

Questions for garment brands re Syrian refugees in Turkey

October 2016

Company: Aldi Süd

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

Our Social Standards in Production policy prohibits discrimination and exploitative practices against any worker, regardless of their origin or the country in which they work.

The Social Standards in Production are publicly available on our website.

Moreover, as a member of the FTA/BSCI, our Social Standards in Production are based on the BSCI Code of Conduct, which also contains express provisions in this regard.

All contracts concluded with our importers explicitly reference our Social Standards in Production and the BSCI Code of Conduct. Therefore, compliance with these policies is obligatory and a pre-requisite for entering into a business relationship with ALDI SOUTH.

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

As a primarily food retail chain, the worldwide sales of garment products makes up a very small percentage of our annual revenue. Furthermore, for ALDI SOUTH, Turkey is not a key strategic sourcing country, therefore, we only source small volumes of product from 14 production facilities located in Turkey. Besides, we do not have direct business relationships with the factories but source the products via a limited and stable pool of

importers. However, we are aware of the current situation in Turkey and take this matter seriously.

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

All of the production facilities are regularly audited by independent third-party auditors (to the BSCI/SMETA framework). Since one of our importers is also a member of the Fair Wear Foundation, one production facility has undergone a Fair Wear audit. In addition, the majority of production facilities are directly audited every 3 to 6 months by our importers' staff. All of the audits have been announced. However, we do conduct unannounced audits together with our CR teams in our main sourcing countries and we are considering extending this approach to other risk countries.

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?

Currently, in Turkey, social audits are mainly conducted in first-tier production facilities only. However, some second- and third-tier Turkish production facilities have been visited as part of our Detox programme in order to verify their compliance with environmental requirements.

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?

At present, to our knowledge there are no Arabic-speaking auditors, however, worker interviews carried out in the workers' own language are an integral part of the audits. Please also note that so far no Syrian refugees have been found in any of the production facilities manufacturing goods for ALDI SOUTH.

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

We have a clear policy on unauthorised sub-contracting with strict consequences in the case of non-compliance, which is communicated to all of our importers and a contractual requirement. In addition, our CR staff carry out unannounced inspections at production facilities if suspicions arise that our orders may have been subcontracted without our authorisation. Furthermore, we ask our importers to carry out capacity reviews at production facilities and expect that the respective quality control staff who are on site during production verify on a regular basis whether the entire production is taking place at the production facilities as stated in the contract.

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

No, there have been no Syrian refugees found at any of the production facilities from which ALDI SOUTH sources its products.

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, there have been no Syrian refugees (and, therefore, also no Syrian child refugees) found in any of the production facilities from which ALDI SOUTH sources its products.

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.

Since this has not yet been the case, we do not have a standardised process in place on how to proceed if Syrian refugees are found working in one of the production facilities used for ALDI SOUTH production. However, as with all findings identified in our supply chain, the approach would very much depend on the particular case. If the refugees were illegally employed but treated as regular employees, i.e. paid at least the minimum wage, did not work excessive hours, etc., we would aim to investigate whether it is possible to receive a work permit for the refugee. However, if we found that the refugee is exploited or in danger, our Severe Risk Policy would apply. Also, since this would be a new situation for us, we would most likely work with our importers to approach local NGOs who specialise in this topic in order to receive the necessary advice and support.

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.

As mentioned above, we do not have a specific remediation plan for Syrian refugees, however, tailored remediation is part of the auditing procedure and we expect our importers and production facilities to follow the individual remediation plan accordingly.

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

No, not in Turkey.

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

No.

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

We have drawn all our importers' attention to the situation of Syrian refugees in Turkey and received confirmation from all that they are aware of the issue. We have further requested to inform us immediately if Syrian refugees are found in our supply chain.

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

Our Social Standards in Production are contractual requirements for all of our importers and all of their business partners throughout their supply chain. Currently, we are evaluating which approach would be the most suitable in order to ensure this is implemented beyond first-tier 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?

Not specifically for Turkey, however, we engage with stakeholder groups such as the BSCI, who regularly discuss this and other social compliance issues.

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

No.

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

No, not in Turkey. We do, however, work with an NGO in Austria to support the education of refugees.

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

No.