>Young Workers</b>	
<b>Benchmarks</b> <i>CL.6.1: Employers shall comply with all relevant laws that apply to young workers, (e.g., those between the minimum legal working age and the age of 18) including regulations related to hiring, working conditions, types of work, hours of work, proof of age documentation, and overtime.</i>	<b>Noncompliance in all farms</b>
<b>Findings/Noncompliance Explanation:</b>	<p>Olam trained farmers on how to implement age verification systems and distributed Farmers' Handbook in which they can record workers' names and age. The training content also covers workplace rules and terms for young workers, such as age limit and suitable tasks for young workers. However, documentation practices are low among hazelnut farmers. Assessed farmers were not verifying and requesting proof of age documentation. Farmers and/or labor contractors obtain verbal consent from parents of the young workers working in the farms. The young workers work more than eight hours a day as adult workers. The lack of documentation and knowledge creates a risk. Young workers might as well deal with hazardous work (for example, carrying heavy jute bags) even though monitors did not detect any during the assessments.</p> <p><u>Source:</u> Interviews with workers and farmers.</p>
<b>Company Action Plan</b>	
<b>Activity</b>	<p>Olam plans a training module in which only young workers can participate. The general purpose of these trainings is to ensure that the working conditions of young workers continue within the legal framework. In this context:</p> <ul style="list-style-type: none"> <li>• Seasonal Agricultural Sector in General Lines.</li> <li>• Poverty and Poverty Cycle.</li> <li>• What is a Young Worker?</li> <li>• Working Hours.</li> <li>• Light Work / Heavy Work.</li> <li>• Gender equality.</li> <li>• Occupational Health and Safety.</li> <li>• Hygiene.</li> </ul> <p>Detailed training will be given. Young workers coming to the village of Paralı will gather at the summer school and the training will take place there collectively.</p>
<b>Output indicators</b> (targeted results)	50 young workers will be trained in the village of Paralı.
<b>Timeline and Deadline Date</b>	August – September 2020 / 31 Sept. 2020
<b>Input (budget/resources)</b>	Four full time Olam social workers / four temporary social workers, training coasts

<b>Responsible staff</b> (title/department)	Arif Fidan / Social Worker
	Esra Aysan / Social Worker

## Health, Safety and Environment

### Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HSE.1.	In compliance	
Document Maintenance, Permits and Certificates	HSE.2 (PR)	In Progress	All Farms
	HSE.3.1	In compliance	
	HSE.4 (PR)	In compliance	
Evacuation Requirements and Procedure	HSE.5.1 (PR)	In Progress	All Farms
	HSE.5.2	In compliance	
Safety Equipment and First Aid	HSE.6.1 (PR)	In progress	
	HSE.6.2 (PR)	Not Initiated	All farms
	HSE.16.3 (PR)	In compliance	
Personal Protective Equipment	HSE.7 (PR)	In compliance	
	HSE.8	In compliance	
Chemical Management	HSE.9.1	In compliance	
	HSE.9.2	In compliance	
	HSE.9.2.1	In compliance	
	HSE.10	In compliance	
	HSE.11.1	In compliance	
Protection Reproductive Health	HSE.11.2	In compliance	
	HSE.12.1	In compliance	
Infrastructure	HSE.12.2 (PR)	In compliance	
	HSE.13 (PR)	In compliance	
	HSE.17.1	In compliance	
	HSE.17.2 (PR)	In progress	All Farms
	HSE.19 (PR)	In compliance	
	HSE.21 (PR)	In compliance	
Machinery Safety	HSE.22 (PR)	Not Initiated	All farms
	HSE.14.1	In compliance	
	HSE.14.2	In compliance	
	HSE.14.3	In compliance	
Ergonomics and Medical Facilities	HSE.14.4	In compliance	
	HSE.15.2 (PR)	In compliance	
	HSE.16.2	In compliance	

### Assessment Summary

### Notable Feature

The farmers inform the workers on HSE related topics when the workers start harvest work. Olam organizes training in villages where they communicate workers on HSE issues. The issues are also illustrated on the posters which are posted at farms. The migrant workers, monitors interviewed; all could understand and read Turkish. They could understand the message on the illustrative posters. Also, each farmer has a sustainability Record Book where health and safety information are stated. But in recent years, no critical health and safety issues have happened on any farm. Only workers, when they feel sick, ask the grower to bring them to the hospital. The main PPE at hazelnut picking is the cover for the head against the sun. Also, for workers who want gloves for picking hazelnuts are provided gloves by the grower. All interviewed and visually checked workers were carrying hats or scarves to cover their heads. Olam had distributed hats and gloves to all farms we visited.

