



Sample Monitoring Report



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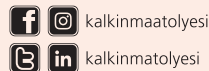
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This report is comprise a sample application of the guideline for the Monitoring Fair Working Conditions in Business to Prevent Child Labour. The company which was sample monitored in the report, was monitored with the indicator, standard and control questions within the scope of the guide and verified by public sources. The last section contains an assessment of the sample monitoring.

Sektor: Food

Company Size: Multinational/Foreign

Sources of Verification Used	Access Method		
	Website	Other public sources	Correspondence with the company
Business Principles	✓		
Supply standards	✓		
Principles on Child Labour for the Supply Chain	✓		
Operational Principles Plan	✓		
Female Employee and Parenting Support Policy	✓		
Complaint Line	✓		
Supplier map	✓		
Social impact assessment report	✓		

🔗 The links in the assessment section of the monitoring table are point to the public documents of the companies.

INDICATOR 1

Company has an effective child labour prevention policy.

The first two criteria could not be verified, as there is no information that the company has a policy document and implementation plan to prevent child labour. Information about 2 of the 5 control questions related to the third criterion could be obtained. The company's texts regulating the Business Principles and *Principles on Child Labour for the Supply Chain* include the goal of preventing child labour and the international standards to be followed in this regard. These documents can be accessed on the website. In addition, activities conducted in different countries and products aimed at preventing child labour are shared with the public via the website. However, there is no information specific to Turkey among the country-based information. For this reason, it is considered that these documents are not sufficient to confirm the third criterion.

The documents show that the company has a target to prevent child labour. However, there is no specific policy document, implementation program and document specific to the Company's production sites in Turkey.

Therefore, company's compliance with the first indicator could not be verified.

CRITERION 1

Company has a well-prepared and comprehensive child labour prevention policy document envisaging combat against child labour in production and/or services and in supply chains in its domain.

The company's *Business Principles* include the prevention of child labour and the international standards to be followed in this regard. The company's commitment for protection of human rights also includes the *Principles on Child Labour for the Supply Chain*. However, no information on a policy document on the prevention of child labour could be reached.

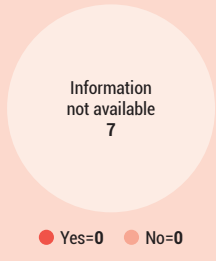
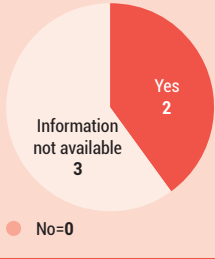
Information
not available
12

● Yes=0 ● No=0

- 1 Is the child labour prevention policy approved by the highest authority?
- 2 Did employees participate to its preparation?
- 3 Was children's participation to its preparation ensured?
- 4 Did suppliers participate to its preparation?
- 5 Did relevant parties in the sector (other companies in the sector or region, professional organizations, public institutions, etc.) participate to its preparation?
- 6 Was it prepared with expert support?
- 7 Does it explicitly prohibit the employment of children under legal age specified?
- 8 Does it specify ages and conditions that children can be employed? (in compliance with Criterion 4)

Control questions could not be evaluated as no information could be reached on the existence of a child labour prevention policy document.

Information not available

<p>9 Does it include the principle of providing economic and social benefits to personnel so that they don't have to let their children work? (in compliance with Indicators 4 and 5)</p> <p>10 Does it impose obligations on personnel to prevent child labour?</p> <p>11 Does it include expectations from suppliers in the context of combating child labour?</p> <p>12 Does it include expectations from other organizations that are or will be cooperated with in preventing child labour?</p>	Control questions could not be evaluated as no information could be reached on the existence of a child labour prevention policy document.	Information not available
<p>CRITERION 2</p> <p>Company has a comprehensive and monitorable implementation programme to execute its policy to prevent child labour in its area of responsibility.</p> <p>1 Are activities envisaged by the implementation programme sufficient for and in accord with the objective stated in the policy document against child labour?</p> <p>2 Are persons in the company in charge of implementing the policy against child labour specified?</p> <p>3 Is there a time schedule?</p> <p>4 Is there a budget?</p> <p>5 Is monitoring method specified?</p> <p>6 Was the participation of relevant stakeholders ensured in the preparation of the implementation programme?</p> <p>7 Are institutions to be cooperated in implementation and their responsibilities specified?</p>	<p>In 2017, the company published a brief <i>Operational Principles Plan</i> that addresses the issue of human rights in the supply chain. Child labour is also included in this plan in a very general way (e.g. dissemination of programs to eliminate child labour). However, no information on an implementation plan to directly prevent child labour could be reached.</p>	 <p>Information not available 7</p> <p>● Yes=0 ● No=7</p>
<p>1 Are activities envisaged by the implementation programme sufficient for and in accord with the objective stated in the policy document against child labour?</p> <p>2 Are persons in the company in charge of implementing the policy against child labour specified?</p> <p>3 Is there a time schedule?</p> <p>4 Is there a budget?</p> <p>5 Is monitoring method specified?</p> <p>6 Was the participation of relevant stakeholders ensured in the preparation of the implementation programme?</p> <p>7 Are institutions to be cooperated in implementation and their responsibilities specified?</p>	Control questions could not be evaluated as no information could be reached on the existence of an implementation plan to prevent child labour.	Information not available
<p>CRITERION 3</p> <p>Company's child labour prevention policy is known by all relevant parties.</p>	Verifying information could be reached for 2 out of 5 control questions.	 <p>Information not available 3</p> <p>● Yes=2 ● No=3</p>

