



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	Yavuz
Country	Türkiye
Crop	Hazelnut
Production process	Harvest
Assessment location	Sakarya, Karasu
Monitor	CSR & Sustainability Services
Assessment dates	September 4-6, 2023
Number of assessed farms	15
Total area covered	113.43 acre
Number of farmers interviewed	15
Total number of workers	242
Number of workers interviewed	105

Employment Relationship

Compliance Status

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

	ER.20.3 (PR)	Not initiated	All farms
	ER.20.4	Noncompliance	All farms
	ER.20.6	Noncompliance	All farms
	ER.20.7	Noncompliance	All farms
	ER.20.8	Noncompliance	All farms
	ER.20.9 (PR)	Not initiated	All farms
	ER.20.11	Noncompliance	All farms
Access to Training for Family Members	ER.21	Risk of Noncompliance	1,3,4,5,6,7,8,9,10,11,13,14,15
HSE Management System	ER.24.1.	Risk of Noncompliance	1,2,3,4,5,6,7,8,9,10,11,12,15
	ER.24.2 (PR)	In Compliance	All farms
	ER.24.3	In Compliance	All farms
	ER.24.4.1 (PR)	In progress	All farms
	ER.24.4.2 (PR)	In progress	All farms
	ER.24.4.3 (PR)	In progress	All farms
	ER.24.4.4 (PR)	In progress	All farms
	ER.24.4.5 (PR)	In progress	All farms
	ER.24.4.6 (PR)	In progress	All farms
Grievance Procedures	ER.24.5 (PR)	In progress	All farms
	ER.25.1 (PR)	In progress	All farms
	ER.25.2 (PR)	In progress	All farms
	ER.25.3	Risk of Noncompliance	1,2,4,7
	ER.25.4	Risk of Noncompliance	1,2,4,7

Employment Relationship Assessment Summary

Notable Good Practices

Yavuz also conducted worker training in workers' cities of origin in 2023. They cooperated with two other FLA-affiliated companies (ofi and Sabirlar) in 2022, accessing more than 2500 workers in Sanliurfa and Diyarbakir. 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 cities of origin, 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 1,3,5,7,8,12
Findings/Noncompliance Explanation	<p>Monitors couldn't review any contract or document of written terms and conditions.</p> <p>Collecting the hazelnut from the ground or branches is the main task in the hazelnut harvest. In addition, filling the hazelnuts in sacks and transferring them to the vehicles can be additional tasks. Apart from these, the workers do not usually work in spraying, pruning, or cleaning the soil. This year, a group among the interviewed workers had arrived in the region before the harvest season and worked in pruning at farm 3.</p> <p>Interviewed workers at farms 1,3,5,7,8,12 knew what tasks were expected from them and what the working hours were. However, the net wage they would receive</p>

	<p>at the end of the job was unknown. The awareness was especially low among the female and young workers.</p> <p>Farmers reported that they knew the minimum daily wage, 447,15 TL, but no local authority announced the working hours or the daily net minimum wage in 2023. They learned the daily minimum wage from TV, the internet, and village headmen.</p> <p><u>Source</u>: Interviews, documentation, and Ministry of Labor and Social Security pronouncement.</p>
Company Action Plan	
Activity	Since all local authorities make different statements, there are differences among workers regarding wages, and confusion occurs. All our producers within the scope of FLA will be informed on this subject and about the wages of hazelnut agricultural workers during recruitment.
Output indicators (targeted results)	Eliminate confusion about wages Ensuring workers are informed about wages
Timeline and Deadline Date	November 2023 - September 2024
Input (budget/resources)	Human Resources
Responsible staff (title/department)	Mehmet Esat İSMAİL [Sustainability coordinator/ Sustainability] Zeynep KILIÇ [Agricultural engineer/ Sustainability]

Recruitment and Hiring	
Benchmarks	Compliance Status
<p>ER.3.1: Employers shall verify proof of age documentation for all young workers in the farm at the time of their employment and work towards collecting and maintaining all documentation necessary to confirm and verify date of birth of all workers, including long term and casual workers.</p> <p>ER.3.1.1: Employers shall take reasonable measures to ensure such documentation is complete and accurate.</p> <p>ER.3.1.2: In those cases where proof of age documentation is not readily available or unreliable, employers shall take all necessary precautions which can reasonably be expected of them to ensure that all workers are at least the minimum legal working age, including requesting and maintaining medical or religious records of workers, or through other means considered reliable in the local context.</p>	<p>Noncompliance in farms 1,2,3,4,5,6,7,9,10,13,15</p>
<p>ER.4: Employers shall not use employment agencies/labour contractors that rely on any practice that is linked to using false information to recruit workers; restricting workers' freedom of movement; requiring workers to pay recruitment and/or employment fees; withholding from workers a copy of their employment contract in their native language that sets forth the general terms and conditions of engagement and employment; retaining possession or control of workers identification and other documents like passports, identity papers, work permits, and other personal legal documents; punishing workers for terminating employment.</p> <p>ER.5.1: No worker hired by an employment agency or a labour contractor shall be compensated below the legal minimum wage. The same rights as provided for directly hired contract workers apply for workers hired via an employment agency or labor intermediary.</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 labour contractor shall pay a fee or get a reduction by applying a fee over his salary.</p> <p>ER.7: Employers may hire temporary, casual, daily, seasonal or migrant workers only when:</p> <p>ER.7.6: contract, temporary, casual, daily, seasonal, or migrant workers receive at least the minimum wage or the prevailing industry wage, whichever is higher, and all legally mandated benefits such as social security, other forms of insurance, annual leave, and holiday pay;</p>	<p>Noncompliance in farms 1,2,4,5,12</p>
<p>ER.7: Employers may hire temporary, casual, daily, seasonal or migrant workers only when:</p> <p>ER.7.7: farm rules and regulations apply to contract, temporary, casual, daily, seasonal, or migrant workers the same as for permanent workers;</p> <p>ER.7.8: contract, temporary, casual, daily, seasonal or migrant workers are given priority when the farm is seeking 'new' permanent employees provided they have the relevant skills required. Contract, temporary, casual, daily, seasonal or migrant workers are prioritized when the farm seeks 'new' permanent employees provided they have the required skills.</p>	<p>Noncompliance in all farms</p>
Findings/Noncompliance Explanation	The monitors confirmed through interviews with farmers and workers at farms 8,11,12,14 that farmers conduct age verifications by checking IDs. In the remaining farms, farmers either check ages just verbally or not at all.