Olam also supported workers' living conditions by renovating houses, providing mobile showers, toilets, and food packages in the context of access to clean drinking water, hygiene, and nutrition.

## Hours of Work

### Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HOW.1.1	In compliance	
	HOW.1.2	In compliance	
	HOW.1.3	Noncompliance	All farms.
	HOW.1.4	In compliance	
Rest Day	HOW.2	In compliance	
Meal and Rest Breaks	HOW.3	In compliance	
Protected Workers	HOW.4.1	Noncompliance	All farms
	HOW.4.2 (PR)	In progress	All farms
	HOW.4.3	Noncompliance	All farms
Overtime	HOW.5.1	Noncompliance	All Farms
	HOW.5.2	Noncompliance	All Farms
	HOW.6.1	Noncompliance	All Farms
	HOW.6.2	Noncompliance	All Farms
	HOW.6.3 (PR)	In progress	All Farms
	HOW.7	Noncompliance	All Farms
Public Holidays and Leave	HOW.8.1	In compliance	
	HOW.8.2	In compliance	
	HOW.8.3	In compliance	
	HOW.9	In compliance	
	HOW.10.1	In compliance	
	HOW.11 (PR)	In compliance	
	HOW.12.1 (PR)	In compliance	
	HOW.12.2 (PR)	In compliance	
	HOW.13	In compliance	
	HOW.14	In compliance	
	HOW.15 (PR)	In compliance	
HOW.16 (PR)	In compliance		

## Hours of Work Assessment Summary

General Compliance	
<p><b>Benchmarks:</b></p> <p><i>How.1.3: Other than in exceptional circumstances or during short-term seasonal work as described under HOW.2, the total weekly work hours (regular work hours plus overtime) shall not exceed 60 hours per week or the legal limit, whichever is lower. The upper limit during a working day shall not exceed 12 hours.</i></p>	
Noncompliance in all farms	
<b>Findings/Noncompliance Explanation:</b>	<p>The total weekly work hours (regular work hours plus overtime) is exceeding 60 hours per week or the legal limit. However, the upper limit during a working day is not exceeding 12 hours.</p> <p><u>Source:</u> Producer, worker interview.</p>
Company Action Plan	
<b>Activity</b>	<p>Olam carries out remedial projects on all actors in the sector in terms of improving seasonal hazelnut production and living conditions. One of the most important common goals in the projects is to ensure that all legal requirements and FLA Code of Conduct and Benchmarks are met. Working hours are also part of these. In this context:</p> <p>In the village of Paralı, farmers will be trained on working hours specifically.</p> <p>Within the scope of the Women on The Roads For Hazelnut Project, training on working hours and workers' rights will be organized for seasonal agricultural workers. Fliers in Turkish and Kurdish will be distributed to ensure that what is told with the training is permanent. Within the scope of the project, meetings will be held with intermediaries and labor contractors. On the other hand, interviews on "Seasonal Agriculture and Workers' Rights" will be held on local TVs during the harvest period.</p> <p>Olam identified the labor contractors who brought workers to the village of Paralı and certified them; Olam gives consultancy to labor contractors on increasing awareness of on child labor, workers' rights and working hours. In this context, labor contractors will discuss the issues that will be in favor of the workers in the labor contracts signed with farmers.</p> <p>Olam believes that the provision of formal employment will be the basis for the solution and so wants all workers to work under the Seasonal Agricultural Labor Contract. Under the contract, workers' rights are largely guaranteed. Working hours and overtime pay comes first. Although the contract itself does not include hours, the terms of the contract refer to the labor law numbered 4857. This guarantees the issue of working hours directly. Olam believes that if the number of contracts increases in the entire sector, the state will operate the control mechanisms, increase the public awareness at the desired level, and thereby improve working conditions.</p> <p>Training for seasonal agricultural workers will be organized in four provinces (Mardin, Batman, Diyarbakır, Şırnak). Worker rights and working hours will play an important role in the educational content. On the other hand, collaboration with Düzce University will be made in Mardin and Batman provinces and solution suggestions that workers will suggest will be reported by the university and presented to Olam. Studies will be shaped in the perspective of the report.</p>

