



Independent External Monitoring Agriculture Report, 2023

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	Sabirlar
Country	Türkiye
Crop	Hazelnut
Production process	Harvest
Assessment location	Ünye, Ordu, Türkiye
Monitor	CSR and Sustainability Services Pty Ltd
Assessment dates	August 28-30, 2023
Number of assessed farms	15
Total area covered	84.6 ha
Number of farmers interviewed	15
Total number of workers	174
Number of workers interviewed	102

Employment Relationship

Compliance Status

Section	Benchmark	Compliance status	Farms
Human Resource Management System	ER.1.1	Noncompliance	1,2,3,4,5,6,8,10,11,12,13,14,15
	ER.2.1 (PR)	In progress	1,2,3,4,5,6,8,10,11,12,13,14,15
	ER.2.1.1 (PR)	In progress	1,2,3,4,5,6,8,10,11,12,13,14,15
Recruitment and Hiring	ER.3.1	Noncompliance	1,5,6,11,12,13,14,15
	ER.3.1.1	Noncompliance	1,5,6,11,12,13,14,15
	ER.3.1.2	Noncompliance	1,5,6,11,12,13,14,15
	ER.4	Risk of Noncompliance	1,4,6,7,11
	ER.5.1	Risk of Noncompliance	1,4,6,7,11
	ER.5.2	Risk of Noncompliance	1,4,6,7,11
	ER.5.3	In Compliance	
	ER.6 (PR)	In progress	All farms
	ER.7.1	In Compliance	
	ER.7.2	In Compliance	
	ER.7.3	In Compliance	
	ER.7.4	In Compliance	
	ER.7.5	In Compliance	
	ER.7.6	Noncompliance	All farms
	ER.7.7	Not Applicable	
ER.7.8	Not Applicable		
Terms and Conditions	ER.9.1	Noncompliance	5,9,13
	ER.9.2.1	Risk of Noncompliance	All farms
	ER.9.2.2	Not Applicable	
	ER.9.2.3	Risk of Noncompliance	All farms
	ER.9.3.1	In Compliance	
	ER.9.3.2	In Compliance	
	ER.9.3.3	In Compliance	
	ER.10	Not Applicable	
	ER.11	Noncompliance	All farms
	ER.12.1	Risk of Noncompliance	All farms
	ER.12.1.1	Risk of Noncompliance	All farms
	ER.12.2	Not Applicable	
	ER.13.1	Not Applicable	
	ER.13.2 (PR)	In progress	All farms
ER.13.3 (PR)	In progress	All farms	
Administration	ER.15.1	In Compliance	
	ER.15.2	In Compliance	
	ER.15.2.1	Risk of Noncompliance	All farms
	ER.16.1	In Compliance	
	ER.16.2	In Compliance	
	ER.17.2 (PR)	Not initiated	All farms
	ER.17.3 (PR)	Not initiated	All farms
	ER.17.4 (PR)	Not Applicable	
Worker Involvement	ER.18.1	In Compliance	All farms
	ER.18.2 (PR)	In progress	All farms
Right to Organize and Bargain	ER.19	Not Applicable	
Work Rules and Discipline	ER.20.1	Noncompliance	All farms
	ER.20.2	Noncompliance	All farms

	ER.20.3 (PR)	Not initiated	All farms
	ER.20.4	Noncompliance	All farms
	ER.20.6	Noncompliance	All farms
	ER.20.7	Noncompliance	All farms
	ER.20.8	Noncompliance	All farms
	ER.20.9 (PR)	Not initiated	All farms
	ER.20.11	Noncompliance	All farms
Access to Training for Family Members	ER.21	Risk of Noncompliance	1,3,5,8,9,12,13,14,15
HSE Management System	ER.24.1.	Risk of Noncompliance	All farm
	ER.24.2 (PR)	In compliance	
	ER.24.3	In Compliance	
	ER.24.4.1 (PR)	In progress	All farm
	ER.24.4.2 (PR)	In progress	All farm
	ER.24.4.3 (PR)	In progress	All farm
	ER.24.4.4 (PR)	In progress	All farm
	ER.24.4.5 (PR)	In progress	All farm
	ER.24.4.6 (PR)	In progress	All farm
Grievance Procedures	ER.24.5 (PR)	In progress	All farm
	ER.25.1 (PR)	Not initiated	All farms
	ER.25.2 (PR)	Not initiated	All farms
	ER.25.3	In compliance	
	ER.25.4	Risk of Noncompliance	1,2,4

Employment Relationship Assessment Summary

Notable Good Practices (if any)

Sabirlar also conducted worker training in workers' cities of origin in 2023. They cooperated with two other FLA-affiliated companies (ofi and Yavuz) in 2022, accessing more than 1000 workers in Sanliurfa. These trainings aim to raise awareness on decent working conditions among workers in a more effective way. Experience showed that harvest awareness-raising trainings often comes too late as the workers are already in the harvest region and have agreed to work with the labor contractor by that point. Furthermore, workers are physically and mentally more open during the trainings conducted during the off-season, in their own cities, without the presence of farmers. They feel more comfortable providing feedback on their working and living conditions and sharing their experiences.

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 1,2,3,4,5,6,8,10,11,12,13,14,15
Findings/Noncompliance Explanation	The assessors verified that the farmers had signed agreements with workers at two farms (farms 7 and 9). The terms and conditions of employment, job description, and compensation were mentioned in these written agreements. However, the other farmers only had verbal agreements with workers. Workers at every visited farm knew the working hours and daily wages except on three farms (farms 5,9 and 13). Farmer no 1 stated that he had not signed an agreement yet with workers but was planning to do so. <u>Source:</u> Documentation, interviews & observation

Company Action Plan

Activity	<p>Brochures will be prepared for workers and farmers. It will be distributed to workers in February and farmers throughout the year. The brochure will address employment conditions such as working hours, contract work, and wages.</p> <p>The number of written agreements between farmers, workers, and labor contractors will increase. At least 30 contracts will be signed in August, the harvest time.</p> <p>Training will be given to workers, farmers, and labor contractors regarding contract work. Training will be given to 1000 workers in Şanlıurfa province in January and at least 500 workers in Ordu, Giresun, in August. This training will be given to 200 farmers and 25 labor contractors.</p>
Output indicators (targeted results)	<p>The number of written contracts will increase.</p> <p>Awareness will be created among farmers and workers.</p>
Timeline and Deadline Date	2024 August
Input (budget/resources)	One full-time social worker, one temporary social worker training costs, and the cost of the brochure
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager)

Recruitment and Hiring	
Benchmarks	Compliance Status
<p>ER.3.1: Employers shall verify proof of age documentation for all young workers on the farm at the time of their employment and work towards collecting and maintaining all documentation necessary to confirm and verify the date of birth of all workers, including long-term and casual workers.</p> <p>ER.3.1.1: Employers shall take reasonable measures to ensure such documentation is complete and accurate.</p> <p>ER.3.1.2: In those cases where proof of age documentation is not readily available or unreliable, employers shall take all necessary precautions that can reasonably be expected of them to ensure that all workers are at least the minimum legal working age, including requesting and maintaining medical or religious records of workers, or through other means considered reliable in the local context.</p>	<p>Noncompliance in farms 1,5,6,11, 12,13,14,15</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>Noncompliance in all farms</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 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>Risk of Noncompliance in farms 1,4,6,7,11</p>
Findings/Noncompliance Explanation	<p>The IDs of the seasonal migrant workers are, as per legal requirements, collected by the head of the village (muhtar), the farmer himself, or the staff of the Company and delivered to the gendarme for security check purposes. The farmers base the age verification upon this ID control. Still, this practice is solely for security purposes, and the farmers check the IDs themselves for proof of age documentation. The age verification or ID check is less common for local workers.</p> <p>A wage deduction is implemented at farms where workers are recruited through a labor contractor in the name of a recruitment commission or fee. Assessors noted the presence of agricultural labor contractors and a practice of deduction for their commission at five farms (1,4,6,7 and 11).</p> <p>The Turkish government declared this year's minimum legal wage as 447,15 TL/day. This year, due to labor shortages in the region and increased transportation costs, daily wages were noted to be above the minimum legal wage. The minimum daily</p>