<p>1 Does the company have a written policy to prevent child labour?</p>	<p>Within the scope of the <i>Business Principles</i>, the prevention of child labour and the international standards to be followed in this regard are included. The company also has a document containing the <i>Principles on Child Labour for the Supply Chain</i>.</p>	<p>Yes</p>
<p>2 Do work contracts of company's employees include rights and obligations related to combat against child labour?</p>	<p>Since the sample contract could not be accessed, no information could be reached on this subject.</p>	<p>Information not available</p>
<p>3 Are there (regular) trainings to ensure the participation of all employees to company policy against child labour, including relevant updates?</p>	<p>Information on personnel training could not be accessed.</p>	
<p>4 Is the company policy to prevent child labour announced to personnel, suppliers, sector stakeholders and the public (e.g. through website, bulletins, etc.)?</p>	<p>The company does not have a specific policy document on the prevention of child labour. However, activities carried out in different countries and products to prevent child labour are shared with the public via the website. There is also a document containing the <i>Principles on Child Labour for the Supply Chain</i> which can also be accessed from the website.</p>	<p>Yes</p>
<p>5 Is the policy document and programme of the company to prevent child labour available and accessible to all?</p>	<p>Control question could not be evaluated as no information could be reached on the existence of a child labour prevention policy document.</p>	<p>Information not available</p>
<p>INDICATOR 2</p> <p>Children are employed by the company only at legally permitted ages and conditions.</p>	<p>This indicator relates to situations where children can work within the company. In Turkey, it is possible for children to work within a company within the scope of apprenticeship training. No document could be reached on the procedures followed by the company in this regard.</p> <p>Therefore, company's compliance with the second indicator could not be verified.</p>	
<p>CRITERION 4</p> <p>Works that children can be employed in the company are determined in a way not to harm their development and interfere with their education.</p>	<p>There is no document showing the jobs where children can be employed within the company.</p>	<p>Information not available 5</p> <p>● Yes=0 ● No=0</p>
<p>1 Are the jobs where children can be employed comply with the legislation?</p>	<p>Control questions could not be evaluated as no document showing the jobs where children can be employed within the company could be reached.</p>	<p>Information not available</p>
<p>2 Is it detailed by types of work and age?</p>		
<p>3 Is it based on assessment of risks that types of work in the production process pose to child development and protection?</p>		

4	Is it based on expert advice on effects of working on child health?	Control questions could not be evaluated as no document showing the jobs where children can be employed within the company could be reached.	Information not available
5	(In case the company procures services for human resources) Is it included as a job recruitment criterion in the agreement made with the service provider in recruitments?		
CRITERION 5 All children employed by the company are provided working conditions that are in compliance with the rights of children and workers.		No information or document has been found on whether there are children employed by the company and, if any, on the conditions provided.	<div>Information not available 5</div> <div>● Yes=0 ● No=0</div>
1	Do all children employed have formal contracts?	Control questions could not be evaluated as no information or documents on whether there are children employed by the company and, if any, the conditions provided could be reached.	Information not available
2	Are records of all children employed and their work regularly kept?		
3	(If there are journeymen, apprentices and inters employed in the company) Is the number of journeymen, apprentices and inters employed in the company is commensurate with required supervision, training and guidance?		
4	Are all child employees covered by social security?		
5	Are measures in place to ensure that same standards are applied to boys and girls employed including wages and working conditions?		
CRITERION 6 All measures are taken and observed in ensuring work safety and health for all children employed by the company.		No information or document has been found on whether there are children employed by the company and, if any, on the conditions provided.	<div>Information not available 5</div> <div>● Yes=0 ● No=0</div>
1	Is there regular risk assessment concerning safety and health of working children by using child-specific assessment tools?	Control questions could not be evaluated as no information or documents on whether there are children employed by the company and, if any, the conditions provided could be reached.	Information not available
2	Is there a list of protective equipment that must be provided to children in line with what they do?		
3	Are children provided protective equipment according to their age and what they do?		

4	Are all employees including children given training in work safety and health of children?	Control questions could not be evaluated as no information or documents on whether there are children employed by the company and, if any, the conditions provided could be reached.	Information not available
5	Is there a record of work safety and health problems (accident, disease, etc.) experienced as disaggregated by age groups and gender?		
<div>INDICATOR 3</div> <div>Company has an effective monitoring system in identifying and protecting children employed at illicit ages and conditions.</div>		<div>Every company is expected to have an effective strategy to prevent children from working at an illegal age and conditions. It is confirmed by the documents on the website that the company, about which the monitoring study is carried out, has an effective monitoring mechanism for a product not produced in Turkey. However, no document specific to Turkey and showing the monitoring mechanism for the production areas here could be reached.</div> <div>Therefore, company's compliance with the third indicator could not be verified.</div>	
<div>CRITERION 7</div> <div>There is a well-defined and effective mechanism in the company in identifying children that are employed at illicit ages and conditions.</div>		<div>There is a "Child Labour Monitoring and Remediation System" specific to one of the products supplied by the company, and the principles and workflows of this system are explained on the website. However, this system is only applied to a certain product and in a limited geography. No information regarding that the company has a similar system specific to the products it supplies in Turkey could be reached.</div>	<div>Information not available 6</div> <div><div>● Yes=0</div><div>● No=0</div></div>
1	Is the method of identification laid down in written so as to include basic principles and workflow patterns?	Control questions could not be evaluated as no information on the monitoring system could be reached.	Information not available
2	Is there a team in charge of identification?		
3	Is there a person responsible for identification process?		
4	Are personnel assigned to oversee the identification process trained and experienced in child protection?		
5	Does the identification process provide for the use of multiple methods?		
6	Does the method of identification include an assessment for spotting the areas of production where child labour may step in?		

<p>CRITERION 8</p> <p>There is an effective and relevant intervention system for protecting children identified as employed at illicit ages and conditions.</p>	<p>There is a "Child Labour Monitoring and Improvement System" specific to one of the products supplied by the company, and the principles and workflows of this system are explained on the <i>@website</i>. Within the scope of this system, interventions aimed at preventing children from working in hazardous jobs (e.g. distribution of school materials, catch-up education, refurbishing school buildings, support of school canteens, vocational training, income generating activities for families) are envisaged. However, this system is still being implemented in a certain product and a limited geography. There is also a <i>@social impact assessment report</i> that includes these activities. However, no information on an intervention system being implemented in Turkey could be accessed.</p>	<div>Information not available 12</div> <div>● Yes=0 ● No=0</div>
<p>1 Is the method of intervention formally laid down in written so as to include basic principles and workflow patterns?</p> <p>2 Does the method of intervention provide for needs assessment for children including interviews with children, their families and schools?</p> <p>3 Does the method of intervention provide for the assessment of child's health problems and their treatment?</p> <p>4 Does the method of intervention provide for measures to ensure child's attendance to school?</p> <p>5 Does the method of intervention provide for covering material losses incurred by the child and family (e.g. finding jobs for a parent or elder siblings, continuance of pay as long as child attends school, support to the family concerned in cooperation with NGOs, job guarantee after school)?</p> <p>6 Does the method of intervention include strategies to ensure child's integration with social life?</p> <p>7 Does the method of intervention include a follow-up process to make sure that any child identified and removed from work is not employed in any other area?</p> <p>8 Does the method of intervention provide for covering material losses incurred by the child and family (e.g. finding jobs for a parent or elder siblings, continuance of pay as long as child attends school, support to the family concerned in cooperation with NGOs, job guarantee after school)?</p> <p>9 Does the method of intervention foresee the same methods for both boys and girls?</p> <p>10 If what is identified constitutes an offence is there clarity as to what to do next?</p> <p>11 Is there a team assigned to intervention?</p> <p>12 Is there a person designated as responsible for the process of intervention?</p>	<p>Control questions could not be evaluated as no information on the intervention system could be reached.</p>	<p>Information not available</p>

INDICATOR 4

Company has a wage policy providing a decent standard of life to all its workers and their families.