<p><b>Output indicators (targeted results)</b></p>	<p>97 farmers will be trained on working hours.</p> <p>Consultancy will be provided throughout the year to four labor contractors who employ and document workers in the Paralı village.</p> <p>40 farmers who employed workers in Karasu and Karapürçek districts will sign seasonal agricultural labor contracts.</p> <p>Within the scope of the Women on The Roads For Hazelnut Project, 100 workers will be trained on working hours to work in the village of Paralı.</p> <p>100 handbooks prepared in Turkish and Kurdish will be distributed to the workers.</p> <p>Numbers to be reached in the trainings to be held under the FLA Harvesting the Future Project:</p> <ul style="list-style-type: none"> <li>• Mardin: 200 workers will be reached during the two-day training. 150 Olam workers and 50 workers from other suppliers will benefit from these training sessions.</li> <li>• Batman: 130 workers will be reached during the two-day training. 80 Olam workers and 50 workers from other suppliers will benefit from these training sessions.</li> <li>• Diyarbakır: Olam will direct 50 workers to training for two days.</li> <li>• Şanlıurfa: Olam will direct 240 workers to the five-day training.</li> </ul> <p>A total of 520 workers who work in the Olam Supply Chain will receive training.</p>
<p><b>Timeline and Deadline Date</b></p>	<p>August 2019- December 2020 / 31 Dec. 2020</p>
<p><b>Input (budget/resources)</b></p>	<p>Four full time Olam social workers / four temporary social workers, training costs and cost of the farmer handbooks and annual cost of the Women on the Roads For Hazelnut project</p>
<p><b>Responsible staff (title/department)</b></p>	<p>Arif Fidan / Social Worker Esra Aysan / Social Worker</p>

<p><b>Protected Workers (pregnant or nursing women, young workers)</b></p>	
<p><b>Benchmarks:</b></p> <p><i>How.4.1: The workplace shall comply with all applicable laws governing work hours regulating or limiting the nature, frequency and volume of work performed by pregnant or nursing women or young workers.</i></p> <p><i>How.4.3: If not provided by law, employers must provide protection to workers who allege violations of laws governing work hours limiting the nature, frequency and volume of work performed by pregnant or nursing women or young workers.</i></p>	<p><b>Noncompliance in all farms</b></p>
<p><b>Findings/Noncompliance Explanation:</b></p>	<p>The workplace is not in compliance with all applicable laws governing work hours regulating or limiting the nature, frequency, and volume of work performed by pregnant or nursing women or young workers. The work conditions for all workers, including young workers, are all the same. Olam developed a guidance book and distributed it to the farmer in which the guide informs the conditions of a special group of workers. According to local law, young workers cannot work more than 40 hours a week. The work hours for pregnant or nursing women and/or young workers are the same as regular workers, which considerably pass the legal limits.</p> <p><u>Source:</u> Interviews with workers, labor contractors and farmers.</p>

