

Questions for garment brands re Syrian refugees in Turkey

October 2016

Company: Otto

1. Does your company have a policy specifically prohibiting discrimination & exploitative practices against Syrian refugees? How is this policy communicated to vendors in Turkey?

The Otto Group's (OG) social programme is based on our company's Code of Conduct as well as the BSCI CoC which both have clear provisions regarding the prohibition of discrimination and exploitative practices. These provisions are global and very comprehensive and thus do not only cover all countries but also all forms of discrimination (pls refer to BSCI CoC chapter 'no discrimination'). The acknowledgement of the CoC as well as the Terms of Implementation is one of the preconditions for a business relation. Moreover, the Otto Group develops at present a policy in order to ensure that all Syrian refugees working in our Turkish supply chain are legally employed and that labour and human rights are met.

2. How many first tier Turkish vendors does your company have?

In 2016, 119 factories in Turkey, working for 69 independent suppliers, are producing goods for the Otto Group.

3. How many have been audited since in the last year? What percentage of audits have been unannounced?

Almost 50% of the factories have been audited since 1 Jan 2016, and in total almost all factories have an accepted and valid social audit. All audits have been announced. We are still planning the process of changing audits from announced to semi-announced.

4. Does your company carry out audits beyond the first tier? If so what percentage of second & third tier Turkish suppliers have been audited in the last year and what percentage of these audits have been unannounced?

Our focus still lies on first tier suppliers.

5. Do the audit & monitoring teams have Arabic-speakers who have received special training tailored to the situation of Syrian refugees, and do they speak with the workers confidentially?

We are using internal auditors as well as external auditors. Internally, we do not have Arabic speaking auditors who have received special trainings, but the auditors do speak confidentially with workers. As for the external auditors, some of them speak Arabic and confidential worker's interviews are an integral part of the audits.

6. How does your company address the possibility of undeclared subcontracting in its supply chain?

Undeclared subcontracting is a major challenge in international supply chains. The Otto Group has a very strict policy regarding "Illegal subcontracting". All factories that a supplier wants to use for OG production must be audited and approved prior to a first order placement and are subject to regular monitoring. We have systems in place to monitor strict adherence to this policy. Our strong focus however lies on training and qualification programmes for suppliers and factories.

7. Has your company identified supplier factories employing Syrian refugees in the last year? If the answer is yes please state how many factories, if possible

There is no update to this question compared to the [last questionnaire](#) where we stated that we have identified three factories employing Syrian refugees. One case – back in 2014 – was identified through an audit. In one case we drew conclusions from other findings in an audit report, one case was disclosed through the OG qualification programme.

8. Has your company identified supplier factories employing Syrian child refugees in the last year? If the answer is yes please state how many factories, if possible

No, we did not identify any Syrian children in the factories.

9. When Syrian refugees are identified at a supply factory, what process does your company expect the supplier to follow? In particular please state whether they remain in employment.

In general, all factories have to ensure that no worker is employed without a legal work permit. The policy will address, that in case of identified Syrian refugees without legal work permit, they have to be supported with the official registration process and stay employed.

10. Does your company have a remediation plan that addresses instances of discrimination/abuse against Syrian refugees in its supply chain? If yes please provide details of the plan, how it is communicated to refugees, and examples of outcomes if available.

Equal treatment of Syrian Refugees will be addressed in a yet to be released policy.

11. Does your company work with any local NGOs or trade unions to provide remediation services to refugees?

No, not yet, but we are in contact with respective organisations. Especially, in case that Syrian refugee children will be affected, we are planning to work with local NGOs.

12. As Syrian refugees cannot receive social security benefits at this time, is your company taking steps to ameliorate the impact of this?

We engage ourselves in Round Tables and bilateral talks to promote better rights for Syrian refugees.

13. Has your company undertaken any specific training with its first tier suppliers on this issue?

Yes. All suppliers have received comprehensive information and factories of our strategic and important suppliers in Turkey have taken part in our 10 month qualification programme. One part of this programme is dedicated to this issue.

14. What steps has your company taken to ensure that your policies/approach are being implemented by suppliers beyond the first tier?

We are striving for a cascade effect in our supply chain; first tier suppliers are being trained so that they can and will train their suppliers along the chain.

15. Does your company engage with local civil society groups and trade unions on this issue, for instance, in negotiating a policy position & carrying out risk mapping?

We cooperate with trade unions and NGO's via Round Tables, Multistakeholder Initiatives and bilateral contacts.

16. Does your company work with trade unions on identifying health & safety risks for Syrian refugees (where communication may be difficult)?

No, not yet, but health & safety risks will be addressed in our planned policy.

17. Does your company work with trade unions or other partners to offer training and education programmes for refugees?

No

18. Has your company engaged the Turkish Government regarding the legal framework for Syrian refugees?

Yes.

19. Please provide any further information regarding your company's activities on this issue which you think are relevant.

We have developed a policy, which is not released yet. Many points within this questionnaire will be addressed in the policy. The release is planned within 2016.