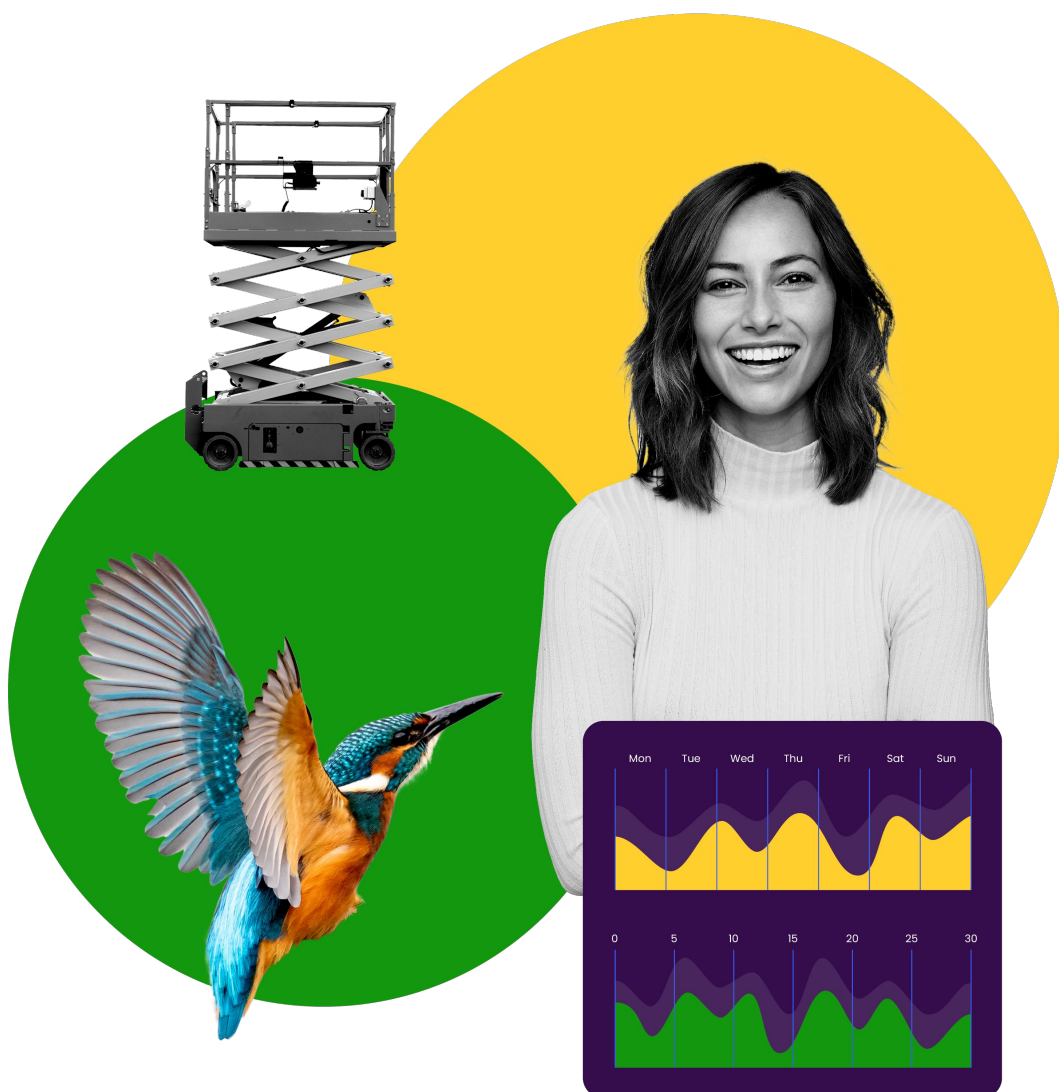


SMETA Corrective Action Plan Report (CAPR)

Version 7



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Audit content

(1) A SMETA audit was conducted which included some or all of labour standards, health and safety, environment and business ethics. The SMETA minimum requirements were applied and the SMETA auditor manual was followed. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA methodology are stated (with reasons for deviation) in the SMETA declaration.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the code areas below.

2-pillar audits include:

- Labour standards:
 - 0. Enabling accurate assessment
 - 1. Employment is freely chosen
 - 1.A. Responsible recruitment and entitlement to work
 - 2. Freedom of association and right to collective bargaining are respected
 - 4. Child labour shall not be used
 - 5. Legal wages are paid
 - 5.A. Living wages are paid
 - 6. Working hours are not excessive
 - 7. No discrimination is practiced
 - 8. Regular employment is provided
 - 8.A. Sub-contracting and homeworkers are used responsibly
 - 9. No harsh or inhumane treatment is allowed
- Health and safety:
 - 3. Working conditions are safe and hygienic
- Environment:
 - 10.A. Environment 2-pillar

4-pillar audits include, in addition to the above:

- Environment:
 - 10.B. Environment 4-pillar
- Business ethics:
 - 10.C. Business ethics

(2) Where appropriate, non-compliances or non-conformances were raised where either local law or the base code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.