The fourth indicator is related to the link between preventing child labour and ensuring fair working conditions. Although this issue is expected to be addressed within the scope of the child labour prevention policy, company's efforts specific to this issue should also be taken into account during the evaluation.

The company's *website* states that the company has an approach that supports not just the child but their family to prevent child labour and that a rule has been adopted within the scope of *supply standards* that the wages should be sufficient to meet the basic needs of employees and their dependents. These confirm the first criterion of this indicator. However, no supporting documentation could be reached to confirm implementation of the *supply standards* to provide at least the minimum wage to employees, make progress towards eliminating the difference between the minimum living wage and the legally determined minimum wage, equal pay for equal work, and that contracts should include wage conditions.

Therefore, information about one of the 5 control questions of the first criterion could be obtained, but since no information about four questions could be reached, whether the criterion was met or not could not be evaluated.

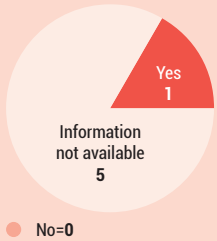
The same is true for the second criterion. Information on two of the five questions regarding the second criterion could be obtained. Although not directly for the company, the company's *supply standards* clearly include the principles of non-discrimination in recruitment, remuneration, promotion, or dismissal on any grounds, and prohibiting deductions from wages as a disciplinary measure. However, three control questions could not be answered.

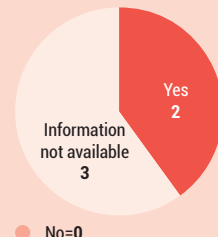
The control questions regarding the written rules have been verified, but there is no information to confirm the extent to which these rules are reflected in the practice. For this reason, the company's willingness to provide this indicator can be verified, but whether the indicator is put into practice could not be verified.

CRITERION 9

The lowest wage paid by the company is sufficient to ensure a decent life for workers and their families.

Verifying information could be reached for 1 out of 6 control questions.



1	Does the company have a written principle that the compensation policy should be regulated in such a way as to ensure a decent standard of living for the employees and their families?	It is stated on the company's <i>website</i> that the company has an approach that supports not just the child but their family to prevent child labour. Although not directly for the company, a rule was adopted within the scope of , <i>supply standards</i> that wages should be sufficient to meet the basic needs of employees and their dependents.	Yes
2	Is there an assessment on income needed by employees to cover their basic needs and of their dependents and ensure fair standard of living?	No information could be reached on this subject.	Information not available
3	Are all employees paid accordingly or at least above the line of poverty determined for the country (and the region if available)?	A rule was adopted within the scope of <i>supply standards</i> to provide at least the minimum wage to employees, make progress towards eliminating the difference between the minimum living wage and the legally determined minimum wage, equal pay for equal work, and that contracts should include wage conditions. However, no information could be obtained on the wages or contracts provided to company employees.	
4	Do male and female employees are paid equally for equal jobs they do?		
5	Do all employees have their formal work contracts that include wages?		
6	Are the records of all payments regularly kept?	No information could be reached on this subject.	
CRITERION 10 Company provides its employees job and income security sufficient to ensure sustained and regular earning.		Verifying information could be reached for 2 out of 5 control questions.	
1	Is it determined in which circumstances fixed term and part-time contracts can be acted with employees?	No information could be reached on this subject.	Information not available
2	Are fixed term and part-time contracts used only in obligatory cases?		
3	Are all employees covered by social security?		
4	Is there any measure to prevent discrimination on any ground in both recruitments and dismissals? (e.g. principles on this laid down in company policy, inclusion of this issue in personnel training, etc.)	While not directly for the company, <i>supply standards</i> prohibit discrimination in hiring, remuneration, promotion or dismissal on any grounds.	Yes
5	Is it guaranteed that there will be no wage cut as a disciplinary sanction?	While not directly for the company, <i>supply standards</i> prohibit deductions from wages as a disciplinary measure.	

INDICATOR 5

Indicator 5: Working conditions offered by the company are favourable for employees in ensuring a sustainable balance of working life, family life and social life.

This indicator, like the fourth one, is related to the support for adult workers to prevent child labour. Supporting documentation was reached for the first of the two criteria regarding this indicator, but no documents were accessed that could be used to answer the control questions about the second criterion.

Information was found on four of the six control questions of the first criterion, which envisages taking parental roles into account in determining working hours. Within the scope of the *female employee and parenting support policy*, at least 18 weeks of paid maternity (parenting) leave is foreseen for those who give primary care to children. Postpartum return to work assurance and flexible working hours have also been adopted and control questions have been confirmed in this regard.

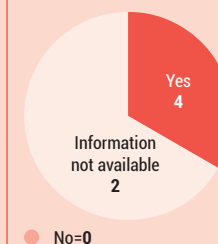
Information could also be reached regarding one of the control questions within the scope of *supply standards*, but no information on working hours, overtime and leave conditions within the company could be found. Therefore, no information was available to confirm the second control question.

In this framework, an evaluation could be made as there were supporting documents related to the first criterion of the fifth indicator, which is related to working conditions. However, the second criterion of this indicator could not be verified, as there is no document regarding the support to be provided to working parents.

CRITERION 11

Company arranges working time and hours in a way to enable its employees to fulfil their parental responsibilities.


Verifying information could be reached for 4 out of 6 control questions.



1 Do contracts of employees cover working hours, overtime work and leaves?	Although a rule regarding this has been adopted within the scope of <i>supply standards</i> , information on whether this information is included in the company contracts could not be reached.	Information not available
2 Are working hours, overtime work and leaves arranged in line with relevant legislation?	No information could be reached on this subject.	
3 Is maternity leave is recognized in line with the ILO Recommendation 191 and to be for 18 months the shortest?	A minimum of 18 weeks of paid maternity (parenting) leave is required for <i>female employees and primary caregivers under the parenting support policy</i> .	Yes
4 Are fathers given paternity leave for at least 2 weeks?	Within the scope of the <i>female employee and parenting support policy</i> , at least 18 weeks of paid leave for primary caregivers and at least 4 weeks for secondary caregivers is envisaged.	

