

# SMETA Corrective Action Plan Report (CAPR)

Version 5.0 Dec 2014, 2/4 Pillar Audit; replaces version 4.0 May 2012

Supplier name:	DIKO TEKSTIL DIS TIC. LTD. STI.	
Site country:	TURKIYE / TURKEY	
Site name:	DIKO TEKSTIL DIS TIC. LTD. STI.	
Parent Company name (of the site):	YOKTUR / NONE	
SMETA Audit Type:	<input checked="" type="checkbox"/> 2-Pillar	<input type="checkbox"/> 4-Pillar
Date of Audit	27.04.2017	

## Audit Content:

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health and Safety, Environment and Business ethics. The SMETA Best Practice Guidance Version 5 December 2015 was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers, and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

(2) The audit scope was against the following reference documents:  
Please check appropriate SMETA Audit Type in the above box:

### 2-Pillar SMETA Audit

- ETI Base Code
- SMETA Additions
  - Management systems and code implementation,
  - Entitlement to Work and Immigration,
  - Sub-Contracting and Home working

### 4-Pillar SMETA Audit

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics

### The new ETI Working Hours Clause

- Now integrated into this latest SMETA version.

Where appropriate non-compliances were raised against the ETI code / SMETA Additions and local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.





<b>Audit Company Name: SGS TURKEY</b>	<b>Report Owner (payee): DIKO TEKSTIL DIS TIC. LTD. STI.</b>
<i>Sedex Company Reference: (only available on Sedex System)</i>	<i>Firmanın Sedex sistemine henüz üyeliği yoktur. / The company has not been registered to Sedex system yet.</i>
<i>Sedex Site Reference: (only available on Sedex System)</i>	<i>Firmanın Sedex sistemine henüz üyeliği yoktur. / The company has not been registered to Sedex system yet.</i>

Audit Conducted By			
Commercial	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>
NGO	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Trade Union	<input type="checkbox"/>	Brand Owner	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)	

<i>Auditor Reference Number: (If applicable)</i>	UYGULANABİLİR DEĞİL / NA
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## Audit Details

Audit Details			
A: Report #:	IS17K0-0133		
B: Time in and time out <i>(SMETA BPG recommends 9.00-17.00 hrs. if any different please state why in the SMETA declaration )</i>	Day 1 Time in: 10:00 Day 1 Time out: 11:00	Day 2 Time in: NA Day 2 Time out: NA	Day 3 Time in: NA Day 3 Time out: NA
C: Number of Auditor Days Used: <i>(number of auditor x number of days)</i>	1		
D: Audit type:	<input type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input checked="" type="checkbox"/> Partial Other – Masaüstü inceleme / Desktop review		

E: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail: UYGULANABILIR DEGIL/NA <input type="checkbox"/> Unannounced
F: Was the Sedex SAQ available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If <b>No</b> , why not? (Examples would be, site has not completed SAQ, site has not been asked to complete the SAQ.)	Firmanın Sedex sistemine henüz üyeliği yoktur. / The company has not been registered to Sedex system yet.
G; Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A If <b>Yes</b> , please capture detail in appropriate audit by clause
H: Auditor name(s) and role(s):	HATICE SIRIN – DENETCI / AUDITOR
I: Report written by:	HATICE SIRIN
J: Report reviewed by:	SEDA BAYER
K: Report issue date:	27.04.2017
L: Supplier name:	DIKO TEKSTIL DIS TIC. LTD. STI.
M: Site name:	DIKO TEKSTIL DIS TIC. LTD. STI.
N: Site country:	TURKIYE / TURKEY
O: Site contact and job title:	PINAR TECER – SOSYAL UYGUNLUK SORUMLUSU / COC RESPONSIBLE
P: Site address: (Please include full address)	CIHANGIR MAH. PETROL OFISI CAD. SEHIT KOMANDO CAVUS MURAT ALTINDAS SOK. NO : 17A AVCILAR - ISTANBUL
Site phone:	0090 212 422 91 00
Site fax:	0090 212 422 91 03
Site e-mail:	muhasebe@dikotekstil.com
Q: Applicable business and other legally required licence numbers: for example, business license no, and liability insurance	ISYERI ACMA VE CALISMA RUHSATI NO VE TARIHI / WORKPLACE OPENING AND OPERATING PERMIT NUMBER AND DATE: 10.10.2016 – 63888 / 135
R: Products/Activities at site, for example, garment manufacture, electricals, toys, grower	BAY, BAYAN VE COCUK ORME DIS GIYIM URUNLERI / KNITTED GARMENTS FOR MEN, WOMEN AND KIDS
S: Audit results reviewed with site management?	EVET / YES