(3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

Audit details

Site details

Sedex site reference	ZS417485898	Site name	AYSOY PAZARLAMA KONFEKSİYON TEKSTİL SANAYİ VE TİCARET LTD STİ
Business name	AYSOY PAZARLAMA KONFEKSİYON TEKSTİL SANAYİ VE TİCARET LTD STİ	Site address	HACİEYÜPLÜ MAHALLESİ 3206 SOKAK NO:10 MERKEZEFENDİ / DENİZLİ DENİZLİ TR 20050

Audit details

Sedex company reference	ZC417485884	Auditor company name	Control Union			
Audit company address	Stationsplein 13,, Zwolle, NL, 8011CW					
Date of audit	2026-08-24	Audit conducted by	Hüseyin Hakan Gazel			
Audit pillars	Labour Standards Health and safety Environment 4-Pillar Business ethics					
Time in and out	Day 1		Day 2	Day 3		
	In	09:00	In	09:15	In	09:15
	Out	17:30	Out	18:00	Out	13:15
Audit type	Full initial					

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Was the audit announced?	Announced
Was the Sedex SAQ available for review?	Yes
Who signed and agreed CAPR?	Aybuke Cebe / HR Manager
Any conflicting information SAQ/Pre-Audit Info	No
Is further information available?	No

Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting	There is no union at the facility.		
Reason for absence during the audit	There is no union at the facility.		
Reason for absence at the closing meeting	There is no union at the facility.		

SMETA declaration

Auditor team

SMETA declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.

1. Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform.
2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question.

This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information be gathered and considered from records review, worker interviews, management interviews and visual observation. More information is gathered during the social audit process than is provided here. The audit process is a sampling exercise only and does not guarantee that the audited site prior, during or post-audit, are in full compliance with the Code being audited against. The provisions of this Code constitute minimum and not maximum standards and this Code should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable laws and where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection. The ownership of this report remains with the party who has paid for the audit. Release permission must be provided by the owner prior to release to any third parties.

Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size) N/A

Lead auditor	Hüseyin Hakan Gazel	APSCA Number	32201029
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Additional auditor

Date of declaration	2026-08-26
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Site representation

Declaration	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
Full name	Aybuke Cebe
Title	HR Manager
Date of declaration	2026-08-26

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	Local law Base code	NC ZAF601599753

Findings: non-compliances

ZAF601599753

Non-compliance

Due 2026-11-10

Code area

5 Legal wages are paid

Status

Open*

Workplace requirement

5.B Ensure that workers receive the insurances and benefits (including leave entitlements) they are legally or contractually entitled to.

Time given to resolve

60 days

Issue title

418 - Failure to pay legally required leave entitlements or other benefits - systemic

Verification method

Follow up audit

Description

Documentation review of three severance pay calculations for workers whose employment was terminated during the last 12 months identified that all three (3/3) sampled workers had their severance pay calculated without including the regular meal and transportation benefits provided by the facility. Review of the severance pay calculations and payment receipts confirmed that the workers were regularly provided with monthly meal and transportation benefits amounting to TRY 2,253 and TRY 2,885, respectively. These regular benefits were not included in the wage basis used for the severance pay calculation. As a result, the severance pay of all three sampled workers was calculated below their legal entitlement, as the monetary value of these regular benefits was excluded from the calculation, contrary to Article 14 of Labour Law No. 1475.

//

Son 12 ay içerisinde işten ayrılan çalışanlara ait üç kıdem tazminatı hesaplamasının doküman incelemesi sonucunda, örneklenen üç çalışanın tamamının (3/3) kıdem tazminatının, işletme tarafından düzenli olarak sağlanan yemek ve ulaşım yardımları hesaplamaya dahil edilmeden hesaplandığı tespit edilmiştir. Kıdem tazminatı hesaplamaları ve ödeme dekontlarının incelenmesi sonucunda, çalışanlara aylık 2.253 TL yemek ve 2.885 TL ulaşım yardımı sağlandığı doğrulanmıştır. Bu düzenli yardımlar, kıdem tazminatı hesaplamasında esas alınan ücrete dahil edilmemiştir. Sonuç olarak, örneklenen üç çalışanın tamamının kıdem tazminatı, söz konusu düzenli yardımların parasal değerinin hesaplamaya dahil edilmemesi nedeniyle, 1475 sayılı İş Kanunu'nun 14. Maddesinde belirtilen yasal hak ediş tutarının altında hesaplanmıştır.

