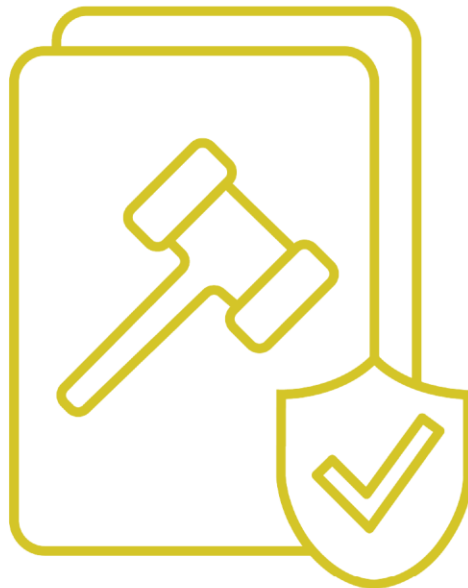




For fair fashion:
improving due diligence,
wages and gender equity in the
Turkish garment sector



**An Analysis of garment factory's
and brand's business conduct**

This research was conducted by
Dr Çağla Ünlütürk and Dr Serkan Öngel

Fair Wear is an international multi-stakeholder labour rights organisation in the garment and textile sector. With our more than 140 frontrunner member brands, we show that it's possible to make clothes in a way that respects workers' rights through conducting human rights due diligence. We also work with trade unions, NGOs, governments, and industry influencers to create lasting systemic change.

This report is published as part of a project with the Dutch Ministry Rijksdienst voor Ondernemend Nederland (RVO) For fair fashion: improving due diligence, wages, and gender equity in the Turkish garment sector with Fair Wear and three Fair Wear member brands: King Louie, Kuyichi and Schijvens

The RVO helps entrepreneurs and organisations to invest, develop and expand their businesses and projects, both in the Netherlands and abroad. The RVO supports partnerships between companies and civil society organisations and aims to set up multi-stakeholder projects to identify and stop Corporate Social Responsibility (CSR) risks or misconduct in international value chains.

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For more information, please visit www.fairwear.org

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This research was conducted on behalf of Fair Wear by Dr Çağla Ünlütürk, an expert on gender equality in Türkiye and Dr Serkan Öngel, leading data scientist and living wage expert with support from Dr Jane Pillinger, global expert on gender equality and gender-based violence in the world of work. Dr Çağla Ünlütürk, together with Dr Jane Pillinger, developed the research design and Dr Çağla Ünlütürk directed the research in Türkiye.

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We want to express our gratitude to the brands and suppliers for their participation and collaboration. Lastly, we deeply appreciate the garment workers who answered our questions attentively, despite their difficult working conditions. We hope that this study will contribute to creating a fair and violence-free working environment.

SUMMARY

Fair Wear Foundation, in partnership with the RVO, developed this research project *For fair fashion: improving due diligence, wages, and gender equity in the Turkish garment sector* looking the Responsible Business Conduct (RBC) of Fair Wear member brands supplying from Türkiye and their Turkish suppliers, to identify the root causes of human rights risks related to living wages and gender equality, with a focus on violence and harassment in the world of work. The aim of this research project is to analyse these two risk areas and how they are impacted by the brands' business practices in order to develop and implement innovative solutions on a structural basis at the brand level and at factory level. This will create opportunities for other brands to learn and replicate these RBC solutions.

Fair Wear worked together with a research team headed by Dr Çağla Ünlütürk, University of Pamukkale, an expert on gender equality in Türkiye and Dr Serkan Öngel, leading data scientist, with support by Dr Jane Pillinger, global expert on gender equality and gender-based violence in the world of work. They devised a two-part research study:

- 1** For fair fashion: improving due diligence, wages, and gender equity in the Turkish garment sector: Interviews with garment workers in Türkiye¹
- 2** For fair fashion: improving due diligence, wages, and gender equity in the Turkish garment sector: An analysis of garment factory's and brand's business conduct

This report covers Part Two, supplier and brand surveys and an analysis of brand Codes of Conduct.

In 2022 and early 2023, the team conducted the research with the twenty Fair Wear member brands and eighteen of their suppliers to better understand the role of responsible business conduct in addressing violence and harassment and living wages in garment factors. The research was split into three parts: an assessment of the brand's Codes of Conduct; a survey sent to the twenty brands; and a survey sent to the eighteen suppliers.

This report assesses the results.

¹ Accompanying this report is Part One, Interviews with garment workers in Türkiye, the baseline participatory study amongst Turkish garment workers for their perceptions on violence and harassment, gender equality and living wages in Türkiye which provides in-depth data on incidences of violence and harassment in garment factories and living wages among female and male workers and the impact of brands' purchasing practices. You can find this report [here](#)

The research team assessed Codes of Conducts from nine brands. Six of the nine brands included 'living wage' in their Code of Conducts. Gender-based discrimination is prohibited in most of the Code of Conducts. Although gender-based violence and harassment was regulated in seven of the Code of Conducts, it was expressed in a single sentence in the majority. Only four brands outlined their regulations about grievance mechanisms. All brands adopted an RBC policy or started to work on one, with the exception of one brand which was planning to adopt a policy. However, only a quarter of the companies trained their business partners about adherence to and implementation of their RBC policy.

The survey with the brands covered the topic of living wages. While eleven brands/companies carry out a partial risk assessment, nine stated that they carried out a thorough risk assessment to address wages below an estimated living wage in the Turkish context. Twelve of the twenty companies have adopted a strategy or roadmap to increase wages in their supply chains in Türkiye'. Common challenges for brands in achieving living wages include rising inflation, lack of transparency and capacity issues.

The second critical theme of the survey conducted with the brands is gender-based violence and harassment. While eight of the brands stated that they carried out a thorough risk assessment, nine only carried out a partial risk assessment to address risks of gender-based violence in the Turkish context. Nevertheless, only three brands had established a strategy or roadmap to reduce gender-based violence and harassment in their supply chain that includes or applies to Türkiye. Among the main risk factors related to gender-based violence and harassment in the supply chain in Türkiye, the most frequently mentioned are structural inequalities which are deeply rooted in Turkish culture, gender power inequalities, male dominance among supervisors and managers, and non-unionisation.

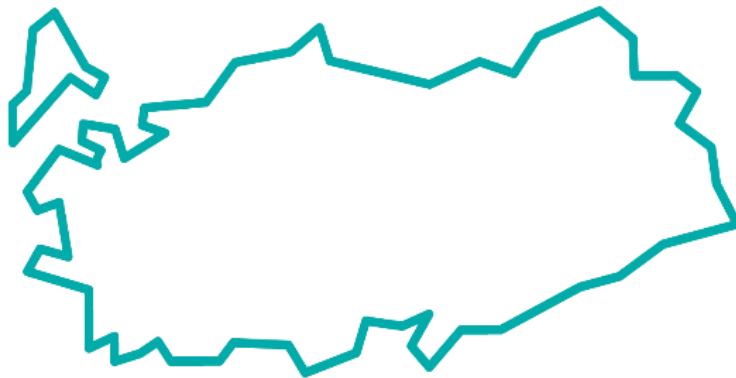
Another survey was conducted with eighteen suppliers producing for Fair Wear member brands. Regarding RBC policies, thirteen of the eighteen suppliers believe that an RBC policy is beneficial for their company. The responses of suppliers on living wages indicate that more steps need to be taken in this regard. Only five of the respondents carried out a special action to implement the living wage in their workplace. High inflation and economic instability are reported as the most important obstacles to paying a living wage.

In addition to the living wage, it is clear that suppliers need to be supported in combating gender-based violence and harassment. Only four of the eighteen suppliers have a policy on gender-based violence and harassment in the workplace. Nevertheless, twelve out of eighteen suppliers stated that they provided awareness training on preventing violence and harassment for workers in their workplace. The statement of suppliers that they have not received any complaint on gender-based violence and harassment shows that the grievance mechanisms are not functioning.

1. INTRODUCTION

1.1 MOTIVATION FOR THE RESEARCH

Globally, the garment sector is a 1,36 trillion Euro industry and employs over 60 million people. It is characterised by geographically dispersed production, long and convoluted supply chains and swift, market-driven changes. It is a complex system—a web of interconnected brands, suppliers, agents, trade unions, NGOs, business associations, governments, etc.—with its own structural, political, social, and financial idiosyncrasies. With the scale and location of its production and the need to entry-level, cheap and flexible labour, the garment industry has been positions as a sector for economic empowerment, especially for women. However, in the global garment industry, the share of the wealth and power remains unevenly distributed, with factory workers often working under poor conditions for low wages, with limited recourse to be able to address labour rights violations. The fluid and fragmented nature of the sector means that brands, especially those producing fashion, frequently move suppliers in search of the cheapest products. Consequently, there are many brands that do not carry out sufficient and thorough human rights due diligence on new (or existing) suppliers. In a race to the bottom, suppliers follow suit by cutting wages and cutting corners to try to ensure their products remain cheap enough. This can lead to issues around safety and unauthorised subcontracting, among others.



Türkiye is the eighth biggest exporter of clothing in the world, and its clothing industry is the second biggest industry in the country. The clothing production plays a big role in the country's exports. Fair Wear has been active in Türkiye since 2002. The majority of suppliers are based in the Istanbul region, with the Izmir region as the second most-important region. In Türkiye alone, 204 factories supply Fair Wear members.

Over the two decades that Fair Wear has worked in Türkiye, we have identified several key risk areas in Türkiye by analysing data from various resources, including research, audit findings, analysis of complaints received through Fair Wear's complaints helpline, and the factory-floor experience of brands sourcing in Türkiye as well as a synthesis of data produced by project partners in Türkiye. The most pressing labour rights violations in the Turkish garment sector are:

- Payment of a living wage
- Excessive overtime
- Low formal labour participation by women
- Brand business practices contributing to a rise in violence and harassment

Gender inequality and gender-based violence and harassment are a significant issue in Türkiye's garment sector. Overall, women comprise 39 per cent of the formal workforce which is the lowest among the OECD countries and has been declining over the last 40 years. Türkiye has a large informal garment sector and women are likely a higher percentage there. The informal garment industry which comes with significant risks, including precarious work, unsafe working conditions and lack of access to remedy.

In the Turkish garment sector, women garment workers tend to be employed in positions that are lower status, temporary, precarious and considered unskilled. Moreover, with only eight per cent of women workers unionised, there are few avenues for women workers to pursue changes.

There is a significant gender pay gap in Türkiye, with Türkiye ranking 124 out of 146 countries on the WEF's Global Gender Gap Index 2022, putting it in last place for the Central Asia region after Azerbaijan and Tajikistan. Türkiye also scores among the lowest for unequal economies with regards gender-based wealth gaps. Much of the gender wage gap can be attributed to occupational segregation and the drastically unequal balance of unpaid care work borne by women. The WEF's Global Gender Gap Index found that 73 per cent of the labour hours of Turkish women goes to unpaid care work, while for men, this number is only 18 per cent.

Studies on violence and harassment show that it is still a prevalent issue, with four in ten women are exposed to physical or sexual violence, yet only 10 per cent of them apply to an institution for help. However, violence and harassment in the world of work remains a hidden issue; there is no official data in Türkiye. Several independent studies exist mainly from the health sector (Çelik and Çelik, 2007; Kara and Toygar, 2018), and a few studies have been conducted in the manufacturing industry (Tatlı and Koç, 2017; Dursun and Aytaç, 2011; Pillinger 2022). However, violence and harassment in the workplace has become increasingly recognised as a problem in Türkiye over the last few years. International organisations such as ILO and the global union IndustriALL have played a major role in this recognition. However, in Türkiye, where patriarchal norms are rigid,

the victim is blamed and it is considered 'shameful' to talk about gender-based violence and harassment, accessing accurate information and data on the issue is challenging.

Wages in Türkiye is also a prevalent and a rising issue. Türkiye has been in a financial crisis since 2018, with the Turkish lira in a downward spiral. Inflation in Türkiye has fluctuated greatly, peaking in October 2022 at 85.51 per cent. Covid-19 hit Türkiye badly and the rising inflation means that, in addition to many people losing their jobs or adjusting to reduced pay, they also faced the rapidly growing costs of their daily necessities. For example, food inflation in Türkiye has risen from 10 per cent in 2020 to 102,6 per cent in 2022. Out of a population of 81 million, approximately 26,4 million people live below the poverty line. The vast majority of workers earn the minimum wage. In some industries, the minimum wage is applied as the maximum wage. However, minimum wage income remains not only below the living wage threshold but also below the hunger threshold.

The garment industry, in particular, is a low-wage industry and wages are far from being a living wage. Insufficient wages often lead workers to undertake excessive overtime work or take on a second job, which results in additional risks. This also has an effect on gender equality, as women are concentrated in low pay positions and can lead to increased vulnerability to violence and harassment, including violence caused by workplace stress and quid pro quo sexual violence and harassment.

In 2019, Fair Wear held a supplier seminar in Türkiye for brands and suppliers on labour rights and the most pressing risks in garment value chains. The main feedback from the 95 participating Turkish suppliers was a need to address the purchasing practices of the brands. The suppliers emphasised the importance of building long-term, trust-based relationships with the brands that will allow them to implement changes.

Additionally, in 2019, Fair Wear and the AGT hosted a seminar on human rights due diligence in Türkiye which included 70 participants from garment brands. The programme focused on the brands' own responsibility through sustainable purchasing practices. Brands discussed the common challenges they face, such as risks concerning freedom of association, Syrian refugees, wages, and subcontracting.

Recognising that there was a lacuna in understanding the role of brands and how their responsible business conduct and human rights and due diligence link to wages, and gender inequality, including violence and harassment, Fair Wear developed a research project—***'For fair fashion: improving due diligence, wages, and equity for women in the Turkish garment sector'***—to provide greater analysis of root causes of responsible business conduct impacts and human rights risks related to violence and harassment and living wages and formulate concrete actions for the various actors—brands, suppliers, government, Fair Wear and like-minded organisations—on how to prevent and mitigate these risks.

AIMS OF THE RESEARCH

- To collect relevant data about gender equality and working conditions in Turkish garment industry in order to provide the context for the two main themes: living wages and gender-based violence and harassment.
- To identify the root causes of human rights risks related to violence and harassment and living wages.
- To reveal and analyse the root causes of responsible business conduct impacts and risks related to living wage and gender-based violence and harassment. (Related to this, separate surveys were also conducted with brands and suppliers.)
- To provide in-depth data on the impact of brands' purchasing practices on incidences of violence and harassment in garment factories (benefiting the previous research conducted by Pillinger in Vietnam) and living wages among female and male workers.
- To identify, analyse and test specific policies and actions that garment brands and suppliers can implement to improve their due diligence and responsible business conduct around two focal areas: payment of a living wage and gender equality, with a focus on violence and harassment. By analysing these two risk areas and how the brands' business practices impact them, the project partners can develop and implement innovative solutions on a structural basis at the factory level. This will create opportunities for other brands to learn and replicate these Responsible Business Conduct (RBC) solutions.

The research project is split into two key parts:

- 1** For fair fashion: improving due diligence, wages, and gender equity in the Turkish garment sector: Interviews with garment workers in Türkiye²
- 2** For fair fashion: improving due diligence, wages, and gender equity in the Turkish garment sector: An analysis of garment factory's and brand's business conduct

The report is the summary of Part Two, supplier and brand surveys and an analysis of Codes of Conduct.

1.2 OVERVIEW OF THE RESEARCH

This report assesses the results of a survey conducted with twenty Fair Wear member brands and eighteen suppliers on Responsible Business Conduct policies of brands and their suppliers on living wages and gender equality with a focus on gender-based violence and harassment as well as analyses the Codes of Conduct of nine brands who submitted their Code to the research team.

Since the number of respondents is quite low, the analysis is mostly based on numbers instead of percentages. Where relevant, the survey data from brands and suppliers are analysed relationally. In addition, reference is made to data Part One Interviews with Garment Workers . All brands and suppliers are anonymised.

In the part two of the report, nine Codes of Conduct of brands will be assessed. The third section analyses the findings of the survey conducted with the brands and the fourth section analyses the findings of the survey conducted with the suppliers.

² Accompanying this report is Part One, *Interviews with garment workers in Türkiye*, the baseline participatory study amongst Turkish garment worker's for their perceptions on violence and harassment, gender equality and living wages in Türkiye which provides in-depth data on incidences of violence and harassment in garment factories and living wages among female and male workers and the impact of brands' purchasing practices. You can find this report here You can find this report here: [Addressing wages and gender inequality in the Turkish garment sector](#)

2. ASSESSMENT OF THE CODE OF CONDUCTS

A Code of Conduct is set of rules, norms and values, responsibilities, and principles of a company. A company's Code of Conduct 'often represent just the first step in a process of improving management processes in support of legal and ethical compliance' (OECD , 2001). They are usually built on the basis of the following four principles: human and labour rights, environment and climate, anti-corruption, and animal welfare.

As part of this research, nine of the twenty Fair Wear member brands shared their Code of Conducts. This was a lower number than desired. When analysing the nine Codes, the researchers found that some put more emphasis on the environment, while others on labour rights, and others on diversity. All Codes of Conduct were grounded in international standards as outlined by the OECD Guidelines for Multinational Enterprises, ILO Conventions, UN Guiding Principles for Business and Human Rights (UNGPs), the UN Sustainable Development Goals and Fair Wear Code of Labour Practices. Some of the Codes of Conduct also emphasised standards derived from the European Convention on Human Rights, EU Corporate Sustainability Reporting Directive (CSRD) and the UN Women's Empowerment Principles.

The analysis of the Codes of Conduct centred on four key areas:

- Living wages
- Diversity and anti-discrimination
- Gender-based violence and harassment
- Grievance mechanisms

2.1 REGULATIONS CONCERNING LIVING WAGES

Six out of nine brands have included 'living wages' in their Code of Conducts. The C9 brand has also included purchasing practices, which are very important for providing a living wage, within the Code of Conduct. Below are the living wage regulations in Code of Conducts:

(The names of the companies are anonymised by giving codes such as C1, C2.)