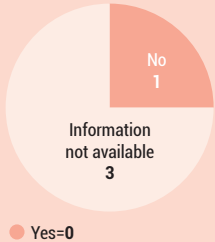

5	Can the employees return to work without any loss of rights after birth?	As part of the <i>female employee and parenting support policy</i> , a problem-free return to work after leave is guaranteed for all female employees and primary or secondary caregivers.	Yes
6	Is there a principle in the company policy regarding flexible arrangement of working hours, overtime and leave conditions in a way that takes into account parental obligations?	Within the scope of the <i>female employee and parenting support policy</i> , the principle of flexible working hours has been adopted to support parenting roles.	
CRITERION 12 Company employees are provided support in fulfilling their parental roles and meeting their needs (e.g. subsidized care, support in participation to social and cultural activities, etc.)		It was not possible to reach any information about the support provided to the employees of the company.	<div><div>Information not available 4</div><div><div>Yes=0</div><div>No=0</div></div></div>
1	Do working parents enjoy support in their children's education and training?	No information could be reached on these subjects.	Information not available
2	Are there minimum standards concerning the scope and conditions of additional support extended to employees in boarding facilities, health services or meals?		
3	Are working parents provided childcare support responding to their needs?		
4	Does the child labour prevention policy of the company include a principle making it clear that support extended to working parents is a part of the rights of employees?		
INDICATOR 6 All employees of the company have the right to associate.		The document that has been reached containing information about the criteria of under this indicator is the <i>supply standards</i> . Information on whether this information is included in the company contracts could not be reached. For this reason, company's compliance with the sixth indicator could not be verified.	
CRITERION 13 Company employees can exercise their legally recognized right to associate.		Verifying information could be reached for 1 out of 4 control questions.	<div><div>Information not available 3</div><div><div>Yes 1</div><div>No=0</div></div></div>

1	Do employment contracts provide for the right to association and join associations?	Although there is a rule regarding this within the scope of <i>§ supply standards</i> , no information on whether this information is included in the company contracts could be reached.	Information not available
2	Is the right to association included in in-service trainings?	No information on personnel training could be reached.	
3	Is there any information material (brochure, etc.) on the right to associate?	No material could be reached in this context.	
4	Is there any principle or decision adopted to prevent any punitive act to those employees exercising their right to associate (e.g. exclusion, contract termination, restriction on social rights, etc.)?	Although not directly for the company, the <i>§ supply standards</i> state that all employees have the right to association and that punitive treatment cannot be applied to those who exercise this right.	Yes
CRITERION 14 Employees can develop alternative organization models or join existing organizations (civil society organizations) or platforms and similar formations that enable them to remain organized.		It is envisaged under the <i>§ supply standards</i> that development of parallel means for association should be facilitated / not be hindered where the right to freedom of association is restricted under law. However, no information could be reached on the extent to which this criterion has been implemented within the company.	<div>Information not available 3</div> <div>● Yes=0 ● No=0</div>
1	Are there organizations such as association/platform, etc. in the branch, enterprise or region that employees can join and that are active in defending the rights of workers?	No information could be reached on these subjects.	Information not available
2	Are there employees having membership in these organizations?		
3	Are there employees who claim that their membership to such organizations is blocked or they face punitive treatment for their membership?		
INDICATOR 7 Company has a functional and effective complaint mechanism.		The next four indicators will help to understand the motivation of the companies regarding the targets. In this context, information was obtained regarding the two criteria sought in order to confirm the existence of an effective complaint mechanism. The first criterion stipulates the existence of a <i>§ complaint</i> mechanism. It has been observed that the company's complaint mechanism has been structured both at the global level and specifically for Turkey, and this mechanism can also be accessed online. There is supporting information that 8 out of 9 control questions have been met, since the <i>§ complaint</i> mechanism is accessible via telephone or online systems, making it possible for everyone to use it, and an update to the <i>§ complaint</i> mechanism has been reported. The only control question that could not be verified under the first criterion was about informing the public about the process after the <i>§ complaints</i> .	


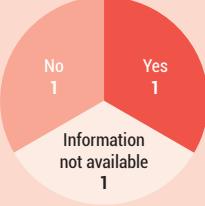
	<p>This control question provides important evidence for the effectiveness of the <i>@complaint</i> mechanism. Thus, although information was obtained about the majority of control questions, it cannot be said that the criterion was completely met.</p> <p>Information on six of the nine control questions of the second criterion could be accessed. This shows that the company is working to increase the use and effectiveness of the <i>@complaint</i> mechanism, but there is not enough information to be able to say that the criterion has been fulfilled. No information on the treatment of employees using the <i>@complaint</i> mechanism could be reached. What is sought here is to ensure that employees who use this tool are not punished. Likewise, although there is information that the evaluation of the complaint mechanism has been made, a directive that will ensure that this evaluation is carried out regularly and to a certain standard has not been reached. Similarly, information was obtained that the <i>@complaint</i> mechanism was included in the trainings, but it could not be confirmed whether this was done systematically. One of the most important control points that will show whether the complaint mechanism is effective is to ensure that the people responsible for the practices that will be the subject of the complaint should not be included in the <i>@complaint</i> mechanism. However, there is no information about the existence of a rule that will ensure this.</p> <p>A significant amount of verification sources can be accessed regarding the efforts to meet the criteria related to the seventh indicator, but there is still some missing information to be able to confirm full compliance with the indicator.</p>								
<p>CRITERION 15</p> <p>Company has an effective (legitimate, accessible, predictable, fair and transparent) complaint mechanism.</p>	<p>Verifying information could be reached for 8 out of 9 control questions.</p> <div data-bbox="1522 866 1744 1115">  <table border="1"> <thead> <tr> <th>Response</th> <th>Count</th> </tr> </thead> <tbody> <tr> <td>Yes</td> <td>8</td> </tr> <tr> <td>No</td> <td>1</td> </tr> <tr> <td>Information not available</td> <td>0</td> </tr> </tbody> </table> </div>	Response	Count	Yes	8	No	1	Information not available	0
Response	Count								
Yes	8								
No	1								
Information not available	0								
<p>1 Is the complaint mechanism procedure is specified in a document?</p>	<p>The company has a complaint mechanism. While there were two systems for internal and external use before, following an assessment carried out, it has been transformed into a single system.</p> <p>The functioning of the mechanism is regulated in written and accessible on the company's <i>@website</i>. There is a similar <i>@complaint system</i> in Turkey as well.</p> <p>Yes</p>								