	<p>wage paid was 550 TL. The labor contractors at farms 1,4,6,7 and 11 still deducted a 10% commission from workers' daily wages. Despite this deduction, the wages received by workers as 500 TL/day were above the minimum legal wage of 447,15 TL/day. This covers a risk where the farmer would pay the legal minimum wage to labor contractors; the labor contractors would pay less than the legal minimum wage.</p> <p>The interviewees reported that farmers did not pay advance or transportation payments but increased their daily wages.</p> <p>Assessors noted that two workers were working as permanent workers at one farm. The farmer reported that this was due to the farm size, which is 20 hectares, and they need regular labor throughout the year. These permanent workers are locals living in the same area and are retired. Although they work throughout the year, they still receive a daily wage. However, the daily wages of these permanent workers were 600 TL/day, way higher than the minimum wage.</p> <p><u>Source:</u> Documentation, interviews & observation</p>
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Company Action Plan

Activity	<p>Training on age verification with ID will continue to be provided to farmers. Identity verification will also be encouraged for local workers. Age verification training will be provided to at least 200 farmers in Giresun and Ordu. Farmers will be encouraged to fill out the worker registration form when their workers arrive. Record-keeping training related to this will also be added to the training content.</p> <p>Even though labor contractors make a 10% wage deduction, workers do not stay below the determined minimum wage. On the other hand, training will be provided to labor contractors to prevent labor contractors from making a 10% deduction. Twenty-five labor contractors will be trained on this subject.</p>
Output indicators (targeted results)	Awareness will be raised among farmers and labor contractors.
Timeline and Deadline Date	2024 August
Input (budget/resources)	One full-time social worker and one temporary social worker training costs
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager)

Terms and Conditions	
Benchmarks	Compliance Status
ER.9.1: Workers should be made aware of the employment terms under which they are engaged.	Noncompliance in farms 5,9,13
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.12.1: Employers shall regularly inform workers about workplace rules, health and safety information, and laws regarding workers' rights concerning 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.	Risk of Noncompliance in all farms
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.	Noncompliance in all farms

<p>Findings/Noncompliance Explanation</p>	<p>On all farms, workers were noted to be aware of the working hours and wages, except for three farms (5,9 and 13), where workers were not aware of daily wages.</p> <p>All farmers generally had basic knowledge about legal requirements for disadvantaged groups. However, monitors detected young workers working on four farms (5,11,14, and 15) working the same hours as adult workers.</p> <p>Working hours are one hour longer than the legal requirements at farms 1,2,3,6 and 10. These worker groups had 2-hour breaks, whereas all others worked between 08.00-18:00.</p> <p>Farmers at farms 1,2,3,4,5 had an awareness of workplace rules and labor standards. They knew about working hours, health and safety, child labor, and nondiscrimination. However, farmers did not provide information about harassment and abuse in the workplace and that these kinds of acts are subject to disciplinary measures. These awareness-raising activities were conducted by the Company and targeted farmers and workers.</p> <p>Farmers, labor contractors, and supervisors have limited knowledge of local labor law and the FLA Code. For example, farmers and supervisors knew about the legal minimum age for labor. However, they didn't know the legal limit for working hours for young workers.</p> <p>Assessors noted that there were less number of young workers compared to previous years. It should be noted that farmers with no young workers in their gardens reported that only part of the worker group was working in their gardens on the day of the assessors' visit, and the remaining workers were working for some other farmers.</p> <p>The assessors observed posters named "The rules to be followed in agricultural areas" at farms and villages. These posters had information regarding the disposal of pesticides, the environment, emergency numbers, social policies, legal working age, discrimination/harassment, freedom of movement, forced labor, compensation, and social rights of the workers. The posters provided general information about the rules to be applied at workplaces.</p> <p><u>Source:</u> Documentation, interviews & observation</p>
<p>Company Action Plan</p>	
<p>Activity</p>	<p>Workers and farmers will be notified of procedures and principles regarding working hours, leaves, and rest periods.</p> <p>Brochures containing light work and working conditions for young workers, working and break hours for workers, and FLA codes will be distributed to all workers, farmers, and agricultural intermediaries.</p> <p>Training will be given to workers, farmers, and labor contractors. Training will be given to 1000 workers in Şanlıurfa province in January and at least 500 workers in Ordu, Giresun, in August. This training will be given to 200 farmers and 25 labor contractors.</p>
<p>Output indicators (targeted results)</p>	<p>Awareness will be raised among farmers, workers, and labor contractors.</p>
<p>Timeline and Deadline Date</p>	<p>2024 August</p>
<p>Input (budget/resources)</p>	<p>One full-time social worker, one temporary social worker's training costs, and cost of the brochure</p>
<p>Responsible staff (title/department)</p>	<p>Emine ANKARALI (sustainability and social compliance manager)</p>

Administration	
Benchmarks	Compliance Status
ER.15.2.1: Advances must be appropriately 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 all farms
Findings/Noncompliance Explanation	<p>Workers usually receive their wages at the end of the harvest job. If the worker needs or requests any payment in advance, the amount that the employer pays will be deducted from their compensation as both parties verbally agree.</p> <p>Advance payments are not adequately documented; each side keeps its own track of the payment. The fact that this payment cannot be proven with a written document poses a risk for the worker and the farmer. Therefore, both sides are at risk in case of disagreement in the future.</p> <p><u>Source:</u> Documentation, interviews & observation</p>
Company Action Plan	
Activity	When farmers pay advances to workers, a signed form is used to verify this. Advance payment forms will be added to all farmer handbooks and distributed to all farmers. In this direction, 25 labor contractors, 1000 workers, and 200 farmers will be given training until August 2024.
Output indicators (targeted results)	Awareness will be created among farmers and workers.
Timeline and Deadline Date	2024 August
Input (budget/resources)	One full-time social worker and one temporary social worker training costs
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager)

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 know 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 the case of smallholder settings, the existing appeal mechanism at the community level is acceptable.</p>	Noncompliance in all farms
Findings/Noncompliance Explanation	<p>There are no clear disciplinary rules or practices at farms. Written policies and procedures are absent in this context, and a verbal agreement with clear rules between the farmers, labor contractors, and workers does not exist. The farmer and the labor contractor are leading in determining which disciplinary action will apply and in what circumstances.</p> <p><u>Source:</u> Documentation, interviews & observation</p>
Company Action Plan	
Activity	In August, disciplinary rules training will be given to at least 500 workers in Ordu, Giresun. This training will be given to 200 farmers and 25 labor contractors.