	<p>Monitors verified that among 15 visited farms, one farmer was working with local worker groups (farm 6); the remaining 14 had hired seasonal agricultural migrant workers. Local worker groups do not have an agricultural labor contractor; it is an uncommon practice for them. Seasonal migrant workers were commonly recruited through a labor contractor. It was determined that at 5 out of the 14 farms working with seasonal migrant worker groups, the labor contractors deducted their commissions from the daily earnings of the workers (1,2,4,5,12).</p> <p>Farmers who had hired seasonal agricultural migrant workers paid the determined minimum daily wage of 450TL/day to the agricultural labor contractor. The brokerage commission of the labor contractor was generally known as 10%. After the commission deduction, the workers received below the legal minimum wage.</p> <p>Social security and other forms of insurance are not paid to local or seasonal migrant workers.</p> <p><u>Source:</u> Documentation, interviews, and observations</p>
Company Action Plan	
Activity	Within the scope of the commission received from the workers, agricultural worker intermediaries will be visited and informed in the regions where they live.
Output indicators (targeted results)	Ensuring that workers receive more than the daily legal minimum wage
Timeline and Deadline Date	November 2023 September 2024
Input (budget/resources)	Human Resources
Responsible staff (title/department)	Mehmet Esat İSMAİL [Sustainability coordinator/ Sustainability] Zeynep KILIÇ [Agricultural engineer/ Sustainability]

Terms and Conditions	
Benchmarks	Compliance Status
ER.9.1: Workers should be made aware of the employment terms under which they are engaged. ER.9.2: Employment terms shall be those to which the worker has voluntarily agreed, provided those terms do not fall below: ER.9.2.1: provisions of national laws; ER.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. ER.12.2: Where a union exists on the farm, employers shall make available a copy of the collective bargaining agreement to all workers and other interested parties. 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.	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
Findings/Noncompliance Explanation	At all farms, seasonal migrant workers were given verbal information on how to conduct their tasks in a 10-20 minute meeting before starting the work. Farmers discuss wage details only with their supervisors or labor contractors. Workers were informed verbally about working hours and wages or not at all and were left to know when the work would start and the wages would be paid.

	<p>Since the terms of employment are not based on any written contract, it allows the farmers to terminate the workers' employment and not pay their wages. The interviewed farmers and workers reported that the farmers do not use wages as a penalty; they never refuse to pay wages as a form of penalty.</p> <p>Monitors did not meet pregnant or disabled workers during the worker interviews and farm walkthroughs. However, there were 50 migrants (31 female and 19 male) and, one local female, a young worker between the ages of 15-17, and 1 male and three female migrant child workers under the age of 15. It has been observed that young or child workers work at the same time as adult workers and perform the same tasks as adults.</p> <p>Last year, the Company distributed booklets instead of worker training. The Company continues the practice this year as well. At the time of the assessment, there were still groups of workers who had not yet received the booklets.</p> <p>It has been observed that farmers who have been newly involved in the FLA program for 1-2 years have lower awareness about labor rights and social issues compared to others.</p> <p><u>Source:</u> Documentation, interviews, and observations</p>
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Company Action Plan

Activity	Within employment conditions, at least 500 FLA producers, 30 agricultural worker intermediaries, and 900 hazelnut agricultural workers will be informed in the 2023-2024 season.
Output indicators (targeted results)	Raising awareness about employment
Timeline and Deadline Date	November 2023 September 2024
Input (budget/resources)	Human Resources
Responsible staff (title/department)	Mehmet Esat İSMAİL [Sustainability coordinator/ Sustainability] Zeynep KILIÇ [Agricultural engineer/ Sustainability]

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 1,2,7,8,9,10,11,13
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 farmers provide this advance payment and the amount the employer paid will be deducted from their compensation. Both parties verbally agree upon this. Advance payments are not correctly documented; each side keeps track of the payment.</p> <p>However, the fact that the advance 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>The farmers paid between 12.000TL and 25.000TL for the transportation cost of the workers working at farms 1,2,7,8,9,10,11. This is not considered an advance payment but more a support to workers to reach the region. With the increase in fuel prices, this practice was seen last year and has spread even more this year.</p>

	<u>Source:</u> Documentation, interviews, and observations
Company Action Plan	
Activity	During the inspections we conduct during harvest, we are trying to make a seasonal agricultural worker contract between our producers and their workers. In this context, we are trying to prevent future disputes. During the 2023 hazelnut harvest, 71 FLA producers were made to sign a seasonal agricultural worker contract.
Output indicators (targeted results)	Increasing the number of workers signing agricultural labor contracts
Timeline and Deadline Date	November 2023 September 2024
Input (budget/resources)	Human Resources
Responsible staff (title/department)	Mehmet Esat İSMAİL [Sustainability coordinator/ Sustainability] Zeynep KILIÇ [Agricultural engineer/ Sustainability]

