



Independent External Monitoring Agriculture Report, 2022

Fair Labor Association conducts an Independent External Monitoring (IEM) assessment when a company has begun implementing 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	Yavuz Gida
Country	Türkiye
Crop	Hazelnut
Production process	Harvest
Assessment location	Türkiye, Zonguldak, Alapli
Monitor	Asya Control Certifications & Consultancy
Assessment dates	10,12,14 August 2022
Number of assessed farms	15
Total area covered	69.82
Number of farmers interviewed	15
Total number of workers	212
Number of workers interviewed	96

Employment Relationship

Compliance Status

Section	Benchmark	Compliance status	Farms
Human Resource Management System	ER.1.1	Noncompliance	All farms
	ER.2.1 (PR)	Not initiated	All farms
	ER.2.1.1 (PR)	Not initiated	All farms
Recruitment and Hiring	ER.3.1	Noncompliance	3,5,7,10,12,13,15
	ER.3.1.1	Noncompliance	3,5,7,10,12,13,15
	ER.3.1.2	Noncompliance	3,5,7,10,12,13,15
	ER.4	Noncompliance	2,6,7,8,9,10
	ER.5.1	Noncompliance	2,6,7,8,9,10
	EA.5.2	Noncompliance	2,6,7,8,9,10
	ER.5.3	Not Applicable	All farms
	ER.6 (PR)	Not initiated	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	All farms
	ER.7.7	Noncompliance	All farms
ER.7.8	Not Applicable	All farms	
Terms and Conditions	ER.9.1	Risk of Noncompliance	1,2,3,4,5,6,7,8,9,14
	ER.9.2.1	Noncompliance	All farms
	ER.9.2.2	Not Applicable	All farms
	ER.9.2.3	Noncompliance	All farms
	ER.9.3.1	Risk of Noncompliance	All farms
	ER.9.3.2	Risk of Noncompliance	All farms
	ER.9.3.3	Risk of Noncompliance	All farms
	ER.10	Not Applicable	
	ER.11	Noncompliance	2,5,6,7,8,10,14,15 (young workers)
	ER.12.1	Noncompliance	All farms
	ER.12.1.1	Noncompliance	All farms
	EA.12.2	Not Applicable	A
	ER.13.1	Noncompliance	All farms except 8,12,13
ER.13.2 (PR)	Not initiated	All farms	
ER.13.3 (PR)	Not initiated	All farms	
Administration	EA.15.1	Risk of Noncompliance	1,3,4,6,8
	EA.15.2	Risk of Noncompliance	1,3,4,6,8
	ER.15.2.1	Risk of Noncompliance	1,3,4,6,8
	ER.16.1	In Compliance	
	ER.16.2	In Compliance	
	ER.17.2 (PR)	In compliance	
	ER.17.3 (PR)	In compliance	
	ER.17.4 (PR)	In compliance	
Worker Involvement	ER.18.1	Risk of Noncompliance	1,2,3,5,6,7,8,9,10,14
	ER.18.2 (PR)	In progress	1,2,3,5,6,7,8,9,10,14
Right to Organize and Bargain	ER.19	Not Applicable	
Work Rules and Discipline	EA.20.1	Not Applicable	All farms
	EA.20.2	Noncompliance	All farms
	ER.20.3 (PR)	Not initiated	All farms

	EA.20.4	Noncompliance	All farms
	EA.20.6	Noncompliance	All farms
	EA.20.7	Noncompliance	All farms
	EA.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	1,2,3,4,5,6,8,9,10,11,14,15
HSE Management System	ER.24.1.	Noncompliance	All farms
	ER.24.2 (PR)	In progress	All farms
	ER.24.3	Noncompliance	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)	Not initiated	All farms
	ER.24.4.4 (PR)	Not initiated	All farms
	ER.24.4.5 (PR)	Not initiated	All farms
	ER.24.4.6 (PR)	Not initiated	All farms
	ER.24.5 (PR)	In progress	All farms
Grievance Procedures	ER.25.1 (PR)	In progress	All farms
	ER.25.2 (PR)	In progress	All farms
	ER.25.3	Risk of Noncompliance	All farms
	ER.25.4	Risk of Noncompliance	All farms

Employment Relationship Assessment Summary

Notable Good Practices (if any)

The Booklet published by the Company contains all FLA CoC, and it is easy to understand with an illustrative design.

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.	Noncompliance in all farms
<p>Findings/Noncompliance Explanation</p> <p>Farmers have no written terms and conditions. Collecting the hazelnut from the ground or branch is the main business activity in the hazelnut harvest. In addition, filling the hazelnuts in sacks and transferring them to the vehicles can be a part of this task. Apart from these, the workers do not have jobs such as spraying, pruning, and cleaning the soil. The workers were verbally informed about working hours and conditions. However, the net amount they will receive at the end of the harvest/their work is unknown, except for local workers.</p> <p>The local authority announced the daily net minimum wage as 216 TL in 2022, and the farmers said they would pay the compensation accordingly. The Company reports that the farmers must have paid 240-260TL to regional workers based on their records. Still, cross-checked information during the assessment shows that farmers, workers, and labor contractors agreed for workers to work for the daily net minimum wage (216TL) announced by the local commission. Their work started in the gardens based on this agreement.</p>	
Company Action Plan	

Activity	Within the scope of the human resources management system, for farmers to inform the workers, a brochure stating the written terms and conditions will be made and distributed to the workers.
Output indicators (targeted results)	Awareness of workers ' rights Knowing the definition of the work to be done by the workers
Timeline and Deadline Date	2022 December – 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer)
Responsible staff (title/department)	Mehmet Esat iSMaIL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability) Zeynep KILIÇ (Agricultural Engineer / Sustainability)

Recruitment and Hiring	
Benchmarks	Compliance Status
<p>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.</p> <p>ER.3.1.1: Employers shall take reasonable measures to ensure such documentation is complete and accurate.</p> <p>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.</p>	<p>Noncompliance in Farms 3,5,7,10,12, 13,15</p>
<p>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.</p> <p>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 provided for directly hired contract workers apply to workers hired via an employment agency or labor intermediary.</p> <p>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.</p>	<p>Noncompliance in Farms 2,6,7,8,9,10</p>
<p>ER.7: Employers may hire temporary, casual, daily, seasonal, or migrant workers only when:</p> <p>ER.7.6: contract, temporary, casual, daily, seasonal, or migrant workers receive at least the minimum wage or the prevailing industry wage, whichever is higher, and all legally mandated benefits such as social security, other forms of insurance, annual leave, and holiday pay;</p> <p>ER.7.7: farm rules and regulations apply to contract, temporary, casual, daily, seasonal, or migrant workers the same as for permanent workers;</p>	<p>Noncompliance in All Farms</p>
Findings/Noncompliance Explanation	<p>Farmers no 1 and 2 only checked workers' identity if they doubted the worker's age. Farmers nos 6,8,9,11,14 conduct age verification by looking at workers' identities. Other farmers did not check the ages.</p> <p>It was determined that in 6 of the 11 farms, farmers were working with seasonal migrant worker groups. These groups were recruited through a labor intermediary, and he/she received commissions from the daily earnings of the workers.</p> <p>In farm no 9, the farmer employed seasonal agricultural workers and kept their identities with him until the completion of their work (see below, Forced Labor section for more information).</p> <p>Farmers who employ seasonal agricultural workers pay the minimum daily wage of 216TL to the workers through labor intermediaries. Workers stated that the labor contractor commission is 10% of their daily wages in the worker interviews, but they did not know how much money they would receive at the end of the job. The Company reports that the farmers must have paid 240-260TL to regional workers based on their records. Still,</p>