T: Who signed and agreed CAPR ( <i>Name and job title</i> )	PINAR TECER – SOSYAL UYGUNLUK SORUMLUSU / COC RESPONSIBLE			
U: Did the person who signed the CAPR have authority to implement changes?	EVET / YES			
V: Present at closing meeting (Please state name and position, including any workers/union reps/worker reps):	PINAR TECER – SOSYAL UYGUNLUK SORUMLUSU / COC RESPONSIBLE			
W: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee (Çalışan temsilcisi / Worker representative) <input checked="" type="checkbox"/> Other (Acık kapı politikası & Şikayet kutusu / Open door policy & Complaint box) <input type="checkbox"/> None			
X: Are any workers covered by Collective Bargaining Agreement (CBA)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Y: Previous audit date:	20.02.2017			
Z: Previous audit type:		SMETA 2-pillar	SMETA 4-pillar	Other
	Full Initial	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Periodic	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Full Follow-Up Audit	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Partial Follow-Up	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Partial Other*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	*If other, please define: UYGULANABİLİR DEĞİL / NA			

**Guidance:**

The Corrective Action Plan Report summarises the site audit findings and a corrective, and preventative action plan that both the auditor and the site manager believe is reasonable to ensure conformity with the ETI Base Code, Local Laws and additional audited requirements. After the initial audit, the form is used to re-record actions taken and to categorise the status of the non-compliances.

N.B. observations and good practice examples should be pointed out at the closing meeting as well as discussing non-compliances and corrective actions.

To ensure that good practice examples are highlighted to the supplier and to give a more ‘balanced’ audit a section to record these has been provided on the CAPR document (see following pages) which will remain with the supplier. They will be further confirmed on receipt of the audit report.

**Root cause (see column 4)**

*Note: it is not mandatory to complete this column at this time.*

**Root cause refers to the specific procedure or lack of procedure which caused the issue to arise. Before a corrective action can sustainably rectify the situation it is important to find out the real cause of the non-compliance and whether a system change is necessary to ensure the issue will not arise again in the future.**

**See SMETA BPG Chapter 7 ‘Audit Execution’ for more explanation of “root cause”.**

### **Next Steps:**

1. The site shall request, via Sedex, that the audit body upload the audit report, non-compliances, observations and good examples. If you have not already received instructions on how to do this then please visit the web site [www.sedexglobal.com](http://www.sedexglobal.com).
2. Sites shall action its non-compliances and document its progress via Sedex.
3. Once the site has effectively progressed through its actions then it shall request via Sedex that the audit body verify its actions. Please visit [www.sedexglobal.com](http://www.sedexglobal.com) web site for information on how to do this.
4. The audit body shall verify corrective actions taken by the site by either a "Desk-Top" review process via Sedex or by Follow-up Audit (see point 5).
5. Some non-compliances that cannot be closed off by "Desk-Top" review may need to be closed off via a "1 Day Follow Up Audit" charged at normal fee rates. If this is the case then the site will be notified after its submission of documentary evidence relating to that non-compliance. Any follow-up audit must take place within twelve months of the initial audit and the information from the initial audit must be available for sign off of corrective action.
6. For changes to wages and hours to be correctly verified it will normally require a follow up site visit. Auditors will generally require to see a minimum of two months wages and hours records, showing new rates in order to confirm changes (note some clients may ask for a longer period, if in doubt please check with the client).