Output indicators (targeted results)	Awareness will be created among farmers and workers.
Timeline and Deadline Date	2024 August
Input (budget/resources)	One full-time social worker and one temporary social worker training costs
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager)

Access to Training for Family Members	
Benchmarks	Compliance Status
ER.21: Family members (spouses and adult children) involved directly or indirectly in agriculture production shall have access to all training and awareness-raising activities conducted for the workers and growers on the farms.	Risk of Noncompliance in farms 1,3,5,8,9, 12,13,14,15
Findings/Noncompliance Explanation	<p>Farmers 2,4,6,7,10,11 stated that their family members participate in training and awareness-raising activities.</p> <p>Seasonal migrant and local workers participate in the training in groups. Their family members are invited too. It is up to them to participate, which is not the case for their family members, who stay home and are not involved in hazelnut harvest work.</p> <p><u>Source:</u> Interviews & observation</p>
Company Action Plan	
Activity	<p>All family members participate in social training. All family members will be invited to agricultural training sessions during home visits. Women will also be invited to agricultural training.</p> <p>Since farmers and their family members participate in this social training throughout the year, it is left to the family members' discretion to participate in the training again during harvest time.</p>
Output indicators (targeted results)	All families will be encouraged to participate in the training.
Timeline and Deadline Date	2024 August
Input (budget/resources)	Three full-time agricultural engineers and one full-time social worker, one temporary social worker training costs
Responsible staff (title/department)	<p>Emine ANKARALI (sustainability and social compliance manager)</p> <p>Bünyamin SİVRİ (agricultural engineer)</p> <p>Hüsrev AKKAYA (agricultural engineer)</p> <p>Hayrullah KADİM (agricultural engineer)</p>

HSE Management System	
Benchmarks	Compliance Status

ER.24.1: Health, safety, and environmental rules shall be communicated to all workers in the local language or language spoken by workers if different from the local language.		Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	<p>HSE rules are communicated to workers by the affiliated company staff. On farms 1 and 2, the monitors confirmed that the communication was carried out to workers by the employees of the affiliated Company. Farmers communicate simple general issues of working conditions to workers before starting work. However, it was observed that this was not an explanation of HSE subjects but simple warnings such as "do not slip, do not fall."</p> <p><u>Source</u>: Interviews & observation</p>	
Company Action Plan		
Activity	<p>The HSE training module will be updated. HSE training will be made more comprehensive. Brochures containing HSE and FLA codes will be distributed to all workers, farmers, and agricultural intermediaries.</p> <p>Training will be given to workers, farmers, and labor contractors. Training will be given to 1000 workers in Şanlıurfa province in January and at least 500 workers in Ordu, Giresun, in August. This training will be given to 200 farmers and 25 labor contractors.</p>	
Output indicators (targeted results)	Awareness will be created among farmers and workers	
Timeline and Deadline Date	2024 August	
Input (budget/resources)	Three full-time agricultural engineers and one full-time social worker, one temporary social worker training costs and cost of the brochures	
Responsible staff (title/department)	<p>Emine ANKARALI (sustainability and social compliance manager)</p> <p>Bünyamin SİVRİ (agricultural engineer)</p> <p>Hüsrev AKKAYA (agricultural engineer)</p> <p>Hayrullah KADİM (agricultural engineer)</p>	

Grievance Procedures		
Benchmarks	Compliance Status	
ER.25.4: The Company shall create awareness of this communication and noncompliance reporting mechanism to its service providers and suppliers.	Risk of Noncompliance in farms 1,2,4	
Findings/Noncompliance Explanation	<p>The Company has created various grievance channels; one can use their hotline, the phone numbers of related employees, email, and messages through websites to reach them. During the farm visits, it was observed that the Company had created limited awareness about its grievance mechanism, especially about the hotline and numbers of employees. The workers of farms 1,2 and 4 stated that they knew nothing about the hotline. The farmers reported that they can contact the company staff for any requirement or request.</p> <p><u>Source</u>: Documentation, interviews & observation</p>	
Company Action Plan		
Activity	There is a complaint mechanism, and complaint methods have been defined. It is also explained to farmers throughout the year and workers during harvest. Since	

	<p>the training continued gradually during harvest, some groups were not visited during the audit.</p> <p>Training will be given to workers, farmers, and labor contractors. Training will be given to 1000 workers in Şanlıurfa province in January and at least 500 workers in Ordu, Giresun, in August. This training will be given to 200 farmers and 25 labor contractors.</p>
Output indicators (targeted results)	Awareness will be created among farmers and workers.
Timeline and Deadline Date	2024 August
Input (budget/resources)	Three full-time agricultural engineers and one full-time social worker, one temporary social worker's training costs
Responsible staff (title/department)	<p>Emine ANKARALI (sustainability and social compliance manager)</p> <p>Bünyamin SİVRİ (agricultural engineer)</p> <p>Hüsrev AKKAYA (agricultural engineer)</p> <p>Hayrullah KADİM (agricultural engineer)</p>

Nondiscrimination

Compliance Status

Section	Benchmark	Noncompliance	All 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	1,2,3,4,6,7,8,9,10,11
Discrimination in Training and Communication	ND. 4	Risk of Noncompliance	All farms
Marital or Pregnancy-Related Discrimination	ND.5.1	In Compliance	
	ND.5.2	In Compliance	
	ND.5.3	In Compliance	
	ND.6.1	Risk of Noncompliance	All farms
	ND.6.1.1	Risk of Noncompliance	All farms
Health-Related Discrimination	ND. 7	In Compliance	
	ND.8	Not Applicable	
	ND. 9	In Compliance	
Respect for Culture and Religion	ND.11	In Compliance	

Nondiscrimination Assessment Summary

General Compliance	
Benchmarks	Compliance Status

ND.1: Employers shall comply with all national laws, regulations, and procedures concerning nondiscrimination.		Noncompliance in all farms
Findings/Noncompliance Explanation	<p>Assessors noted that during interviews, farmers showed that they did not know the legal requirements regarding nondiscrimination. However, they have a general idea and sensitivity to nondiscrimination.</p> <p>Farmers reported that they preferably work with local workers as they are more satisfied with their performance; they believe that local workers know the details of the work. In contrast, they cannot communicate easily with migrant workers and are less satisfied with their work even though they cannot base their assessments on concrete evidence.</p> <p><u>Source:</u> Documentation, interviews & observation</p>	
Company Action Plan		
Activity	<p>Brochures will be prepared for workers and farmers. It will be distributed to workers in February and farmers throughout the year. The brochure will address nondiscrimination.</p> <p>Training will be given to workers, farmers, and labor contractors. Training will be given to 1000 workers in Şanlıurfa province in January and at least 500 workers in Ordu, Giresun, in August. These trainings will be given to at least 200 farmers and 25 labor contractor.</p>	
Output indicators (targeted results)	Awareness will be increased among farmers.	
Timeline and Deadline Date	2024 September	
Input (budget/resources)	One full-time social worker, one temporary social worker's training costs, and cost of the brochure	
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager)	

Recruitment and Employment Practices		
Benchmarks:	Compliance Status	
ND.2.1: Recruitment and employment practices shall be free from discrimination. ND.2.3: If not provided by law, employers must protect workers who allege any type of discrimination in recruitment and employment practices.	Noncompliance in all farms	
Findings/Noncompliance Explanation	<p>None of the visited farmers or interviewed labor contractors have a nondiscrimination policy. They are familiar with the concept of nondiscrimination in general. There is no communication or briefing to workers about nondiscrimination policies or regulations.</p> <p>The farmer on farm 2 stated that he would never work with workers from Urfa. The farmer on farm 13 had a similar attitude towards non-Turkish workers ("They do not know what is halal [right] or haram [wrong]. You never know when they will harm whom or what.").</p> <p><u>Source:</u> Interviews & observation</p>	
Company Action Plan		
Activity	<p>Laws and regulations regarding the principle of discrimination are explained to farmers. There are procedures regarding discrimination. The discrimination procedure will also be added to the farmer handbook. Additionally, farmer WhatsApp groups will provide information on these issues throughout the year.</p>	

	<p>Brochures will be prepared for workers and farmers. It will be distributed to workers in February and farmers throughout the year. The brochure will address nondiscrimination.</p> <p>Training will be given to workers, farmers, and labor contractors. Training will be given to 1000 workers in Şanlıurfa province in January and at least 500 workers in Ordu, Giresun, in August. These trainings will be given to at least 200 farmers and 25 labor contractor.</p>
Output indicators (targeted results)	Awareness will be increased among farmers.
Timeline and Deadline Date	2024 September
Input (budget/resources)	One full-time social worker, one temporary social worker's training costs, and cost of the brochure
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager)

