



[2021]

## FAIR LABOR ASSOCIATION INDEPENDENT EXTERNAL MONITORING AGRICULTURAL REPORT

**Company:** Sabırlar Fındık İhracat Ltd. Sti.

**Country:** Turkey

**Crop:** Hazelnuts

**Production Process:** Harvest

**Assessment Location:** Ordu, Ünye

**Monitor:** Ozgur Tulumbaci & Tugba Ocek from Asya Control  
Certifications & Consultancy

**Assessment Dates:** August 18 - 21, 2021

**Number of assessed farms:** 15

**Total area covered (ha):** 128.44

**Number of farmers interviewed:** 15

**Total number of workers:** 112

**Number of workers interviewed:** 94

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

Human Resource Management System	ER.1.1	Risk of Noncompliance	Farms 3,4,6,7,8,10,12,13,14 & 15
	ER.2.1 (PR)	In progress	All farms
	ER.2.1.1 (PR)	In progress	All farms
Recruitment and Hiring	ER.3.1	Risk of Noncompliance	All farms
	ER.3.1.1	Noncompliance	All farms
	ER.3.1.2	Noncompliance	All farms
	ER.4	Risk of Noncompliance	Farms 1,2,6,7,9,10 & 11
	ER.5.1	Noncompliance	Farms 1,2,6,7,9,10 & 11
	ER.5.2	Noncompliance	Farms 1,2,6,7,9,10 & 11
	ER.5.3	In Compliance	All farms
	ER.6 (PR)	In progress	All farms
	ER.7.1	In Compliance	All farms
	ER.7.2	In Compliance	All farms
	ER.7.3	In Compliance	All farms
	ER.7.4	In Compliance	All farms
	ER.7.5	In Compliance	All farms
	ER.7.6	Noncompliance	Farm 1,2,6,7,9,10 & 11
	ER.7.7	Not Applicable	All farms
ER.7.8	Not Applicable	All farms	
Terms and Conditions	ER.9.1	Risk of Noncompliance	All farms
	ER.9.2.1	Risk of Noncompliance	All farms
	ER.9.2.2	Not Applicable	All farms
	ER.9.2.3	Noncompliance	All farms
	ER.9.3.1	In Compliance	All farms
	ER.9.3.2	In Compliance	All farms
	ER.9.3.3	In Compliance	All farms
	ER.10	Not Applicable	All farms
	ER.11	Noncompliance	All farms
	ER.12.1	Risk of Noncompliance	All farms
	ER.12.1.1	Risk of Noncompliance	Farms 1,3,4,6,8,9,10,11,12,13,14 & 15
	ER.12.2	Not Applicable	All farms
	ER.13.1	Risk of Noncompliance	All farms
	ER.13.2 (PR)	In progress	All farms
ER.13.3 (PR)	In progress	All farms	
Administration	ER.15.1	In Compliance	All farms
	ER.15.2	In Compliance	All farms
	ER.15.2.1	Noncompliance	All farms
	ER.16.1	In Compliance	All farms
	ER.16.2	In Compliance	All farms
	ER.17.2 (PR)	Not initiated	All farms
	ER.17.3 (PR)	Not initiated	All farms
	ER.17.4 (PR)	Not Applicable	All farms
Worker Involvement	ER.18.1	In Compliance	All farms
	ER.18.2 (PR)	Not Applicable	All farms
Right to Organize and Bargain	ER.19	Not Applicable	All farms
Work Rules and Discipline	ER.20.1	Noncompliance	All farms
	ER.20.2	Noncompliance	All farms
	ER.20.3 (PR)	Not initiated	All farms

	ER.20.4	Noncompliance	All farms
	ER.20.6	Noncompliance	All farms
	ER.20.7	Noncompliance	All farms
	ER.20.8	Noncompliance	All farms
	ER.20.9 (PR)	Not initiated	All farms
	ER.20.11	Noncompliance	All farms
Access to Training for Family Members	ER.21	Risk of Noncompliance	All farms
HSE Management System	ER.24.1.	Risk of Noncompliance	All farms
	ER.24.2 (PR)	In Compliance	All farms
	ER.24.3	In Compliance	All farms
	ER.24.4.1 (PR)	In progress	All farms
	ER.24.4.2 (PR)	In progress	All farms
	ER.24.4.3 (PR)	In progress	All farms
	ER.24.4.4 (PR)	In progress	All farms
	ER.24.4.5 (PR)	In progress	All farms
	ER.24.4.6 (PR)	In progress	All farms
	ER.24.5 (PR)	In progress	All farms
Grievance Procedures	ER.25.1 (PR)	Not initiated	All farms
	ER.25.2 (PR)	Not initiated	All farms
	ER.25.3	In Compliance	All farms
	ER.25.4	Risk of Noncompliance	Farms 3,4,8,11,12,13,14 &15

**Notable Feature:**

The affiliated company started cancer screening activities in collaboration with local health authorities for female workers. Female workers said that they are very happy with this implementation. The affiliated company distributes mini-packs to workers, with masks, gloves, hats and hygiene tools in it.

**Employment Relationship Assessment Summary**

Human Resource Management System	
<p><b>Benchmarks:</b></p> <p><i>ER.1.1: Employer shall have written terms and conditions of employment, job descriptions, rules of compensation, and working hours for all positions. In the case of workplaces with informal labor structures, employers should be able to describe verbally all of the above terms and conditions and clearly communicate them to workers.</i></p>	<p><b>Risk of Noncompliance in farms 3,4,6,7,8,10, 12,13,14, and 15</b></p>
<p><b>Findings/Noncompliance Explanation:</b></p> <p>The assessors have found out that there are written agreements on 5 farms (farms 1,2,5,9 &amp; 11). The terms and conditions of employment, job description and compensation were mentioned in these written contracts. However, the rest of the farms have verbal agreements. Workers on every farm knew the working hours and they were aware of the daily wages on farms 1, 4, 5, 6, 10, 12, 13, 14 and 15.</p> <p>Source: Documentation, interviews &amp; observation</p>	
<p><b>Company Action Plan:</b></p>	
<p><b>Activity</b></p>	<p>The number of written agreements between farmers, workers and intermediaries will be increased. Written contracts will be placed in farmer handbooks and distributed to all farmers. Training will be given to labor contractors, workers and farmers on the importance of contract work.</p>

	Within the scope of Harvesting the Future Project, there is a mapping activity of labor contractors. As an actor in this project, we mapped 20 labor contractors and ensured that they received a labor contractor certificate. Thus, it will be ensured that contracted work becomes widespread.
<b>Output indicators (targeted results)</b>	1-The number of written contracts will increase, at least 15 contracts will be signed in August 2022. 2-Awareness will be created among farmers, labor contractors and workers. Training will be given to 25 labor contractors, 700 workers and 100 farmers until September 2022. 3-Labor contractors will be provided with a labor contractor certificate. In March 2022, training will be delivered to 4 new labor contractors, and it will be ensured that they receive their certificates.
<b>Timeline and Deadline Date</b>	1- August 2022 2-September 2022 3-March 2022
<b>Input (budget/resources)</b>	One full-time social worker, one temporary social worker training costs and cost of the farmer handbooks and labor contractor certificate cost.
<b>Responsible staff (title/department)</b>	Emine ANKARALI (sustainability and social compliance manager)

<b>Recruitment and Hiring</b>	
<b>Benchmarks:</b> <i>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.</i>	<b>Risk of Noncompliance in all farms</b>
<i>ER.4: Employers shall not use employment agencies/labor contractors that rely on any practice that is linked to: using false information to recruit workers; restricting workers' freedom of movement; requiring workers to pay recruitment and/or employment fees; withholding from workers a copy of their employment contract in their native language that sets forth the general terms and conditions of engagement and employment; retaining possession or control of workers identification and other documents like passports, identity papers, work permits, and other personal legal documents; punishing workers for terminating employment.</i>	<b>Risk of Noncompliance in farms 1,2,6,7,9, 10, and 11</b>
<i>ER.5.1: No worker hired by an employment agency, or a labor 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.</i> <i>ER.5.2: Fees associated with the employment of workers shall be the sole responsibility of employers. No worker hired via an employment agency, or a labor contractor shall pay a fee or get a reduction by applying a fee over his salary.</i> <i>ER.7.5: Employers may hire temporary, casual, daily, seasonal or migrant workers only when: work that needs to be done and is outside the professional expertise of the permanent workforce;</i>	<b>Noncompliance in farms 1,2,6,7,9, 10, and 11</b>
<i>ER.3.1.1: Employers shall take reasonable measures to ensure such documentation is complete and accurate.</i> <i>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.</i>	<b>Noncompliance in all farms</b>
<b>Findings/Noncompliance Explanation:</b>	<p>There is no practice for age verification. The IDs of the seasonal migrant workers are taken to the gendarme for security purposes by muhtar, the farmer himself or the staff of the affiliated company. The age documentation is based upon a verbal statement of the workers, supervisors or labor contractors. They informed the monitors that they do not need an age verification mechanism since they are all relatives, and they know each other. Besides this year the monitor found that all the workers' statements about their birth year being 2003 or above. When the monitors were observed in detail, they found out that their statement about their birth year is not true. As a result of this, workers between 15 and 18 and workers under 15 were detected during farm visits. The farmers must check the IDs and keep a copy when collected to deliver to the gendarme or muhtar and avoid employing any child labor based on the age verification.</p> <p>There is a wage deduction implemented in the name of a recruitment fee by the labor contractor. This deduction is present in 7 farms out of 8 farms that employ seasonal migrant workers. It has been observed that workers were not aware of the amount of the deduction. It was 10-15 TL on farm 1, 10 TL on farm 10 and the rest is 10%.</p>