Area of non-compliance/non-conformance

Local law

Base code

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Intended corrective and preventative actions, based on root cause analysis

All in-kind benefits, such as meal and transportation services, shall be included in the calculation of severance pay.

//

Yemek ve ulaşım hizmetleri gibi tüm ayni yardımlar kıdem tazminatı hesaplamasına dahil edilmelidir.

Local law reference

LABOR LAW, No: 1475, Date of Acceptance: 25/8/1971, Severance pay: Article 14: (Amended: 29/7/1983 - 2869/3 art.) In calculating the compensation referred to in Article 13 and the wage that will form the basis of the severance pay included in this article, in addition to the wage stated in the first paragraph of Article 26, the money provided to the worker and the contractual and legal benefits that can be measured in money are also taken into account. At the end of the lawsuit to be filed due to the non-payment of severance pay on time, the judge shall rule that the highest interest applied to the deposit according to the unpaid period shall be paid for the delay period. The other rights of the worker arising from the legislation are reserved.

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İŞ KANUNU, No: 1475, Kabul tarihi:25/8/1971 Kıdem tazminatı: Madde 14: (Değişik: 29/7/1983 – 2869/3 md.) 13 üncü maddesinde sözü geçen tazminat ile bu maddede yer alan kıdem tazminatına esas olacak ücretin hesabında 26 ncı maddenin birinci fıkrasında yazılı ücrete ilaveten işçiye sağlanmış olan para ve para ile ölçülmesi mümkün akdi ve kanundan doğan menfaatler de gözönünde tutulur. Kıdem tazminatının zamanında ödenmemesi sebebiyle açılacak davanın sonunda hakim gecikme süresi için, ödenmeyen süreye göre mevduata uygulanan en yüksek faizin ödenmesine hükmeder. İşçinin mevzuattan doğan diğer hakları saklıdır.

* PDF generated at 12:56 (UTC) on 11 Sept 2026. [View this finding on the Sedex platform](#) for live updates and closure details.

Management systems

	Policies and procedures	Resources	Communication and training	Monitoring
1. Employment is freely chosen	✓	✓	✓	✓
1.A. Responsible recruitment and entitlement to work	✓	✓	✓	✓
2. Freedom of association and right to collective bargaining are respected	✓	✓	✓	✓
3. Working conditions are safe and hygienic	✓	✓	✓	✓
4. Child labour shall not be used	✓	✓	✓	✓
5. Legal wages are paid	✓	✓	✓	⚠
6. Working hours are not excessive	✓	✓	✓	✓
7. No discrimination is practiced	✓	✓	✓	✓
8. Regular employment is provided	✓	✓	✓	✓



Not addressed



Fundamental improvements required



Some improvements recommended



Robust management systems

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	Policies and procedures	Resources	Communication and training	Monitoring
8.A. Sub-contracting and homeworkers are used responsibly				
9. No harsh or inhumane treatment is allowed				
10.A. Environment 2-Pillar				
10.C. Business ethics				



Not addressed



Fundamental improvements required



Some improvements recommended



Robust management systems

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Guidance

The Corrective Action Plan Report (CAPR) summarises the site audit findings and a corrective, and preventative action plan that both the auditor and the site manager believe is reasonable to ensure conformity with the ETI base code, local laws and additional audited requirements. After the initial audit, the form is used to re-record actions taken and to categorise the status of the non-compliances/ non-conformances.

Good practice examples should be pointed out at the closing meeting as well as discussing non-compliances/ non-conformances (NCs) and corrective actions, Collaborative Action Required (CAR) findings and the Management Systems Assessment (MSA).