Compensation Discrimination	
Benchmarks	Compliance Status
<p>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.</p>	<p>Noncompliance in farms 1,2,3,4,6, 7,8,9,10,11</p>
<p>Findings/Noncompliance Explanation</p> <p>The monitors detected discrimination practices in terms of compensation. The farmers reported that seasonal migrant workers were paid between 500 and 550 TL/day, whereas local groups were paid 600 to 700 TL. Migrant workers' transportation costs from their home town are not covered. When a farmer wants to cover this, they cover just one way, whereas all the local workers' transportation fees are covered. As an explanation, it is stated that the local workers are paid for a short distance, whereas seasonal migrants travel a long distance from Southeast or East Türkiye to the Black Sea coast.</p> <p>Assessors verified through interviews with farmers, labor contractors, and workers that seasonal workers work 1 hour longer than local workers.</p> <p>At farm 8, seasonal migrant and local workers were noted to work at the same farm simultaneously. Seasonal workers received 550 TL/day, while local workers received 700 TL/day for the same harvest work and hours. A migrant worker said, "We are foreigners, not locals, so we cannot understand this situation."</p> <p><u>Source:</u> Interviews & observation</p>	
Company Action Plan	
<p>Activity</p>	<p>All training, legal provisions, and laws regarding discrimination will be explained in more detail.</p> <p>To prevent the wage gap between workers, the commission's decision will be announced to farmers, and training will be provided to increase awareness of the issue.</p>
Output indicators (targeted results)	Awareness will be increased among farmers.
Timeline and Deadline Date	2024 September

Input (budget/resources)	One full-time social worker and one temporary social worker's training costs
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager)

Discrimination in Training and Communication	
Benchmarks	Compliance Status
ND.4: Employers shall guarantee that all workers have equal access to training and capacity building and no discrimination occurs based on the characteristics noted above, nor on literacy or location of the workers. Training and communication should be given in the native language accessible to workers.	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	There is no intentional exclusion from the training or communication for any workers. On the other hand, due to the language of the training and communications, which is Turkish, workers have difficulties understanding training or reading awareness-raising materials. Also, illiterate workers could face difficulties in getting the written message. There are Kurdish and Arabic-speaking workers among the worker groups, to whom the trainings are translated by their family members or relatives. <u>Source:</u> Documentation, interviews & observation
Company Action Plan	
Activity	While conducting the trainings, it will be ensured that at least one person (preferably the labor contractor) speaks Kurdish or Arabic. Before the training, workers will be asked if they want a translation, and training will be provided according to their language preferences.
Output indicators (targeted results)	Awareness will be increased among workers.
Timeline and Deadline Date	2024 August
Input (budget/resources)	One full-time social worker and one temporary social worker training costs
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager)

Marital or Pregnancy-Related Discrimination	
Benchmarks	Compliance Status
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 breast-feeding breaks and facilities. ND.6.1.1: Where such legal protective provisions are lacking, employers shall take reasonable measures to ensure the safety and health of pregnant women and their unborn children.	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	The Company and farmers do not verify if pregnant workers are among the groups. The farmers do not know the legal requirements for employing pregnant workers. <u>Source:</u> Documentation, interviews & observation
Company Action Plan	
Activity	A section in the worker registration form allows understanding of whether there is a pregnant or disabled worker. Farmers will be encouraged to use this form when

	<p>their workers arrive. All farmers will be given record-keeping training on this subject.</p> <p>Brochures will be prepared for workers and farmers. It will be distributed to workers in February and farmers throughout the year. The brochure will address pregnant workers working conditions.</p> <p>Training will be given to workers, farmers, and labor contractors. Training will be given to 1000 workers in Şanlıurfa province in January and at least 500 workers in Ordu, Giresun, in August. These trainings will be given to at least 200 farmers and 25 labor contractor.</p>
Output indicators (targeted results)	Awareness will be increased among workers.
Timeline and Deadline Date	2024 August
Input (budget/resources)	One full-time social worker, one temporary social worker training costs, and the cost of the brochure
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager)

Harassment or Abuse

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	H/A.1.1	Risk of Noncompliance	All farms
	H/A.1.2	In Compliance	
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	Not Applicable	
	H/A.10.1	Not Applicable	
	H/A.10.2	Not Applicable	

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 about the applicable regulations and penalties among farmers, labor contractors, and workers was low. <u>Source:</u> Documentation, interviews & observation
Company Action Plan	
Activity	Farmers and workers will be informed of legal regulations and penalties for discrimination and harassment. Training modules will be updated. Training will be given to workers, farmers, and labor contractors. Training will be given to 1000 workers in Şanlıurfa province in January and at least 500 workers in Ordu, Giresun, in August. These trainings will be given to at least 200 farmers and 25 labor contractor.
Output indicators (targeted results)	Awareness will be increased among farmers and workers.
Timeline and Deadline Date	2024 August
Input (budget/resources)	One full-time social worker and one temporary social worker training costs
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager)

Forced Labor

Compliance Status - In Compliance

Section	Benchmark	Compliance status	Farms
General Compliance	F.1	In compliance	
Freedom in Employment and Movement	F.2	In compliance	
	F.3	In compliance	
	F.4.1	In compliance	
	F.4.2	In compliance	
	F.5.3	In compliance	
	F.7.1	In compliance	
	F.7.2	In compliance	
	F.7.3	In compliance	
	F.7.4	In compliance	
	F.7.5	In compliance	
	F.7.6	In compliance	
	F.7.7	In compliance	
	F.8	In compliance	
Work of Family Members	F.6.1	In compliance	
	F.6.2	In compliance	

	F.6.3	In compliance	
	F.6.4	In compliance	
Personal Workers Identification and Other Documents	F.9	In compliance	

Child Labor

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	CL.1	Noncompliance	11, 15
Minimum Age	CL.2	Noncompliance	11, 15
Immediate Family Members	CL.3	Noncompliance	11, 15
Right to Education	CL.4.1 (PR)	In compliance	
Young Workers	CL.5	In Compliance	
	CL.6.1	Noncompliance	5, 11, 14, 15
	CL.6.2	Noncompliance	5, 11, 14, 15
	CL.7	Noncompliance	5, 11, 14, 15
Apprenticeships and Vocational Training	CL.8.1 (PR)	Not Applicable	
	CL.8.2 (PR)	Not Applicable	
Children on Premises	CL.9	In Compliance	
Removal and Rehabilitation of Child Laborers	CL.10.1	In Compliance	
	CL.10.2 (PR)	In progress	All farms

Child Labor Assessment Summary

Notable Good Practices (if any)

The Company collaborated with stakeholders to create safe spaces for children of workers' families during the 2023 harvest. They have carried out a joint project with the Ministry of National Education, where they renovated an unused building of a village school. The monitors visited the school and interviewed teachers and children of seasonal agricultural workers. It was seen that safe space created an opportunity for children to develop different skills.

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 11, 15
Findings/Noncompliance Explanation Monitors detected workers under the legal working age of 15, working during harvest as harvest workers among a seasonal migrant and a local worker group at two farms (farms 11 and 15). The boy at farm 11 was 14 years old and was a member of a seasonal migrant workers group, and the boy at farm 15 was 12 years old and was a member of a local workers group. They were collecting hazelnuts the same way as adult workers, working the same hours and receiving the same wage as adults. <u>Source:</u> Documentation, interviews & observation	
Company Action Plan	

