



Factory Assessment Report

Sustainable Compliance Initiative (SCI)

Companies that join the Fair Labor Association (FLA) agree to uphold the FLA Workplace Code of Conduct throughout their entire supply chain. The Code of Conduct is based on International Labour Organization (ILO) standards, and defines labor standards that aim to achieve decent and humane working conditions.

FLA member(s)	Roots - 4754
Country	Türkiye
Assessment Date	6/25/2026
Assessment Company	Key of Sustainability Denetim Ltd. - 200004

Workforce Summary

Number of Workers	120
Percentage female	52 %
Primary Languages	Turkish

Wage Data information

Monthly minimum wage in country at time of assessment	N/A
GLWC living wage benchmark for the country or relevant region at time of assessment	N/A

Assessment Summary

Violations per FLA Code Element	Violated Benchmarks
Nondiscrimination (ND)	0
Health, Safety And Environment (HSE)	16
Employment Relationship (ER)	12
Hours Of Work (HOW)	0
Harassment Or Abuse (HA)	0
Freedom Of Association And Collective Bargaining (FOA)	0
Forced Labor (F)	0
Child Labor (CL)	0
Compensation (C)	1

Violations per Category	Violated Benchmarks
Immediate Action Required	17
Sustainable Improvement Required	12
Uncorroborated Risk of Non-Compliance	0
Notable Feature	0



Assessment Results

Compensation (C)

Benchmark ID	C.22
Benchmark Details	Employers must establish a system through which workers can dispute compensation and receive clarifications in this respect in a timely manner.
Finding Details	One suggestion/complaint box in the toilet on ironing department (-1 floor) was not marked as "Suggestion/Complaint Box", with no policy/procedure posted nearby. One other suggestion/complaint box in the toilet on knitting department (1st floor) was not locked, with no policy/procedure posted nearby either.
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required
Local Law	

Employment Relationship (ER)

Benchmark ID	ER.17.5
Benchmark Details	Employers shall have in place procedures to track the number, types, and timing and resolution of grievances, and to communicate the resolution of grievances to the workforce.
Finding Details	Worker representatives, external OHS Specialist and factory management have a periodical meeting on OHS topics. However, meeting results are not communicated/posted to workers.
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required
Local Law	

Benchmark ID	ER.3.3
Benchmark Details	Workers should be provided with written documentation that substantiates all the issues covered in orientation briefings.



Finding Details

The company does not have a handbook for the orientation training provided, and it is not distributed to employees.

Recommendations for Immediate Action

Recommendations for Sustainable Improvement

Compliance Classifications

Sustainable improvement required

Local Law

Benchmark ID

ER.4

Benchmark Details

Employers shall inform workers about workplace rules, environmental protection systems, health and safety information, and laws regarding workers' rights with respect to freedom of association, compensation, working hours, and any other legally required information, and the FLA Code through appropriate means, including posted in local language(s) throughout the workplace's common areas.

Finding Details

Factory doesn't provide regular communication to workers on all FLA's or company's Code elements and Employment Functions.
FLA or company Code was not posted/communicated with workers.

Recommendations for Immediate Action

Recommendations for Sustainable Improvement

Compliance Classifications

Sustainable improvement required

Local Law

Benchmark ID

ER.8

Benchmark Details

Employers shall have written policies and procedures with regard to promotion, demotion, and job reassignment that outline the criteria, demonstrate linkages to job grading, and prohibit discrimination or use of demotion or job reassignment as a form of penalty or punishment, are provided in writing and seek feedback from employees in writing, and follow all local legal requirements.

Finding Details

Factory doesn't have policies and procedures on promotion, demotion and job reassignment.
Factory has no promotion process based on job performance.

Recommendations for Immediate Action



**Recommendations
for Sustainable
Improvement**

**Compliance
Classifications**

Local Law

Sustainable improvement required

Benchmark ID

ER.19.1

Benchmark Details

Employers shall maintain on file all documentation needed to demonstrate compliance with the FLA Workplace Code and required laws.