Work Rules and Discipline	
Benchmarks	Compliance Status
ER.20.1: Employers shall have disciplinary rules and practices that embody a system of progressive discipline (e.g. a system of maintaining discipline through the application of escalating disciplinary action moving from verbal warnings to written warnings to suspension and finally to termination). ER.20.2: Any person supervising workers shall be aware of the disciplinary rules and practices. ER.20.4: The disciplinary system shall be applied in a fair and non-discriminatory manner and include a management review of the actions by someone senior to the manager who imposed the disciplinary action. ER.20.6: Disciplinary rules and practices shall be clearly communicated to all workers. ER.20.7: Workers must be informed when a disciplinary procedure has been initiated against them. ER.20.8: Workers have the right to participate and be heard in any disciplinary procedure against them. ER.20.11: The disciplinary system shall include a third party witness during imposition, and an appeal process. In the case of smallholder settings, the existing appeal mechanism at the community level is acceptable.	Noncompliance in all farms
Findings/Noncompliance Explanation	<p>The monitors verified that there are no written or verbal disciplinary rules at the farm level; no disciplinary rules are communicated to workers.</p> <p>Depending on the case and the farmer's expectations, the farmer or the labor contractor can take disciplinary action as they see fit.</p> <p>In general, the worst scenario of disciplinary action is to terminate the worker's employment through the labor contractor if the farmer is not satisfied with the work performance. In this case, they make the payment up to that time. Most farmers stated they had a constructive and positive approach to discipline issues.</p> <p><u>Source:</u> Documentation, interviews, and observations</p>
Company Action Plan	
Activity	During the inspections we carry out during harvest, we try to sign a seasonal agricultural worker contract between our producers and their workers. By signing the contracts, the obligations of the employer, intermediary, and workers are determined. In the 2023 hazelnut harvest, 71 FLA producers signed seasonal agricultural worker contracts. It is aimed to have 80 FLA producers sign seasonal agricultural worker contracts in the 2024 hazelnut harvest.
Output indicators (targeted results)	By signing seasonal worker contracts, workers and producers know the working rules and work discipline.

Timeline and Deadline Date	November 2023 September 2024
Input (budget/resources)	Human Resources
Responsible staff (title/department)	Mehmet Esat İSMAİL [Sustainability coordinator/ Sustainability] Zeynep KILIÇ [Agricultural engineer/ Sustainability]

Access to Training for Family Members	
Benchmarks	Compliance Status
ER.21: Family members (spouses and adult children) involved directly or indirectly in agriculture production shall have access to all training and awareness-raising activities conducted for the workers and growers on the farms.	Risk of Noncompliance in farms 1,3,4,5,6,7,8,9,10,11,13,14,15
Findings/Noncompliance Explanation	The interviews verified that only very rarely family members were participating in the trainings. In general, they are more likely to leave it to the men in the family. <u>Source:</u> Documentation, interviews, and observations
Company Action Plan	
Activity	Training is organized by visiting workers and agricultural worker intermediaries in the regions where they live. In this way, all family members can be reached.
Output indicators (targeted results)	Ensuring the participation of all individuals in training
Timeline and Deadline Date	November 2023 September 2024
Input (budget/resources)	Human Resources
Responsible staff (title/department)	Mehmet Esat İSMAİL [Sustainability coordinator/ Sustainability] Zeynep KILIÇ [Agricultural engineer/ Sustainability]

HSE Management System	
Benchmarks	Compliance Status
ER.24.1: Health, safety, and environmental rules shall be communicated to all workers in the local language or language spoken by workers if different from the local language.	Risk of Noncompliance farms 1,2,3,4,5,6,7,8,9,10,11,12,15
Findings/Noncompliance Explanation	Workers who attended worker trainings in the past tend to recall the HSE issues. However, the new workers/workers who did not attend trainings in the past were unaware of the HSE issues. For awareness raising, the Company also prepared an educational booklet for workers and farmers this year. The Company delivers training in the cities of origin of the workers, covering HSE issues, but prefers not to deliver harvest training. Sometimes, the farmers discuss some conditions before workers work in the gardens. However, it was observed that they mainly give simple warnings such as "Do not slip, do not fall, watch your eyes." <u>Source:</u> Documentation, interviews, and observations

Company Action Plan	
Activity	Since the worker supply chain in hazelnut agriculture is very variable, the hazelnut harvest is short and goes through inspection processes; our producers and employees, whom we could not reach during the inspection during the harvest period, are contacted and informed after the inspection. In addition, training is provided within the scope of this finding by visiting our agricultural workers in the region where they live. In this context, training is planned to be provided to 30 agricultural intermediaries and 900 agricultural workers in the 2023-2024 hazelnut season.
Output indicators (targeted results)	Communicating health, safety, and environmental rules to all actors and increasing their awareness
Timeline and Deadline Date	November 2023 September 2024
Input (budget/resources)	Human Resources
Responsible staff (title/department)	Mehmet Esat İSMAİL [Sustainability coordinator/ Sustainability] Zeynep KILIÇ [Agricultural engineer/ Sustainability]

Grievance Procedures		
Benchmarks	Compliance Status	
ER.25.3: FLA-affiliated companies shall ensure 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 address the issue sufficiently. 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 1,2,4,7	
Findings/Noncompliance Explanation	<p>Farmers are unaware that there is a "confidential noncompliance reporting mechanism." Farmers stated they can convey complaints and requests to the Company's agricultural engineers.</p> <p>Workers who received booklets were aware that there was a hotline. Worker groups working in farms 1, 2, 4, 7, and 10 stated that they had not heard of this line. On the other hand, workers reported that they would instead reach the supervisor, labor contractor, the state's emergency phone lines, or the gendarmerie when they had a complaint. This verified that the complaint hotline was not the first choice of workers to share grievances.</p> <p><u>Source:</u> Documentation, interviews, and observations</p>	
Company Action Plan		
Activity	Please see 24.1 of the election management system.	
Output indicators (targeted results)	It is aimed that our suggestion, request, and complaint channels are known and implemented by all actors.	
Timeline and Deadline Date	November 2023 September 2024	
Input (budget/resources)	Human Resources	

Responsible staff (title/department)	Mehmet Esat İSMAİL [Sustainability coordinator/ Sustainability] Zeynep KILIÇ [Agricultural engineer/ Sustainability]
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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	1,2,4,5,7,8,9,10,11,13
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	In Compliance	
	ND. 9	Not Applicable	
Respect for 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	<p>The farmers do not know any local laws, regulations, or judicial processes related to non-discrimination. They are not clear on the definition and scope of discrimination. They have a general idea and sensitivity to non-discrimination.</p> <p>Farmers reported that they prefer working with local workers based on their performance. They believe that local workers are more experienced and know the details of the work. In contrast, it can be challenging to work with seasonal migrant workers, in their opinion, as they cannot communicate easily.</p> <p><u>Source:</u> Documentation, interviews & observation</p>
Company Action Plan	