2 Is it possible to reach this mechanism in different languages and methods?	It is possible to reach the complaint mechanism via the website or by phone. It is also possible to access it in different languages depending on the country.	
3 Is it available for use by all within the company?	Until 2020, two separate systems were used for internal and external complaints. These two systems were combined into a single system later. This system, which is still being piloted, is aimed to be implemented globally by the end of 2022.	
4 Can children use the complaint mechanism?	There is no specific information about the children's usage of the system, but from the general information presented, it is understood that there is no regulation preventing children's access.	Yes
5 Is it available for use from without the company?	It is possible for anyone to file a complaint via the website and phone line.	
6 Can third persons (e.g. NGOs active in this issue) file complaints in the name of children?	Although there is no specific information about this, there is also no information to the contrary.	
7 Can complaints be on any issue without limitation?	There are no subject restrictions on the use of the complaint mechanism.	
8 Is the complainant informed about the process after the complaint?	It is stated that information is provided after the complaint is made.	
9 Is the public informed about the process taking place after the complaint?	The number and subjects of complaint applications made from inside and outside the company are available on the website, but there is no information shared with the public regarding the process followed after the complaints were made.	No
CRITERION 16 Measures are taken to increase the use and effectiveness of complaint mechanism..	Verifying information could be reached for 6 out of 9 control questions.	
1 Can a complaint be made anonymously by not giving personal information?	It is left to the complainant's choice to give or not to give their identity information. Each applicant is given an application number and tracking is provided through this number.	Yes

2	Is there any principle or decision adopted to prevent punitive treatment to those employees using the complaint mechanism?	No specific information about this could be found. However, the use of the complaint mechanism is encouraged through the website and the presence of an effective complaint mechanism is counted as one of the company's commitments.	Information not available
3	Does the in-service training include how the complaint mechanism works?	It is stated that the company's employees were trained on the new complaint mechanism. However, no information about whether this subject is included in regular in-service trainings is found.	Yes
4	Is there an information material on complaint mechanism prepared for employees?	There are specific web pages (<i>📄 Complaint System</i>) that provide detailed information on the functioning of the complaint mechanism, both on the company's global website and on the Turkish website.	
5	Are there awareness building activities on the complaint mechanism for parties out of the company?		
6	Is there a unit other than the management to receive complaints?	The website, which provides information about the complaint mechanism, states that there is a separate unit responsible for examining the complaints.	Information not available
7	Is it ensured that persons in charge of receiving complaints have no administrative responsibility in issues that may lead to complaints?	No information could be reached on this subject.	
8	Is there an established method to assess the effectiveness of the complaint mechanism?	It is shared that an evaluation was conducted on the complaint mechanism. However, no methodology or guidance on evaluation not be reached.	
9	Is the effectiveness of the complaint mechanism assessed regularly?		Yes
INDICATOR 8 Company has an effective monitoring-evaluation system for ensuring the compliance of company activities with standards and indicators of child labour prevention policy.		Like the previous indicator, this indicator is also important in terms of evaluating the motivation of the company in reaching the goals it has set. However, company's compliance with the sixth indicator could not be verified.	
CRITERION 17 Company has an effective internal monitoring-evaluation system for its child labour prevention policy in its process of production of goods and services..		The company has published a <i>📄report</i> on the prevention of child labour on the product and geography for which it has a child labour monitoring plan. In Turkey, a <i>📄social impact assessment</i> specific to one of the products the company supplies was conducted. However, a structured internal monitoring-evaluation system for the prevention of child labour could not be found.	<div>Information not available 7</div> <div>● Yes=0 ● No=0</div>
1	Are monitoring-evaluation indicators in combating child labour defined?	Control questions could not be evaluated as no information could be reached on the internal monitoring-evaluation system to prevent child labour.	Information not available

2	Is monitoring-evaluation process structured in a way to cover information coming from the complaint mechanism as well?	Control questions could not be evaluated as no information could be reached on the internal monitoring-evaluation system to prevent child labour.	Information not available
3	Are opinions of relevant parties including children, families and sector stakeholders taken in monitoring-evaluation process?		
4	Is there a person or unit responsible for monitoring-evaluation process?		
5	Is there regular monitoring-evaluation within the company (at least once a year)?		
6	Is expert support sought for monitoring-evaluation process in the company?		
7	Are reports prepared reflecting the outcomes of monitoring-evaluation work?		
CRITERION 18 Company has an effective external auditing mechanism for its internal monitoring-evaluation system.		No information on the external audit mechanism of the company could be reached.	 <p>Information not available 3</p> <p>No 1</p> <p>Yes=0</p>
1	Does external auditing cover all indicators in combating child labour?	No information could be reached on these subjects.	Information not available
2	Is external auditing carried out on periodic basis?		
3	Does the company have a fair production certificate that also covers conditions for the prevention of child labour? Or is it a part of a certification programme in this respect?		
4	Is this programme known and found reliable by the public?	No information shared with the public could be found.	No
CRITERION 19 Outcomes of monitoring-evaluation and auditing are fully and regularly shared with all relevant parties.		No information shared with the relevant parties regarding the monitoring-evaluation and control mechanisms of the company could be reached.	 <p>No 4</p> <p>Yes=0</p> <p>Information not available=0</p>
1	Are outcomes of monitoring-evaluation openly shared with the public including outcomes related to combat against child labour?	No information shared with the public on these issues could be found.	No

2	Are outcomes of external auditing openly shared with the public including outcomes related to combat against child labour?	No information shared with the public on these issues could be found.	No
3	While sharing these outcomes with the public, are there measures to prevent any harm to children and their families?		
4	Is it possible to relevant parties to give feedback about the outcomes of monitoring-evaluation shared?		
<div>INDICATOR 9</div> <div>Company has a regular assessment system and an effective risk management plan on actual and potential effects of its activities on children.</div>		<div>This indicator reflects a new understanding and the strength of companies' will to prevent child labour, as it envisages taking responsibility for identifying and preventing the danger beforehand.</div> <div>Although it was stated in company documents that a risk assessment was conducted, the risk assessment reports regarding the company's production areas in Turkey could not be reached.</div> <div>Therefore, company's compliance with the ninth indicator could not be verified.</div>	
<div>CRITERION 20</div> <div>The company has a regular assessment system regarding actual and potential negative effects of company activities on child labour.</div>		<div>Conducting an assessment on the impact of the company's activities on human rights is included on the @website as a commitment. Although it is stated that three assessments were conducted specific to Turkey, it was only possible to reach a @social impact assessment report in which mainly the child labour remediation activities were evaluated. In addition, the company's annual evaluation report states that a new risk assessment tool has been developed for child labour. However, this tool could not be accessed. No information on a regular assessment system or whether current assessments include child labour was available.</div>	<div>Information not available 5</div> <div>● Yes=0 ● No=0</div>
1	Was there any risk assessment with respect to potential effects on child labour before starting an activity and changes to take place in employment, wages and social rights?	No information could be reached on these subjects.	Information not available
2	Is there regular impact assessment (at least once a year) as long as activities go on?		
3	Is expert support sought for risk and impact assessment?		
4	Are risks addressed separately for girls and boys?		
5	Are the opinions of all parties including children, families, professional organizations and relevant NGOs are taken?		