<p>Activity</p>	<p>As soon as the child was seen during the audit, information was received from the auditors, and action was taken immediately. The children were removed from the farm and directed to a safe space. This year, cooperation was made with stakeholders to create safe spaces for the children of workers' families. A joint project with the Ministry of National Education renovated an unused village school building. Educational activities for children were carried out here, and a safe area was created for them. A summer school project was conducted where children could develop many different skills.</p> <p>Farmers, workers, and labor contractors receive continuous yearly training to prevent child labor. Training will be given to workers, farmers, and labor contractors. Training will be given to 1000 workers in Şanlıurfa province in January and at least 500 workers in Ordu, Giresun, in August. These trainings will be given to at least 200 farmers and 25 labor contractor.</p> <p>Brochures will be prepared for workers and farmers. It will be distributed to workers in February and farmers throughout the year. The brochure will address child labor.</p> <p>An internal control mechanism will be developed to establish the case management system and ensure the protection of children. The child labor case management system will be established by participating in external training. Through this internal management system to be established, places at risk of child labor will be identified, and the actions taken will be followed with forms created through this system. With these forms, improvements to be made in the fight against child labor, roles and responsibilities, and monitoring methods will be explained, and a case management system will be created based on these. Whether or not child labor is employed will be determined in advance through internal audits, a risk assessment will be made, and action will be taken accordingly.</p> <p>A summer school will be opened in the region to prevent child labor. A joint project will be developed with public institutions and local governments to remove children from the farm. With summer school being opened in the region, children will be kept away from the farms and provided with a safe space to receive education and have fun.</p>
<p>Output indicators (targeted results)</p>	<p>Awareness will be created among farmers and workers.</p> <p>An internal monitoring system for child labor will be established.</p> <p>A summer school project will be held for children.</p>
<p>Timeline and Deadline Date</p>	<p>2024 August</p>
<p>Input (budget/resources)</p>	<p>Three full-time agricultural engineers and one full-time social worker, one temporary social worker's training costs, cost of the brochure, and summer school costs</p>
<p>Responsible staff (title/department)</p>	<p>Emine ANKARALI (sustainability and social compliance manager) Bünyamin SİVRİ (agricultural engineer) Hüsrev AKKAYA (agricultural engineer) Hayrullah KADİM (agricultural engineer)</p>

<p>Minimum Age</p>	
<p>Benchmarks</p>	<p>Compliance Status</p>
<p>CL.2: Employers shall comply with ILO Convention 138 and shall not employ anyone under the age of 15 or the age for completion of compulsory education, whichever is higher. If a country has a specified minimum age of 14 years due to insufficiently developed economy and educational facilities, employers might follow national legislations but must work to raise the minimum age to 15 years progressively.</p>	<p>Noncompliance in farms 11, 15</p>

Findings/Noncompliance Explanation	<p>Monitors interviewed farmers and workers. When farmers were asked about the legal minimum working age, varying answers were received between 16 and 18. However, two child labor cases were detected at two farms. The farmers reported that the reason for child labor cases was the poor economic situation of these families and the fact that these workers arrived together with their families in the region.</p> <p><u>Source:</u> Documentation, interviews & observation</p>
Company Action Plan	
Activity	<p>As soon as the child was seen during the audit, information was received from the auditors, and action was taken immediately. The children were removed from the farm and directed to a safe space. This year, cooperation was made with stakeholders to create safe spaces for the children of workers' families. A joint project with the Ministry of National Education renovated an unused village school building. Educational activities for children were carried out here, and a safe area was created for them. A summer school project was conducted where children could develop many different skills.</p> <p>Farmers, workers, and labor contractors receive continuous yearly training to prevent child labor. Training will be given to workers, farmers, and labor contractors. Training will be given to 1000 workers in Şanlıurfa province in January and at least 500 workers in Ordu, Giresun, in August. These trainings will be given to at least 200 farmers and 25 labor contractor.</p> <p>Brochures will be prepared for workers and farmers. It will be distributed to workers in February and farmers throughout the year. The brochure will address child labor.</p> <p>An internal control mechanism will be developed to establish the case management system and ensure the protection of children. The child labor case management system will be established by participating in external training. Through this internal management system to be established, places at risk of child labor will be identified, and the actions taken will be followed with forms created through this system. With these forms, improvements to be made in the fight against child labor, roles and responsibilities, and monitoring methods will be explained, and a case management system will be created based on these. Whether or not child labor is employed will be determined in advance through internal audits, a risk assessment will be made, and action will be taken accordingly.</p> <p>A summer school will be opened in the region to prevent child labor. A joint project will be developed with public institutions and local governments to remove children from the farm. With summer school being opened in the region, children will be kept away from the farms and provided with a safe space to receive education and have fun.</p>
Output indicators (targeted results)	<p>Awareness will be created among farmers and workers.</p> <p>An internal monitoring system for child labor will be established.</p> <p>A summer school project will be held for children.</p>
Timeline and Deadline Date	2024 August
Input (budget/resources)	Three full-time agricultural engineers and one full-time social worker, one temporary social worker's training costs, cost of the brochure, and summer school costs
Responsible staff (title/department)	<p>Emine ANKARALI (sustainability and social compliance manager)</p> <p>Bünyamin SİVRİ (agricultural engineer)</p>

	Hüsrev AKKAYA (agricultural engineer) Hayrullah KADİM (agricultural engineer)
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Immediate Family Members

Benchmarks	Compliance Status
<p>CL.3: In accordance with national laws and ILO Convention 138, children of producers not younger than 12 years may be involved in light work on their parents' farm provided that:</p> <ul style="list-style-type: none"> • The work is not dangerous and not harmful to their health or development; • The work does not prejudice their attendance at school and is done within reasonable time limits after school or during holidays; • The work is appropriate to the child's age and physical condition and does not jeopardize the child's social, moral, or physical development; • The child's parents provide supervision and guidance. 	Noncompliance in farms 11, 15

Findings/Noncompliance Explanation	<p>When the verifiers interviewed the child laborers and other workers in the group, the answer was that these workers collect hazelnuts from the ground. This could be considered in the light work category. However, the workers at farms 11 and 15 were paid labor, whereas a boy on farm 14 was helping his family.</p> <p><u>Source:</u> Documentation, interviews & observation</p>
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Company Action Plan

Activity	<p>As soon as the child was seen during the audit, information was received from the auditors, and action was taken immediately. The children were removed from the farm and directed to a safe space. This year, cooperation was made with stakeholders to create safe spaces for the children of workers' families. A joint project with the Ministry of National Education renovated an unused village school building. Educational activities for children were carried out here, and a safe area was created for them. A summer school project was conducted where children could develop many different skills.</p> <p>Farmers, workers, and labor contractors receive continuous yearly training to prevent child labor. Training will be given to workers, farmers, and labor contractors. Training will be given to 1000 workers in Şanlıurfa province in January and at least 500 workers in Ordu, Giresun, in August. These trainings will be given to at least 200 farmers and 25 labor contractor.</p> <p>Brochures will be prepared for workers and farmers. It will be distributed to workers in February and farmers throughout the year. The brochure will address child labor.</p> <p>An internal control mechanism will be developed to establish the case management system and ensure the protection of children. The child labor case management system will be established by participating in external training. Through this internal management system to be established, places at risk of child labor will be identified, and the actions taken will be followed with forms created through this system. With these forms, improvements to be made in the fight against child labor, roles and responsibilities, and monitoring methods will be explained, and a case management system will be created based on these. Whether or not child labor is employed will be determined in advance through internal audits, a risk assessment will be made, and action will be taken accordingly.</p> <p>A summer school will be opened in the region to prevent child labor. A joint project will be developed with public institutions and local governments to remove children from the farm. With summer school being opened in the region, children will be kept away from the farms and will be provided with a safe space where they can both receive education and have fun.</p>
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Output indicators (targeted results)	<p>Awareness will be created among farmers and workers.</p> <p>An internal monitoring system for child labor will be established.</p>
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	A summer school project will be held for children.
Timeline and Deadline Date	2024 August
Input (budget/resources)	Three full-time agricultural engineers and one full-time social worker, one temporary social worker's training costs, cost of the brochure, and summer school costs
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager) Bünyamin SİVRİ (agricultural engineer) Hüsrev AKKAYA (agricultural engineer) Hayrullah KADİM (agricultural engineer)

