



Independent External Monitoring Agriculture Report, 2022

Fair Labor Association conducts an Independent External Monitoring (IEM) assessment when a company has begun implementation of its internal monitoring and remediation program. An IEM allows the assessment of labor conditions at the farm level and first-level processing if it overlaps with the farms based on the [FLA Agriculture Workplace Code of Conduct and Monitoring Benchmarks for the Agriculture Sector](#). FLA gathers further data through community stakeholder interviews with civil society organizations, government officials, community leaders, and supply chain actors. FLA examines internal monitoring systems at the country level against [FLA's Principles of Fair Labor and Responsible Sourcing for Agricultural Supply Chains](#).

Company	Sabirlar
Country	Türkiye
Crop	Hazelnut
Production process	Harvest
Assessment location	Türkiye, Ordu, Onye
Monitor	Asya Control Certifications & Consultancy
Assessment dates	20-23 August 2022
Number of assessed farms	15
Total area covered	43.95 Acre
Number of farmers interviewed	15
Total number of workers	158
Number of workers interviewed	76

Employment Relationship

Compliance Status

Section	Benchmark	Compliance status	Farms
Human Resource Management System	ER.1.1	Risk of Noncompliance	Farms 3,6,7,9,10,11,12,13,14,15
	ER.2.1 (PR)	In progress	Farms 4,5
	ER.2.1.1 (PR)	In progress	Farms 4,5
Recruitment and Hiring	ER.3.1	Risk of Noncompliance	Farms 2,3,13,14,15
	ER.3.1.1	Noncompliance	Farms 2,3,13,14,15
	ER.3.1.2	Noncompliance	Farms 2,3,13,14,15
	ER.4	Risk of Noncompliance	Farms 1,2,3,4,5,6,7,8,11,12
	ER.5.1	Risk of Noncompliance	Farms 1,2,3,4,5,6,7,8,11,12
	ER.5.2	Risk of Noncompliance	Farms 1,2,3,4,5,6,7,8,11,12
	ER.5.3	In Compliance	
	ER.6 (PR)	In progress	All farms
	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	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	
	ER.9.3.2	In Compliance	
	ER.9.3.3	In Compliance	
	ER.10	Not Applicable	
	ER.11	Noncompliance	All farms
	ER.12.1	Risk of Noncompliance	Farm 3,9,15
	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	
	ER.15.2	In Compliance	
	ER.15.2.1	Noncompliance	All farms
	ER.16.1	In Compliance	
	ER.16.2	In Compliance	
	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	
	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	Noncompliance	All farms except 4,5,6,11,15
HSE Management System	ER.24.1.	Risk of Noncompliance	All farms
	ER.24.2 (PR)	In compliance	
	ER.24.3	In Compliance	
	ER.24.4.1 (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	
	ER.25.4	In Compliance	

Employment Relationship Assessment Summary

Notable Good Practices (if any)
The affiliated Company started general health screening activities in collaboration with local health authorities for all workers. Workers said that they are pleased with this implementation.
The affiliated Company distributes mini packs to workers with masks, gloves, hats, and hygiene tools.

Human Resource Management System	
Benchmarks	Compliance Status
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 communicate them to workers.	Risk of Noncompliance in Farms 3,6,7,9,10,11,12,13,14,15
Findings/Noncompliance Explanation	<p>The assessors have found out that there are written agreements in 4 farms between the seasonal agricultural worker groups and the farmers. The terms and conditions of employment, job description, and compensation were mentioned in these written contracts. However, the rest of the farms have just verbal agreements.</p> <p>Workers on every farm knew the working hours and were aware of the daily wages, except for farms 3,11,14. Nevertheless, workers stated they were concerned about signing an agreement, specifically about losing their social welfare benefits due to undertaking registered work.</p>
Company Action Plan	
Activity	<p>The number of written agreements between farmers, workers, and intermediaries will be increased. At least 20 contracts will be signed in August.</p> <p>Kurdish and Turkish handbooks will be prepared for workers and farmers. These handbooks will be distributed to all workers in August. The importance of contract work will also be mentioned in this handbook.</p> <p>Training will be given to labor contractors, workers, and farmers on the importance of contract work. In this direction, trainings will be given to 25 labor contractors, 1000 workers, and 120 farmers until September 2023.</p>
Output indicators (targeted results)	<p>The number of written contracts will increase.</p> <p>Awareness will be created among farmers and workers.</p>

Timeline and Deadline Date	2023 August
Input (budget/resources)	One full-time social worker, one temporary social workers training costs, and the cost of the farmer handbooks.
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager)

Recruitment and Hiring

Benchmarks	Compliance Status
ER.3.1.1: Employers shall take reasonable measures to ensure such documentation is complete and accurate. 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.	Noncompliance in farms 2,3,13,14,15
ER.3.1: Employers shall verify proof of age documentation for all young workers on the farm at the time of their employment and work towards collecting and maintaining all documentation necessary to confirm and verify the date of birth of all workers, including long-term and casual workers. 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. 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. 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.	Risk of Noncompliance in farm In farms 2,3,13 to 15 In farms 1,2,3,4,5,6,7,8,11,12

Findings/Noncompliance Explanation	<p>There is a practice for age verification. At farms 1,4,5,6,8,9,11,12, farmers check workers' age by checking ID. However, there was no ID check at farms 2,3,13,14,15. 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 this ID control and occurs during this process.</p> <p>The labor contractor implements a wage deduction in the name of a recruitment fee. This year minimum wage was declared as 216TL. However, farmers reported that they would pay workers 250 TL, and 10% will be deducted from this amount at farms 1,2,4,5,6,7,8,11 by labor contractors. In farm 12, workers receive a daily wage of 270 TL. Based on this calculation, workers at farms 1,2,3,4,5,6,7,8,11,12 receive above the legal minimum wage of 216TL after 10% intermediary deductions.</p> <p>There are young workers in 6,7,10,11,12,13 gardens, and they work the same hours as adults and do the same job.</p> <p>Fundamental labor rights such as social security and holiday leave/payment are not 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 job is done.</p> <p>There is no permanent work on the farm. Hence the farmer does not need or employ any permanent workers, according to the farmers and workers.</p>
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Company Action Plan