<p>CRITERION 21</p> <p>There is an effective risk management plan for actual and potential negative effects of company activities on child labour.</p>	<p>No risk management plan has been found regarding the effects of company activities on child labour.</p>	 <p>Information not available 4</p> <p>● Yes=0 ● No=0</p>
<p>1 Has a risk assessment been conducted on the effects of company activities on child labour?</p> <p>2 Is there a written risk management plan?</p> <p>3 Does the risk management plan cover feedback from public institutions, professional organizations and NGOs active in efforts to prevent child labour?</p> <p>4 Is there a method identified to monitor the effects of interventions envisaged by the risk management plan?</p>	<p>No information could be reached on these subjects.</p>	<p>Information not available</p>
<p>INDICATOR 10</p> <p>Company conducts capacity building activities to enhance social and sectorial capacity in combating child labour.</p>	<p>This indicator also serves to specify the commitment of the company in achieving its goals since a company cannot achieve the goal of preventing child labour through carrying out activities limited to its own supply chain only.</p> <p>Information was available only for one control question related to the first criterion of this indicator. In the company's <i>social impact assessment</i> report, it is stated that trainings on the prevention of child labour are organized by the supplier companies for their employees. The information available shows that the activity is carried out in a very limited environment and time.</p> <p>Since no other information could be reached, company's compliance with this indicator could not be verified.</p>	
<p>CRITERION 22</p> <p>Company is engaged in awareness building activities in combating child labour that covers the sector as a whole and its stakeholders in production process.</p>	<p>Verifying information could be reached for 1 out of 3 control questions.</p>	 <p>No 1</p> <p>Yes 1</p> <p>Information not available 1</p>
<p>1 Does the company organize awareness building activities for relevant parties and the public in the context of combat against child labour?</p>	<p>In the <i>social impact assessment</i> report, it is stated that trainings on the prevention of child labour were organized by the supplier companies for the workers.</p>	<p>Yes</p>

2	Does the company share with the public data-based information about the problem of child labour derived from its own activities and other activities in the sector?	In this context, no information shared with the public could be reached.	No
3	Does the company allocate resources to develop good practices at sector-level in combat against child labour?	No information could be reached on this subject.	Information not available
CRITERION 23 Company is engaged in activities to strengthen cooperation with responsible institutions and others in the sector in combating child labour.		The company has published a <i>statement</i> in support of the European Union's mandatory compliance process on human rights and the environment. However, no activities could be confirmed to strengthen <i>cooperation</i> on the prevention of child labour.	
1	Does the company have any initiative to identify existing or prospective cooperation opportunities in order to prevent child labour in its production or services?	No information could be reached on this subject.	Information not available
2	Is the company a part of local/national or international level cooperative structures to prevent child labour in its production or services?	The company is a <i>member</i> of a collaborative organization that aims to promote responsible procurement practices, including the prevention of child labour.	
3	Does the company allocate resources for activities to be carried out in the context of this cooperation?	No information could be reached on this subject.	
CRITERION 24 Company is engaged in activities to strengthen capacity for developing protective interventions in combat against child labour.		No information on activities carried out by the company in this regard could be reached.	
1	Does the company have a plan based on needs analysis on how it can contribute to building social capacity in preventive interventions against child labour?	No information could be reached on these subjects.	Information not available
2	Does the company have a budget allocated to protective interventions against child labour in its own supply chain?		
3	Does the company allocate resources for protective interventions in the region where it is active?		

INDICATOR 10⁺

Company supports all its suppliers to ensure their compliance with 10 key indicators identified for combating child labour.

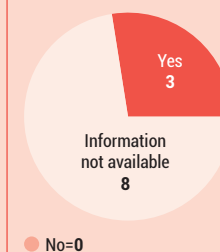
This indicator envisages the company to take responsibility for ensuring the compliance to the top ten indicators in the company's supply chain. It is expected that the company not only asks its suppliers to meet these standards, but also support them in doing so. In this respect, it covers all of the first ten indicators. The company's expectations from its suppliers are written down in its document titled *Supply Standards*. The control question about the mapping of company's supply chain is partly confirmed with the document stating that the company has mapped its supply chain and shared its first-level suppliers in 15 priority products. However, since the document does not cover the whole chain, a complete verification could not be made.

Since no other information could be reached, company's compliance with this indicator could not be verified.

CRITERION 25

All suppliers of the company in its supply chain are effectively monitored and evaluated in the context of child labour prevention policy.

There is supportive information that 3 out of 11 control questions were met.



1 Does the company have a written document of its suppliers' expectations regarding the prevention of child labour?

The company has a publication titled *Supply Standards*, which includes its expectations from its suppliers. These standards also include a minimum age for employment. Accordingly, suppliers are prohibited from employing children under the age of 15 (or, if older, under the compulsory education age except for in the field/garden operated by their parents), and the rule of employing children between the ages of 15-18 in jobs that will support their education and not harm their development has been adopted.

2 Is there an up-to-date mapping of company's supply chain that covers production process down to the bottom level?

The company states that the sources of 95% of its products have been mapped and shares the list of all first-level suppliers in 15 priority products with the public (*supplier map*). However, no mapping of the procurement process other than the first level was found.

3 Is company supply chain openly shared with the public?




The company shares the entire supply chain it has mapped with the public on its website (*supplier map*).