## Corrective Action Plan

Corrective Action Plan – non-compliances									
Non-Compliance Number <i>The reference number of the non-compliance from the Audit Report, for example, Discrimination No.7</i>	New or Carried Over <i>Is this a new non-compliance identified at the follow-up or one carried over (C) that is still outstanding</i>	Details of Non-Compliance <i>Details of Non-Compliance</i>	Root cause <i>(completed by the site)</i>	Preventative and Corrective Actions <i>Details of actions to be taken to clear non-compliance, and the system change to prevent re-occurrence (agreed between site and auditor)</i>	Timescale <i>(Immediate, 30, 60, 90,180,365)</i>	Verification Method <i>Desktop / Follow-Up [D/F]</i>	Agreed by Management and Name of Responsible Person: <i>Note if management agree to the non-compliance, and document name of responsible person</i>	Verification Evidence and Comments <i>Details on corrective action evidence</i>	Status <i>Open/Closed or comment</i>
SAĞLIK VE GUVENLIK NO.3 / HEALTH AND SAFETY NB.3  LL  #1	YENİ / NEW	Firmada doktor odasının bulunmadığı tespit edilmiştir.  It was noted that there was no infirmary in the company.	-	Lütfen doktor odası temin ediniz.  It is recommended that an infirmary should be provided.	30 GÜN / 30 DAYS	MASAUSTU INCELEME / DESKTOP REVIEW	EVET/YES  PINAR TECER	<b>27.04.2017 tarihli masaüstü doğrulama:</b> Firmanın mail yoluyla SGS Türkiye ofisine gönderdiği resimler incelenmiştir. İlgili uygunsuzluğun giderildiği doğrulanmıştır.  <b>Desktop verification performed on 27.04.2017</b> The pictures that the company sent to SGS Turkey office were reviewed. It was verified that concerning non-compliance was fulfilled.	KAPANDI / CLOSED
SAĞLIK VE GUVENLIK NO.3 / HEALTH AND	YENİ / NEW	Firmada ilk yardım sertifikası olan 2 kişi bulunmaktadır ve bu sayı yetersizdir (toplam personel sayısı: 72).	-	Lütfen her 20 kişiye 1 kişi düşecek şekilde ilk yardım sertifikalı personel bulundurunuz.	60 GÜN / 60 DAYS	MASAUSTU INCELEME / DESKTOP	EVET/YES  PINAR TECER	<b>27.04.2017 tarihli masaüstü doğrulama:</b> Firmanın mail yoluyla SGS Türkiye ofisine gönderdiği	KAPANDI / CLOSED

SAFETY NB.3 LL+ETI 3.2 #2		It was noted that there were 2 first aid certified employees and the number of them was insufficient (the number of total employees: 72).		It is recommended that 1 employee should be available for each 20 workers.		REVIEW		dökümanlar incelenmiştir. İlgili uygunsuzluğun giderildiği doğrulanmıştır.  <b>Desktop verification performed on 27.04.2017</b> The documents that the company sent to SGS Turkey office were reviewed. It was verified that concerning non-compliance was fulfilled.	
SAĞLIK VE GUVENLIK NO.3 / HEALTH AND SAFETY NB.3 LL+ETI 3.5 #3	YENI / NEW	Firmada iş sağlığı ve güvenliği komitesinin henüz oluşturulmadığı tespit edilmiştir.  It was noted that occupational health and safety committee was not established yet in the company.	-	Lütfen iş sağlığı ve güvenliği komitesi oluşturunuz ve toplantı tutanaklarını muhafaza ediniz.  It is recommended that occupational health and safety committee should be established and meeting minutes should be kept.	30 GÜN / 30 DAYS	MASAUSTU INCELEME / DESKTOP REVIEW	EVET/YES PINAR TECER	<b>27.04.2017 tarihli masaüstü doğrulama:</b> Firmanın mail yoluyla SGS Türkiye ofisine gönderdiği dökümanlar incelenmiştir. İlgili uygunsuzluğun giderildiği doğrulanmıştır.  <b>Desktop verification performed on 27.04.2017</b> The documents that the company sent to SGS Turkey office were reviewed. It was verified that concerning non-compliance was fulfilled.	KAPANDI / CLOSED
ODEME VE YAN HAKLAR NO.5 / WAGES AND BENEFITS NB. 5 LL #1	YENI / NEW	Firmada çalışanların ödemelerinin tümü SGK sistemine bildirilmemekte, asgari ücret üstü maaş farkları ve fazla mesailer gayri resmi yoldan nakit olarak ödenmektedir.  It was noted that total payment amounts of the workers were not registered to Social Security Foundation completely. Wage differentials other than minimum	-	Lütfen tüm ödemelerinizi SGK'ya bildirin ve tüm ödemeleri resmi olarak banka yoluyla yapınız.  It is recommended that whole payments should be registered to Social Security Foundation and paid officially via bank.	365 GÜN / 365 DAYS	TAKIP DENETİMİ / FOLLOW UP	EVET/YES PINAR TECER	-	-

		wage and overtime payments were paid non-officially by cash.							
ÇALIŞMA SAATLERİ NO.6 / WORKING HOURS NB.6 LL + ETI 6.1 #1	YENI / NEW	Firmada yoğun dönemde bazı günlerde toplam (normal + fazla çalışma) çalışma süresi 11 saatlik yasal limiti aşmaktadır.  It was noted that daily total (regular + overtime) working hours exceeded 11 hours legal limit, some days in peak season.	-	Lütfen günlük toplam (normal + fazla çalışma) çalışma süresini en fazla 11 saat ile sınırlandırınız.  It is recommended daily total (regular + overtime) working hours should be limited by maximum 11 hours.	60 GÜN / 60 DAYS	TAKIP DENETİM / FOLLOW UP	EVET/YES  PINAR TECER	-	-