Finding Details

The business license was obtained in 1993 for 3000 square meters, and the operating license has not been updated since then. In 1993, building permits were obtained for 5466 square meters of usable space, but currently the total usable area is 7166 square meters. Building permits have not been obtained for an area of $7166 - 5466 = 1700$ square meters.

**Recommendations
for Immediate Action**

Factory should apply to update the business license to cover each area of use.

**Recommendations
for Sustainable
Improvement**

**Compliance
Classifications**

Immediate Action Required

Local Law

Pursuant to Law No. 3572 on Business Opening and Operating Licenses and the Regulation on Business Opening and Operating Licenses issued under this Law, a business may operate only within the scope of the activities specified in its business opening and operating license. Conducting activities that are not covered by the license constitutes a violation of the licensing legislation and may result in administrative sanctions.

Benchmark ID

ER.1.1

Benchmark Details

Employers shall have in place written policies and practices and maintain proper and accurate records governing all aspects of employment from recruitment, hiring and probation, including written terms and conditions of employment, job descriptions, administration of compensation, and working hours for all positions, through to retrenchment and termination processes. Factory doesn't have a remediation plan when a child is found in the factory. On the existing procedure of remediation, it only indicates terminating a child's employment.

Finding Details

**Recommendations
for Immediate Action**

**Recommendations
for Sustainable
Improvement**



**Compliance
Classifications**
Local Law

Sustainable improvement required

Benchmark ID

ER.6.1

Benchmark Details

Employers shall have written policies and procedures and implement practices that encourage ongoing training of all categories of workers with the goal of raising or broadening skills in order to advance in their careers within the factory or beyond.

Finding Details

Factory doesn't have written policies and procedures on personnel development that encourage ongoing training with the goal of raising or broadening workers' skills so they can advance in their careers.

**Recommendations
for Immediate Action**

**Recommendations
for Sustainable
Improvement**

**Compliance
Classifications**

Sustainable improvement required

Local Law

Benchmark ID

ER.5.1

Benchmark Details

Employers shall ensure that all supervisors are trained in national laws, workplace regulations, and the FLA Code, workplace grievance systems, and the appropriate practices to ensure compliance.

Finding Details

Factory doesn't provide any specific training to the relevant supervisors that includes all FLA's or company's Code elements and Employment Functions.

**Recommendations
for Immediate Action**

**Recommendations
for Sustainable
Improvement**

**Compliance
Classifications**

Sustainable improvement required

Local Law

Benchmark ID

ER.3.1



Benchmark Details	Employers shall provide an orientation to new employees at the time of hiring, which includes explanations of the employers' rules, compensation package and policies for human resources, grievance systems, industrial relations, including respect of the right to freedom of association, workers' rights and responsibilities, FLA Code of Conduct, health and safety, and environmental protection.
Finding Details	The company's most recent social compliance training (periodic social and environmental training due August 14, 2025) was given in January 2026 by an external Occupational Health and Safety expert, and workers are only aware that they have received training on occupational health and safety.
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required
Local Law	

Benchmark ID	ER.7.1
Benchmark Details	Employers shall have written policies and procedures with regard to performance reviews that outline the review steps and process, demonstrate linkages to job grading, prohibit discrimination, are provided in writing and seek feedback and agreement/disagreement from employees in writing, and that follow all local legal requirements.
Finding Details	Factory doesn't have policies and procedures on performance reviews that include steps and processes, linkages to job grading, nondiscrimination, written feedback. Factory doesn't conduct performance review to workers.
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required
Local Law	

Benchmark ID	ER.1.2
Benchmark Details	Employers shall assign responsibility for the administration of human resources to a clearly defined and adequately qualified staff member or staff members and ensure workers at all levels receive communication and training about existing policies and procedures or any revisions.

Finding Details

Factory doesn't have a clearly defined qualified staff responsible of social compliance issues at the workplace. Factory Manager is handed over Social Compliance part and Production Manager handed over HR part after HR personnel left the company on December 2025. Factory doesn't provide Company Code elements or FLA Codes to workers. Code elements written on document by external specialist on reports. On the training report, code of conduct elements displayed on the report but had no photo report/training evaluation existing. Meanwhile, trainings cannot be verified via worker interviews.