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 a description of their assignment.</p> <p>CL.7: No person under 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 18. Such work includes but is not limited to applying agricultural chemicals, pesticides, and fertilizers, using farm equipment tools and machinery, lifting or moving heavy materials or goods, or carrying out hazardous tasks such as underground, underwater, or at dangerous heights. An adult must supervise every activity performed by a young worker.</p>	Noncompliance in farms 5, 11, 14, 15
Findings/Noncompliance Explanation	<p>The country's laws allow young workers who have completed the age of 15 and not completed the age of 18 to perform light work and work a maximum of 8 hours per day and 40 hours per week with no overtime or hazardous work.</p> <p>The monitors verified that farmers do not know the concept of young workers and the legal requirements. Farmers and labor contractors are not taking measures to ensure young workers are not working more than 8 hours a day and 40 hours a week and ensure that the workers do not perform hazardous work such as picking from branches, bending trees, or working on steep slopes. Verifiers noted that these workers work in the same conditions as adult workers.</p> <p><u>Source:</u> Documentation, interviews & observation</p>
Company Action Plan	
Activity	<p>Farmers and workers will be explained in more detail about who the young worker is, working hours, light/heavy work, and occupational health and safety issues. Training will be given to workers, farmers, and labor contractors. Training will be given to 1000 workers in Şanlıurfa province in January and at least 500 workers in Ordu, Giresun, in August. These trainings will be given to at least 200 farmers and 25 labor contractor.</p> <p>A brochure will be prepared for farmers and workers. The working conditions of young workers will be discussed in detail in this brochure.</p>
Output indicators (targeted results)	Awareness will be created among farmers and workers.
Timeline and Deadline Date	2024 August
Input (budget/resources)	Three full-time agricultural engineers and one full-time social worker, one temporary social worker training costs and cost of the brochure

Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager) Bünyamin SİVRİ (agricultural engineer) Hüsrev AKKAYA (agricultural engineer) Hayrullah KADİM (agricultural engineer)
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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 progress	All farms
Evacuation Requirements and Procedure	HSE.5.1 (PR)	Not initiated	
	HSE.5.2	Risk of Noncompliance	All farms
Safety Equipment and First Aid	HSE.6.1 (PR)	In progress	All farms
	HSE.6.2 (PR)	Not initiated	All farms
	HSE.16.3 (PR)	In progress	All farms
Personal Protective Equipment	HSE.7 (PR)	In progress	All farms
	HSE.8	In Compliance	
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	
Protection Reproductive Health	HSE.11.2	In Compliance	
	HSE.12.1	In Compliance	
Infrastructure	HSE.12.2 (PR)	Not Applicable	
	HSE.13 (PR)	Not Applicable	
	HSE.17.1	In Compliance	
	HSE.17.2 (PR)	In progress	All farms
	HSE.19 (PR)	In progress	All farms
	HSE.21 (PR)	In progress	All farms
Machinery Safety	HSE.22 (PR)	In progress	All farms
	HSE.14.1	In Compliance	
	HSE.14.2	In Compliance	
	HSE.14.3	In Compliance	
Ergonomics and Medical Facilities	HSE.14.4	In Compliance	
	HSE.15.2 (PR)	In progress	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 Company communicated general information to the farmers, and farmers were found to have basic knowledge about health and safety issues. However, they do not verify if there is a pregnant, ill worker, or any person with disabilities. The farmers do not know the legal requirements, and there is no procedure related to health and safety issues on the farm level.</p> <p><u>Source:</u> Documentation, interviews & observation</p>
Company Action Plan	
Activity	<p>There is an occupational health and safety procedure. Health and safety issues were also mentioned in the procedure. In addition, worker registration forms are used to determine whether there are young, ill workers or pregnant workers.</p> <p>Training will be given to 1000 workers in Şanlıurfa province in January and at least 500 workers in Ordu, Giresun, in August. These trainings will be given to at least 200 farmers and 25 labor contractor.</p>
Output indicators (targeted results)	Awareness will be created among farmers and workers.
Timeline and Deadline Date	2024 August
Input (budget/resources)	Three full-time agricultural engineers and one full-time social worker, one temporary social worker training costs and cost of the brochure
Responsible staff (title/department)	<p>Emine ANKARALI (sustainability and social compliance manager)</p> <p>Bünyamin SİVRİ (agricultural engineer)</p> <p>Hüsrev AKKAYA (agricultural engineer)</p> <p>Hayrullah KADİM (agricultural engineer)</p>

Evacuation Requirements and Procedure	
Benchmarks	Compliance Status
HSE.5.2: Where appropriate, workers shall be trained in evacuation procedures at least once per year.	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	<p>None of the farms have emergency or evacuation procedures.</p> <p>The area is reported as not having any earthquake risk. The farmers express that it is not possible to have firefighting equipment on all of the farms. Significant risks reported in the area are floods and landslides. The farmers apply simple measures for these cases, such as when the rain starts, the workers stop working and return to their accommodations.</p> <p><u>Source:</u> Documentation, interviews & observation</p>
Company Action Plan	
Activity	<p>Flood and landslide issues are included in occupational health and safety training.</p> <p>Training will be given to 1000 workers in Şanlıurfa province in January and at least 500 workers in Ordu, Giresun, in August. These trainings will be given to at least 200 farmers and 25 labor contractor.</p> <p>Brochures will be prepared for workers and farmers. It will be distributed to workers in February and farmers throughout the year. The brochure will address floods and landslides.</p>

Output indicators (targeted results)	Awareness will be created among farmers and workers.
Timeline and Deadline Date	2024 August
Input (budget/resources)	Three full-time agricultural engineers and one full-time social worker, one temporary social worker training costs and cost of the brochure
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager) Bünyamin SİVRİ (agricultural engineer) Hüsrev AKKAYA (agricultural engineer) Hayrullah KADİM (agricultural engineer)

Ergonomics and Medical Facilities	
Benchmarks	Compliance Status
HSE.16.2: Medical facilities shall be established and maintained as applicable laws require. In case of no local law, the employer shall ensure that the workers can utilize local service providers in case of medical emergencies and have the local medical officer's contact address available. In the case of a medical emergency, e.g., injury or sudden illness, growers will not unreasonably delay allowing a worker access to medical treatment.	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	No person was identified as responsible for any health incident. When asked, it is assumed that the farmer would take the ill person to the medical facilities by vehicle. Besides, no proper emergency plan or procedure is available to access the medical facilities. <u>Source:</u> Documentation, interviews & observation
Company Action Plan	
Activity	Farmers and workers will be informed of the numbers they can reach in an emergency. These numbers will also be announced via brochures. In addition, the Company's grievance number, which can be reached in case of emergency, will be added to the brochures.
Output indicators (targeted results)	Awareness will be created among farmers and workers.
Timeline and Deadline Date	2024 August
Input (budget/resources)	Three full-time agricultural engineers and one full-time social worker, one temporary social worker training costs and cost of the brochure
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager) Bünyamin SİVRİ (agricultural engineer) Hüsrev AKKAYA (agricultural engineer) Hayrullah KADİM (agricultural engineer)

Hours of Work

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HOW.1.1	Noncompliance	All farms
	HOW.1.2	Noncompliance	All farms
	HOW.1.3	Noncompliance	All farms
	HOW.1.4	In Compliance	
Rest Day	HOW.2	In Compliance	
Meal and Rest Breaks	HOW.3	In Compliance	
Protected Workers	HOW.4.1	Noncompliance	5,11,14,15
	HOW.4.2 (PR)	Not initiated	All farms
	HOW.4.3	Noncompliance	5,11,14,15
Overtime	HOW.5.1	Noncompliance	All farms
	HOW.5.2 (PR)	Not initiated	All farms
	HOW.6.1	Noncompliance	All farms
	HOW.6.2	Noncompliance	All farms
	HOW.6.3 (PR)	Not initiated	All farms
	HOW.7	Not Applicable	All farms
Public Holidays and Leave	HOW.8.1	Noncompliance	All farms
	HOW.8.2	Noncompliance	All farms
	HOW.9	Not Applicable	
	HOW.10.1	Not Applicable	
	HOW.11 (PR)	Not Applicable	
	HOW.12.1 (PR)	Not Applicable	
	HOW.12.2 (PR)	Not initiated	All farms
	HOW.13	In Compliance	
	HOW.14	In Compliance	
	HOW.15 (PR)	In compliance	
HOW.16 (PR)	Not initiated	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 favourable 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>	Noncompliance in all farms
<p>Findings/Noncompliance Explanation</p> <p>Assessors verified that neither farmers nor workers know the national laws and regulations concerning hours of work, public holidays, and leave.</p> <p>The assessors verified through interviews with farmers and workers that working hours were 07:00-18:00 for six migrant worker groups (1,2,3,6,10,11) and 08:00-18:00 for the remaining visited farms. The break times were approximately 2 hours, with 1 hour for lunch and two 30-minute tea breaks. This makes daily working hours 8 and 9 and weekly working hours covering continuous seven days of work 56 and 63 hours, which is above the legal requirements of a maximum weekly working time of 45 hours as overtime is unpaid. This is also above 60 hours for the six migrant worker groups.</p> <p><u>Source:</u> Documentation, interviews & observation</p>	
<p>Company Action Plan</p>	

