



## Independent External Monitoring Agriculture Report, 2024

The Fair Labor Association (FLA) conducts an Independent External Monitoring (IEM) assessment when a company has begun implementation of its internal monitoring and remediation program. An IEM allows the assessment of labor conditions at the farm level and first-level processing if they overlap 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](#).

<b>Company</b>	<a href="#">ofi</a>
<b>Country</b>	Türkiye
<b>Crop</b>	Hazelnut
<b>Production process</b>	Harvest
<b>Assessment location</b>	Sakarya & Duzce
<b>Monitor</b>	CSR and Sustainability Services Pty Ltd (Ozgur Tulumbaci
<b>Assessment dates</b>	August 27-29, 2024
<b>Number of assessed farms</b>	15
<b>Total area covered</b>	113.5 ha
<b>Number of farmers interviewed</b>	15
<b>Total number of workers</b>	217
<b>Number of workers interviewed</b>	102

## Employment Relationship

### Compliance Status

Section	Benchmark	Compliance status	Farms
Human Resource Management System	ER.1.1	Noncompliance	2,4,5,7,8,9,10,14
	ER.2.1 (PR)	In progress	
	ER.2.1.1 (PR)	In progress	
Recruitment and Hiring	ER.3.1	Noncompliance	3.14
	ER.3.1.1	Noncompliance	3.14
	ER.3.1.2	Noncompliance	3.14
	ER.4	Noncompliance	6
	ER.5.1	Noncompliance	6
	ER.5.2	Noncompliance	6
	ER.5.3	In Compliance	
	ER.6 (PR)	In progress	
	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	2.6
	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	
	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	Risk of Noncompliance	All farms
	ER.13.1	Risk of Noncompliance	All farms
	ER.13.2 (PR)	In progress	
	ER.13.3 (PR)	In progress	
Administration	ER.15.1	In Compliance	
	ER.15.2	In Compliance	
	ER.15.2.1	Risk of Noncompliance	2,5,8,9,10,11,12,13
	ER.16.1	In Compliance	
	ER.16.2	In Compliance	
	ER.17.2 (PR)	In progress	

	ER.17.3 (PR)	In progress	
	ER.17.4 (PR)	In progress	
Worker Involvement	ER.18.1	In Compliance	
	ER.18.2 (PR)	In progress	
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)	In Progress	
	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)	In Progress	
	ER.20.11	Noncompliance	All farms
Access to Training for Family Members	ER.21	Risk of Noncompliance	All farms
HSE Management System	ER.24.1.	Risk of Noncompliance	All farms
	ER.24.2 (PR)	In progress	
	ER.24.3	Risk of Noncompliance	All farms
	ER.24.4.1 (PR)	In progress	
	ER.24.4.2 (PR)	In progress	
	ER.24.4.3 (PR)	Not initiated	
	ER.24.4.4 (PR)	Not initiated	
	ER.24.4.5 (PR)	Not initiated	
	ER.24.4.6 (PR)	Not initiated	
	ER.24.5 (PR)	In progress	
Grievance Procedures	ER.25.1 (PR)	In progress	
	ER.25.2 (PR)	In progress	
	ER.25.3	In Compliance	
	ER.25.4	In Compliance	

## Employment Relationship Assessment Summary

### Notable Good Practices

Monitors observed that the company has provided trainings both during the harvest period and in the workers' provinces of origin, making notable efforts to encourage workers and farmers to sign written contracts to ensure compliance within its supply chain at the farm level. Although these written contracts are not clearly formulated, detailed, or properly implemented between parties, and overall awareness remains low, it is encouraging to see the initiation of written contracts and the beginning of efforts to increase farmers' awareness and habit of compliance. Monitors observed that, overall, contract awareness has increased compared to previous years. This is a positive development.

Within the scope of the origin studies (the Harvesting the Future Project), hazelnut-producing companies provided training to workers during the summer harvest period in their provinces (southeastern region). Agricultural business intermediaries were interviewed and included in the trainings as well.

Human Resource Management System	
Benchmarks	Compliance Status
<b>ER.1.1:</b> 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 clearly communicate them to workers.	<b>Noncompliance on farms 2,4,5,7,8,9,10, and 14</b>
<b>Findings/Noncompliance Explanation</b>	<p>The company strives to get workers and farmers to enter into contracts. The contract has been signed at some farms; there is a physical contract, but the parties have limited knowledge of the content of the contract. The workers and farmers reporting signing a contract knew that they had signed a document but didn't remember the content of the contract they had signed.</p> <p>Monitors reported that eight out of 15 interviewed farmers (farms 1, 2, 3, 6, 11, 12, 13, and 15) have signed a written contract with workers. All other workers were verbally informed about working conditions, such as tasks, working hours, payment, and wages. On farm two, the farmer and the workers didn't have any information about wages.</p> <p>It is observed that especially female workers had the least information/awareness about the wages among the group members.</p> <p><u>Source:</u> Documentation, interviews, and observation</p>
<b>Company Action Plan</b>	
<b>Activity</b>	of farmer trainings will include: the signing of the seasonal agricultural work contract between farmers, workers and labor contractors on job descriptions; contract signing; and the right and responsibilities of these stakeholders. These trainings will be increased to reach more parties (especially the workers). Various studies will be carried out to ensure that the content of the contracts is adopted by workers, farmers and agricultural intermediaries. The first of these is to expand the scope of the training activities carried out with the Turkish Employment Agency. These trainings were aimed at farmers. This year, the trainings will also be carried out with seasonal migrant workers. At the same time, during the trainings, copies of the contracts will be distributed to the parties and explanations will be made by reading the articles one by one. Thus, all parties will be informed about working hours, wages, etc. and their business relations will be recorded.
<b>Output indicators (targeted results)</b>	Raising awareness on wages, working conditions and Seasonal Agricultural Work Contracts.
<b>Timeline and Deadline Date</b>	September 2025
<b>Input (budget/resources)</b>	of personnel (eg. social workers and an agricultural engineer)
<b>Responsible staff (title/department)</b>	Mustafa DENİZ (sustainability operations coordinator)
Recruitment and Hiring	
Benchmarks	Compliance Status
	<b>Noncompliance</b>

<p><b>ER.3.1:</b> 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><b>ER.3.1.1:</b> Employers shall take reasonable measures to ensure such documentation is complete and accurate.</p> <p><b>ER.3.1.2:</b> 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><b>On farms 3 and 14</b></p>
<p><b>ER.4:</b> Employers shall not use employment agencies/labor contractors that rely on any practice that is linked to using false information to recruit workers; restricting workers' freedom of movement; requiring workers to pay recruitment and/or employment fees; withholding from workers a copy of their employment contract in their native language that sets forth the general terms and conditions of engagement and employment; retaining possession or control of workers identification and other documents like passports, identity papers, work permits, and other personal legal documents; punishing workers for terminating employment.</p> <p><b>ER.5.1:</b> No worker hired by an employment agency or a labor contractor shall be compensated below the legal minimum wage. The same rights as provided for directly hired contract workers apply for workers hired via an employment agency or labor intermediary.</p> <p><b>ER.5.2:</b> 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><b>On farms 6</b></p>
<p><b>ER.7.6:</b> 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><b>On all farms</b></p>

<p><b>Findings/Noncompliance Explanation</b></p>	<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 by the staff of the company and delivered to the gendarme for security check-up purposes. The farmers base the age verification upon this ID control. This practice makes the ID and age verification more structural for seasonal migrant workers compared to local worker groups, where the age verification or ID check is less common. However, monitors confirmed that the majority of farmers had not adequately verified the age of young workers and properly maintained the employment documentation.</p> <p>Thirteen farmers implemented age verification by checking workers' IDs, whereas the remaining two farmers did not verify workers' ages during recruitment (farms 3 and 14).</p> <p>Monitors reported that six of the seasonal migrant worker groups (3,4,6,7,12, and 14) out of 15 were working through a labor intermediary for hiring seasonal migrant worker groups. These labor intermediaries reported deducting a 10% commission from the daily earnings of the workers.</p> <p>The farmers pay the workers' daily wages to labor intermediaries or supervisors, who then distribute them after deducting their commissions.</p> <p>Although the percentage of brokerage commission is generally known as 10% of the daily wage/worker, during the worker interviews, it was seen that workers at one farm (farm 6) did not know how much money they would receive exactly at the end of the job. At another farm (farm 2), the farmer and the workers didn't have any information about wages.</p>
--	--