C2	<i>Payment of living wages</i>
C4	<i>Suppliers should work towards providing a fair living wage</i>
C5	<i>Our principal based on the principle of fairness. We strive for living wages, gender independent pay equality and a fair distribution of income and wealth. We are thus also committed to responsible purchasing practices. In doing so, we are guided by the five principles. We are thus also committed to responsible purchasing practices. In doing so, we are guided by the five principles of the 'Common Framework for Responsible Purchasing'.</i>
C6	<i>Reducing greenhouse gas emissions, transparency along our value chain and the payment of a reasonable living wage for workers are areas on which we have placed our focus. Workers are paid regular wages and overtime compensation. Rules on minimum wages, social security costs, benefit laws and further local regulations are complied with.</i>
C7	<i>The total number of hours worked per week may not exceed 60 hours, including overtime, and employees shall be entitled to at least one day off in every seven-day period.</i>
C8	<i>Promoting fair and equitable wages for all individuals who work in our supply chain, including workers, subcontractors, and suppliers.</i> <i>Noncompliance with minimum wages and wage levels that do not meet the basic need for the workers and their families was also identified as a risk by C8.</i>
C9	<i>Wages and benefits paid for a standard working week shall meet at least legal or industry minimum standards and always be sufficient to meet basic needs of workers and their families and to provide some discretionary income (Fair Wear Foundation).</i> <i>Deductions from wages for disciplinary measures shall not be permitted nor shall any deductions from wages not provided for by national law be permitted.</i> <i>Deductions shall never constitute an amount that will lead the employee to receive less than the minimum wage.</i> <i>Employees shall be adequately and clearly informed about the specifications of their wages including wage rates and pay period.</i> <i>All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid</i> <i>We will request suppliers to share cost price calculations upon request. This includes cost of direct- and indirect labour, materials, overhead, margin etc. This will avoid that buying prices are below cost price. In case the order volume changes the buyer and supplier have the opportunity to discuss if the initial agreed price is still appropriate.</i> <i>We aim to work towards living wages. Therefore, we will assess the actual wages to create insights in the wage gap and follow our action plan towards a phased implementation of living wage.</i>

2.2 REGULATIONS CONCERNING DIVERSITY AND ANTI-DISCRIMINATION

Discrimination is prohibited in most of the Codes of Conduct. Some companies, such as C₃, have also indicated the measures which must be taken to ensure equal opportunities. Code of Conduct regulations regarding discrimination are shown below:

- C₁** *At C₁ we aim to create an environment where difference and diversity are valued by treating everyone fairly, with dignity and respect while providing a safe and healthy work environment for all employees. This also means we make decisions about recruitment, compensation, development opportunities and promotion based only on merit and without regard to race, colour, national origin, religion, sex, age, physical or mental health, sexual orientation or any other characteristic protected by law.*
- C₂** *No discrimination in the workplace*
- C₃** *C₃ allocates a separate place for women employees and maternity protection under the non-discrimination regulation. In addition, equal treatment is detailed in recruitment and employment procedures: 'We promote a work environment that enables inclusion and values the diversity of our employees. We are committed to equal opportunities and reject any form of discrimination or unjustified unequal treatment in employment, for example on the basis of national and ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, migration status, religion or belief. Equal opportunities apply in particular to recruitment and pay policies, development opportunities (training, promotion, etc.), termination practices, retirement, etc. We also take into account the principle of equal pay for workers irrespective of gender for work of equal value. Job-related fringe benefits must be provided equally to each worker. Special attention must also be paid to women: no pregnancy test must be carried out at the time of recruitment. Maternity protection must at least comply with the legal framework and mothers must not be discriminated against in any way (e.g., lower pay when returning to work than before maternity leave).' (C₃)*
- C₅** *Fair remuneration and equal pay for equal work. Promoting diversity and inclusion, and prohibiting any form of discrimination based on and inter alia gender identity, ethnicity, skin colour, religion, social and national origin, political views, language, age, disability or sexual orientation*
- C₆** *We support the protection of internationally proclaimed human rights, fight forced and child labour, uphold gender equality, encourage our supplier to establish the freedom of association and right to collective bargaining, provide a workplace free of harassment and unlawful practices of discrimination, comply with regulations of minimum wages and working hours and ensure a living wage according to local living conditions. No individual shall suffer discrimination in any aspect of employment, including recruitment, hiring, compensation, benefits, work assignments, access to training, advancement, disciplinary action, termination, or retirement on the basis of religion, colour, sex, pregnancy, childbirth, age, national origin, ancestry, sexual orientation, physical or mental impairment, medical condition, disease, genetic characteristics, family support, marital status, socioeconomic status, political opinion, union membership, ethnic group, and all others protected under the law.*
- C₉** *Recruitment, wage policy, admittance to training programs, employee promotion policy, policies of employment termination, retirement, and any other aspect of the employment relationship shall be based on the principle of equal opportunities, regardless of race, caste, colour, gender, sexual orientation, age, religion, political affiliation, union membership, nationality, social origin, deficiencies, or handicaps.*

2.3 REGULATIONS CONCERNING GENDER-BASED VIOLENCE AND HARASSMENT

Although gender-based violence and harassment was regulated in seven of the Codes of Conduct, it was expressed in a single sentence in the majority. However, gender-based violence and harassment forms are also stated in detail in the Code of Conduct of C1.

C1 *Creating a safe, work environment also means treating each other with respect and not tolerating intimidation or harassment in any form. We prohibit any act that could cause another individual to feel threatened including verbal threats, harassment, physical attacks, or any other behaviour that would make others feel unsafe. This includes any conduct - whether physical, verbal, or sexual - that has the purpose or effect of creating an intimidating or hostile workplace. Examples include slurs, offensive remarks or jokes based on a person's race, colour, religion, national origin, sex, age, disability, sexual orientation or other similar characteristics; unwanted touching, assault or intimidating gestures such as blocking a person's movement; requests for sexual favours or unwanted sexual advances, such as leering or making an obscene gesture.*

C3 *A common problem in the textile and apparel supply chain is the toilet ban. In addition to gender-based violence and harassment regulation, toilet bans were also addressed by C3. Physical abuse, threats of physical abuse, punishment or disciplinary measures, sexual and other harassment and intimidation are strictly prohibited. We also pay special attention to the special needs of women: Toilet visits are not to be limited.*

C4 *Suppliers must prevent, not engage in nor support the use of bullying, intimidation, violence, threats of violence, corporal punishment, or physical, sexual, psychological and verbal harassment or abuse. Procedures to ensure punitive measures in cases of harassment and/or discrimination must be put in place. Special measures must be put in place to protect female workers against gender-based violence and harassment in the workplace.*

C5 *Prohibiting gender-based violence or harassment, including sexual harassment*

C8 *No employee shall be the target of physical, sexual, psychological, or verbal harassment or abuse, monetary penalties, or degrading actions as a disciplinary measure.*

C9 *Physical abuse, threats of physical abuse, unusual punishments or discipline, sexual and other harassment, and intimidation by the employer is strictly prohibited*

2.4 REGULATIONS CONCERNING COMPLAINT MECHANISMS

Only four brands have regulated their complaint mechanisms. While other brands have regulated that suppliers should establish a grievance mechanism, C5 has addressed the application to the 'Whistleblower Reporting Channel'.

C1 *If you encounter any unsafe conditions or injuries, or experience incidences of discrimination, intimidation or harassment, report it to a manager or Human Resources immediately. If you are concerned about a substance-abuse problem, get in touch with Human Resources who can support employees in accessing professional help.*

C4 *Suppliers must have a grievance mechanism in place allowing stakeholders to voice their concern if they find that operations of the supplier are adversely affecting human and labour rights, environment, including climate, anti-corruption, and animal welfare. The grievance mechanism should be appropriate to the size of the company and can take the form of a whistle-blower function, worker representation committee, etc. The grievance mechanism should be widely communicated, and accessible to all workers (including temporary workers), and managed in a confidential, unbiased, timely, and transparent manner.*

C5 *Despite great care for human rights, we are aware that violations may still occur. For this reason, we see the setting up of complaints mechanisms as essential, on the one hand as an indicator for recording risks and, on the other, to detect actual violations where they occur and to initiate countermeasures.*

We offer our employees the 'C5 Whistleblower Reporting Channel' for reporting legal and compliance violations. Here, violations of applicable laws, committed by C5 or C5's employees, can be reported securely – and, if desired, without disclosing the identity of the whistleblower. The complaints are filed directly to an external lawyer who represents C5 as an ombudsman.

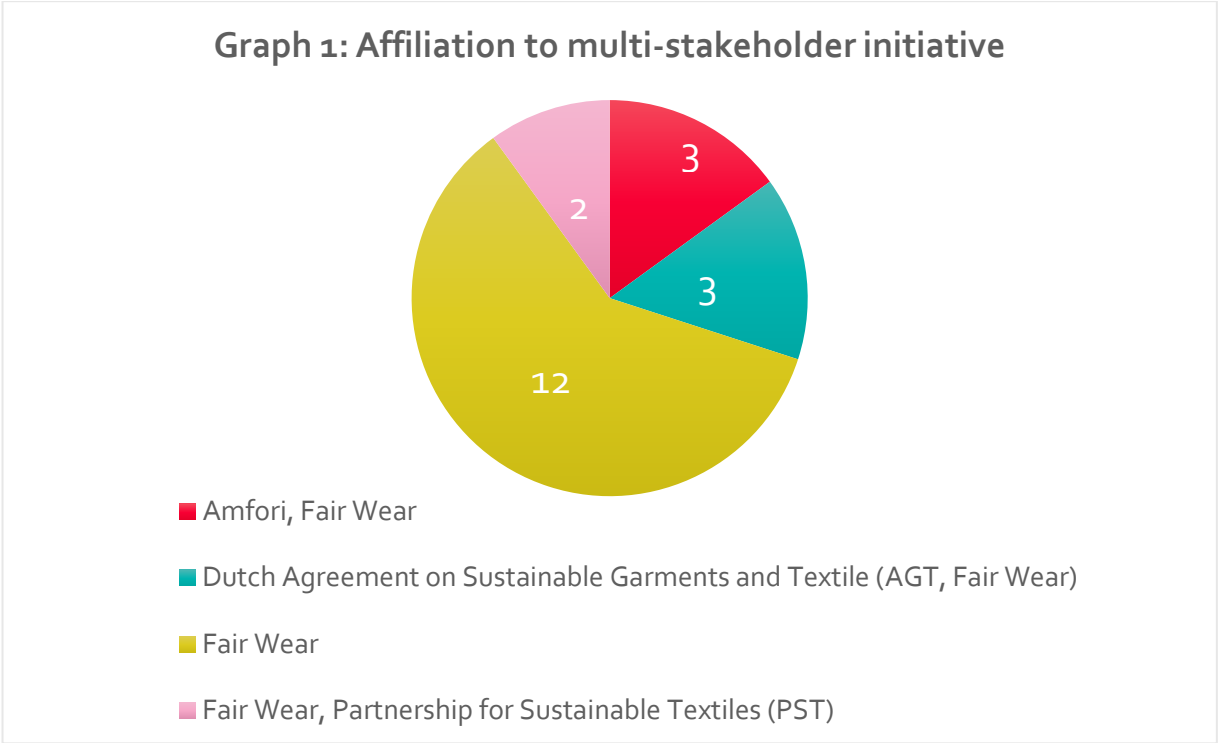
C9 *Business partner are expected to set up a functioning grievance mechanism. For textile suppliers, business partners are expected to implement the Fair Wear grievance mechanism.*

3. ANALYSIS OF SURVEY RESULTS CONDUCTED WITH FAIR WEAR MEMBER BRANDS

Brands should work to implement human rights due diligence, conduct responsible purchasing practices, support and incentivise freedom of association, prioritise gender equality, and ensure workers' access to remedy. This aim of this survey was to better understand brands awareness around gender equality and living

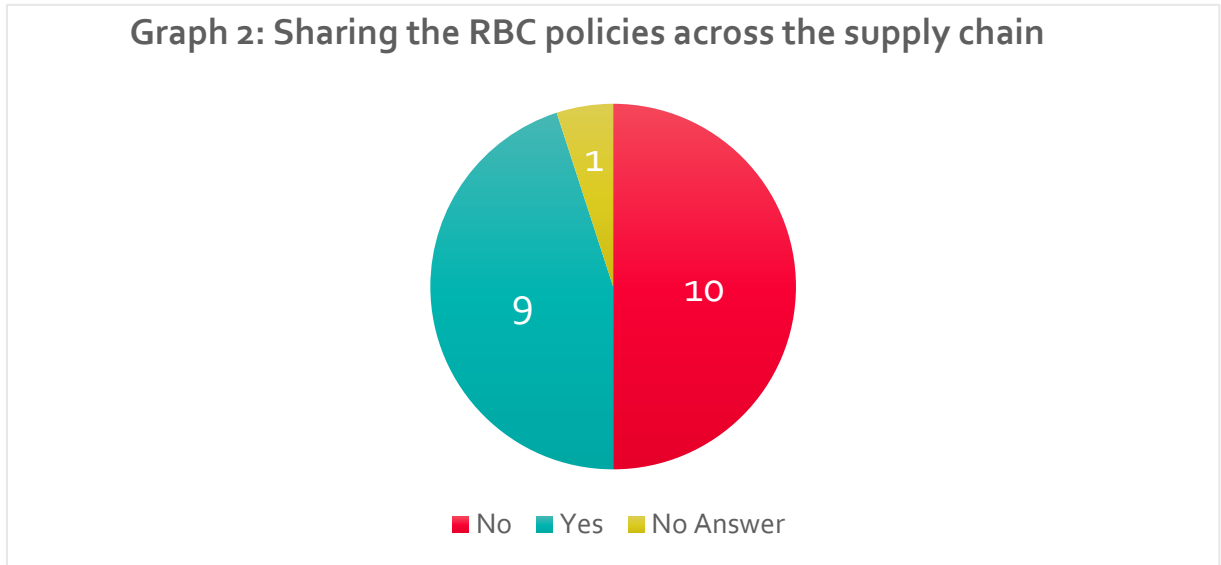
wages in their garment factories as well as their own policies, procedures and supplier relations and the impact these can have on garment workers in their supply chain. The survey also dove into the role of agents and intermediaries.

The research team conducted this survey among twenty Fair Wear brands, three of which are also members of the multi-stakeholder initiative Amfori, three are members of the Dutch Agreement on Sustainable Garments and Textile (AGT) and two are members of the German Partnership for Sustainable Textiles (PST). These affiliations are illustrated in Graph 1.

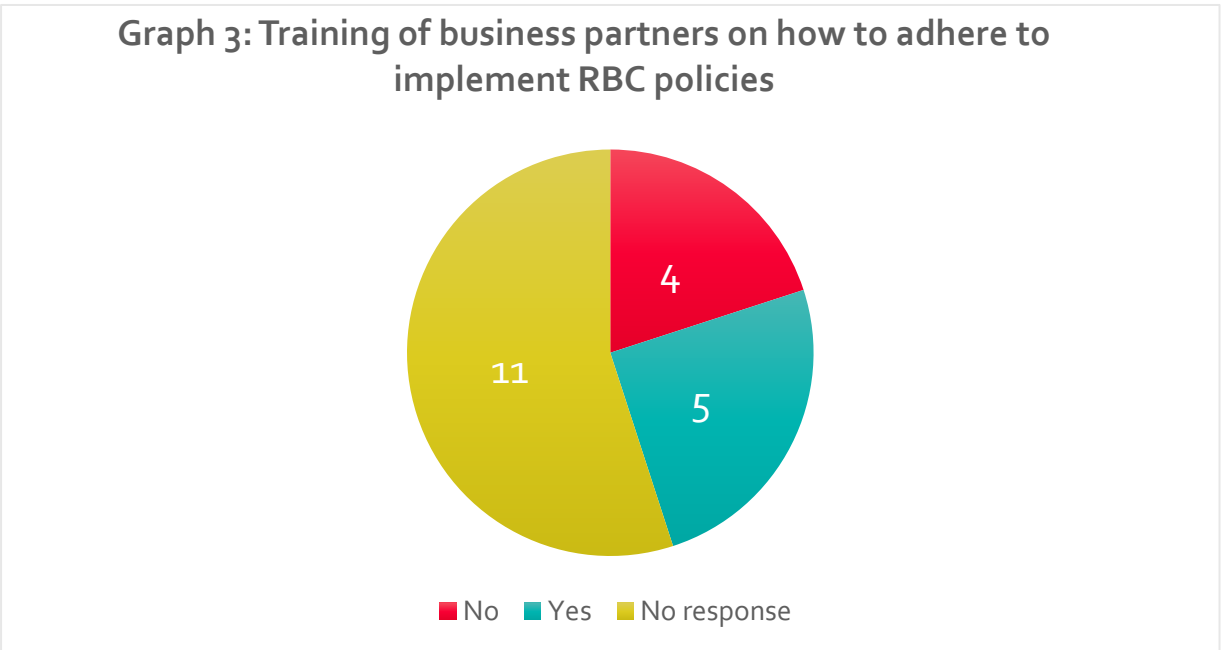


3.1 RESPONSIBLE BUSINESS CONDUCT POLICY OF THE BRANDS

All brands adopted an RBC policy or started to work on one (Graph 2), with the exception of one brand who was planning to adopt a policy. However, only nine of the twenty companies shared their RBC policy across their Turkish supply chain (with suppliers, subcontractors, agents/ intermediaries).



Moreover, as Graph 3 illustrates, only a quarter of the companies trained the business partners such as factory managers, agents and intermediaries located in Türkiye about adherence to and implementation of their RBC policy.