Activity	Within the scope of discrimination, training will be provided to at least 500 FLA producers, 30 agricultural intermediaries, and 900 workers in the 2023-2024 season.
Output indicators (targeted results)	To explain the concept of discrimination and to ensure understanding of discrimination.
Timeline and Deadline Date	November 2023 September 2024
Input (budget/resources)	Human Resources
Responsible staff (title/department)	Mehmet Esat İSMAİL [Sustainability coordinator/ Sustainability] Zeynep KILIÇ [Agricultural engineer/ Sustainability]

Recruitment and Employment Practices	
Benchmarks:	Compliance Status
ND.2.1: Recruitment and employment practices shall be free from any type of discrimination. ND.2.3: If not provided by law, employers must provide protection to workers who allege any type of discrimination in recruitment and employment practices.	Noncompliance in all farms
Findings/Noncompliance Explanation	None of the visited farmers or interviewed labor contractors have a non-discrimination policy. They are familiar with the concept of non-discrimination in a broad sense. There is no communication or briefing to workers related to any of the non-discrimination policies or regulations. The farmer and labor contractor have no system to ensure that recruitment and employment practices are free from any type of discrimination. Compensation discrimination exists as local and seasonal workers have different wage rates for the same work. <u>Source:</u> Documentation, interviews & observation
Company Action Plan	
Activity	Local authorities distinguish between local and seasonal workers in their wage statements; producers also consider this declaration. Local authorities will be contacted during the 2023-2024 hazelnut season, and efforts will be made to prevent discrimination in these statements.
Output indicators (targeted results)	It aims to eliminate local authorities' lack of knowledge about discrimination.
Timeline and Deadline Date	November 2023 September 2024
Input (budget/resources)	Human Resources
Responsible staff (title/department)	Mehmet Esat İSMAİL [Sustainability coordinator/ Sustainability] Zeynep KILIÇ [Agricultural engineer/ Sustainability]

Compensation Discrimination	
Benchmarks	Compliance Status
ND.3: There shall be no differences in compensation for workers performing equal work or work of equal value based on gender, race, religion, age, disability, sexual orientation, nationality, political opinion, social group, ethnic origin, employment status (e.g., local workers vs. migrant workers), or membership in unions or other workers' representative bodies.	Noncompliance in farms 1,2,4,5,7,8, 9,10,11,13

Findings/Noncompliance Explanation	The monitors detected discrimination practices in terms of compensation. The farmers reported that seasonal migrant workers were paid between 450 and 500 TL/day, whereas local groups were paid 500 to 700 TL/day. Furthermore, assessors verified through interviews with farmers, labor contractors, and workers that seasonal workers work 1 hour longer than local workers. <u>Source:</u> Documentation, interviews & observation
Company Action Plan	
Activity	Please see Article 2.1 in the recruitment and employment practices section.
Output indicators (targeted results)	Please see 2.1 (output indicators) in the recruitment and employment practices section.
Timeline and Deadline Date	November 2023 September 2024
Input (budget/resources)	Human Resources
Responsible staff (title/department)	Mehmet Esat İSMAİL [Sustainability coordinator/ Sustainability] Zeynep KILIÇ [Agricultural engineer/ Sustainability]

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 purposely exclusion from the training or communication for any workers. On the other hand, due to the language of the training and communications, which are in Turkish, workers who have difficulties understanding or reading Turkish or are illiterate could face difficulties getting the 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	We visit our producers within the scope of the supply chain in the regions where they live and inform them. In the training we provide, translators (agricultural intermediaries, sergeants, or students) are used for workers who do not speak Turkish.
Output indicators (targeted results)	Increasing the effectiveness of the training provided
Timeline and Deadline Date	November 2023 September 2024
Input (budget/resources)	Human Resources
Responsible staff (title/department)	Mehmet Esat İSMAİL [Sustainability coordinator/ Sustainability] Zeynep KILIÇ [Agricultural engineer/ Sustainability]

Marital or Pregnancy-Related Discrimination	
Benchmarks	Compliance Status
<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 breast-feeding 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>
Findings/Noncompliance Explanation	
Company Action Plan	
Activity	In this context, at least 500 FLA producers, 30 agricultural intermediaries, and 900 workers will be trained.
Output indicators (targeted results)	Ensuring that new mothers and pregnant workers are given all their rights
Timeline and Deadline Date	November 2023 September 2024
Input (budget/resources)	Human Resources
Responsible staff (title/department)	Mehmet Esat İSMAİL [Sustainability coordinator/ Sustainability] Zeynep KILIÇ [Agricultural engineer/ Sustainability]

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	Risk of Noncompliance	Farm 9
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	
Violence	H/A.13	Not Applicable	
	H/A.8.1	In Compliance	
	H/A.8.2	In Compliance	
Sexual Harassment	H/A.8.3	Not Applicable	
	H/A.9.1	In Compliance	
	H/A.9.2	In Compliance	
	H/A.9.3	In Compliance	
Security Practices	H/A.9.4	In Compliance	
	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
H/A.1.2: Workers at the farm shall not be subject to any corporal punishment, sexual harassment, oppression, coercion or any other kind of mental or physical abuse or intimidation, disregarding whether they are family members without a formal contract or hired staff.	Risk of Noncompliance in farm 9
Findings/Noncompliance Explanation	The awareness about the applicable regulations and penalties among farmers, labor contractors, and workers was low. At farm 9, the monitors noticed the farmer's wife was yelling at the female workers. When the workers were asked about this situation during interviews, they said they felt stressed and disturbed. <u>Source:</u> Documentation, interviews & observation
Company Action Plan	
Activity	Discrimination related to marriage or pregnancy is mentioned in Article 6.1 (activity)
Output indicators (targeted results)	Ensuring workers work in a safe environment
Timeline and Deadline Date	November 2023 September 2024
Input (budget/resources)	Human Resources
Responsible staff (title/department)	Mehmet Esat İSMAİL [Sustainability coordinator/ Sustainability] Zeynep KILIÇ [Agricultural engineer/ Sustainability]