	<u>Source:</u> Documentation, interviews, and observation
<b>Company Action Plan</b>	
<b>Activity</b>	ofi attaches importance to legal working age and working conditions on farms in its sustainable supply chain. To this end, it organizes trainings to ensure that farmers, workers and subcontracted workers know their rights and responsibilities regarding legal labor relations (young workers, child workers, workers with special conditions, wages, working hours, etc.). ofi, also distributes farmer handbooks to farmers, where young workers' information can be recorded. "Young worker registration forms" are available for all inspected farmers. In the trainings, ofi will emphasize the necessity of farmers filling out these age verification forms (as employers) as soon as the workers arrive. ofi will check through the social workers during their internal monitoring visits that the forms have been filled out. For other inappropriate findings detected, efforts will be made to adopt the content of the seasonal agricultural work contract as mentioned above, because it includes details such as how much the worker will receive per day, the content of the work, etc.
<b>Output indicators (targeted results)</b>	To raise awareness about working conditions and wages (for farmers, workers and labor contractors)
<b>Timeline and Deadline Date</b>	September 2025
<b>Input (budget/resources)</b>	ofi personnel (eg. social workers and an agricultural engineer)
<b>Responsible staff (title/department)</b>	Mustafa DENİZ (sustainability operations coordinator)

Terms and Conditions	
Benchmarks	Compliance Status
<p><b>ER.9.1:</b> Workers should be made aware of the employment terms under which they are engaged.</p> <p><b>ER.11:</b> Employers shall ensure that all legally mandated requirements for the protection or management of special categories of workers, including migrant, juvenile, contract/contingent/temporary, casual, daily, home workers, pregnant, or disabled workers, are implemented.</p>	<b>Noncompliance on all farms</b>
<p><b>ER.9.2:</b> Employment terms shall be those to which the worker has voluntarily agreed, provided those terms do not fall below:</p> <p><b>ER.9.2.1:</b> provisions of national laws;</p> <p><b>ER.9.2.3:</b> the FLA Workplace Code.</p> <p><b>ER.12.1:</b> Employers shall regularly inform workers about workplace rules, health and safety information, and laws regarding workers' rights with respect to freedom of association, compensation, working hours, and any other legally required information, and the FLA Code through appropriate means, including posted in local language(s) throughout the workplace's common areas or in the surrounding community. In the case of workplaces with informal labor structures, these communication and awareness-raising activities could be done with support from supply chain intermediaries such as cooperatives, organizers, tier-one suppliers, or the participating Company.</p> <p><b>ER.12.1.1:</b> Employers shall inform workers that any form of harassment or abuse in the workplace shall be subject to disciplinary measures.</p>	<b>Risk of noncompliance on all farms</b>

**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.

<p><b>Findings/Noncompliance Explanation</b></p>	<p>On all farms, workers were noted to be aware of the working hours and wages except for 2 farms (farms 2 and 6), where workers were not aware of daily wages.</p> <p>All farmers, in general, had basic knowledge about legal requirements for disadvantaged groups. However, monitors detected young workers working the same hours as adult workers on all farms.</p> <p>Working hours were noticed to be longer compared to the legal requirements at all farms except at one farm (farm 6). The worker groups had two-hour breaks. Total working hours after deduction of these breaks were noticed to be as follows:</p> <ul style="list-style-type: none"> <li>• 7:00-17:00 on farm 6 (8 hours)</li> <li>• 7:00-18:00 on farms 4,7,9,10,11, and 12, and 15 (9 hours)</li> <li>• 7:00-18:30 on farms 1,2,5,8,13, and 14 (9,5 hours)</li> <li>• 7:00-19:00 on farm 3 (10 hours)</li> </ul> <p>Farmers were aware of basic requirements about working hours, health and safety (HSE), child labor, and non-discrimination. However, farmers' awareness of harassment and abuse in the workplace, and the fact that these acts are subject to disciplinary measures, was low. Furthermore, the farmers did not communicate the information they knew to the workers. The company conducted these types of communications and awareness-raising activities for both farmers and workers.</p> <p>Farmers, labor contractors, and supervisors have limited knowledge of local labor law and the FLA Code of Conduct. For example, both farmers and supervisors knew about the legal minimum age for labor. However, they did not know that the legal limit for working hours for young workers was eight hours a day.</p> <p>The assessors observed posters named "The rules to be followed in agricultural areas" at farms and villages. These posters had information regarding pesticide disposal, environment, emergency numbers and social policies, legal working age, discrimination, harassment, freedom of movement, forced labor, compensation, and social rights of the workers. The posters prepared by ofi provided information on the rules to be applied at workplaces without going into details.</p> <p><u>Source:</u> Documentation, interviews, and observation</p>
--	---

**Company Action Plan**

<p><b>Activity</b></p>	<p>ofi comprehensively addresses the issues of neglect, abuse, violence and harassment in its farmer and worker trainings and clearly states these issues in its training materials. The handbook distributed to workers explains in detail the definitions of abuse and harassment, rights in such cases and how the complaint mechanism works.</p> <p>ofi has launched a new project for women in the supply chain. Within the scope of the project, trainings were organized to prevent violence and harassment against women in cooperation with the Ministry of Family and Social Services-Violence Prevention and Monitoring Center and Provincial Police Departments, and new trainings will be provided in the future.</p>
------------------------	--

	In the trainings provided by ofi to workers and farmers, the legal working age and working conditions of young workers are clearly explained. As stated under the heading "Recruitment and Employment," new studies will be carried out for young workers.
<b>Output indicators</b> (targeted results)	Raising awareness about the working conditions of seasonal migrant workers.
<b>Timeline and Deadline</b> <b>Date</b>	September 2025
<b>Input</b> (budget/resources)	ofi personnel (eg. social workers and an agricultural engineer)
<b>Responsible staff</b> (title/department)	Mustafa DENİZ (sustainability operations coordinator)

Administration	
Benchmarks	Compliance Status
<b>ER.15.2.1:</b> 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).	<b>Risk of noncompliance on Farms 2,5,8, 9, 10,11,12, and 13</b>
<b>Findings/Noncompliance Explanation</b>	<p>Workers at eight farms (farms 2,5,8,9,10,11,12, and 13) out of the 15 had received an advance payment to cover some of the transportation costs. Workers reported that transportation expenses increased rapidly due to the current high inflation, foreign currency and cost of living crisis. The workers and farmers are not keeping written records for advance payments. Therefore, both sides are at risk of disagreement in the future.</p> <p>Workers usually receive their wages after the job is completed. When workers need advance payment, this amount is deducted from workers' compensation during payment.</p> <p><u>Source:</u> Documentation, interviews, and observation</p>
<b>Company Action Plan</b>	
<b>Activity</b>	ofi social workers prepared a document on workers' advance requests and advance repayments. ofi's social workers advise seasonal migrant workers, labor contractors, and farmers that they should use an advance request form in cases where advances are used. In addition, ofi added advance request forms to the worker books distributed to seasonal migrant workers during the 2022 crop year harvest. Workers usually receive advances before they come to harvest. The importance of keeping written documents of all forms of payments (including advance payments) will be discussed again in all future trainings by ofi.
<b>Output indicators</b> (targeted results)	Raising awareness about payment and recruitment for workers, farmers and labor contractors
<b>Timeline and Deadline</b> <b>Date</b>	September 2025
<b>Input</b> (budget/resources)	ofi personnel (eg. social workers and an agricultural engineer)
<b>Responsible staff</b> (title/department)	Mustafa DENİZ (sustainability operations coordinator)