	<p>Seasonal migrant worker groups working with labor contractors are paid 10 % below the specified minimum wage.</p> <p>Basic labor rights such as social security and holiday leave/payment have not been implemented. Farmers and workers note that there is no holiday, as it is temporary and periodic work. If the weather permits, they work every day of the week until the harvest is finished. The Company and farmers should perform collective work to improve these labor rights.</p> <p>There is no permanent work on the farm, hence the farmer does not need to employ any permanent workers, according to the farmers and workers.</p> <p>Source: Interviews &amp; observation</p>
<b>Company Action Plan:</b>	
<b>Activity</b>	<p>The company will prepare a procedural system for age verification. In this prepared procedure, how to make age verification and how to follow a path will be explained. In line with this procedure, all farmers will be given training on age verification. The content of farmer training sessions will be revised in the 2022 season.</p> <p>It is very common practice for labor contractors to cut 10%. To prevent this, the company will find and map uncertificated labor contractors in our harvest time supply chain. As a result of these mapping studies, they will organize training for worker contractors in March and ensure that uncertificated labor contractors receive certificates through İŞKUR. In line with these practices and training, they aim to avoid 10% cuts and thus not fall below the determined minimum wage. In this direction, training covering this subject will be given to 25 labor contractors. At the same time, the farmer training module will be updated and all farmers will be provided with training that makes a separate payment requirement for labor contractors.</p> <p>Since it is temporary and periodical work, there are no practices such as week vacation or annual leave, holiday leave/wage, because the number of days the workers work in each farm varies. Lobbying activities will be carried out through meetings with other stakeholders (institutions such as district governorship, municipality, governorship).</p>
<b>Output indicators (targeted results)</b>	<p>1- The procedure will be created and will include instructions for age verification by June 2022.</p> <p>2- The farmer training module will be revised by June 2022.</p> <p>3- Awareness will be created among farmers by delivering training to at least 100 farmers until September 2022.</p> <p>4- Trainings will be delivered to 25 labor contractors on this subject by August 2022.</p> <p>5- The number of written contracts will increase, at least 15 contracts will be signed in August 2022.</p>
<b>Timeline and Deadline Date</b>	<p>1-June 2022</p> <p>2- June 2022</p> <p>3-September 2022</p> <p>4- August 2022</p> <p>5-August 2022</p>
<b>Input (budget/resources)</b>	<p>One full-time social worker, one temporary social worker training costs and cost of the farmer handbooks and labor contractor certificate cost.</p>
<b>Responsible staff (title/department)</b>	<p>Emine ANKARALI (sustainability and social compliance manager)</p>

**Terms and Conditions**

<p><b>Benchmarks:</b></p> <p><b>ER.9.1:</b> Workers should be made aware of the employment terms under which they are engaged.</p> <p><b>ER.9.2:</b> Employment terms shall be those to which the worker has voluntarily agreed, provided those terms do not fall below:</p> <p><b>ER.9.2.1:</b> provisions of national laws;</p> <p><b>ER.11:</b> Employers shall ensure that all legally mandated requirements for the protection or management of special categories of workers, including migrant, juvenile, contract/contingent/temporary, casual, daily, home workers, pregnant or disabled workers, are implemented.</p> <p><b>ER.12.1:</b> 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.</p> <p><b>ER.13.1:</b> Farmer, sharecropper or any kind of supervisor who is leading workers shall have knowledge of the local labor laws and the FLA Code.</p>	<p><b>Risk of Noncompliance in all farms</b></p>
<p><b>ER.12.1.1:</b> Employers shall inform workers that any form of harassment or abuse in the workplace shall be subject to disciplinary measures.</p>	<p><b>Risk of Noncompliance in farms 1,2,3,4,6,7,8,9, 10,11,12,13,14, and 15</b></p>
<p><b>ER.9.2.3:</b> Employment terms shall be those to which the worker has voluntarily agreed, provided those terms do not fall below: the FLA Workplace Code.</p>	<p><b>Noncompliance in all farms</b></p>
<p><b>Findings/Noncompliance Explanation:</b></p>	<p>On all farms, workers were aware of the working hours. However, on 6 farms workers were not aware of daily wages (farms 2, 3, 4, 9, 10 and 12). The workers who were aware of the daily wages were not all informed by the farmer or labor contractor about wages, but they had heard about the wages from other sources.</p> <p>The monitors understood that working hours are longer than stated in the national legislation. 6 worker groups were informed they were working between 07.00-06.00 (farms 1, 2, 5, 7, 10 and 11). 3 of these groups had 2 hours breaks and the other 3 had 1.5 hours breaks. At 8 farms (farms 3, 4, 6,8, 9, 12 and 14) the working hours were between 08.00-06.00 and they had 2 hours breaks. Working hours were between 09.00-06.00 at 1 farm (farm 14) with an hour and 15 minutes break.</p> <p>Farmers in general were found aware of the rights of the disadvantaged groups. However, monitors detected 2 nursing workers working at the accommodation site and 1 pregnant woman and young workers working on 7 farms.</p> <p>The monitors understood that the participating company had organized awareness-raising activities both for farmers and workers. However, the monitors found the awareness of both farmers and workers on limited levels. Some farmers (farms 1, 5 and 15) had awareness about working hours, health and safety. In some cases, both the farmer and the participating company had organized training activities (such as at farms 1, 2, 5, 6, 9, 10, 11 and 12). Still, when the monitors interviewed these groups, one worker group stated that they had some kind of training but could not remember the themes, and another worker group mentioned that they only were aware of health-related issues. The training activities are carried out during harvest time and target the workers who move from one place to another. As a result of this and COVID restrictions, the company had difficulty reaching all of the workers and workers who are reached do not listen carefully or do not keep the training in mind.</p> <p>A farmer or any kind of supervisor leads to workers having only partial knowledge of the local labor laws and the FLA Code. Both farmers and supervisors know that they cannot employ workers under 18 years. Some knew about the legal rules of working hours. Some of the supervisors said that they work 8 hours a day. The monitor found that the statements of the workers were different. The monitors cross-checked and found out that the workers who know the regulations about child labor mentioned that they are 18 years old and born in 2003. The monitors finally found out the workers were below the legal minimum working age by cross-checking their first statement later in the interview with</p>

	<p>them and with their siblings and other family members. As a result, this monitor found out that they tried to hide their age. In addition, these farmers do not have detailed knowledge about other issues related to FLA benchmarks, such as discrimination, harassment, disciplinary procedures, etc.</p> <p>The monitors observed posters named “The rules to be followed in agricultural areas” on some farms and villages. These posters had information regarding disposal of pesticides, environment, emergency numbers and social policies, legal working age, discrimination/harassment, freedom, forced labor, compensation and social rights of the workers. Although these subjects are not explained in detail to the workers, the posters are informative about workplace rules.</p> <p>None of the employers have informed workers about any form of harassment/abuse in the workplace and that these kinds of acts are subject to disciplinary measures. The company itself conducted raising awareness activities on the farms. Worker groups in farms 2 and 7 stated that they are informed about those issues. Workers on all farms except for farm 5 said that they do not know or remember anything related to harassment, abuse and disciplinary measures.</p>
<b>Company Action Plan:</b>	
<b>Activity</b>	<p>The decision of the commission will be disseminated in Ordu/Ünye. The commission decision will be announced to all workers and farmers before the hazelnut harvest begins. Thus, all workers will be aware of the wage they will receive before starting work. At the same time, it will be stated that they tell the price in advance in the farmer training.</p> <p>Practices and laws regarding working hours, permits, and rest periods will be announced to workers and farmers. The training module will be updated. Working hours will be added to the contracts. Contracts will be placed in each farmer's handbook and distributed.</p> <p>Issues such as FLA codes, discrimination, harassment or occupational health and safety are given to all workers. 944 workers were trained in March and August 2021, but as workers are just learning this information, familiarity with these concepts will increase over time. Training modules are updated so that workers can better understand the training.</p>
<b>Output indicators (targeted results)</b>	<p>1- The commission decision will be announced through training, WhatsApp groups and a mass message system by August 2022.</p> <p>2- Farmer and worker training modules will be updated by June 2022.</p> <p>3- 100 farmers and 700 workers will be trained by August 2022 in Ünye.</p> <p>4- Please see the above section for contracts related targets.</p>
<b>Timeline and Deadline Date</b>	<p>1-August 2022</p> <p>2-June 2022</p> <p>3-August 2022</p> <p>4-Please see above</p>
<b>Input (budget/resources)</b>	<p>One full-time social worker, one temporary social worker's training costs and the cost of the farmer handbooks.</p>
<b>Responsible staff (title/department)</b>	<p>Emine ANKARALI (sustainability and social compliance manager)</p>

<b>Administration</b>	
<p><b>Benchmarks:</b></p> <p><b>ER.15.2.1:</b> 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).</p>	<b>Noncompliance on all farms</b>

<b>Findings/Noncompliance Explanation:</b>	The monitors noticed advance payments in 2 worker groups (farm 2 & 11). There is no written standard for advance payments. It is received and paid back on verbal agreements. The Company, farmers and labor contractors should work on having standards for advance payments of seasonal workers and communicate these during training. A worker who agrees to work may demand an advance payment for their needs at home or on the farms or to travel to the region. Interest is not applied to these payments. The advance is deducted from the total wages at the end of the job, or the workers pay back the advance from the salary they earned. Monitors understood that the advance payment has no sanctioning power on workers.  Source: Interviews & observation
<b>Company Action Plan:</b>	
<b>Activity</b>	When farmers make advance payments to workers, a signed form will be prepared to verify this. This form will be added to the updated training module and training will be given to workers and farmers. This form will be added to all farmer handbooks and distributed to all farmers. In this direction, training will be given to 25 agricultural labor intermediaries, 700 workers and 100 farmers until September 2022.
<b>Output indicators (targeted results)</b>	1-The form will be created and added to updated training modules, farmer handbooks by July 2022. 2-Trainings will be delivered to farmers, workers and labor contractors. Please see above for the targets.
<b>Timeline and Deadline Date</b>	1-July 2022 2-Please see above
<b>Input (budget/resources)</b>	One full-time social worker, one temporary social worker's training costs and the cost of the farmer handbooks.
<b>Responsible staff (title/department)</b>	Emine ANKARALI (sustainability and social compliance manager)

