



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	ofi
Country	Türkiye
Crop	Hazelnut
Production process	Harvest
Assessment location	Türkiye, Samsun
Monitor	Asya Control Certifications & Consultancy
Assessment dates	September 5 and 7- 9, 2022
Number of assessed farms	15
Number of farmers interviewed	15
Total number of workers	219
Number of workers interviewed	86

Employment Relationship

Compliance Status

Section	Benchmark	Compliance status	Farms
Human Resource Management System	ER.1.1	Noncompliance	Farm 3,4,5,7,8,10,11,13,14,15
	ER.2.1 (PR)	Not initiated	All farms
	ER.2.1.1 (PR)	Not initiated	All farms
Recruitment and Hiring	ER.3.1	Noncompliance	Farm 2,4,5,6,7,8,13,15
	ER.3.1.1	Noncompliance	Farm 2,4,5,6,7,8,13,15
	ER.3.1.2	Noncompliance	Farm 2,4,5,6,7,8,13,15
	ER.4	Noncompliance	Farm 1,2,3,6,7,8,9,10,11,12,13,14,15
	ER.5.1	Noncompliance	Farm 1,2,3,6,7,10,15
	ER.5.2	Noncompliance	Farm 1,2,3,6,7,8,9,10,11,12,13,14,15
	ER.5.3	Not Applicable	
	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		
Terms and Conditions	ER.9.1	Risk of Noncompliance	Farm 1,2,3,4,5,6,7,8,9,14
	ER.9.2.1	Noncompliance	All farms
	ER.9.2.2	Not Applicable	
	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	All farms (except farm 5)
	ER.12.1	Noncompliance	All farms
	ER.12.1.1	Noncompliance	All farms
	ER.12.2	Not Applicable	All farms
	ER.13.1	Noncompliance	All farms
ER.13.2 (PR)	Not initiated	All farms	
ER.13.3 (PR)	Not initiated	All farms	
Administration	ER.15.1	In Compliance	
	ER.15.2	In Compliance	
	ER.15.2.1	Risk of Noncompliance	Farm 1,2,3,4,5,6,7,8,12
	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	Farm 7,9,10,11,12
	ER.18.2 (PR)	In progress	Farm 7,9,10,11,12
Right to Organize and Bargain	ER.19	Not Applicable	All farms
Work Rules and Discipline	ER.20.1	Not Applicable	All farms
	ER.20.2	Noncompliance	All farms
	ER.20.3 (PR)	Not initiated	All farms
	ER.20.4	Noncompliance	All farms

	ER.20.6	Noncompliance	All farms
	ER.20.7	Noncompliance	All farms
	ER.20.8	Noncompliance	All farms
	ER.20.9 (PR)	Not initiated	All farms
	ER.20.11	Noncompliance	All farms
Access to Training for Family Members	ER.21	Risk of Noncompliance	Farm 1,2,3,7,9,11,12,13,14,15
HSE Management System	ER.24.1.	Risk of Noncompliance	All farms
	ER.24.2 (PR)	In progress	All farms
	ER.24.3	Risk of 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 Company has been making considerable effort to get contracts signed between workers and farmers recently. As a result, the monitors came across contracted work in 5 gardens during the 2022 assessment. This is a good start for establishing habits and awareness.

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 farms 3,4,5,7,8, 10,11,13,14,15
Findings/Noncompliance Explanation	<p>Monitors reported that 5 (Farm 1,2,6,8,12) out of 15 interviewed farmers had signed a written agreement with workers. The Company strives to get workers and farmers to enter into contracts. This is a good start, but the Company needs to raise contract awareness.</p> <p>All other workers were verbally informed about tasks, working hours, and conditions without further details like payment intervals, wages, etc.</p> <p>The workers and farmers who signed an agreement had limited knowledge about the agreement they had signed. They do not know what it means to sign a contract and are unaware of the content.</p> <p>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, or cleaning the soil.</p>

	<p>Many interviewed workers, especially female workers, did not know what wage they would receive at the end of the harvest. The District Governorship of Terme has announced the working hours and the daily net minimum wage to be 216 TL. The farmers stated that they would pay the wages accordingly. One interviewed farmer was unsure how much he would pay and said that big farmers in some villages determine the daily wage in the region. Other farmers reported paying the seasonal migrant workers 216, 225, or 250TL/day. The farmer who hired a local working group will pay 300 TL/day this year.</p>
Company Action Plan	
Activity	<p>ofi farmer training for signing the seasonal agricultural work contract between farmers, workers, and labor contractors on job descriptions, contract signing, and the right and responsibilities of these stakeholders will be increased to reach more parties (especially the workers). New ofi farmers who just joined the sustainability farmer program will be subjected to training on work contracts before the next harvest season. In training given to the farmers, ofi will continue explaining the workers' rights and the content of the seasonal agricultural work contract to at least 2000 farmers. A blank copy of the agreement will be given to the farmers. ofi will also invite authorized staff from the Turkish Employment Agency (İŞKUR) to attend the training in the villages, using the FLA's in-state presence. Additional training on criminal liability will also be provided by İŞKUR staff.</p> <p>During harvest seasons, seasonal agricultural work contract trainings will also be provided by ofi to raise awareness on wages, contracts, rights, and responsibilities of workers and other stakeholders. In addition, the seasonal migrant worker trainings will be held in the provinces of origin during the winter period (for example, Sanliurfa, Diyarbakir, Mardin).</p> <p>ofi will also conduct trainings with farmers, labor contractors, and other intermediaries to create awareness of the need for contracts, minimum wage, working hours, working conditions, rights, and responsibilities. ofi will continue to provide one-on-one consultancy and training to labor contractors. The importance of seasonal agricultural work contracts will continue to be emphasized in the training content. Blank copies of the contract will also be given to these stakeholders.</p>
Output indicators (targeted results)	The number of trained farmers, workers, labor contractors, and intermediaries will be tracked. Awareness of the written contract will be achieved among all stakeholders.
Timeline and Deadline Date	For origin worker trainings: March 2023, and the rest of the trainings: September 2023.
Input (budget/resources)	ofi Personnel (e.g., Social Workers and agricultural engineer), İŞKUR staff
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations Coordinator)

Recruitment and Hiring	
Benchmarks	Compliance Status
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.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	Noncompliance in farms 2,4,5,6, 7,8,13,15

<p>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>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 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 as 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>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 the contract, temporary, casual, daily, seasonal, or migrant workers the same as for permanent workers;</p>	<p>In Farms 1,2,3,6,7,8,9, 10,11,12,13, 14,15</p> <p>In Farm 1,2,3,6,7,10,15</p> <p>In Farm 1,2,3,6, 7,8,9,10,11,12, 13,14,15</p> <p>In all farms</p>
<p>Findings/Noncompliance Explanation</p>	<p>Seven farmers (1,3,9,10,11,12,14) implemented age verification by checking workers' identities, whereas the remaining farmers did not verify the ages of workers during recruitment.</p> <p>Monitors reported that 12 of the seasonal migrant worker groups out of 14 (Farms 1,2,3,6,7,8,9,10,11,12,13,14) were working through a labor intermediary, and the farmer (farm 15) hiring local workers was working through a supervisor. The labor intermediaries reported deducting 10% from the daily earnings of the workers as their service fee (also known as labor contractor commission). In addition, the supervisor was reported to deduct 100 TL/day from workers' wages.</p> <p>The farmers pay the daily wage of workers to the labor intermediaries or the supervisor. They distribute the wages to workers after deducting their commission. Although the commission rate is generally 10%, during the worker interviews, it was obvious that workers did not know how much money they would receive at the end of the job. The monitors detected that workers at seven farms (farms 1,2,3,6,7,10,15) would receive below the minimum legal wage after deduction of the labor contractor or supervisor's commission; workers at one farm (farm 10) would receive 195 TL/day, workers at one farm (farm 15) would receive 200 TL/day and workers at five farms (farm 1,2,3,6,7) would receive 203 TL/day.</p> <p>At one farm (farm 15), one permanent worker was detected. The farmer reported that this worker received a minimum monthly wage for undertaking farming activities.</p>
<p>Company Action Plan</p>	
<p>Activity</p>	<p>ofi continues to provide good social practices trainings to farmers in the supply chain. One of the subjects included in the training module is young labor and child labor- where ofi explains the minimum age of a worker. ofi social workers will continue informing approximately 2000 farmers and 2500 workers about the legal and minimum working age, human rights, working conditions, nutrition, and health issues.</p> <p>ofi has prepared a 'Young Worker Registration Form, YWRF' for farmers and workers. The importance of the YWRF and the Farmers' Book, which capture the age and other details of the farmers, will be made available to all ofi sustainability farmers. During the farmer trainings, emphasis will be raised on the importance of filling the YWRF and ascertaining the age of workers (with proof of documents as age verifications). As mentioned, ofi social workers</p>