Work Rules and Discipline	
<b>Benchmarks</b>	<b>Compliance Status</b>
<p><b>ER.20.1:</b> 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><b>ER.20.2:</b> Any person supervising workers shall be aware of the disciplinary rules and practices.</p> <p><b>ER.20.4:</b> 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><b>ER.20.6:</b> Disciplinary rules and practices shall be clearly communicated to all workers.</p> <p><b>ER.20.7:</b> Workers must be informed when a disciplinary procedure has been initiated against them.</p> <p><b>ER.20.8:</b> Workers have the right to participate and be heard in any disciplinary procedure against them.</p> <p><b>ER.20.11:</b> 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>	<b>Noncompliance on all farms</b>
<p><b>Findings/Noncompliance Explanation</b></p> <p>There are no clearly formulated and defined disciplinary rules or practices at the assessed farms. Despite the fact that ofi distributes handbooks to workers that contain disciplinary rules, monitors verified that they are not used in practice. The farmer and labor intermediaries independently determine the disciplinary actions to be taken and the circumstances under which they apply.</p> <p><u>Source:</u> Documentation, interviews, and observation</p>	
<b>Company Action Plan</b>	
<b>Activity</b>	<p>The notebooks that ofi distributes to the farmers and workers in its supply chain already contain disciplinary procedures which are explained to the farmers and workers by ofi social workers during trainings.</p> <p>ofi social workers will explain this procedure to farmers and workers in trainings. If there are any exceptional conditions in the seasonal agricultural work contract, notice will be made that new clauses pertaining to working conditions and contract termination terms may be inserted with the consent and knowledge of both parties.</p>
<b>Output indicators (targeted results)</b>	To promote the use of the disciplinary rule procedure
<b>Timeline and Deadline Date</b>	September 2025
<b>Input (budget/resources)</b>	ofi personnel (eg. social workers and an agricultural engineer)
<b>Responsible staff (title/department)</b>	Mustafa DENİZ (sustainability operations coordinator)
Access to Training for Family Members	
<b>Benchmarks</b>	<b>Compliance Status</b>

<b>ER.21:</b> 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.		<b>Risk of noncompliance on all farms</b>
<b>Findings/Noncompliance Explanation</b>	<p>The interviewed farmers and workers reported that their family members are invited to trainings. In general, the farmer's family members do not have a habit of attending the training (except the farmer's partners, who help them with farming activities, and the children of farmers who are interested in taking over the job from their parents). However, in recent years, ofi has been working to break this habit and conducted a survey among the women to understand root causes and ways to break it (e.g. conducting the trainings at communal centres where women feel more comfortable, instead of coffee houses that are perceived as "men's spaces").</p> <p><u>Source:</u> Documentation, interviews, and observation</p>	
<b>Company Action Plan</b>		
<b>Activity</b>	<p>ofi has started to organize farmer trainings in village life centers (Köy Yaşam Merkezleri) instead of coffeehouses so that women and children can easily participate. In order to increase the number of participants and attract more attention in certain regions, it organizes joint trainings with District Agriculture Directorates.</p> <p>This year, ofi started to use a message-based program (SMS) so that not only male farmers but also female farmers and children are informed about the trainings and participate. ofi aims to increase the participation of women and children by sending an information message to all farmers a few days before the trainings.</p>	
<b>Output indicators (targeted results)</b>	Increasing the participation of family members of farm workers in organized trainings by encouraging their participation	
<b>Timeline and Deadline Date</b>	September 2025	
<b>Input (budget/resources)</b>	ofi personnel (eg. social workers and an agricultural engineer)	
<b>Responsible staff (title/department)</b>	Mustafa DENİZ (sustainability operations coordinator)	

<b>HSE Management System</b>		
<b>Benchmarks</b>	<b>Compliance Status</b>	
<p><b>ER.24.1:</b> 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.</p> <p><b>ER.24.3:</b> Employers shall have a designated responsible person for HSE issues on the farm. For small farms, this could be the farmer's responsibility directly.</p>	<b>Risk of noncompliance on all farms</b>	
<b>Findings/Noncompliance Explanation</b>	<p>HSE rules are communicated to workers by the ofi staff. The monitors confirmed that communication was carried out among the workers by the employees of the affiliated company. ofi staff cover HSE subjects in a detailed manner; they all have first aid certification and strive to share their knowledge on this topic with them as well.</p> <p>In comparison, farmers are passive in this process and their communication lacks detail. They communicate simple general issues of working conditions to workers before starting work. However, it was observed that this was not in the form of an explanation of HSE topics but in the form of simple warnings such as, "do not slip or do not fall."</p>	

	<u>Source:</u> Documentation, interviews, and observation
<b>Company Action Plan</b>	
<b>Activity</b>	The farmer is directly responsible for the HSE as the farms are small. For this reason, ofi social workers explain the HSE rules in all farmer trainings. ofi has made all of its employees receive first aid certificates so that HSE issues can be explained in detail in the field. In addition, there is a training module that includes all the risk factors that may occur on a farm, in accommodation areas, or during transportation. ofi social workers constantly emphasize what farmers must communicate before workers enter the farm. Detailed trainings on HSE will continue to be given to workers and farmers.
<b>Output indicators (targeted results)</b>	To raise workers' awareness on health, safety and environmental rules on the dangers of farms or living areas
<b>Timeline and Deadline Date</b>	September 2025
<b>Input (budget/resources)</b>	ofi personnel (eg. social workers and an agricultural engineer)
<b>Responsible staff (title/department)</b>	Mustafa DENİZ (sustainability operations coordinator)

## Non-discrimination

### Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	ND. 1	Risk of Noncompliance	All farms
Recruitment and Employment Practices	ND.2.1	Risk of Noncompliance	All farms
	ND.2.3	Risk of Noncompliance	All farms
Compensation Discrimination	ND. 3	In Compliance	
Discrimination in Training and Communication	ND. 4	In Compliance	
Marital or Pregnancy-Related Discrimination	ND.5.1	Risk of Noncompliance	All farms
	ND.5.2	Risk of Noncompliance	All farms
	ND.5.3	Risk of Noncompliance	All farms
	ND.6.1	Risk of Noncompliance	All farms
	ND.6.1.1	Risk of Noncompliance	All farms
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.	Risk of noncompliance on all farms
<b>Findings/Noncompliance Explanation</b>	The farmers do not know any local laws, regulations, or judicial processes related to non-discrimination. They could not respond clearly to what discrimination means. Interviewed farmers said that they would not discriminate against any worker based on religion, language, or race. Still, no one mentioned that age, gender, disability, or pregnancy could be a subject of discrimination.  <u>Source:</u> Interviews and observation
Company Action Plan	
<b>Activity</b>	ofi social workers comprehensively address the issue of discrimination in their trainings for farmers and workers. The training and materials address topics such as the definition of discrimination, the types and effects of discrimination, and violence and harassment. ofi social workers work to help farmers and workers learn about the definition and types of discrimination. ofi will continue trainings to raise awareness.
<b>Output indicators (targeted results)</b>	To make the concept of discrimination known in all its aspects (language, religion, race, age, gender, disability, etc.).
<b>Timeline and Deadline Date</b>	September 2025
<b>Input (budget/resources)</b>	ofi personnel (eg. social workers and an agricultural engineer)
<b>Responsible staff (title/department)</b>	Mustafa DENİZ (sustainability operations coordinator)

Recruitment and Employment Practices	
Benchmarks:	Compliance Status
ND.2.1: Recruitment and employment practices shall be free from any type of discrimination. ND.2.3: If not provided by law, employers must provide protection to workers who allege any type of discrimination in recruitment and employment practices.	Risk of noncompliance on all farms
<b>Findings/Noncompliance Explanation</b>	The farmers and labor contractors have no non-discrimination policy and have limited knowledge or understanding of the concept. They are only aware of religion, language, or race-based discrimination.  The company organizes training for workers and farmers, but none of them recalled non-discrimination as a training topic, despite the fact it is a part of the training module and ofi provides information on it.