## Work Rules and Discipline

### Benchmarks:

**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).

**ER.20.2:** Any person supervising workers shall be aware of the disciplinary rules and practices.

**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.

**ER.20.6:** Disciplinary rules and practices shall be clearly communicated to all workers.

**ER.20.7:** Workers must be informed when a disciplinary procedure has been initiated against them.

**ER.20.8:** Workers have the right to participate and be heard in any disciplinary procedure against them.

**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.

**Noncompliance  
in all farms**

<b>Findings/Noncompliance Explanation:</b>	There are no disciplinary rules or practices at the farm level. The monitors did not detect any written or verbal standards of the discipline system. The Company, farmers and labor contractors should work on having discipline rules for seasonal workers and communicate these during training, to avoid unfair and disproportionate implementations.  Source: Interviews & observation
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### Company Action Plan:

<b>Activity</b>	A procedure regarding the Disciplinary Rules will be established. The disciplinary procedure prepared will be added to the farmer's handbook and distributed to all farmers (minimum of 100 farmers). 100
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	farmers in Ünye district between June and August; At least 700 workers will be trained in Ünye in August. It will be added to the worker and farmer training module.
<b>Output indicators (targeted results)</b>	The procedure will be created by June 2022. Disciplinary rules will be added to the training module by June 2022 in Ordu/Ünye. Awareness will be created among farmers and workers with training by August 2022.
<b>Timeline and Deadline Date</b>	1-2022 June 2-2022 June 3-2022 August
<b>Input (budget/resources)</b>	One full-time social worker, one temporary social worker's training costs and the cost of the farmer handbooks.
<b>Responsible staff (title/department)</b>	Emine ANKARALI (sustainability and social compliance manager)

<b>Access to Training for Family Members</b>	
<b>Benchmarks:</b> <i>ER.21: Family members (spouses and adult children) involved directly or indirectly in agriculture production shall have access to all training and awareness-raising activities conducted for the workers and growers on the farms.</i>	<b>Risk of Noncompliance in all farms</b>
<b>Findings/Noncompliance Explanation:</b>	The monitors reported that the Company has performed face-to-face training at farmers' houses for farmers and their family members including farmers' wives. Monitors understood from interviews with farmers, workers and their family members that farmers and workers, and farmers' family members such as sons of farmers who actively help their fathers on a farm, participate in the training, while the family members of farmers such as wives who do not participate in decision making participate at lower rates in training and awareness-raising activities.  Source: Interviews & observation
<b>Company Action Plan:</b>	
<b>Activity</b>	The participation rate of the families of the farmers in the agricultural and social training will be increased. At least one family member of each farmer will be included in the training.
<b>Output indicators (targeted results)</b>	Awareness will be created among farmers' family members.
<b>Timeline and Deadline Date</b>	2022 August
<b>Input (budget/resources)</b>	Two full-time agricultural engineers and one full-time social worker, one temporary social worker's training costs.
<b>Responsible staff (title/department)</b>	Emine ANKARALI (sustainability and social compliance manager) Büyüamin SİVRİ (agricultural engineer) Serkan TANRIVERMİŞ (agricultural engineer)

## HSE Management System

<b>Benchmarks:</b> <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>		<b>Risk of Noncompliance in all farms</b>
<b>Findings/Noncompliance Explanation:</b>	<p>HSE rules are communicated to workers either by the affiliated company staff, the farmer or the supervisor. On farms 1, 2, 9,10, 11 and 12 the monitors found out that the communication was carried out by the employees of the affiliated company. However, the workers mainly remember health and hygiene-related issues and COVID-19 warnings. However, women were especially interested in the cancer screening activity of the affiliated company. On farms 3, 4, 5 and 15 the supervisors provided communication with the HSE issues. However, when the content of the HSE was asked to the workers, it has been found that health and safety rules were told but nothing about environmental issues. Moreover, there are some workers, especially females, who have difficulty in understanding Turkish. They speak either Kurdish or Arabic. They said that their relatives translated communications.</p> <p>Source: Interviews &amp; observation</p>	
<b>Company Action Plan:</b>		
<b>Activity</b>	<p>Environmental issues will be included in the training. Worker and farmer training modules will be updated and environmental practices will be included.</p> <p>The company will ensure that at least one person (preferably a labor contractor) who speaks Kurdish or Arabic is with them while conducting the training. Before the training, they will ask the workers if they want translations, and they will provide training according to their language preference.</p>	
<b>Output indicators (targeted results)</b>	<p>Awareness will be created among farmers and workers. Environmental training will be provided to at least 8 villages and 100 farmers and their families in the Ünye district throughout the year, and to at least 700 workers in March and August.</p> <p>A language translation option will be added to the training content.</p>	
<b>Timeline and Deadline Date</b>	<p>1-August 2022 2-February 2022</p>	
<b>Input (budget/resources)</b>	<p>Two full-time agricultural engineers and one full-time social worker, one temporary social worker's training costs.</p>	
<b>Responsible staff (title/department)</b>	<p>Emine ANKARALI (sustainability and social compliance manager) Bünyamin SİVRİ (agricultural engineer) Serkan TANRIVERMİŞ (agricultural engineer)</p>	

<b>Grievance Procedures</b>		
<b>Benchmarks:</b> <i>ER.25.4: The company shall create awareness of this communication and non-compliance reporting mechanism to its service providers and suppliers.</i>		<b>Risk of Noncompliance in farms 3,4,8, 11,12,13,14, and 15</b>
<b>Findings/Noncompliance Explanation:</b>	<p>The affiliated company created grievance mechanisms, such as a hotline, phone numbers of related employees, mail and messages through websites. During the field visits, it has been observed that the company has created some degree of awareness about its grievance mechanism, especially about the hotline and numbers of the employees. Some of the workers remember only the mechanism from the previous year. However, it has also been noted that on some farms only supervisors know the hotline number. Moreover, it has also been observed that some of the workers said that they may use a hotline in the case of grievance whereas some said that they apply traditional mechanisms to</p>	

	<p>supervisors, growers or labor contractors or public institutions. Some worker groups said that they go directly to their hometown if they encounter a problem.</p> <p>Source: Interviews &amp; observation</p>
<b>Company Action Plan:</b>	
<b>Activity</b>	<p>To encourage the active use of the grievance mechanism, Sabırlar Complaint Line posters will be made and hung in the places where the workers stay.</p> <p>Training on grievance mechanisms will be given to at least 100 farmers in Ünye district, at least 700 workers in Şanlıurfa province in March and Ünye in August.</p> <p>Complaint notification forms will be placed in the farmer's handbook and distributed to all farmers.</p>
<b>Output indicators (targeted results)</b>	<p>The complaint line will be made visible. Posters will be made. 25 posters will be hung in at least 8 villages in the Ünye district.</p> <p>Awareness will be created among farmers and workers. Training on grievance mechanisms will be given to at least 100 farmers in Ünye district, at least 700 workers in Şanlıurfa province in March and Ünye in August.</p>
<b>Timeline and Deadline Date</b>	<p>1-2022 August</p> <p>2-2022 August</p> <p>3-2022 July</p>
<b>Input (budget/resources)</b>	Two full-time agricultural engineers and one full-time social worker, one temporary social worker's training costs and cost of the farmer handbooks and poster cost.
<b>Responsible staff (title/department)</b>	<p>Emine ANKARALI (sustainability and social compliance manager)</p> <p>Bünyamin SİVRİ (agricultural engineer)</p> <p>Serkan TANRIVERMİŞ (agricultural engineer)</p>

## Non-discrimination

### Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	ND. 1	Noncompliance	All farms
Recruitment and Employment Practices	ND.2.1	In Compliance	All farms
	ND.2.3	Noncompliance	All farms
Compensation Discrimination	ND. 3	Noncompliance	All farms
Discrimination in Training and Communication	ND. 4	Risk of Noncompliance	All farms
Marital or Pregnancy-Related Discrimination	ND.5.1	In Compliance	All farms
	ND.5.2	In Compliance	All Farms
	ND.5.3	In Compliance	All farms
	ND.6.1	Risk of Noncompliance	Farm 14
	ND.6.1.1	Risk of Noncompliance	Farm 14
Health-Related Discrimination	ND. 7	Not Applicable	All farms
	ND.8	Not Applicable	All farms
	ND. 9	Not Applicable	All farms

Respect of Culture and Religion	ND.11	Risk of Noncompliance	Farm 2
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### Non-Discrimination Assessment Summary

General Compliance	
<p><b>Benchmarks:</b>  <i>ND.1: Employers shall comply with all national laws, regulations and procedures concerning non-discrimination.</i></p>	
<b>Noncompliance in all farms</b>	
<p><b>Findings/Noncompliance Explanation:</b></p>	<p>Employers do not know any local laws, regulations or judicial processes related to nondiscrimination. Monitors detected discrimination regarding wages between local and migrant workers. The farmers reported that they will pay the seasonal migrant workers 120 TL while local workers will earn about 150-160 TL for the same job.</p> <p>Source: Documentation, interview &amp; observations</p>
<b>Company Action Plan:</b>	
<p><b>Activity</b></p>	<p>Legal provisions and laws regarding discrimination will be explained in more detail in all training.            A garden-level procedure/policy regarding discrimination will be established.            To prevent the wage gap between the workers, the decision of the commission will be announced to the farmers, and training will be given to raise awareness of the issue.</p>
<p><b>Output indicators (targeted results)</b></p>	<p>1-Awareness will be created among farmers and workers. 100 farmers and 700 workers will be trained by August 2022 in Ünye.            2-The procedure will be created.            3- The commission decision will be announced through training, WhatsApp groups and a mass message system by August 2022.</p>
<p><b>Timeline and Deadline Date</b></p>	<p>1-August 2022            2-June 2022            3-August 2022</p>
<p><b>Input (budget/resources)</b></p>	<p>Two full-time agricultural engineers and one full-time social worker, one temporary social worker's training costs.</p>
<p><b>Responsible staff (title/department)</b></p>	<p>Emine ANKARALI (sustainability and social compliance manager)            Bünyamin SİVRİ (agricultural engineer)            Serkan TANRIVERMİŞ (agricultural engineer)</p>