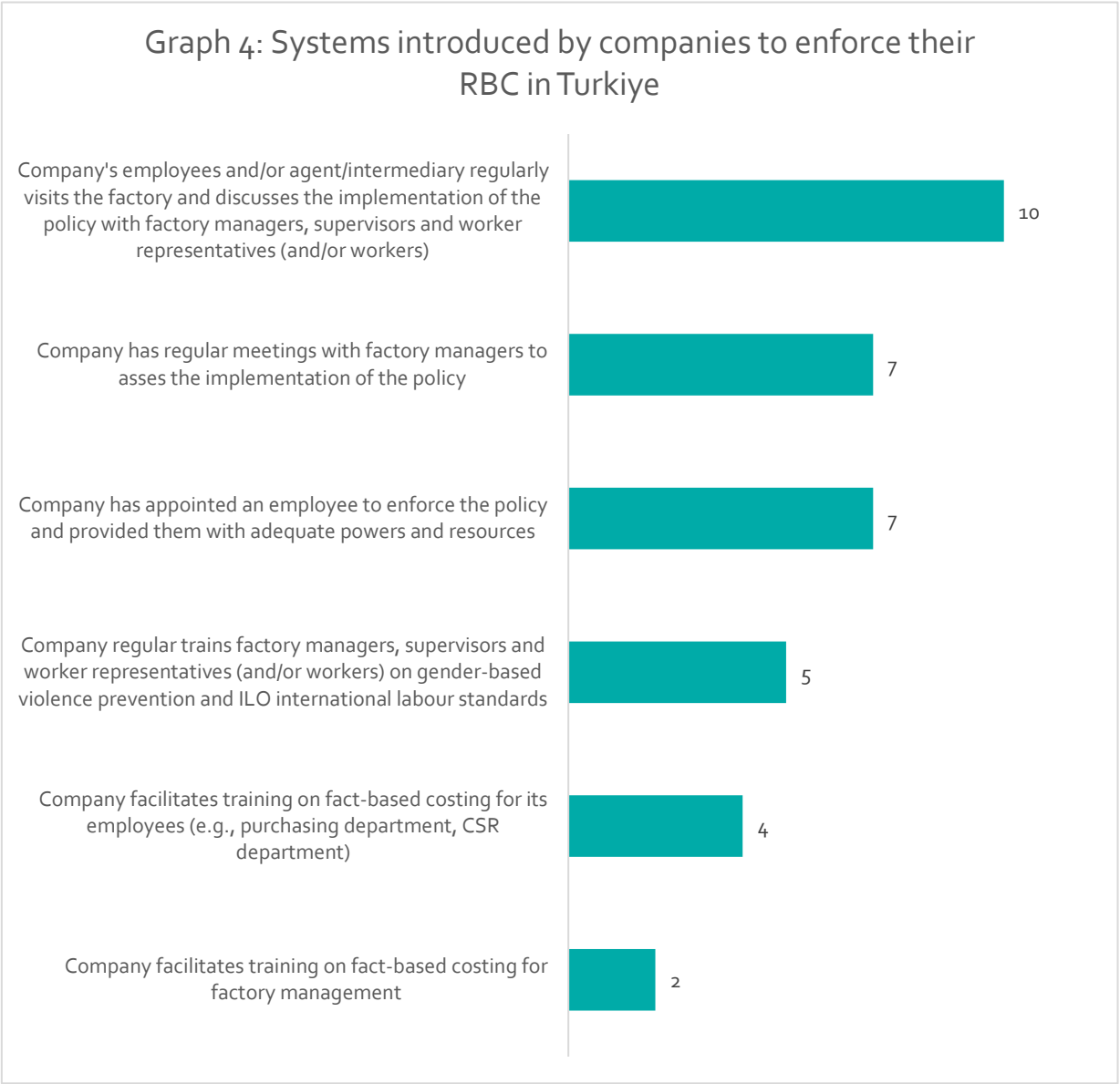


As Graph 4 shows, most of the brands stated that they have introduced multiple mechanisms to implement their RBC policy in Türkiye in collaboration with their Turkish suppliers. The three most commonly used systems are:

A brand/company representative and/or agent/intermediary regularly visits the factory and discuss the implementation of the policy with factory managers, supervisors and workers’ representatives (and/or workers).

The brand/company has regular meetings with factory managers to assess the implementation of the policy.

The brand/company has appointed an employee to enforce the policy and has provided them with adequate powers and resources.



With regards to the relationship between brands with agents and intermediaries, Table 1 shows that the majority of brands work through agents and intermediaries. Only six of the brands preferred not to work with agencies or intermediaries and always contact suppliers directly.

Table 1: Relationship of the brands with agents and intermediaries

Relationship of brands with agents and intermediaries	N
Both, the company works with agents and has also direct relationships with suppliers	9
No, the company prefers to have direct relationships with suppliers	6
Yes	5
Total	20

The results in Table 2 and Table 3 show that intermediaries and agents play an active role in the supply chain. The major roles of agents and intermediaries are negotiation and communication, locating suppliers, and quality inspections. Therefore, it is important to build the capacity of intermediaries and agents on social sustainability and to share RBC policies with them in detail.

Table 2: Role(s) of agents/intermediaries which they play on behalf of brands

Role(s) played by agents/intermediaries	N
Negotiation and communication	12
Locate suppliers	11
Quality inspections	11
Oversee production	8
Assess production capacity	7
Import and export paperwork	7
Logistics and shipping	7

Table 3: Obligations for the agents/intermediaries in relation to implementing the 'Supplier Code of Conduct' or RBC policy.

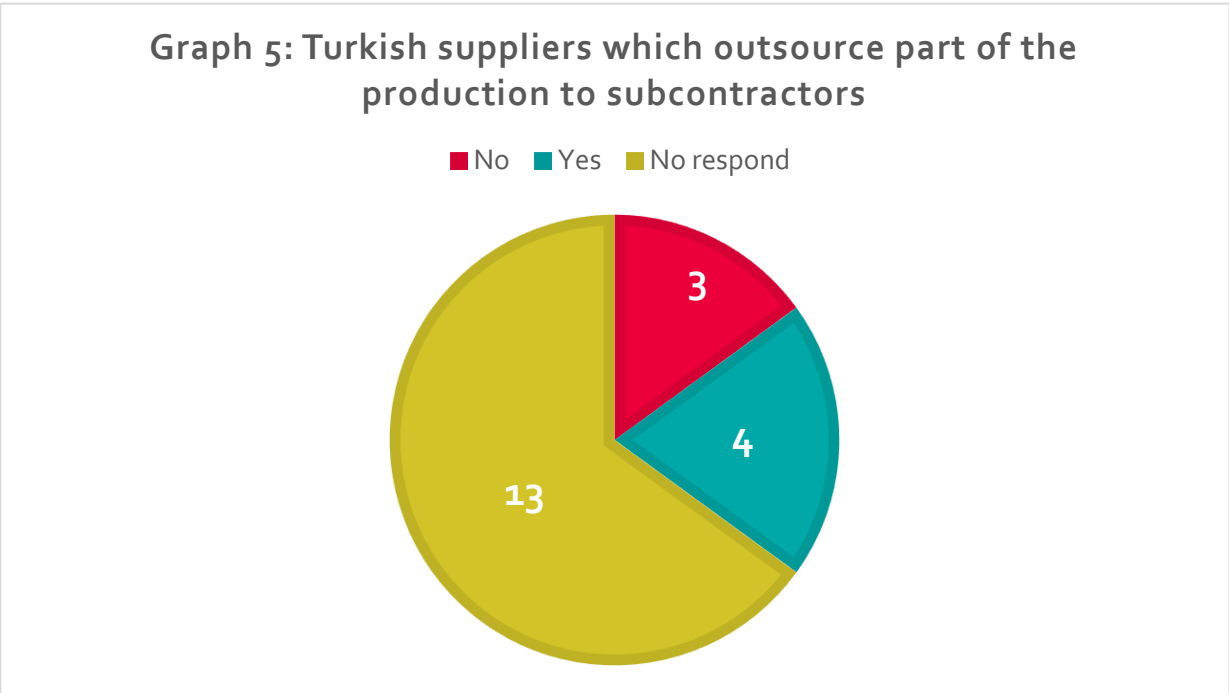
Obligations of agents/intermediaries	N
Visit factories and assess labour rights	7
Train management on labour rights	1
Ensure buying prices support legal minimum wage	4
No obligations	2
No response	2

A further issue is the extent to which agents/intermediaries are required to address labour rights and conditions in factories and/or to provide training to managers/supervisors/workers on labour rights. As seen in Table 4 brands were asked how they ensured that representatives/agents were enabled to or had sufficient capacity to assess labour rights conditions in factories and/or train suppliers on labour rights. Some brands require agents/intermediaries to be trained in international and/or national labour standards, while others require them to prove their competence in this regard. However, those who appear to have this competence on paper may not have the competence to audit labour rights in-depth and/or the capacity to provide training that can change the culture of a workplace.

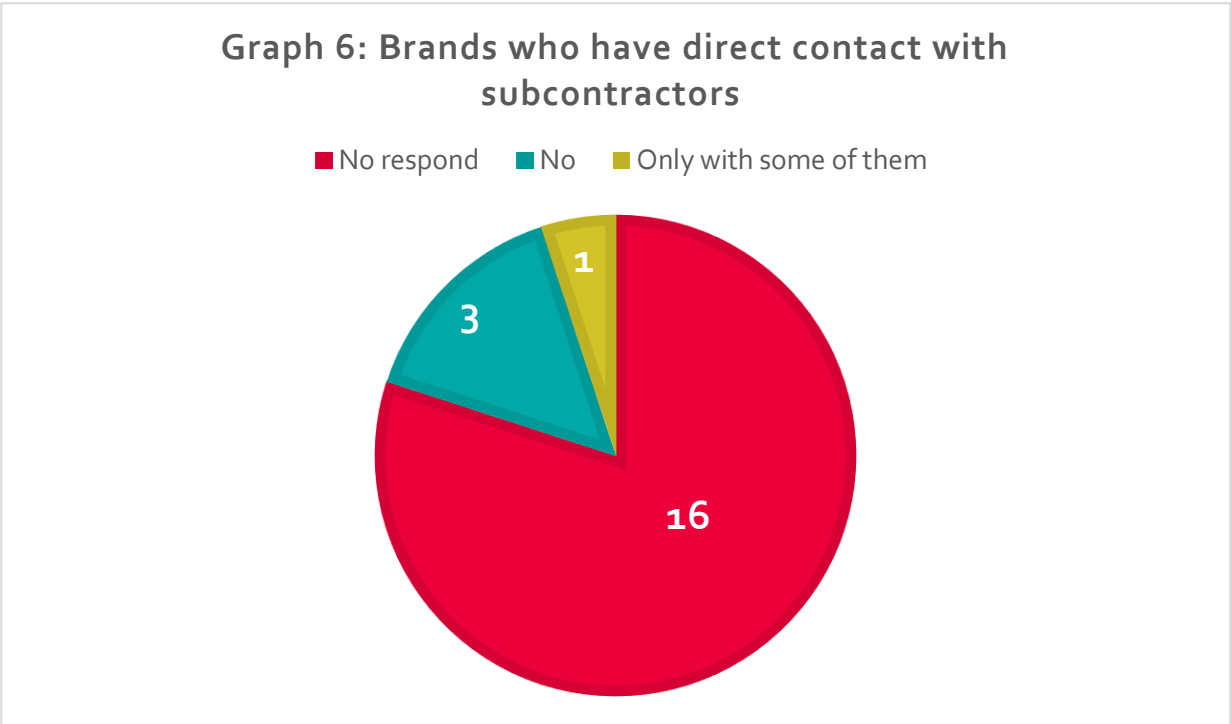
Table 4: Requirements for agents/intermediaries

Requirements for agents/intermediaries	N
They are required to attend trainings on international labour standards	9
They need to prove their knowledge of international labour standards	5
They need to prove their knowledge of national labour laws	4
They are required to attend trainings on national labour laws	4

In relation to outsourcing, only three respondents gave a negative answer to the question of whether their suppliers outsource part of the production to subcontractors, as seen in Graph 5. Four companies responded positively, and thirteen companies did not provide any response. Indeed, in the parallel survey conducted with suppliers, it appears that suppliers subcontract some parts of their productions for various reasons.



Even where subcontracting takes place, only one of the twenty surveyed brands stated that they had a direct contact with subcontractors, as illustrated in Graph 6.



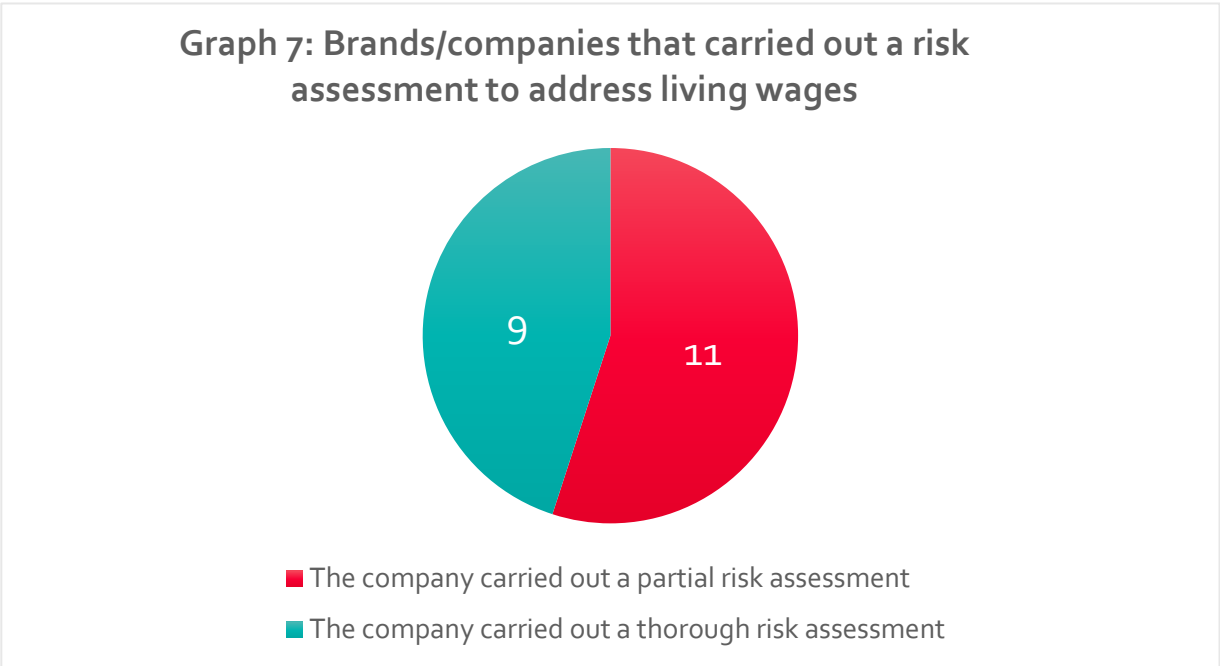
Only one brand responded to the question about subcontractors’ roles, while nineteen out of twenty brands did not respond to the question ‘how do you ensure that these subcontractors prevent gender-based violence and pay at least the legal minimum wage?’. The one respondent stated that the company reviews third-party audits before starting a business relationship with a subcontractor or arranges for a representative to inspect the subcontractor facility before starting the business relationship to check general working conditions. This brand also stated that all subcontractors are required to sign their ‘Supplier Code of Conduct’ at the start of the business relationship.

However, the further down the supply chain, the more violations of the labour rights are encountered. At each link in the supply chain, wages are lower, working hours are longer and working conditions are more challenging. It is therefore not sufficient for brands to merely audit and support their own suppliers to ensure a production process that respects labour rights. It is necessary to ensure the same throughout the supply chain.

3.2 BRANDS' POLICIES CONCERNING A LIVING WAGE

It is crucial for brands to integrate the living wage into their purchasing policies. Otherwise, price competition between suppliers results in a race to the bottom in wages.

Brands were also asked about their policies on living wage. While eleven brands/companies carry out a partial risk assessment, nine stated that they carried out a thorough risk assessment to address (wages below) living wages in the Turkish context, as illustrated in Graph 7.



Thirteen out of the twenty brands' RBC policies cover living wage. Two other brands stated that they adopt the Fair Wear Code of Labour Practices even though their RBC does not cover the living wage. Other brands have not yet integrated the living wage arrangement into their RBCs or do not have RBCs, although they are working towards this goal. The prominent comments on the living wage are given in the Table 5.