Activity	<p>All farmers will receive age verification training until the end of the 2023 season. Until September 2023, 120 farmers will be trained on this subject.</p> <p>Although the labor contractors made a 10% deduction, the workers did not stay below the determined minimum wage. On the other hand, it will provide trainings to labor contractors to prevent labor contractors from making a 10% deduction. In January 2023, 20 labor contractors will be given training on this subject.</p>
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	<p>A handbook will be prepared for workers and farmers. In this handbook, detailed information will be given in the section on the young labor force. Who is the young worker, working hours, light/heavy work, and occupational health and safety issues will be explained in more detail. By September 2023, these handbooks will be distributed to all workers and farmers.</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 on each farmer varies. Lobbying activities will be carried out by meeting with other stakeholders.</p>
Output indicators (targeted results)	<p>Awareness will be created among farmers and workers.</p> <p>Awareness will be raised among labor contractors.</p>
Timeline and Deadline Date	2023 August
Input (budget/resources)	Two full-time agricultural engineers and one full-time social worker, one temporary social workers training costs
Responsible staff (title/department)	<p>Emine ANKARALI (sustainability and social compliance manager)</p> <p>Bünyamin SİVRİ (agricultural engineer)</p> <p>Serkan TANRIVERMİŞ (agricultural engineer)</p>

Terms and Conditions	
Benchmarks	Compliance Status
<p>ER.9.2: Employment terms shall be those to which the worker has voluntarily agreed, provided those terms do not fall below: ER.9.2.3: the FLA Workplace Code. ER.11: 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>Noncompliance in all farms</p>
<p>ER.9.1: Workers should be made aware of the employment terms under which they are engaged. ER.9.2: Employment terms shall be those to which the worker has voluntarily agreed, provided those terms do not fall below: ER.9.2.1: provisions of national laws 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. ER.12.1.1: Employers shall inform workers that any form of harassment or abuse in the workplace shall be subject to disciplinary measures. ER.13.1: 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>Risk of noncompliance in All farms</p> <p>Farms 3,9,15</p> <p>Farms 1,3,4,6,8,9,10, 11,12,13,14 & 15</p> <p>All Farms</p>
Findings/Noncompliance Explanation	<p>Workers in farms 9,10,13,14,15 work in line with legal working hours. However, working hours are one hour longer than the national law for remaining farms without overtime payment. All seasonal worker groups work between 07.00-18:00. Three of these groups have 2-hour breaks.</p> <p>Almost all farmers generally have essential awareness of legally mandated requirements for disadvantaged groups. However, monitors detected young workers working on seven farms performing the same work and hours as adult workers.</p> <p>Farmers at farms 1,2,3,4,5 had an awareness of workplace rules and labor standards. However, this did not cover all of the information needed. They mostly knew about working hours, health and safety, child labor, and nondiscrimination. However, they did not transfer this information to the workers. The Participating Company does these communication and awareness-raising activities for all farmers. In farm 3, the working group was not trained.</p>

	<p>Farmers, or any supervisor of workers, have only partial knowledge of the local labor laws and the FLA Code. Both farmers and supervisors know that there cannot be workers under 18 (farmers 8-9 know 16 minimum working age). Some knew about the legal rules of working hours. Some of the supervisors say that they work 8 hours a day. The monitor encountered that the statements of the workers were different. The monitors crosschecked and found out that when they know the regulation and do not comply, they mention it differently. This is the case for workers under 18 of age. Almost all the workers below 18 said that they were born in 2005. The monitor crosschecked with other information such as sisters, brothers, other family members, schooling, and exams. As a result of this monitor found out that they tried to hide their age. In addition, farmers do not have detailed knowledge about other issues related to FLA benchmarks.</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 the disposal of pesticides, the environment, emergency numbers and social policies, legal working age, discrimination/harassment, freedom, forced labor, compensation, and social rights of the workers. Unfortunately, these are not explained in detail, but the poster says these should be applied in the workplace.</p> <p>None of the employers have informed workers about any form of harassment/abuse in the workplace and that this kind of activity is subject to disciplinary measures.</p> <p>Farmers do not inform workers about occupational safety and health conditions before starting work.</p> <p>Additionally, the Company stated they conducted worker trainings in Şanlıurfa, one of the main cities of origin of workers, before the 2022 Harvest. They accessed 1549 workers in 60 sessions during the origin trainings in collaboration with two other hazelnut companies.</p>
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Company Action Plan

<p>Activity</p>	<p>Workers and farmers will be notified of the procedures and principles regarding working hours, permits, and rest periods. The training module will be updated. The contracts will be included 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 employees. In March and August 2022, 1790 employees were trained. In addition, the training modules have been updated so employees can better understand the training.</p> <p>In January and August of 2023, more than 1500 workers will be trained on all these issues.</p> <p>Kurdish and Turkish handbooks will be prepared for workers and farmers. These handbooks will be distributed to all workers in August. This handbook will discuss the importance of contract work, legal working hours, and FLA codes.</p>
<p>Output indicators (targeted results)</p>	<p>Awareness will be created among farmers and workers.</p>
<p>Timeline and Deadline Date</p>	<p>2023 August</p>
<p>Input (budget/resources)</p>	<p>One full-time social worker, one temporary social workers training costs, and the cost of the farmer handbooks.</p>
<p>Responsible staff (title/department)</p>	<p>Emine ANKARALI (sustainability and social compliance manager)</p>