Recruitment and Employment Practices	
<p><b>Benchmarks:</b>  <i>ND.2.2: Employment policies and practices, including job advertisements, job descriptions, and job performance/evaluation policies and practices shall be free from any type of discriminatory bias.</i>  <i>ND.2.3: If not provided by law, employers must provide protection to workers who allege any type of discrimination in recruitment and employment practices.</i></p>	
<b>Noncompliance in all farms</b>	
<p><b>Findings/Noncompliance Explanation:</b></p>	<p>Despite the various initiatives of the Company on awareness-raising training to prevent discrimination and the fact that farmers and workers reported during interviews that there were no discrimination practices in recruitment, the farmers and labor contractors have no non-discrimination policies present or implemented and they were found not familiar with the concept of non-discrimination, which is having a risk of leading to discriminative</p>

	<p>implementations such as lower wages or longer working hours for migrant seasonal workers.</p> <p>Source: Interview &amp; observations</p>
<b>Company Action Plan:</b>	
<b>Activity</b>	<p>A discrimination policy and procedure will be established at the field level to prevent discriminatory practices in the field.</p> <p>The worker and farmer training module will be updated. Discrimination training included in the training module will be provided to at least 700 workers in March and August, and at least 100 farmers in July and August throughout the year.</p> <p>Legal provisions and laws regarding discrimination will be explained in more detail in all training.</p>
<b>Output indicators (targeted results)</b>	<p>Awareness will be created among farmers and workers. Discrimination training included in the training module will be provided to at least 700 workers in March and August, and at least 100 farmers in July and August throughout the year.</p> <p>The procedure will be created.</p>
<b>Timeline and Deadline Date</b>	<p>1-2022 August</p> <p>2-2022 June</p>
<b>Input (budget/resources)</b>	One full-time social worker, one temporary social worker's training costs.
<b>Responsible staff (title/department)</b>	Emine ANKARALI (sustainability and social compliance manager)

<b>Compensation Discrimination</b>	
<b>Benchmarks:</b>	<i>ND.3: There shall be no differences in compensation for workers performing equal work or work of equal value based on gender, race, religion, age, disability, sexual orientation, nationality, political opinion, social group, ethnic origin, employment status (e.g., local workers vs. migrant workers), or membership in unions or other workers' representative bodies.</i>
	<b>Risk of Noncompliance in all farms</b>
<b>Findings/Noncompliance Explanation:</b>	<p>The monitors detected discrimination practices in terms of compensation during assessments. The seasonal migrant workers are paid 120 TL whereas local groups are paid 150-160 TL for the same harvesting work. The difference between the wages could not be justified by the fact that farmers provide accommodation and utilities and pay a wage to the cook of the migrant worker groups.</p> <p>Source: Documentation, interview &amp; observations</p>
<b>Company Action Plan:</b>	
<b>Activity</b>	<p>Legal provisions and laws regarding discrimination will be explained in more detail in all training.</p> <p>A garden-level procedure/policy regarding discrimination will be established.</p> <p>To prevent the wage gap between the workers, the decision of the commission will be announced to the farmers, and training will be given to raise awareness of the issue.</p>
<b>Output indicators (targeted results)</b>	<p>1- Awareness will be created among farmers and workers. 100 farmers and 700 workers will be trained by August 2022 in Ünye.</p> <p>2- The procedure will be created.</p>

	3- The commission decision will be announced through training, WhatsApp groups and a mass message system by August 2022.
<b>Timeline and Deadline Date</b>	1-August 2022 2-June 2022 3-August 2022
<b>Input (budget/resources)</b>	One full-time social worker and one temporary social worker's training costs.
<b>Responsible staff (title/department)</b>	Emine ANKARALI (sustainability and social compliance manager)

<b>Discrimination in Training and Communication</b>	
<p><b>Benchmarks:</b></p> <p><i>ND.4: Employers shall guarantee that all workers have equal access to training and capacity building and no discrimination takes place based on the characteristics noted above, nor on the literacy or location of the workers. Training and communication should be given in the native language accessible to workers.</i></p>	<p><b>Risk of Noncompliance on all farms</b></p>
<p><b>Findings/Noncompliance Explanation:</b></p> <p>There is no purposeful exclusion from the training or communication for any workers. On the other hand, due to the language of the training and communications which are in Turkish language, workers having difficulties in understanding or reading Turkish or illiterate workers could face difficulties in getting the message. There are Kurdish and Arabic workers to whom the training is translated by their family members or relatives.</p> <p>Source: Interview &amp; observations</p>	
<b>Company Action Plan:</b>	
<b>Activity</b>	Sabırlar will ensure that at least one person (preferably labor contractors) who speaks Kurdish or Arabic is with us while conducting our training. Before the training, the team will ask the workers if they want translations, and they will provide training according to their language preference.
<b>Output indicators (targeted results)</b>	Trainer guidelines will be revised to include steps for assessing and meeting translation needs. Translator information will be added to attendance sheets.
<b>Timeline and Deadline Date</b>	2022 July 2022 July
<b>Input (budget/resources)</b>	Two full-time agricultural engineers and one full-time social worker, one temporary social worker's training costs.
<b>Responsible staff (title/department)</b>	Emine ANKARALI (sustainability and social compliance manager) Bünyamin SİVRİ (agricultural engineer) Serkan TANRIVERMİŞ (agricultural engineer)

<b>Marital or Pregnancy-Related Discrimination</b>	
<p><b>Benchmarks:</b></p> <p><i>ND.6.1: Employers shall abide by all protective provisions in national laws and regulations benefitting pregnant workers and new mothers, including provisions concerning maternity leave and other benefits; prohibitions regarding night work, temporary reassignments away from work stations and work environments that may pose a risk to the health of pregnant women and their</i></p>	<p><b>Risk of Noncompliance in Farm 14</b></p>

unborn children or new mothers and their new born children, temporary adjustment of working hours during and after pregnancy, and the provision of breast-feeding breaks and facilities.  
**ND.6.1.1:** Where such legal protective provisions are lacking, employers shall take reasonable measures to ensure the safety and health of pregnant women and their unborn children.

<b>Findings/Noncompliance Explanation:</b>	<p>There are no policies or specific practices for hiring and employing pregnant or nursing women. There is also no awareness among farmers about employing pregnant and nursing workers. The farmers do not request a pregnancy test or a health report for these workers. The growers are not concerned with these issues. However, the monitors encountered 2 nursing workers on farms 1 and 11 and 1 pregnant worker on farms 14. Nursing women do not work on the farm but at home, one is a cook. A pregnant woman works together with her husband. She says that she does not work hard but she works in the same hours and conditions as other workers. These women do not perform hazardous work. The monitors observed that there is no assessed risk or evidence that discrimination was applied not to hire them.</p> <p>Protective legal provisions are not known by farmers and there is no implementation for this.</p> <p>Source: Interview &amp; observations</p>
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**Company Action Plan:**

<b>Activity</b>	<p>A procedure on occupational health and safety will be prepared. This procedure will refer to pregnant women, patients and young workers. The prepared procedure will be given to workers and farmers as training. A new training module on occupational health and safety will be created. It will be added to the training topics to increase the awareness of the farmers on this issue.</p> <p>The worker Registration Form will be updated. With this form, workers in the special group (pregnant, young, disabled, sick) will be identified. Worker Registration Forms will be added to the farmer's handbook and distributed to all farmers.</p>
<b>Output indicators (targeted results)</b>	<p>1-Awareness will be created among farmers and workers. 100 farmers and 700 workers will be trained by August 2022 in Ünye.</p> <p>2-The procedure will be created.</p> <p>3-Workers in the special group will be identified before work.</p>
<b>Timeline and Deadline Date</b>	<p>1-August 2022</p> <p>2-June 2022</p> <p>3-August 2022</p>
<b>Input (budget/resources)</b>	One full-time social worker, one temporary social worker's training costs and the cost of the farmer handbooks.
<b>Responsible staff (title/department)</b>	Emine ANKARALI (sustainability and social compliance manager)

**Respect of Culture and Religion**

<p><b>Benchmarks:</b> <b>ND.11:</b> Employers shall guarantee that workers and their families living on-site can freely express elements of their cultural identity, such as clothing, music, language, food, and celebrations. Areas of social, cultural or religious significance are clearly identified, delineated, and preserved on the premises of the farm.</p>	<p><b>Risk of Noncompliance in farm 2</b></p>
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<b>Findings/Noncompliance Explanation:</b>	<p>The monitors verified that workers reported that they do not face any difficulty in the way they dress, listen to their music and other elements of their culture. However, the workers on 1 farm reported that they had difficulty in carrying out their religious duties as daily prayer due to the lack of toilets in the garden. Although this was not a result of a discriminatory implementation, farmers should support workers performing their prayers.</p>
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	Source: Interview & observations
<b>Company Action Plan:</b>	
<b>Activity</b>	As a pilot, 1 mobile toilet will be built. As is done every year, clean water and water drums will be provided to the gardens. Thus, workers will be supported to perform their prayers. At least 30 water drums will be provided.
<b>Output indicators (targeted results)</b>	1-One mobile toilet will be provided. 2-30 water drums and clean water will be provided for the workers to perform their prayer comfortably.
<b>Timeline and Deadline Date</b>	2022 August
<b>Input (budget/resources)</b>	Mobile toilet costs and water drums cost.
<b>Responsible staff (title/department)</b>	Emine ANKARALI (sustainability and social compliance manager)