Table 5: RBC policies concerning living wage

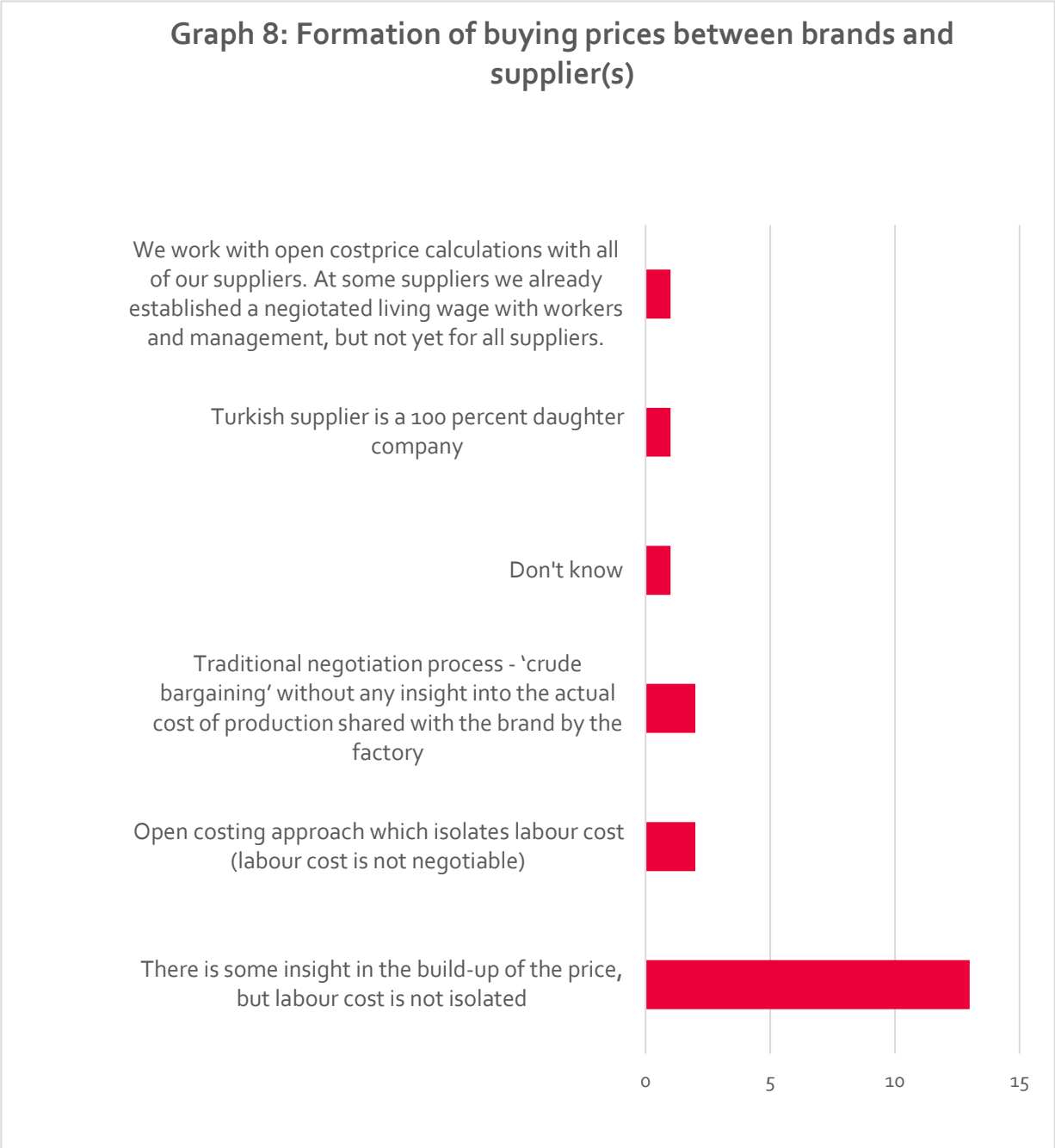
- C4** *Wages and benefits paid for a standard working week shall meet at least legal or industry minimum standards and always be sufficient to meet basic needs of workers and their families and to provide some discretionary income. Deductions from wages for disciplinary measures shall not be permitted nor shall any deductions from wages not provided for by national law be permitted. Deductions shall never constitute an amount that will lead the employee to receive less than the minimum wage. Employees shall be adequately and clearly informed about the specifications of their wages including wage rates and pay period.*
- C15** *Reducing greenhouse gas emissions, transparency along our value chain and the payment of a reasonable living wage for workers are areas on which we have placed our focus. We (...) encourage our supplier comply with regulations of minimum wages and working hours and ensure a living wage according to local living conditions.*
- C16** *We aim to provide at least minimum wages; however, our goal is to pay all our workers living wages so that they have sufficient means to pay for their needs. As a step in between we try to reach target wages which we set with our suppliers, and we also try to integrate the worker representatives as well. Unfortunately, this is not that easy because our ambitious attempts are often stopped by rising inflation as well as lack of resources as energy and raw material because of which the prices are rising. COVID-19 did slow down this process too. Furthermore, excessive working hours as well as excessive overtime are something we do not promote. Working hours should comply with industry standards as well as applicable laws. Every seven-day period workers should have at least one day off. Additionally, they should not work more than 48 hours per week. Moreover, overtime should be voluntary and should not be more than 12 hours a week.*
- C19** *Our aspiration are reasonable wages for the people who work for us and manufacture our products. Reasonable wages cover at least the basic needs including an additional amount for discretionary expenses. Any overtime worked must be compensated in accordance with the statutory requirements at minimum. The statutory social security obligations must be carried out. Deductions from wages for the purposes of disciplinary measures or other illegal wage deductions are prohibited. Every employee must be provided with a pay slip of the exact calculation of their wages (including deductions and allowances). Furthermore, it must be ensured that employees are able to understand and comprehend their pay slips.*

Brands were asked to select the true statements regarding the living wage, as shown in Table 6. The most divergent response was on the issue of brands paying workers, on the basis that brands do not pay workers, but they are decisive in determining the retail value of a product, which is an important variable for 'wage levels'. A further statement related to the relationship between overtime and earnings, on the basis that a living wage is earned for standard working hours, and not through overtime work. On the contrary, the reality is that when workers cannot earn a living wage, they are often trapped into working excessive overtime in order to sustain themselves and their families.

Table 6: Statements on living wage that are true or false

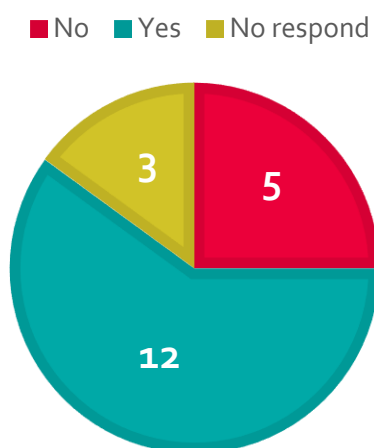
Statements on living wage that are true or false	True	False	Total
A living wage should be paid for a standard working week (excluding overtime)	19	1	20
Workers and their unions should be involved in drawing up any living wage estimate	18	2	20
Following the OECD Guidelines and the UN Guiding Principles, brands have an obligation to pay prices which enable factories (employers) to pay living wages to their workers	18	2	20
Brands do not pay workers	8	11	19
Workers can earn a living wage by working overtime and performing well enough to earn performance-related bonuses	4	16	20
The legal minimum wage in garment-producing countries is usually the same as the living wage	0	19	19
The government decides what the living wage in a country is	0	19	19

As displayed in the Graph 8, nine of the twenty brands responding to the survey stated that they do not know how their buying prices are related to wage levels in Turkish factories. Aside from this, thirteen out of twenty companies said that they had some insight in the formation of the price, but that labour costs were not identified as an isolated cost. However, it is very important to establish a relationship between buying prices and wages to ensure a living wage. It is recommended that brands work on this issue.



Twelve of the twenty companies have adopted a 'Strategy/ Roadmap to Increase Wages in their Supply Chains in Türkiye' (Graph 9).

Graph 9: Brands that have a strategy to increase wages in the supply chain in Türkiye



Brands' strategies to raise wages in their supply chains in Türkiye can be found in seven. Half of the brands stated that they set a target wage for their production locations.

Table 7: Strategy/roadmap of the companies to increase wages in the supply chain

What does your strategy/roadmap include to increase wages in your supply chain?	N
The company has set or will set a target wage for its production locations	10
The company has analysed or will analyse the cost implications of higher minimum or target wage	9
The company has analysed or will analyse the labour cost required to produce its goods	8
The company has facilitated or will facilitate training to factory management to better understand their costs, including labour costs (e.g., Fair Price App)	7
The company has consulted or will consult with local trade unions, workers' representatives, and factory management to set a target wage for a factory of a cluster of factories	5
The company is cooperating or will cooperate with other factory clients to set a target wage and finance it	5
The company has invested or will invest in its internal efficiencies to finance wage increases (e.g., operational efficiencies lead to cost savings)	4
The company has increased or will customer prices or has reduced or will reduce margin to finance living wage	4

Only five brands responded that they request that Turkish suppliers sign a 'Supplier Code of Conduct'; fifteen brands did not give a response. However, signing a detailed supplier code of conduct with suppliers and supporting them to comply with this code of conduct is an important step to improve the working conditions and wages of workers in the supply chain.

Brand representatives see hyperinflation, transparency and low leverage as the most important barriers for achieving a living wage in the Turkish supply chain. One of the respondents expressed the problem they experienced in terms of transparency with the following words:

'Our challenge at our biggest supplier is lack of transparency, which gives room for mistrust. We need to work on this issue, so we have a base to work on real social dialogue and have impact at the facilities. At the other suppliers we have in Türkiye, we have a low leverage, which makes it a little harder to start this work. But on the other side, we experience openness for this approach'.

Brands experience a range of challenges in achieving living wages, a selection of which can be found in Table 8. Common challenges include rising inflation, lack of transparency and capacity issues.

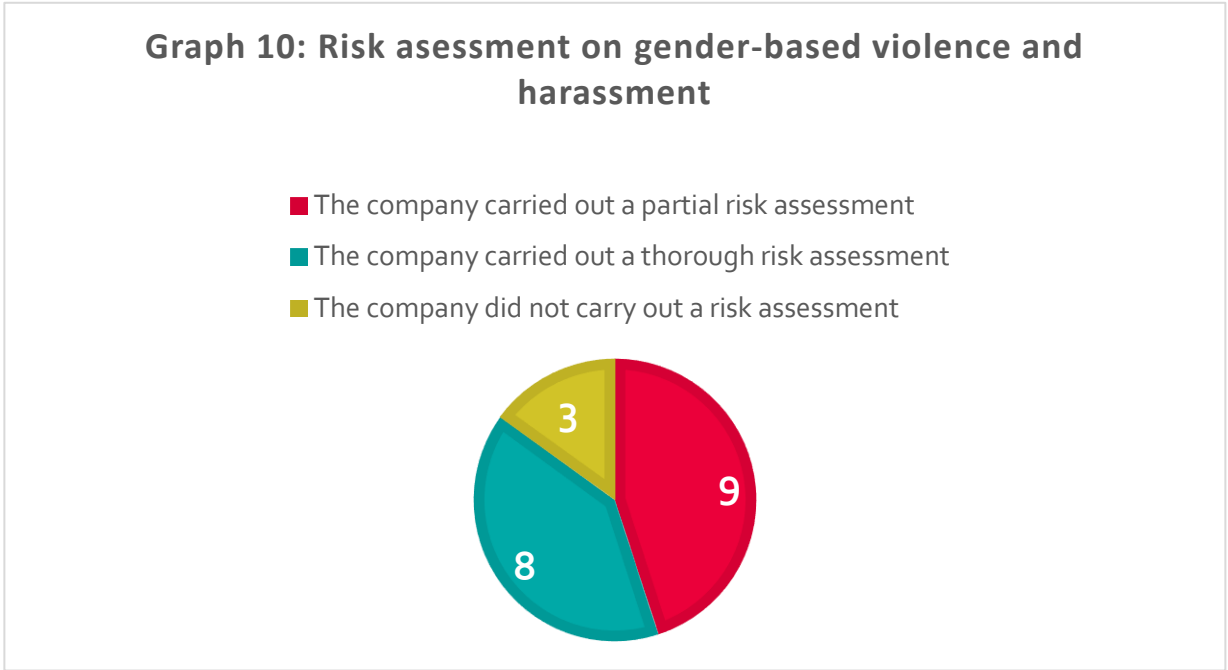
Table 8: Obstacles to achieving living wages

The three most challenging obstacles to achieving living wages in brands' supply chain in Türkiye	
C1	High inflation for the moment with changing conditions every month. Low leverage with one of the factories No other companies to cooperate with in one of the factories
C2	In-house capability in verifying labour minute values, minutes and efficiencies provided by the supplier. Transparency/trust with supplier-brand that supplier will quote same labour minute value to all brands Supplier facing competition with other factories in the region due to wage levels
C3	Lack of information on costing Subcontracting High material prices
C4	Transparency Openness for opening costing from suppliers Extreme inflation
C5	Because of inflation and high fluctuation of the minimum wage it is difficult to monitor living wage level
C6	Double bookkeeping; reluctance/scepticism for open costing by factory; Brand's purchasing practices
C7	Economic situation in Türkiye
C8	High inflation in Türkiye, low margins as a sustainable company, keep competitive prices
C9	High inflation, political instability, rather small leverage in the factory
C10	Hyperinflation, having not enough leverage, increasing our wholesale/retail prices as margins are slimmer due to the fact that all costs are rising
C11	Inflation, economic situation
C12	Lack of transparency / Settlement of social security
C13	Little Leverage; Non-transparent price calculations and production planning; Too high prices for the end consumer
C14	Low insights into garment price calculation, no direct contact to factories, low leverage
C15	Low leverage at some facilities, difficult to cover a living wage if other brands may not be involved, relatively new factories, still working on trust and stable partnerships and orders (big risk for suppliers to increase wages).
C16	Suppliers afraid due to other suppliers nearby - Turkish taxes
C17	The inflation and stability at our suppliers
C18	Transparent costing: other sourcing brands that are not contributing, impossibility to check that higher payment for labour go to workers
C19	Understand living wage costs as part of the costing price. Consequences of higher wages if our leverage at the factory is small. Workers moving to a different company if the wage is higher there: suppliers know the average wage paid in the area.

3.3 BRANDS’ POLICIES CONCERNING GENDER-BASED VIOLENCE AND HARASSMENT

The second thematic focus of our research is gender-based violence and harassment. In the following subsection, the RBC policies of brands regarding gender-based violence and harassment and their advantages and disadvantages in the Turkish supply chain are analysed.

While eight of the brands stated that they carried out a thorough risk assessment, nine only carried out a partial risk assessment to address risks of gender-based violence in the Turkish context. Three of the companies did not carry out any risk assessment.



Of note is that eleven of the brands’ RBC policies cover gender-based violence and harassment. It was observed that gender-based violence and harassment, discrimination, and gender equality issues are often addressed together in the RBC policy. The remaining respondents either stated that they were working to integrate gender-based violence and harassment into their RBC policies or referred to gender equality provisions in their RBC policies. Table 9 illustrates the main responses regarding brands’ policies on gender-based violence and harassment.

Table 9: Gender-based violence in the brands' RBC policy papers

- C1** *It is defined as 'harms that are perpetrated against a person or group of people because of their factual or perceived sex, gender, sexual orientation and/or gender identity'*
- C4** *No sexual harassment and sexual and gender-based violence (SGBV) in the workplace: Our business partners are encouraged to adopt a zero-tolerance policy on sexual and gender-based violence and strict measures against sexual harassment in its own operations. The enterprise should articulate its expectations of suppliers and other business partners to likewise adopt a policy on sexual harassment and sexual and gender-based violence. Enterprises are encouraged to include the following in their internal policies: - A commitment to foster an environment at work free from harassment*
- C15** *We support the protection of internationally proclaimed human rights, fight forced and child labour, uphold gender equality, encourage our supplier to establish the freedom of association and right to collective bargaining, provide a workplace free of harassment and unlawful practices of discrimination, comply with regulations of minimum wages and working hours and ensure a living wage according to local living conditions.*
- C16** *Women in this industry are at a constant risk including occupational segregation, gender-based discrimination upon recruitment, gender wage gap, sexual harassment, excessive overtime, lack of Trade Union representatives, among others. We want to protect women's human rights and eliminate discrimination against women to achieve gender equality. Additionally, we contain our gender lens in all our policies. C16 Textile is committed to providing diverse and equal employment opportunities to everyone, regardless of their gender, race, ethnic origin, disability, age, nationality, sexuality, religion or belief, marital status or social status... One of our steps to prevent gender inequality and put the focus on human rights and their adherence are our annual audits as well as constant contact with our suppliers, onsite visits and long and permanent partnerships which help us to build a trusted environment.*
- C17** *We acknowledge and respect our employees' human rights. [...] we commit ourselves and those we work with to the following principles: [...] Prohibiting gender-based violence or harassment, including sexual harassment.*
- C19** *C19 does not tolerate any kind of gender-based violence. C19 sets a zero-tolerance policy in its own organisation, supply chain but also at suppliers and customers. C19 collects gender specific data from direct partners (tier 1) to identify potential risks in an early stage. XXX examines each country in an extensive risk analysis regarding gender justice and a potential injustice. This is openly discussed with the suppliers. All human beings must have the same chance of a safe work environment as well as appropriate wages and the chance to further education.*

In the question with the responses given in the Table 10, respondents were asked to select which of the following statements about gender-based violence were true. The answer to the first five questions must be true and the answer to question six must be false. In the first question, one brand representative marked the false option, and one did not answer. Although the gender-based violence is largely male-patterned, it affects women, men, and gender non-conforming individuals. Although gender-based violence and harassment occurring in the workplace includes commuting to and from work and employer-provided accommodation, one of the respondents chose the false option on this issue. It is important to note that gender-based violence and harassment in the world of work can take place in the workplace as well as in the home, in public places, in employer-provided housing, in commuting to and from work and in cyberspace. Moreover, domestic violence is also a workplace issue. Gender-based violence is usually perpetrated by persons who hold a position of power or control over other individuals. However, sometimes the perpetrators of violence can also be employees in equal positions or third parties.

Table 10: True and False Statements about gender-based violence

Please select which of the following statements on gender-based violence are true.	True	False	No response
1. Gender-based violence affects women, men, and gender non-conforming individuals	18	1	1
2. Gender-based violence means violence and harassment directed at persons because of their sex or gender or affecting persons of a particular sex or gender disproportionately and includes sexual harassment	20	0	0
3. Sexual harassment includes physical, psychological, verbal and non-verbal conduct	20	0	0
4. Gender-based violence and harassment occurring in the workplace includes commuting to and from work and employer-provided accommodation	19	1	0
5. Gender-based violence is usually perpetrated by persons who hold a position of power or control over other individuals	14	5	1
6. Gender-based violence and harassment occurring in the workplace includes only the physical workspace areas where workers are paid	1	19	0

In relation to implementing a strategy/roadmap to reduce gender-based violence and harassment, only three brands had established a strategy/roadmap for this purpose in their supply chain that includes or applies to Türkiye. As can be found in Table 11, questions regarding the strategy/roadmap of the brands to reduce gender-based violence and harassment in their supply chain relate primarily to production processes. They include timely approval for bulk production, knowledge of the supplier's production capacity, good production planning shared with suppliers in a timely manner, and checking if the factory's production targets are realistic in order to address work pressure and prevent excessive overtime work and working under pressure. Thus,

gender-based violence and harassment caused by production under pressure and excessive overtime can be avoided. However, these practices are implemented by, at most, three brands. In practice, it will be possible to combat gender-based violence and harassment when all these practices are implemented decisively and holistically.