	<p>will continue to train the farmers and workers in their supply chain during harvest.</p> <p>ofi, in cooperation with the Turkish Employment Agency (İŞKUR), will continue to train and document labor contractors to prevent illegal employment and unfair wages or deductions. Details on the legal obligations of the seasonal agricultural work contract will also be explained in detail. In addition, workers' timetable books prepared by ofi social workers, including the wage delivery form, will be given to each seasonal agricultural worker, and the purpose and usage of the wage delivery form will be explained to foster adoption.</p> <p>ofi will participate in wage commission meetings in 2023. At the meeting, ofi will present its proposal to ensure workers are not paid below the minimum wage. In addition, discussions on wage commissions will also be addressed to ensure workers do not receive anything below the minimum wage.</p>
Output indicators (targeted results)	<p>To provide age control for workers by the farmers.</p> <p>To prevent workers from receiving wages below the minimum wage.</p>
Timeline and Deadline Date	September 2023.
Input (budget/resources)	ofi Personnel (e.g., Social Workers and agricultural engineer)
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations coordinator)

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.9.2.1: provisions of national laws; 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. 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>Noncompliance in all farms</p>
<p>ER.9.1: Workers should be made aware of the employment terms under which they are engaged. ER.9.3: 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.</p>	<p>Risk of Noncompliance in all farms</p>
Findings/Noncompliance Explanation	<p>Seasonal workers in all gardens are verbally informed about the working conditions for 15 minutes before starting the work. Farmers and workers reported that they discuss wages in seasonal worker groups only with their supervisors or labor intermediaries.</p> <p>Since the terms of employment are not based on a written contract in most farms, the farmers can terminate the workers' employment without paying their wages. Accordingly, the benchmark is identified as a risk of noncompliance. The interviewed farmers and workers reported that in such cases, the farmers would not penalize the worker, such as not paying wages.</p>

	<p>2 farmers reported such cases. They did not like the workers' performance and did not call them for work the next day, terminating their employment. The workers had been paid up to the date of termination.</p> <p>Monitors did not meet pregnant or disabled workers during the worker interviews and farm walkthroughs. However, there were young workers between the ages of 15-17 and child workers under 15. It has been observed that young or child workers work at the same time as adult workers and perform the same tasks (picking and collecting hazelnut) as adults.</p> <p>Monitors confirmed that the Company had organized worker and farmer trainings throughout the year. However, they reported that farmers newly in the FLA program (for less than two years) had lower awareness about labor rights.</p>
Company Action Plan	
Activity	<p>ofi will frequently conduct training to sensitize and raise awareness of workers on written contracts and wage transparency. Contract templates, Farmers Books, Workers' books, Labour Contractor Books, and Young Worker Registration Forms will be provided to these stakeholders.</p> <p>Information on age verification, the legal working age, the minimum wage, employment termination procedures, and job descriptions will be outlined in these documents (listed above). To improve working conditions for all parties, provide transparency, and ensure all applicable laws are followed.</p> <p>Moreover, the ofi pre-harvest, harvest time, and post-harvest worker-farmer trainings will also be expanded to reach more parties from 2023 with emphasis on seasonal agricultural work contract and registered employment, child-young labor, working conditions and worker rights, job description, health, and nutrition.</p>
Output indicators (targeted results)	Increasing farmers' knowledge about workers' rights (working conditions, working age, e.g.)
Timeline and Deadline Date	September 2023.
Input (budget/resources)	ofi Personnel (e.g., Social Workers and agricultural engineer)
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations Coordinator)

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).	Risk of Noncompliance in Farms 1 to 8 and 12
Findings/Noncompliance Explanation	<p>Workers at nine farms out of visited 15 (farms 1,2,3,4,5,6,7,8,12) had received an advance payment to cover some of the transportation costs. Workers reported they needed the advance payment as the transportation expenses had increased rapidly due to the currency and economic crisis that hit Türkiye in 2022. However, the workers and farmers are not keeping written records for the advance payments. Therefore, both sides are at risk in case of disagreement in the future.</p> <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 that</p>

	the employer paid would be deducted from their compensation as verbally agreed by both parties.
Company Action Plan	
Activity	<p>ofi social workers prepared a document on workers' advance requests and advance repayments. ofi, social workers advise seasonal migrant workers, labor contractors, and farmers that they should use an advance request form in cases where advances are used. In addition, ofi added advance request forms to the worker books ofi distributed to seasonal migrant workers during the 2022 crop year harvest. Workers usually receive advances before they come to harvest. The importance of keeping written documents of all forms of payments (including advance payments) will be re-echoed in all future training by ofi.</p> <p>ofi will continue to provide seasonal migrant workers with the Advance Request Forms.</p>
Output indicators (targeted results)	Raising awareness about payment and recruitment for workers, farmers, and labor contractors.
Timeline and Deadline Date	September 2023.
Input (budget/resources)	ofi Personnel (e.g., Social Workers and agricultural engineer)
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations Coordinator)

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 a regular conversation between workers and employer, suggestion boxes, workers' committees, designated spaces for worker meetings, and meetings between employer and workers' representatives. For small farms with informal labor structures, this means that the workers can openly reach and communicate with the producer/farmer.	Risk of Noncompliance in Farms 7,9,10, 11,12
Findings/Noncompliance Explanation	<p>Monitors understood that the seasonal migrant workers and farmers are mainly not in direct dialogue regarding working conditions. The farmer conveys the demands to the workers through the supervisor or labor contractor and vice versa. They only interact with the workers to understand when they would take a lunch break and how tired they are.</p> <p>This communication is more open and direct with the farmer in local worker groups.</p>
Company Action Plan	
Activity	<p>The language difference between migrant workers and farmers affects the communication between the farmer and the worker: Turkish is spoken by the farmers and Kurdish by the workers, and only a few speak both. Therefore, direct dialogue between farmers and workers is mainly hampered by this communication barrier. On the other hand, direct communication is frequently witnessed between local workers and farmers because both groups speak Turkish and are often neighbors or acquaintances of the farmers.</p> <p>ofi will receive support from workers to overcome this language barrier. With this translation support from one of the workers, ofi will discuss with the farmers and migrant workers the matters that affect workers, such as work contracts and working conditions.</p>