### Company Action Plan

<p><b>Activity</b></p>	<p>Olam organizes training for farmers, who are in the position of principal employer, on young labor, pregnant and disabled employees. The Sustainable Farmer Handbook, which contains forms regarding the permanence of the information and the status of the workers employed, is distributed. The handbook contains basic information such as "Young Worker Family Leave Form", "Land Discipline Procedure", "Disabled Employee Procedure", "Pregnant and Breast Feeding Employee Procedure" based on local and national laws, FLA Code of Conduct and Benchmarks.</p> <p>Olam aims to increase awareness and prevent this problem by providing training and consultancy to labor contractors on the subject. Labor contractors, which play a key role, have enforcement power over workers and farmers. Therefore, when the labor contractor becomes more aware and provides registered employment, they will also provide positive sanctions on the subject.</p> <p>Young workers and their families will be provided with relevant training and information within the scope of the Women on The Roads for Hazelnut Project. Training will include working procedures, health and other aspects of the procedures. On the other hand, fliers printed in Turkish and Kurdish which include on all the topics described will be distributed.</p> <p>Within the scope of the Women on The Roads for Hazelnut Project, interviews on "Seasonal Agriculture and Workers' Rights" will be organized and broadcast on local TVs. In this way, attention will be drawn to the subject and the public awareness will be increased.</p>
<p><b>Output indicators (targeted results)</b></p>	<p>Training will be provided on 366 farmers in Karasu and Karapürçek districts on young labor, pregnant and nursing employee procedures.</p> <p>Sustainable Farmer Handbook will be distributed to 366 farmers in Karasu and Karapürçek districts and will be provided 100 farmers will be filled in the Young Workers Family Leave Form.</p> <p>All disabled, young, pregnant and nursing workers who are identified in the Paralı village will be provided with training by the Public Health Center.</p> <p>Public Health Centers will train 100 farmers of disabled, young, pregnant and nursing employees during the harvest period.</p> <p>Within the scope of the Women on The Roads For Hazelnut Project, 900 workers will be reached with 380 household visits.</p> <p>Handbooks printed in 900 Turkish and Kurdish will be distributed.</p> <p>Public awareness will be increased through interviews to be broadcast on local TVs.</p> <p>Consultancy will be provided to 120 certified labor contractors who bring workers to Sakarya and Düzce provinces.</p>
<p><b>Timeline and Deadline Date</b></p>	<p>August 2019- December 2020 / 31 Dec. 2020</p>
<p><b>Input (budget/resources)</b></p>	<p>Four full time Olam social workers / four temporary social workers, training costs and cost of the farmer handbooks and annual cost of the Women on the Roads For Hazelnut project.</p>



<b>Responsible staff</b> (title/department)	Arif Fidan / Social Worker Esra Aysan / Social Worker
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<b>Overtime</b>	
<p><b>Benchmarks:</b></p> <p><b>How.5.1:</b> Where national laws, regulations and procedures allow it, employers may calculate regular hours of work as an average over a period of longer than one week, provided all formal and procedural requirements attached to such calculation are met (for instance, obtaining official permission from the relevant authorities or observing limits to the period during which such calculations can be made). However, for the purpose of overtime calculation, regular hours of work may not exceed 48 hours per week, irrespective of whether national law provides or not a limitation.</p> <p><b>How.5.2:</b> Payment of overtime rates is unaffected by a calculation that spreads total hours over more than one week.</p> <p><b>How.6.1:</b> Employers shall not require workers to work more than the overtime hours allowed by the law of the country where the workers are employed.</p> <p><b>How.6.2:</b> All overtime work shall be voluntary.</p> <p><b>How.7:</b> Employers shall be able to provide explanation for all periods when the exceptional circumstances exception has been used. Clear communication and consultation will be held with workers and any extended hours of work will be levied upon obtaining (verbal / written) consensus from the workers.</p>	
<b>Noncompliance in all farms</b>	
<b>Findings/Noncompliance Explanation:</b>	<p>According to the local labor code, the weekly working hours limit is 45 hours. However, for agricultural work, the local commission has set a limit on daily working hours. The commission decision states that workers could work up to 9.5 hours a day. In line with the commission decision, workers start to work at 7 am and finish at 6 pm with a total break of 1.5 hours. A consecutive week's work equals 66.5 hours, which is above the regular working hours limit set by the local code and FLA benchmarks. Moreover, during interviews, workers indicate clearly that they found the working hours very long and exhausting even though they accept these working terms at the beginning of the season because of the general practice and commission decision.</p> <p>In these circumstances, workers work more than weekly working time limits, including the overtime (60 h is the weekly limit). Because the excessive working hours are supported by commission decisions and general practice, workers accept these terms. Moreover, the commission does not recognize overtime.</p> <p><u>Source:</u> Interviews with workers, labor contractors, farmers and Olam.</p>
<b>Company Action Plan</b>	
<b>Activity</b>	<p>One of the problems Olam has identified in the field is that the formations within the local governments make written decisions about overtime and working hours that contradict local laws. For instance, it is seen that the announcements posted by the headmen in the villages contain provisions against the law on working hours. This shows awareness and lack of knowledge about the issue in local governments. Olam will carry out meetings and information activities with the headmen in the supply chain during the year. Regarding the problem, in meetings and visits to local authorities; farmers will be informed about the training and consultancy mentioned.</p>
<b>Output indicators</b> (targeted results)	<p>Informational meetings will be held with local administrations in two provinces and five districts.</p> <p>All disabled, young, pregnant and nursing workers identified in the Paralı village will be trained by the Public Health Center.</p> <p>Public Health Centers will train 100 farmers during the harvest period for disabled,</p>