Recommendations for Immediate Action

Recommendations for Sustainable Improvement

Compliance Classifications

Sustainable improvement required

Local Law

Benchmark ID

ER.1.3

Benchmark Details

Employers should implement an annual, review process with input from workers of all policies, procedures and their implementation to ensure they meet legal requirements and the FLA Workplace Code.

Finding Details

Factory's policies and procedures on all FLA's or company's Code elements and Employment Functions are not regularly reviewed.

Workers are not consulted or integrated in the decision making process of aspects concerning workplace and working conditions (e.g., creation or revision of policies and procedures, changes on production processes, hours of work, etc.)

Recommendations for Immediate Action

Recommendations for Sustainable Improvement

Compliance Classifications

Sustainable improvement required

Local Law

Health, Safety And Environment (HSE)

Benchmark ID

HSE.14.1

Benchmark Details

All production machinery, equipment and tools shall be properly guarded and regularly maintained.

Finding Details

There were 3 gas cylinders in a small machine room on delivery floor.

The technical inspection of the indoor freight elevator was completed on May 13, 2026. It appears that the application was submitted on May 14, 2026.

Factory implemented a complete lockout-tagout maintenance safety procedure however there was no equipment and relevant technical personnel was not communicated about the procedure.

Recommendations for Immediate Action

Factory must ensure that gas cylinders are stored in a safe area outside of the factory.

Factory must ensure that load lift periodical inspection is conducted once in a year.

Recommendations for Sustainable Improvement

Compliance Classifications

Immediate Action Required

Local Law

1. There were 3 gas cylinders in a small machine room on delivery floor.

Occupational Health and Safety Law No. 6331

Regulation on Health and Safety Conditions in the Use of Work Equipment

Regulation on Occupational Health and Safety Measures in Working with Chemical Substances

Regulation on Protection of Buildings from Fire

2. The technical inspection of the indoor freight elevator was completed on May 13, 2026. It appears that the application was submitted on May 14, 2026.

Occupational Health and Safety Law No. 6331

Regulation on Health and Safety Conditions in the Use of Work Equipment

3. Factory implemented a complete lockout-tagout (LOTO) maintenance safety procedure; however, there was no equipment and relevant technical personnel had not been informed/trained about the procedure.

Occupational Health and Safety Law No. 6331

Regulation on Health and Safety Conditions in the Use of Work Equipment

Regulation on the Training of Employees on Occupational Health and Safety

Benchmark ID

HSE.5.1

Benchmark Details	All applicable, legally required or recommended elements of safe evacuation shall be complied with, including all of the following elements: posting evacuation plans; the installation and maintenance of fire alarms; the installation and maintenance of emergency lighting; ensuring aisles/exits are not blocked and that workers are not blocked within their workstations; employee education and training; and evacuation procedures and fire drills.
Finding Details	Electricity main panel in ironing floor has no fire extinguishers nearby. One emergency exit door was not marked. Except for the emergency exit doors leading to the fire escape at the back of the factory, all emergency exit doors in the company are missing push-bar mechanism.
Recommendations for Immediate Action	Factory should provide relevant fire extinguishers for electricity panels. Factory should mark emergency exit doors and ensure that emergency exit doors provided push bar mechanism.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	Regulation on Protection of Buildings from Fire – Appropriate portable fire extinguishers shall be provided in sufficient number and located so that they are readily accessible in areas where fire hazards exist, including electrical equipment and electrical distribution panels. Regulation on Occupational Health and Safety Signs – Emergency exits and escape routes shall be identified by appropriate safety signs and remain clearly visible at all times. Regulation on Protection of Buildings from Fire – Emergency exit doors shall be capable of being opened easily and immediately by any person who may need to use them in an emergency. Doors on escape routes shall open in the direction of escape and shall not require a key or special knowledge to open. Where occupancy and risk require, panic exit devices (push-bar mechanisms) shall be installed to facilitate immediate evacuation.