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	2,3,4,11
Minimum Age	CL.2	Noncompliance	2,3,4,11
Immediate Family Members	CL.3	Noncompliance	2,3,4,11
Right to Education	CL.4.1 (PR)	In compliance	All farms
Young Workers	CL.5	In Compliance	All farms
	CL.6.1	Noncompliance	1,2,3,4,5,7,8,9,10,12,13,14,15
	CL.6.2	Noncompliance	1,2,3,4,5,7,8,9,10,12,13,14,15
	CL.7	Noncompliance	1,2,3,4,5,7,8,9,10,12,13,14,15
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

Yavuz worked with two teachers in Sakarya-Resuller to conduct safe space activities with the children staying with their families at the renovated house in Resuller. The activities lasted 15 days, as the regular school term started during the second half of their stay.

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 2,3,4,11
Findings/Noncompliance Explanation	Monitors detected workers under the legal age of 15, working during harvest as harvest workers among seasonal migrant worker groups at four farms (farms 2,3,4 and 11). A boy and a girl at farms 2 & 4 (same worker group, different farmers) were 14 years old. The girl at Farm 3 was 13 years old. The girl at farm 11 was 14 years old.

	They were all 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	
Activity	We carry out unannounced harvest inspections in all our regions during harvest. During these inspections, children are removed from the gardens within the scope of the social compliance removal procedure. In this context, in the 2023 harvest period, 17 girls and 12 boys in the Sakarya region were removed from the gardens and prevented from working.
Output indicators (targeted results)	Preventing children from working in the garden Raising awareness about child labor
Timeline and Deadline Date	November 2023 September 2024
Input (budget/resources)	Human Resources
Responsible staff (title/department)	Mehmet Esat İSMAİL [Sustainability coordinator/ Sustainability] Zeynep KILIÇ [Agricultural engineer/ Sustainability]

Minimum Age	
Benchmarks	Compliance Status
CL.2: Employers shall comply with ILO Convention 138 and shall not employ anyone under the age of 15 or under the age for completion of compulsory education, whichever is higher. If a country has a specified minimum age of 14 years due to an insufficiently developed economy and educational facilities, employers might follow national legislation but must work to raise the minimum age to 15 years progressively.	Noncompliance in farms 2,3,4,11
Findings/Noncompliance Explanation	Monitors interviewed farmers and workers about the minimum working age. When farmers were asked about the legal minimum working age, varying answers were received. 15 and 18 were given as thresholds. Overall, four children below 15 years old were detected at four 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. <u>Source:</u> Documentation, interviews & observation
Company Action Plan	
Activity	Please see CL.2 article (activity) section in the child labor evaluation section.
Output indicators (targeted results)	Please see the child labor assessment section of article CL.2 (output indicators).
Timeline and Deadline Date	November 2023 September 2024
Input (budget/resources)	Human Resources
Responsible staff (title/department)	Mehmet Esat İSMAİL [Sustainability coordinator/ Sustainability] Zeynep KILIÇ [Agricultural engineer/ Sustainability]

Immediate Family Members		
Benchmarks	Compliance Status	
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: <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 2,3,4,11	
Findings/Noncompliance Explanation		
Company Action Plan		
Activity	Please see CL.2 article (activity) section in the child labor evaluation section.	
Output indicators (targeted results)	Please see the child labor assessment section of article CL.2 (output indicators).	
Timeline and Deadline Date	November 2023 September 2024	
Input (budget/resources)	Human Resources	
Responsible staff (title/department)	Mehmet Esat İSMAİL [Sustainability coordinator/ Sustainability] Zeynep KILIÇ [Agricultural engineer/ Sustainability]	

Young Workers		
Benchmarks	Compliance Status	
CL.6.1: Employers shall comply with all relevant laws that apply to young workers, (e.g., those between the minimum legal working age and the age of 18) including regulations related to hiring, working conditions, types of work, hours of work, proof of age documentation, and overtime. CL.6.2: Employers shall maintain a list of all young workers, their entry dates, proof of age, and description of their assignment. CL.7: No person under the age of 18 shall undertake hazardous work, i.e., work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of persons under the age of 18. Such work includes, but is not limited to, the application of agricultural chemicals, pesticides, and fertilizers, use of farm equipment tools and machinery, lifting or moving of heavy materials or goods, or carrying out hazardous tasks such as underground or underwater or at dangerous heights. Every activity performed by a young worker must be supervised by an adult.	Noncompliance in farms 1,2,3,4,5,7,8,9,10,12,13,14,15	
Findings/Noncompliance Explanation		

	<p>The workers working at farm three had arrived before the harvest season had started, and the young female worker in this group had removed shoots using a knife.</p> <p><u>Source:</u> Documentation, interviews & observation</p>
Company Action Plan	
Activity	In the declarations made by local authorities before the harvest, the minimum working age is 15. Ages between 15 and 18 are not considered, and young workers are not discriminated against. In meetings with local authorities, efforts will be made to clarify working age and conditions.
Output indicators (targeted results)	Determining the working conditions of young workers and raising awareness
Timeline and Deadline Date	November 2023 September 2024
Input (budget/resources)	Human Resources
Responsible staff (title/department)	Mehmet Esat İSMAİL [Sustainability coordinator/ Sustainability] Zeynep KILIÇ [Agricultural engineer/ Sustainability]

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	
	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 Compliance	
	HSE.6.2 (PR)	Not initiated	
	HSE.16.3 (PR)	In Compliance	All farms
Personal Protective Equipment	HSE.7 (PR)	In progress	
	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	In Compliance	
	HSE.12.2 (PR)	Not Applicable	
Infrastructure	HSE.13 (PR)	Not Applicable	
	HSE.17.1	Noncompliance	Farm 2
	HSE.17.2 (PR)	In progress	
	HSE.19 (PR)	In progress	
	HSE.21 (PR)	In progress	
	HSE.22 (PR)	Not initiated	2,3,6,7,9,10,11,12,15
Machinery Safety	HSE.14.1	In Compliance	

	HSE.14.2	In Compliance	
	HSE.14.3	In Compliance	
	HSE.14.4	In Compliance	
Ergonomics and Medical Facilities	HSE.15.2 (PR)	Not initiated	
	HSE.16.2	Risk of Noncompliance	All farms

Health Safety and Environment Assessment Summary

Notable Good Practices

Yavuz is implementing a project where they help farmers renovate or improve the quality of workers' accommodation. The Company has supported a village (Resuller) in converting an old school into workers' housing. 50-60 individuals can stay in this house at one time (80 individuals stayed in the house in 2023 as different groups used it). Monitors visited this house, which was in good condition with the necessary utilities. They are planning to expand this project in the future.