Table 11: The strategy/roadmap of the brands to reduce gender-based violence in their supply chain

Actions introduced in strategy/roadmap on gender-based violence and harassment H	N
Establish a Supplier Code of Conduct with zero tolerance for gender-based violence	3
Timely approval for bulk production	3
Ensure the inclusion of gender-based violence related questions in audits	3
Knowledge of the supplier's production capacity	2
Gender-based violence prevention training for supervisors and factory management	2
Support social dialogue at the factory level and engagement with trade union representatives and/or workers' representatives	2
Clauses on gender equality, complaints mechanisms and gender-based violence prevention are included in (written) contractual agreements with suppliers	2
Build worker's awareness of gender-based violence	2
Good production planning shared with suppliers in a timely manner	2
Check if the factory's production targets are realistic	2
Analyse gender-based violence and related risk factors across its supply chain	1
Gender-based violence prevention training for workers	1
Negotiated and legally binding agreements between the company, trade union and suppliers on preventing and remediating gender-based violence	1

Among the main risk factors related to gender-based violence and harassment in the supply chain in Türkiye, the most frequently mentioned by the brands are structural inequalities which are deeply rooted in Turkish culture, gender power inequalities, male dominance among supervisors and managers, and non-unionisation. These findings are confirmed by the related literature (Dedeoğlu, 2000; Eyüboğlu et al. Özar&Günlük-Şenesen, 1998; İlkaracan, 1998; Palaz, 2005; Toksöz, 2009, Özçatal, 2011). However, brands have tools to prevent these risk factors and the workplace can be an important arena for transforming the dominant cultural structure. Brands can transform the unequal cultural structure in the workplace through trainings and projects, as well as codes of conduct signed with suppliers. Gender awareness and gender-based violence and harassment training for managers, supervisors and workers can facilitate change and the breaking of the glass ceiling. However as displayed in Table 11, only two brands provide gender-based violence prevention training

for supervisors and factory management, and only one of them for workers. Moreover, only three brands have established a Supplier Code of Conduct with zero tolerance for gender-based violence and harassment and two have integrated clauses on gender equality, complaints mechanisms and gender-based violence prevention in (written) contractual agreements with suppliers. To sustain cheap labour, union hostility is widespread especially in low value-added industries such as the garment industry. Brands transforming their purchasing practices to ensure that workers receive a living wage and supporting unionisation of workers can transform this structure. Table 12 shows the responses from brands.

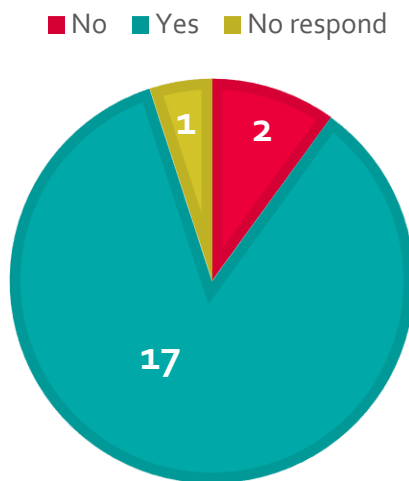
Table 12: Opinions of brands regarding the three main risk factors associated with gender-based violence in their supply chain in Türkiye

	Risk factors
C1	Many female workers with male managers
C2	Overtime hours can lead to increased chances of gender-based violence Purchasing practices of the brand Subcontracting
C3	Women are a minority in the Turkish workforce 92 per cent of women are not members of unions, Cultural norms
C4	Women being able to perform only a certain type of work OHS for pregnant or recently given birth workers Gender-based harassment at workplace
C5	Awareness, Openness to identify/discuss/improve Lack of tools/expertise
C6	Being ashamed to talk about it The feeling that complaints are not solved
C7	Culture Management is mostly male
C8	Female workers often are unregistered Many women face domestic violence
C9	Freedom of expression / assembly / thoughts
C10	In our tier 1 there is a healthy mix between men and women on powerful places, open minded management
C11	Invisibility in audits

	Culture (how it is perceived by the people in the country, e.g., shame, acceptance) Inequality between men and women.
C12	Low-income employment Unequal status of men and women Production pressure (overtime etc.)
C13	Men dominated supervisors Religion
C14	Mostly men in management positions Often no active trade union
C15	The equal treatment of all genders
C16	Turkish culture Predominantly powerful male supervisors High fluctuation in the supervisors/management department
C17	Unequal opportunities and payments Gender based violence
C18	Wages Discrimination Racism
C19	We have conducted an anonymous worker sentiment survey and it showed 35 per cent are affected from verbal abuse; eleven per cent are affected from physical and verbal sexual harassment and 44 per cent don't feel that women and men are treated equally.

Of note, is that thirteen of the twenty brands' RBC policies include access to remedy and/or provide factory workers with a gender-sensitive grievance mechanism. Despite these measures, workplace pressure, fear of gossip, victim-blaming, patriarchal culture, and lack of gender-sensitive complaint mechanisms render gender-based violence and harassment in the supply chain invisible. As a result, brands need to introduce pro-active and more stringent measures to combat gender-based violence and harassment and ensure living wage in their supply chains, design training and programmes, and create support mechanisms. Furthermore, they should also establish a system in place to track and remediate complaints related to gender-based violence and (living) wage in their supply chains. It is satisfactory that seventeen out of twenty brands have such a system, as seen in Graph 11.

Graph 11: Brands' systems to track and remediate complaints related to gender-based violence and (living) wage in the supply chain in Türkiye

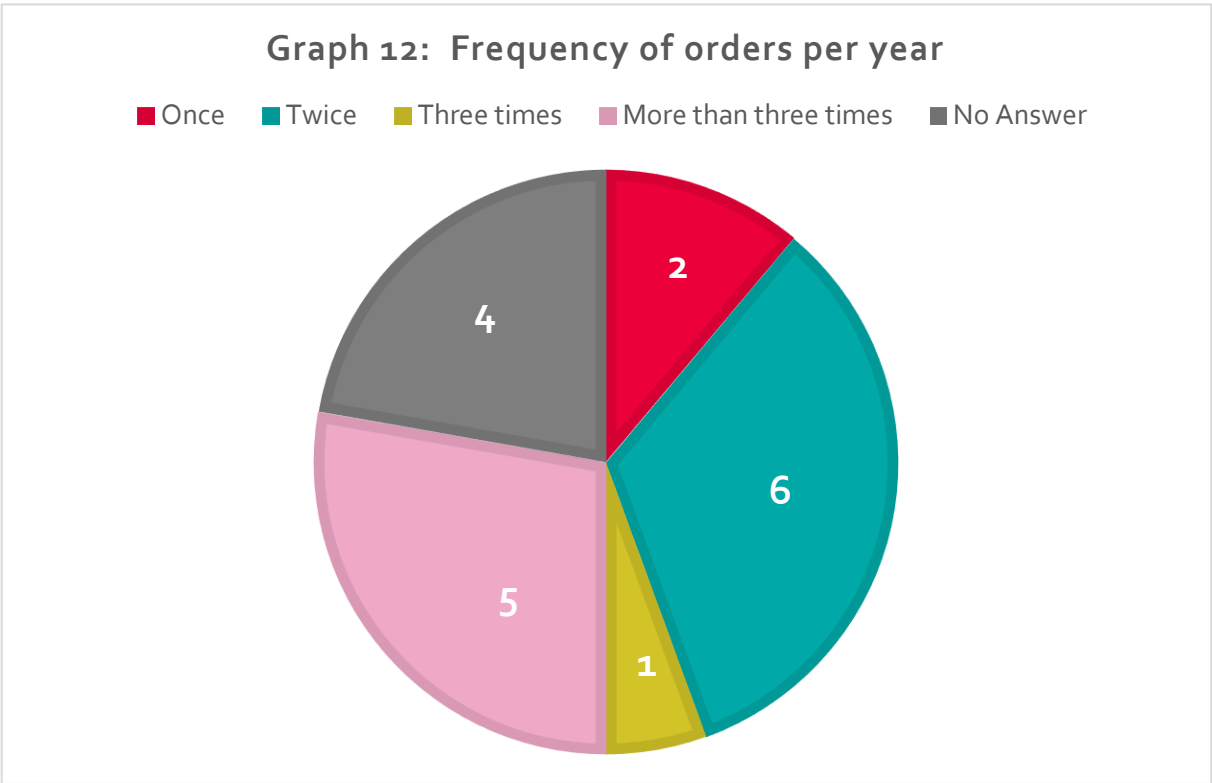


4. ANALYSIS OF THE SURVEY WITH THE SUPPLIERS

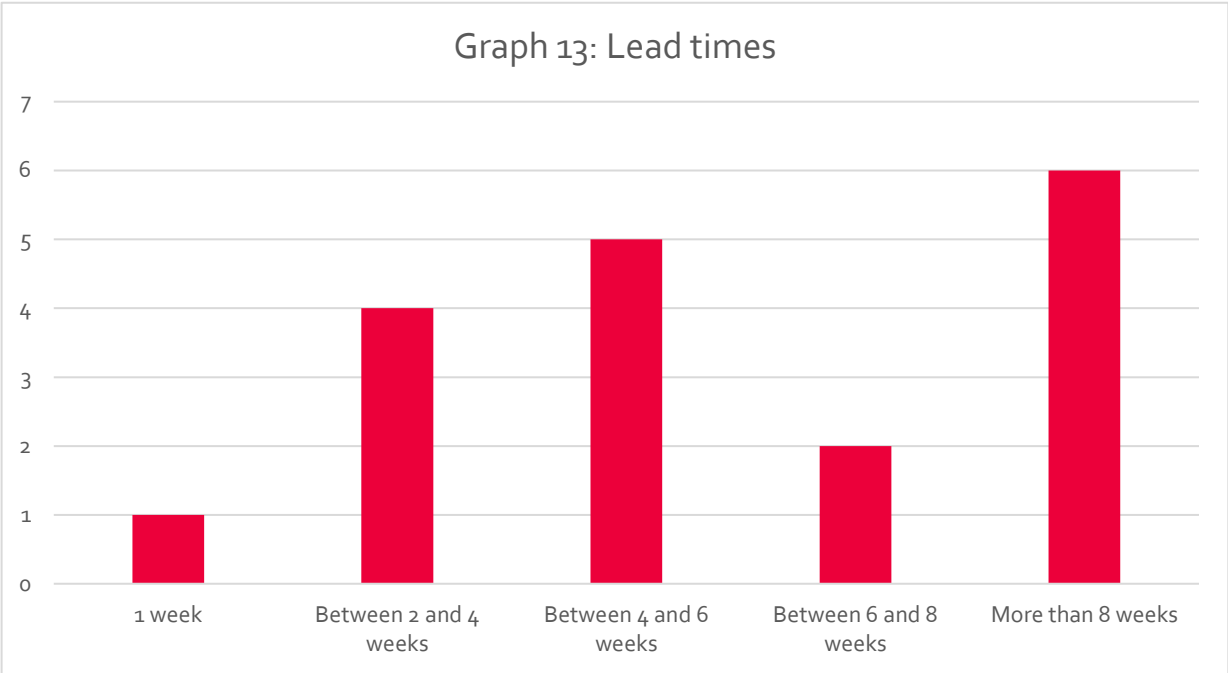
A total of eighteen suppliers producing for Fair Wear member brands participated in the survey conducted with suppliers to assess their policies and practices on living wages and gender-based violence and harassment. Only one of the eighteen suppliers stated that the Fair Wear member company(s) invest in his/her factory in one way or the other. Others stated that there is no investment.: *'We are given products for contract processing, and we receive our payment after the transactions are made, so there is no investment'*

4.1 RELATIONSHIP WITH THE BRANDS

Only four of the eighteen suppliers stated that they did not get regular orders. Fourteen of the suppliers stated that they get regular orders, while twelve of the eighteen suppliers stated that the volume of orders was more or less the same over time/the past years, allowing them to plan production ahead. Regular orders are crucial for ensuring formal employment, job security and a living wage for workers. If orders are irregular there is an increased tendency for suppliers to subcontract production, employ casual workers and lay off workers when orders are scarce. Graph 12 shows that twelve of the eighteen suppliers receive two or more orders per year.



While thirteen suppliers have a lead time of more than four weeks, one supplier stated that they had a very short normal lead time of only one week, as illustrated in Graph 13.



All but two suppliers stated that international brands regularly share and negotiate their production plans with them, as shown in Graph 14. This negotiation is very important for the stability of the workers employed by the suppliers. Thus, practices such as dismissal, subcontracting and excessive overtime can be mitigated.

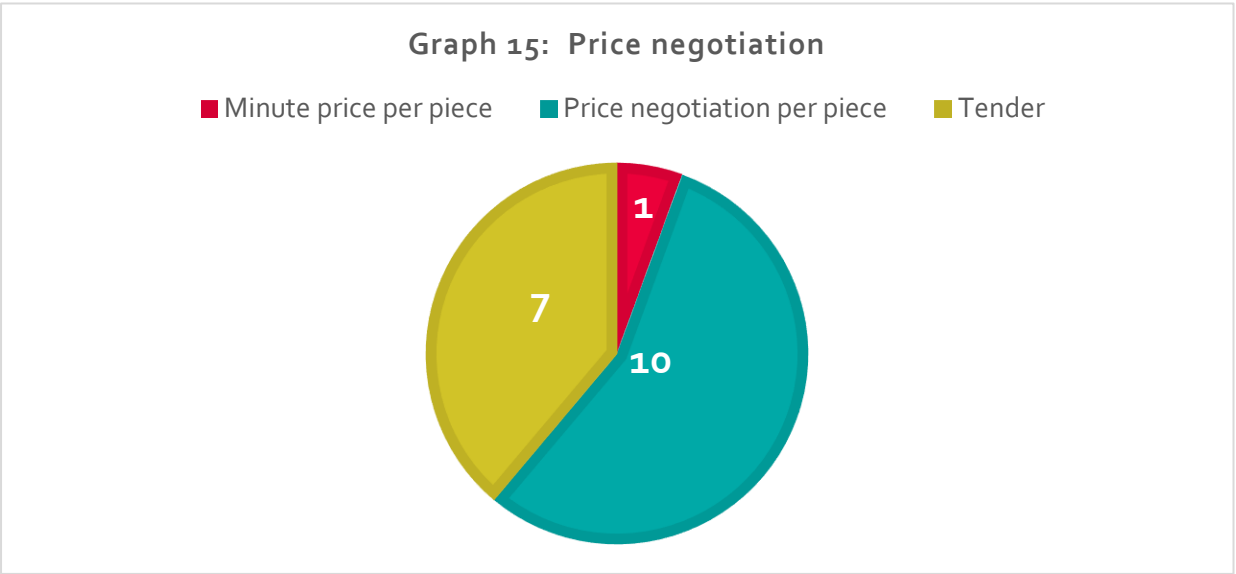


All the suppliers stated that the samples and designs are confirmed on time, 13 suppliers stated that they have sufficient time for production, while 5 suppliers stated that they 'sometimes' have sufficient time. As seen in the Table 13, the most common practices in case of failure to meet delivery dates are penalties and price reductions.

Table 13: Cases of missing delivery dates

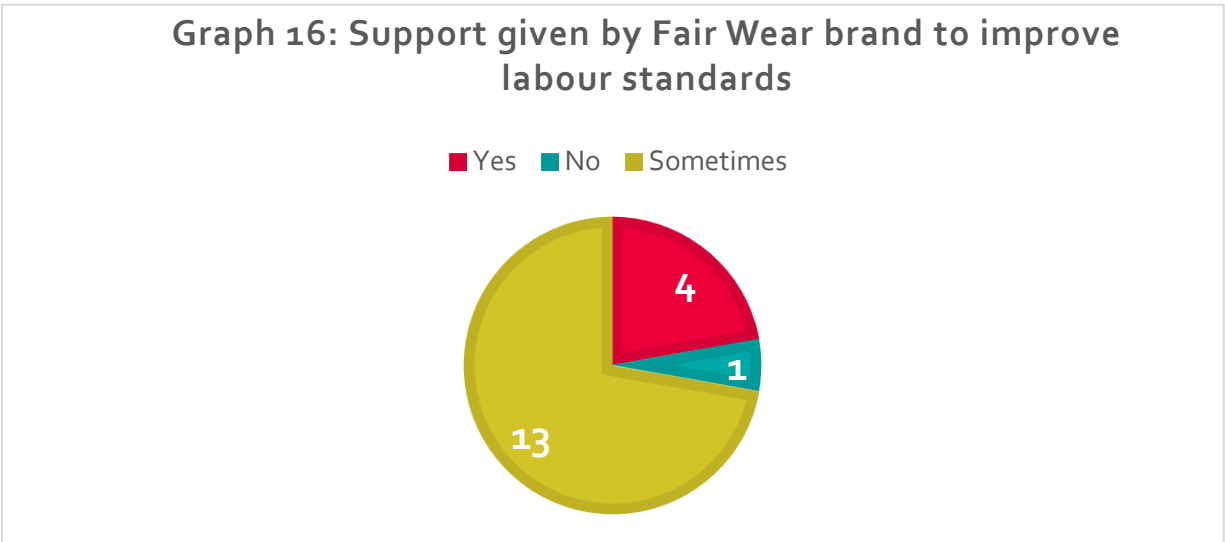
What happens in case you cannot meet delivery dates?	N	
Customer may ask us to ship the goods by air	1	
We have not encountered such a situation yet.	1	
Depending on the customer negotiation, sometimes the price decreases, but generally there is no problem.	1	
Other	6	Five per cent reduction on garment order price and airfreight shipment at factory cost
		Mostly there is no claims, but we have experienced a decrease in the number of subsequent orders.
		If the order is to be sent later than the deadline, it is agreed with the customer and loaded on the appropriate date without any penalty.
Penalties	3	
Price decrease	5	
Reject	1	

In relation to price negotiation, Graph 15 shows that ten out of eighteen suppliers negotiate prices on a piecework basis. Only one company applies minute price per piece cost. However, calculating labour minute cost is an important tool to access the living wage.