## Harassment or Abuse

### Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	H/A.1.1	Risk of Noncompliance	All farms
	H/A.1.2	In Compliance	All farms
Discipline	H/A.2	In Compliance	All farms
	H/A.3	In Compliance	All farms
	H/A.4	In Compliance	All farms
	H/A.5	In Compliance	All farms
	H/A.6	In Compliance	All farms
	H/A.7	In Compliance	All farms
	H/A.13	Not Applicable	All farms
Violence	H/A.8.1	In Compliance	All farms
	H/A.8.2	In Compliance	All farms
	H/A.8.3	Not Applicable	All farms
Sexual Harassment	H/A.9.1	In Compliance	All farms
	H/A.9.2	In Compliance	All farms
	H/A.9.3	In Compliance	All farms
	H/A.9.4	In Compliance	All farms
Security Practices	H/A.10	In Compliance	All farms
	H/A.10.1	In Compliance	All farms
	H/A.10.2	In Compliance	All farms

### Harassment or Abuse Assessment Summary

**General Compliance**



<b>Benchmarks:</b> <i>H/A.1.1: Employers shall comply with all national laws, regulations and procedures concerning discipline, violence, harassment or abuse.</i>		<b>Risk of Noncompliance in all farms</b>
<b>Findings/Noncompliance Explanation:</b>	No cases of verbal or physical abuse were detected or reported. However, the awareness about the applicable regulations and penalties was low.  Source: Interview & observations	
<b>Company Action Plan:</b>		
<b>Activity</b>	Farmers and workers will be made aware of legal regulations and penalties for discrimination and harassment. Training modules will be updated. Training will be delivered to at least 700 workers in March and August; from June to August. Training will be delivered to at least 200 farmers and their relatives in Ordu.	
<b>Output indicators (targeted results)</b>	Awareness will be created among farmers and workers. Training will be given to at least 200 farmers and their relatives, and at least 700 workers in the Ünye district of Ordu province.	
<b>Timeline and Deadline Date</b>	2022 August	
<b>Input (budget/resources)</b>	One full-time social worker, one temporary social worker's training costs.	
<b>Responsible staff (title/department)</b>	Emine ANKARALI (sustainability and social compliance manager)	

## Child Labor

### Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	CL.1	Risk of Noncompliance	Farm 1,2,6,9, & 10
Minimum Age	CL.2	Noncompliance	Farm 1,2,6,9,10,12,14 & 15
Immediate Family Members	CL.3	In Compliance	All farms
Right to Education	CL.4.1 (PR)	In progress	All farms
Young Workers	CL.5	In Compliance	All farms
	CL.6.1	Noncompliance	All farms
	CL.6.2	Noncompliance	All farms
	CL.7	Noncompliance	All farms
Apprenticeships and Vocational Training	CL.8.1 (PR)	Not Applicable	All farms
	CL.8.2 (PR)	Not Applicable	All farms
Children on Premises	CL.9	In Compliance	All farms
Removal and Rehabilitation of Child Laborers	CL.10.1	In Compliance	All farms
	CL.10.2 (PR)	In progress	All farms

#### Notable Feature:

The company started a schooling program in the area with TEGV. They have a mobile education unit (truck) in the content of this program that aims to teach children science and other subjects.

## 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>	
<p><b>Risk of Noncompliance in farms 1,2,6,9, and 10</b></p>	
<p><b>Findings/Noncompliance Explanation:</b></p>	<p>Most farmers are aware that workers under the minimum legal age should not be employed. However, the monitors found out young workers under 18 and child laborers under 15 were employed.</p> <p>Source: Documentation, interview &amp; observations</p>
<p><b>Company Action Plan:</b></p>	
<p><b>Activity</b></p>	<p>To prevent child labor, regular training is given to farmers, workers and labor contractors.</p> <p>As soon as the child was seen during the audit, information was received by the auditor and action was taken immediately. The children were removed from the garden and directed to the safe area.</p> <p>Sabırlar will participate in activities to develop an internal control mechanism and establish a child labor system by participating in activities in the project for internal control and child protection for the project Harvesting the Future. A child labor monitoring and improvement system will be established to prevent child labour. Through this internal management system to be established, places at risk of child labor will be identified and the actions taken will be followed with the forms created through this system. Improvements to be made in the fight against child labour, their roles and responsibilities, monitoring methods will be explained with these forms, and a case management system will be established based on them.</p> <p>Whether child labor is employed or not will be determined in advance through internal audits, and a risk assessment will be made and action will be taken accordingly.</p> <p>A joint effort will be made with a non-governmental organization to find solutions to child labor together. A joint project will be carried out with the Educational Volunteers Foundation of Turkey to remove children from the garden. With TEGV's training truck, children will be kept away from the gardens and a safe area will be created for them to both receive education and have fun.</p>
<p><b>Output indicators (targeted results)</b></p>	<p>1-Awareness will be created among farmers and workers. 100 farmers and 700 workers will be trained by August 2022 in Ünye.</p> <p>2-A child labor internal monitoring system will be established. A case tracking form will be created. With this form, if child labor is detected, it will be possible to track how the process is managed, how the action is taken, and who is responsible in case follow-up forms.</p> <p>3-Farmer-based risk analysis will be made. In line with the risk analysis, at least 15 farms will be audited internally.</p> <p>4-A temporary summer school project will be held for children in August. It is aimed to reach at least 50 children in the temporary summer school project, which will be held in the Ünye district of Ordu province.</p>
<p><b>Timeline and Deadline Date</b></p>	<p>1-August 2022</p> <p>2-July 2022</p> <p>3-June 2022</p> <p>4-August 2022</p>
<p><b>Input (budget/resources)</b></p>	<p>Two full-time agricultural engineers and one full-time social worker, one temporary social worker's training costs and project cost.</p>

<b>Responsible staff (title/department)</b>	Emine ANKARALI (sustainability and social compliance manager) Bünyamin SİVRİ (agricultural engineer) Serkan TANRIVERMİŞ (agricultural engineer)
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### Minimum Age

<b>Benchmarks</b> <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>	<b>Noncompliance in farms 1,2,6, 9,10,12,14, and 15</b>
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<b>Findings/Noncompliance Explanation:</b>	The monitor verified the ages of interviewees during assessments through interviews with workers themselves and their family members and an ID check with one case of child labor. The monitors detected; 4 child laborers (3 Girls & 1 Boy) under the age of 15. A 14-year-old boy and a girl and a 12 years old girl among the seasonal migrant worker groups and a 13 years old girl among local worker groups were employed for hazelnut collection from the ground. Besides the workers under 15 years of age, the seasonal worker groups employed 4 male and 3 female workers of 17 years of age.  Source: Documentation, interview & observations
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### Company Action Plan:

<b>Activity</b>	Please see above, CAP for CL1
<b>Output indicators (targeted results)</b>	Please see above, CAP for CL1
<b>Timeline and Deadline Date</b>	Please see above, CAP for CL1
<b>Input (budget/resources)</b>	Two full-time agricultural engineers and one full-time social worker, one temporary social worker's training costs and project cost.
<b>Responsible staff (title/department)</b>	Emine ANKARALI (sustainability and social compliance manager) Bünyamin SİVRİ (agricultural engineer) Serkan TANRIVERMİŞ (agricultural engineer)

### Young Workers

<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> <i>CL.6.2: Employers shall maintain a list of all young workers, their entry dates, proof of age and description of their assignment.</i> <i>CL.7: No person under the age of 18 shall undertake hazardous work, i.e., work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of persons under the age of 18. Such work includes, but is not limited to, the application of agricultural chemicals, pesticides, and fertilizers, use of farm equipment tools and machinery, lifting or moving of heavy materials or goods, or carrying out hazardous tasks such as underground or underwater or at dangerous heights. Every activity performed by a young worker must be supervised by an adult.</i>	<b>Noncompliance in all farms</b>
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<b>Findings/Noncompliance Explanation:</b>	<p>Young workers come to the region with their parents or family members. They work either on the same farm or a nearby one. However, farmers do not keep records of the young workers. There were 20 young workers between 15 and 18 and 4 child laborers under 15 years. They work at harvesting hazelnuts from the ground or branches of the trees on slope farms during the same hours as the adult workers. None of the farmers implemented age verifications.</p> <p>Source: Interview &amp; observations</p>
<b>Company Action Plan:</b>	
<b>Activity</b>	<p>The worker and farmer training module will be updated. More detailed information will be given in the section on young labor. Who the young worker is, working hours, light work/heavy work and occupational health and safety issues will be explained in more detail. Young worker conditions will be determined.</p> <p>The Worker Registration Form will be updated. With this form, workers in the special group (pregnant, young, disabled, sick) will be identified.</p>
<b>Output indicators (targeted results)</b>	Updated training module and worker registration form.
<b>Timeline and Deadline Date</b>	2022 August
<b>Input (budget/resources)</b>	Two full-time agricultural engineers and one full-time social worker, one temporary social worker's training costs.
<b>Responsible staff (title/department)</b>	<p>Emine ANKARALI (sustainability and social compliance manager)</p> <p>Bünyamin SİVRİ (agricultural engineer)</p> <p>Serkan TANRIVERMİŞ (agricultural engineer)</p>