Yes

4	Is there a formal method on how assessment of suppliers is to be made with respect to child labour?	Within the scope of the company's <i>supply standards</i> , the rules that suppliers must comply with, such as the minimum age of employment, freedom of association, use of the complaint mechanism, non-discrimination in recruitment, equal pay for equal work are regulated. However, no method for the evaluation of these expectations has been found.	
5	Is supplier assessment concerning child labour is made in regular intervals (at least once a year)?	Since no method information could be obtained on the supplier evaluation of child labour, these questions could not be evaluated.	Information not available
6	Is supplier assessment concerning child labour guided with expert support?		
7	Does the supplier assessment concerning child labour cover all 10 criteria?		
8	Does the supplier assessment concerning child labour envisage visits to suppliers?		
9	Does the supplier assessment concerning child labour provide for interviews with relevant stakeholders?		
10	Is the method to be pursued in relation to suppliers not complying with indicators guaranteed by a contract?		
11	Is there a regular (at least once a year) risk assessment for child labour in supply chain?		
CRITERION 26 Company extends source and information support to its suppliers in complying with indicators in child labour prevention policy in supply chains.		No information or document has been found on the conditions specified in the supplier contracts, the cost analysis required to fulfill the standards in the supply chain or the support provided to the suppliers.	<div>Information not available</div> <div>8</div> <div> ● Yes=0 ● No=0 </div>
1	Do contracts with suppliers provide for minimum age?	No information could be reached on these subjects.	Information not available
2	Do contracts with suppliers specify conditions for employing children?		
3	Do contracts with suppliers include economic and social rights that must be granted to adult employees?		
4	Is there cost analysis of ensuring expected standards in supply chain?		
5	Is the cost of ensuring expected standards in supply chain considered during procurement?		
6	Is there any support to suppliers (training, provision of tools, etc.) in helping them comply with indicators?		
7	Are minimum time periods for orders specified as covering the supply chain as a whole?		
8	Does the company supervise compliance with minimum time periods for orders in the supply chain?		




INDICATOR 1

Company has an effective child labour prevention policy.

				CRITERION 1	CRITERION 2	CRITERION 3
CRITERION 1 Company has a well-prepared and comprehensive child labour prevention policy document envisaging combat against child labour in production and/or services and in supply chains in its domain.	0	0	12	 <p>Information not available 12</p> <p>● Yes=0 ● No=0</p>	 <p>Information not available 7</p> <p>● Yes=0 ● No=0</p>	 <p>Information not available 3</p> <p>● No=0</p>
CRITERION 2 Company has a comprehensive and monitorable implementation programme to execute its policy to prevent child labour in its area of responsibility.	0	0	7			
CRITERION 3 Company's child labour prevention policy is known by all relevant parties.	2	0	3			



INDICATOR 2

Children are employed by the company only at legally permitted ages and conditions.

				CRITERION 4	CRITERION 5	CRITERION 6
CRITERION 4 Works that children can be employed in the company are determined in a way not to harm their development and interfere with their education.	0	0	5	 <p>Information not available 5</p> <p>● Yes=0 ● No=0</p>	 <p>Information not available 5</p> <p>● Yes=0 ● No=0</p>	 <p>Information not available 5</p> <p>● Yes=0 ● No=0</p>
CRITERION 5 All children employed by the company are provided working conditions that are in compliance with the rights of children and workers.	0	0	5			
CRITERION 6 All measures are taken and observed in ensuring work safety and health for all children employed by the company.	0	0	5			

INDICATOR 3

Company has an effective monitoring system in identifying and protecting children employed at illicit ages and conditions.

					CRITERION 7	CRITERION 8
CRITERION 7 There is a well-defined and effective mechanism in the company in identifying children that are employed at illicit ages and conditions.	0	0	6		 <p>Information not available 6</p> <p>● Yes=0 ● No=0</p>	 <p>Information not available 12</p> <p>● Yes=0 ● No=0</p>
CRITERION 8 There is an effective and relevant intervention system for protecting children identified as employed at illicit ages and conditions.	0	0	12			

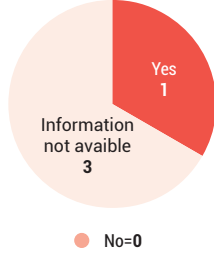

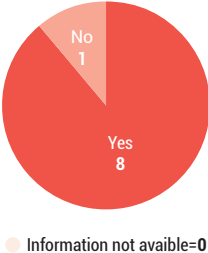
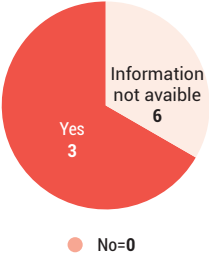
INDICATOR 4

Company has a wage policy providing a decent standard of life to all its workers and their families.


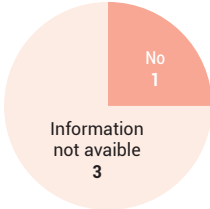
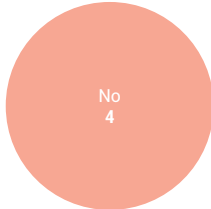


CRITERION 9

CRITERION 10

CRITERION 9 The lowest wage paid by the company is sufficient to ensure a decent life for workers and their families.	1	0	5	<p>Information not available 5</p> <p>Yes 1</p> <p>No=0</p>	<p>Information not available 3</p> <p>Yes 2</p> <p>No=0</p>	
CRITERION 10 Company provides its employees job and income security sufficient to ensure sustained and regular earning.	2	0	3			
INDICATOR 5 Working conditions offered by the company are favourable for employees in ensuring a sustainable balance of working life, family life and social life.					CRITERION 11	CRITERION 12
CRITERION 11 Company arranges working time and hours in a way to enable its employees to fulfil their parental responsibilities.	4	0	2		<p>Information not available 2</p> <p>Yes 4</p> <p>No=0</p>	<p>Information not available 4</p> <p>Yes=0</p> <p>No=0</p>
CRITERION 12 Company employees are provided support in fulfilling their parental roles and meeting their needs (e.g. subsidized care, support in participation to social and cultural activities, etc.)	0	0	4			
INDICATOR 6 All employees of the company have the right to associate.				CRITERION 13	CRITERION 14	


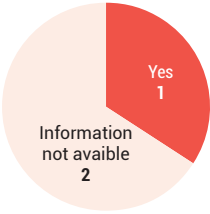

CRITERION 13 Company employees can exercise their legally recognized right to associate.	1	0	3			
CRITERION 14 Employees can develop alternative organization models or join existing organizations (civil society organizations) or platforms and similar formations that enable them to remain organized.	0	0	3			
INDICATOR 7 Company has a functional and effective complaint mechanism.					CRITERION 15	CRITERION 16
CRITERION 15 Şirketin etkin (meşru, erişilebilir, öngörülebilir, adil ve şeffaf) bir şikayet mekanizmasının bulunmaktadır.	8	1	0			
CRITERION 16 Şirketin şikayet mekanizmasının kullanımını ve etkililiğini artırmaya yönelik tedbirler alınmıştır.	6	0	3			
INDICATOR 8 Company has an effective monitoring-evaluation system for ensuring the compliance of company activities with standards and indicators of child labour prevention policy.				CRITERION 17	CRITERION 18	CRITERION 19