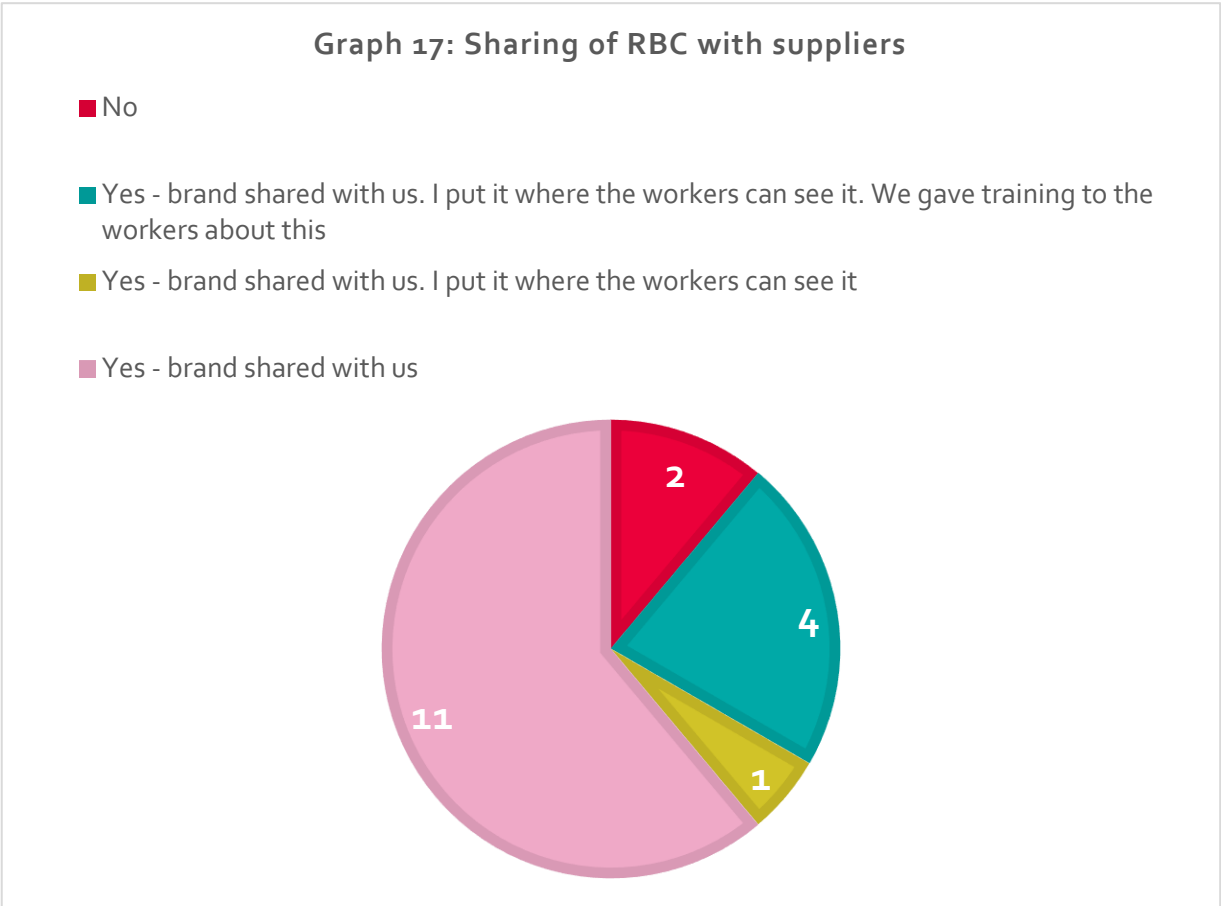


Regarding payment of invoices, seventeen of the eighteen suppliers stated that the Fair Wear member brands pay invoices on time. Average invoice term payment days of the Fair Wear member companies are 23 days. Only for two suppliers, the invoice payment terms are more than 45 days.

Only four of the suppliers stated that the Fair Wear member brand supported them in improving their labour standards in line with international labour standards. They stated that these supports were mainly provided by conducting audits or generating and discussing ideas to resolve problems.



One way to ensure this is by sharing brands' RBC policies. Fair Wear member brands shared their RBC policies with sixteen of the suppliers, as shown in the Graph 17. However, only four of them displayed the policy where it could be seen by workers and also gave training to the workers regarding the RBC. To be effective, the RBC should be shared with workers and adopted by all components of the supply chain through trainings, campaigns and other practices. It is otherwise likely to remain only on paper.

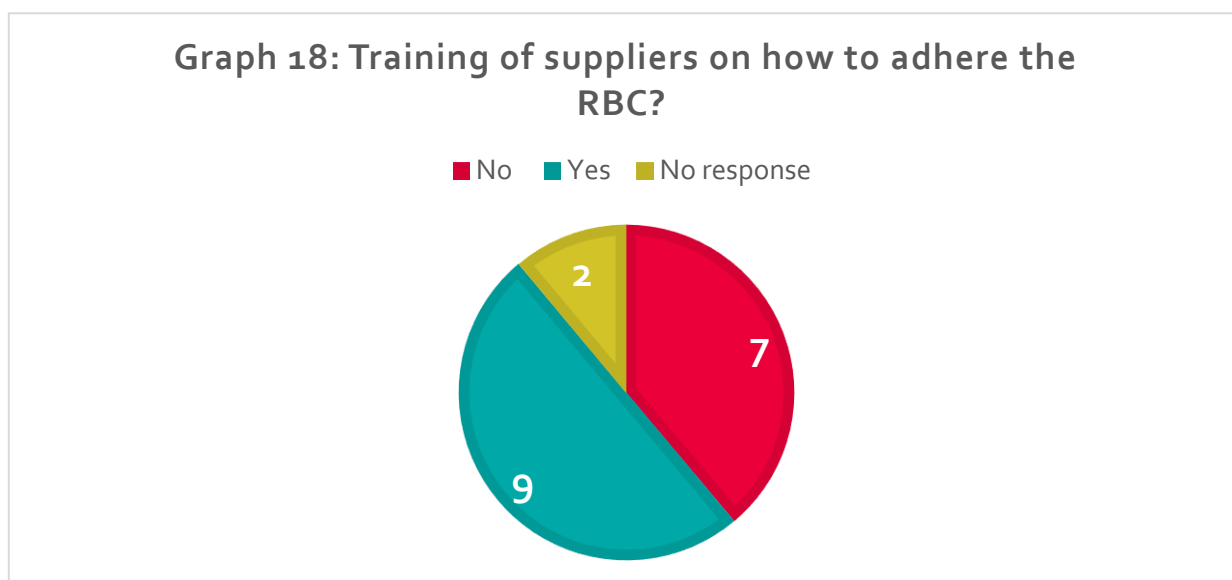


Overall, thirteen of the eighteen suppliers believe that the RBC policy is beneficial for their company. The most prominent of the beneficial effects of the RBC policy are the increase of the job satisfaction of employees, improvement of the occupational health and safety and better working conditions. Other beneficial effects are also displayed in Table 14.

Table 14: Beneficial effects of the RBC

In what ways does it have beneficial effects?	No
It increased the job satisfaction of the employees	11
It improved the occupational health and safety	11
It improved the working conditions of employees	10
It has enabled us to be preferred by international brands	5
It helped us take steps towards gender equality at the workplace	5
It enabled us to take steps towards environmentally friendly production	5
It helped us take steps towards the payment of living wage/the increase of wage	4
Trainings were given to managers and supervisors by international brands	1
Trainings were given to and employees by international brands	1

With regards to training, Graph 18 demonstrates that only half of the suppliers are trained by the brands on how to adhere the RBC policy. Nevertheless, in order for suppliers to internalise RBC policies, they need to understand its spirit, motivations and goals, the implications for the brand and for the supplier, and its meaning in terms of how it is grounded in labour rights.



4.2 SUPPLIERS AND LIVING WAGES

This section analyses the survey data on suppliers' wage setting and living wage. As seen in Table 15, the skills required for the job, experience of the worker, and difficulty of the job are the leading determinants in setting the wage level. Although the responses in the Table 15 indicate that the age or gender of workers does not play a role in wage determination, the survey of workers in supplier workplaces revealed that there is a gender wage gap.

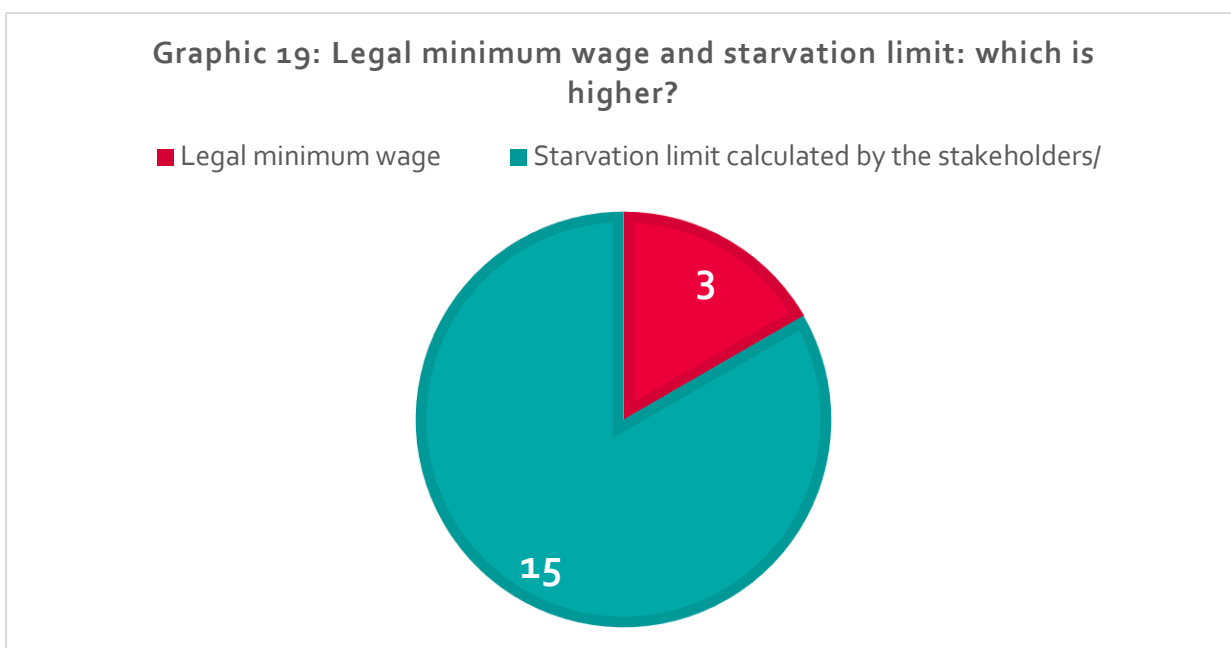
Table 15: Wage Determination Criteria

Which of the following criteria do you strictly observe in determining the wages?	Percent
The difficulty/effort of the job	83,3
Qualifications, education level or training required for the job/	61,1
Skill required for the job/	94,4
Experience required for the job/	88,9
Whether it is easy or not to find workers for that job/	22,2
Employee's seniority	44,4
The number of dependents of the employee	5,6
Gender of the employee	0,0
Age of the employee	0,0

The cost-of-living wage is based on the principle that workers and their families should lead a 'basic but decent lifestyle'. The cost of a basic but decent living for workers is calculated by considering the amount of expenditure required for food, shelter and other vital needs. The hunger line consists of the cost of a basket of basic food items required for a family of four to survive. Due to high inflation in Türkiye, the minimum wage is always below the poverty line and often below the hunger line. During the survey period, while starvation limit was €537,68 net,³⁴ legal minimum wage was €441,46. On the other hand, three respondents indicated that the minimum wage is higher.

³ This research paper has converted the amount from Turkish lira to Euro. The conversion rate on the date of conversion—28 November 2022—is 1 euro to 51,9 Turkish lira. Due to high inflation and the unstable Euro exchange rate, both the minimum wage and the purchasing power of wages are constantly changing.

⁴ <https://www.turkis.org.tr/turk-is-mayis-2023-acik-ve-yoksulluk-siniri>



Respondents were asked to indicate the correct answers related to several statements about the living wage. Although the minimum wage in Türkiye is always below the living wage level, six respondents stated that the minimum wage is at the living wage level. 11 respondents stated that the amount of living wage is determined by the government. The minimum wage determined by the minimum wage determination commission in Türkiye does not correspond to the living wage. Other responses can be seen in the Table 16.

Table 16: Statements on living wage

	True
The legal minimum wage in garment-producing countries is usually the same as the living wage	6
The government decides what the living wage in a country is	11
Workers can earn a living wage by working overtime and performing well enough to earn performance-related bonuses	13
A living wage should be paid for a standard working week (excluding overtime)	8
Workers and their unions should be involved in drawing up any living wage estimate	14
Brands do not pay workers	11
Following the OECD guidelines and the UN guiding principles, brands have an obligation to pay prices which enable factories (employers) to pay living wages to their workers	8

Only five of the respondents carried out a special action to implement the living wage in their workplace. Four of the respondents stated that they had conducted a survey in order to understand the expectations of employees and to determine the living wage, while one stated that they had made a calculation.

Although the Covid 19 Pandemic had a major impact on employment and wages in Türkiye, only two suppliers stated that the pandemic affected wages.

Ten suppliers indicated that the brands had continued to place orders during the Covid 19. Seven suppliers stated that they had not given any support. It is also seen that brands did not offer any support for workers' wages.

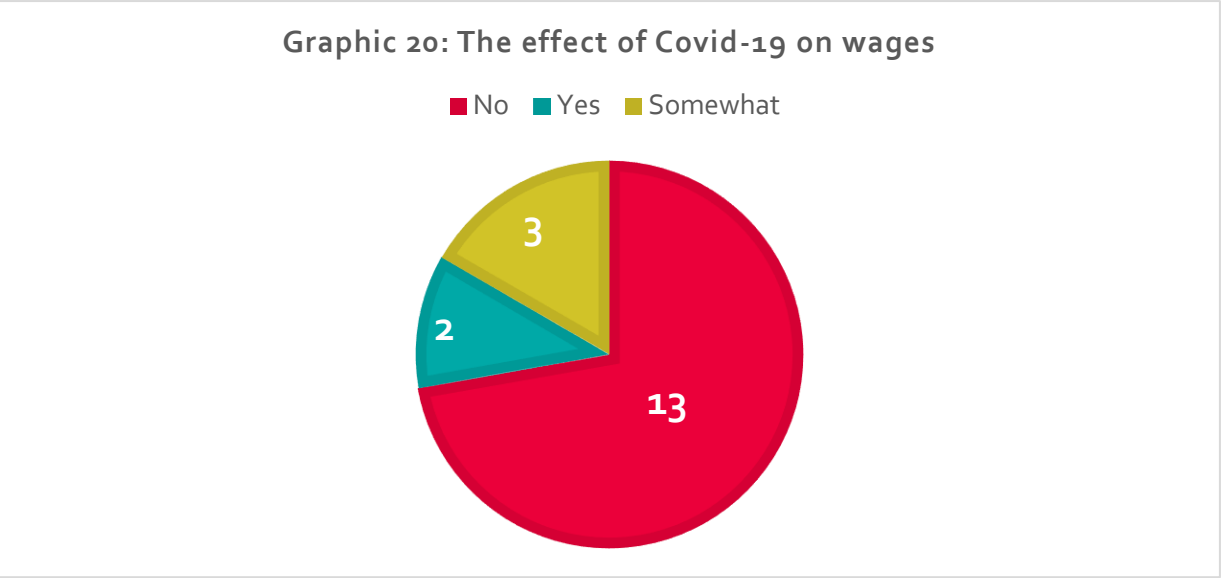
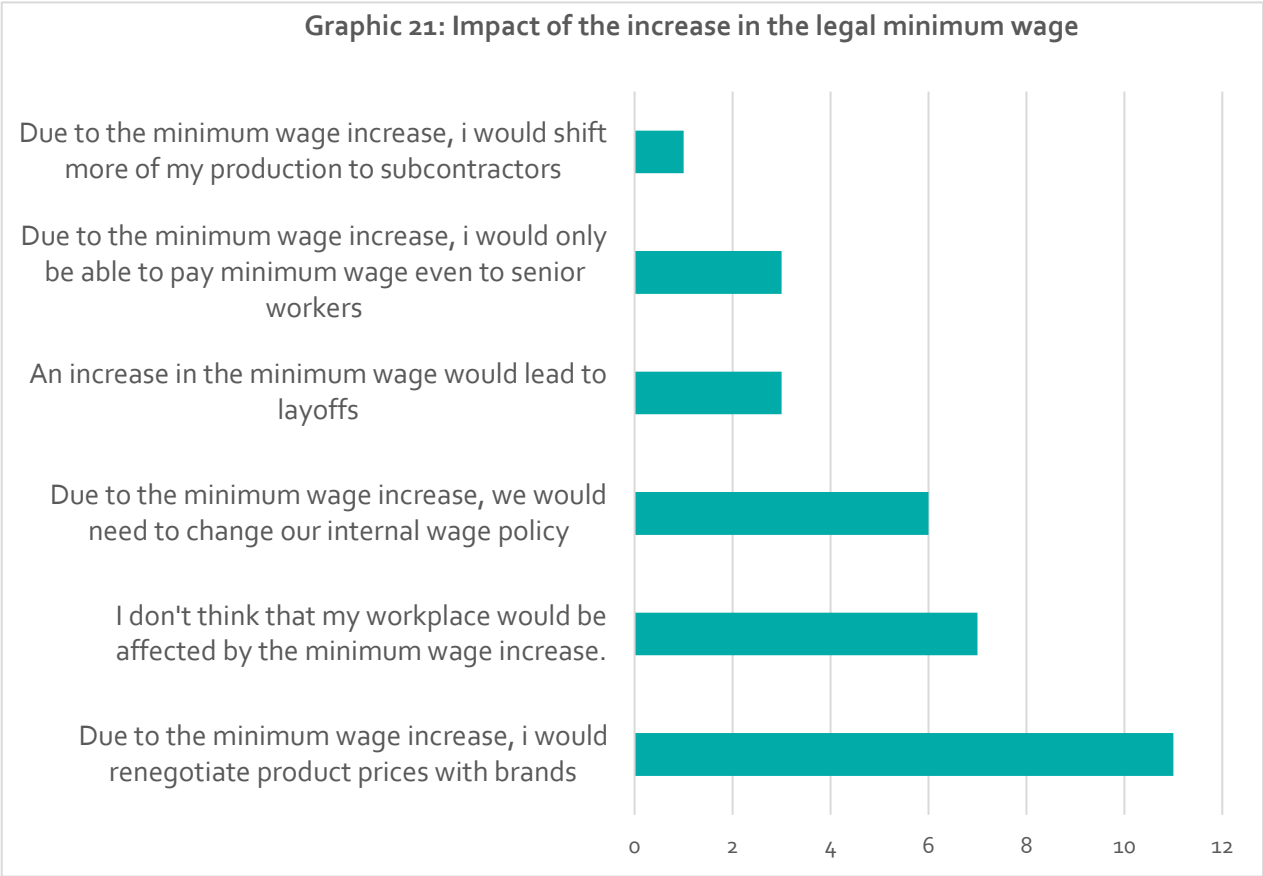


Table 17: Attitude of the brands during Covid 19

What was the attitude of the main international brands that you have produced for during the Covid-19 period?	N
The brands continued to place orders	10
The brands cancelled the orders	4
The brands did not give any support	7
Brands support for worker wages	0

Due to hyperinflation in Türkiye, the minimum wage has been raised continuously in recent years. However, this cannot prevent the downward trend in real wages. As displayed in Graph 21, eleven of the suppliers stated that due to minimum wage increase, they would renegotiate product prices with the brands.