## Health, Safety and Environment

### Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HSE.1.	Risk of Noncompliance	All farms
Document Maintenance, Permits and Certificates	HSE.2 (PR)	In progress	All farms
	HSE.3.1	Not Applicable	All farms
	HSE.4 (PR)	In progress	All farms
Evacuation Requirements and Procedure	HSE.5.1 (PR)	Not initiated	All farms
	HSE.5.2	Risk of Noncompliance	All farms
Safety Equipment and First Aid	HSE.6.1 (PR)	In progress	Farm 1,2,5,6,8,9,10,13,14
	HSE.6.2 (PR)	Not initiated	All farms
	HSE.16.3 (PR)	In progress	All farms
Personal Protective Equipment	HSE.7 (PR)	In progress	All farms
	HSE.8	In Compliance	All farms
Chemical Management	HSE.9.1	In Compliance	All farms

	HSE.9.2	Risk of Noncompliance	1-6-7-9-10-14
	HSE.9.2.1	Risk of Noncompliance	All farms
	HSE.10	Not Applicable	All farms
	HSE.11.1	In Compliance	All farms
	HSE.11.2	In Compliance	All farms
Protection Reproductive Health	HSE.12.1	In Compliance	All farms
	HSE.12.2 (PR)	Not Applicable	All farms
Infrastructure	HSE.13 (PR)	Not Applicable	All farms
	HSE.17.1	In Compliance	All farms
	HSE.17.2 (PR)	Not initiated	All farms
	HSE.19 (PR)	In progress	Farm 1,2,5,6,7,9,10,11
	HSE.21 (PR)	In progress	All farms
	HSE.22 (PR)	In progress	All farms
Machinery Safety	HSE.14.1	Not applicable	All farms
	HSE.14.2	Not applicable	All farms
	HSE.14.3	Not applicable	All farms
	HSE.14.4	Not applicable	All farms
Ergonomics and Medical Facilities	HSE.15.2 (PR)	Not initiated	All farms
	HSE.16.2	Risk of Noncompliance	All farms

**Notable Feature:**

The Company has provided two portable toilets for placement on farms in need of workers. However, these could not be placed yet during the assessment due to the flood in previous weeks.

### Health, Safety and Environment Assessment Summary

General Compliance	
<p><b>Benchmarks:</b> HSE.1: Employers shall comply with all national laws, regulations and procedures concerning health, safety, and the environment.</p>	<b>Risk of Noncompliance in all farms</b>
<p><b>Findings/Noncompliance Explanation:</b></p> <p>The Company has communicated general information to the farmers and farmers have basic knowledge about health and safety issues. However, they do not verify if there is a pregnant, ill worker or any person with disabilities. They also do not know the regulations and there is no procedure-related to health and safety issues.</p> <p>Source: Interview &amp; observations</p>	
<b>Company Action Plan:</b>	
<p><b>Activity</b></p>	<p>A procedure on occupational health and safety will be prepared. This procedure will refer to pregnant women, patients and young workers. The prepared procedure will be presented to workers and farmers as a part of the training. A new training module on occupational health and safety will be created.</p> <p>The Worker Registration Form will be updated. With this form, workers in the special group (pregnant, young, disabled, sick) will be identified.</p>
<p><b>Output indicators (targeted results)</b></p>	<p>Awareness will be created among farmers and workers.</p> <p>The procedure will be created.</p> <p>The form will be updated.</p>

<b>Timeline and Deadline Date</b>	2022 August
<b>Input (budget/resources)</b>	One full-time social worker, one temporary social worker's training costs.
<b>Responsible staff (title/department)</b>	Emine ANKARALI (sustainability and social compliance manager)

<b>Evacuation Requirements and Procedure</b>	
<b>Benchmarks:</b> <i>HSE.5.2: Where appropriate, workers shall be trained in evacuation procedures at least once per year.</i>	<b>Risk of Noncompliance in all farms</b>
<b>Findings/Noncompliance Explanation:</b>	The monitors collected data that the area is reported not to have any earthquake risk. The risks in the area are heavy rains, floods, and landslides. When the rain starts, the workers stop working and wait at their accommodations. None of the farms have emergency and evacuation procedures against such risks. The Company and farmers could touch these risks during workers' training.  Source: Interview & observations
<b>Company Action Plan:</b>	
<b>Activity</b>	A procedure on occupational health and safety will be prepared. This procedure will refer to pregnant women, patients and young workers. In this procedure, actions that can be taken against risks such as rain will also be mentioned. The prepared procedure will be given to workers and farmers as training. A new training module on occupational health and safety will be created.
<b>Output indicators (targeted results)</b>	Awareness will be created among farmers and workers.  The procedure will be created.
<b>Timeline and Deadline Date</b>	2022 August
<b>Input (budget/resources)</b>	One full-time social worker, one temporary social worker's training costs.
<b>Responsible staff (title/department)</b>	Emine ANKARALI (sustainability and social compliance manager)

<b>Chemical Management</b>	
<b>Benchmarks:</b> <i>HSE.9.2: All chemicals and hazardous substances shall be properly labelled and stored in secure and ventilated areas and disposed of in a safe and legal manner, in accordance with applicable laws. Where relevant, Material Safety Data Sheets (MSDS) must be available as well.</i>	<b>Risk of Noncompliance in farms 1,6,7, 9,10, and 14</b>
<i>HSE.9.2.1: Labels shall be placed in the local language and the language spoken by workers, if different from the local language. Where workers are illiterate, the labels and instructions for their handling should be depicted by pictograms.</i>	<b>Risk of Noncompliance in all farms</b>

<b>Findings/Noncompliance Explanation:</b>	<p>Farmers do not have proper labels and storage. However, the monitors witnessed that the company provided some tools as signs for chemical storage but not all farmers have yet placed these properly. There is progress regarding this issue. Moreover, the monitor has not found any MSDS. Moreover, in many farms, there were no agro-chemicals substances observed as these are mainly used before the harvest period. The awareness for disposing of empty agro chemical containers was increasing. 9 out of 15 farmers were aware of safe disposal methods.</p> <p>There is no worker present that deals with chemicals and hazardous substances. The workers that the monitor interviewed said that they only carry out harvesting that consists of collecting the hazelnuts and sometimes carrying the sacks. It is mainly the farmer or a family member who deals with handling agrochemicals.</p> <p>Source: Documentation, interview &amp; observations</p>
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### Company Action Plan

<b>Activity</b>	<p>All farmers will have a sign made for the place where chemical pesticides are stored and warning signs will be placed. It will place garbage containers to dispose of empty agricultural chemicals at some common points. All farmers will be trained in this regard.</p> <p>List of Licensed and Prohibited Drugs and Drug Stock Inventory Form are already available in the farmer's handbooks, but these forms were not seen by the auditors since the farmer's handbooks were at home during the audit and the audit was carried out in the garden. The List of Licensed and Prohibited Medicines will be updated and placed in the file of all farmers and distributed. Secondly, in our farmer WhatsApp group, applications related to pesticides and fertilizers are mentioned. In addition, all farmers will be given training on the active ingredient in pesticides and fertilizers, re-entering the garden and waiting times for harvest, protective clothing and equipment to be used. Farmers will have signboards written on the spraying times to be hung in their gardens, and protective clothing and equipment will be distributed to all farmers, and how to use them will be communicated through training.</p> <p>A joint study will be carried out with the District Health Directorate for the farmers who apply pesticides in agriculture. Farmers will be given training on spraying and after this training, the farmers participating in the training will be given a spraying license. With this training, it is aimed to document at least 70 farmers. Thus, it will be ensured that the people who do chemical pesticides have information about the subject.</p>
<b>Output indicators (targeted results)</b>	<p>Awareness will be created among farmers and workers.</p> <p>Farmers will be provided with an agricultural spraying certificate.</p> <p>Signage will be made.</p> <p>Garbage containers will be taken.</p>
<b>Timeline and Deadline Date</b>	2022 August
<b>Input (budget/resources)</b>	Two full-time agricultural engineer training costs and cooperation cost, garbage container and signage costs.
<b>Responsible staff (title/department)</b>	Bünyamin SİVRİ (agricultural engineer) Serkan TANRIVERMİŞ (agricultural engineer)

### Ergonomics and Medical Facilities

**Benchmarks:**

*HSE.16.2: Medical facilities shall be established and maintained as required by applicable laws. In case of no local law, the employer shall ensure that the workers are able to utilize local service providers in case of medical emergencies and have the local*

**Risk of  
Noncompliance  
in all farms**

medical officer's contact address available to the workers. In the case of a medical emergency, e.g., injury or sudden illness, growers will not unreasonably delay allowing a worker to have access to medical treatment.