	<u>Source:</u> Interviews and observation
<b>Company Action Plan</b>	
<b>Activity</b>	As stated in the “Anti-Discrimination Assessment Summary - ND1,” ofi social workers attach great importance to the issue of discrimination and actively integrate it into their training materials. It is comprehensively addressed in farmer and worker trainings to raise awareness and consciousness about types of discrimination.
<b>Output indicators (targeted results)</b>	To make the concept of discrimination known in all its aspects (language, religion, race, age, gender, disability, etc.).
<b>Timeline and Deadline Date</b>	September 2025
<b>Input (budget/resources)</b>	ofi personnel (eg. social workers and an agricultural engineer)
<b>Responsible staff (title/department)</b>	Mustafa DENİZ (sustainability operations coordinator)

Marital or Pregnancy-Related Discrimination	
Benchmarks	Compliance Status
<p><b>ND.5.1:</b> Employers shall not require pregnancy testing of female workers except as required by legal health and safety provisions. In cases that it is required by law, employers shall not use (the results of) such tests as a condition of hiring or continued employment.</p> <p><b>ND.5.2:</b> Employers shall not threaten female workers with dismissal or any other employment decision that negatively affects their employment status in order to prevent them from getting married or becoming pregnant.</p> <p><b>ND.5.3:</b> Employers shall not, on the basis of a woman’s pregnancy, make any employment decisions that negatively affect a pregnant woman’s employment status, including decisions concerning dismissal, loss of seniority, or deduction of wages.</p> <p><b>ND.6.1:</b> 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><b>ND.6.1.1:</b> 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><b>Risk of noncompliance on all farms</b></p>
<b>Findings/Noncompliance Explanation</b>	<p>Monitors reported that the majority of hazelnut farmers are male, and they are not checking the pregnancy condition of the workers as they perceive it to be an off-limit topic. Also, they also do not know the legal working conditions for pregnant or nursing workers, such as the working hour limits and breaks.</p> <p>Monitors met a pregnant worker during assessments. It was observed that the pregnant worker was not working during the time of the assessment due to her health condition.</p> <p><u>Source:</u> Interviews and observation</p>
<b>Company Action Plan</b>	

<b>Activity</b>	<p>ofi social workers advise farmers to monitor the pregnancy and breastfeeding status of workers who come to work during the harvest season. Both farmer and worker education sessions detail the legal rights of pregnant and breastfeeding workers, such as working hours and breaks. ofi handbooks also include a “Special Case Worker” registration form for these workers.</p> <p>These efforts aim to protect workers’ rights and create a safe and secure work environment. ofi is committed to raising awareness and improving practices in this area and will be providing training on special case workers’ rights and working hours in a pilot region in collaboration with government agencies in the coming period.</p>
<b>Output indicators (targeted results)</b>	To raise awareness about special situations (e.g. pregnancy) that may pose a risk in working relationships.
<b>Timeline and Deadline Date</b>	September 2025
<b>Input (budget/resources)</b>	ofi personnel (eg. social workers and an agricultural engineer)
<b>Responsible staff (title/department)</b>	Mustafa DENİZ (sustainability operations coordinator)

## Harassment or Abuse

### Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	H/A.1.1	Risk of Noncompliance	All farms
	H/A.1.2	In Compliance	
Discipline	H/A.2	In Compliance	
	H/A.3	In Compliance	
	H/A.4	In Compliance	
	H/A.5	In Compliance	
	H/A.6	In Compliance	
	H/A.7	In Compliance	
	H/A.13	In Compliance	
Violence	H/A.8.1	In Compliance	
	H/A.8.2	In Compliance	
	H/A.8.3	In Compliance	
Sexual Harassment	H/A.9.1	In Compliance	
	H/A.9.2	In Compliance	
	H/A.9.3	In Compliance	
	H/A.9.4	In Compliance	
Security Practices	H/A.10	In Compliance	
	H/A.10.1	In Compliance	
	H/A.10.2	In Compliance	

### Harassment or Abuse Assessment Summary

#### Notable Good Practice

Children were trained on harassment and abuse in a summer school with the participation of the local police force staff.

General Compliance	
<b>Benchmarks</b>	<b>Compliance Status</b>
H/A.1.1: Employers shall comply with all national laws, regulations and procedures concerning discipline, violence, harassment or abuse.	<b>Risk of noncompliance on all farms</b>
<b>Findings/Noncompliance Explanation</b>	No cases of verbal or physical abuse were detected or reported. However, awareness about the applicable regulations and penalties was low.  The risk of harassment and abuse is higher in groups where no parents are observing the young workers during work.  <u>Source:</u> Interviews and observation
<b>Company Action Plan</b>	
<b>Activity</b>	of social workers address harassment and abuse in detail during farmer and worker training sessions, explaining the different types of harassment to raise awareness on the issue. Training materials include comprehensive explanations of harassment and abuse, along with their various forms.
<b>Output indicators (targeted results)</b>	To raise awareness of applicable regulations, procedures and penalties
<b>Timeline and Deadline Date</b>	September 2025
<b>Input (budget/resources)</b>	of personnel (eg. social workers and an agricultural engineer)
<b>Responsible staff (title/department)</b>	Mustafa DENİZ (sustainability operations coordinator)

## Child Labor

### Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	CL.1	Noncompliance	1,4
Minimum Age	CL.2	Noncompliance	1,4
Light Work	CL.3	Noncompliance	1,4
Right to Education	CL.4.1 (PR)	In compliance	
Young Workers	CL.5	Noncompliance	6,10,12,14
	CL.6.1	Noncompliance	All farms
	CL.6.2	Noncompliance	All farms
	CL.7	Noncompliance	3,5,6,12
Apprenticeships and Vocational Training	CL.8.1 (PR)	Not Applicable	
	CL.8.2 (PR)	Not Applicable	
Children on Premises	CL.9	In Compliance	
	CL.10.1	In Compliance	

Removal and Rehabilitation of Child Laborers	CL.10.2 (PR)	In progress	
--	--------------	-------------	--

## Child Labor Assessment Summary

### Notable Good Practice

The company launched a summer school project to prevent child labor in its supply chain during 2024 Harvest too. Carried out together with the Ministry of National Education, the summer school provides a safe environment for children of worker families to spend their time instead of being exposed to hazards at orchards.

As an addition to the project, two separate children's books were prepared to cover sustainable development goals. One was about earthquakes, and the second one was about hazelnut farming. A total of 8,000 books were distributed. On April 23, National Sovereignty and Children's Day, the authors of the books were brought together with children in Ordu. The content of the books was communicated to children through play. In one of the summer schools, children were trained on harassment and abuse with the participation of the police department.

General Compliance	
Benchmarks	Compliance Status
<p><b>Cl.1:</b> Employers shall comply with all national laws, ratified international conventions, fundamental labor rights, regulations, and procedures concerning the prohibition of child labor.</p>	<p><b>Noncompliance on farms 1 and 4</b></p>
<p><b>Findings/Noncompliance Explanation</b></p>	<p>Monitors met workers under the age of 15 at two farms (at farm 1, a 13-year-old boy, and farm 4, a 14-year-old boy). These workers were employed together with adult workers, and they were reported to collect hazelnuts from the ground and receive the same daily wage as adult workers.</p> <p><u>Source:</u> Interviews and observation</p>
<p><b>Company Action Plan</b></p>	
<p><b>Activity</b></p>	<p>ofi attaches great importance to combating child labor and carries out comprehensive work on this issue. ofi carries out various concrete initiatives to prevent child labor, including the following:</p> <ul style="list-style-type: none"> <li>• Summer schools: Summer schools are established during the harvest season to provide a safe and educational environment for children.</li> <li>• Education kits: Following worker training, education kits addressing the basic needs of children are distributed.</li> <li>• Safe areas: Areas where children can play and feel safe are created.</li> <li>• Informational materials: Brochures on child labor are prepared and hung in village centers to raise awareness.</li> <li>• Joint training with state institutions: Aware of the critical role of state institutions in combating child labor, ofi is cooperating with the Provincial Police Department to organize a joint training aimed at raising public awareness.</li> </ul> <p>ofi is determined to continue its efforts to combat child labor in the coming periods. It plans to expand the scope of its summer school work, distribute</p>



	more brochures to villages, increase cooperation with government institutions, organize larger-scale training programs, and further raise awareness among farmers.
<b>Output indicators</b> (targeted results)	To prevent children from entering farms and to prepare activities for them to be in safe areas.
<b>Timeline and Deadline</b> <b>Date</b>	September 2025
<b>Input</b> (budget/resources)	ofi personnel (eg. social workers and an agricultural engineer)
<b>Responsible staff</b> (title/department)	Mustafa DENİZ (sustainability operations coordinator)