	<p>young, pregnant and nursing workers.</p> <p>In Sakarya and Düzce provinces, 2,500 farmers will be informed about the working conditions and legislation.</p> <p>120 labor contractors will be consulted.</p> <p>A total of 120 seasonal agricultural labor contracts will be signed in Sakarya and Düzce provinces.</p>
<b>Timeline and Deadline Date</b>	August 2019- December 2020 / 31 Dec. 2020
<b>Input (budget/resources)</b>	Four full time Olam social workers / four temporary social workers, training costs
<b>Responsible staff (title/department)</b>	Arif Fidan / Social Worker Esra Aysan / Social Worker

## Compensation

### Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	C.1.1	In compliance	
	C.1.2	Noncompliance	Farm 6,7
	C.1.3	In compliance	
	C.1.4 PR	In compliance	
Minimum Wage/Fair Compensation	C.2.1	Noncompliance	All Farms
	C.2.2	In compliance	
	C.2.3	In compliance	
	C.2.4 (PR)	Not to be answered by monitors. The FLA is working on analysis of the situation based on real wage data collected during IEMs.	
	C.2.5 (PR)	In compliance	
	C.2.6 (PR)	In compliance	
Farmer/Producer Income	C.3	In compliance	
	C.4 (PR)	In compliance	
Wage Payment and Calculation	C.6	In compliance	
	C.7.1	Noncompliance	All Farms
	C.7.2	In compliance	
	C.7.3 (PR)	In Progress	All Farms
	C.7.4 (PR)	In Progress	All Farms
	C.7.5	In compliance	
	C.8.1	Noncompliance	All Farms
	C.8.2	In compliance	
	C.8.3	Noncompliance	All Farms
	C.8.4 (PR)	In compliance	
	C.9 (PR)	In compliance	
	C.10.1	In compliance	
	C.10.1.1	In compliance	
C.10.2	In compliance		
C.10.3	In compliance		

Workers Awareness	C.11.1.1	In compliance	
	C.11.1.2	In compliance	
	C.11.1.3	In compliance	
	C.11.1.4	In compliance	
	C.11.1.5	In compliance	
	C.13 (PR)	Not Initiated	All Farms
Fringe Benefits	C.12.1	In compliance	
	C.12.2 (PR)	Not Initiated	All Farms
	C.12.3	In compliance	
	C.12.4	In compliance	
	C.12.5	In compliance	