	<p>ofi will prepare posters in Turkish and Kurdish to overcome the language barrier. These posters will be displayed in the accommodation areas of the workers and at vantage places to highlight essential information like worker rights, minimum legal working age, minimum wage, and the like.</p> <p>ofi has employed a Kurdish-speaking social worker to remove the language barrier between seasonal migrant workers and farmers in 2022. The social worker previously worked as a seasonal migrant worker in the ofi supply chain. Later, she completed her academic education in social work and started working as a social worker at ofi. As a result, it will be ensured that the experiences about why the working conditions should be explained directly to the workers will be shared with the farmers.</p>
Output indicators (targeted results)	Overcoming the language barrier between workers and farmer; to enable seasonal migrant workers and farmers to have a direct dialogue on working conditions.
Timeline and Deadline Date	September 2023.
Input (budget/resources)	ofi Personnel (e.g., Social Workers and agricultural engineer)
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations Coordinator)

Work Rules and Discipline	
Benchmarks	Compliance Status
<p>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).</p> <p>ER.20.2: Any person supervising workers shall be aware of the disciplinary rules and practices.</p> <p>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.</p> <p>ER.20.6: Disciplinary rules and practices shall be clearly communicated to all workers.</p> <p>ER.20.7: Workers must be informed when a disciplinary procedure has been initiated against them.</p> <p>ER.20.8: Workers have the right to participate and be heard in any disciplinary procedure against them.</p> <p>ER.20.11: The disciplinary system shall include a third-party witness during imposition and an appeal process. In case of smallholder settings, the existing appeal mechanism at the community level is acceptable.</p>	<p>Noncompliance in all farms</p>
Findings/Noncompliance Explanation	<p>There is no written or verbally announced disciplinary rule. Instead, the farmer decides when something happens at that point, depending on the case and their expectations. For example, one of the widely applied disciplinary rules by the farmer is to terminate the employment of a worker (or worker group) if he/she is not satisfied with the performance. In such cases, interviewed farmers reported that they would pay wages up to date of termination.</p>
Company Action Plan	
Activity	<p>The farmer notebooks distributed by ofi to the farmers in their supply chain already contain disciplinary procedures, which are explained to them by ofi Social workers during farmer training.</p> <p>ofi social workers will explain this procedure to farmers in farmer trainings and warn farmers to inform migrant workers about this issue. ofi will also add the disciplinary procedure to the worker and labor contractor training modules at the origin. In addition, ofi social workers will ask the migrant workers whether they know the disciplinary rules during the harvest period and will inform them.</p> <p>Notice will be made if there are any exceptional conditions in the seasonal agricultural work contract. New clauses on working conditions and contract</p>

	termination terms may be inserted with the consent and knowledge of both parties.
Output indicators (targeted results)	To promote the use of the disciplinary rule procedure.
Timeline and Deadline Date	September 2023.
Input (budget/resources)	ofi Personnel (e.g., social workers and agricultural engineer)
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations Coordinator)

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.	Risk of Noncompliance in farms 1,2,3, 7, 9,11,12,13, 14,15
Findings/Noncompliance Explanation	The interviewed farmers and workers reported that their family members are invited for trainings. Workers' family members who are present at the workplace participate in trainings. However, the farmers' wives and children usually do not attend the trainings unless they are directly involved with farming activities and decision-making.
Company Action Plan	
Activity	ofi organized collective farmer trainings with the participation of family members of the farmers, especially their spouses. In these farmer trainings, a survey was conducted to analyze the root cause of why spouses did not participate before. According to the results of this survey, the reasons for not participating in the farmer trainings are that these trainings are held in the courtyards of mosques after the Friday prayer, in the areas belonging to the coffee house, which are the gathering areas for the men, and that the women are not aware of the farmer trainings. According to the survey results, farmer trainings will be organized so that spouses can participate in the new period, namely 2023. When the trainings is organized, information messages will be sent to the farmers, and their spouses and children will be asked to participate. To encourage the participation of women and children in trainings, support will be requested from manavs and village headmen. The day and time of the trainings will be printed as an announcement on a piece of paper and hung in places where women and children can see it, such as the village grocery store and bus stops. Thus, it will be ensured that women and children are informed about the trainings. Areas where women and children can participate, will be preferred as training places. (for example, town halls, village squares, school gardens, etc.)
Output indicators (targeted results)	Ensure that everyone involved in the production process (all family members) receives training.
Timeline and Deadline Date	September 2023.
Input (budget/resources)	ofi Personnel (e.g., social workers and agricultural engineer)
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations Coordinator)

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.	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	<p>Since the farms are small, no one is responsible for HSE issues.</p> <p>The Company delivers worker trainings, and HSE is discussed in these trainings. The farmers deliver similar but shorter trainings (around 15 minutes) on recruitment day. Farmers mainly make basic warnings about the job, such as "do not slip, do not fall," during these sessions. The interviewed workers do not recall much from these trainings, except simple things such as being aware of danger related to heights/falling, wild animals, or sunburn.</p>
Company Action Plan	
Activity	<p>The farmer is directly responsible for the HSE as the farms are small. For this reason, social workers in ofi explain the HSE rules in all farmer trainings. ofi social workers also constantly emphasize what farmers must communicate before workers enter the farm.</p> <p>Seasonal migrant workers (approx. 2500 workers) will be given refreshment trainings on HSE rules in origin trainings. Thus, workers will be ensured to reinforce the subjects they learned during the harvest period on HSE and increase their awareness.</p> <p>Detailed trainings on HSE will continue to be given to workers and farmers. HSE applications, explained theoretically in farmer and worker trainings, will be put into practice. And it will be supported by visual materials. For this, ofi will prepare new, impressive visual materials.</p> <p>Within the scope of HSE, ofi recommends workers wear rubber shoes to reduce the risk of slipping, especially on sloping lands. ofi also recommends wearing long-sleeved clothing and long socks covering their entire body to protect them from grass, thorns, and insects. ofi will add a long-sleeved t-shirt, socks, and rubber shoes to the PPE distributed to the workers per these recommendations.</p> <p>Posters visualizing HSE rules will be prepared to raise awareness of seasonal migrant workers. In addition, the posters will be hung in places where seasonal agricultural workers are located, thereby increasing the visibility of the posters.</p>
Output indicators (targeted results)	To raise awareness of workers on health, safety, and environmental rules against dangers in farms or living areas.
Timeline and Deadline Date	September 2023.
Input (budget/resources)	ofi Personnel (e.g., social workers and agricultural engineer)
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations Coordinator)

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.	Risks of Noncompliance in all farms

Findings/Noncompliance Explanation	<p>The Company has dedicated a phone hotline and website for suggestions and grievances. They delivered trainings and developed communication material for publicizing the hotline, but neither workers nor farmers knew there was a confidential grievance mechanism they could use.</p> <p>Farmers stated during interviews that they can convey their complaints and requests to the Company's agricultural engineers and social workers. On the other hand, workers reported that they could reach the supervisor, labor intermediary, the state's emergency phone lines, or the gendarmerie when they had a complaint.</p>
Company Action Plan	
Activity	<p>As mentioned in the findings, although ofi has dedicated a hotline and website for suggestions and grievances, provided trainings, and developed communication materials to publicize this helpline, workers and farmers are unaware there is a confidential grievance mechanism they can use. For this reason, to increase worker and farmer awareness this year, a suggestion and complaint hotline number will be printed on the (t-shirts, hats, etc.) and distributed to both workers and farmers. In addition, the hotline number will be posted where farmers and workers can see it.</p> <p>The farmer and worker trainings will give more detailed information about the hotline and grievance mechanism.</p>
Output indicators (targeted results)	Ensuring the effective use of all channels of the grievance mechanism.
Timeline and Deadline Date	September 2023.
Input (budget/resources)	ofi Personnel (e.g., social workers and agricultural engineer)
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations Coordinator)