High inflation and economic instability are reported as the most important obstacles to paying a living wage. Other responses are shown in Table 18.

Table 18: Most challenging obstacles to financing living wages

The three most challenging obstacles to financing living wages

Inflation

Employment difficulties

2023 global crisis

Brands' unwillingness to pay extra for the time being

Raw material price increase in general

National economy

Inflation

State governance

Customers do not accept the price difference if we pay the living wages

Costs

Fluctuations in the economy

Exchange rate

Government economic policy

House rents

Commodity prices

Since there are opportunists in the country, there have been unnecessary increases, no matter how much the military wage is increased, it does not meet the living wage. And brands cannot be returned for the necessary price increase.

Expenses

Low price

High inflation

Low currency

Economy increasing prices decreasing purchasing power

Low number of orders, inability to agree on prices with brands, inflation

High raw materials, high prices and customers demanding low prices

Exchange rate fluctuations

Brands' failure to pay the necessary labour wages

The difficulty of allocating provisions for severance pay

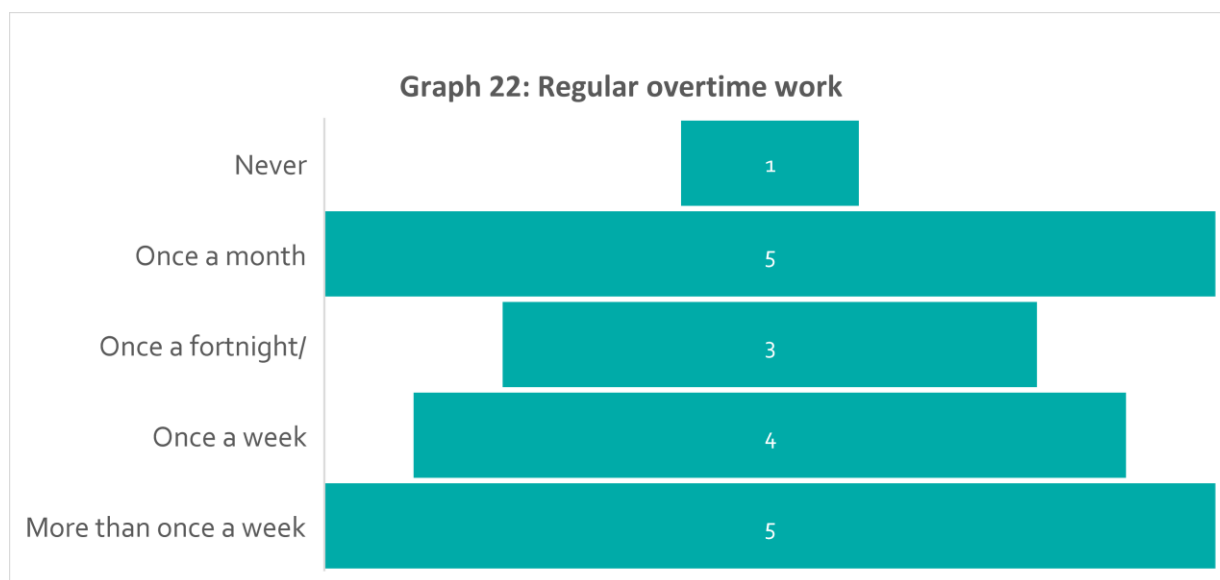
Competitive conditions

Stopping the hikes

Economic instability in the country

Exchange rates, labour and raw material costs

In relation to overtime, fourteen of the eighteen suppliers responding to the survey stated that they had a workplace policy on overtime. Only in one workplace there is no overtime work, while in eight workplaces, they work overtime more than once a week as shown in Graph 22.

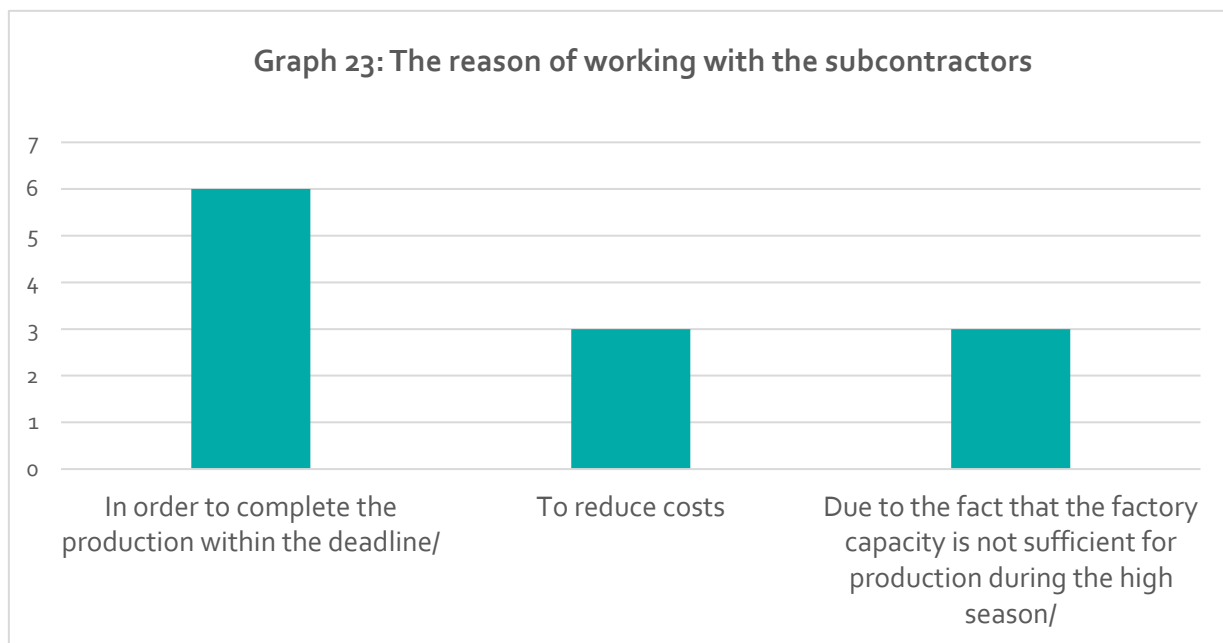


The main justification for overtime was stated as short deadlines. However, the brands stated that they avoided short deadlines. Other reasons can be found in Table 19.

Table 19: The main reasons for working overtime

	N
Short shipment deadline	11
Delay in input	9
High turnover of the workers	6
Changing models at the last moment	5
Changing the fabric	5
Repeat orders	3
Overplanning factory's capacity output	2

Seven of the suppliers stated that they have subcontractors. The major reason for working with subcontractors is meeting the deadlines as illustrated in Graph 23.



Embroidery and printing are the two main processes performed by subcontractors followed by sewing and washing.

Table 20: Parts of the production which are carried out by subcontractors

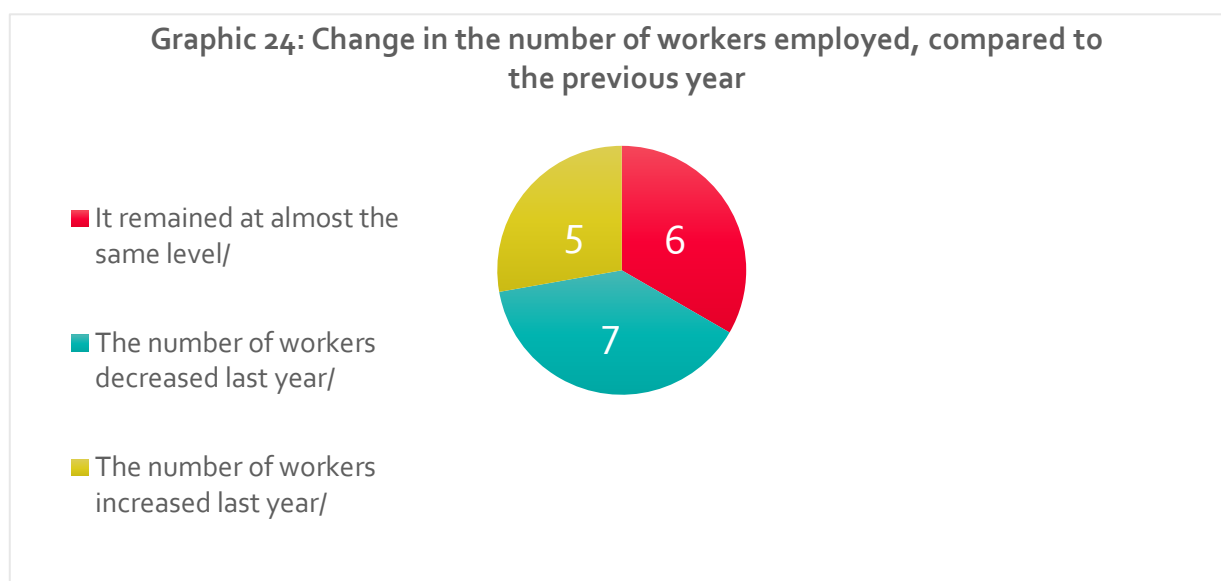
Which parts of your production are carried out by your subcontractors?	N
Embroidery	7
Printing	7
Sewing	6
Washing	6
Finishing (ironing/packaging)	3
Cutting	3
Ironing	2
Packaging	2

Sixteen of eighteen suppliers said they would look for new customers if they could not get orders from one of the major international brands they manufacture for and five said they would lay off workers, as shown in Table 21.

Table 21: What a supplier would do if they could not get an order from one of the major international brands for which they manufacture.

What would you do if you couldn't get an order from one of the major international brands you manufacture for?	N
I would look for new customers	16
I would have to lay off workers	5
I would turn to new investment areas	3
I would produce for the domestic market	3
I would shift my production to subcontractors	2
I couldn't pay my debts	2
I would switch to another industry	1

Ten out of eighteen suppliers stated that their production volume increased in the last year, while three suppliers stated that it remained the same, and three stated that it decreased. On the other hand, seven suppliers had reduced their workforce and five suppliers had increased their workforce. Reducing the number of workers despite the increase in the production volume results in either an increase in subcontracting or labour intensification. Both of these situations have negative effects on the working conditions of workers. Subcontracting leads to lower wages and more unfavourable working conditions, while labour intensification means that workers are forced to produce more in less time. Thus, employers are able to obtain more output with the same number of workers at the expense of more unfavourable working conditions. Therefore, the reasons for labour reduction should be examined in further detail.



With regards to the economic crisis in Türkiye, the most frequently mentioned effects of the economic crisis by suppliers are raw material prices and difficulties in paying wages, as shown in Table 22.

Table 22: Effects of economic contraction

How does economic contraction affect your business?	N
I have trouble with increased raw material prices	10
I have trouble paying fees	7
I cannot recruit new workers	6
I have trouble getting supplies	5
I cannot find credit	5
I reduced my production capacity	4
It did not affect my business	2
I downsized my business	2
I dismissed workers	1
I shifted my production to subcontractors	1

High inflation rates in recent years have led to excessive increases in input prices in Türkiye. Türkiye's dependence on foreign energy has caused the increase in energy prices to be reflected as a cost to production. With the increase in prices, eleven of the eighteen respondents think that the brands use the increase in the euro exchange rate as a price reduction tool when negotiating prices. Fourteen of the eighteen suppliers do not think the prices they agreed with their customers meet the high inflation experienced in Türkiye last year.

Table 23: The commodities where there have been the biggest price increases

Which of the following do you think has increased the most in the last year?	N
Housing prices	6
Energy prices	5
Food prices	3
Raw material prices	2
The price of the product sold	1
Fees	1
Total	18

Second highest price increases	N
Energy prices	5
Food prices	5

Housing prices (all housing costs)	3
Raw material prices	3
Fees	1
Fuel prices	1
Total	18

Third highest price increases	N
Fees	4
Energy prices	3
Fuel prices	3
Packaging prices	3
Food prices	2
Raw material prices	2
Housing prices (all housing costs)	1
Total	18

4.3 SUPPLIERS GENDER EQUALITY AND GENDER-BASED VIOLENCE AND HARASSMENT POLICIES

A gender-equitable workplace culture is the cornerstone of combating gender-based violence and harassment in the workplace. Therefore, in addition to gender-based violence and harassment, suppliers were also asked questions on gender equality and gender-based division of labour.

None of the suppliers reported that they had a female employee quit her job in the last year because of caring responsibilities. However, only two of the eighteen suppliers provide support to their employees concerning childcare.

Both previous research in the literature and the Fair Wear survey conducted with workers in eighteen supplier workplaces (see accompanying report: ELEPHANT) revealed a rigid gender-based division of labour in the garment industry. The responses given by suppliers also present similar results. As displayed in Table 24, thread cleaning, quality control, packaging, secretary, inline and final inspection are generally performed by women, while loading, cutting, ironing, and driving are mostly carried out by men.

Table 24: Work performed by gender

	Which of the following jobs are predominantly performed by male workers in your workplace?	Which of the following jobs are predominantly performed by female workers in your workplace?
Thread cleaning	0	94,4
Quality control	5,6	88,9
Sewing	66,7	61,1
Packaging	16,7	61,1
Secretary	5,6	61,1
Inline inspection	5,6	50,0
Final inspection	11,1	44,4
Sample room (sample sewing)	33,3	22,2
Toe closing	0	11,1
Cutting	72,2	11,1
Warehouse worker	44,4	5,6
Classification	38,9	5,6
Laboratory worker	0	5,6

Ironing	77,8	5,6
Forming	5,6	5,6
Driver	72,2	0,0
Maintenance	38,9	0,0
Forklift operator	22,2	0,0
Fabric quality control	11,1	0,0
Loading	83,3	

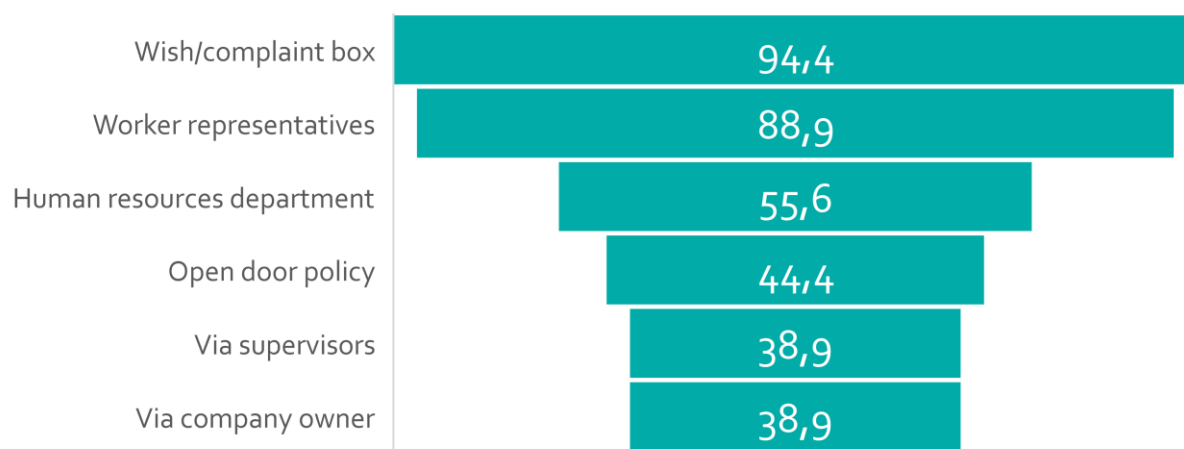
Only four of the eighteen suppliers have a policy on gender-based violence and harassment in the workplace. Respondents were asked which of a range of statements about gender-based violence and harassment were true. Only twelve of eighteen respondents recognised gender-based violence and harassment as a health risk. However, gender-based violence and harassment is a serious occupational health and safety risk and is frequently included in OSH policies and is an important feature of ILO Convention No. 190. Six respondents were of the view that only direct employers can play a role in combating gender-based violence and harassment. However, brands and suppliers can play an essential role in this struggle by carrying out due diligence on gender equality and gender-based violence and harassment, by executing trainings on gender equality and gender-based violence and harassment within the supply chain and by supporting factories for gender-equal working practices and by leading the implementation of a zero-tolerance policy on gender-based violence and harassment by suppliers. It is critical to ensure that suppliers adopt these policies through programmes including the sharing of good practice examples, consultancy and training. gender-based violence and harassment occurring in the workplace includes commuting to and from work and employer-provided accommodation. However, only four respondents found this statement correct. gender-based violence and harassment in the world of work can take place in the workplace as well as in the home, in public places, in employer-provided housing, in commuting to and from work and in cyberspace. All responses are displayed in the Table 25.

