

Questions for garment brands re Syrian refugees in Turkey

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?

Our CoC (publicly available on our website) prohibits discrimination and exploitative practices against any worker. The Social Compliance department by KiK visited Turkish agents and suppliers twice in 2014 (March and August). The aim of these visits was to raise awareness of our agents and suppliers in Turkey for the specific situation of Syrian refugees and to point to the strict adherence of our CoC.

Audits/risk assessment:

2. How many first tier Turkish suppliers does your company have?
36
3. How many have been audited since 1 Jan 2015? What percentage of audits have been unannounced?
90 % have been audited, mainly semi-announced, small percentage 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 since 1 Jan 2015 and what percentage of these audits have been unannounced?
Approx. 80 % audited in Tier 2 and 3, most of them 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?
So far, no refugees have been found during the audits, Arabic-speakers are available
6. How does your company address the possibility of undeclared subcontracting in its supply chain?
Audit-questionnaire requires capacity checks, agents and suppliers are bound by contracts to report subcontracting, physical checks by QS and CSR staff, penalty for unannounced subcontracting
7. Has your company identified supplier factories employing Syrian refugees in 2015? If the answer is yes please state how many factories, if possible
No.
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
No.

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.
n.a. General CoC policy requires at least minimum wage, prohibits discrimination and abuse. This would apply accordingly for Syrian refugees.
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.

n.a. In general, remediation is part of the auditing procedure and is especially stressed in customized third party capacity building measures. This would apply accordingly to Syrian refugees.

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

n.a.

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

n.a.

Capacity building

13. Has your company undertaken any specific training with its first tier suppliers on this issue? Social compliance department conducted two trips (March and August 2014) to address and monitor this particular issue.

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

Step 1: Status quo verification by social audit

Step 2: Qualification visits and capacity building via third party expert teams on a quarterly basis

Stakeholder engagement

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 yet, see "Other information"

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

Not yet, see "Other Information"

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

n.a. yet, if found capacity building measures will be tailored and applied

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

Not yet, see "Other information".

Other information

Since 2014, KiK has been addressing the unique situation of refugees from Syria and other countries of origin who have sought refuge in Turkey. For that purpose, our Social Compliance department has visited our suppliers twice. During these visits, an investigation of the workforce with a particular focus on refugee employment took place. In addition, we have reminded the factory management that these workers must not be treated any different from all other workers in the factory. Again these issues will be tackled in our upcoming journey to turkey in 2016.

Thus far, we have not addressed this issue with local stakeholders on a bilateral level. We hope that our membership in the German Partnership for Sustainable Textiles gives us enough leverage in the future to have an influence on national issues concerning human rights. This is independent from the fact whether we find them in our supply chain.