	<p>cross-checked information during the assessment shows that farmers, workers, and labor contractors agreed for workers to work for the daily net minimum wage (216TL) announced by the local commission. Their work started in the gardens based on this agreement.</p> <p>In previous years, it has been seen that local worker groups have lower working hours and are paid more daily wages. Also, the accommodation conditions of seasonal migrant workers employed in many visited gardens require improvement.</p> <p>Local or seasonal migrant workers do not receive legally mandated benefits such as social security or other forms of insurance.</p> <p>Source: interviews & Observations</p>
Company Action Plan	
Activity	<p>Farmers, workers, and agricultural intermediaries will be trained within the Yavuz food age procedure.</p> <p>It is common practice for agricultural intermediaries to make a 10% cut. Deductions are made from workers working in all product groups except hazelnut agriculture. In this context, training will be provided to agricultural intermediaries.</p> <p>During the 2023 hazelnut season, all FLA registered farmers, at least 40 agricultural intermediaries, and 750 workers will be trained.</p>
Output indicators (targeted results)	<p>Identification of child and youth workers</p> <p>Raising awareness of age determination and deduction</p> <p>Reduction of the number of workers with 10% deductions</p>
Timeline and Deadline Date	2022 December – 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer)
Responsible staff (title/department)	<p>Mehmet Esat İSMAİL (Sustainability Coordinator / Sustainability)</p> <p>Aslı BULTAN (Agricultural Engineer / Sustainability)</p> <p>Zeynep KILIÇ (Agricultural Engineer / Sustainability)</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:</p> <p>ER.9.2.1: provisions of national laws;</p> <p>ER.9.2.3: the FLA Workplace Code.</p> <p>ER.12.1: Employers shall regularly inform workers about workplace rules, health and safety information, and laws regarding workers' rights for 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>ER.12.1.1: Employers shall inform workers that any form of harassment or abuse in the workplace shall be subject to disciplinary measures.</p>	<p>Noncompliance in all farms</p>
<p>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 farms 2,5,6, 7,8, 10,14,15 (young workers)</p>

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.	Noncompliance All farms except 8,12,13
ER.9.1: Workers should be made aware of the employment terms under which they are engaged.	Risk of Noncompliance in Farms 1 to 9 and 14
ER.9.3: There can be no employment terms (including in written or verbal contracts or any other instruments or in any formal or informal recruitment arrangements) which allow employers: ER.9.3.1: to hold wages already earned; or ER.9.3.2: use earned back wages as penalties; and ER.9.3.3: in any way punishes workers for terminating employment.	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	<p>Seasonal workers in all gardens are verbally informed about their work for 10-20 minutes before the start of the work. Farmers discuss the wages of seasonal workers only with their supervisor or labor intermediary.</p> <p>Since the terms of employment are not based on any written contract, the farmer can terminate the workers' employment at any time without paying their wages. None of the interviewed farmers withheld the workers' wages or used this as a penalty. However, farmers who did not like certain workers' performance and ceased to work with them reported that they paid those workers' earned wages.</p> <p>No pregnant or disabled workers were seen during the worker interviews. However, workers below 18 years old were spotted. It has been observed that young workers work the same hours as adult workers and do the same jobs.</p> <p>It was seen that the Company did not organize any worker training activities this year by the time of the assessments (they reported that they conducted 250 trainings in all their region by the end of Harvest). Also, they published a booklet on this subject and that it would be distributed during the Harvest. However, at the time of the interviews, none of the interviewed workers had received this Booklet. The Company stated that it was the beginning of the harvest season, and the working groups had just arrived, so booklets would be distributed to the worker groups shortly. Additionally, the Company stated they conducted training 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 training in collaboration with two other hazelnut companies. Four of these trainings specifically targeted women.</p> <p>It has been observed that farmers who are newly involved in the FLA program have low awareness of labor rights compared to those who are more experienced with the program.</p> <p>Source: Documentation, interviews & observation</p>
Company Action Plan	
Activity	<p>In the 2022 harvest period, the Harvest of 357 farmers was visited, and 1399 hazelnut workers distributed the Booklet of the Yavuz hazelnut agricultural project; information was provided on wages and working conditions.</p> <p>A contract covering the FLA code has been signed for all farmers under the FLA.</p>

	For the 2023 hazelnut season, the FLA aims to inform all our farmers, at least 40 agricultural intermediaries, and at least 750 hazelnut workers in this context.
Output indicators (targeted results)	Improvement of employment conditions Improving working conditions for young workers Increasing awareness of the FLA code
Timeline and Deadline Date	2022 December – 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer)
Responsible staff (title/department)	Mehmet Esat İSMAİL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability) Zeynep KILIÇ (Agricultural Engineer / Sustainability)

Administration	
Benchmarks	Compliance Status
<p>ER.15.1: If consistent with prevailing labor practices, the employer may make advance payments or advances against payment to the workers to book their time. Wage advances shall not exceed three months' pay or legal limits, whichever is less. The farmer will not pay advances or loans against assets such as jewels, property documents, land deeds, and other valuables of the worker. These advances shall be interest-free and cannot bind the worker as bonded labor.</p> <p>ER.15.2: Advances shall only be made following clearly established rules, which have been communicated to workers.</p> <p>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).</p>	<p>Risk of Noncompliance in Farms 1,3,4,6,8</p>
Findings/Noncompliance Explanation	<p>Workers usually receive their wages at the end of the job. However, if the worker needs or requests any payment before the end date, the amount paid by the employer will be deducted from their compensation. They verbally agree to these terms; there is no payment documentation.</p> <p>Türkiye is experiencing a currency crisis with serious economic and social repercussions in 2022. As a result of the deepening economic crisis, high inflation, and the increase in fuel prices, transportation expenses were raising conflicts among the worker groups. Under these circumstances, advance payments in Farms 1,3,4,6,8 were made to cover the workers' one-way transportation costs. However, there are no contracts or written statements noting these advance payments. Therefore, both the employee and the employer are at risk in case of a future disagreement.</p> <p>Source: Interviews & observation</p>
Company Action Plan	
Activity	Within the scope of the advance payment, it is aimed to provide training/information to all farmers under the FLA, at least 40 agricultural intermediaries, and at least 750 hazelnut workers.
Output indicators (targeted results)	Raising awareness about wages and advances
Timeline and Deadline Date	2022 December – 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer)
Responsible staff (title/department)	Mehmet Esat İSMAİL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability) Zeynep KILIÇ (Agricultural Engineer / Sustainability)

Worker Involvement	
Benchmarks	Compliance Status
ER.18.1: Employers shall have a clear and transparent system of worker and employer communication that enables workers to consult with and provide input to the employer or the company management. This might include regular conversations between workers and employers, suggestion boxes, workers' committees, designated spaces for worker meetings, and meetings between employer and workers' representatives. Workers can openly reach and communicate with the producer/farmer for small farms with informal labor structures.	Risk of Noncompliance in 1,2,3,5, 6,7,8, 9,10,14
Findings/Noncompliance Explanation	In general, workers and farmers are not in direct dialogue. Instead, the farmer conveys the demands to the workers through the supervisor or labor contractor. Only break and meal times are determined, taking their words into account and directly communicating with them. Communication between the farmer and local worker groups is more open and direct. Source: Interviews & observations
Company Action Plan	
Activity	Since hazelnut farming is within the scope of small land, the working time with the worker is small. For this reason, worker communication and interviews are carried out by agricultural intermediaries. Farmers and hazelnut workers will be informed about this. (2023 It is aimed to reach all FLA farmers, at least 40 agricultural intermediaries, and at least 750 workers for the season.)
Output indicators (targeted results)	Increasing communication between farmers and worker
Timeline and Deadline Date	2022 December - 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer)
Responsible staff (title/department)	Mehmet Esat ISMAİL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability) Zeynep KILIÇ (Agricultural Engineer / Sustainability)

Work Rules and Discipline	
Benchmarks	Compliance Status
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	Farmers have no written disciplinary rules, and practices embody a system of progressive discipline (e.g., maintaining discipline through escalating disciplinary action moving from verbal warnings to written warnings to suspension and finally to termination). The widely applied disciplinary rule is to terminate the worker's employment. In these cases, the farmers pay their earned wages up to that date.