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	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. <u>Source:</u> Documentation, interviews & observation
Company Action Plan	
Activity	Please see the relevant article above.
Output indicators (targeted results)	Please see the relevant article above.
Timeline and Deadline Date	November 2023 September 2024
Input (budget/resources)	Human Resources
Responsible staff (title/department)	Mehmet Esat İSMAİL [Sustainability coordinator/ Sustainability] Zeynep KILIÇ [Agricultural engineer/ Sustainability]

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	None of the farms have emergency or evacuation procedures. 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

	<p>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	In this context, training will be provided to at least 500 FLA producers, 30 agricultural intermediaries, and 900 workers in the 2023-2024 season.
Output indicators (targeted results)	It is aimed at teaching what to do in emergencies.
Timeline and Deadline Date	November 2023 September 2024
Input (budget/resources)	Human Resources
Responsible staff (title/department)	Mehmet Esat İSMAİL [Sustainability coordinator/ Sustainability] Zeynep KILIÇ [Agricultural engineer/ Sustainability]

Infrastructure	
Benchmarks	Compliance Status
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 farm 2
Findings/Noncompliance Explanation	<p>At the farm, eight workers reported that two were taken to the hospital. Their symptoms showed that the drinking water caused their sickness.</p> <p><u>Source:</u> Documentation, interviews & observation</p>
Company Action Plan	
Activity	Since Sakarya is a metropolitan city, the municipality provides drinking water in our work areas. There is no clear evidence that their diseases are caused by drinking water. In this context, 500 FLA producers will be informed.
Output indicators (targeted results)	Providing safe drinking water
Timeline and Deadline Date	November 2023 September 2024
Input (budget/resources)	Human Resources
Responsible staff (title/department)	Mehmet Esat İSMAİL [Sustainability coordinator/ Sustainability] Zeynep KILIÇ [Agricultural engineer/ Sustainability]

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 are able to utilize local service providers in case of medical emergencies and have the local medical officer's contact address available to the workers. In the case of a medical emergency, e.g., injury or sudden illness, growers will not unreasonably delay allowing a worker access to medical treatment.	Risk of Noncompliance in all farms

Findings/Noncompliance Explanation	No person was identified as responsible for any health incident. When asked, it is assumed that the farmer himself would take the ill person to the medical facilities by his/her own 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	Since the hazelnut harvest is in field status, workers work for a short time. For this reason, it isn't easy to have a procedure and plan. As the Yavuz Gıda sustainability team, we distribute first aid materials to all our producers and workers. Distribution will continue in the 2023-2024 hazelnut season. In this context, 500 FLA producers, Training will be provided to 30 agricultural intermediaries and 900 workers.
Output indicators (targeted results)	Knowing the rules to be followed in case of emergency
Timeline and Deadline Date	November 2023 September 2024
Input (budget/resources)	Human Resources
Responsible staff (title/department)	Mehmet Esat İSMAİL [Sustainability coordinator/ Sustainability] Zeynep KILIÇ [Agricultural engineer/ Sustainability]

Hours of Work

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HOW.1.1	Noncompliance	1,2,3,4,5,7,8,9,10,11,12,13,14,15
	HOW.1.2	Noncompliance	1,2,3,4,5,7,8,9,10,11,12,13,14,15
	HOW.1.3	Noncompliance	1,2,3,4,5,7,8,9,10,11,12,13,14,15
	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	All farms
	HOW.4.2 (PR)	Not initiated	All farms
	HOW.4.3	Noncompliance	All farms
Overtime	HOW.5.1	Noncompliance	1,2,3,4,5,7,8,9,10,11,12,13,14,15
	HOW.5.2 (PR)	Not initiated	All farms
	HOW.6.1	Noncompliance	1,2,3,4,5,7,8,9,10,11,12,13,14,15
	HOW.6.2	Noncompliance	All farms
	HOW.6.3 (PR)	Not initiated	
	HOW.7	Not Applicable	
Public Holidays and Leave	HOW.8.1	Noncompliance	All farms
	HOW.8.2	Noncompliance	All farms
	HOW.8.3	Not Applicable	
	HOW.9	Not Applicable	
	HOW.10.1	Not Applicable	
	HOW.11 (PR)	Not Applicable	
	HOW.12.1 (PR)	Not initiated	
	HOW.12.2 (PR)	In Compliance	
HOW.13	In Compliance		