### Compensation Assessment Summary

General Compliance	
<p><b>Benchmarks:</b> C.1.2: Other than lawfully required deductions, no other deductions may be made from a worker's compensation without the written consent of the worker. Financial disciplinary measures are prohibited.</p>	
<b>Noncompliance in Farm 6 &amp; 7</b>	
<p><b>Findings/Noncompliance Explanation:</b></p>	<p>The labor contractors are representing workers. But also, workers this year have signed working agreements with the grower. The labor contractor, as an employment condition, is deducting a commission from workers as an intermediary fee (approx. 10%). The local regulation requires farmers to pay this commission to labor contractors separately. However, farmers make a total payment to labor contractors, which covers workers' wages, labor contractors' commission and supervisors' salaries (for some of the labor contractors). Hence labor contractors continue deducting their commission of 10 % from the daily wages, and the amount could even be higher since the payment system is not transparent.</p> <p><u>Source:</u> Documentation, Interview (Producers, Workers)</p>
Company Action Plan	
<p><b>Activity</b></p>	<p>Olam carries out activities by conducting the information on the subject simultaneously with multifaceted and comprehensive projects. In this context, Olam gives training and consultancy to the farmers who are in the position of the principal employer. It is reminded that the farmers are in the principal employer position and will be held responsible for the wage cuts that will occur. It will be ensured that the "Payroll Delivery Report" in the Sustainable Farmer Handbook distributed to the farmers will be signed.</p> <p>Consultancy will be given to labor contractors. Olam has directed 23 labor contractors within the scope of labor contractor training and certification work carried out in Şanlıurfa and Diyarbakır provinces in 2020. With these studies, it was ensured that one female labor contractor received a certificate. Trainings are given to agricultural intermediaries within the scope of the study:</p> <ul style="list-style-type: none"> <li>• Child Labor</li> <li>• Young Labor</li> <li>• Benefits of Registered Work</li> <li>• National Laws and Regulations</li> <li>• Occupational Health and Safety</li> </ul>

	<p>Social workers provide consultancy services to labor contractors that are documented as a result of training. Consulting service started in 2018 and continues. In this context, labor contractors are expected to charge the fee they deserve from the farmer, as required by law.</p> <p>The activities are carried out at the origin to inform and strengthen the seasonal agricultural workers, who are the most important and loss of rights. With the Women on The Roads for Hazelnut Project, efforts will be made to prevent the problem with education, information and orientation activities that will appeal to all segments, primarily women in 4 provinces (Mardin, Şanlıurfa, Diyarbakır, Şırnak).</p> <p>Within the scope of the Women on The Roads for Hazelnut Project, interviews will be organized to be broadcast on local TVs on the following topics:</p> <ul style="list-style-type: none"> <li>• Seasonal Agriculture and Workers Rights</li> <li>• Seasonal Agriculture and Child Labor</li> <li>• Seasonal Agriculture and Women's Rights</li> </ul> <p>With these interviews, Olam aims to increase public awareness.</p> <p>For the rights and sanctions that workers will demand as a result of the information provided, the seasonal agricultural labor contract must be signed first. With this perspective, the signing of the seasonal agricultural labor contract, which is a triple protocol, will be ensured.</p> <p>This year Olam will design the payroll form in a calendar style to keep workers' work records. With this calendar, workers will be able to get not only work records but also other notes on their work. It will add a "Payroll Delivery Record" to the end of the calendar and make the working records official.</p>
<p><b>Output indicators (targeted results)</b></p>	<p>2,500 farmers in Sakarya and Düzce provinces will be trained on wage cuts and formal employment.</p> <p>A Sustainable Farmer Handbook (document containing a Payroll delivery report) will be distributed to 1,257 farmers in Sakarya and Düzce provinces.</p> <p>900 women will be reached with 380 household visits.</p> <p>900 Turkish and Kurdish Fliers will be distributed.</p> <p>120 labor contractors will be consulted.</p> <p>It will be ensured that 120 seasonal agricultural labor contracts will be signed and 120 "Payroll Delivery Record" will be signed.</p> <p>The awareness of the public will be increased through the interviews to be made.</p> <p>Calendar will be distributed to 500 workers.</p>
<p><b>Timeline and Deadline Date</b></p>	<p>August 2019- December 2020 / December 2020</p>
<p><b>Input (budget/resources)</b></p>	<p>Four full time Olam social workers / four temporary social workers, training costs, calendar costs and cost of the farmer handbooks and annual cost of the Women on the Roads For Hazelnut project</p>
<p><b>Responsible staff (title/department)</b></p>	<p>Arif Fidan / Social Worker Esra Aysan / Social Worker</p>