Administration	
Benchmarks	Compliance Status
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).	Noncompliance in all farms

Findings/Noncompliance Explanation	There is no practice of properly documenting advances. Instead, all are performed verbally, or each side takes notes to use as reminders for themselves.
Company Action Plan	
Activity	When farmers pay advances to workers, a signed form is prepared to verify this. This form will be added to the updated training module and given to workers and farmers as training. In addition, this form will be added to all farmer handbooks and distributed to all farmers. In this direction, trainings will be given to 25 agricultural worker intermediaries, 500 workers, and 120 farmers until September 2023.
Output indicators (targeted results)	Awareness will be created among farmers and workers.
Timeline and Deadline Date	2023 August
Input (budget/resources)	One full-time social worker, one temporary social workers training costs
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager)

Work Rules and Discipline	
Benchmarks	Compliance Status
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 the case of smallholder settings, the existing appeal mechanism at the community level is acceptable.	Noncompliance in all farms
Findings/Noncompliance Explanation	There are no disciplinary rules or practices that embody a system of progressive discipline at farms. Farmers of farms 3,9,15 stated that in case of dissatisfaction with the worker's performance, they would just cease to work with them without undergoing any process or undertaking any procedure. This is a decision that becomes effective the very next day.
Company Action Plan	
Activity	The procedure regarding the Disciplinary Rules has been established before, but since the subject is new, it has not become widespread among all workers and farmers. The disciplinary procedure will be included in the farmer's handbook and distributed to all farmers (at least 120 farmers). One hundred twenty farmers in Unye district between June and August; Discipline training will be given to at least 500 workers in Şanlıurfa (in January) and in Ünye (in August).
Output indicators (targeted results)	The procedure will be attached to the farmer files. Awareness will be created among farmers and workers.
Timeline and Deadline Date	2023 August
Input (budget/resources)	One full-time social worker, one temporary social workers training costs, and the cost of the farmer files.
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager)

Access to Training for Family Members	
Benchmarks	Compliance Status
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.	Noncompliance except the farms 4,5,6,11,15
Findings/Noncompliance Explanation	Usually, only the farmers and workers themselves participate in training. Farmers 4,5,6,11,15 stated that their family members also participated in training and awareness-raising activities.
Company Action Plan	
Activity	The participation rate of the families of the farmers in the agricultural and social trainings will be increased. At least one family member of each farmer will be included in the training and informed about farming practices. As much as possible, women will be invited to the training.
Output indicators (targeted results)	Awareness will be created among farmers and workers.
Timeline and Deadline Date	2023 August
Input (budget/resources)	Two full-time agricultural engineers and one full-time social worker, one temporary social workers training costs
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager) Bünyamin SİVRİ (agricultural engineer) Serkan TANRIVERMİŞ (agricultural engineer)

HSE Management System	
Benchmarks	Compliance Status
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.	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	The Company stated that they organized training in Şanlıurfa before the 2022 Harvest, and HSE was one of the leading training topics. HSE rules are also communicated to workers by the affiliated company staff during Harvest time. On farms 1 and 2, the monitors found out that the employees of the affiliated Company carried out the communication. However, the workers mainly remember health and hygiene-related issues, and there is lower awareness regarding safety rules. Furthermore, assessors met workers who could not understand the training in Turkish at farms 8,11,12, which signals that conveying the messages may be problematic due to language and literacy challenges. As a side note, it was observed that women were especially very interested in the cancer screening activity of the affiliated Company.
Company Action Plan	
Activity	Safety rules issues will be covered in the training. In addition, worker and farmer training modules will be updated, and occupational health and safety practices will be included. Occupational health and safety training will be given to at least eight villages and 120 farmers and their families throughout the year in the Unye district and to at least 700 workers in January and August. We will ensure that at least one person (preferably a labor contractors) who speaks Kurdish or Arabic will be with us while conducting the trainings. In addition, before

	<p>the trainings, we will ask the employees if they want translations and provide trainings according to their language preferences.</p> <p>Kurdish and Turkish handbooks will be prepared for workers and farmers. These handbooks will be distributed to all workers in August. This handbook will cover the importance of contract work, legal working hours, FLA codes, and occupational health and safety issues.</p>
Output indicators (targeted results)	Awareness will be created among farmers and workers.
Timeline and Deadline Date	2023 August
Input (budget/resources)	Two full-time agricultural engineer and one full-time social worker, one temporary social workers training costs, and the cost of the farmer handbooks.
Responsible staff (title/department)	<p>Emine ANKARALI (sustainability and social compliance manager)</p> <p>Bünyamin SİVRİ (agricultural engineer)</p> <p>Serkan TANRIVERMİŞ (agricultural engineer)</p>

Nondiscrimination

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	ND. 1	Noncompliance	All farms
Recruitment and Employment Practices	ND.2.1	In Compliance	
	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	
	ND.5.2	In Compliance	
	ND.5.3	In Compliance	
	ND.6.1	In Compliance	
	ND.6.1.1	In Compliance	
Health-Related Discrimination	ND. 7	Not Applicable	
	ND.8	Not Applicable	
	ND. 9	Not Applicable	
Respect of Culture and Religion	ND.11	In Compliance	

Nondiscrimination Assessment Summary

General Compliance	
Benchmarks	Compliance Status
ND.1: Employers shall comply with all national laws, regulations, and procedures concerning nondiscrimination.	Noncompliance in all farms
Findings/Noncompliance Explanation	Employers have an awareness and sensitivity to nondiscrimination. It has been observed that the farmers at farms 1,2,3,4,5 have good communication with their workers. However, none of them knows any local laws, regulations, or judicial processes related to nondiscrimination.