Next steps:

1. The site shall request, via Sedex, that the audit body upload the audit report, NCs, CARs, MSA and good examples. If you have not already received instructions on how to do this then please visit the [Sedex members' e-learning platform](#).
2. Sites shall action its NCs and document its progress via Sedex.
3. Once the site has effectively progressed through its actions then it shall request that the audit body verify its actions. Please visit [Sedex members' e-learning platform](#) for information on how to do this.
4. The audit body shall verify corrective actions taken by the site by either a desktop review process via the Sedex platform or by follow-up audit.
5. Some NCs that cannot be closed off by desktop review may need to be closed off via a follow-up audit charged at normal fee rates. If this is the case, then the site will be notified after its submission of documentary evidence relating to that NC. Any follow-up audit must take place within twelve months of the previous initial/periodic audit and the information from the previous audit must be available for sign off of corrective action.
6. For changes to wages and hours to be correctly verified it will normally require a follow up site visit. Auditors will generally require to see a minimum of two months wages and hours records, showing new rates in order to confirm changes (note some clients may ask for a longer period, if in doubt please check with the client).
7. The site shall develop and share with Sedex an action plan to work on CAR findings, and take actions to work on these areas as identified.
8. The site should use the MSA gradings to help to improve internal systems, focusing where their systems are weakest and the risks of harm are highest. These actions should better prepare them for future audits and help sustain compliance.

Management Systems Assessment (MSA)

A management system is defined as a comprehensive framework comprising of processes, policies, procedures, and tools that are strategically designed and implemented within a business to plan, organise, execute, monitor, and continuously improve its activities. Management systems are the systems that underpin how a company runs its day-to-day operations, makes decisions, and helps avoid the recurrence of common problems.

Where management systems are weak a site is at higher risk of non-compliance over time, the SMETA MSA can help sites to proactively reduce the likelihood of risks occurring. Sites should take actions commensurate with their size and resources, focusing on where their systems are weakest and the likelihood of risks is highest, based on their sector, location and workforce profile.

The MSA Grades do not result in NCs, and will not be re-assessed in follow-up audits.

For more information on management systems please refer to the Management Systems workbooks.

Collaborative Action Required

The SMETA Workplace Requirements identify certain specific issues where a site may not meet the base code, but the usual mechanisms of NC verification and closure are not appropriate, for some or all of the following reasons;

- The audited party does not have the capacity/ responsibility to close the issue without support from other relevant stakeholders, such as commercial partners/buyers.
- Remediation of the issue requires an indeterminate and possibly extended timeframe, rather than a predetermined deadline as set within the Sedex platform.
- There is a risk of adverse consequences if closure of a particular issue is not approached with due consideration and time provided for adequate risk assessment.
- Evidencing effective remediation is complex and it is outside the capacity of existing SMETA methodology to validate through evidence provided during an onsite assessment alone.

These specific WRs have a Collaborative Action Required (CAR) finding raised against them.

Collaborative Action Required findings require a different way of working from other NCs for buyer and supplier members. The activities required to close these issues may involve actions from both buyers and suppliers, as well as additional stakeholders such as third-party labour providers, impacted workers, local NGOs, and trade unions.

Due to the complexity of the issues and the spectrum of potential stakeholders that may need to act, CARs may need long-term closure plans, potentially spanning multiple years. To facilitate a longer-term approach and to reduce the likelihood of undue pressure on suppliers to close issues that may be out of their control, Sedex does not prescribe a closure date nor a verification methodology for these findings. Sedex encourages all its members to work collaboratively and responsibly on these issue areas, sharing responsibilities and actions as appropriate.

When developing a methodology to prioritise action on these more complex areas, Sedex recommends following a due diligence process and prioritising activities based on the most salient risks.

For Suppliers

Where CARs are raised suppliers should create an action plan for how they are going to address these areas. Sedex also recommends suppliers reach out to their buying partners to understand their expectations on these issues and start a constructive dialogue. The action plans can be uploaded on to the Sedex platform, which will change the status of the CAR finding from “open” to “in progress”. Management and assessment of action plans is encouraged as an activity between linked buyer and supplier members.

For Buyers

Where CARs are raised buyer members should prioritise resolution of these issues based on a salient risk approach. Buyers should assess their own roles and responsibilities in the closure of these findings, especially considering any increased financial costs and how these may relate to the buyers own purchasing practices. Buyers should work with suppliers to ensure that closure plans are realistic, taking a long-term approach to improvement where it is necessary, and working with multi-stakeholder initiatives, NGOs, Trade Unions and other third parties to address these issues, which may be widespread. In the interests of enabling transparency, collaboration and long-term effective remediation, the application of commercial penalty against suppliers where these issues are identified and action plans are in place is not encouraged.

For Auditors

Auditors will assess whether the CARs are met through the SMETA audit process and raise the findings where relevant. Auditors will not assess the action plans shared or provide guidance on closure methodology, due to the limitations of assessing scope and responsibilities through a supplier site assessment alone. CAR findings will be superseded and closed in periodic audits. The auditor will assess the Workplace Requirements anew and raise a CAR in following audits until there is no longer a finding to raise.



For more information visit <https://www.sedex.com>