	Source: Interviews & observations
Company Action Plan	
Activity	All FLA farmers will be informed of the disciplinary rules. In addition, this issue is included in the Yavuz sustainability agriculture project booklet, and farmers and workers will be informed throughout the year.
Output indicators (targeted results)	Ensuring the orderly functioning of the disciplinary system
Timeline and Deadline Date	2022 December – 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer)
Responsible staff (title/department)	Mehmet Esat İSMAİL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability) Zeynep KILIÇ (Agricultural Engineer / Sustainability)

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 in all farms except 7, 12,13
Findings/Noncompliance Explanation	<p>Since the farmers are generally over 60 years old, it was seen that their sons often lead hazelnut farming-related activities. This is especially the case if their father's health status is insufficient. The male lead of the family often participates in the trainings. Their wives participate in the trainings, in exceptional cases, in a limited number of gardens. The Company delivered trainings to 1672 persons in all their regions in 2022. Out of this number, 109 of them were women.</p> <p>Source: Interviews & observations</p>
Company Action Plan	
Activity	In the 2023 hazelnut season, activities will be organized for women farmers and male farmers' wives in the villages where we work within the scope of FLA. It is aimed to ensure the participation of 300 women producers and/or their spouses in the trainings.
Output indicators (targeted results)	Increasing Women's Power Increasing women's right to speak in hazelnut farming
Timeline and Deadline Date	2022 December – 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer)
Responsible staff (title/department)	Mehmet Esat İSMAİL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability) Zeynep KILIÇ (Agricultural Engineer / Sustainability)

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. ER.24.3: Employers shall have a designated responsible person for HSE issues on the farm. For small farms, this could be the responsibility of the farmer directly.	Noncompliance in all farms

Findings/Noncompliance Explanation	<p>The Company stated that they organized training in Şanlıurfa before the 2022 Harvest, and HSE was one of the main training topics. Also, it was observed that workers who attended worker training in the past years state that they still recall highlights and key points about health, safety, and environmental topics. However, the monitors came across a very limited number of these workers. The educational Booklet prepared by the Company for workers and farmers is informative material that could reach many workers. Still, the Company was just starting to distribute them at the time of this assessment.</p> <p>The hazelnut farms are small, and no designated person is responsible for HSE issues in these farms. Some farmers inform the workers before they start to work on the farms. However, it was observed that they do not provide detailed explanations or directions. They are likelier to give simple warnings such as "Do not slip, do not fall, watch your eyes."</p> <p>Source: Documentation, interviews & observations</p>
Company Action Plan	
Activity	During the 2022 hazelnut harvest period, 357 farmer harvests were visited, and 1399 workers were informed by distributing the Yavuz hazelnut sustainable hazelnut agriculture project booklet. Information activities will continue during the period.
Output indicators (targeted results)	Raising awareness of health, safety, and the environment
Timeline and Deadline Date	2022 December – 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer)
Responsible staff (title/department)	Mehmet Esat İSMAİL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability) Zeynep KILIÇ (Agricultural Engineer / Sustainability)

Grievance Procedures	
Benchmarks	Compliance Status
ER.25.3: FLA-affiliated companies shall make sure that a confidential noncompliance reporting mechanism is available for farmers and workers in the supply chain (such as members of cooperatives or suppliers of seed organizers). Through this channel, any code violation can be communicated to the Company in the event that the local and farm-level grievance redress mechanisms fail to sufficiently address the issue. ER.25.4: The Company shall create awareness of this communication and noncompliance reporting mechanism to its service providers and suppliers.	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	<p>Workers and farmers are unaware of a "confidential noncompliance reporting mechanism" offered by the Company.</p> <p>Farmers stated that they tend to convey their complaints and requests directly, in person, to Yavuz Gıda agricultural engineers. Workers would contact their supervisor or labor intermediary or call the state's emergency phone lines or the gendarmerie if they have a complaint. They do not have any information about grievance channels (hotline, online) offered by Yavuz Gıda.</p> <p>Source: Documentation, interviews & observations</p>
Company Action Plan	

Activity	There are five methods within the scope of Yavuz food suggestion, request, and complaint procedure. One of these methods is to notify the agricultural engineer. It is aimed to carry out poster and/or brochure activities on four methods other than informing the agricultural engineer.
Output indicators (targeted results)	Increasing awareness of grievance mechanism methods
Timeline and Deadline Date	2022 December – 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer)
Responsible staff (title/department)	Mehmet Esat iSMaIL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability) Zeynep KILIÇ (Agricultural Engineer / Sustainability)

Non-discrimination

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	ND. 1	Noncompliance	1,3,6,9,10
Recruitment and Employment Practices	ND.2.1	Noncompliance	1,2,3,4,6,7,9,10,15
	ND.2.3	Noncompliance	All farms
Compensation Discrimination	ND. 3	Noncompliance	2,6,7,8,9,10
Discrimination in Training and Communication	ND. 4	In Compliance	
Marital or Pregnancy-Related Discrimination	ND.5.1	Noncompliance	All farms
	ND.5.2	Risk of Noncompliance	1,6,9
	ND.5.3	Risk of Noncompliance	1,6,9
	ND.6.1	Noncompliance	All farms
	ND.6.1.1	Noncompliance	All farms
Health-Related Discrimination	ND. 7	Not Applicable	
	ND.8	Not Applicable	
	ND. 9	Not Applicable	
Respect of Culture and Religion	ND.11	In Compliance	

Non-Discrimination Assessment Summary

General Compliance	
Benchmarks	Compliance Status
ND.1: Employers shall comply with all national laws, regulations, and procedures concerning non-discrimination.	Noncompliance in farms 1,3,6,9,10
Findings/Noncompliance Explanation	The farmers could not directly respond to what discrimination is. When probed, they said they would not discriminate against workers based on religion, language, or race. However, they do not include age, gender, disability, or special conditions (such as pregnancy) in this list. Source: Interview & observations

Company Action Plan	
Activity	It is aimed to inform all FLA farmers, at least 40 agricultural intermediaries, and at least 750 workers about discrimination.
Output indicators (targeted results)	Raising awareness about discrimination Knowledge of discrimination
Timeline and Deadline Date	2022 December – 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer)
Responsible staff (title/department)	Mehmet Esat İSMAİL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability) Zeynep KILIÇ (Agricultural Engineer / Sustainability)

Recruitment and Employment Practices	
Benchmarks:	Compliance Status
ND.2.1: Recruitment and employment practices shall be free from any type of discrimination.	Noncompliance in farms 1,2,3,4, 6, 7,9,10,15 In all farms
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.	
Findings/Noncompliance Explanation	<p>At farm no 1, the farmer stated that he would not work with pregnant workers. At farm no 3, the farmer stated that he would not work with married women and workers over 30.</p> <p>At farms 6 and 9, the farmers stated that they would not employ pregnant workers and wanted to work with workers between 18 and 40 years.</p> <p>At farm no 10, the farmer said he is also the village headman and does not usually prefer working with seasonal agricultural workers since they are not hardworking enough.</p> <p>Source: Interview & observations</p>

Company Action Plan	
Activity	It is aimed to inform all FLA farmers, at least 40 agricultural intermediaries, and at least 750 workers about discrimination.
Output indicators (targeted results)	Raising awareness about discrimination Knowledge of discrimination
Timeline and Deadline Date	2022 December – 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer)
Responsible staff (title/department)	Ayşe KÖSE GOLOĞLU (Assistant General Manager / Sustainability) Mehmet Esat İSMAİL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability)

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 farms 2,6,7,8,9,10
Findings/Noncompliance Explanation	<p>Seasonal migrant workers and local workers are not paid equally. The minimum wage reported to be paid to seasonal migrant workers is 216 TL, whereas the local workers get 250 TL. There is no solid evidence or calculation shown for this difference by the farmers. For some, local workers are more familiar with the commodity and work more efficiently and quickly, but they do not base their perception on evidence. Others explain it with additional costs associated with employing seasonal migrant workers (e.g., providing accommodation).</p> <p>Furthermore, it should be noted that most of the seasonal worker groups are hired through labor intermediaries. So, they receive even less than this minimum wage after a 10% deduction.</p> <p>In addition, it has been observed that seasonal migrant workers were working longer hours (10-11 hours/per day) than local workers (8-9 hours/per day).</p> <p>Please see the "Wage Payment and Calculation" section for more information.</p> <p>Source: Interviews & observations</p>	
Company Action Plan		
Activity	<p>According to our Alaplı district governorship customs and traditions, it is announced that the working hours are between 07:00-19:00. For this reason, lobbying efforts will continue.</p> <p>In the decision taken by the district governors on remuneration, seasonal and local workers' wages are explained differently. For this reason, lobbying will continue within the scope of this issue.</p>	
Output indicators (targeted results)	<p>Enabling the authorities to be informed and act in this context</p> <p>Allowing decisions taken by local authorities to make lawful decisions on wages and working hours</p>	
Timeline and Deadline Date	2022 December - 2023 September	
Input (budget/resources)	Human Resources (Agricultural Engineer)	
Responsible staff (title/department)	<p>Ayşe KÖSE GOLOĞLU (Assistant General Manager / Sustainability)</p> <p>Mehmet Esat İSMAİL (Sustainability Coordinator / Sustainability)</p> <p>Aslı BULTAN (Agricultural Engineer / Sustainability)</p>	