Non-discrimination

Compliance Status

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

Health-Related Discrimination	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 all farms
Findings/Noncompliance Explanation	The farmers do not know any local laws, regulations, or judicial processes related to non-discrimination. Therefore, they cannot clearly define the concept of discrimination. Interviewed farmers said they would not discriminate against workers based on religion, language, or race, but no one mentioned age, gender, disability, or pregnancy.
Company Action Plan	
Activity	<p>ofi will hang posters with the headline "Discrimination" in the village squares. This poster states that discrimination is against the law and types of discrimination (language, religion, race, age, gender, disability, etc.). ofi will increase awareness by posting this poster in more places where farmers and workers can see it better.</p> <p>Discrimination and what includes discrimination will be emphasized in the trainings of farmers and workers. In addition, the issue of discrimination and its types will be added to the origin trainings as a module so that workers can better understand it.</p>
Output indicators (targeted results)	To make the concept of discrimination known in all aspects (language, religion, race, age, gender, disability, etc.).
Timeline and Deadline Date	September 2023.
Input (budget/resources)	ofi Personnel (e.g., social workers and agricultural engineer)
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations Coordinator)

Recruitment and Employment Practices	
Benchmarks:	Compliance Status
ND.2.1: Recruitment and employment practices shall be free from any type of discrimination. 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	<p>The farmers or labor contractors have no non-discrimination policy and limited knowledge or understanding of the concept. They only consider religion, language, or race as discrimination subjects.</p> <p>One farmer (farm 15) stated that he would never work with seasonal migrant workers who come from South Eastern Anatolian region. 1 farmer (farmer 8) specifically stated that he would not work with workers who are originating from Urfa region (one of the main cities of origin of seasonal migrant workers).</p>

	The Company delivers trainings to workers and farmers; non-discrimination is discussed, but neither the workers nor the farmers are fully aware of the subject.
Company Action Plan	
Activity	In addition to the activities written in ND.1, these two farmers will be given one-on-one training on discrimination.
Output indicators (targeted results)	Understanding discrimination and raising awareness
Timeline and Deadline Date	September 2023.
Input (budget/resources)	ofi Personnel (e.g., social workers and agricultural engineer)
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations Coordinator)

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	Seasonal workers and local workers are not paid equally. In addition, it has been observed that seasonal migrant workers were working longer hours (daily 9-10 hours) than local workers (8 hours). The minimum wage reported to be paid to seasonal migrant workers is 216 TL/day, whereas the interviewed local worker group is paid 300TL/day. Monitors noticed workers on 12 farms, where seasonal migrant worker groups are hired, were hired through labor intermediaries. The amount these workers would receive at the end of their job is calculated as 195 TL/day due to 10% deductions made by the labor contractors.
Company Action Plan	
Activity	ofi tells about the issue of paying at least the minimum wage determined by the Governorships to all agricultural workers, regardless of seasonal or local, in farmer trainings. However, ofi cannot interfere with the wage agreed between the workers and the farmers, except for the minimum wage. In farmer trainings, ofi will emphasize that all agricultural workers, regardless of local or seasonal, should be paid at least the minimum wage determined by the Governorships. ofi will suggest to public institutions and propose to add an article to the decisions of the wage determination commission such as "farmers must pay at least the minimum wage determined by the Governorships to workers local, seasonal or without any discrimination." As written in the activity written for the E.R.5.2; ofi will suggest that the minimum wage determined at the wage determination commission will be 10% higher so that workers do not fall below the minimum wage after the 10% cut.
Output indicators (targeted results)	Elimination of irregularity in working hours. Ensuring that the daily wages of workers are not lower than the minimum wage.

Timeline and Deadline Date	September 2023.
Input (budget/resources)	ofi Personnel (e.g., social workers and agricultural engineer)
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations Coordinator)

Marital or Pregnancy-Related Discrimination	
Benchmarks	Compliance Status
<p>ND.5.2: Employers shall not threaten female workers with dismissal or any other employment decision that negatively affects their employment status to prevent them from getting married or becoming pregnant.</p> <p>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.</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> <p>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.</p>	<p>Risk of Noncompliance in all farms</p>
<p>ND.5.1: Employers shall not require pregnancy testing of female workers except as required by legal health and safety provisions. 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>	
Findings/Noncompliance Explanation	<p>Monitors reported that most farmers in hazelnut are male and are not checking the pregnancy condition of the workers since it is not culturally appropriate, "they would be ashamed to ask it."</p> <p>Monitors did not meet any pregnant or nursing workers during garden assessments. However, farmers are unaware of the working conditions identified for pregnant or nursing workers by the law. Only two farmers said they would give these workers lighter work but did not comment about their working hours.</p>
Company Action Plan	
Activity	<p>ofi explains in detail the transactions to be made in the books given to the farmers. Awareness-raising activities will be continued for the action plan of the topics that are found to be inconsistent and for the prevention of risky ones.</p> <p>Male farmers will be informed about the health status of female workers, such as pregnancy and breastfeeding, through their spouses or daughters or the social workers of the workplace. Male farmers will inform their wives about working during pregnancy, and workers will be encouraged to carry out inspections (such as warnings for light work) for the worker's benefit in the light of information about their pregnancy status. In order not to be overlooked, a simple one-page form containing age, gender, pregnancy, breastfeeding, and general health status information will be prepared so that the information of the workers can be collected and tracked in a form, and forms will be left to the farmers to encourage follow-up of the samples before the workers enter the garden.</p> <p>ofi provides a worker's book to all employees, including a pregnancy and breastfeeding form. This is how the social workers of the ofi follow.</p>
Output indicators (targeted results)	To raise awareness about special situations (e.g., pregnancy) that may pose risks in working relationships.

Timeline and Deadline Date	September 2023.
Input (budget/resources)	ofi Personnel (e.g., social workers and agricultural engineer)
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations Coordinator)

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	
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, procedures, and penalties was low.
Company Action Plan	
Activity	ofi provides information on harassment in its trainings for migrant workers. Harassment and privacy training will be provided to farmers within the scope of the pilot study with the cooperation of ofi and UCIM (Saadet Teacher Combating Child Abuse Association). Within the scope of summer school projects, educational trainings will be provided for detecting and preventing child abuse and harassment, and visual materials will be provided for training.

Output indicators (targeted results)	To raise awareness of applicable regulations, procedures, and penalties.
Timeline and Deadline Date	September 2023.
Input (budget/resources)	ofi Personnel (e.g., social workers and agricultural engineer)
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations Coordinator)

Child Labor

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	CL.1	Noncompliance	Farm 8,13,15
Minimum Age	CL.2	Noncompliance	Farm 8,13,15
Immediate Family Members	CL.3	In Compliance	
Right to Education	CL.4.1 (PR)	In compliance	
Young Workers	CL.5	In Compliance	
	CL.6.1	Noncompliance	Farms 1 to 4.6, to 15
	CL.6.2	Noncompliance	Farms 1 to 4.6, to 15
	CL.7	Noncompliance	Farms 1 to 4.6, to 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	In Compliance	
	CL.10.2 (PR)	In progress	All farms

Child Labor Assessment Summary

Notable Good Practices (if any)

The Company carried out summer school projects for children of the seasonal migrant workers in two regions of Samsun in cooperation with the Directorate of the National Education and Public Education. The Company reported that the maximum number of participating students per day was 32.

The Company has provided science education kits to children at the summer schools by agreement with the Twin Science Company.

Teachers delivered activities to help children gain basic science knowledge and skills, think scientifically, solve problems, and have a positive attitude toward science.

The Company conducted worker trainings in Sanliurfa after the 2021 Harvest. This is one of the cities where most seasonal migrant workers reside. The Company trained both the labor contractors and workers accessed about worker rights.