Benchmark ID	HSE.5.1.3
Benchmark Details	All applicable, legally required or recommended elements of safe evacuation shall be complied with, including all the following elements: installation and maintenance of emergency lighting
Finding Details	One emergency light was not working - it was tested.
Recommendations for Immediate Action	Factory should provide emergency lights to illuminate emergency exit doors and halls, and ensure that is working at all times.

Recommendations for Sustainable Improvement

Compliance Classifications

Immediate Action Required

Local Law

Regulation on Protection of Buildings from Fire – Emergency lighting systems shall be maintained in proper working order and regularly tested to ensure they function effectively in the event of a power failure or emergency evacuation.

Benchmark ID

HSE.9.1

Benchmark Details

All chemicals and hazardous substances shall be properly labeled and stored in secure and ventilated areas and disposed of in a safe and legal manner, in accordance with applicable laws and international standards.

Finding Details

Factory doesn't have proper spill response equipment ready for use at chemical storage areas.
Few chemical tanks are not provided with sufficient and adequate secondary containment.

Recommendations for Immediate Action

Factory should provide spill response equipment ready for use at the chemical storage area and ensure that all chemical tanks/bottles are provided with secondary containment.

Recommendations for Sustainable Improvement

Compliance Classifications

Immediate Action Required

Local Law

Regulation on Occupational Health and Safety Measures in Working with Chemical Substances – Employers shall take the necessary measures to prevent or control accidental releases of hazardous chemicals and shall ensure that appropriate emergency response equipment is readily available where hazardous chemicals are stored or used.
Regulation on Occupational Health and Safety Measures in Working with Chemical Substances – Employers shall ensure that hazardous chemicals are stored safely and that appropriate engineering controls and containment measures are implemented to prevent leaks, spills, and exposure to employees.

Benchmark ID

HSE.17.1

Benchmark Details

Workstations, including seating and standing arrangements and reach required to obtain tools, shall be designed and set-up in such a manner as to minimize bodily strains.

Finding Details

Employees in the ironing department work in a standing position for the whole day without anti-stress mats.

Recommendations for Immediate Action

Factory must ensure that workers are provided anti-stress mats who are working in standing position.

Recommendations for Sustainable Improvement

Compliance Classifications

Immediate Action Required

Local Law

Regulation on Workplace Building and Annexes Health and Safety Measures

The employer shall ensure that workstations are designed and arranged in accordance with ergonomic principles, taking into account the nature of the work and the physical characteristics of employees. Working conditions shall be organized to minimize physical strain and musculoskeletal risks.

Benchmark ID

HSE.1

Benchmark Details

Employers shall comply with all national laws, regulations and procedures concerning health, safety, and the environment.

Finding Details

Since 1993, building permits have been obtained for 5466 square meters of usable space, but currently the total usable area is 7166 square meters. Building permits have not been obtained for the remaining 1700 square meters.

Recommendations for Immediate Action

Factory should apply to update the business license to cover each area of use.

Recommendations for Sustainable Improvement

Compliance Classifications

Immediate Action Required

Local Law

This constitutes non-compliance with the requirements of Turkey's Zoning Law No. 3194, particularly the provisions requiring a building permit for construction and an occupancy permit for the lawful use of buildings (Articles 21 and 30). Depending on the circumstances, the enforcement and administrative penalty provisions under Articles 32 and 42 may also apply.

Benchmark ID

HSE.10.1

Benchmark Details

Material Safety Data Sheets (MSDS) for all chemicals and hazardous substances used in the workplace must be available at the usage and storage sites of the chemicals and hazardous substances, in the local language and the language spoken by workers, if different from the local language.

Finding Details

Two chemical substances have no MSDS records in the chemical storage room.

Recommendations for Immediate Action

Factory must ensure that all chemicals are provided with MSDS records in the chemical storage room.

Recommendations for Sustainable Improvement

**Compliance
Classifications**

Immediate Action Required

Local Law

The Turkish Regulation on Safety Data Sheets for Hazardous Substances and Mixtures, which requires hazardous substances and mixtures to be accompanied by an up-to-date Safety Data Sheet. Depending on the nature of the chemicals, this may also constitute non-compliance with Occupational Health and Safety Law No. 6331.