Activity	<p>Since the workers come to work from the provinces they are in, they receive a wage per day they work. They work every day because they do not receive a wage on the day they are not working, and they have about 30 days for the hazelnut harvest. For this reason, workers prefer to work every day when it is not raining.</p> <p>Workers and farmers will receive information on practices and procedures regarding working hours, permits, and rest periods. The training module will be updated.</p> <p>The Commission's decision will be disseminated in our region. The commission decision will be announced to all workers and farmers before the hazelnut harvest begins. Compliance will be encouraged if the Commission's decision is not complied with.</p> <p>Training will be given to 1000 workers in Şanlıurfa province in January and at least 500 workers in Ordu, Giresun, in August. This training will be given to 200 farmers and 25 labor contractors.</p> <p>Brochures will be prepared for workers and farmers. It will be distributed to workers in February and farmers throughout the year. The brochure will address floods and landslides.</p>
Output indicators (targeted results)	Awareness will be created among farmers and workers.
Timeline and Deadline Date	2024 August
Input (budget/resources)	Three full-time agricultural engineers and one full-time social worker, one temporary social worker training costs and cost of the brochure
Responsible staff (title/department)	<p>Emine ANKARALI (sustainability and social compliance manager)</p> <p>Bünyamin SIVRİ (agricultural engineer)</p> <p>Hüsrev AKKAYA (agricultural engineer)</p> <p>Hayrullah KADİM (agricultural engineer)</p>

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 protect 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 farms 5,,11,14,15</p>
Findings/Noncompliance Explanation	<p>According to the legal requirement, working hours for pregnant and nursing workers is 7.5 hours/per day and 8 hours/per day for young workers. However, all these workers in protected workers categories were detected by assessors to work the same working hours, between 8 and 9 hours a day, like any other adult worker. No regulation has been implemented for protected and disadvantaged workers.</p> <p><u>Source:</u> Documentation, interviews & observation</p>
Company Action Plan	
Activity	<p>The procedure containing the working conditions of workers working under special conditions will be updated. This procedure will be announced to all farmers and workers through training.</p> <p>To raise awareness on the issue, whether there is a young worker, disabled worker, or pregnant worker in the incoming group will be recorded through the worker registration form.</p>

	Working conditions of pregnant and young workers will be added to the brochures.
Output indicators (targeted results)	Awareness will be created among farmers and workers.
Timeline and Deadline Date	2024 August
Input (budget/resources)	Three full-time agricultural engineers and one full-time social worker, one temporary social worker training costs and cost of the brochure
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager) Bünyamin SİVRİ (agricultural engineer) Hüsrev AKKAYA (agricultural engineer) Hayrullah KADİM (agricultural engineer)

Overtime	
Benchmarks	Compliance Status
<p>HOW.5.1: Where national laws, regulations, and procedures allow it, employers may calculate regular hours of work as an average over longer than one week, provided all formal and procedural requirements attached to such calculation are met (for instance, obtaining official permission from the relevant authorities or observing limits to the period during which such calculations can be made). However, for the purpose of overtime calculation, regular hours of work may not exceed 48 hours per week, irrespective of whether national law provides or not a limitation.</p> <p>HOW.6.1: Employers shall not require workers to work more than the overtime hours allowed by the law of the country where the workers are employed.</p> <p>HOW.6.2: All overtime work shall be voluntary.</p>	Noncompliance in all farms
Findings/Noncompliance Explanation	<p>All of the worker groups worked more than the legal number of hours per week (45 hours), between 56 and 63 hours. These workers are not paid for any overtime hours above the legal regular working hours. The farmers and workers verbally agree on total days of work against the agreed daily wage without calculation of premium for any overtime hour. The workers have to accept this deal to work on the farm.</p> <p>There is no awareness of working hours and overtime among farmers and workers.</p> <p>The interviewed workers stated that the working hours are long.</p> <p><u>Source:</u> Documentation, interviews & observation</p>
Company Action Plan	
Activity	Lobbying activities regarding overtime payments will be carried out with public institutions, private sector representatives, NGOs, and local governments.
Output indicators (targeted results)	Lobbying activities will be carried out.
Timeline and Deadline Date	2024 August
Input (budget/resources)	Three full-time agricultural engineers and one full-time social worker
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager) Bünyamin SİVRİ (agricultural engineer) Hüsrev AKKAYA (agricultural engineer) Hayrullah KADİM (agricultural engineer)

Public Holidays and Leave	
Benchmarks	Compliance Status
HOW.8.1: Employers shall provide workers with all official public holidays as required under national laws, regulations, and procedures. HOW.8.2: Employer may engage with workers on a specific working scheme which allows workers to work on holidays if voluntarily agreed by the workers without any pressure to accept or retaliation if refuse.	Noncompliance in all farms
Findings/Noncompliance Explanation	<p>There is no implementation of rights of public holidays, sick leave, or rest days for workers in assessed farms. If a worker is ill, s/he can go home to rest or is taken to the hospital as unpaid leave.</p> <p>Since no permanent or long-term work is applicable in the hazelnut harvest employment, annual leave is not applicable.</p> <p>August 30th is a public holiday, and workers worked on this date. Twice the daily wage must be paid for this work. However, It was observed that groups of workers working on this date received regular daily wages.</p> <p><u>Source:</u> Documentation, interviews & observation</p>
Company Action Plan	
Activity	<p>Since there is no permanent and long-term work in the hazelnut harvest, there is no annual leave, and lobbying activities will be carried out to improve this area.</p> <p>Working hours, public holidays, sick leave, or rest days will be added to the brochures.</p>
Output indicators (targeted results)	Lobbying activities will be carried out.
Timeline and Deadline Date	2024 August
Input (budget/resources)	Three full-time agricultural engineers and one full-time social worker
Responsible staff (title/department)	<p>Emine ANKARALI (sustainability and social compliance manager)</p> <p>Bünyamin SİVRİ (agricultural engineer)</p> <p>Hüsrev AKKAYA (agricultural engineer)</p> <p>Hayrullah KADİM (agricultural engineer)</p>

Compensation

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	C.1.1	Risk of Noncompliance	1,4,6,7,11
	C.1.2	Risk of Noncompliance	1,4,6,7,11
	C.1.3	Risk of Noncompliance	1,4,6,7,11
	C.1.4	Not Applicable	
Minimum Wage/Fair Compensation	C.2.1	Risk of Noncompliance	1,4,6,7,11
	C.2.2	In Compliance	

	C.2.3	In Compliance	
	C.2.4 (PR)	Not initiated	All farms
	C.2.5 (PR)	In compliance	
	C.2.6 (PR)	Not initiated	All farms
	C.3	Not Applicable	
Farmer/Producer Income	C.4 (PR)	Not initiated	All farms
Wage Payment and Calculation	C.6	In Compliance	
	C.7.1	In Compliance	
	C.7.2	In Compliance	
	C.7.3 (PR)	Not initiated	All farms
	C.7.4 (PR)	Not initiated	All farms
	C.7.5	In Compliance	
	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 Applicable	
	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	5,9,13
	C.11.1.2	Not Applicable	All farms
	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	In Compliance	