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 8,13,15
Findings/Noncompliance Explanation	Monitors detected workers under 15 at three farms (farms 8,13,15). These workers were employed together with adult workers, and they

	<p>were reported to collect hazelnuts from the ground, pick from branches, and receive the same daily wage as adult workers.</p> <p>The farmers reported that a decision was taken at the Samsun Governor's meeting in the region that workers over 14 could work. Monitors reviewed the Samsun province Terme district decree about wages, and this was reading the minimum working age as 16, which is in line with the national law that considers the completed age of 15 as the minimum age for work.</p>
Company Action Plan	
Activity	<p>The farms found to be employing child labor belonged to farmers who entered the ofi's supply chain this year. For this reason, awareness about child labor has not developed enough. ofi does not tolerate child labor and hence provides training to farmers, workers, and agricultural labor contractors on eliminating child labor. In fact, just one day before the inspection, workers in a garden identified as employing child labor were visited by social workers and an FLA officer for training for an FLA shadow training. The farmers and workers were informed during the trainings that the children must not work. However, in the monitoring, it was determined that child labor was employed. ofi, immediately took action to remove the child from the farm. ofi re-educated farmers who were found to have children on the farm. ofi repeats training to farmers in the 2022 crop year.</p> <p>ofi has a Child Labor Monitoring and Remediation System (CLMRS) to specifically address child labor and improve child labor cases' detection, monitoring, and remediation. The system clearly defines the improvements to be made in eliminating child labor, the roles and responsibilities of employees, monitoring, and reporting. This system is a digital system. ofi social workers instantly collect and record data in the field via tablet or phone. This way, data is safely stored without delay and overlooked, and necessary actions are taken.</p> <p>On the other hand, the whole process is handled meticulously: For registered children, social workers immediately intervene on the scene and implement a remedial action plan within seven days. ofi registered the children detected in the farms during the system inspection. In addition, education kits were distributed to the determined children.</p> <p>ofi social workers will conduct unannounced internal audits of 10% of farmers. Thus, ofi will check the statements of farmers and workers. ofi will apply the current procedure for farms where child labor is detected. If it continues, ofi will remove the farmer from the farmer sustainability program. Three farms with child labor were added to this list.</p>
Output indicators (targeted results)	To prevent children from entering farms and to prepare activities for them to be in safe areas.
Timeline and Deadline Date	September 2023.
Input (budget/resources)	ofi Personnel (e.g., social workers and agricultural engineer)
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations Coordinator)

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 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 legislations but must work to progressively raise the minimum age to 15 years.

Noncompliance
in farms
8,13,15

Findings/Noncompliance Explanation

Monitors detected workers under 15 at three farms (farms 8,13,15). These were two boys of 13 and 14 and 3 girls of 12, 13, and 14 among the seasonal worker groups. In addition, the monitors interviewed some of the children (farms 8,13) while working at another farmer's orchard. The interviewed farmers (farms 8,13) had reported on whose orchard their workers were working on the day of assessment. One of these farmers (farm 13) stated that if the child's performance is sufficient, he or she can work.

At another farm (farm 15), a 13-year-old boy was seen while he was distributing water. The farmer was paying him a half day's wage for his work. On the other hand, a 14-year-old boy, physically more developed than the other, was paid a full wage as he collected hazelnuts from the ground.

Company Action Plan

Activity

ofi, sees child labor as one of its biggest and most fundamental problems. In this direction, informative trainings are given to the farmers in their supply chain by the social workers of **ofi**, and child labor is struggled by subjecting them to internal and external audits.

ofi has remediation plans in place in case of identification of a child labor case. The most important of these remediation projects are Summer School and Children on the Football Field projects. Children on the Football Field Project aims to break gender stereotypes and improve equality between girls and boys. This project creates an equal environment for boys and girls by teaching them football as a male-dominated sport and gives a message to children about gender equality. With these studies, safe areas are created for children detected during harvest, and children are prevented from going to the farm.

In 2022;

- **339** children participated in the summer school project.

- **84** children participated in the Children on the Football Field Projects.

Education kits are distributed for children who cannot be directed to summer school (such as those in regions where summer school is not open). **ofi** distributed training kits to **1160** children during the 2022 harvest period.

ofi opened only one summer school in the region where the audit was conducted, and children were detected on the farm. There was a summer school of another association in the same region. The summer school of this association was closed one week before the end of the harvest. For this reason, the children were detected on the farm during the audit. In this regard, the **ofi** held a meeting on FLA's 2023 tender criteria that the associations doing projects within the scope of eliminating child labor in the procurement areas of hazelnut companies should not carry out unannounced activities. **ofi** will increase the number of summer schools from 8 to 10 for the 2023 harvest period. In this way, **ofi** reaches more children. A meeting was requested from the FLA in May for all companies and associations to set common standards for summer schools.

ofi, will continue farmer training on child labor in the training of farmers, labor contractors, and seasonal migrant workers. **ofi** will repeat the trainings with farmers who use seasonal migrant workers as a result of the supply chain

	mapping it has done before the workers arrive to raise awareness on child labor.
Output indicators (targeted results)	To prevent children from entering farms and to prepare activities for them to be in safe
Timeline and Deadline Date	September 2023.
Input (budget/resources)	ofi Personnel (e.g., social workers and agricultural engineer)
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations Coordinator)

Young Workers	
Benchmarks	Compliance Status
<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 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, 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.</p>	<p>Noncompliance in all farms except farm 5</p>
Findings/Noncompliance Explanation	<p>The monitors saw young workers at 14 of the visited orchard (farm 5 is an exception). Farmers do not keep records of the young workers they employ. Labor contractors keep some records (about their employment dates, age in some cases) but these records do not include their assignments or overtime working hours.</p> <p>Farmers who employ young workers in their orchards do not know the working conditions of young workers. Young workers work the same working hours as adult workers. Their working hours range between 8 to 9,5 hours a day, without a weekly rest day unless it rains (workers are given an unpaid rest day if it is raining). For most farmers, 15 is the minimum employment age based on the decree of the District Governorhip of Terma. However, five farmers out of 15 stated that the minimum working age was 18.</p> <p>Young workers were not dealing with agrochemicals but working on steep slopes and bending branches.</p>
Company Action Plan	
Activity	<p>ofi trains farmers on an age verification system, working conditions for young workers and distributes farmer handbooks where they can record details of workers. Farmers inform ofi social workers during the harvest period when their workers arrive. Social workers go to workers for training. Then, since most farmers are 60 years or older, social workers fill out the forms for age verification, etc., on behalf of the farmers. "Young worker registration forms" are available for all inspected farmers.</p> <p>In the trainings, the necessity of filling these age verification forms as employers by the farmers as soon as the workers arrive will be emphasized. ofi will check through the social workers during their internal monitoring visits that the forms have been filled out. ofi will continue to explain in detail and with examples to farmers that young workers can work in light work. And ofi will continue to inform farmers that if young workers work in harmful conditions, they might have many psychological and physical problems.</p>

	<p>ofi will hang posters on child labor, minimum ages, youth labor, etc., in places where all farmers can see, especially in village squares in regions that have just entered the sustainability program.</p> <p>ofi will organize worker trainings in the origin cities of the seasonal migrant workers(for example, Diyarbakir, Sanliurfa, Mardin) to provide workers with detailed information on working conditions, minimum working ages, child labor, young worker, etc.</p>
Output indicators (targeted results)	Ensure that the necessary documents (Young worker registration form, registration of working days, e.g.) are filled, and records are kept.
Timeline and Deadline Date	September 2023.
Input (budget/resources)	ofi Personnel (e.g., social workers and agricultural engineer)
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations Coordinator)

