

Questions for garment brands re Syrian refugees in Turkey

October 2016

Company: Vaude

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

VAUDE adheres to the *Fair Wear Foundation (FWF) Guidance for Affiliates: Risks related to Turkish garment factories employing Syrian refugees*

- <http://www.fairwear.org/ul/cms/fck-uploaded/documents/policydocs/TurkeyRefugeeGuidanceFebruary2015.pdf>

as well as to the FWF Guidance on *Child labour: FWF policy and practice*

- <http://www.fairwear.org/ul/cms/fck-uploaded/documents/labourstandards/ChildLabourPolicyOct2012.pdf>

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

We work together with 1 manufacturer in Istanbul.

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

VAUDE conducted a FWF audit in November 2014 at our manufacturer's factory. We are currently working on a Corrective Action Plan to follow up the findings and improve them

step by step. The next FWF audit will be conducted next year within the normal 3-year-cycle. All FWF audits are 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?

The second and third tier supplier are usually not integrated in our normal monitoring system. However, in terms of our Turkish manufacturer the subcontractor were integrated in the last audit. Besides our manufacturer produces most of the fabrics himself, so he is aware of our requirements regarding Syrian refugee worker.

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?

The FWF work together with Arabic speaking translators to communicate with Syrian refugees. A FWF audit includes confidential worker interviews on- and off-site.

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

We work on developing trustful long-term relationships with our manufacturer. Within this cooperation we are talking openly about subcontractor usage and get updated information two times a year. Besides the subcontractor are checked during FWF audits.

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

According to the information we received from FWF local team checking our factory and their subcontractors, there weren't Syrian refugees employed in our production.

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

Not within the last year, but during the FWF audit in 2014 Syrian child refugees were found working for a subcontractor. VAUDE started immediately a dialogue with other involved brands, the FWF, the parents and local NGOs to set up a remediation system. The remediation includes an agreement with the parents that they will send their children to school. In return they receive an income compensation (based on current minimum wage) and schooling cost financed by the involved brands. The remediation will support the children until they don't have to go to school anymore according to local law and is supervised by the local FWF team, who are also visiting the families and the subcontractor of our manufacturer regularly. We are reporting about the progress in this remediation case in our GRI Sustainability Report. Please consider following link: <http://nachhaltigkeitsbericht.vaude.com/gri/menschen/kinderarbeit.php>

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 expect the supplier to follow the FWF Code of Labour Practices which is the foundation of our business relationship. The CoLP comprises 8 Labour Standards being valid for local as well as for Syrian refugee worker.

<http://www.fairwear.org/ul/cms/fck-uploaded/documents/companies/FWFdocs/fwfcharterjanuary2011.pdf>

When Syrian refugee worker are found at our manufacturer we will discuss intensely with our supplier how we can guarantee decent working conditions and an adequate payment according to law. In addition we will search for the counselling of the FWF to help us handling this situation.

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.

Please refer to question 1.

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

Due to our FWF membership we have access to their local stakeholder network providing us information about the current situation in Turkey and newly drafted laws.

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

We haven't considered this issue yet, because this is the responsibility of Turkish government.

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

We conducted in June 2015 FWF Workplace Education Program training at our manufacturer's factory. This training aims at educating the management and the workers separately in terms of labour standards and laws. Besides they were told to address to the FWF Complaint Hotline in case the internal grievance procedure is not working properly.

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

All our manufacturer are demanded by our general agreement to ensure compliance in all used subcontractor facilities.

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?

VAUDE is in contact with local civil society groups by means of our FWF membership and their networking efforts.

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

Please refer to question 15, as it is the same for trade union cooperation.

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

At the moment, we are working together with a local school to remediate the Syrian child refugee case. In case there will be Syrian refugees, we will find a solution in cooperation with FWF.

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

Please refer to question 11, as the FWF is also in contact with Turkish government.