<b>Findings/Noncompliance Explanation:</b>	There is no responsible person identified for any health case. The farmer himself takes the ill person to the medical facilities by his vehicle. Besides, there is no emergency plan to access the medical facilities.  Source: Interview & observations
<b>Company Action Plan:</b>	
<b>Activity</b>	A document will be created for what to do in case of an emergency. It will contain the necessary directions in case of an emergency. Farmers and workers will be given training on this.
<b>Output indicators (targeted results)</b>	Emergency instructions will be developed for the farms. Awareness will be created among farmers and workers.
<b>Timeline and Deadline Date</b>	2022 August
<b>Input (budget/resources)</b>	Two full-time agricultural engineers and one full-time social worker, one temporary social worker's training costs.
<b>Responsible staff (title/department)</b>	Emine ANKARALI (sustainability and social compliance manager) Bünyamin SİVRİ (agricultural engineer) Serkan TANRIVERMİŞ (agricultural engineer)

## Hours of Work

### Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HOW.1.1	Noncompliance	All farms
	HOW.1.2	Noncompliance	All farms
	HOW.1.3	Noncompliance	Farms 1,2,5,7,10,11
	HOW.1.4	In Compliance	All farms
Rest Day	HOW.2	In Compliance	All farms
Meal and Rest Breaks	HOW.3	In Compliance	All farms
Protected Workers	HOW.4.1	Noncompliance	All farms
	HOW.4.2 (PR)	Not initiated	All farms
	HOW.4.3	Noncompliance	All farms
Overtime	HOW.5.1	Noncompliance	All farms
	HOW.5.2 (PR)	Not initiated	All farms
	HOW.6.1	Noncompliance	All farms
	HOW.6.2	Noncompliance	All farms
	HOW.6.3 (PR)	Not initiated	All farms
	HOW.7	Not Applicable	All farms
Public Holidays and Leave	HOW.8.1	Noncompliance	All farms
	HOW.8.2	Noncompliance	All farms



HOW.9	Not Applicable	All farms
HOW.10.1	Not Applicable	All farms
HOW.11 (PR)	Not Applicable	All farms
HOW.12.1 (PR)	Not Applicable	All farms
HOW.12.2 (PR)	Not initiated	All farms
HOW.13	In Compliance	All farms
HOW.14	Noncompliance	All farms
HOW.15 (PR)	Not initiated	All farms
HOW.16 (PR)	Not Applicable	All farms

### Hours of Work Assessment Summary

General Compliance	
<p><b>Benchmarks:</b></p> <p><b>HOW.1.1:</b> Employers shall comply with all national laws, regulations and procedures concerning hours of work, public holidays and leave.</p> <p><b>HOW.1.2:</b> In countries where local law does not set out hours of work specific to the agriculture sector, the participating company shall consult with local stakeholders representing the employers (farmers), workers and civil society to define the hours of work. As a general principle, the total hours of work: (1) shall not exceed the number of work hours freely (individually and/or collectively) agreed upon by workers, including that all overtime work is consensual; (2) shall not adversely affect workers' physical and mental health; (3) shall allow for adequate breaks and rest periods during a working day, as determined by the workers, including at least 24 consecutive hours of rest in every seven-day period; and (4) shall be fully compensated according to legal requirements or worker agreements, whichever is more favorable to workers.</p> <p><b>HOW.1.3:</b> 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.</p>	<p><b>Noncompliance in all farms</b></p> <p><b>Noncompliance in farms 1,2,5, 7,10, and 11</b></p>
<p><b>Findings/Noncompliance Explanation:</b></p> <p>Neither farmers nor the employees are aware of the national laws, regulations and procedures concerning hours of work, public holidays and leave in on assessed orchards.</p> <p>The working hours change between 7 am and 6 pm (for 6 migrant worker groups) and 8 am and 6 pm (for 2 migrant and 7 local worker groups). The break times change from 1.5 to 2 hours. There is one hour break for lunch in every orchard. When break times were subtracted the daily working hours were 9.5 for 3 migrant groups, 9 hrs for other 3 migrant groups, 8.5 hours for 1 local worker group and 8 hrs for 8 groups (2 migrant and 6 local groups). This makes weekly working hours ranging between; 66.5 and 56 hrs. The monitors observed that some of the workers and farmers were aware of regulations about working hours limited to 8 hours informed by the supervisors, but the monitors found out that the working hours were generally above 8 hours.</p> <p>The workers work between 20 to 30 days without rest days unless the weather is rainy. If the weather is rainy the workers are granted an unpaid rest day.</p> <p>Source: Interview &amp; observations</p>	
<b>Company Action Plan:</b>	
<p><b>Activity</b></p> <p>Since the workers come to work from the provinces they are in, they receive a wage per day they work. They work every day because they do not receive a wage on the day they are not working and they have about 30 days for the hazelnut harvest. For this reason, workers prefer to work every day when it is not raining.</p> <p>Practices and procedures regarding working hours, permits, and rest periods will be given to workers and farmers. The training module will be updated.</p> <p>The decision of the commission will be disseminated in our region. The commission decision will be announced to all workers and farmers before the hazelnut harvest begins. If the Commission's decision is not complied with, compliance will be encouraged.</p>	

<b>Output indicators</b> (targeted results)	See above for output indicators.
<b>Timeline and Deadline Date</b>	2022 August
<b>Input (budget/resources)</b>	Two full-time agricultural engineers and one full-time social worker, one temporary social worker's training costs.
<b>Responsible staff</b> (title/department)	Emine ANKARALI (sustainability and social compliance manager) Bünyamin SİVRİ (agricultural engineer) Serkan TANRIVERMİŞ (agricultural engineer)

<b>Protected Workers (pregnant or nursing women, young workers)</b>	
<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>	
<b>Noncompliance in all farms</b>	
<b>Findings/Noncompliance Explanation:</b>	<p>It is indicated in the national law that working hours for pregnant and nursing workers are 7.5 hours daily and 8 hours for young workers. However, the young and pregnant workers were working the same working hours up to 9.5 hours a day as any other workers. There is no regulation implemented for protected workers.</p> <p>Source: Interview &amp; observations</p>
<b>Company Action Plan:</b>	
<b>Activity</b>	See above CAP
<b>Output indicators</b> (targeted results)	See above output indicators
<b>Timeline and Deadline Date</b>	2022 August
<b>Input (budget/resources)</b>	One full-time social worker, one temporary social worker's training costs.
<b>Responsible staff</b> (title/department)	Emine ANKARALI (sustainability and social compliance manager)

<b>Overtime</b>	
<p><b>Benchmarks:</b></p> <p><i>How.5.1: 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.</i></p> <p><i>How.6.1: Employers shall not require workers to work more than the overtime hours allowed by the law of the country where the workers are employed.</i></p> <p><i>How.6.2: All overtime work shall be voluntary.</i></p>	
<b>Noncompliance in all farms</b>	

<b>Findings/Noncompliance Explanation:</b>	<p>The monitors reported that all the worker groups work more than 48 hours per week, between 56 and 66 hours. Overtime is not voluntary, but obligatory. The interviewed workers stated that the working hours are long. These workers are not paid for any overtime. The farmer and workers agree on total working hours as regular work against the usual daily wage. The workers have to accept these working hours to be able to work in the orchard. There is no awareness of working hours and overtime hours among farmers and workers.</p> <p>The Company and farmers should ensure that they work beyond the number of hours announced by the Commission. If they do not work beyond the number of hours announced by the Commission, then the regular working hours announced by the Ministry of Labor should be considered overtime and workers are paid accordingly.</p> <p>Source: Interview &amp; observations</p>
<b>Company Action Plan:</b>	
<b>Activity</b>	<p>Workers and farmers will be trained on overtime and working hours. Sabırlar aims to raise awareness about working hours.</p> <p>Working hours will be added to the contracts.</p>
<b>Output indicators (targeted results)</b>	<p>1-Awareness will be created among farmers and workers. 100 farmers and 700 workers will be trained by August 2022 in Ünye.</p> <p>2-It is aimed to make at least 15 contracts.</p>
<b>Timeline and Deadline Date</b>	<p>1-2022 August</p> <p>2-2022 August</p>
<b>Input (budget/resources)</b>	Two full-time agricultural engineers and one full-time social worker, one temporary social worker's research costs.
<b>Responsible staff (title/department)</b>	<p>Emine ANKARALI (sustainability and social compliance manager)</p> <p>Bünyamin SİVRİ (agricultural engineer)</p> <p>Serkan TANRIVERMİŞ (agricultural engineer)</p>

<b>Public Holidays and Leave</b>	
<p><b>Benchmarks:</b></p> <p><b>HOW.8.1:</b> Employers shall provide workers with all official public holidays as required under national laws, regulations and procedures.</p> <p><b>HOW.8.2:</b> Employer may engage with workers on a specific working scheme which allows workers to work on holidays if voluntarily agreed by the workers without any pressure to accept or retaliation if refused.</p> <p><b>HOW.14:</b> Employers shall provide workers with sick leave as required under national laws, local provisions, regulations and procedures.</p>	<b>Noncompliance in all farms</b>
<b>Findings/Noncompliance Explanation:</b>	<p>The monitors reported that there is no implementation of rights of public holidays, sick leave or rest days for workers in assessed farms. If a worker is ill, they can go home to rest or be taken to the hospital on unpaid leave.</p> <p>Since there is no permanent or long-term work applicable in the hazelnut harvest employment, annual leave is not applicable.</p> <p>The Company and farmers could create their procedures for such implementations and simultaneously lobby with authorities for fair implementations for seasonal agricultural workers.</p> <p>Source: Interview &amp; observations</p>

### Company Action Plan:

<b>Activity</b>	<p>Since there is no permanent and long-term work in the hazelnut harvest, annual leave is not in question, but lobbying activities will be carried out for public holidays, sick leave and rest days to make improvements in this area.</p> <p>Working hours will be added to seasonal agricultural work contracts and contracted work will be expanded.</p>
<b>Output indicators (targeted results)</b>	<p>The local government will be supported by lobbying activities. This will be discussed with the district governorship, governorship and municipalities.</p> <p>Contract work will become widespread. At least 15 contracts will be made.</p>
<b>Timeline and Deadline Date</b>	<p>1-2022 August</p> <p>2-2022 August</p>
<b>Input (budget/resources)</b>	Two full-time agricultural engineers and one full-time social worker cost.
<b>Responsible staff (title/department)</b>	<p>Emine ANKARALI (sustainability and social compliance manager)</p> <p>Bünyamin SİVRİ (agricultural engineer)</p> <p>Serkan TANRIVERMİŞ (agricultural engineer)</p>