Marital or Pregnancy-Related Discrimination	
Benchmarks	Compliance Status
<p>ND.5.1: Employers shall not require pregnancy testing of female workers except as required by legal health and safety provisions.</p> <p>In cases that it is required by law, employers shall not use (the results of) such tests as a condition of hiring or continued employment.</p> <p>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 unborn children or new mothers and their newborn children, temporary adjustment of working hours during and after pregnancy, and the provision of breastfeeding breaks and facilities.</p>	Noncompliance in all farms

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.		
ND.5.2: Employers shall not threaten female workers with dismissal or any other employment decision that negatively affects their employment status in order to prevent them from getting married or becoming pregnant. ND.5.3: Employers shall not, on the basis of a woman's pregnancy, make any employment decisions that negatively affect a pregnant woman's employment status, including decisions concerning dismissal, loss of seniority, or deduction of wages.		Risk of Noncompliance in Farms 1,6,9
Findings/Noncompliance Explanation	<p>At farm no 1, the farmer stated that he would not work with pregnant workers. At farm no 3, the farmer stated that he would not work with married women and workers over 30.</p> <p>At farms 6 and 9, the farmers stated that they would not employ pregnant workers and wanted to work with workers between 18 and 40 years.</p> <p>Farmers are not informed about the working conditions of special groups such as pregnant or breastfeeding women. Few farmers said they would give them lighter work, but they do not know their legal working hours.</p> <p>Source: Interview & observations</p>	
Company Action Plan		
Activity	It is aimed to inform all FLA farmers, at least 40 agricultural intermediaries, and at least 750 workers about discrimination.	
Output indicators (targeted results)	Raising awareness about discrimination Knowledge of discrimination	
Timeline and Deadline Date	2022 December – 2023 September	
Input (budget/resources)	Human Resources (Agricultural Engineer)	
Responsible staff (title/department)	Mehmet Esat İSMAİL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability) Zeynep KILIÇ (Agricultural Engineer / Sustainability)	

Harassment or Abuse

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	H/A.1.1	Noncompliance	All farms
	H/A.1.2	Risk of Noncompliance	2,6,4,9
Discipline	H/A.2	In Compliance	
	H/A.3	In Compliance	
	H/A.4	Risk of Noncompliance	4.9
	H/A.5	Risk of Noncompliance	2.6
	H/A.6	In Compliance	
	H/A.7	In Compliance	

	H/A.13	Risk of Noncompliance	4,6,9,10,15
Violence	H/A.8.1	Risk of Noncompliance	2,6,4,9
	H/A.8.2	Risk of Noncompliance	2,6,4,9
	H/A.8.3	Risk of Noncompliance	2,6,4,9
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	
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.	Noncompliance in all farms
H/A.1.2: Workers at the farm shall not be subject to any corporal punishment, sexual harassment, oppression, coercion, or any other kind of mental or physical abuse or intimidation, disregarding whether they are family members without a formal contract or hired staff.	Risk of Noncompliance in Farms 2,4,6,9
Findings/Noncompliance Explanation	Farmers (including their family members) and workers are not aware of this issue. Farmers are not informed about this subject's laws, regulations, or procedures. Please see below "Discipline" for identified risks. Source: Interviews & observations
Company Action Plan	
Activity	In this context, it is aimed to inform all FLA farmers, at least 40 agricultural intermediaries, and at least 750 workers.
Output indicators (targeted results)	Raising awareness of discipline by all actors
Timeline and Deadline Date	2022 December – 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer)
Responsible staff (title/department)	Mehmet Esat İSMAİL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability) Zeynep KILIÇ (Agricultural Engineer / Sustainability)

Discipline	
Benchmarks	Compliance Status

<p>H/A.4: Employers shall not use any form of – or threat of – physical violence, including slaps, pushes, or other forms of physical contact, as a means to maintain the discipline of workers, disregarding whether they are family members without a formal contract or hired staff.</p> <p>H/A.5: Employers shall not use any form of verbal violence, including screaming, yelling, or the use of threatening, demeaning, or insulting language, as a means to maintain discipline, disregarding whether they are family members without a formal contract or hired staff.</p> <p>H/A.13: Employers shall only apply corrective measures and discipline which are well explained to workers and are with the intention of continuous improvement</p>		<p>Risk of Noncompliance in Farms 2,6</p> <p>In farms 4,6,9,10,15</p>
Findings/Noncompliance Explanation	<p>The monitors witnessed cases of verbal abuse, specifically yelling (in farm 2, the farmer's wife was yelling at the female workers) and cursing (In farm 6, the farmer's brother was witnessed cursing loudly at the workers) at workers.</p> <p>Furthermore, in some cases, shared anecdotes (in farm 4, the farmer said that he had hit the female workers with a stick, who had talked among themselves and neglected the job several years ago) and statements (in farm 9, the farmer said that if the worker continued with mistakes despite the verbal warning, he would teach by beating) signaled the risk of physical violence and punishment.</p> <p>Source: Interviews & observations</p>	
Company Action Plan		
Activity	Informing about bad behavior and harassment through posters and brochures works	
Output indicators (targeted results)	Reducing the negative behaviors that may occur between farmers and workers	
Timeline and Deadline Date	2022 December – 2023 September	
Input (budget/resources)	Human Resources (Agricultural Engineer)	
Responsible staff (title/department)	Mehmet Esat İSMAİL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability) Zeynep KILIÇ (Agricultural Engineer / Sustainability)	

Violence		
Benchmarks	Compliance Status	
<p>H/A.8.1: Employers shall ensure that the workplace is free from any type of violence, harassment, or abuse, be it physical, sexual, psychological, verbal, or otherwise. This also applies to workers who are brought to the farm by employers, labor contractors, or service providers.</p> <p>H/A.8.2: Employers shall refrain from any action and shall take all appropriate action to ensure that all workers refrain from any action that would result in an intimidating, hostile, or offensive work environment for workers.</p> <p>H/A.8.3: If not provided under law, employers must provide protection to workers who allege harassment or abuse violations.</p>	<p>Risk of Noncompliance in Farms 2,4,6,9</p>	
Findings/Noncompliance Explanation	Please see the above "Discipline" for identified risks.	
Company Action Plan		
Activity	Informing about bad behavior and harassment through posters and brochures works	
Output indicators (targeted results)	Reducing the negative behaviors that may occur between farmers and workers	

Timeline and Deadline Date	2022 December – 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer)
Responsible staff (title/department)	Mehmet Esat iSMaIL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability) Zeynep KILIÇ (Agricultural Engineer / Sustainability)

Forced Labor

Compliance Status

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

Forced Labor Assessment Summary

General Compliance	
Benchmarks	Compliance Status
F.1: Employers shall comply with all national laws, regulations, and procedures concerning the prohibition of forced labor and human trafficking in any stage of the agriculture production process.	Noncompliance in Farm 9
Findings/Noncompliance Explanation	At farm no 9, the farmer said that he kept all the workers' identities with him and that workers could not move. He stated that he wanted to ensure workers would not leave the provincial borders before finishing their jobs, which was a measure of security for him. He said he would help if they needed their ID (e.g., when a worker has to go to the hospital, the farmer would take him and bring his ID).