<b>Minimum Wage/Fair Compensation</b>	
<b>Benchmarks:</b> <i>C.2.1: Employers shall pay workers at least the legal minimum wage, the prevailing industry sector wage, or the wage pursuant to Collective Bargaining Agreements that are in force, whichever is higher, for regular working hours (not including overtime). Hourly or daily compensation shall be calculated based on the basis of the legal minimal wage, the prevailing industry sector wage, or the wage pursuant to Collective Bargaining Agreements that are in force, whichever is higher. Workers should also be informed by the employer about the legal minimum wage applicable to them.</i>	<b>Noncompliance in all farms</b>
<b>Findings/Noncompliance Explanation:</b> <b>Words 24</b>	The labor contractor deducts a commission from workers as an intermediary fee (approx. 10%), when they do so, workers receive less than daily minimum wage.
<b>Company Action Plan</b>	
<b>Activity</b>	<p>A seasonal agricultural labor contract will be signed, which guarantees workers' rights. Necessary follow-ups will be made to fulfill the rights guaranteed by the contract. In this context, farmers, who are the main employers, will be trained on the subject. Labor contractors, who are in the leading role of the problem, will be given consultancy and training will be given at the origin for seasonal agricultural workers who are the victims of the problem. This study will be carried out within the scope of the Women on The Roads for Hazelnut Project.</p> <p>Within the scope of the Hazelnut's Traveler Women Project, interviews will be organized to be broadcast on local TVs on the following topics:</p> <ul style="list-style-type: none"> <li>• Seasonal Agriculture and Workers Rights</li> <li>• Seasonal Agriculture and Child Labor</li> <li>• Seasonal Agriculture and Women's Rights</li> </ul> <p>These interviews will increase the public awareness.</p> <p>Olam has added a report in the Sustainable Production Book, which it will distribute to the farmers, that the wages have been delivered. Olam put articles on equal pay for equal work, on which way the payment was made (by hand, by bank account, etc.) and how much in the minutes. Necessary works will be carried out to sign these minutes in the harvest period. On the other hand, the workers will be given a "Progida Follow-up Card", thereby enabling workers to keep track of their working days. In addition, a new study and additionally some of the follow-up cards will be published in agenda (calendar) style. It will be included in the "Wage Determination Minutes" and workers will sign it to formalize the wage they receive by signing this minute.</p> <p>Olam provides training and consultancy to labor contractors who play a key role in ensuring that wages comply with the law and take wages without the deprivation of workers' rights. In this context, it has certified 23 new labor contractors in 2020, and provided them to receive training on workers' rights, wage, registered work and legislation and started the consultancy process.</p>
<b>Output indicators (targeted results)</b>	<p>2,500 farmers will be trained on wages in the provinces of Sakarya and Düzce.</p> <p>A Sustainable Production Book (document containing a fee delivery report) will be distributed to 1,257 farmers in Sakarya and Düzce.</p> <p>900 women will be reached with 380 household visits.</p> <p>900 Turkish and Kurdish Fliers will be distributed.</p>

	<p>Consultancy will be provided to 120 labor contractors who bring workers to Sakarya and Düzce provinces.</p> <p>It will be ensured that 120 seasonal agricultural labor contracts will be signed and 120 "Payroll Delivery Record" will be signed.</p> <p>The awareness of the public will be increased through the interviews to be made.</p> <p>Calendar will be distributed to 500 workers.</p>
<b>Timeline and Deadline Date</b>	August 2019- December 2020 / December 2020
<b>Input (budget/resources)</b>	Four full time Olam social workers / four temporary social workers, training costs, calendar costs and cost of the farmer handbooks and annual cost of the Women on the Roads For Hazelnut project.
<b>Responsible staff (title/department)</b>	Arif Fidan / Social Worker Esra Aysan / Social Worker