Compensation Assessment Summary

General Compliance	
Benchmarks	Compliance Status
<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>C.1.2: Other than lawfully required deductions, no other deductions may be made from a worker's compensation without the written consent of the worker. Financial disciplinary measures are prohibited.</p> <p>C.1.3: In countries where local law does not specify compensation specific to the agriculture sector, the participating Company shall consult with local stakeholders representing the employers (farmers), workers, local government and commissions, and civil society to define the appropriate wage level. As a general principle, employers shall follow the minimum wage standards set for other sectors in the same region.</p>	<p>Risk of Noncompliance in farms 1,4,6,7,11</p>
<p>Findings/Noncompliance Explanation</p> <p>The verifiers noted that the farmers are aware of the minimum legal wage.</p> <p>There are no financial disciplinary measures, but there are deductions in the wages of the seasonal migrant workers. These workers are recruited through a labor contractor who deducts about 10% of the worker's wage as his intermediary Commission (1,4,6,7,11). This deduction is a prerequisite for finding a job and working at the farm since the labor contractor reaches an agreement with the farmer a couple of months before the harvest. Both farmers and workers know the deduction.</p> <p><u>Source:</u> Documentation, interviews & observation</p>	
<p>Company Action Plan</p>	

Activity	The most crucial step to prevent this interruption is to labor contractors. In this direction, we are carrying out the Harvesting The Future project carried out by the FLA. We find and map undocumented labor contractors at harvest times. We hold talks with İŞKUR during the term to train labor contractors and support them in obtaining the labor contractor certificate. So far, we have had 28 labor contractors get labor contractor certificates. This year, we will train two labor contractors in January and support them in obtaining this certificate. It aims to prevent these cuts with the training we will give a labor contractor.
Output indicators (targeted results)	Awareness will be raised among labor contractors. The labor contractor will be mapped and documented.
Timeline and Deadline Date	2024 March
Input (budget/resources)	One full-time social worker training costs
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager)

Minimum Wage/Fair Compensation	
Benchmarks	Compliance Status
C.2.1: Employers shall pay workers at least the legal minimum wage, the prevailing industry sector wage, or the wage pursuant to Collective Bargaining Agreements that are in force, whichever is higher, for regular working hours (not including overtime). Hourly or daily compensation shall be calculated based on the legal minimal wage, the prevailing industry sector wage, or the wage pursuant to Collective Bargaining Agreements that are in force, whichever is higher. Workers should also be informed by the employer about the legal minimum wage applicable to them.	Risk of Noncompliance in farms 1,4,6,7,11
Findings/Noncompliance Explanation	<p>The daily legal minimum wage was announced as 447,15 TL/day by the Ministry of Labor and Social Security. In all assessed farms, the assessors reported that farmers would agree to pay at least 550 TL/day to the workers directly or through labor contractors when applicable. The labor contractors deduct 10 % of the seasonal migrant worker's wages. Workers and farmers reported that after the deduction of labor contractors for their Commission, a wage of 500 TL/day would be paid to workers. However, the deduction of labor commissions prevails as a risk for workers receiving wages below the legal minimum wage.</p> <p>The farmers pay the labor contractors, so how much is paid to the workers afterward is not followed by the farmers, such as on farms 1, 4, 6, 7, and 11.</p> <p><u>Source:</u> Documentation, interviews & observation</p>
Company Action Plan	
Activity	It has been explained above.
Output indicators (targeted results)	Awareness will be raised among labor contractors. The labor contractor will be mapped and documented.
Timeline and Deadline Date	2024 March
Input (budget/resources)	One full-time social worker training costs
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager)

Wage Payment and Calculation	
Benchmarks	Compliance Status
<p>C.8.1: Employers shall compensate workers for all hours worked.</p> <p>C.8.2: Employers shall comply with all applicable laws, regulations, and procedures governing the payment of premium rates for work on holidays, rest days, and overtime. There might, however, be specific working schemes voluntarily agreed by the workers to work on holidays and rest days for short-term seasonal work, which would make this provision not applicable.</p> <p>C.8.3: Workers shall be informed in writing or orally, where necessary, in language(s) spoken by workers, about overtime wage rates before undertaking overtime.</p>	Noncompliance in all farms
Findings/Noncompliance Explanation	<p>The workers were not informed about the overtime and overtime rates before agreeing to the overtime work. They are also not paid for the overtime.</p> <p>The farmer agrees on one standard wage for total daily working hours with labor contractors or workers directly without any agreement for overtime payments.</p> <p>Farmers working with seasonal agricultural workers make the payment either to the agricultural labor intermediary or to the supervisor. It was noted that whether or not the payment was transferred to the workers was not followed up.</p> <p><u>Source:</u> Documentation, interviews & observation</p>
Company Action Plan	
Activity	It has been explained above.
Output indicators (targeted results)	<p>Awareness will be raised among labor contractors.</p> <p>The labor contractor will be mapped and documented.</p>
Timeline and Deadline Date	2024 March
Input (budget/resources)	One full-time social worker training costs
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager)

Workers Awareness	
Benchmarks	Compliance Status
<p>C.11.1: Employers shall make every reasonable effort to ensure workers understand their compensation, including:</p> <p>C.11.1.1: the calculation of wages,</p>	Noncompliance in farms 5, 9, 13
<p>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.</p>	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation	<p>Most of the workers are aware of the legal minimum wage for hazelnut harvest. However, assessors note that not all workers, such as farms 5,9 and 13, are informed about their wages before starting work.</p> <p><u>Source:</u> Documentation, interviews & observation</p>
Company Action Plan	
Activity	The wage determined by the Commission will be announced to all, local and seasonal workers. The commission decision will also be shared and disseminated in farmer WhatsApp groups. It is aimed to raise awareness of at least 500 workers during the hazelnut harvest season.

Output indicators (targeted results)	Awareness will be raised among farmers and workers.
Timeline and Deadline Date	2024 August
Input (budget/resources)	One full-time social worker training costs
Responsible staff (title/department)	Emine ANKARALI (sustainability and social compliance manager)

Overview - Farms vs. Noncompliances

Total number of Farms: 15

	Employment Relationship	Non-discrimination	Harassment or Abuse	Forced Labor	Child Labor	Freedom of Association and Collective	Health, Safety and Environment	Hours of Work	Compensation	Total
% of farms with one or more noncompliances or risk of noncompliance	100%	100%	100%	0%	27%	100%	100%	100%	100%	
Total number of benchmarks (excl. progressive benchmarks)	48	14	19	19	9	25	16	19	27	196
Farm No. 1	25	7	1	0	0	0	3	9	9	62
Farm No. 2	18	7	1	0	0	0	3	9	5	51
Farm No. 3	19	7	1	0	0	0	3	9	5	52
Farm No. 4	21	7	1	0	0	0	3	9	9	58
Farm No. 5	22	6	1	0	3	0	3	11	6	60
Farm No. 6	24	7	1	0	0	0	3	9	9	61
Farm No. 7	20	7	1	0	0	0	3	9	9	57
Farm No. 8	19	7	1	0	0	0	3	9	5	52
Farm No. 9	18	7	1	0	0	0	3	9	6	52
Farm No. 10	18	7	1	0	0	0	3	9	5	52
Farm No. 11	24	7	1	0	6	0	3	11	9	69
Farm No. 12	22	6	1	0	0	0	3	9	5	54
Farm No. 13	22	6	1	0	0	0	3	9	6	55
Farm No. 14	22	6	1	0	3	0	3	11	5	59
Farm No. 15	22	6	1	0	6	0	3	11	5	62
TOTAL	316	100	15	0	18	0	45	143	98	855

Average % of compliance per code element	56.11	52.38	94.74	100.00	86.67	100.00	81.25	49.82	75.80	77.41
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