	Farmers expressed that they prefer to work with local workers as they are more satisfied with their performance and that they can not communicate easily with migrant workers.
Company Action Plan	
Activity	All trainings will explain legal provisions and laws regarding discrimination in more detail. Legal provisions regarding discrimination will be mentioned in the prepared handbooks. These handbooks will be distributed to at least 120 farmers and 500 workers this year.
Output indicators (targeted results)	Awareness will be raised among farmers and workers
Timeline and Deadline Date	2023 August
Input (budget/resources)	One full-time social worker, one temporary social workers training costs, and the cost of the farmer handbooks.
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager)

Recruitment and Employment Practices	
Benchmarks:	Compliance Status
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.	Noncompliance in all farms
Findings/Noncompliance Explanation	None of the farmers or labor contractors have a nondiscrimination policy. However, they are familiar with the concept of nondiscrimination. There is no communication or briefing to workers about any nondiscrimination policies or regulations. Moreover, according to the statements of the farmers and their workers, there were no discrimination practices in recruitment.
Company Action Plan	
Activity	All trainings will explain legal provisions and laws regarding discrimination in more detail. Legal provisions regarding discrimination will be mentioned in the prepared handbooks. These handbooks will be distributed to at least 120 farmers and 500 workers this year.
Output indicators (targeted results)	Awareness will be raised among farmers and workers
Timeline and Deadline Date	2023 August
Input (budget/resources)	One full-time social worker, one temporary social workers training costs, and the cost of the farmer handbooks.
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager)

Compensation Discrimination	
Benchmarks	Compliance Status
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.	Noncompliance in all farms

Findings/Noncompliance Explanation	<p>The monitors detected discrimination practices in terms of compensation. The seasonal migrant workers are paid between 216-250 TL, whereas local groups are paid 250-300 TL. Migrant workers' transportation costs from their home town are not always covered, whereas the local workers transportation fees are covered.</p> <p>Six migrant and four local worker groups brought their meals to the farm. However, there is a cook in each seasonal migrant worker groups except for one seasonal worker group who was cooking their food after harvest work.</p>
Company Action Plan	
Activity	<p>All trainings will explain legal provisions and laws regarding discrimination in more detail.</p> <p>To prevent the wage gap between the workers, the commission's decision will be announced to the farmers, and trainings will be given to raise awareness about the issue.</p>
Output indicators (targeted results)	Awareness will be raised among farmers and workers.
Timeline and Deadline Date	2023 August
Input (budget/resources)	One full-time social worker, one temporary social workers training costs
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager)

Discrimination in Training and Communication	
Benchmarks	Compliance Status
<p>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.</p>	<p>Risk of Noncompliance in all farms</p>
Findings/Noncompliance Explanation	<p>There is no intentional exclusion from the training or communication for any workers. On the other hand, due to the language of the trainings and communications, which are in Turkish, workers having difficulties understanding or reading Turkish or illiterate workers could face challenges in getting the message. In addition, there are Kurdish and Arabic workers to whom the trainings is translated by their family members or relatives.</p> <p>Assessors met workers who could not understand the training in Turkish at farms 8,11,12.</p>
Company Action Plan	
Activity	<p>We will ensure that at least one person (preferably labor contractors) who speaks Kurdish or Arabic is with us while conducting our trainings. Before the trainings, we will ask the workers if they want translations and provide training according to their language preferences.</p> <p>Kurdish and Turkish handbooks will be prepared for workers and farmers. These handbooks will be distributed to all workers in August. This handbook will cover the importance of contract work, legal working hours, FLA codes, and occupational health and safety issues.</p>
Output indicators (targeted results)	<p>Awareness will be created among farmers and workers.</p> <p>Workers will be offered a choice of languages.</p>
Timeline and Deadline Date	2023 August
Input (budget/resources)	Two full-time agricultural engineer and one full-time social worker, one temporary social workers training costs, and the cost of the farmer handbooks.

Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager) Bünyamin SİVRİ (agricultural engineer) Serkan TANRIVERMİŞ (agricultural engineer)
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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	
Discipline	H/A.2	In Compliance	
	H/A.3	In Compliance	
	H/A.4	In Compliance	
	H/A.5	In Compliance	
	H/A.6	In Compliance	
	H/A.7	In Compliance	
	H/A.13	Not Applicable	
Violence	H/A.8.1	In Compliance	
	H/A.8.2	In Compliance	
	H/A.8.3	Not Applicable	

Sexual Harassment	H/A.9.1	In Compliance	
	H/A.9.2	In Compliance	
	H/A.9.3	In Compliance	
	H/A.9.4	In Compliance	
	H/A.9.5 (PR)	Not Initiated	All Farms
Security Practices	H/A.10	In Compliance	
	H/A.10.1	In Compliance	
	H/A.10.2	In Compliance	

Harassment or Abuse Assessment Summary

General Compliance	
Benchmarks	Compliance Status
H/A.1.1: Employers shall comply with all national laws, regulations, and procedures concerning discipline, violence, harassment, or abuse.	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	No cases of verbal or physical abuse were detected or reported. However, the awareness of the applicable regulations and penalties was low.
Company Action Plan	
Activity	Farmers and workers will be informed of legal regulations and penalties for discrimination and harassment. In addition, training modules will be updated. To at least 700 workers in January and August, From June to August, training will be given to at least 200 farmers and their relatives.
Output indicators (targeted results)	Awareness will be created among farmers and workers.