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	
	HSE.4 (PR)	In compliance	All farms
Evacuation Requirements and Procedure	HSE.5.1 (PR)	Not initiated	All farms
	HSE.5.2	Risk of Noncompliance	All farms
Safety Equipment and First Aid	HSE.6.1 (PR)	In progress	Farm 1,6,7
	HSE.6.2 (PR)	In progress	All farms
	HSE.16.3 (PR)	In compliance	All farms
Personal Protective Equipment	HSE.7 (PR)	In progress	All farms
	HSE.8	In Compliance	
Chemical Management	HSE.9.1	In Compliance	
	HSE.9.2	In Compliance	
	HSE.9.2.1	In Compliance	
	HSE.10	Not Applicable	
	HSE.11.1	In Compliance	
	HSE.11.2	In Compliance	
Protection Reproductive Health	HSE.12.1	Risk of Noncompliance	All farms
	HSE.12.2 (PR)	In progress	All farms
Infrastructure	HSE.13 (PR)	Not Applicable	All farms
	HSE.17.1	Noncompliance	Farm 2,3
	HSE.17.2 (PR)	Not initiated	All farms
	HSE.19 (PR)	In progress	Farm 4,9,10,11,13,14
	HSE.21 (PR)	In progress	All farms
	HSE.22 (PR)	In progress	Farm 3,7,8
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

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 monitors verified that the Company had communicated general information regarding HSE issues to the workers. Those who attended the trainings were found to have basic knowledge about HSE issues.</p> <p>However, farmers do not verify if there are protected category workers (pregnant, nursing, any person with disabilities...) present among the workers in their gardens. The farmers have no or limited knowledge about the local regulations related to HSE issues and what conditions workers (especially protected workers) could work in. There are no HSE-related procedures at the farm level.</p>
Company Action Plan	
Activity	Farmers are informed about the procedures and working conditions in farmer trainings. The disciplinary and pregnant and breastfeeding procedures in the farmer's notebooks distributed to the farmers by the ofi contain the necessary information. For the farmers to grasp the contents of these procedures and make the necessary applications, detailed information on the subject will be given in the trainings. The procedures will continue to be delivered to the farmers. Within the scope of these trainings, more than 2000 will be reached.
Output indicators (targeted results)	To ensure that farmers know local regulations on HSE issues and the conditions under which workers (specially protected workers) can work
Timeline and Deadline Date	September 2023.
Input (budget/resources)	ofi Personnel (e.g., social workers and agricultural engineer)
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations Coordinator)

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>None of the farms have emergency or evacuation procedures. Farmers' and workers' awareness of evacuation and firefighting emergency cases is low.</p> <p>It is reported that there is no earthquake, flood, or landslide risk in the region. When it starts raining, workers stop working and return to their accommodations. Farmers informed monitors that it is not possible to have firefighting equipment in the gardens.</p>
Company Action Plan	

Activity	ofi will prepare emergency or evacuation procedures for farmers to use on their farms. However, emergency or evacuation procedures are new for workers and farmers. It will take time to gain awareness of this issue. ofi will hold meetings with the Disaster and Emergency Management Presidency (AFAD). ofi will be asked to AFAD to train farmers on emergency and evacuation procedures. In addition to the trainings, brochures on the subject will be requested, and cooperation meetings will be held. Awareness of farmers on emergency and evacuation procedures will be raised through trainings and collaborations.
Output indicators (targeted results)	Raising awareness on emergency and evacuation. Minimizing damages in case of danger.
Timeline and Deadline Date	September 2023.
Input (budget/resources)	ofi Personnel (e.g., social workers and agricultural engineer)
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations Coordinator)

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	Monitors reported that female workers do two types of work during the harvest. It is either cooking at accommodation points or harvesting in the gardens. Since they do not carry out agrochemical and chemical usage tasks, there is no risk associated with these issues. However, farmers do not verify if there are protected workers among the group members. Furthermore, farmers have no or limited knowledge about the local regulations related to HSE issues and the working conditions of protected workers (working hours, tasks they can undertake...).
Company Action	
Activity	ofi Sustainability Program has prepared a pregnant woman procedure to regulate working conditions to support the health and safety of pregnant/breastfeeding employees on the farms. This procedure covers all supply chain actors within the sustainability program's scope. The document is distributed to all farmers in the supply chain of ofi with a farmer notebook . ofi explains the topics in the document to the farmer.
Output indicators (targeted results)	Farmers will have information for all special-status workers. (pregnant, nursing, young, etc.)
Timeline and Deadline Date	September 2023.
Input (budget/resources)	ofi Personnel (e.g., social workers and agricultural engineer)
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations Coordinator)

Infrastructure

Benchmarks	Compliance Status
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HSE.17.1: Safe and clean potable water for drinking shall be freely available at all times, within a reasonable distance of the workplace. For farm settings in water-stressed regions where access to potable water is not always guaranteed, employers shall work with local authorities and other partners to provide clean water in sufficient volume and quality to guarantee the well-being of hired and family workers.		Noncompliance in farms 2, 3
Findings/Noncompliance Explanation	Workers at two farms (farms 2,3) reported that the drinking water at the orchards was yellow, but they had no health issues. The farmers stated that the drinking water was usually delivered to the region by the municipality using tanker trucks, but it has been a considerable time since the last delivery.	
Company Action Plan		
Activity	Seasonal migrant workers should be provided with drinking water by the farmers. Farmers should contact the Special Provincial Administration and the Municipality in case of problems in the supply of drinking water. ofi has determined that only these farmers have a problem, and ofi will be followed. With 2000 internal monitoring, the farmer will be asked about the clean water situation. If there is a problem, it will be directed to the municipality. The relevant farmer was directed and solved the problem.	
Output indicators (targeted results)	Clean drinking water will be provided to the workers by the farmers.	
Timeline and Deadline Date	September 2023.	
Input (budget/resources)	ofi Personnel (e.g., social workers and agricultural engineer)	
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations Coordinator)	

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	Overall, there is no emergency plan to access the medical facilities. There is no responsible person identified for potential healthcare cases. The farmer takes the ill person to the medical facilities in his vehicle. Calling an ambulance is another option.	
Company Action Plan		
Activity	Since the farms where seasonal migrant workers work are small, the farmer is responsible for health events. Therefore, farmers know the emergency numbers in case of great risk. In addition, there are emergency numbers in the books distributed by ofi . ofi will be posting emergency numbers at the places where seasonal migrant workers stay during the harvest season next year.	
Output indicators (targeted results)	Raising awareness of emergencies	
Timeline and Deadline Date	September 2023.	
Input (budget/resources)	ofi Personnel (e.g., social workers and agricultural engineer)	
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations Coordinator)	

Hours of Work

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HOW.1.1	Noncompliance	All farms
	HOW.1.2	Noncompliance	All farms (except farms 4,15)
	HOW.1.3	Noncompliance	All farms (except farms 4,15)
	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	Farms 1 to 4, 6 to 15
	HOW.4.2 (PR)	Not initiated	All farms
	HOW.4.3	Noncompliance	All farms
Overtime	HOW.5.1	Noncompliance	All farms
	HOW.5.2 (PR)	Not initiated	All farms
	HOW.6.1	Noncompliance	All farms
	HOW.6.2	Noncompliance	All farms
	HOW.6.3 (PR)	Not initiated	All farms
	HOW.7	Not Applicable	All farms
Public Holidays and Leave	HOW.8.1	Noncompliance	All farms
	HOW.8.2	Noncompliance	All farms
	HOW.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	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-day period; and (4) shall be fully compensated according to legal requirements or worker agreements, whichever is more favorable to workers.</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>Noncompliance in all farms All farms except farms 4, 15</p> <p>All farms except farm 4,15</p>
<p>Findings/Noncompliance Explanation</p> <p>In the Terme region, working hours are announced as 7:00-18:00 by the decree of the District Governor's office.</p> <p>Few farmers and workers know the national laws, regulations, and procedures concerning work hours, public holidays, and leave on assessed orchards.</p> <p>The monitors detected that working hours changed between 07:00 -18:00 for 13 migrant worker groups (farm 1,2,3,5,6,7,8,9,10,11,12,13,14) and</p>	