Minimum Age	
Benchmarks	Compliance Status
<b>CL.2:</b> 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. Suppose a country has a specified minimum age of 14 due to an insufficiently developed economy and educational facilities. In that case, employers might follow national legislation but must work to raise the minimum age to 15 progressively.	<b>Noncompliance on farms 1 and 4</b>
<b>Findings/Noncompliance Explanation</b>	<p>Out of the interviewed workers, two children under the age of 15 were identified.</p> <p>Monitors observed that farmers are highly aware of the legal minimum working age. However, both farmers and workers attributed the cases of child labor to the poor economic conditions of seasonal migrant workers and the constantly increasing costs of living in the country.</p> <p><u>Source:</u> Interviews and observation</p>
<b>Company Action Plan</b>	
<b>Activity</b>	<p>As stated in the “General Compliance CI.1” section, ofi works to prevent child labor through concrete initiatives such as opening summer schools, creating safe spaces for children, preparing informative brochures and organizing joint trainings in collaboration with government institutions to raise awareness among farmers and workers. Furthermore, ofi is aware that one of the main causes of child labor is economic hardship. In order to reduce the impact of this problem, it implements the practices specified in the Terms and Conditions-ER.13.2.</p> <p>ofi is determined to continue its fight against child labor with determination. In this context, it will continue to expand projects such as summer schools, reach more villages to raise awareness, strengthen cooperation with government institutions to organize more comprehensive educational programs, and distribute educational kits. Ensuring a safe and secure future for children is one of the most important priorities in ofi’s ongoing work.</p>
<b>Output indicators</b> (targeted results)	To prevent children from entering farms and to prepare activities for them to be in safe areas
<b>Timeline and Deadline</b> <b>Date</b>	September 2025
<b>Input</b> (budget/resources)	ofi personnel (eg. social workers and an agricultural engineer)

<b>Responsible staff</b> (title/department)	Mustafa DENİZ (sustainability operations coordinator)
--	---

<b>Immediate Family Members</b>	
<b>Benchmarks</b>	<b>Compliance Status</b>
<p><b>CL.3:</b> 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> <p>The work is not dangerous and not harmful to their health or development, and specifically</p> <ul style="list-style-type: none"> <li>• Should not involve the use of or exposure to chemicals;</li> <li>• Should not involve carrying heavy loads (children should not lift loads more than 15% of their body weight at any time);</li> <li>• Should not involve the use of farm equipment, dangerous tools, plows, tractors, machetes, sharp tools, saws, or power engines;</li> <li>• Should not involve working on heights (not more than 6 feet) such as in trees or on ladders, or in confined places such as silos or storage areas, and</li> <li>• Should not involve strenuous work and extreme conditions such as standing or bending for several hours, working in high temperatures, and not having breaks.</li> </ul> <p>The work does not prejudice their attendance at school and is done within reasonable time limits after school or during holidays. Specifically:</p> <ul style="list-style-type: none"> <li>• Working hours should not exceed 14 hours per week;</li> <li>• No work should take place before 6:00 am and after 8:00 pm; and</li> <li>• There should be at least one full day (24 hours) of rest per week.</li> </ul> <p>The work is appropriate to the child's age and physical condition and does not jeopardize the child's social, moral, or physical development.</p> <p>The child's parents provide supervision and guidance and maintain all documents as required by the law.</p> <p>Other criteria specific to in-scope commodities or as defined by the national government in the country that are not lower than the ILO standard on light work.</p>	<p><b>Noncompliance on farms 1 and 4</b></p>
<p><b>Findings/Noncompliance Explanation</b></p> <p>Monitors observed that farmers, working parents, and working children had little understanding of the concept of light work. During the interviews, farmers and workers stated that the children under 15 were engaged in collecting hazelnuts. Monitors observed that collecting hazelnuts from the ground and the branches was the main work activity these children were engaged in.</p> <p><u>Source:</u> Interviews and observation</p>	
<b>Company Action Plan</b>	
<b>Activity</b>	off's social trainings, it covers all the details of child labor. This includes farmer children. In accordance with national laws and ILO Convention 138, the conditions for employing farmer children who are not younger than 12 years old in light work are explained. This subject will be addressed further in farmer trainings.
<b>Output indicators</b> (targeted results)	To prevent children from entering farms and to prepare activities for them to be in safe areas.
<b>Timeline and Deadline Date</b>	September 2025

<b>Input (budget/resources)</b>	ofi personnel (eg. social workers and an agricultural engineer)
<b>Responsible staff (title/department)</b>	Mustafa DENİZ (sustainability operations coordinator)

<b>Young Workers</b>	
<b>Benchmarks</b>	<b>Compliance Status</b>
	<b>Noncompliance</b>
<b>CL.5:</b> Employers shall abide by all relevant rules and procedures where the law requires government permits or permission from parents as a condition of employment of young workers	<b>On farms 6,10,12, and 14</b>
<p><b>CL.6.1:</b> 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><b>CL.6.2:</b> Employers shall maintain a list of all young workers, their entry dates, proof of age, and a description of their assignment.</p> <p><b>CL.7:</b> 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. An adult must supervise every activity performed by a young worker.</p>	<b>On all farms</b>
<b>Findings/Noncompliance Explanation</b>	<p>The monitors verified that neither farmers nor labor intermediaries know the concept of young workers and the applicable legal requirements.</p> <p>Monitors identified a total of 50 young workers between 15 (as the minimum legal working age) and the age of 18. They worked under the same terms and conditions as adults and performed the same work activities on the farms, such as collecting hazelnuts from the ground, picking from branches, bending and shaking trees, and working on steep slopes.</p> <p>Monitors noticed young workers working without their parents at 4 orchards (farms 6, 10, 12, and 14).</p> <p>The monitoring team noted that farmers and labor intermediaries are not implementing measures to comply with laws and regulations on the employment of young workers. They do not keep records of young workers regarding their employment.</p> <p>Young workers at 4 orchards (farms 3, 5, 6, and 12) reported that they worked on removing sprouts before working at harvest. This job was considered dangerous because it involved cutting the newly emerged sprouts at the roots of the hazelnut tree using a cutting tool (knife, chisel, etc). In addition, a 16-year-old young worker was found to be using a construction machine at one orchard (farm 12).</p> <p><u>Source:</u> Interviews and observation</p>
<b>Company Action Plan</b>	
<b>Activity</b>	ofi will explain to farmers and workers in detail and with examples that young workers can only be employed in light work. It will also inform them

	<p>that employing young workers in difficult and demanding conditions can lead to serious psychological and physical problems.</p> <p>This year, farmers (farms 3, 5, 6, 10, 12 and 14) who were found to employ young workers during inspections by inspectors will receive refresher training. In addition, as stated in “Recruitment and Employment 3.1, 3.1.1, and 3.1.2,” social workers will check the “Registration of Young Workers” form in the handbooks distributed to farmers during the harvest season to ensure that accurate and complete records are kept.</p>
<b>Output indicators (targeted results)</b>	To ensure that the necessary documents (the Young Worker Registration Form, Registration of Working Days, e.g.) are filled out and records are kept
<b>Timeline and Deadline Date</b>	September 2025
<b>Input (budget/resources)</b>	of personnel (eg. social workers and an agricultural engineer)
<b>Responsible staff (title/department)</b>	Mustafa DENİZ (sustainability operations coordinator)

## Health, Safety and Environment

### Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HSE.1.	Risk of Noncompliance	All farms
Document Maintenance, Permits, and Certificates	HSE.2 (PR)	In progress	
	HSE.3.1	In Compliance	
	HSE.4 (PR)	In progress	
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)	In progress	
	HSE.16.3 (PR)	In compliance	
Personal Protective Equipment	HSE.7 (PR)	In compliance	
	HSE.8	In Compliance	
Chemical Management	HSE.9.1	In Compliance	
	HSE.9.2	In Compliance	
	HSE.9.2.1	In Compliance	
	HSE.10	In Compliance	
	HSE.11.1	In Compliance	
Protection Reproductive Health	HSE.11.2	In Compliance	
	HSE.12.1	In Compliance	
Infrastructure	HSE.12.2 (PR)	In Compliance	
	HSE.13 (PR)	Not Applicable	
	HSE.17.1	In Compliance	
	HSE.17.2 (PR)	In progress	
	HSE.19 (PR)	In progress	
	HSE.21 (PR)	In progress	
Machinery Safety	HSE.22 (PR)	In progress	1,2
	HSE.14.1	Noncompliance	12

	HSE.14.2	Noncompliance	12
	HSE.14.3	Risk of Noncompliance	12
	HSE.14.4	Risk of Noncompliance	12
Ergonomics and Medical Facilities	HSE.15.2 (PR)	In Compliance	
	HSE.16.2	Risk of Noncompliance	All farms

