

Questions for garment brands re Syrian refugees in Turkey

White Stuff Response *in Bold Italics*

Policy:

1. Does your company have a policy specifically prohibiting discrimination & exploitative practices against Syrian refugees? (If so please provide a link to this policy or provide it as an attachment). How is this policy communicated to suppliers in Turkey?

We adopted an approach at the end of 2014 where we wrote a letter to each of our suppliers in Turkey (see attached) outlining our policy. These letters were each hand delivered by our own in-country auditor on an unannounced visit during January 2015. The auditor not only explained the policy to the factory senior management, they walked through the production area to check workers present and delivered our code of conduct poster translated in to Arabic for the factories to display. They are advised to pass these policies down their supply chain. To support our approach, In March 2015, our audit manager in Turkey attended the joint Fair Labour Association (FLA)/Ethical Trading Initiative (ETI) meeting in Istanbul, giving us an up to date view of the situation and a chance to see how other brands were acting.

Audits/risk assessment:

2. How many first tier Turkish suppliers does your company have?
3. How many have been audited since 1 Jan 2015? What percentages of audits have been unannounced?
4. Does your company carry out audits beyond the first tier? If so what percentage of second & third tier Turkish suppliers have been audited since 1 Jan 2015 and what percentage of these audits have been unannounced?
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?
6. How does your company address the possibility of undeclared subcontracting in its supply chain?
7. Has your company identified supplier factories employing Syrian refugees in 2015? If the answer is yes please state how many factories, if possible.
8. Has your company identified supplier factories employing Syrian child refugees in 2015? If the answer is yes please state how many factories, if possible.

We have eleven first tier suppliers in Turkey, we have conducted audits and unannounced head office visits during the year, 100% of the first tier have been audited. We audit sub-contracted stitching factories and all of these have been audited since 1st January 2015. Workers are spoken to confidentially, where language has been an inhibitor we have used a translator. Our code of conduct and our terms and conditions prohibit the use of un-documented workers and where these are found to be refugees, as stipulated in our letter we ask that the factory management facilitate and help the worker obtain their legal documents while keeping them employed.

Remediation:

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. 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.

10. Does your company work with any local NGOs or trade unions to provide remediation services to refugees?
11. As Syrian refugees cannot receive social security benefits at this time, is your company taking steps to ameliorate the impact of this?

As stipulated in our letter we ask that the factory management facilitate and help the worker obtain their legal documents while keeping them employed. Through our membership of ETI we are investigating liaising with NGO's and Trades Unions. Worker remediation would be addressed on a case by case instance suitable to the individual circumstances. We will continue to consider FLA/ETI proposals in addressing issues as we find them.

Capacity building

12. Has your company undertaken any specific training with its first tier suppliers on this issue?
13. What steps has your company taken to ensure that your policies/approach are being implemented by suppliers beyond the first tier?

As stated in question 1, our suppliers are advised to pass our policy down the line to their suppliers in turn. Training for suppliers will be included in our future strategy.

Stakeholder engagement

14. 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?
15. Does your company work with trade unions on identifying health & safety risks for Syrian refugees (where communication may be difficult)?
16. Does your company work with trade unions or other partners to offer training and education programmes for refugees?
17. Has your company engaged the Turkish Government regarding the legal framework for Syrian refugees?

We have to date found interaction and information from both the FLA & ETI very useful and we continue to engage with these partners.

Other information

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

Having our own audit team in Turkey we have close relationships with our suppliers whom have welcomed our approach. We are currently carrying out a further review of the refugee situation and planning to repeat the unannounced visits soon. Through our ETI membership we are generally seeking advice regarding engagement with NGO's and Trades Unions to further develop our effectiveness.