Timeline and Deadline Date	2023 August
Input (budget/resources)	One full-time social worker, one temporary social workers training costs
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager)

Child Labor

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	CL.1	In Compliance	
Minimum Age	CL.2	In Compliance	
Immediate Family Members	CL.3	In Compliance	
Right to Education	CL.4.1 (PR)	In progress	All farms
Young Workers	CL.5	In Compliance	
	CL.6.1	Noncompliance	Farms 6,7,10,11,12,13
	CL.6.2	Noncompliance	Farms 6,7,10,11,12,13
	CL.7	Noncompliance	All farms
Apprenticeships and Vocational Training	CL.8.1 (PR)	Not Applicable	
	CL.8.2 (PR)	Not Applicable	
Children on Premises	CL.9	In Compliance	
Removal and Rehabilitation of Child Laborers	CL.10.1	In Compliance	
	CL.10.2 (PR)	In progress	All farms

Child Labor Assessment Summary

Notable Good Practices (if any)

The Company started a schooling program in the assessment area with TEGV. They have a mobile education unit (truck) within the scope of this program that aims to support children learning about science and other vital subjects.

Young Workers

Benchmarks	Compliance Status
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. CL.6.2: Employers shall maintain a list of all young workers, their entry dates, proof of age, and description of their assignment. 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.	Noncompliance in Farms 6,7,10,11,12,13 In All Farms
Findings/Noncompliance Explanation	Farmers who employ young workers in their gardens do not know the working conditions of young workers. Young workers work in the same conditions as adults.
Company Action Plan	

Activity	The worker and farmer training module will be updated. More detailed information will be given in the section on the young labor force. The definition of the young worker, working hours, light/heavy work, and occupational health and safety issues will be explained in more detail. In addition, young workers' conditions will be determined. A handbook will be prepared for farmers and workers. The working conditions of young workers will be detailed in this handbook.
Output indicators (targeted results)	Awareness will be created among farmers and workers. Works for young workers will be defined.
Timeline and Deadline Date	2023 August
Input (budget/resources)	Two full-time agricultural engineer and one full-time social worker, one temporary social workers training costs, and the cost of the farmer handbooks.
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager) Bünyamin SİVRİ (agricultural engineer) Serkan TANRIVERMİŞ (agricultural engineer)

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	In Compliance	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	Farms 9,10,11,15
	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	All farms
	HSE.9.2.1	Risk of Noncompliance	All farms
	HSE.10	Not Applicable	
	HSE.11.1	In Compliance	All farms
Protection Reproductive Health	HSE.11.2	In Compliance	All farms
	HSE.12.1	In Compliance	All farms
Infrastructure	HSE.12.2 (PR)	Not Applicable	
	HSE.13 (PR)	Not Applicable	
	HSE.17.1	In Compliance	All farms
	HSE.17.2 (PR)	Not initiated	All farms
	HSE.19 (PR)	In progress	Farm 8,11,12
	HSE.21 (PR)	In progress	All farms
Machinery Safety	HSE.22 (PR)	In progress	1,2,4,5,13
	HSE.14.1	Not Applicable	
	HSE.14.2	Not Applicable	
	HSE.14.3	Not Applicable	
Ergonomics and Medical Facilities	HSE.14.4	Not Applicable	
	HSE.15.2 (PR)	Not initiated	All farms
	HSE.16.2	Risk of Noncompliance	All farms

Health Safety and Environment Assessment Summary

Notable Good Practices (if any)
<p>The Company has provided two portable toilets for placement on outlying farms for the needs of workers. However, these could not be placed yet during the assessment due to the flood in previous weeks.</p> <p>An agreement was made with the district health department for worker trainings, and their personnel accompanied the trainings. District Health Department personnel informed workers about what to do in case of work accidents. Health screenings for workers were conducted as well.</p>

General Compliance	
Benchmarks	Compliance Status
HSE.1: Employers shall comply with all national laws, regulations, and procedures concerning health, safety, and the environment.	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	<p>The Company communicated general information to the farmers, and farmers were found to have basic knowledge about health and safety issues.</p> <p>However, they do not verify if there is a pregnant, ill worker or any person with disabilities among the workers they hire. They also do not know the related regulations. Furthermore, there is no procedure related to health and safety issues.</p>
Company Action Plan	
Activity	<p>There is an occupational health and safety procedure. Health and safety issues will be added to the procedure.</p> <p>A Worker Registration Form has been created to determine whether there are young, sick, or pregnant workers.</p>
Output indicators (targeted results)	The procedure will be updated.
Timeline and Deadline Date	2023 August
Input (budget/resources)	One full-time social worker and one temporary social worker's training costs
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager)

Evacuation Requirements and Procedure	
Benchmarks	Compliance Status
HSE.5.2: Where appropriate, workers shall be trained in evacuation procedures at least once per year.	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	<p>The area is reported as not having any earthquake risk. However, the farmers' land is divided over wide areas, and they said it is impossible to have firefighting equipment on all farms.</p> <p>The only major reported risk in the area is the flood (Ünye Region) and landslide (mainly at farm 2). When the rain starts, the workers stop working and return to their accommodations. None of the farms have emergency or evacuation procedures.</p>
Company Action Plan	

Activity	Flood and landslide issues, the region's biggest problems, will be added to occupational health and safety trainings. At least 200 farmers and 500 workers will be trained on these issues in the Unye district. In the handbook to be prepared, information about the precautions to be taken regarding such risks will be added.
Output indicators (targeted results)	The training module will be updated. A handbook will be prepared.
Timeline and Deadline Date	2023 August
Input (budget/resources)	Two full-time agricultural engineers and one full-time social worker, one temporary social worker's training costs, and the cost of the farmer's handbooks.
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager) Bünyamin SIVRİ (agricultural engineer) Serkan TANRIVERMİŞ (agricultural engineer)