## Health Safety and Environment Assessment Summary

<p><b>Notable Good Practice</b></p> <p>Mobile vehicles performed health screenings on female workers during the harvest period on-site. In total, female reproductive health training was provided to 1,164 female workers.</p> <p>On March 8, Women's Day, three different trainings were carried out for the local community members: first, a financial literacy training (Ordu), second, a women's health training (Sakarya), and three, a menstrual awareness training (Sakarya). A healthy nutrition training module was integrated into these trainings as well.</p>
---

General Compliance	
<b>Benchmarks</b>	<b>Compliance Status</b>
<b>HSE.1:</b> Employers shall comply with all national laws, regulations, and procedures concerning health, safety, and the environment.	<b>Risk of noncompliance on all farms</b>
<b>Findings/Noncompliance Explanation</b>	<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 worker, an ill worker, or a person with disabilities among the worker group. The farmers do not know about the legal requirements, and there is no procedure related to HSE issues at the farm level.</p> <p><u>Source:</u> Interviews and observation</p>
<b>Company Action Plan</b>	
<b>Activity</b>	Farmers are informed about the procedures and working conditions in farmer trainings. The disciplinary procedure and pregnant and breastfeeding procedure contained in the farmers' notebooks (distributed to the farmers by ofi) contain the necessary information. In order for the farmers to have a good grasp of the contents of these procedures and to make the necessary applications, detailed information on the subject will be given in the trainings and the procedures will continue to be delivered to the farmers.
<b>Output indicators (targeted results)</b>	To ensure that farmers have no knowledge of local regulations on HSE issues and the conditions under which workers (especially protected workers) can work
<b>Timeline and Deadline Date</b>	September 2025
<b>Input (budget/resources)</b>	ofi personnel (eg. social workers and an agricultural engineer)

<b>Responsible staff</b> (title/department)	Mustafa DENİZ (sustainability operations coordinator)
--	---

Evacuation Requirements and Procedure	
<b>Benchmarks</b>	<b>Compliance Status</b>
<b>HSE.5.2:</b> Where appropriate, workers shall be trained in evacuation procedures at least once per year.	<b>Risk of noncompliance on all farms</b>
<b>Findings/Noncompliance Explanation</b>	As some farmers' land is scattered across the region, they stated that it is not possible to have fire fighting equipment on all of the farms. Major reported risks in the area are floods, landslides, and earthquakes. The farmers apply simple measures, such as stopping work when the rain starts and returning to their accommodations when the rain stops. None of the farms have emergency or evacuation procedures.  <u>Source:</u> Interviews and observation
<b>Company Action Plan</b>	
<b>Activity</b>	ofi organized joint trainings with AFAD on emergencies and evacuation procedures. In the future, it will organize trainings on emergencies and evacuation procedures in cooperation with AFAD.
<b>Output indicators</b> (targeted results)	Eliminate non-compliance with evacuation requirements and procedure and ensure readiness for emergencies
<b>Timeline and Deadline Date</b>	September 2025
<b>Input</b> (budget/resources)	ofi personnel (eg. social workers and an agricultural engineer)
<b>Responsible staff</b> (title/department)	Mustafa DENİZ (sustainability operations coordinator)

Machinery Safety	
<b>Benchmarks</b>	<b>Compliance Status</b>
<b>HSE.14.1:</b> All production machinery, equipment, and tools shall be properly guarded and regularly maintained. <b>HSE.14.2:</b> Where appropriate, workers shall receive training in the proper use and safe operation of machinery, tractors, equipment, and tools they use.	<b>Noncompliance on all farms</b>
<b>HSE.14.3:</b> Employers shall ensure safety instructions are either displayed or posted near all machinery or are readily accessible to the workers in language(s) spoken by workers. Where workers are illiterate, the instructions should be depicted by pictograms. <b>HSE.14.4:</b> Workers shall not suffer any negative consequences for refusing to work with machinery, equipment, or tools that are not properly guarded or reasonably considered unsafe.	<b>Risk of noncompliance on all farms</b>
<b>Findings/Noncompliance Explanation</b>	Workers are only responsible for harvesting. Only one 16-year-old worker was detected operating machinery (farm 12).  <u>Source:</u> Interviews and observation
<b>Company Action Plan</b>	

<b>Activity</b>	As stated in the heading “Young Workers CL.7,” ofi explains to farmers and workers in detail and with examples that young workers should only be employed in light work. It also emphasizes that employing young workers in difficult and harsh conditions can lead to serious psychological and physical problems. After the detection of the use of machinery, ofi organized a refresher training on occupational health and safety with farmers and workers.
<b>Output indicators (targeted results)</b>	Prevent hazards to young workers arising from the use of machinery
<b>Timeline and Deadline Date</b>	September 2025
<b>Input (budget/resources)</b>	ofi personnel (eg. social workers and an agricultural engineer)
<b>Responsible staff (title/department)</b>	Mustafa DENİZ (sustainability operations coordinator)

Ergonomics and Medical Facilities	
Benchmarks	Compliance Status
<b>HSE.16.2:</b> Medical facilities shall be established and maintained as required by applicable laws. If there is 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 to them. In the case of a medical emergency, e.g., injury or sudden illness, growers will not unreasonably delay allowing a worker to have access to medical treatment.	<b>Risk of noncompliance on all farms</b>
<b>Findings/Noncompliance Explanation</b>	No responsible person has been identified for any possible health case or accident. There is no professional emergency plan to access the medical facilities; the farmers report that they will take the worker to the hospital themselves or call an ambulance.  <u>Source:</u> Interviews and observation
<b>Company Action Plan</b>	
<b>Activity</b>	ofi social workers provide training to farmers and workers on what to do in emergencies and direct them to the nearest health institutions. After the training, first aid kits are distributed to farmers and workers. In addition, the handbook given to workers clearly states the contact numbers to be called in emergencies. ofi plans to continue these activities in the future.
<b>Output indicators (targeted results)</b>	To raise awareness of workers on health, safety and environmental rules against dangers in farms or living areas
<b>Timeline and Deadline Date</b>	September 2025
<b>Input (budget/resources)</b>	ofi personnel (eg. social workers and an agricultural engineer)
<b>Responsible staff (title/department)</b>	Mustafa DENİZ (sustainability operations coordinator)

## Hours of Work

### Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HOW.1.1	Noncompliance	All farms
	HOW.1.2	Noncompliance	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	Noncompliance	12
Meal and Rest Breaks	HOW.3	In Compliance	
Protected Workers	HOW.4.1	Noncompliance	All farms (except farm 6)
	HOW.4.2 (PR)	In progress	
	HOW.4.3	Noncompliance	All farms (except farm 6)
Overtime	HOW.5.1	Noncompliance	All farms
	HOW.5.2 (PR)	Not initiated	
	HOW.6.1	Noncompliance	All farms
	HOW.6.2	Noncompliance	All farms
	HOW.6.3 (PR)	Not initiated	
	HOW.7	Noncompliance	All farms
Public Holidays and Leave	HOW.8.1	Not Applicable	
	HOW.8.2	Not Applicable	
	HOW.8.3	Not Applicable	
	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 Applicable	
	HOW.13	Not Applicable	
	HOW.14	Not Applicable	
	HOW.15 (PR)	Not Applicable	
	HOW.16 (PR)	Not Applicable	

### Hours of Work Assessment Summary

General Compliance	
Benchmarks	Compliance Status
	Noncompliance
<b>HOW.1.1:</b> Employers shall comply with all national laws, regulations and procedures concerning hours of work, public holidays and leave.	On all farms
<b>HOW.1.2:</b> 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	On all farms except farm 6



according to legal requirements or worker agreements, whichever is more favorable to workers.

**HOW.1.3:** Other than in exceptional circumstances or during short-term seasonal work as described under HOW.2, the total weekly work hours (regular work hours plus overtime) shall not exceed 60 hours per week or the legal limit, whichever is lower. The upper limit during a working day shall not exceed 12 hours.