● Yes ● No ● Information not available

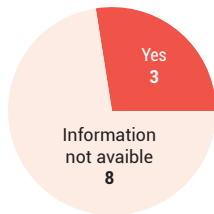

CRITERION 17 Company has an effective internal monitoring-evaluation system for its child labour prevention policy in its process of production of goods and services.	0	0	7	 <p>Information not available 7</p> <p>● Yes=0 ● No=0</p>	 <p>Information not available 3</p> <p>● Yes=0 ● No=0</p>	 <p>No 4</p> <p>● Yes=0 ● Information not available=0</p>
CRITERION 18 Company has an effective external auditing mechanism for its internal monitoring-evaluation system.	0	1	3			
CRITERION 19 Outcomes of monitoring-evaluation and auditing are fully and regularly shared with all relevant parties.	0	4	0			
INDICATOR 9 Company has a regular assessment system and an effective risk management plan on actual and potential effects of its activities on children.					CRITERION 20	CRITERION 21
CRITERION 20 The company has a regular assessment system regarding actual and potential negative effects of company activities on child labour.	0	0	5		 <p>Information not available 5</p> <p>● Yes=0 ● No=0</p>	 <p>Information not available 4</p> <p>● Yes=0 ● No=0</p>
CRITERION 21 There is an effective risk management plan for actual and potential negative effects of company activities on child labour.	0	0	4			

INDICATOR 10

Company conducts capacity building activities to enhance social and sectorial capacity in combating child labour.

				CRITERION 22	CRITERION 23	CRITERION 24
CRITERION 22 Company is engaged in awareness building activities in combating child labour that covers the sector as a whole and its stakeholders in production process.	1	1	1	 <p>No 1</p> <p>Yes 1</p> <p>Information not available 1</p>	 <p>Yes 1</p> <p>Information not available 2</p> <p>No=0</p>	 <p>Information not available 3</p> <p>Yes=0 No=0</p>
CRITERION 23 Company is engaged in activities to strengthen cooperation with responsible institutions and others in the sector in combating child labour.	1	0	2			
CRITERION 24 Company is engaged in activities to strengthen capacity for developing protective interventions in combat against child labour.	0	0	3			
INDICATOR 10⁺¹ Company supports all its suppliers to ensure their compliance with 10 key indicators identified for combating child labour.					CRITERION 25	CRITERION 26

● Yes
● No
● Information not available

CRITERION 25 All suppliers of the company in its supply chain are effectively monitored and evaluated in the context of child labour prevention policy.	3	0	8		 <p>Information not available 8</p> <p>Yes 3</p> <p>No=0</p>	 <p>Information not available 8</p> <p>Yes=0</p> <p>No=0</p>
CRITERION 26 Company extends source and information support to its suppliers in complying with indicators in child labour prevention policy in supply chains.	0	0	8			

GENERAL ASSESSMENT AND RECOMMENDATIONS



The first five indicators of the “Monitoring Guide for Fair Working Conditions in Business to Prevent Child Labour” are directly related to the targets to be achieved for prevention of child labour.

The fact that the company aims to prevent child labour is confirmed by its *Business Principles* and *Child Labour Principles for the Supply Chain* documents. Therefore, although there is no policy document specific to this aim, the first three indicators are among the results targeted by the company.

At the same time, the company embraces the idea that child labour prevention is possible through fair working conditions and supporting working parents. The *Roadmap, female employee and parenting support policy* adopted at the global level demonstrate this point of view. These documents show that the fourth and fifth indicators are also among the targets of the company.

However, no sufficient information was obtained during this monitoring study that these documents have the criteria to fully realize the target of preventing child labour.

One of the most important benefits of **preparing a policy document specific to the prevention of child labour** will be to ensure that the issue is addressed with a holistic approach and to prevent gaps arising from clutter in the documents. At the same time, it will eliminate the risk of incomplete evaluation in terms of monitoring efforts.

The indicators after the sixth one are about the mechanisms that will ensure the realization of these targets or whether they are realized or not. Freedom of association is important in that it is a tool for meeting initial indicators. The four indicators, from the seventh to the tenth, are for monitoring whether the activities are carried out in line with the targets. In this section, it was possible to reach detailed information about the establishment of

⌚ **complaint mechanisms**. On the subject of impact assessment, very little information was available. A ⌚ **social impact assessment report** was examined in this area.

Finally, the 11th indicator, supporting the supply chain in realizing the standards, could be evaluated on the basis of the

⌚ **supply standards** and the ⌚ **supplier map**.

Since information about a significant part of the indicators could not be reached, an evaluation could not be made in those regards. No information could be obtained for the second, third and ninth indicators. It has been observed that the company is part of an Action Group within the scope of its efforts to eliminate child labour at a global level, it is a member of an international initiative, and within this scope, it has established a system to monitor and remediate child labour and has a ⌚ **website** that allows sharing information about this system with the public. These can be considered as examples in terms of demonstrating the company's will to prevent child labour. However, no documents showing that these practices have been expanded in terms of all countries and products could be reached. For this reason, it is necessary to make **the documents containing information about the control questions transparently available to the public** in order to be able to monitor. The resources to be used to verify some indicators (such as employee or supplier contracts) may not be publicly available or available on demand. Non-governmental organizations that will engage in monitoring can access information on such verification sources from internal and external audit reports. For this reason, internal and external audit reports should be among the resources that are publicly available. Public availability of the documents as a source of verification is one way to have an idea of companies' motivations in their policies. For this reason, monitoring efforts are quite valuable even when no information is available. In cases where verification sources cannot be reached, this information will also guide the company in determining the strategy to be followed in this area. Areas where information is not found in this

report can be considered as areas where the verification sources of these should be shared with the public if there is an effort specific to this area.

Working on the **unanswered control questions regarding the complaint mechanism**, which is the strongest aspect of the company, will both ensure that this indicator is fully satisfied, and the information obtained from this will serve as a guide in terms of what needs to be done in other areas. Therefore, completing the missing steps of the seventh indicator can be among the priority activities of the child labour prevention policy to be prepared.

Another strength of the company is the fourth and fifth indicators. Since there are standards for both and these indicators are directly related to the target, completing the missing steps regarding these indicators can also be among the priority activities of the child labour prevention policy. **Activities aimed at reinforcing supportive activities for working parents with fair wages and working conditions** can be prioritized.

The areas regulated by the ninth, tenth and eleventh indicators will need to be spread over time, since there is little information in this field, but they concern three very important points in terms of reaching the target and their realization is related to actors outside the company. Although the company urgently needs to **carry out risk assessments in terms of child labour, strengthen cooperation with other actors, increase social awareness and extend support to the supply chain in the areas it operates**, it is only possible to fully realize these indicators in the medium and long term.



Kingdom of the Netherlands

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