<b>Wage Payment and Calculation</b>	
<p><b>Benchmarks:</b></p> <p><i>C.8.1: Employers shall compensate workers for all hours worked.</i></p> <p><i>C.8.3: Workers shall be informed in writing or orally where necessary, in language(s) spoken by workers, about overtime wage rates prior to undertaking overtime.</i></p>	
	<b>Noncompliance in all farms</b>
<b>Findings/Noncompliance Explanation:</b>	<p>Employers are not compensating overtime work. Workers are not informed in writing or orally where necessary about overtime wage rates prior to undertaking overtime. C.8.4 (PR) = The labor law defines overtime premium. For work carried out</p> <p><u>Source:</u> Interview (Producers, Workers)</p>
<b>Company Action Plan</b>	
<b>Activity</b>	<p>Prime Ministry Circular No. 2017/6, prepared within the framework of Labor Law No. 4857, is included in the "Sustainable Farmer Handbook" prepared by Olam to be distributed to farmers. During the year, relevant explanations and information are given in the training organized by Olam. Olam aims to ensure that the information it provides is permanent by developing educational techniques. On the other hand, it added a form called "Payroll Delivery Record" to the mentioned handbook to carry out the necessary follow-up. During the harvest, Olam will provide that farmers, workers and labor contractors sign and will track this form. The seasonal agricultural labor contract is also included, which is the first condition for employing workers in the hazelnut orchard. With the signing of the contracts, a sanction force is created to meet the requirements stipulated by the law. In line with this purpose, the signing of the contracts within the first and primary objectives will be ensured.</p> <p>To provide the necessary information to the seasonal agricultural workers training will be organized at the origin with the Women on The Roads for Hazelnut Project. To keep the information permanent, fliers in Turkish and Kurdish will be distributed.</p> <p>During the harvest period, interviews will be organized to be broadcast on local</p>

	<p>TVs on the following topics:</p> <ul style="list-style-type: none"> <li>• Seasonal Agriculture and Workers Rights</li> <li>• Seasonal Agriculture and Child Labor</li> <li>• Seasonal Agriculture and Women's Rights</li> </ul> <p>The public awareness of these interviews is aimed at increasing awareness.</p>
<b>Output indicators (targeted results)</b>	<p>2,500 farmers in Sakarya and Düzce provinces will be trained in overtime and remuneration issues.</p> <p>A Sustainable Production Book (document containing a wage delivery report) will be distributed to 1,257 farmers in Sakarya and Düzce provinces.</p> <p>900 women will be reached with 380 household visits.</p> <p>900 Turkish and Kurdish fliers will be distributed.</p> <p>It will be ensured that 120 seasonal agricultural contracts will be signed and 120 "Payroll Delivery Record" will be signed.</p> <p>Interviews will increase public awareness.</p>
<b>Timeline and Deadline Date</b>	August 2019- December 2020 / December 2020
<b>Input (budget/resources)</b>	Four full time Olam social workers / four temporary social workers, training costs, and cost of the farmer and worker handbooks and annual cost of the Women on the Roads For Hazelnut project
<b>Responsible staff (title/department)</b>	Arif Fidan / Social Worker Esra Aysan / Social Worker

## Overview - Farms vs. Noncompliance

Total number of Farms: 7

	Employment Relationship	Non-discrimination	Harassment or Abuse	Forced Labor	Child Labor	Freedom of Association and Collective Bargaining	Health, Safety and Environment	Hours of Work	Compensation	Total
<b>% of farms with noncompliances or risk of noncompliances</b>	100%	0%	0%	100%	100%	0%	0%	1000%	100%	
Farm No. 1	13	0	0	1	3	0	0	8	3	28
Farm No. 2	13	0	0	1	1	0	0	8	3	26
Farm No. 3	13	0	0	1	1	0	0	8	3	26
Farm No. 4	13	0	0	1	1	0	0	8	3	26
Farm No. 5	13	0	0	1	1	0	0	8	3	26
Farm No. 6	14	0	0	1	1	0	0	8	4	28
Farm No. 7	15	0	0	1	1	0	0	8	4	29
<b>TOTAL</b>	<b>94</b>	<b>0</b>	<b>0</b>	<b>7</b>	<b>9</b>	<b>0</b>	<b>0</b>	<b>56</b>	<b>23</b>	<b>189</b>