<b>Findings/Noncompliance Explanation</b>	<p>Neither farmers nor employees are aware of the national laws, regulations, and procedures concerning hours of work, public holidays, and leave on assessed orchards.</p> <p>All farmers, in general, had basic knowledge about legal requirements for disadvantaged groups; however, monitors detected young workers working the same hours as adult workers on all farms.</p> <p>Working hours are longer compared to the legal requirements at all farms except for one farm (farm 6). The worker groups had two-hour breaks. Working hours after the deduction of breaks were as follows:</p> <ul style="list-style-type: none"> <li>• 7:00-17:00 on farm 6 (8 hours)</li> <li>• 7:00-18:00 on farms 4, 7, 9, 10, 11, 12, and 15 (9 hours)</li> <li>• 7:00-18:30 on farms 1, 2, 5, 8, 13, and 14 (9,5 hours)</li> <li>• 7:00-19:00 on farm 3 (10 hours)</li> </ul> <p>Three groups of workers reported they work more than 18 days without rest days unless the weather is rainy (farms 4, 5, and 12). If the weather is rainy, the workers are granted an unpaid rest day.</p> <p><u>Source:</u> Interviews and observation</p>
---	--

**Company Action Plan**

<b>Activity</b>	<p>Information on the working hours of seasonal migrant workers is provided to farmers and workers by ofi social workers. Although farmers are informed about the issue, they do not comply with the legal working hours because they want the hazelnuts to be collected as soon as possible. The sanctions of public institutions are important in this regard. For this reason, ofi will hold meetings with district governorships throughout the year to discuss the work that can be done to monitor and implement the legal periods regarding working hours. In addition, the legal information trainings (initiated by the Turkish Employment Agency provincial directorates in the regions) will continue; these trainings cover working conditions for farmers and the legal sanctions to be applied in case of detection of illegal cases.</p>
<b>Output indicators (targeted results)</b>	Improving working conditions and ensuring the implementation of legal working hours
<b>Timeline and Deadline Date</b>	September 2025
<b>Input (budget/resources)</b>	ofi personnel (eg. social workers and an agricultural engineer)
<b>Responsible staff (title/department)</b>	Mustafa DENİZ (sustainability operations coordinator)

<b>Protected Workers (pregnant or nursing women, young workers)</b>	
<b>Benchmarks</b>	<b>Compliance Status</b>

<p><b>HOW.4.1:</b> 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><b>HOW.4.3:</b> 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>		<b>Noncompliance on all farms except farm 6</b>
<b>Findings/Noncompliance Explanation</b>	<p>According to the legal requirement, pregnant and nursing workers work 7.5 hours daily and young workers work eight hours. However, assessors detected that young workers work the same working hours (more than eight hours a day) as any other adult worker. Overall, no regulation has been implemented for protected and disadvantaged workers.</p> <p><u>Source:</u> Interviews and observation</p>	
<b>Company Action Plan</b>		
<b>Activity</b>	<p>ofi has prepared a work guide outlining legal restrictions for young workers and pregnant/breastfeeding women and detailed in training that daily working hours should be limited to eight hours and 7.5 hours for pregnant/breastfeeding women. ofi distributes brochures and handbooks on working hours and provides training. The notebooks contain working conditions, emergency numbers, registration forms for workers in special situations (pregnant, breastfeeding and disabled workers or unemployed children at home) and a calendar to track working days.</p>	
<b>Output indicators (targeted results)</b>	<p>Working conditions for young, pregnant, and nursing workers will be clear and protected.</p>	
<b>Timeline and Deadline Date</b>	<p>September 2025</p>	
<b>Input (budget/resources)</b>	<p>ofi personnel (eg. social workers and an agricultural engineer)</p>	
<b>Responsible staff (title/department)</b>	<p>Mustafa DENİZ (sustainability operations coordinator)</p>	

Overtime	
Benchmarks	Compliance Status
<p><b>HOW.5.1:</b> 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 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><b>HOW.6.1:</b> 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><b>HOW.6.2:</b> All overtime work shall be voluntary.</p> <p><b>HOW.7:</b> Employers shall be able to provide an explanation for all periods when the exceptional circumstances exception has been used. Clear communication and consultation will be held with workers, and any extended hours of work will be levied upon obtaining (verbal / written) consensus from them.</p>	<b>Noncompliance on all farms</b>

<b>Findings/Noncompliance Explanation</b>	<p>Long working hours is one of the top complaints of the workers in the hazelnut harvest. All of the worker groups worked more than 45 legal normal working hours per week. These workers are not paid for any overtime hours above the legal regular working hours. The farmers and workers verbally agreed on total days of work against the agreed daily wage without calculating a premium for any overtime hours. The workers had to accept this deal in order to work on the farm.</p> <p>There is no awareness of working hours and overtime hours among farmers and workers.</p> <p><u>Source:</u> Interviews and observation</p>
<b>Company Action Plan</b>	
<b>Activity</b>	As stated in the heading, "General Compliance How.1.1, How.1.2, and How1.3," ofi will hold meetings with district governorships throughout the year to discuss work that can be done to monitor and implement legal periods regarding working hours. In the good social practice trainings given by Social Service Specialists in cooperation with the Turkish Employment Agency (İŞKUR), it is explained to farmers and workers that legal working hours should not exceed 45 hours.
<b>Output indicators (targeted results)</b>	Improving working conditions and ensuring the implementation of legal working hours
<b>Timeline and Deadline Date</b>	September 2025
<b>Input (budget/resources)</b>	ofi personnel (eg. social workers and an agricultural engineer)
<b>Responsible staff (title/department)</b>	Mustafa DENİZ (sustainability operations coordinator)

## Compensation

### Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	C.1.1	Risk of Noncompliance	All farms
	C.1.2	Risk of Noncompliance	3,4,6,7,12,14
	C.1.3	Noncompliance	2
	C.1.4	In progress	
Minimum Wage/Fair Compensation	C.2.1	Noncompliance	2
	C.2.2	Noncompliance	2
	C.2.3	In Compliance	
	C.2.4 (PR)	In compliance	
	C.2.5 (PR)	In compliance	
	C.2.6 (PR)	In compliance	
	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	Noncompliance	All farms
	C.8.1	Noncompliance	All farms
	C.8.2	Noncompliance	All farms
	C.8.3	Noncompliance	All farms
	C.8.4 (PR)	Not initiated	
	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	In Compliance	
	C.11.1.2	Not Applicable	
	C.11.1.3	In Compliance	
	C.11.1.4	Not Applicable	
	C.11.1.5	Noncompliance	2
	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
	Risk of noncompliance
<b>C.1.1:</b> Employers shall comply with all national laws, Collective Bargaining Agreements in force, regulations, and procedures concerning the payment of compensation to workers.	On all farms
<b>C.1.2:</b> 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.	On farms 3, 4, 6, 7, 12, and 14
<b>C.1.3:</b> In countries where local law does not specify compensation specific to the agriculture sector, the participating Company shall consult with local stakeholders representing the employers (farmers), workers, local government and commissions, and civil society to define the appropriate wage level. As a general principle, employers shall follow the minimum wage standards set for other sectors in the same region.	Noncompliance on farm 2
<b>Findings/Noncompliance Explanation</b>	<p>The monitors found the farmers were aware of the minimum legal wage during the 2024 harvest.</p> <p>The practice of deductions in the wages of seasonal migrant workers persisted in 2024 too. These workers are recruited through a labor contractor who deducts about 10% of their wages in exchange for his service (farms 3, 4, 6, 7, 12, and 14 ). This deduction is a prerequisite for</p>

	<p>finding a job and working at the farm since the labor contractor reaches an agreement with the farmer a couple of months prior to the harvest. The deduction amount was unknown by workers at one farm (farm 6). At one farm (farm 2), the farmer and the workers had no information yet about the wages that would be paid.</p> <p><u>Source:</u> Interviews and observation</p>
<b>Company Action Plan</b>	
<b>Activity</b>	<p>ofi as mentioned in the “Human Resource Management System-ER.1.1,” ofi provides trainings for both farmers and labor contractors throughout the year. In these trainings, ofi emphasizes that labor contractors are forbidden from decucting commissions from the workers, and that the labor contractors must receive the brokerage fee from the farmer. Throughout the year, ofi’s social workers constantly remind farmers and labor contractors of this during their consultations. However, after some workers expressed that they were unaware of the wages they would receive, additional training sessions were organized following inspections.</p>
<b>Output indicators (targeted results)</b>	Preventing workers from receiving wages below the daily minimum wage
<b>Timeline and Deadline Date</b>	September 2025
<b>Input (budget/resources)</b>	ofi personnel (eg. social workers and an agricultural engineer)
<b>Responsible staff (title/department)</b>	Mustafa DENİZ (sustainability operations coordinator)