### Corrective Action Plan – Observations

Observation Number <i>The reference number of the observation from the Audit Report, for example, Discrimination No.7</i>	New or Carried Over <i>Is this a new observation identified at the follow-up or one carried over (C) that is still outstanding</i>	Details of Observation <i>Details of Observation</i>	Root cause <i>(completed by the site)</i>	Any improvement actions discussed <i>(Not uploaded on to SEDEX)</i>
YOKTUR/NONE	YOKTUR/NONE	YOKTUR/NONE	YOKTUR/NONE	YOKTUR/NONE

### Good examples

Good example Number <i>The reference number of the non-compliance from the Audit Report, for example, Discrimination</i>	Details of good example noted	Any relevant Evidence and Comments



No.7		
ÖDEMELER VE HAKLAR NO.5 / WAGES AND BENEFITS NB.5 #1	Çalışanlara ücretsiz yemek sağlanmaktadır. / Meal was provided free of charge to employees.	Çalışan ve yönetim görüşmeleri, ödeme kayıtları / Employee and management interviews, payment records
ÖDEMELER VE HAKLAR NO.5 / WAGES AND BENEFITS NB.5 #2	Çalışanlara ücretsiz servis sağlanmaktadır. / Transportation was provided free of charge to employees.	Çalışan ve yönetim görüşmeleri, ödeme kayıtları / Employee and management interviews, payment records

## Confirmation

**Please sign this document confirming that the above findings have been discussed with and understood by you:** (site management)  
*If actual signatures are not possible in electronic versions, please state the name of the signatory in applicable boxes, as indicating the signature.*

<i>A: Site Representative Signature:</i>	PINAR TECER	Title: SOSYAL UYGUNLUK SORUMLUSU / COC RESPONSIBLE Date: 20.02.2017
<i>B: Auditor Signature:</i>	HATICE SIRIN	Title: DENETCI / AUDITOR Date: 20.02.2017
<i>C: Please indicate below if you, the site management, dispute any of the findings. No need to complete D-E, if no disputes.</i>		

D: I dispute the following numbered non-compliances: YOKTUR / NONE		
E: Signed: (If <u>any</u> entry in box D, please complete a signature on this line)	-	-
F: Any other site Comments: YOKTUR / NONE		

## Guidance on Root Cause

### Explanation of the Root Cause Column

If a non-compliance is to be rectified by a corrective action which will also prevent the non-compliance re-occurring, it is necessary to consider whether a system change is required.

Understanding the root cause of the non-compliance is essential if a site is to prevent the issue re-occurring.

The root cause refers to the specific activity/ procedure or lack of activity /procedure which caused the non-compliance to arise. Before a corrective action can rectify the situation it is important to find out the real cause of the non-compliance and whether a system change is necessary to ensure the issue will not arise again in the future.

Since this is a new addition, it is not a mandatory requirement to complete this column at this time. We hope to encourage auditors and sites to think about Root Causes and where they are able to agree, this column may be used to describe their discussion.

### **Some examples of finding a “root cause“**

#### Example 1

Where excessive hours have been noted the real reason for these needs to be understood, whether due to production planning, bottle necks in the operation, insufficient training of operators, delays in receiving trims, etc.

#### Example 2

A non-compliance may be found where workers are not using PPE that has been provided to them. This could be the result of insufficient training for workers to understand the need for its use; a lack of follow-up by supervisors aligned to a proper set of factory rules or the fact that workers feel their productivity (and thus potential earnings) is affected by use of items such as metal gloves.

#### Example 3

A site uses fines to control unacceptable behaviour of workers.

International standards (and often local laws) may require that workers should not be fined for disciplinary reasons.

It may be difficult to stop fines immediately as the site rules may have been in place for some time, but to prevent the non-compliance re-occurring it will be necessary to make a system change.

The symptom is fines, but the root cause is a management system which may break the law. To prevent the problem re-occurring it will be necessary to make a system change for example the site could consider a system which rewards for good behaviour

Only by understanding the underlying cause can effective corrective actions be taken to ensure continuous compliance.

The site is encouraged to complete this section so as to indicate their understanding of the issues raised and the actions to be taken.

**Your feedback on your experience of the SMETA audit you have observed is extremely valuable. It will help to make improvements to future versions.**

**You can leave feedback by following the appropriate link to our questionnaire:**

Click here for A & AB members:

[http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5lw\\_3d\\_3d](http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5lw_3d_3d)

Click here for B members:

[http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY\\_2brg\\_3d\\_3d](http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)



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For more information on Sedex please go to [www.sedexglobal.com](http://www.sedexglobal.com)  
or email [helpdesk@sedexglobal.com](mailto:helpdesk@sedexglobal.com)

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