	Source: Documentation & interviews
Company Action Plan	
Activity	It is aimed to inform all our FLA farmers about the scope of forced labor.
Output indicators (targeted results)	Reducing the behavior of farmers within the scope of forced labor, restriction of workers' freedom of movement, and ability to terminate their employment
Timeline and Deadline Date	2022 December – 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer)
Responsible staff (title/department)	Mehmet Esat İSMAİL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability) Zeynep KILIÇ (Agricultural Engineer / Sustainability)

Freedom in Employment and Movement

Benchmarks	Compliance Status
F.7: Employers shall not utilize practices that restrict workers' freedom of movement or ability to terminate their employment. Examples of such practices include, but are not limited to: F.7.5: denying and hampering access to, and renewal of, identity papers and/or work permits or any other personal legal (identification) documents;	Noncompliance in Farm 9
F.2: All workers shall have the right to enter into and terminate their employment freely.	

Findings/Noncompliance Explanation	Please see above.
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Company Action Plan

Activity	It is aimed to inform all our FLA farmers about the scope of forced labor.
Output indicators (targeted results)	Reducing the behavior of farmers within the scope of forced labor, restriction of workers' freedom of movement, and ability to terminate their employment
Timeline and Deadline Date	2022 December – 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer)
Responsible staff (title/department)	Mehmet Esat İSMAİL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability) Zeynep KILIÇ (Agricultural Engineer / Sustainability)

Personal Workers Identification and Other Documents

Benchmarks	Compliance Status
F.9: Workers shall retain possession or control of their passports, identity papers, travel documents, and other personal legal documents. Employers may obtain copies of original documents for record-keeping purposes or as ID substitutes.	Noncompliance in Farm 9

Findings/Noncompliance Explanation	Please see above
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Company Action Plan

Activity	It is aimed to inform all our FLA farmers about the scope of forced labor.
Output indicators (targeted results)	Reducing the behavior of farmers within the scope of forced labor, restriction of workers' freedom of movement, and ability to terminate their employment
Timeline and Deadline Date	2022 December – 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer)
Responsible staff (title/department)	Mehmet Esat İSMAİL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability) Zeynep KILIÇ (Agricultural Engineer / Sustainability)

Child Labor

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	CL.1	Noncompliance	7,9
Minimum Age	CL.2	Noncompliance	7,9
Immediate Family Members	CL.3	In Compliance	
Right to Education	CL.4.1 (PR)	In progress	All farms
Young Workers	CL.5	Noncompliance	2,5,6,7,8,10,14,15
	CL.6.1	Noncompliance	2,5,6,7,8,10,14,15
	CL.6.2	Noncompliance	2,5,6,7,8,10,14,15
	CL.7	Noncompliance	2,5,6,7,8,10,14,15
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	Noncompliance	7,9
	CL.10.2 (PR)	In progress	All farms

Child Labor Assessment Summary

Notable Good Practices (if any)

The Company is carrying out a safe space/summer school project for the children of seasonal agricultural workers between the ages of 4-18 in the village of Asagidag in the district of Alapli in Zonguldak. With the sponsorship of the Company, stationery materials, lunch, and transportation support are provided. In addition, teachers are recruited to run the system.

The labor intermediary, who had recruited workers for farm no 2, stated that he knew that there was a safe space/summer school for children in the region, and he informed the workers and their parents about it.

General Compliance

Benchmarks	Compliance Status
CL.1: Employers shall comply with all national laws, ratified international conventions, fundamental labor rights, regulations, and procedures concerning the prohibition of child labor.	Noncompliance in farms 7, 9
Findings/Noncompliance Explanation	In farms 7 and 9, children under the age of 15 were employed:

	<ul style="list-style-type: none"> • Farm no 7: 2 male children (one aged 13 years old and the other 14 years old), • Farm no 9: 1 male child (aged 13 years old) <p>They received the same daily wage as the adult workers.</p> <p>Source: Interview & observations</p>
Company Action Plan	
Activity	<p>In the 2022 hazelnut harvest, it was expected our Company that the number of child workers would increase in the harvest due to the economic problems experienced by our country. For this reason, in farmer, worker, and agricultural intermediary training, informative activities have been given importance within the scope of this subject.</p> <p>In the 2022 hazelnut harvest, summer school activities were carried out by our Company in 3 regions (Ordu, Zonguldak, Sakarya). As a result, summer school activities will be continued according to the need.</p>
Output indicators (targeted results)	<p>Reducing child labor</p> <p>Raising awareness of child labor among farmers, workers, and agricultural intermediaries</p>
Timeline and Deadline Date	2022 December - 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer), Summer Schools
Responsible staff (title/department)	<p>Ayşe KÖSE GOLOĞLU (Assistant General Manager / Sustainability)</p> <p>Mehmet Esat İSMAİL (Sustainability Coordinator / Sustainability)</p> <p>Aslı BULTAN (Agricultural Engineer / Sustainability)</p>

Minimum Age	
Benchmarks	Compliance Status
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 an insufficiently developed economy and educational facilities, employers might follow national legislation but must work to progressively raise the minimum age to 15 years.	Noncompliance in farms 7, 9
Findings/Noncompliance Explanation	<p>During the garden visits, it was observed that there was a large group of children at the farm no 7. It was observed that some of them were the farmer's grandchildren, and they did not work during the visit. Other children were informed during interviews that they were harvesting hazelnuts from the ground, and monitors received confirmation from relatives and other seasonal workers working at the farm (please see above for their ages).</p> <p>At farm no 9, when monitors detected a case of child labor. The father was nearby, and he confirmed his child's age (please see above for his age). On the other hand, the farmer reported that he was not in the garden during their hiring, and the worker brought his child to work without the farmer's knowledge. The farmer and his wife confirmed that they had employed children in the past but did not want to employ children anymore as they could not harvest like adults.</p> <p>Source: Interview & observations</p>
Company Action Plan	

Activity	<p>In the 2022 hazelnut harvest, it was expected our Company that the number of child workers would increase in the harvest due to the economic problems experienced by our country. For this reason, in farmer, worker, and agricultural intermediary training, informative activities have been given importance within the scope of this subject.</p> <p>In the 2022 hazelnut harvest, summer school activities were carried out by our Company in 3 regions (Ordu, Zonguldak, Sakarya). As a result, summer school activities will be continued according to the need.</p>
Output indicators (targeted results)	<p>Reducing child labor</p> <p>Raising awareness of child labor among farmers, workers, and agricultural intermediaries</p>
Timeline and Deadline Date	2022 December – 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer), Summer Schools
Responsible staff (title/department)	<p>Ayşe KÖSE GOLOĞLU (Assistant General Manager / Sustainability)</p> <p>Mehmet Esat İSMAIL (Sustainability Coordinator / Sustainability)</p> <p>Aslı BULTAN (Agricultural Engineer / Sustainability)</p>

Young Workers	
Benchmarks	Compliance Status
<p>CL.5: Employers shall abide by all relevant rules and procedures where the law requires government permits or permission from parents as a condition of employment of young workers.</p> <p>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.</p> <p>CL.6.2: Employers shall maintain a list of all young workers, their entry dates, proof of age, and a description of their assignment.</p> <p>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 applying agricultural chemicals, pesticides, and fertilizers, using farm equipment tools and machinery, lifting or moving heavy materials or goods, or carrying out hazardous tasks such as underground, underwater, or at dangerous heights. An adult must supervise every activity performed by a young worker.</p>	<p>Noncompliance in farms 2,5,6,7, 8,10,14,15</p>
Findings/Noncompliance Explanation	<p>According to the decision of the Alaplı District Governor's Office, the age of employment is determined as 16-65. However, it was observed that the definition of young workers and working hours for any age group were not determined in the decision.</p> <p>It was observed that the concept of a "young worker" was not known. Young workers did not deal with agrichemicals, but they worked in the same conditions as adults (for 10 hours between 7:00 and 19:00, taking a break for about 2 hours), doing the same jobs (including bending branches and harvesting hazelnuts on steep slopes). Farmers do not note down young workers during the age verification process to ensure that they work under the conditions defined in the laws.</p> <p>Young workers without parents were detected at the farm no 2.</p> <p>Source: Observation & interviews</p>
Company Action Plan	
Activity	As stated in the statement, lobbying efforts will continue since the concept of "Young Worker" is not known by the district governorships.