Minimum Wage/Fair Compensation	
Benchmarks	Compliance Status
<p><b>C.2.1:</b> 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. The employer should also inform workers about the legal minimum wage applicable to them.</p> <p><b>C.2.2:</b> Employers shall provide all legally required benefits to all workers.</p>	<p><b>Noncompliance on farm 2</b></p>
<b>Findings/Noncompliance Explanation</b>	<p>Monitors reported that 6 of the seasonal migrant worker groups (3, 4, 6, 7, 12, and 14) out of 15 were working through a labor intermediary for hiring seasonal migrant worker groups. These labor intermediaries were reportedly deducting a 10% commission from the daily earnings of the workers.</p> <p>Although the brokerage commission is generally known as 10%, during the worker interviews, it was obvious that workers at one farm (farm 6) did not know how much money they would receive precisely at the end of the job. At another farm (farm 2), the farmer and the workers had no information about wages yet.</p> <p>One farm's workers (farm 7) were reported to receive 760 TL/day after the deduction of the labor intermediary's commission. This was noticed as the lowest daily wage among the 15 farms. Other than this, daily wages were 800 TL/day or more. The local commissions had announced 800 TL/day as</p>

	<p>the recommended minimum wage. The national gross daily minimum wage for 2024 was announced as 666.75 TL.</p> <p>The farmers pay the workers' daily wages to labor intermediaries or supervisors, who then distribute them after deducting their commission.</p> <p><u>Source:</u> Interviews and observation</p>
<b>Company Action Plan</b>	
<b>Activity</b>	<p>The main reason that workers' wages to fall below the minimum wage is deductions from labor contractors. ofi's target group to inform is therefore labor contractors and farmers. During farmer trainings, ofi tells them they must pay at least the minimum wage determined by the Governorships to all agricultural workers, regardless of whether the workers are seasonal or local. However, ofi cannot interfere with the wage agreed upon between the workers and the farmers, except for the requirement to meet the minimum wage.</p> <p>In farmer trainings, ofi will emphasize that all agricultural workers, regardless of whether they are local or seasonal, should be paid at least the minimum wage determined by the Governorships.</p>
<b>Output indicators (targeted results)</b>	Preventing workers from receiving wages below the daily minimum wage
<b>Timeline and Deadline Date</b>	September 2025
<b>Input (budget/resources)</b>	ofi personnel (eg. social workers and an agricultural engineer)
<b>Responsible staff (title/department)</b>	Mustafa DENİZ (sustainability operations coordinator)

Wage Payment and Calculation	
Benchmarks	Compliance Status
<p><b>C.7.1:</b> All payments to workers, including hourly wages, piecework, fringe benefits and other incentives shall be calculated, recorded, and paid in a manner that is convenient to workers (e.g., in cash, by bank transfer or check).</p> <p><b>C.8.1:</b> Employers shall compensate workers for all hours worked.</p> <p><b>C.8.2:</b> Employers shall comply with all applicable laws, regulations, and procedures governing the payment of premium rates for work on holidays, rest days, and overtime. There might, however, be specific working schemes voluntarily agreed upon by the workers to work on holidays and rest days for short-term seasonal work, which would make this provision unappealing.</p> <p><b>C.8.3:</b> Workers shall be informed in writing or orally, where necessary, in language(s) spoken by workers, about overtime wage rates prior to undertaking overtime.</p>	<b>Noncompliance on all farms</b>
<b>Findings/Noncompliance Explanation</b>	<p>Monitors verified with farmers that they do not receive any premiums for their production for the company.</p> <p>There are no active unions in agricultural labor or other kinds of memberships of organizations. Therefore, no related deductions are applicable.</p> <p>The workers were not informed about the overtime and overtime rates prior to agreeing to the overtime work, and they were also not paid for the overtime.</p>

	<p>The farmer agrees to one 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 determined that the payments to be transferred to the workers were not followed.</p> <p><u>Source:</u> Interviews and observation</p>
<b>Company Action Plan</b>	
<b>Activity</b>	<p>ofi is working to raise awareness on this matter; however, public intervention is essential. Before the harvest season, the governor's office determines the wage rates and communicates them to the villages. In addition, the governor's office could specify other aspects of working conditions, such as working hours and overtime requirements. These decisions are made by the Wage Determination Commission, which typically includes only one representative from the private sector.</p> <p>In this context, the FLA could advocate for the inclusion of more private sector companies and worker representatives in these Wage Determination Commissions. This would allow for a broader discussion of current issues, enabling other companies and more worker representatives to share their perspectives within the commission.</p>
<b>Output indicators (targeted results)</b>	To raise awareness about working conditions and wages (for farmers, workers and labor contractors).
<b>Timeline and Deadline Date</b>	September 2025
<b>Input (budget/resources)</b>	ofi personnel (eg. social workers and an agricultural engineer)
<b>Responsible staff (title/department)</b>	Mustafa DENİZ (sustainability operations coordinator)

Workers Awareness	
Benchmarks	Compliance Status
<p><b>C.11.1:</b> Employers shall make every reasonable effort to ensure workers understand their compensation, including:</p> <p><b>C.11.1.5:</b> 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>	<b>Noncompliance on farm 2</b>
<b>Findings/Noncompliance Explanation</b>	<p>Most workers are aware of the legally entitled minimum wage for hazelnut harvest.</p> <p>For one farmer (farm 2), the wage was not agreed upon between the farmer and workers.</p> <p><u>Source:</u> Interviews and observation</p>
<b>Company Action Plan</b>	
<b>Activity</b>	The minimum wage for seasonal agricultural work is determined by the local governor's office. This wage may be higher than the amount agreed upon between the worker and the farmer. ofi emphasizes this topic during training sessions for seasonal migrant workers and farmers. During these

	<p>sessions, a sample of the seasonal agricultural work contract is also provided to both parties.</p> <p>On the contract, the parties are encouraged to clearly specify details related to the work, such as daily/hourly wages, the number of working days, and other relevant terms.</p>
<b>Output indicators</b> (targeted results)	Increasing awareness on wages and working conditions
<b>Timeline and Deadline</b> <b>Date</b>	September 2025
<b>Input</b> (budget/resources)	ofi personnel (eg. social workers and an agricultural engineer)
<b>Responsible staff</b> (title/department)	Mustafa DENİZ (sustainability operations coordinator)



Overview - Farms vs. Non-compliances

<b>Total number of Farms</b>	<b>15</b>
------------------------------	-----------

	ER	ND	H/A	FL	CL	FOA	HSE	HOW	C	Total
<b>% of farms with one or more non-compliances or risk of non-compliances</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>0%</b>	<b>100%</b>	<b>0%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	
<b>Total number of benchmarks (excl. progressive benchmarks)</b>	48	14	19	19	9	25	16	19	27	196
Farm 1	17	8	1	0	5	0	3	11	5	50
Farm 2	19	8	1	0	2	0	3	11	9	53
Farm 3	20	8	1	0	3	0	3	11	6	52
Farm 4	17	8	1	0	5	0	3	11	6	51
Farm 5	19	8	1	0	4	0	3	11	5	51
Farm 6	22	8	1	0	3	0	3	7	6	50
Farm 7	17	8	1	0	2	0	3	11	6	48
Farm 8	19	8	1	0	2	0	3	11	5	49
Farm 9	19	8	1	0	2	0	3	11	5	49
Farm 10	19	8	1	0	3	0	3	11	5	50
Farm 11	19	8	1	0	2	0	3	11	5	49
Farm 12	18	8	1	0	4	0	7	13	6	57
Farm 13	18	8	1	0	2	0	3	11	5	48
Farm 14	21	8	1	0	3	0	3	11	6	53
Farm 15	17	8	1	0	2	0	3	11	5	47
<b>Total</b>	<b>281</b>	<b>120</b>	<b>15</b>	<b>0</b>	<b>44</b>	<b>0</b>	<b>49</b>	<b>163</b>	<b>85</b>	<b>757</b>
<b>Average % of compliance per code element</b>	60.98	42.86	94.74	100.00	67.41	100.00	79.59	42.81	79.02	74.26

**Code element abbreviations**

Child Labor – CL

Compensation – C

Employment Relationship – ER

Forced Labor – FL

Freedom of Association – FOA

Health, Safety, and Environment – HSE

Hours of Work – HOW

Nondiscrimination – ND