Benchmark ID

HSE.4.1

Benchmark Details

Employers shall at all times be in possession of all legally required and valid permits and certificates related to health, safety, and environmental issues, such as: Purchase and storage of chemicals; Fire safety inspections; Machinery inspections; Waste disposal; Environmental licenses/permits; Sanitation permits, including those required for canteens; and Vehicle inspection and driver permits for all employer provided transportation.

Finding Details

The business license for 3000 square meters was obtained in 1993, and it has not been updated since then.

The company building has not undergone an earthquake resistance assessment.

**Recommendations
for Immediate Action**

Factory must ensure that legal permits are always updated in a timely manner.

Factory should provide an earthquake resistance assessment for the factory building.

**Recommendations
for Sustainable
Improvement**
**Compliance
Classifications**

Immediate Action Required

Local Law

Regulation on Business Opening and Operating Licenses – A business opening and operating license must accurately reflect the current characteristics and scope of the business. Where there are material changes to the workplace, including its operational scope or physical characteristics, the license must be updated accordingly.

Occupational Health and Safety Law No. 6331 – Employers are required to ensure that workplaces are safe and suitable for their intended use, to identify workplace hazards, assess risks, and implement the necessary preventive measures to protect employees. Where structural safety, including seismic resistance, may affect employee health and safety, the employer is responsible for assessing and managing these risks.

Benchmark ID

HSE.7

Benchmark Details	Workers shall be provided at no cost with all the appropriate and necessary personal protective equipment (e.g. gloves, eye protection, hearing protection, respiratory protection) to effectively prevent unsafe exposure (e.g. inhalation or contact with solvent vapors, noise, dust) to health and safety hazards, including medical waste.
Finding Details	Eye wash bottles were not present in the chemical storage room.
Recommendations for Immediate Action	Factory should provide eyewash bottles or eye wash station in the chemical storage room.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	Regulation on Occupational Health and Safety Measures in Working with Chemical Substances – Employers shall provide appropriate emergency equipment and first-aid facilities where hazardous chemicals are used or stored. Where there is a risk of eye exposure to hazardous chemicals, suitable emergency eyewash facilities shall be readily available and easily accessible.

Benchmark ID	HSE.6.1
Benchmark Details	All safety and medical equipment (e.g. fire fighting equipment, first aid kits) shall be available in sufficient numbers throughout the workplace, maintained and stocked as prescribed, and easily accessible to workers.
Finding Details	Eyewash bottles were missing in the chemical storage room. Few fire extinguishers are not hung on the wall, but are located on the floor.
Recommendations for Immediate Action	Factory should provide eyewash stations or eyewash bottles in the chemical room. Factory should hang fire extinguishers on the wall.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	Regulation on Occupational Health and Safety Measures in Working with Chemical Substances – Employers shall provide appropriate emergency washing and first-aid facilities, including eyewash equipment where necessary, whenever hazardous chemicals may pose a risk of eye exposure. Regulation on Protection of Buildings from Fire – Portable fire extinguishers shall be installed in designated, readily accessible, and clearly visible locations, securely mounted or otherwise properly positioned to ensure immediate use during an emergency.

Benchmark ID	HSE.19
Benchmark Details	All facilities including workplace buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with all applicable laws, including relevant sanitation, medical, and safety and health regulations.
Finding Details	Factory doesn't provide drying in toilets, such as paper towel or hand drying machines. Also, no toilet paper is available for the toilet cabinets.
Recommendations for Immediate Action	Factory should provide paper towels and toilet paper in the cabinets.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	Regulation on Workplace Building and Annexes Health and Safety Measures Employers shall provide adequate sanitary facilities, including toilets and washrooms, and ensure that they are properly equipped, maintained, and supplied with the necessary hygiene materials. Washing facilities shall include appropriate means for hand drying, and toilet facilities shall be maintained in a hygienic condition.