	The concept of young workers is aimed to inform all our FLA farmers of at least 40 agricultural intermediaries and 750 workers.
Output indicators (targeted results)	Learning the concept of young worker Determination of working conditions of young workers
Timeline and Deadline Date	2022 December – 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer)
Responsible staff (title/department)	Ayşe KÖSE GOLOĞLU (Assistant General Manager / Sustainability) Mehmet Esat İSMAİL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability)

Removal and Rehabilitation of Child Laborers	
Benchmarks	Compliance Status
CL.10.1: If a child laborer is found working on a farm, all relevant downstream suppliers, including the participating Company, shall immediately assess the situation at the child's household level and shall engage with relevant stakeholders to find a sustainable remediation solution that is in the best interest of the child.	Noncompliance in farms 7, 9
Findings/Noncompliance Explanation	<p>When monitors detected child labor cases, they immediately informed the Company staff so they could take action. The Company staff reported that they went to mentioned farms to take remediating actions.</p> <p>However, after their visits, the Company staff reported that they did not see any children working at the farms since they returned home before their arrival. As a result, they could not take any remediation action.</p>
Company Action Plan	
Activity	<p>In the 2022 hazelnut harvest, it was expected our Company that the number of child workers would increase in the harvest due to the economic problems experienced by our country. For this reason, in farmer, worker, and agricultural intermediary training, informative activities have been given importance within the scope of this subject.</p> <p>In the 2022 hazelnut harvest, summer school activities were carried out by our Company in 3 regions (Ordu, Zonguldak, Sakarya). As a result, summer school activities will be continued according to the need.</p>
Output indicators (targeted results)	Reducing child labor Raising awareness of child labor among farmers, workers, and agricultural intermediaries
Timeline and Deadline Date	2022 December – 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer), Summer Schools
Responsible staff (title/department)	Ayşe KÖSE GOLOĞLU (Assistant General Manager / Sustainability) Mehmet Esat İSMAİL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability)

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HSE.1.	Noncompliance	1,2,3,4,5,6,7,8,10,11,14,15
Document Maintenance, Permits, and Certificates	HSE.2 (PR)	In progress	All farms
	HSE.3.1	In Compliance	
	HSE.4 (PR)	Not initiated	All farms
Evacuation Requirements and Procedure	HSE.5.1 (PR)	Not initiated	All farms
	HSE.5.2	Noncompliance	All farms
Safety Equipment and First Aid	HSE.6.1 (PR)	In progress	3,4,6,7,10,11,15
	HSE.6.2 (PR)	Not initiated	All farms
	HSE.16.3 (PR)	In progress	3,4,6,7,10,11,15
Personal Protective Equipment	HSE.7 (PR)	In progress	All farms
	HSE.8	Risk of Noncompliance	All farms
Chemical Management	HSE.9.1	In Compliance	
	HSE.9.2	Noncompliance	2,3,4,5,6,7,9,10,11,14,15
	HSE.9.2.1	In Compliance	
	HSE.10	In Compliance	
	HSE.11.1	In Compliance	
Protection Reproductive Health	HSE.11.2	In Compliance	
	HSE.12.1	Risk of Noncompliance	All farms
Infrastructure	HSE.12.2 (PR)	Not initiated	All farms
	HSE.13 (PR)	In progress	1,5,8,9,10
	HSE.17.1	In Compliance	All farms
	HSE.17.2 (PR)	In progress	Half of the farms
	HSE.19 (PR)	In progress	1,5,8,9,10
	HSE.21 (PR)	Not initiated	All farms
	HSE.22 (PR)	In progress	3,4,14,15 Risky transportation method
Machinery Safety	HSE.14.1	Not Applicable	
	HSE.14.2	Not Applicable	
	HSE.14.3	Not Applicable	
	HSE.14.4	Not Applicable	
Ergonomics and Medical Facilities	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)

Farmers no 8 explained that they carried out a joint project with the support of the Company to provide clean drinking water to workers. Within this project's scope, clean drinking water was provided not only to this farmer's land but also to other farms on the road to deliver the water. In addition, the Company provided a 1000 m water pipeline for irrigation.

Farmer no 14 visited Sanliurfa, the city of origin of the working group he hired. He was impressed by how they had treated him as a guest, and his perspective on seasonal agricultural workers changed. As a result, he decided to improve the conditions at the house he provided to workers during their stay. This year, he renewed the house allocating a renovation budget of 35000 TL. Both the workers and the farmer seemed very happy during the interviews.

At farms 3 and 4, it was heard that the main reason for the working group to work in these farms was that the accommodation areas were very good.

The Company distributed 4000 promotions, including hygiene kits, to workers across their regions, including Zonguldak-Alapli.

General Compliance	
Benchmarks	Compliance Status
HSE.1: Employers shall comply with all national laws, regulations, and procedures concerning health, safety, and the environment.	Noncompliance in farms 1 to 11, 14, 15
Findings/Noncompliance Explanation	<p>It was observed that the farmers had little knowledge of this subject. In the health, occupational safety, and environment sections of the booklet distributed by the Company, information that will increase the awareness of both workers and farmers are explained in simple language and with pictures. This document can be a valuable source whenever they have questions or want to refresh their memories. However, none received this booklet during the assessment for the above reasons.</p> <p>Source: Interview & observations</p>
Company Action Plan	
Activity	<p>The 2022 hazelnut harvest coincides with the start date of the workers' work. For this reason, the booklets were distributed to 1399 workers with the audit.</p> <p>The booklet and information work will continue in the 2023 hazelnut harvest.</p>
Output indicators (targeted results)	Raising awareness of health, safety, and the environment
Timeline and Deadline Date	2022 December - 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer)
Responsible staff (title/department)	<p>Mehmet Esat İSMAİL (Sustainability Coordinator / Sustainability)</p> <p>Aslı BULTAN (Agricultural Engineer / Sustainability)</p> <p>Zeynep KILIÇ (Agricultural Engineer / Sustainability)</p>

Evacuation Requirements and Procedure	
Benchmarks	Compliance Status
HSE.5.2: Where appropriate, workers shall be trained in evacuation procedures at least once per year.	Noncompliance in all farms
Findings/Noncompliance Explanation	<p>It was observed that natural disasters such as floods and landslides occurred in the region at different times, but the farmers did not have any emergency plans or measures in this regard. Only at the farm, no 6, did the farmer mention that they had designated a gathering area in case of disaster or heavy rain.</p> <p>Workers have little or no awareness of this issue.</p> <p>Source: Interview & observations</p>
Company Action Plan	
Activity	It aims to inform all FLA farmers, at least 40 agricultural intermediaries, and 750 workers within the scope of what needs to be done in case of emergency.

Output indicators (targeted results)	Knowing the steps to be taken in case of emergency Rapid handling of what needs to be done in an emergency Farmers and workers overcome incidents with the least damage
Timeline and Deadline Date	2022 December – 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer)
Responsible staff (title/department)	Mehmet Esat İSMAİL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability) Zeynep KILIÇ (Agricultural Engineer / Sustainability)

Personal Protective Equipment	
Benchmarks	Compliance Status
HSE.8: Workers shall be provided with training on the use and maintenance of personal protective equipment.	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	The Company provides PPE and training in March-April, the agricultural spraying period for farmers. However, monitors understood from interviews that no training or PPE was provided to workers by the time of this assessment. Source: Interview & observations
Company Action Plan	
Activity	During the 2022 harvest period, the workers' arrival dates to the region and the inspection date are the same. For this reason, education could not be questioned in the audit. After the inspection, 1399 workers were trained in this regard until the harvest was completed and personal protective equipment was distributed. At least 40 agricultural intermediaries and 750 workers will be trained.
Output indicators (targeted results)	Increasing the importance of the use of personal protective equipment Minimizing the negative events that will occur
Timeline and Deadline Date	2022 December – 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer)
Responsible staff (title/department)	Mehmet Esat İSMAİL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability) Zeynep KILIÇ (Agricultural Engineer / Sustainability)

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.	Noncompliance in farms 2, 3, 4, 5, 6, 7, 9,10,11, 14, 15

Findings/Noncompliance Explanation	Eleven farmers do not know how to safely dispose of agrochemicals. Source: Interview & observations
Company Action Plan	
Activity	All FLA farmers will be trained on the disposal of chemicals.
Output indicators (targeted results)	Environmental protection Minimizing the harm of chemicals to human health
Timeline and Deadline Date	2022 December - 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer)
Responsible staff (title/department)	Muhammed EFİL (Agricultural Engineer / Sustainability) Sezer GÜVEN (Agricultural Engineer / Sustainability) Ufuk GÜNEŞ (Agricultural Engineer / Sustainability) Olca YURT (Agricultural Engineer / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability) Zeynep KILIÇ (Agricultural Engineer / Sustainability)