Table 25: Statements on gender-based violence and harassment

Please select which of the following statements on gender-based violence and harassment are true.	N
Gender-based violence and harassment means violence and harassment directed at persons because of their sex or gender or affecting persons of a particular sex or gender and includes sexual harassment	16
Gender-based violence is usually perpetrated by persons who hold a position of power or control over other individuals	15
Gender-based violence affects women, men, and gender non-conforming individuals	15
Sexual harassment includes physical, psychological, verbal and non-verbal conduct	14
Gender-based violence and harassment is a health risk	12
Only suppliers can prevent, mitigate and remediate gender-based violence as they are the direct employers	6
Gender-based violence and harassment occurring in the workplace includes commuting to and from work and employer-provided accommodation/	4
Gender-based violence and harassment occurring in the workplace includes only the physical workspace areas where workers are paid	3

Graph 25 shows that the most common complaints mechanisms are the wish box and the making a complaint via the workers' representation. However, in the survey conducted with workers in supplier workplaces, only 1.8per cent of the workers stated that they would make a complaint via the wish/complaint box, 7.8per cent to the worker representative, followed by 15.7per cent to the HR department, 41per cent to the supervisor, and 46.1per cent to the factory manager. Gender-sensitive and proactive complaints mechanisms (as part of the grievance mechanism) in which supervisors and HR staff play an active role are more effective in achieving positive results. For these mechanisms to be effective, all members should receive training on gender equality and gender-based violence and harassment, they should operate in an impartial and confidential manner, and they should reach conclusions quickly. In addition, complaint mechanisms should be operated in parallel with the mechanisms of support for victims.

Graph 25: Mechanisms to enable workers to make a complaint under the grievance mechanism



Training and awareness raising and breaking the silence on gender-based violence and harassment are crucial to ensuring safe spaces for workers to make complaints and seek redress. Overall, twelve out of eighteen suppliers stated that they provided awareness training on preventing violence and harassment for workers in their workplace. These suppliers also stated that they had a system to access to remedy or provide factory workers with a dedicated gender-sensitive complaints mechanism. The effectiveness of these systems is critical. Fifteen of the eighteen suppliers consider that their existing complaints mechanism to be adequate and effective. As seen in the Table 16 none of the suppliers have a gender equality committee elected by workers that also deals with gender-based violence and harassment or a committee that investigates gender-based violence and harassment complaints impartially.

Table 26: Systems to prevent gender-based violence and harassment at the workplace

What kind of systems do you have in your workplace to prevent gender-based violence and harassment?	N
We inform all workers and supervisors of zero-tolerance for gender-based violence and harassment policy, and hang it on the factory walls	11
We have a zero-tolerance policy for gender-based violence and harassment	9
We adopted gender-sensitive grievance procedures/access to remedy	7
Our zero-tolerance policy for gender-based violence and harassment is integrated in orientation and/or other trainings	6
We gave gender-based violence and harassment prevention training to the workforce	6
In case of gender-based violence and harassment, we have a complaint hotline that employees can easily contact	6
We have carried out a safety audit with workers to review whether the workplace is safe for women. It was ensured that there were no dark and unsafe places that pose risks of gender-based violence and harassment	5
We address the prevention of risks of gender-based violence and harassment through occupational safety and health measures, including risk assessments	3
We gave gender-based violence and harassment prevention training to supervisors and factory management	2
We evaluate the workforce's level of awareness of gender-based violence and harassment to determine the next step	1
We have a gender equality committee elected by workers that also deals with gender-based violence and harassment	0,0
We have a committee that investigates gender-based violence and harassment complaints impartially (please specify the components of the board by occupation and gender)	0,0

All of the suppliers stated that they never received a complaint on gender-based violence and harassment at their workplace. However, in the survey conducted at supplier workplaces, 16,87per cent of women reported that a colleague, supervisor, manager, etc., made obscene sexual gestures, sounds or stares. While 7,23per cent of the women said that a colleague, supervisor, manager, etc., had contact with her/her colleague involving kissing or other sexual touching and had unwanted physical contact with her/ colleague, 3,61per cent of women reported that a colleague, supervisor or manager sexually assaulted or forced her or a colleague.

In relation to domestic violence and how workers are supported, the majority of the suppliers stated that they did not receive any application in this regard. As shown in Graph 26, very few suppliers provided support to domestic violence victims, and none provided paid leave. However, in the case of gender-based violence, it is necessary to combat all gender-based violence and harassment forms in and outside the workplace together. And many support mechanisms exist to protect victims of domestic violence that employers can provide.

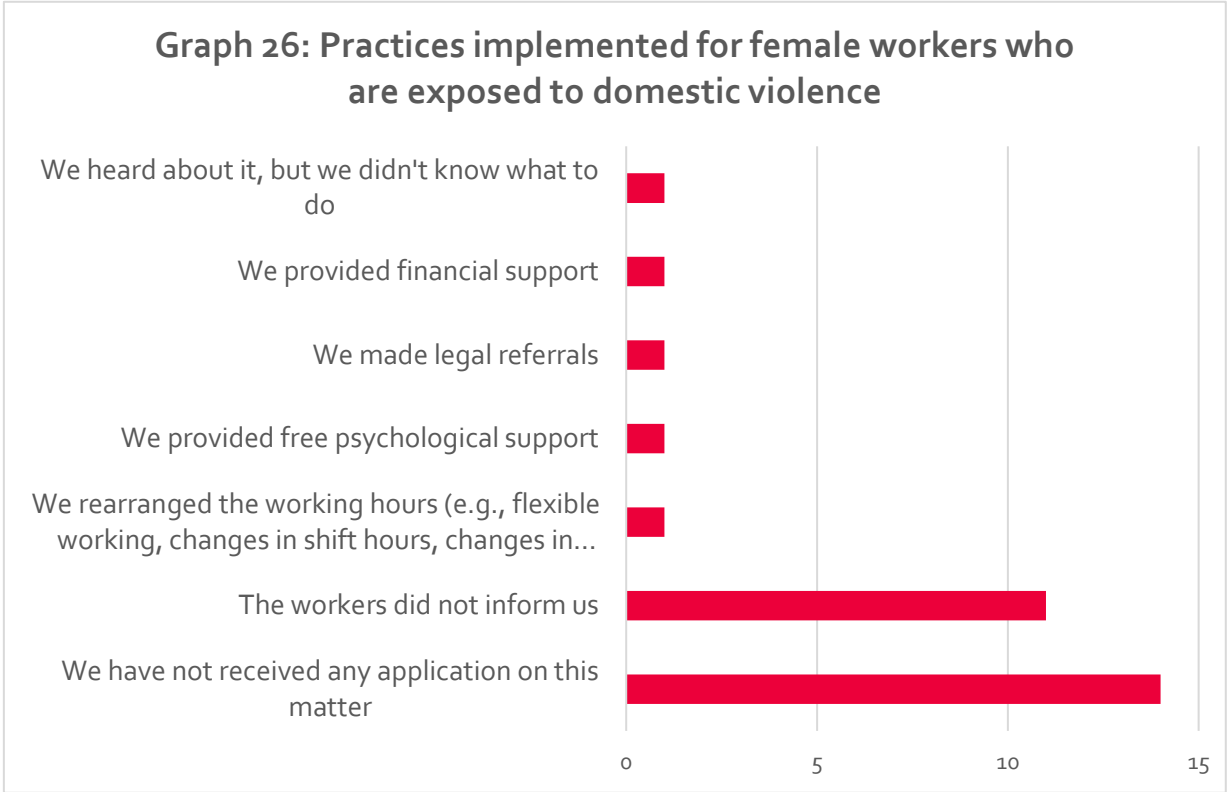


Table 27 shows that only some respondents could identify some risk factors that cause gender-based violence and harassment. However, in order to combat gender-based violence and harassment in the workplace, it is first necessary to identify the root causes. This situation shows that suppliers need training, support and guidance for such an analysis.

Table 27: Main risk factors associated with gender-based violence and harassment

What are the three main risk factors associated with gender-based violence and harassment?
Sexual, physical and socio-economic
Social norms that support male superiority
Norms that maintain women's inferiority
Not enough laws and policies
Workplaces
Transportation
Religious beliefs
Mental disorder and drugs
Education
Environmental factors
Economic status
Family
Socioeconomic violence
Physical violence
Seeing insults or negative behaviours against oneself as a normal situation.
Exclusion
Trick
Demeaning
Digital violence
Economic independence
Racism
Physical violence
Domestic violence
Child marriage
Coercion
Threats
Deception
Mental health disorder
Abuse of authority
Lack of training of employees on the subject
Social perspective towards women
No information
Unknown
Lack of education
Discrimination

As shown in Tables 28 and 29, suppliers recruited an average of 10.8 female and 9.5 male workers in the last year. On the other hand, an average of 7 women and 9.17 men were dismissed.

Table 28: Female workers who were recruited last year?

Number of female workers who were recruited last year	Number of suppliers
3	1
4	3
5	3
6	2
8	1
10	1
12	2
13	1
15	1
17	1
25	1
40	1
TOTAL 194 / AVERAGE 10,8	18

Table 29: Male workers who were recruited last year

Number of male workers who were recruited last year	Number of suppliers
2	1
3	3
5	3
6	3
11	3
12	1
14	1
20	1
23	1
25	1
TOTAL 171 / AVERAGE 9,5	

5. CONCLUSION

The results of the study with the twenty brands and eighteen suppliers provide guidance on the steps that need to be taken to reaching living wages and gender equality, specifically in tackling gender-based violence and harassment. While the majority of Codes of Conduct contain provisions on living wage and gender-based violence and harassment, few provide detailed guidance on how suppliers can pay living wage and tackle gender-based violence and harassment. Often their answers are vague and lofty and not backed by a practical roadmap. Although brands have responded that they care about both issues, these responses are not sufficiently reflected in the practices of suppliers. This is because brands did not support their suppliers adequately in implementing RBC policies. For example, only a quarter of the companies have trained their business partners about adherence to and implementation of their RBC policy. Regarding living wages, more than half of the brands carried out a partial risk assessment. However, nine out of twenty brands surveyed stated that they did not know how purchase prices relate to wage levels in Turkish factories. In addition, thirteen out of twenty companies said that they had some idea of price formation, but labour costs were not identified as individual cost. Indeed, only five of the respondents to the survey of eighteen suppliers producing for Fair Wear member brands have taken specific action to implement the living wage in their workplaces. High inflation and economic instability were cited as the most important obstacles to the payment of a living wage. As a first step towards a living wage, brands need to establish and understand the close link between their purchase prices and wages and carry out a comprehensive risk assessment on wages.

The second critical theme of the survey of brands and suppliers was gender equality with a focus on gender-based violence and harassment. Only eight of the brands conducted a comprehensive risk assessment and only three brands have developed a strategy or roadmap to reduce gender-based violence and harassment in their supply chains in Türkiye. Unfortunately, only four out of eighteen suppliers have a policy on gender-based violence and harassment in the workplace. However, twelve out of eighteen suppliers stated that they provide awareness training on the prevention of violence and harassment against workers in their workplaces. The fact that suppliers stated that they did not receive any complaints about gender-based violence and harassment indicates that complaint mechanisms are not functioning. However, the research conducted with workers showed that various forms of gender-based violence and harassment occur in supplier workplaces. Brands need to support the development of a gender-based violence and harassment policy and accessible grievance mechanisms. They can facilitate the development of a comprehensive anti-gender-based violence and harassment policy at their suppliers, both through the development of detailed supplier Codes of Conduct and through training and expert support.

6. RECOMMENDATIONS

Based on the findings of the study, the research team has formulated recommendations brands and suppliers regarding living wages and gender equality, with a focus on gender-based violence.

The recommendations for brands are grounded in a human rights due diligence framework, with brands taking responsibility for human rights throughout their whole value chain and embedding this throughout all their business practices. In order to do this, brands need to effectively, and in good faith, engage with relevant stakeholders, such as suppliers, workers' representatives, and workers.

6.1 RECOMMENDATIONS FOR BRANDS REGARDING LIVING WAGES

- 1** Develop detailed Codes of Conduct to guide their suppliers and share their responsible business conduct policy across their supply chain (with suppliers, subcontractors, agents/intermediaries) in Türkiye and train all their business partners regarding these Codes of Conduct.
- 2** Regularly share and negotiate their production plans with their suppliers.
- 3** Monitor that all rights arising from the labour legislation are paid to workers timely and completely.
- 4** Ensure that deadlines for orders do not lead to violations of working conditions and access to and exercise of workers' rights.
- 5** Carry out a thorough risk assessment to address (wages below) living wages.
- 6** Establish policies and commitments that prevent wage inequalities caused by factors such as gender, age, ethnicity, etc.
- 7** Take a position to protect and support suppliers and workers against unforeseen circumstances in the national economy.
- 8** Adopt a strategy/roadmap to increase wages in their supply chains in Türkiye.
- 9** Support unionisation in supplier workplaces and prioritise unionised workplaces in supplier selection.
- 10** Demonstrate a clear understanding of the labour cost component of their buying prices. Calculate the prices taking into account the living wages and time of the workers who produce the products. Maintaining a solid relationship between the payments to suppliers and the wages that suppliers pay their workers.
- 11** Build the capacity of intermediaries and agents on social sustainability and share RBC policies with them in detail. Develop training programs on international and national labour standards for their intermediaries and agents.
- 12** Inspect the subcontractor facility of their suppliers before starting the business relationship to check general working conditions.
- 13** Conduct surveys in their supplier workplaces in order to understand the working conditions and expectations of employees (These surveys should be carried out by an impartial researcher from outside the workplace.)

6.2 RECOMMENDATIONS FOR BRANDS REGARDING GENDER-BASED VIOLENCE AND HARASSMENT

- 1** Regulate detailed grievance mechanisms in their Codes of Conduct.
- 2** Carry out a thorough risk assessment to fully understand the risk of gender-based violence in the Turkish context.
- 3** Establish a strategy/roadmap to reduce gender-based violence and harassment in their supply chain in Türkiye.
- 4** Review all existing company policies and procedures in terms of gender equality and adopt a zero-tolerance policy on gender-based violence and harassment.
- 5** Carry out due diligence on gender equality and gender-based violence and harassment by drawing on guidance provided by Fair Wear.
- 6** Create, support, monitor, and document an action plan to ensure gender equality in the supply chain.
- 7** Support suppliers in receiving training on gender equality and gender-based violence and harassment within the value chain, promoting gender equality in their work practices.
- 8** Request gender equality progress reports from suppliers
- 9** Lead the implementation of a zero-tolerance policy on gender-based violence and harassment by suppliers and ensure that suppliers adopt these policies through programmes including the sharing of good practice examples, consultancy and training.
- 10** Draw up contractual obligations on suppliers e.g., to have a workplace policy, a complaints system and measures to prevent gender-based violence and harassment.
- 11** Develop and publicise framework agreements on the prevention of violence and harassment at work with international trade unions at the global level.

6.3 RECOMMENDATIONS FOR SUPPLIERS REGARDING LIVING WAGES

- 1** Carry out a special action to implement the living wage in their workplace.
- 2** Respect the freedom of association and the rights of collective bargaining.
- 3** Ensure that all workers in the workplace are treated equally in terms of their wages and working conditions.
- 4** Implement a "pay transparency" policy among the workers.
- 5** Avoid exceeding the factory's production capacity. Avoid compulsory and excessive overtime work under all circumstances.
- 6** Prevent delays in material procurement by establishing continuous and sustainable supply relationships.
- 7** Ensure that workers have full and timely access to wages, overtime pay, bonuses, social rights, seniority and notice rights, etc. arising from labour law and collective bargaining agreements.
- 8** Establish minimum labour relations with workers in accordance with the labour law, avoid unregistered, child labour and precarious labour relations.
- 9** Inspect the workplaces where you do contract work in terms of labour wages and working conditions, do not establish an unregistered subcontracting relationship.

6.4 RECOMMENDATIONS FOR SUPPLIERS REGARDING GENDER-BASED VIOLENCE AND HARASSMENT

- 1** Adopt a policy on gender-based violence and harassment in the workplace.
- 2** Provide awareness training on preventing violence and harassment for workers in their workplace.
- 3** Adopt a comprehensive policy on zero tolerance to gender-based violence and harassment which is aligned with ILO Convention No. 190 / Recommendation No. 206.
- 4** Prevent gender-based division of labour and gender segregation of jobs in their workplace and implement a policy that ensures that women workers are employed at all levels.
- 5** Transform the factory grievance mechanisms into a reliable system where sensitive issues such as violence and harassment can be addressed. Prepare a policy and procedure regarding this matter.
- 6** Review all current company policies and procedures with regard to gender equality, including documents related to recruitment and termination policies.
- 7** Evaluate the complaints on violence & harassment, establish a commission to investigate the issue consisting of two women representing the management and two women representing the workers, for a total of four person.
- 8** Carry out training and awareness raising for workers, supervisors, occupational health and safety specialists, workplace doctors and managers on preventing and addressing gender-based violence and harassment, on appropriate behaviour in the workplace, creating safe spaces for workers to discuss gender-based violence and harassment, training on investigation for the committee members, including how to effectively remediation of complaints.
- 9** Communicate its gender-based violence and harassment policy to its business partners, subcontractors, service providers, and suppliers through training. Ensure that your gender equality policies are included in the service & goods procurement agreement.
- 10** Consider violence and harassment (both domestic and workplace) as a matter of occupational health and safety.
- 11** Co-operate with trade unions and NGOs.
- 12** Adopt an action plan to raise awareness on gender equality and prevention of gender-based violence and harassment in all their sub-contractors.

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