	<p>08:00-18:00 for one migrant worker group (farm 4) and one local worker group (farm 15). The total break times changed from 1,5 to 2 hours, which includes a 1-hour break for lunch in all orchards. After subtracting the break times, the daily working hours were found to be 9,5 hours for three migrant worker groups, 9 hours for ten migrant worker groups, and 8 hours for one local and one migrant worker groups. This makes weekly working hours range between 56 and 66,5 hours. The monitors observed that some of the workers and farmers were aware of regulations about working hours limited to 8 hours. However, the working hours in the gardens were generally above 8 hours.</p> <p>The workers reported working between 20 to 30 days without rest unless the weather is rainy. However, the workers are granted an unpaid rest day if the weather is rainy.</p>
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Company Action Plan

Activity	Information about the working hours of seasonal migrant workers is given to the farmers and workers by the social workers of ofi . However, although the farmers know the subject, they do not comply with the legal working hours because they want the hazelnuts to be collected as soon as possible. In this regard, the sanctions of public institutions are important. For this reason, ofi will hold meetings with the district governorships throughout the year and discuss the work that can be done to follow and implement the legal deadlines regarding working hours. ofi will inform 2500 seasonal migrant workers about the public institutions they should apply to regarding their working conditions. In addition, the trainings is to be held in the provinces of origin (Diyarbakir, Şanlıurfa). Therefore, the importance of the subject will be emphasized in the trainings given to the farmers. In addition, Turkish Employment Agency personnel will be invited to the training to inform the village headman and the leading farmers of the region about legal information about working conditions and the legal sanctions that will be applied if illegal conditions are determined by meeting with Turkish Employment Agency provincial directorates in the regions.
Output indicators (targeted results)	Improving working conditions and Ensuring the implementation of legal working hours
Timeline and Deadline Date	September 2023.
Input (budget/resources)	ofi Personnel (e.g., social workers and agricultural engineer)
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations Coordinator)

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>	<p>Noncompliance in all farms except farm 5</p> <p>All Farms</p>
Findings/Noncompliance Explanation	Monitors reported that the national law regarding daily working hours for pregnant and nursing as 7,5 hours and 8 hours for young workers were unmet. All these disadvantaged workers worked the same daily hours up to 9,5 hours as any other adult worker. There is no regulation implemented for

	protected workers. The monitors did not see any young workers at one orchard (farm 5) out of the 15 visited.
Company Action Plan	
Activity	Information on working conditions will continue to be given to seasonal migrant workers and farmers. Pregnant and nursing employee conditions and disciplinary procedures are included in the books given to the farmers. ofi distributes worker notebooks for each worker after the trainings. The notebooks contain information on working conditions, emergency numbers, registration forms for those who work in special cases (pregnant, breastfeeding, and disabled employees or children who stay at home without work), and a calendar to keep track of working days. Pregnant and nursing procedures and disciplinary procedures will be added to these books to give to migrant workers during the harvest. This notebook will be distributed to at least 2500 workers. In addition, these procedures and documents will be added to the files specified to be created for farmers.
Output indicators (targeted results)	Working conditions for young, pregnant, and nursing workers will be clear and protected.
Timeline and Deadline Date	September 2023.
Input (budget/resources)	ofi Personnel (e.g., social workers and agricultural engineer)
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations Coordinator)

Overtime	
Benchmarks	Compliance Status
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. HOW.5.2: Payment of overtime rates is unaffected by a calculation that spreads total hours over more than one week. 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. HOW.6.2: All overtime work shall be voluntary.	Noncompliance in all farms
Findings/Noncompliance Explanation	<p>The worker groups work more than 48 hours per week, between 56 and 66,5 hours. These workers are not paid for any overtime hours above the legal regular working hours. The farmers and workers verbally agree on the total number of work days against the agreed daily wage without calculating the premium for any overtime hour. There is no special agreement for overtime. The workers have to accept this deal to be able to work on the farm.</p> <p>There is no awareness of working and overtime hours among farmers and workers.</p> <p>Overtime is not voluntary but obligatory as part of regular work and not paid. The interviewed workers stated that the working hours are too long and exhausting. It should also be considered that they do not have weekly rest days unless it is raining, and that day is an unpaid break.</p>
Company Action Plan	
Activity	ofi explains the working hours in farmer and migrant worker trainings and the working standards of all employees in trainings. ofi has prepared posters regarding working hours. ofi social workers hang these posters in village

	<p>squares and workers' accommodation areas. The social workers will focus on this issue during the training to increase awareness.</p> <p>In January and February of 2023, ofi will provide detailed information on legal working hours and overtime to the workers in the trainings in the origin cities. In addition, the training and certification of labor contractors will continue. Labor contractors must establish working hours with farm owners before going to the harvest site. For this reason, ofi will also focus on working hours in labor contractors training. In addition, as stated in ER 7.6, programs will be carried out to determine the minimum wage to be 10% more than the minimum wage to be received by migrant workers. Authorized personnel from Turkish Employment Agency provincial directorates in the region will be invited to the labor contractors' training and certification to be carried out in the origin cities (Diyarbakir, Sanliurfa), and the importance of legal legislation will be emphasized in the trainings.</p>
Output indicators (targeted results)	Increasing awareness about overtime.
Timeline and Deadline Date	September 2023.
Input (budget/resources)	ofi Personnel (e.g., social workers and agricultural engineer)
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations Coordinator)

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 refused.</p> <p>HOW.14: Employers shall provide workers with sick leave as required under national laws, local provisions, regulations, and procedures.</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 on assessed farms. However, if a worker is ill, s/he can stay at an accommodation point to rest or is taken to the hospital, which is considered unpaid leave time.</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	As the Seasonal Agricultural Worker contract states, farmers and seasonal migrant workers agree on a daily wage. They do not have the right to take annual leave as they are daily temporary jobs. The farmer cannot follow this because he employs short-term employment. Labor contractor can follow. This topic will be added to the Labor contractors' trainings.
Output indicators (targeted results)	Expanding the training modules of labor contractor and improving their working conditions.
Timeline and Deadline Date	September 2023.
Input (budget/resources)	ofi Personnel (e.g., social workers and agricultural engineer)
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations Coordinator)

Compensation

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	C.1.1	Risk of Noncompliance	All farms
	C.1.2	Noncompliance	All farms
	C.1.3	Noncompliance	Farm 1,2,3,6,7,10,15
	C.1.4	Not initiated	All farms
Minimum Wage/Fair Compensation	C.2.1	Noncompliance	Farm 1,2,3,6,7,10,15
	C.2.2	Noncompliance	Farm 1,2,3,4,5,7,8,9,10,11,13,14
	C.2.3	In Compliance	
	C.2.4 (PR)	In progress	All farms
	C.2.5 (PR)	In compliance	
	C.2.6 (PR)	In progress	All farms
Farmer/Producer Income	C.3	Not Applicable	All farms
Wage Payment and Calculation	C.4 (PR)	In progress	All farms
	C.6	Risk of Noncompliance	All farms
	C.7.1	In Compliance	
	C.7.2	Noncompliance	All farms
	C.7.3 (PR)	In progress	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	All farms
	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)	In progress	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

General Compliance	
Benchmarks	Compliance Status
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.	Noncompliance in all farms
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	