Protection Reproductive Health	
Benchmarks	Compliance Status
HSE.12.1: Employers shall ensure that women are not engaged in work that constitutes a substantial risk to their reproductive health.	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	The scope of the harvest work, which female workers perform, did not directly affect female fertility. The female workers were not dealing with carrying heavy bags or applying agrochemicals. However, in the visited gardens, female workers were not asked whether they were pregnant before being given a job. Source: Interview & observations
Company Action Plan	
Activity	Within the scope of the working conditions of pregnant women, brochure or booklet work will be done.
Output indicators (targeted results)	Raising awareness
Timeline and Deadline Date	2022 December - 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer)
Responsible staff (title/department)	Mehmet Esat İSMAİL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability) Zeynep KILIÇ (Agricultural Engineer / Sustainability)

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 access to medical treatment.		Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	<p>There is no pre-determined responsible person for medical emergencies; there is no procedure for emergencies.</p> <p>Farmers said that if a worker is sick or has an accident, the farmers can take him/her to the hospital. When asked about the distance of the nearest health institution to hazelnut gardens, it was reported that a health center is 1-3 km away, and a state hospital can be reached in 5-10 km.</p>	
Company Action Plan		
Activity	Within the scope of what needs to be done in case of emergency, it is aimed to inform at least 40 agricultural intermediaries and 750 workers of all our FLA producers.	
Output indicators (targeted results)	Knowing what to do in case of an emergency	
Timeline and Deadline Date	2022 December – 2023 September	
Input (budget/resources)	Human Resources (Agricultural Engineer)	
Responsible staff (title/department)	Mehmet Esat iSMaIL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability) Zeynep KILIÇ (Agricultural Engineer / Sustainability)	

Hours of Work

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HOW.1.1	Noncompliance	All farms
	HOW.1.2	Noncompliance	1,2,3,4,5,6,7,8,9,10,14
	HOW.1.3	Noncompliance	1,2,3,4,5,6,7,8,9,10,14
	HOW.1.4	In Compliance	All farms
Rest Day	HOW.2	Not Applicable	
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 except Farm 12
	HOW.5.2 (PR)	Not initiated	All farms except Farm 12
	HOW.6.1	Noncompliance	All farms except Farm 12
	HOW.6.2	Noncompliance	All farms except Farm 12
	HOW.6.3 (PR)	Not initiated	All farms except Farm 12
	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	All farms
HOW.13	Not Applicable	All farms
HOW.14	Not initiated	All farms
HOW.15 (PR)	Not Applicable	
HOW.16 (PR)	Not Applicable	

Hours of Work Assessment Summary

General Compliance	
Benchmarks	Compliance Status
HOW.1.1: Employers shall comply with all national laws, regulations, and procedures concerning hours of work, public holidays, and leave.	Noncompliance in all farms
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-day period; and (4) shall be fully compensated according to legal requirements or worker agreements, whichever is more favorable to workers. 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.	Noncompliance in farms 1,2,3,4,5, 6,7,8,9,10,14
Findings/Noncompliance Explanation	<p>Farmers have no information about the labor law. They only consider the decision announced every year by the local Commission. However, farmers were familiar with the decisions taken by the Alaplı District Governor's Office in 2022. Article 4 of this decision specifies the working age as 16-65. It is written in Article 5 that the minimum daily wage will be paid. However, no information about working hours was mentioned in the decision.</p> <p>The legal working hours of a worker in Türkiye are 48 hours per week. Therefore, working hours in a week are at most 60 hours provided it maxes 11 hours daily. Considering these data, seasonal agricultural workers work 10 hours a day and 70 hours a week. Except for the local worker groups, all groups worked between 07:00 and 19:00. At farms no 10, 11, 13, and 15, local worker groups worked between 08:00 and 19:00, while at farm no 12, it was seen that they worked between 09:00 and 18:30.</p> <p>Workers work without weekly 24-hour breaks when the climatic conditions are suitable (no rain to interrupt the work).</p> <p>Source: Interview, observation</p>
Company Action Plan	
Activity	Within the scope of working hours, Alaplı District Governorship has stated the working hours as 07:00 – 19:00 according to our customs and traditions. For this reason, training on working hours is not taken into consideration. Lobbying for working hours will continue.
Output indicators (targeted results)	Raising awareness of Turkish working hours government institutions Ensuring that the laws of Türkiye write the working hours in the published announcements
Timeline and Deadline Date	2022 December – 2023 September

Input (budget/resources)	Human Resources (Agricultural Engineer)
Responsible staff (title/department)	Mehmet Esat iSMaIL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability) Zeynep KILIÇ (Agricultural Engineer / Sustainability)

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
<p>Findings/Noncompliance Explanation</p> <p>Regulation on employment of pregnant or nursing women Article 9 states that pregnant or nursing employees cannot work more than seven and a half hours a day. The farmers do not know this regulation.</p> <p>Young workers work the same hours as adults and have the same tasks. Farmers do not know about the working conditions of young workers either. While no pregnant workers were observed in the gardens this year, many young workers were observed.</p> <p>Source: Interviews and observation</p>	
Company Action Plan	
Activity	Under the working conditions of pregnant and young workers, training will be provided to all FLA farmers and at least 40 agricultural intermediaries, and 750 workers.
Output indicators (targeted results)	Recognition of the rights of pregnant and young workers Ensuring that farmers protect the working conditions of pregnant and young workers
Timeline and Deadline Date	2022 December - 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer)
Responsible staff (title/department)	Mehmet Esat iSMaIL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability) Zeynep KILIÇ (Agricultural Engineer / Sustainability)

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 over a period of longer than one week, provided all formal and procedural requirements attached to the 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.5.2: Payment of overtime rates is unaffected by a calculation that spreads total hours over more than one week.</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>	Noncompliance in all farms except farm 12
<p>Findings/Noncompliance Explanation</p> <p>Only at farm no 12, the working hours of the workers are between 09:00 and 18:30. During the 9.5 hours of work in the garden, local workers take a break of 2 hours and work 7.5 hours a day, which complies with the law. In</p>	

	<p>all the remaining gardens, the workers work overtime and do not receive compensation for their overtime.</p> <p>Workers and farmers are unaware of the laws governing overtime hours. Employment hours by the employer in the region are between 07:00 and 19:00. In the interview with the workers, it was observed that they were not unhappy with such long working hours. Farmers have no problem employing workers for 10 hours, paying 7.5 hours' wages.</p> <p>Since seasonal agricultural workers are unaware of their legal rights and have been working these hours for years, they think these hours are normal. However, this is not voluntary but mandatory. As a result, workers are unaware that they are working overtime even though they are not paid.</p> <p>Source: Documentation, interviews, and observation</p>
Company Action Plan	
Activity	Within the scope of working hours, Alaplı District Governorship has stated the working hours as 07:00 – 19:00 according to our customs and traditions. For this reason, training on working hours is not taken into consideration. Lobbying for working hours will continue.
Output indicators (targeted results)	Raising awareness of Turkish working hours government institutions Ensuring that the laws of Türkiye write the working hours in the published announcements
Timeline and Deadline Date	2022 December – 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer)
Responsible staff (title/department)	Mehmet Esat İSMAİL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability) Zeynep KILIÇ (Agricultural Engineer / Sustainability)

Compensation

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	C.1.1	Noncompliance	All farms
	C.1.2	Noncompliance	2,6,7,8,9,10
	C.1.3	Noncompliance	2,6,7,8,9,10
	C.1.4	Not Applicable	
Minimum Wage/Fair Compensation	C.2.1	Noncompliance	2,6,7,8,9,10
	C.2.2	Noncompliance	2,6,7,8,9,10
	C.2.3	Noncompliance	1,2,3,5,6,7,8,9,10,14
	C.2.4 (PR)	Not initiated	All farms
	C.2.5 (PR)	Not initiated	2,6,7,8,9,10
	C.2.6 (PR)	Not initiated	All farms
	C.3	Not Applicable	
Farmer/Producer Income	C.4 (PR)	Not initiated	All farms
Wage Payment and Calculation	C.6	Noncompliance	1,2,3,5,6,7,8,9,10,14
	C.7.1	Noncompliance	All farms
	C.7.2	Noncompliance	All farms
	C.7.3 (PR)	Not initiated	All farms