Chemical Management	
Benchmarks	Compliance Status
HSE.9.2: All chemicals and hazardous substances shall be properly labeled 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. 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.	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	<p>Not all farmers have proper agrochemical storage. Monitors have witnessed that the Company provided signs for chemical storage but not all farmers have placed these properly. However, there is progress regarding this issue compared to the past.</p> <p>The monitor has not found any MSDS. In many farms, agrochemical substances are mainly used before the harvest period. The awareness for disposing of empty agrochemical containers was high. All farmers were aware of safe disposal methods.</p> <p>Farmers or their adult family members deal with the handling and application of agrochemicals. There is no worker present that deals with chemicals and hazardous substances. The workers the monitor interviewed said they only carry out harvesting, which consists of collecting the hazelnuts and sometimes carrying the sacks.</p>
Company Action Plan	
Activity	<p>Pesticide warehouses will be defined for all farmers. Defined signs will be hung at these warehouse entrances.</p> <p>Trainings on the disposal of empty pesticide boxes will continue in the 2023 period. Trainings will be given to at least 200 farmers and their families.</p> <p>The List of Licensed and Prohibited Medicines will be updated and placed in the file of all farmers and distributed.</p> <p>In our Whatsapp group, applications related to drugs 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. At least 200 farmers and their families will be trained on this subject.</p> <p>Protective clothing and equipment will be distributed to all farmers by hanging signs with spraying times in the farmers' gardens, and training will be provided on how to use them.</p>

Output indicators (targeted results)	The awareness of the couples will increase. Farmer files will be updated.
Timeline and Deadline Date	2023 August
Input (budget/resources)	Two full-time agricultural engineer training costs and cooperation costs, garbage container and signage costs
Responsible staff (title/department)	Bünyamin SiVRi (agricultural engineer) Serkan TANRIVERMiş (agricultural engineer)

Ergonomics and Medical Facilities	
Benchmarks	Compliance Status
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 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.	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	There is no responsible person identified for any health case. Generally, the farmer takes the ill person to the medical facilities by vehicle, and there is no emergency plan to access the medical facilities.
Company Action Plan	
Activity	A document has been created on what to do in an emergency. The document will be updated. Farmers and workers will be trained in this regard. At least 200 farmers and their families and 500 workers will be trained on this subject.
Output indicators (targeted results)	Awareness will be created among farmers and workers.
Timeline and Deadline Date	2023 August
Input (budget/resources)	Two full-time agricultural engineers and one full-time social worker, one temporary social worker's training costs
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager) Bünyamin SiVRi (agricultural engineer) Serkan TANRIVERMiş (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	Risk of Noncompliance	Farms 2,6,8
	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)	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	
Public Holidays and Leave	HOW.8.1	Noncompliance	All farms
	HOW.8.2	Noncompliance	All farms
	HOW.8.3	Not Applicable	
	HOW.9	Not Applicable	
	HOW.10.1	Not Applicable	
	HOW.11 (PR)	Not Applicable	
	HOW.12.1 (PR)	Not initiated	All farms
	HOW.12.2 (PR)	In Compliance	
	HOW.13	Noncompliance	All farms
	HOW.14	Not initiated	All farms
	HOW.15 (PR)	Not Applicable	
	HOW.16 (PR)	Noncompliance	All farms

Hours of Work Assessment Summary

General Compliance	
Benchmarks	Compliance Status
<p>HOW.1.1: Employers shall comply with all national laws, regulations, and procedures concerning hours of work, public holidays, and leave.</p> <p>HOW.1.2: 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 days; and (4) shall be fully compensated according to legal requirements or worker agreements, whichever is more favorable to workers.</p>	<p>Noncompliance in all farms</p>
<p>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.</p>	<p>Risk of Noncompliance in Farms 2,6,8</p>
<p>Findings/Noncompliance Explanation</p> <p>Neither farmers nor employees know the national laws, regulations, and procedures concerning hours of work, public holidays, and leave on assessed gardens.</p> <p>The working hours change between 07:00-18:00 for six migrant worker groups and 08:00-18:00 for two migrant and seven local worker groups. The break times change from 1,5 to 2 hours. There is one hour break for lunch in every garden. When break times were subtracted, the daily working hours were 9,5 for three migrant groups, 9 hrs for the other three migrant groups, 8,5 hours for one local worker group, and 8 hrs for eight groups (2 migrant and six local groups). This makes weekly working hours range between; 56 and 66,5 hrs. The monitors observed that some workers and farmers were aware of regulations about working hours limited to 8 hours, informed by the supervisors. Still, the monitors found that the working hours are generally above 8.</p> <p>The workers work between 20 to 30 days without rest unless the weather is rainy. The workers are granted an unpaid rest day if the weather is rainy.</p>	
<p>Company Action Plan</p>	
<p>Activity</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</p>

	<p>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. Practices and procedures regarding working hours, permits, and rest periods will be given to workers and farmers. In addition, 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. Compliance will be encouraged if the Commission's decision is not complied with.</p> <p>A handbook on working hours will be prepared. In addition, the regulation on working hours will be mentioned. This handbook will be distributed to all workers and farmers.</p>
Output indicators (targeted results)	Awareness will be created among farmers and workers.
Timeline and Deadline Date	2023 August
Input (budget/resources)	Two full-time agricultural engineers and one full-time social worker, one temporary social worker's training costs, and the cost of the farmer's handbooks.
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager) Bünyamin SIVRİ (agricultural engineer) Serkan TANRIVERMİŞ (agricultural engineer)