<p>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>In farms 1,2,3,6,7,10,15</p>
<p>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.</p>	<p>Risk of Noncompliance in all farms</p>
<p>Findings/Noncompliance Explanation</p>	<p>Monitors did not detect any financial disciplinary measures. However, there are deductions in the wages of the seasonal migrant and local workers. The migrant workers are recruited through a labor contractor, and the local workers through a supervisor who deducts about 10% of the worker's wages as an intermediary commission. This deduction is a prerequisite for finding a job on the farms since the labor contractor reached an agreement with the farmer a couple of months before the harvest, organizing the trip to the region and arranging accommodations. Both farmers and workers know the deduction.</p> <p>These worker groups do not know how much they will receive at the end of the job due to the unknown amount to be deducted by the labor contractor. The labor contractor or supervisors can abuse this situation. Therefore, seasonal workers are at risk of being paid below the minimum daily wage.</p> <p>The fee for 1 group of local workers (farm 15) was agreed to be 300 TL. However, the interviews showed that the supervisor paid workers 200 TL/day and kept the remaining 100 TL/day as his commission.</p> <p>The seasonal migrant worker groups and the farmers at six farms (farms 5,8,9,12,13,14) reported that farmers would pay the worker's wages to the labor contractors as 250 TL/day, and on six farms (farms 1,2,3,4,6,7), the wage would be paid to the labor contractor as 225 TL/day. One farmer (farm 10) reported he would pay the workers' wage as 216 TL/day to the labor contractor, whereas one farmer (farm 11) said he did not decide yet what wage he would pay workers while workers were already working on his orchard. Based on the calculations;</p> <ul style="list-style-type: none"> • workers whose farmers would pay the labor contractor 250 TL/day would receive 225 TL/day, • workers of farmers paying 225 TL/day would receive 203 TL/day and, • workers whose farmer would pay the labor contractor 216 TL/day would receive 195 TL/day. <p>195 TL/day and 203 TL/day are below the legal minimum wage.</p>
<p>Company Action Plan</p>	
<p>Activity</p>	<p>ofi provides trainings to both farmers and labor contractors throughout the year. In these trainings, ofi emphasizes that it is forbidden for the labor contractor to deduct a commission from the workers and that the labor contractor must receive the brokerage fee from the farmer. And throughout the year, ofi's social workers constantly remind this in their consultations.</p> <p>As the farmers that were determined noncompliant are new farmers of ofi, social workers will cover their farms in 2023. ofi will concentrate throughout the year on raising awareness of farmers in new regions entering the supply chain. In addition, as stated in ER 7.1, programs will be carried out to determine the minimum wage during the harvest season. Furthermore, as stated in HOW 5.1, officials from Turkish Employment Agency provincial</p>

	directorates will be invited to the training of labor contractors in the provinces of origin.
Output indicators (targeted results)	Preventing workers from receiving wages below the daily minimum wage
Timeline and Deadline Date	September 2023.
Input (budget/resources)	ofi Personnel (e.g., social workers and agricultural engineer)
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations Coordinator)

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.	Noncompliance in farms 1,2,3,6,7,10,15 In farms 1,2,3,4,5,7,8, 9,10,11,13,14
C.2.2: Employers shall provide all legally required benefits to all workers.	
Findings/Noncompliance Explanation	<p>The local commission announced the daily legal minimum wage as 190 TL for agricultural workers. This is less than 216 TL/day, the national minimum wage announced by the Ministry of Labor and Social Security and applied in most Blacksea Coast. However, in all assessed farms, the assessors reported that farmers agreed to pay at least 216 TL (225 TL/day and 250 TL/day are other rates in the visited farms) to the seasonal migrant workers and 300 TL/day to the seasonal local workers.</p> <p>The labor contractors deduct 10% from the seasonal migrant worker's wages which brings the seasonal migrant worker groups wages at six farms (farms 1,2,3,6,7 10) to 195 TL/day and 203 TL/day as less than the legal minimum fee after the deduction of the labor intermediary's commission and the local worker group would receive to 200 TL/day after deduction of supervisors' commission.</p> <p>Farmers pay the labor contractors, so the farmers do not follow how much is paid to the workers afterward. As a result, there were groups of workers who did not know how much they would receive.</p> <p>The farmer (farm 15) with the seasonal local worker group was paying the supervisor 800 TL/day for him to transport the workers with the minibus to and from the orchards. 2 farmers (farms 6,12) who employed seasonal migrant workers reported they paid 2500 TL (farm 6) and 6000 TL (farms 12) as a contribution to workers' travel costs from their hometowns. 4 farmers (farm 9,10,13,14) employing migrant workers reported they will not pay workers any travel costs. The remaining eight farmers (farms 1,2,3,4,5,7,8,11) employing migrant workers had no idea whether they would pay any travel costs.</p>
Company Action Plan	
Activity	The main reason workers' wages fall below the minimum wage is the deductions of labor contractors. ofi's target group is therefore labor contractors and farmers. ofi , informs workers, labor contractors, and farmers when minimum wages are determined. In this regard, programs will be carried out to take the actions specified in ER 7.6.

	ofi distributes worker notebooks to seasonal migrant workers. There is a delivery report of the fee in this book. ofi social workers will carry out information work so that the worker, farmer, and labor contractors sign these minutes. In addition, as stated in HOW 5.1, work will be carried out to address this issue in the trainings, where Turkish Employment Agency personnel will inform the labor contractors. Information activities regarding the minimum wage that can be paid will also be carried out within this scope.
Output indicators (targeted results)	Preventing workers from receiving wages below the daily minimum wage
Timeline and Deadline Date	September 2023.
Input (budget/resources)	ofi Personnel (e.g., social workers and agricultural engineer)
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations Coordinator)

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.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> <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
<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>	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	<p>During interviews, the farmers and workers reported that they pay all wages upon completion of the harvest task at their farms. Supervisors and labor contractors pay their worker groups when the entire seasonal work is completed. The total harvest period is about 20 to 30 days. The workers confirmed that they prefer to receive their wages in bulk at the end of work as this is a way to keep it safe and avoid making expenses before going home.</p> <p>The farmers pay all wages in cash except for one farm (farm 5). This farmer will make payments through bank transfer. The workers verified during interviews that they prefer payments in cash. Workers report they receive their wages through labor contractors as they have no other alternative, and they rely on them.</p> <p>There is no overtime payment. The farmer, labor contractors, and supervisor agree on one standard wage for total daily work hours without considering overtime.</p>
Company Action Plan	
Activity	The seasonal agricultural work contract includes articles about wages and travel allowance. In addition, whatever is agreed between the worker, farmer, and labor contractor can be added to the special conditions section of the contract. For this reason, a seasonal agricultural work contract is very

	important. ofi will also make it more common for workers and farmers in the supply chain to sign this contract.
Output indicators (targeted results)	Dissemination of the contract: To raise awareness about working conditions and wages (For the farmers, workers, and labor contractors).
Timeline and Deadline Date	September 2023.
Input (budget/resources)	ofi Personnel (e.g., social workers and agricultural engineer)
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations Coordinator)

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,	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	The workers showed awareness during interviews about the legal minimum wage for hazelnut harvest. They all knew that the Governorship determines the wages but not all workers were informed about the exact wage they would receive before commencing work. In addition, both migrant and local worker groups were not communicated regarding the payment scheme and the compensation calculation details at the start of the harvest.
Company Action Plan	
Activity	In addition to their explanations about working conditions, social workers of ofi also provide supportive reminders for titles such as brochures, vinyl, banners, etc. ofi provides detailed information on the training of agricultural business intermediaries, and the daily wage is written in the agricultural business contracts promoted by the ofi . ofi will prepare 60 posters in the supply areas containing information about the current base price, wage information, wage delivery minutes, and contracts and will hang them in various places and places to attract the attention of farmers and workers. It will keep the information up to date throughout the harvest years. In addition, the current wage before the harvest will be sent to the workers via message.
Output indicators (targeted results)	Increasing awareness of wages and working conditions
Timeline and Deadline Date	September 2023.
Input (budget/resources)	ofi Personnel (e.g., social workers and agricultural engineer)
Responsible staff (title/department)	Şafak Özgün AKYILDIZ (Sustainability Operations Coordinator)