	HOW.14	In Compliance	
	HOW.15 (PR)	Not initiated	
	HOW.16 (PR)	Not initiated	

Hours of Work Assessment Summary

General Compliance	
Benchmarks	Compliance Status
<p>HOW.1.1: Employers shall comply with all national laws, regulations and procedures concerning hours of work, public holidays and leave.</p> <p>HOW.1.2: In countries where local law does not set out hours of work specific to the agriculture sector, the participating Company shall consult with local stakeholders representing the employers (farmers), workers, and civil society to define the hours of work. As a general principle, the total hours of work: (1) shall not exceed the number of work hours freely (individually and/or collectively) agreed upon by workers, including that all overtime work is consensual; (2) shall not adversely affect workers' physical and mental health; (3) shall allow for adequate breaks and rest periods during a working day, as determined by the workers, including at least 24 consecutive hours of rest in every seven days; and (4) shall be fully compensated according to legal requirements or worker agreements, whichever is more favorable to workers.</p> <p>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 farms 1,2,3,4,5,7,8,9,10,11,12,13,14,15</p>
<p>Findings/Noncompliance Explanation</p> <p>Monitors verified that neither farmers nor workers know the national laws and regulations concerning hours of work, public holidays, and leave.</p> <p>The monitors verified through interviews with farmers and workers that working hours were as follows:</p> <p>07:00-18:00 for seven migrant worker groups (1,2,3,4,7,12,14)</p> <p>07:00-19:00 for three migrant worker groups (5,9,11)</p> <p>07:00-18:30 for four migrant worker groups (8,10,13,15)</p> <p>08:00-18:30 for the local worker group (6).</p> <p>The break times were approximately 2 hours, with 1 hour for lunch and two 30-minute tea breaks. This makes daily working hours between 9 and 10 hours for seasonal migrant worker groups and 8,5 hours for the local worker group. This will make weekly working hours between 63 and 70 hours (considering that they work without a rest day) for seasonal migrant worker groups, which is above the legal requirements of a maximum weekly standard working time of 45 hours as overtime is unpaid.</p> <p><u>Source:</u> Documentation, interviews & observation</p>	
Company Action Plan	
<p>Activity</p> <p>In their statements, local authorities state that, according to customs and traditions, working hours are between 07:00 and 19:00. Therefore, there are fluctuations in working hours. This will be expressed in discussions and meetings with local authorities regarding working hours.</p>	
<p>Output indicators (targeted results)</p> <p>It is aimed to raise awareness about working hours by local authorities.</p>	
<p>Timeline and Deadline Date</p> <p>November 2023 September 2024</p>	
<p>Input (budget/resources)</p> <p>Human Resources</p>	

Responsible staff (title/department)	Mehmet Esat İSMAİL (Sustainability coordinator/ Sustainability) Zeynep KILIÇ (Agricultural engineer/ Sustainability)
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Protected Workers (pregnant or nursing women, young workers)	
Benchmarks	Compliance Status
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. 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.	Noncompliance in all farms
Findings/Noncompliance Explanation	The legal requirement is that working hours for pregnant and nursing workers be 7,5 hours daily and 8 hours for young workers. However, assessors detected young workers working the same hours, between 9 and 10 hours a day, like any other adult worker. No regulation has been implemented for protected and disadvantaged workers. <u>Source:</u> Documentation, interviews & observation
Company Action Plan	
Activity	Please see 1.1 and 1.2 (activity) in the general compatibility section.
Output indicators (targeted results)	Please see 1.1 and 1.2 (output indicators) in the general compatibility section.
Timeline and Deadline Date	November 2023 September 2024
Input (budget/resources)	Human Resources
Responsible staff (title/department)	Mehmet Esat İSMAİL (Sustainability coordinator/ Sustainability) Zeynep KILIÇ (Agricultural engineer/ Sustainability)

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 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.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.	Noncompliance in farms 1,2,3,4,5,7,8,9,10, 11,12,13,14,15
HOW.6.2: All overtime work shall be voluntary.	Noncompliance in all farms
Findings/Noncompliance Explanation	All the worker groups worked more than the legal normal number of hours per week (45 hours), between 63 and 70 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. There is no awareness of working and overtime hours among farmers and workers. The interviewed workers stated that the working hours are long. <u>Source:</u> Documentation, interviews & observation

Company Action Plan	
Activity	Please see 1.1 and 1.2 (activity) in the general compatibility section
Output indicators (targeted results)	Please see 1.1 and 1.2 (output indicators) in the general compatibility section.
Timeline and Deadline Date	November 2023 September 2024
Input (budget/resources)	Human Resources
Responsible staff (title/department)	Mehmet Esat İSMAİL (Sustainability coordinator/ Sustainability) Zeynep KILIÇ (Agricultural engineer/ Sustainability)

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 refused.	Noncompliance in all farms
Findings/Noncompliance Explanation	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. Since no permanent or long-term work is applicable in the hazelnut harvest employment, annual leave is not applicable. <u>Source:</u> Documentation, interviews & observation
Company Action Plan	
Activity	In this context, at least 500 FLA producers, 30 agricultural intermediaries, and 900 workers will be trained.
Output indicators (targeted results)	Improving working conditions
Timeline and Deadline Date	November 2023 September 2024
Input (budget/resources)	Human Resources
Responsible staff (title/department)	Mehmet Esat İSMAİL (Sustainability coordinator/ Sustainability) Zeynep KILIÇ (Agricultural engineer/ Sustainability)

Compensation

Compliance Status

Section	Benchmark	Compliance status	Farms
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General Compliance	C.1.1	Risk of Noncompliance	1,2,4,5,12
	C.1.2	Risk of Noncompliance	1,2,4,5,12
	C.1.3	Risk of Noncompliance	1,2,4,5,12
	C.1.4	Not Applicable	
Minimum Wage/Fair Compensation	C.2.1	Risk of Noncompliance	1,2,4,5,12
	C.2.2	In Compliance	
	C.2.3	In Compliance	
	C.2.4 (PR)	Not initiated	
	C.2.5 (PR)	In Compliance	
	C.2.6 (PR)	Not initiated	
	C.3	Not Applicable	
Farmer/Producer Income	C.4 (PR)	Not initiated	
Wage Payment and Calculation	C.6	In Compliance	
	C.7.1	In Compliance	
	C.7.2	In Compliance	
	C.7.3 (PR)	Not initiated	
	C.7.4 (PR)	Not initiated	
	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	
	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	1,2,4,5,12
	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	
Fringe Benefits	C.12.1	In Compliance	
	C.12.2 (PR)	Not initiated	
	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. Generally, employers shall follow the minimum wage standards set for other sectors in the same region.</p>	<p>Risk of Noncompliance in farms 1,2,4,5,12</p>
Findings/Noncompliance Explanation	<p>The verifiers found 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</p>

	commission (1,2,4,5,12). This deduction is a prerequisite for finding a job and working that farm since the labor contractor reaches an agreement with the farmer a couple of months before the harvest. Both farmers and workers know the deduction. <u>Source:</u> Documentation, interviews & observation
Company Action Plan	
Activity	At least 500 FLA producers, 30 agricultural intermediaries, and 900 workers will be trained regarding the wage cut.
Output indicators (targeted results)	Preventing wage cuts
Timeline and Deadline Date	November 2023 September 2024
Input (budget/resources)	Human Resources
Responsible staff (title/department)	Mehmet Esat İSMAİL (Sustainability coordinator/ Sustainability) Zeynep KILIÇ (Agricultural engineer/ Sustainability)