## Compensation

### Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	C.1.1	In Compliance	All farms
	C.1.2	Noncompliance	Farm 1,2,6,7,9 & 10
	C.1.3	Risk of Noncompliance	All farms
	C.1.4 (PR)	Not initiated	All farms
Minimum Wage/Fair Compensation	C.2.1	Noncompliance	Farms 1,2,6,7,9,10 & 11
	C.2.2	Noncompliance	All farms
	C.2.3	In Compliance	All farms
	C.2.4 (PR)	Not initiated	All farms
	C.2.5 (PR)	Not initiated	All farms
	C.2.6 (PR)	Not initiated	All farms
	C.3	Not Applicable	All farms
Farmer/Producer Income	C.4 (PR)	In progress	All farms
Wage Payment and Calculation	C.6	In Compliance	All farms
	C.7.1	In Compliance	All farms
	C.7.5	Risk of Noncompliance	All farms
	C.7.3 (PR)	Not initiated	All farms
	C.7.4 (PR)	Not initiated	All farms
	C.7.2	Noncompliance	All farms
	C.8.1	Noncompliance	All farms
	C.8.2	Noncompliance	All farms
	C.8.3	Noncompliance	All farms
	C.8.4 (PR)	Not initiated	All farms

	C.9 (PR)	Not initiated	All farms
	C.10.1	Not Applicable	All farms
	C.10.1.1	Not Applicable	All farms
	C.10.2	Not Applicable	All farms
	C.10.3	Not Applicable	All farms
Workers Awareness	C.11.1.1	Risk of Noncompliance	All farms
	C.11.1.2	Not Applicable	All farms
	C.11.1.3	In Compliance	All farms
	C.11.1.4	Not Applicable	All farms
	C.11.1.5	Risk of Noncompliance	All farms
	C.13 (PR)	Not initiated	All farms
Fringe Benefits	C.12.1	In Compliance	All farms
	C.12.2 (PR)	Not initiated	All farms
	C.12.3	In Compliance	All farms
	C.12.4	In Compliance	All farms
	C.12.5	Not Applicable	All farms

### Compensation Assessment Summary

General Compliance	
<p><b>Benchmarks:</b></p> <p><b>C.1.2:</b> 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 1,2,6, 7,9, and 10</b>
<p><b>C.1.3:</b> In countries where local law does not specify compensation specific to the agriculture sector, the participating company shall consult with local stakeholders representing the employers (farmers), workers, local government and commissions, and civil society to define the appropriate wage level. As a general principle, employers shall follow the minimum wage standards set for other sectors in the same region.</p>	<b>Risk of Noncompliance in all farms</b>
<p><b>Findings/Noncompliance Explanation:</b></p> <p>There are no financial disciplinary measures but there are deductions in the wages of the seasonal migrant workers. These workers are recruited through a labor contractor who deducts about 10% of the worker's wages as his intermediary commission. This deduction is a prerequisite for finding a job and working on that farm since the labor contractor reaches an agreement with the farmer a couple of months before the harvest. The deduction is known by both farmers and workers.</p> <p>Source: Interview &amp; observations</p>	
<p><b>Company Action Plan:</b></p>	
<p><b>Activity</b></p>	<p>The most important step to prevent this interruption is agricultural business intermediaries. In this direction, Sabırlar joined the Harvesting The Future project carried out by the FLA. Sabırlar team finds and map undocumented agricultural labor intermediaries at harvest times. The team holds talks with İŞKUR during the term, provide training to agricultural business intermediaries and support them in obtaining the agricultural employment intermediation certificate. So far, they have had 20 agricultural business intermediaries get agricultural business intermediary certificates. This year, they will provide training to 4 agricultural business intermediaries in March and support them in obtaining this certificate. It is aimed to prevent these cuts with the training Sabırlar will give to agricultural business intermediaries.</p>
<p><b>Output indicators (targeted results)</b></p>	<p>Awareness will be raised among labor contractors.</p> <p>Agricultural business intermediaries will be mapped and documented.</p>

<b>Timeline and Deadline Date</b>	2022 August
<b>Input (budget/resources)</b>	One full-time social worker training costs and certificate cost.
<b>Responsible staff (title/department)</b>	Emine ANKARALI (sustainability and social compliance manager)

<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 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 farms 1,2,6, 7,9,10 and 11</b>
<i>C.2.2: Employers shall provide all legally required benefits to all workers.</i>	<b>Noncompliance in all farms</b>
<b>Findings/Noncompliance Explanation:</b>	The local commission announced the daily legal minimum wage as 120 TL for agricultural workers. The labor contractors deduct 10% of the seasonal migrant worker's wages. After this deduction, the daily wage of these workers decreases to 108 TL which is under the legal minimum wage.  Source: Interview & observations
<b>Company Action Plan:</b>	
<b>Activity</b>	Please see above CAP
<b>Output indicators (targeted results)</b>	Please see above Output Indicators
<b>Timeline and Deadline Date</b>	2022 August
<b>Input (budget/resources)</b>	One full-time social worker training costs and certificate cost.
<b>Responsible staff (title/department)</b>	Emine ANKARALI (sustainability and social compliance manager)

<b>Wage Payment and Calculation</b>	
<b>Benchmarks:</b>	
<i>C.7.5: No one can receive wages on behalf of a worker, unless the worker concerned has, in full freedom, authorized in writing for another person to do so.</i>	<b>Risk of Noncompliance in all farms</b>
<i>C.7.2: FLA-affiliates shall ensure that farmers/producers receive payments and certification premiums through a traceable and reliable payment system.</i>	<b>Noncompliance in all farms</b>
<i>C.8.1: Employers shall compensate workers for all hours worked.</i>	
<i>C.8.2: Employers shall comply with all applicable laws, regulations and procedures governing the payment of premium rates for work on holidays, rest days, and overtime. There might however be specific working schemes voluntarily agreed by the workers to work on holidays and rest days for short-term seasonal work, which would make this provision not applicable.</i>	
<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>	

<b>Findings/Noncompliance Explanation:</b>	<p>All wages are paid upon completion of seasonal tasks. The farmers employ a working group for their harvest and when their work on their farms is finished they pay the workers' wages on completion to the labor contractor, the supervisors or directly to the workers depending on recruitment practices. When this was asked of workers, they said that it is safe to have their earnings with the supervisor until going back to their hometown. The total harvest period is about 20 to 30 days. The farmers pay all wages in cash.</p> <p>The assessors observed that 5 farmers had written agreements (farms 1,2,5,9 &amp; 11). All others had a verbal agreement.</p> <p>There is no union or other kind of membership. Therefore, there is no deduction applicable.</p> <p>The workers have not been informed about the overtime and overtime rates before agreeing to the overtime work and they are not paid for overtime as mentioned here above. The Company and farmers could work on mentioning overtime with workers' written or verbal agreements.</p> <p>The farmer agrees to one wage for total daily work hours with labor contractors or workers.</p> <p>Source: Interview &amp; observations</p>
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**Company Action Plan:**

<b>Activity</b>	<p>Working hours will be added to seasonal agricultural work contracts and contracted work will be expanded.</p> <p>The contracts will be added to the farmer's handbook and distributed to the farmers.</p>
<b>Output indicators (targeted results)</b>	<p>Awareness will be raised among labor contractors.</p> <p>Contract work will become widespread.</p>
<b>Timeline and Deadline Date</b>	2022 August
<b>Input (budget/resources)</b>	One full-time social worker training costs and the cost of the farmer handbook.
<b>Responsible staff (title/department)</b>	Emine ANKARALI (sustainability and social compliance manager)

<b>Workers Awareness</b>	
<p><b>Benchmarks:</b></p> <p><i>Employers shall make every reasonable effort to ensure workers understand their compensation, including:</i></p> <p><b>C.11.1.1:</b> the calculation of wages,</p> <p><b>C.11.1.5:</b> Employers shall communicate in writing or orally where necessary to all workers all relevant compensation information in the local language or language spoken by the workers, if different from the local language.</p>	<b>Risk of Noncompliance in all farms</b>
<b>Findings/Noncompliance Explanation:</b>	<p>Most of the workers are not aware of the legally entitled minimum wage for hazelnut harvest. They all know that the local commission determines the wages but not all workers are informed or sure about the exact wage they will receive before commencing work. However, the local workers also do not know the wage for themselves since the farmers pay them higher than both the announcement of the commission and migrant workers. Both groups are not communicated regarding the payment scheme and the details of the compensation calculation at the start of the harvest.</p>

	Source: Interview & observations
<b>Company Action Plan:</b>	
<b>Activity</b>	The wage determined by the commission will be announced to all workers, both local and seasonal. It is aimed to raise awareness of at least 300 workers throughout the season.
<b>Output indicators (targeted results)</b>	Awareness will be raised among farmers and workers.
<b>Timeline and Deadline Date</b>	2022 August
<b>Input (budget/resources)</b>	One full-time social worker training costs.
<b>Responsible staff (title/department)</b>	Emine ANKARALI (sustainability and social compliance manager)



**Total number of Farms: 15**

	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 non-compliances or risk of non-compliances</b>	100%	100%	100%	0%	100%	0%	100%	100%	100%	
Farm No. 1	24	4	1	0	5	0	5	10	10	59
Farm No. 2	23	5	1	0	5	0	4	10	10	58
Farm No. 3	22	4	1	0	3	0	4	2	8	44
Farm No. 4	22	4	1	0	3	0	4	2	8	44
Farm No. 5	19	4	1	0	3	0	4	10	8	49
Farm No. 6	25	4	1	0	5	0	5	2	10	52
Farm No. 7	24	4	1	0	3	0	5	10	10	57
Farm No. 8	22	4	1	0	3	0	4	2	8	44
Farm No. 9	24	4	1	0	5	0	5	2	10	51
Farm No. 10	25	4	1	0	5	0	5	10	10	60
Farm No. 11	25	4	1	0	3	0	4	10	9	56
Farm No. 12	22	4	1	0	4	0	4	2	8	45
Farm No. 13	22	4	1	0	3	0	4	2	8	44
Farm No. 14	22	6	1	0	4	0	5	2	8	48
Farm No. 15	22	4	1	0	4	0	4	2	8	45
<b>TOTAL</b>	<b>343</b>	<b>63</b>	<b>15</b>	<b>0</b>	<b>58</b>	<b>0</b>	<b>66</b>	<b>78</b>	<b>133</b>	<b>756</b>