Questions for garment brands re Syrian refugees in Turkey
October 2016

Company: Waikiki

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

We do not tolerate discrimination or exploitive practices against Syrian refugees.

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

LC Waikiki have 181 Turkish suppliers.

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

Since last year, 163 audits have been made. 15% were unannounced and 85% of them were 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?

72 % of second tier suppliers have been audited. 33% of them were unannounced and 67% were semi-announced.

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?

Yes, we have.

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

The use of undeclared subcontracting is prohibited according to supplier contracts. Also, our technical and compliance teams conduct periodical and random factory visits.

- 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 Yes, in limited number.
- 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 Yes, in limited number.
- 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.

We encourage factories to keep employing Syrian Refugees and we make sure Syrian Refugees are treated according to labour law.

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.

We do not tolerate discrimination or exploitive practices against Syrian refugees (or any other workers) in our supply chain. If it is found we have a warning and notice procedure.

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

No.

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

We require our suppliers to follow local Labour Law.

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

No.

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

We do random unannounced follow up audits to Tier 1 and Tier 2 suppliers.

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?

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

We require all employees are treated in compliance with LCW Social Compliance standards (including Health & Safety standards). We also get a compliance audit service from 3rd party companies.

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, we have engaged with Turkish Government in order to improve Syrian Refugees' working conditions.