Benchmark ID	HSE.8
Benchmark Details	Workers shall be provided with training on the use and maintenance of personal protective equipment. Training shall be upon hire with periodic refresher training offered to all workers. Management will ensure use of PPE as necessary.
Finding Details	Mechanic technician was not using a protective mask while working with solvent chemical cleaning machine parts. One worker in the delivery department was not wearing protective shoes.
Recommendations for Immediate Action	Factory must ensure that mechanical technicians use protective masks when working with chemicals. Factory must ensure that delivery department workers wear protective shoes.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required

Local Law	Regulation on the Use of Personal Protective Equipment at Workplaces – Where risks cannot be eliminated by collective protection measures or work organization, employers shall ensure that appropriate personal protective equipment (PPE) is provided, used, and supervised. Employees shall use the PPE provided in accordance with its intended purpose.
Benchmark ID	HSE.13
Benchmark Details	All necessary ventilation, plumbing, electrical, noise and lighting services shall be installed and maintained to conform to applicable laws and to prevent or minimize hazardous conditions to workers in the facility.
Finding Details	Inventory addressing/mapping has not been done on the electrical panels. In the ironing and packaging area, the indoor temperature was found to be extremely high, and thermal measurements in the same area showed a reading of 25 degrees Celsius in October 2023, according to existing indoor temperature measurement reports. The department head estimates that this temperature is higher than 40 degrees Celsius.
Recommendations for Immediate Action	Factory should provide mapping and identification of electricity panel to show which switch belongs to which area. Factory must ensure that thermal comfort assessment is conducted at the hottest and the coldest times in the factory.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	1. Inventory addressing/mapping has not been done on the electrical panels. Occupational Health and Safety Law No. 6331 Regulation on Health and Safety Conditions in the Use of Work Equipment Regulation on Electrical Installations 2. Excessively high indoor temperature in the ironing and packaging area. Occupational Health and Safety Law No. 6331 Regulation on Workplace Building and Annexes Health and Safety Measures Regulation on Health and Safety Measures in Working with Chemical Substances
Benchmark ID	HSE.18.2.1
Benchmark Details	An appropriate number of medical staff shall be on duty during all working hours, including any type of overtime, as required under national law.

Finding Details	Medical facility is only available when the jobsite doctor is present at the factory. Workers are not able to use the room as it's locked during the day.
Recommendations for Immediate Action	Factory must ensure that the jobsite doctor's room is available for an emergency during working times.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	Regulation on Occupational Health and Safety Services Employers shall ensure that occupational health services, including first aid and emergency medical facilities, are organized and readily accessible to employees whenever needed. The facilities and equipment necessary for occupational health services shall be available and maintained for use.
Benchmark ID	HSE.5.3
Benchmark Details	Alarm systems shall be regularly tested and evacuation drills shall be undertaken at least annually.
Finding Details	Second and third shift workers from the knitting department did not participate in the last fire drill.
Recommendations for Immediate Action	Factory must ensure that all workers participate in fire drills.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	Regulation on Emergencies in Workplaces – Employers shall ensure that all employees receive appropriate emergency preparedness training and participate in emergency drills at appropriate intervals. Emergency drills shall be organized to evaluate the effectiveness of emergency plans and ensure that all employees know how to respond in an emergency.
Benchmark ID	HSE.14.3
Benchmark Details	Employers shall ensure safety instructions are either displayed or posted near all machinery or are readily accessible to the workers in language(s) spoken by workers.
Finding Details	Safety instructions are not displayed near the load lift at the back of the factory (delivery department).
Recommendations for Immediate Action	Factory must ensure that safety instructions are displayed near the load lifts.



**Recommendations
for Sustainable
Improvement**

**Compliance
Classifications**

Local Law

Immediate Action Required

Occupational Health and Safety Law No. 6331

Employers are required to provide and maintain appropriate occupational health and safety signs where risks cannot be eliminated or adequately controlled by other measures. Safety signs, warnings, and instructions must be clearly visible, properly maintained, and placed at appropriate locations to inform employees of hazards and safe operating procedures.