Minimum Wage/Fair Compensation	
Benchmarks	Compliance Status
C.2.1: Employers shall pay workers at least the legal minimum wage, the prevailing industry sector wage, or the wage pursuant to Collective Bargaining Agreements that are in force, whichever is higher, for regular working hours (not including overtime). Hourly or daily compensation shall be calculated based on the 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 1,2,4,5,12
Findings/Noncompliance Explanation	<p>The farmers report that they will pay the seasonal workers a minimum wage of 450 TL/day up to 500 TL/day. However, these worker groups do not know how much they will receive because the exact wages are not agreed upon prior to the commencement of work, and the unknown amount is to be deducted as the commission by the labor contractor. The labor contractor can abuse this situation. Therefore, seasonal migrant workers are at risk of being paid below the minimum daily wage.</p> <p>The seasonal migrant worker groups and the farmers reported that farmers would pay these workers' wages 450 TL/day at ten farms (farms 1,2,3,4,5,7,8,9,10,11,13) and 500 TL/day at five farms (farms 3,6,12,14,15). The farmers have hired these workers through labor contractors, who, as a general practice, would pay 10% of the labor contractor's commission from workers' wages paid by the farmers. That will make these workers receive 405 and 450 TL/day. Considering the legal minimum wage is 447,15 TL/day, the wages below this amount are considered below the legal wage.</p> <p>The monitors reported that one local worker group at Farm Six would receive a wage of 500 TL/day with no deductions.</p> <p>Monitors did not detect any financial disciplinary measures.</p> <p><u>Source:</u> Documentation, interviews & observation</p>
Company Action Plan	
Activity	Please see C.1.1 C1.2 C1.3 (activity) in the general compatibility section.

Output indicators (targeted results)	Ensuring fair wages are paid
Timeline and Deadline Date	November 2023 September 2024
Input (budget/resources)	Human Resources
Responsible staff (title/department)	Mehmet Esat İSMAİL (Sustainability coordinator/ Sustainability) Zeynep KILIÇ (Agricultural engineer/ Sustainability)

Wage Payment and Calculation	
Benchmarks	Compliance Status
C.8.1: Employers shall compensate workers for all hours worked. 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. 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.	Noncompliance in all farms
Findings/Noncompliance Explanation	<p>The workers have not been informed about the overtime and overtime rates prior to agreeing to the overtime work. They are also not paid for 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	Please see 15.2.1 (activity) in the management section.
Output indicators (targeted results)	By having seasonal worker contracts signed, the aim is for workers and producers to know the rules.
Timeline and Deadline Date	November 2023 September 2024
Input (budget/resources)	Human Resources
Responsible staff (title/department)	Mehmet Esat İSMAİL (Sustainability coordinator/ Sustainability) Zeynep KILIÇ (Agricultural engineer/ Sustainability)

Workers Awareness	
Benchmarks	Compliance Status
C.11.1: Employers shall make every reasonable effort to ensure workers understand their compensation, including: C.11.1.1: the calculation of wages,	Noncompliance in farms 1,2,4,5,12
C.11.1.5: Employers shall communicate in writing or orally where necessary to all workers all relevant compensation information in the local language or language spoken by the workers, if different from the local language.	Risk of Noncompliance in all farms

Findings/Noncompliance Explanation	Most of the workers are aware of the legal minimum wage for hazelnut harvests. However, monitors noted that not all workers know the exact wage they would receive after intermediary deduction, such as at farms 1, 2, 4, 5, and 12. <u>Source:</u> Documentation, interviews & observation
Company Action Plan	
Activity	At least 500 FLA producers, 30 agricultural intermediaries, and 900 workers will be trained regarding the wage cut.
Output indicators (targeted results)	Ensuring fair wages are paid
Timeline and Deadline Date	November 2023 September 2024
Input (budget/resources)	Human Resources
Responsible staff (title/department)	Mehmet Esat İSMAİL (Sustainability coordinator/ Sustainability) Zeynep KILIÇ (Agricultural engineer/ Sustainability)

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%	93%	0%	100%	100%	100%	
Total number of benchmarks (excl. progressive benchmarks)	48	14	19	19	9	25	16	19	27	196
Farm No. 1	30	7	1	0	3	0	3	11	5	60
Farm No. 2	28	7	1	0	6	0	4	11	5	62
Farm No. 3	23	6	1	0	6	0	3	11	4	54
Farm No. 4	28	7	1	0	6	0	3	11	5	6
Farm No. 5	27	7	1	0	3	0	3	11	5	57
Farm No. 6	22	6	1	0	0	0	3	6	4	42
Farm No. 7	26	7	1	0	3	0	3	11	4	55
Farm No. 8	24	7	1	0	3	0	3	11	4	53
Farm No. 9	23	7	3	0	3	0	3	11	4	54
Farm No. 10	23	7	1	0	3	0	3	11	4	52
Farm No. 11	20	7	1	0	3	0	3	11	4	49
Farm No. 12	23	6	1	0	3	0	3	11	5	52
Farm No. 13	22	7	1	0	3	0	3	11	4	51
Farm No. 14	18	6	1	0	3	0	3	11	4	36
Farm No. 15	22	6	1	0	3	0	3	11	4	50
TOTAL	359	100	17	0	51	0	46	160	65	798
Average % of compliance per code element	50.14%	52.38%	94.04%	100.00%	62.22%	100.00%	80.83%	43.86%	83.95%	72.86%