Protected Workers (pregnant or nursing women, young workers)	
Benchmarks	Compliance Status
<p>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.</p> <p>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.</p>	Noncompliance in all farms
Findings/Noncompliance Explanation	It is indicated in the national law that working hours for pregnant and nursing workers as 7,5 hours daily and 8 hours for young workers. However, the young and pregnant workers worked the same hours (up to 9,5 hours a day) as adult workers. The regulation is not implemented for protected and disadvantaged workers.
Company Action Plan	
Activity	<p>The procedure will be updated, including the working conditions of working under special conditions. This procedure will be explained to all farmers and workers.</p> <p>Whether there is a young worker, a disabled or a pregnant worker in the group that comes to raise awareness on the issue, the worker registration form will be updated and used.</p> <p>Working conditions of pregnant and young workers will be added to the work handbook.</p>
Output indicators (targeted results)	<p>Awareness will be created among farmers and workers.</p> <p>The procedure will be updated.</p> <p>The form will be updated.</p>
Timeline and Deadline Date	2023 August
Input (budget/resources)	One full-time social worker, one temporary social worker's training costs, and the cost of the farmer handbooks.

Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager)
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Overtime

Benchmarks	Compliance Status
<p>HOW.5.1: Where national laws, regulations, and procedures allow it, employers may calculate regular hours of work as an average for 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>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.</p> <p>HOW.6.2: All overtime work shall be voluntary.</p> <p>HOW.7: Employers shall be able to provide an 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>	Noncompliance in all farms

Findings/Noncompliance Explanation	<p>There is no awareness of working and overtime hours among farmers and workers.</p> <p>The worker groups work more than 48 regular hours per week (between 56 and 66,5 hrs). These workers are not paid for any overtime hours above the legal regular working hours.</p> <p>The farmers and workers verbally agree on total days of work against the agreed daily wage without calculation of premium for any overtime hour. The workers have to accept this deal to work on the farm.</p> <p>Overtime is not voluntary but obligatory and not paid. The interviewed workers stated that the working hours are long.</p>
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Company Action Plan

Activity	A field study covering workers, workers, and local administrations regarding working on the hours announced by the Commission will be carried out. The root of this problem will be clarified.
Output indicators (targeted results)	Field research will be conducted.
Timeline and Deadline Date	2023 August
Input (budget/resources)	Two full-time agricultural engineers and, one full-time social worker, one temporary social worker's research costs
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager) Bünyamin SİVRİ (agricultural engineer) Serkan TANRIVERMİŞ (agricultural engineer)

Public Holidays and Leave

Benchmarks	Compliance Status
<p>HOW.8.1: Employers shall provide workers with all official public holidays as required under national laws, regulations, and procedures.</p> <p>HOW.8.2: 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 refuse.</p> <p>HOW.14: Employers shall provide workers with sick leave as required under national laws, local provisions, regulations, and procedures.</p> <p>HOW.15: Employers shall not impose any undue restrictions on sick leave. Any workplace restrictions or procedures regarding sick leave (e.g., informing the employer as soon as possible, the provision of medical certificates, the use of designated doctors or hospitals) must be in line with national laws, regulations, and procedures and must be communicated in full to all workers.</p>	Noncompliance in all farms

Findings/Noncompliance Explanation	<p>There is no implementation of rights of public holidays, sick leave, or rest days for workers in assessed farms. If a worker is ill, s/he can go home to rest or is taken to the hospital as unpaid leave.</p> <p>Since no permanent or long-term work is applicable in the hazelnut harvest employment, annual leave is not applicable.</p>
Company Action Plan	
Activity	<p>Since there is no permanent and long-term work in the hazelnut harvest, there is no annual leave, and lobbying activities will be carried out to improve this area.</p> <p>Working hours will be added to the work handbook, and contracted work will be expanded.</p>
Output indicators (targeted results)	<p>Lobbying activities will support local government.</p> <p>A handbook will be prepared</p> <p>Contract jobs will become widespread.</p>
Timeline and Deadline Date	2023 August
Input (budget/resources)	Two full-time agricultural engineers and one full-time social worker cost and cost of the farmer handbooks.
Responsible staff (title/department)	<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	
	C.1.2	Risk of Noncompliance	Farms 1,2,6,7,9,10,11
	C.1.3	Risk of Noncompliance	All farms
	C.1.4	Not initiated	All farms
Minimum Wage/Fair Compensation	C.2.1	Risk of Noncompliance	Farms 1,2,4,5,6,7,8,11
	C.2.2	Noncompliance	All farms
	C.2.3	In Compliance	
	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	
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.7.2	Risk of Noncompliance	All farms
	C.7.3 (PR)	Not initiated	All farms
	C.7.4 (PR)	Not initiated	All farms
	C.7.5	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	
	C.10.1.1	Not Applicable	

	C.10.2	Not Applicable	
	C.10.3	Not Applicable	
Workers Awareness	C.11.1.1	Noncompliance	
	C.11.1.2	Not Applicable	
	C.11.1.3	In Compliance	
	C.11.1.4	Not Applicable	
	C.11.1.5	Risk of Noncompliance	All farms
	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	Not Applicable	

Compensation Assessment Summary

Notable Good Practices (if any)
<p>This year, a 300% increase was observed in transportation costs compared to last year due to hyperinflation in Türkiye and high fuel prices worldwide. For this reason, agricultural business intermediaries reported that the number of workers coming to the region was 40% less than last year. This labor shortage increased the bargaining power of agricultural labor intermediaries. For this reason, they reported adding the transportation cost to the daily minimum wage, and farmers agreed to this. As a result, seasonal workers will be paid more than the minimum daily wage for the first time this year.</p>