	C.7.4 (PR)	Not initiated	All farms
	C.7.5	In Compliance	All farms
	C.8.1	Noncompliance	1,2,3,5,6,7,8,9,10,14
	C.8.2	Noncompliance	1,2,3,5,6,7,8,9,10,14
	C.8.3	Noncompliance	1,2,3,5,6,7,8,9,10,14
	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	1,2,3,5,6,7,8,9,10,14
	C.11.1.2	Not Applicable	All farms
	C.11.1.3	Noncompliance	1,2,3,5,6,7,8,9,10,14
	C.11.1.4	Noncompliance	1,2,3,5,6,7,8,9,10,14
	C.11.1.5	Noncompliance	1,2,3,5,6,7,8,9,10,14
Fringe Benefits	C.13 (PR)	Not initiated	All farms
	C.12.1	In Compliance	
	C.12.2 (PR)	Not initiated	All farms
	C.12.3	In Compliance	
	C.12.4	In Compliance	
	C.12.5	In Compliance	

Compensation Assessment Summary

General Compliance	
Benchmarks	Compliance Status
C.1.1: Employers shall comply with all national laws, Collective Bargaining Agreements in force, regulations, and procedures concerning the payment of compensation to workers.	Noncompliance in all farms
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. 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.	Noncompliance In farms 2,6,7,8,9,10
Findings/Noncompliance Explanation	<p>Farmers are not aware of the labor laws and regulations. However, farmers stated that they know that the daily worker's wage is 216 TL according to the decision of the district governor's office, and they will apply it. The Company reports that the farmers must have paid 240-260TL to regional workers based on their records. Still, cross-checked information during the assessment shows that farmers, workers, and labor contractors agreed for workers to work for the daily net minimum wage (216TL) announced by the local Commission. Their work started in the gardens based on this agreement.</p> <p>Interviews verified that the supervisor or the labor intermediary would make payments to the workers. In groups of workers working with labor intermediaries, the wages of workers will fall below the minimum daily wage and become 195 TL as they will deduce their Commission.</p> <p>The Company stated that they delivered training to 34 newly mapped labor contractors in 2022, and 5 of them renewed their registration with the Turkish Employment Agency due to these efforts. Therefore, it is accepted that training and certification are important steps in abolishing these practices.</p>

	Source: Documentation, interview & observations
Company Action Plan	
Activity	At least 40 agricultural intermediaries will be trained on compensation/deduction in the 2023 hazelnut harvest.
Output indicators (targeted results)	Ensuring full compensation of workers' wages Raising awareness of compensation/deduction Ensuring that workers are not deducted
Timeline and Deadline Date	2022 December – 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer)
Responsible staff (title/department)	Mehmet Esat İSMAİL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability) Zeynep KILIÇ (Agricultural Engineer / Sustainability)

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 minimal legal 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. C.2.2: Employers shall provide all legally required benefits to all workers.	Noncompliance in farms 2,6,7,8,9,10
C.2.3: Employers shall not set production targets at such a level that workers need to work beyond regular working hours as set under the FLA Workplace Code, excluding overtime, in order to achieve at least the minimum wage.	Noncompliance in farms 1,2,3,5,6, 7,8,9,10,14
Findings/Noncompliance Explanation	<p>It has been observed that seasonal migrant agricultural workers earn 216 TL while working 10 hours a day, while local agricultural workers earn 250 TL by working 9 hours. Moreover, it has been observed that most of the seasonal migrant worker groups are working through a labor intermediary. Therefore, workers' wages decrease to 195 TL with a 10% deduction (Commission of the labor intermediary).</p> <p>Young workers work the same hours as adults and receive the same wages.</p> <p>The Company reports that the farmers must have paid 240-260TL to regional workers based on their records. Still, cross-checked information during the assessment shows that farmers, workers, and labor contractors agreed for workers to work for the daily net minimum wage (216TL) announced by the local Commission. Therefore, their work started in the gardens based on this agreement.</p> <p>Source: Documentation, interview & observations</p>
Company Action Plan	
Activity	At least 40 agricultural intermediaries will be trained on compensation/deduction in the 2023 hazelnut harvest.
Output indicators (targeted results)	Ensuring full compensation of workers' wages Raising awareness of compensation/deduction

	Ensuring that workers are not deducted
Timeline and Deadline Date	2022 December – 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer)
Responsible staff (title/department)	Mehmet Esat iSMaIL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability) Zeynep KILIÇ (Agricultural Engineer / Sustainability)

Wage Payment and Calculation

Benchmarks	Compliance Status
<p>C.7.1: All payments to workers, including hourly wages, piecework, fringe benefits, and other incentives, shall be calculated, recorded, and paid in a manner that is convenient to workers (e.g., in cash, by bank transfer, or check).</p> <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.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.</p>	Noncompliance in all farms
<p>C.6: All wages, including payment for overtime, shall be paid within legally defined time limits. Where no time limits are defined by law, compensation shall be paid at least once a month or upon completion of a seasonal task that takes less than a month.</p> <p>When workers are hired through contractors, brokers, or external agencies, employers shall make sure that workers are paid according to the benchmark requirements.</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 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 farms 1,2,3,5,6,7, 8,9,10,14

Findings/Noncompliance Explanation	<p>Payments are made to the labor intermediary at the end of the work when workers are recruited through a labor intermediary. Workers are paid directly, or through the eldest male member of the group, through the parents or husband in domestic worker groups.</p> <p>Payments are made in cash. There are no contracts signed with workers.</p> <p>The farmer pays seasonal migrant worker groups with more than ten workers an additional wage for one cook and one supervisor.</p> <p>Local and seasonal migrant worker groups cover their meals. Seasonal migrant agricultural workers cover the cost from their hometown to the region themselves, which is about 15,000-20,000 TL round trip. Subtracting travel and meal costs and labor contractor commission, a worker would receive 2800 TL net income at the end of a month's work (This is assuming that the accommodation is provided by the farmer. If the worker has to stay in a tent. Additionally 200TL/per day tent fee has to be paid).</p> <p>On the other hand, farmers who employ local workers cover the transportation expenses of the workers from their homes to the hazelnut farm, which round trip is 600-800 TL/day. They only pay for their meals. Therefore, their net income is considerably higher compared to seasonal migrant workers.</p> <p>Source: Interview & observations</p>
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Company Action Plan

Activity	Training will be provided to all FLA farmers, at least 40 agricultural intermediaries, and 750 workers on Payment and Recruitment.
Output indicators (targeted results)	To ensure that unfairness in payment and recruitment is avoided
Timeline and Deadline Date	2022 December – 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer)
Responsible staff (title/department)	Mehmet Esat iSMaIL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability) Zeynep KILIÇ (Agricultural Engineer / Sustainability)

Workers Awareness	
Benchmarks	Compliance Status
C.11.1: Employers shall make every reasonable effort to ensure workers understand their compensation, including: C.11.1.1: the calculation of wages, C.11.1.3: fringe benefits, and C.11.1.4: bonuses they are entitled to at the workplace and under applicable laws. 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.	Noncompliance in farms 1,2,3,5,6,7,8,9,10,14
Findings/Noncompliance Explanation	The seasonal migrant agricultural worker groups are unaware of how much they will receive after work. They can't be sure what they will get after the labor intermediary's commission and travel expenses deductions. Source: Documentation, interviews, and observations
Company Action Plan	
Activity	At least 750 workers will be trained on the wage that the workers will receive.
Output indicators (targeted results)	To prevent wage fairness Ensuring timely and full payment of fees
Timeline and Deadline Date	2022 December – 2023 September
Input (budget/resources)	Human Resources (Agricultural Engineer)
Responsible staff (title/department)	Mehmet Esat iSMaIL (Sustainability Coordinator / Sustainability) Aslı BULTAN (Agricultural Engineer / Sustainability) Zeynep KILIÇ (Agricultural Engineer / Sustainability)