General Compliance	
Benchmarks	Compliance Status
<p>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> <p>C.1.3: 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>	<p>Risk of Noncompliance in Farms 1,2,6,7,9,10,11 In all farms</p>
<p>Findings/Noncompliance Explanation</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 that farm since the labor contractor reaches an agreement with the farmer a couple of months before the harvest. Both farmers and workers know the deduction.</p> <p>Even if the farmers say that they will pay the workers 250TL per day, seasonal worker groups do not know how much they will receive due to the unknown deduction amount because of the Commission of the labor contractor. The labor contractor can abuse this situation. Therefore, seasonal agricultural workers are at risk of being paid below the minimum daily wage.</p>	
<p>Company Action Plan</p>	
<p>Activity</p>	<p>The most important step to prevent this interruption is to labor contractors. In this direction, we are carrying out the Harvesting The Future project carried out by the FLA. We find and map undocumented labor contractors at harvest times. We hold talks with İŞKUR during the term, provide training to labor contractors and support them in obtaining the labor contractor certificate. So far, we have had 25 labor contractors get labor contractor certificates. This year, we will train three labor</p>

	contractors in January and support them in obtaining this certificate. It is aimed to prevent these cuts with the trainings we will give to a labor contractor.
Output indicators (targeted results)	Awareness will be raised among labor contractors. The labor contractor will be mapped and documented.
Timeline and Deadline Date	2023 January
Input (budget/resources)	One full-time social worker training costs and certificate cost
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager)

Minimum Wage/Fair Compensation	
Benchmarks	Compliance Status
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 minimum 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.	Risk of Noncompliance in Farms 1,2,4,5,6,7,8,11
Employers shall not set production targets at such a level that workers must work beyond regular working hours as set under the FLA Workplace Code, excluding overtime, to achieve at least the minimum wage.	Noncompliance in all farms
Findings/Noncompliance Explanation	<p>The local Commission announced the daily legal minimum wage as 216 TL for agricultural workers, based on the national minimum wage announced by the Ministry of Labor and Social Security. However, in all assessed farms, the assessors reported that farmers would agree to pay at least 250 TL to the workers. The labor contractors will deduct 10% of the seasonal migrant worker's wages.</p> <p>Farmers pay the labor contractors, so the farmers do not follow how much is paid to the workers afterward. There were groups of workers who did not know how much they would receive.</p> <p>The reason for paying above the minimum wage this year is the rise in travel costs. The minimum travel cost is 1200TL from a worker's hometown to the Black Sea. Workers work for approximately 30 days in hazelnut farming. This means that the average daily travel costs are 40TL.</p> <p>$250\text{TL (daily wage)} - 40\text{TL (Travel cost)} - 25\text{TL (intermediary deduction)} = 185\text{TL}$, which falls below the minimum legal wage of 216 TL. Therefore, the assessors considered this a risk.</p>
Company Action Plan	
Activity	The most important step to prevent this interruption is to labor contractors. In this direction, we are carrying out the Harvesting The Future project carried out by the FLA. We find and map undocumented labor contractors at harvest times. We hold talks with İŞKUR during the term, provide training to labor contractors and support them in obtaining the labor contractor certificate. So far, we have had 25 labor contractors get labor contractor certificates. This year, we will train three labor contractors in January and support them in obtaining this certificate. It is aimed to prevent these cuts with the trainings we will give to a labor contractor.
Output indicators (targeted results)	Awareness will be raised among labor contractors. The labor contractor will be mapped and documented.
Timeline and Deadline Date	2023 January
Input (budget/resources)	One full-time social worker training costs and certificate cost

Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager)
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Wage Payment and Calculation

Benchmarks	Compliance Status
<p>C.7.2: FLA affiliates shall ensure that farmers/producers receive payments and certification premiums through a traceable and reliable payment system.</p> <p>C.8.1: Employers shall compensate workers for all hours worked.</p> <p>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 upon by the workers to work on holidays and rest days for short-term seasonal work, which would make this provision not applicable.</p> <p>C.8.3: Workers shall be informed in writing or orally, where necessary, in the language(s) spoken by workers, about overtime wage rates prior to undertaking overtime.</p>	Noncompliance in all farms
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.	Risk of noncompliance in all farms

Findings/Noncompliance Explanation	<p>All wages are paid upon completion of seasonal tasks. The farmers employ a workers' group for the harvest and pay them on completion of the season, often through the labor contractor or the supervisors. The total harvest period is about 20 to 30 days. The farmers pay all wages in cash.</p> <p>The assessors observed that four farmers had written agreements, and the remaining had just verbal agreements.</p> <p>The workers have not been informed about the overtime and overtime rates prior to agreeing to the overtime work. They are also not paid for overtime.</p> <p>The farmer agrees on a standard daily wage with labor contractors or workers without considering overtime payments.</p>
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Company Action Plan

Activity	It has been explained above.
Output indicators (targeted results)	<p>Awareness will be raised among labor contractors.</p> <p>The labor contractor will be mapped and documented.</p>
Timeline and Deadline Date	2023 January
Input (budget/resources)	One full-time social worker training costs and certificate cost
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager)

Workers Awareness

Benchmarks	Compliance Status
<p>C.11.1: Employers shall make every reasonable effort to ensure workers understand their compensation, including:</p> <p>C.11.1.1: the calculation of wages,</p>	Noncompliance in all farms
C.11.1.5: 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.	Risk of noncompliance in all farms

Findings/Noncompliance Explanation	Most of the workers are 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 prior to starting their work. However, the local workers also do
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	not know their wages 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.
Company Action Plan	
Activity	The wage determined by the Commission will be announced to all local and seasonal workers. It is aimed to raise awareness of at least 500 workers throughout the season.
Output indicators (targeted results)	Awareness will be raised among farmers and workers.
Timeline and Deadline Date	2023 August
Input (budget/resources)	One full-time social worker training costs
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager)