# 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.

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| **FLA member(s)** | Delta Galil Industries Ltd. - 21 |
| **Country** | Türkiye |
| **Assessment Date** | 6/22/2026 |
| **Assessment Company** | Key of Sustainability Denetim Ltd. - 200004 |

## Workforce Summary

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| **Number of Workers** | 72 |
| **Percentage female** | 42 % |
| **Primary Languages** | Turkish |

## Wage Data information

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| **Monthly minimum wage in country at time of assessment** | The legal monthly minimum wage in Türkiye in 2025 is 22104 TRY. |
| **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 |
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| **Nondiscrimination (ND)** | 0 |
| **Health, Safety And Environment (HSE)** | 9 |
| **Employment Relationship (ER)** | 4 |
| **Hours Of Work (HOW)** | 1 |
| **Harassment Or Abuse (HA)** | 0 |
| **Freedom Of Association And Collective Bargaining (FOA)** | 0 |
| **Forced Labor (F)** | 0 |
| **Child Labor (CL)** | 0 |
| **Compensation (C)** | 0 |

| Violations per Category | Violated Benchmarks |
|---|---|
| **Immediate Action Required** | 9 |
| **Sustainable Improvement Required** | 5 |
| **Uncorroborated Risk of Non-Compliance** | 0 |
| **Notable Feature** | 0 |

# Assessment Results

| Employment Relationship (ER) | |
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| **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** | The factory does not have policies and procedures on promotion, demotion and job reassignment. |
| **Recommendations for Immediate Action** | |
| **Recommendations for Sustainable Improvement** | |
| **Compliance Classifications** | Sustainable improvement required |
| **Local Law** | |

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| **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** | The factory does not 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** | |

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| **Benchmark ID** | ER.7.1 |

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| **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** | The factory does not have policies and procedures on performance reviews that include steps, processes, and linkages to job grading. Moreover, the factory does not conduct performance reviews for workers. |
| **Recommendations for Immediate Action** | |
| **Recommendations for Sustainable Improvement** | |
| **Compliance Classifications** | Sustainable improvement required |
| **Local Law** | |

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| **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** | The factory has updated some policies and procedures in response to social compliance audits. However, a regular update date could not be determined. Additionally, workers were not consulted or integrated into the decision-making process of aspects concerning workplace and working conditions (e.g., creation or revision of policies and procedures, changes to 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)

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| **Benchmark ID** | HSE.14.1 |
| **Benchmark Details** | All production machinery, equipment and tools shall be properly guarded and regularly maintained. |

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| **Finding Details** | The factory has not implemented a lockout-tagout maintanence safety system. |
| **Recommendations for Immediate Action** | Ensure that a formal Lockout/Tagout program is established and implemented for all maintenance and servicing activities, including documented procedures, appropriate lockout devices, employee training, and periodic inspections to ensure hazardous energy is effectively isolated before work begins. |
| **Recommendations for Sustainable Improvement** | |
| **Compliance Classifications** | Immediate Action Required |
| **Local Law** | Regulation on Health and Safety Conditions in the Use of Work Equipment – Annex I – Work equipment shall be equipped with means to isolate all energy sources where necessary, and maintenance, repair, cleaning, or adjustment activities shall be carried out only after hazardous energy has been effectively isolated to prevent accidental start-up or the release of stored energy. |

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| **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** | It was observed that the emergency exit door at the back of the fabric sample storage area did not comply with safety requirements. Specifically, it was a glass sliding door with an opening width of less than 80 cm, and its emergency lighting was not working. Furthermore, floor markings in the sewing department incorrectly designated a non-emergency door as an emergency exit. |
| **Recommendations for Immediate Action** | 1) Ensure that all emergency exit doors comply with applicable fire safety requirements by providing a clear opening width, opening in the direction of escape without the use of sliding mechanisms, using appropriate safety-rated construction, maintaining operational emergency lighting, and verifying that emergency exits remain readily usable at all times.<br>2) Ensure that emergency exit floor markings and directional signs accurately identify designated emergency exits, remove incorrect markings, and verify that all emergency escape routes are clearly and consistently marked throughout the facility. |
| **Recommendations for Sustainable Improvement** | |

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| **Compliance Classifications** | Immediate Action Required |
| **Local Law** | 1) Regulation on Protection of Buildings from Fire – Emergency exits and escape routes shall be of adequate width, readily usable in emergencies, open in the direction of escape where required, shall not be sliding or revolving doors where they serve as emergency exits, and emergency lighting shall be provided and maintained in working order.<br>2) Regulation on Occupational Health and Safety Signs – Safety signs shall accurately identify emergency exits and escape routes and shall not mislead employees regarding emergency evacuation. |

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| **Benchmark ID** | HSE.29 |
| **Benchmark Details** | Employers shall provide all necessary protection for workers when working at heights, confined spaces, and other high-risk areas. |
| **Finding Details** | The factory does not have a procedure for working in confined spaces. |
| **Recommendations for Immediate Action** | |
| **Recommendations for Sustainable Improvement** | |
| **Compliance Classifications** | Sustainable improvement required |
| **Local Law** | |

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| **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** | It was observed that one emergency lighting at the back of the fabric sample storage area was not working. |
| **Recommendations for Immediate Action** | Ensure that all emergency lighting is fully operational, regularly inspected, tested, and promptly repaired or replaced to maintain adequate illumination of escape routes during emergencies. |
| **Recommendations for Sustainable Improvement** | |
| **Compliance Classifications** | Immediate Action Required |

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| **Local Law** | Regulation on Protection of Buildings from Fire – Emergency exits and escape routes shall be of sufficient width, be readily and safely usable at all times, emergency exit doors shall not be sliding or revolving doors where they serve as emergency exits, and emergency lighting shall be provided and maintained in operational condition. |

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| **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** | 1) In the area where fabrics are received, it was observed that two containers of liquid chemical lacked secondary containers.<br>2) It was also observed that the chemical transport carts used to take the chemicals from the chemical room to production lacked secondary containers. |
| **Recommendations for Immediate Action** | 1) Ensure that all liquid chemical containers are stored within appropriate secondary containment capable of containing spills and leaks, and that chemical storage practices are regularly inspected for compliance.<br>2) Ensure that chemical transport carts are equipped with suitable secondary containment to prevent spills and leaks during transportation, and that chemicals are transported in a safe manner in accordance with established procedures. |
| **Recommendations for Sustainable Improvement** | |
| **Compliance Classifications** | Immediate Action Required |
| **Local Law** | Regulation on Occupational Health and Safety Measures in Working with Chemical Substances – Article 7 – Employers shall ensure that hazardous chemicals are stored, handled, and transported in a manner that prevents leaks, spills, and other risks to the health and safety of employees through appropriate preventive measures. |

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| **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** | It was observed that employees in the chemical spray and washing area were not wearing safety glasses. |

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| **Recommendations for Immediate Action** | Ensure that all employees working in the chemical spray and washing area are provided with and consistently wear appropriate safety glasses, and that PPE compliance is enforced through training, supervision, and routine workplace inspections. |
| **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 or adequately controlled by collective protective measures or work organization, employers shall provide suitable personal protective equipment and ensure that employees use it correctly. |

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| **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** | It was observed that the fire alarm signage was not posted in the chemical storage room. |
| **Recommendations for Immediate Action** | Ensure that the fire alarm call point in the chemical storage room is clearly identified with appropriate signage in accordance with applicable fire safety requirements, and that the signage remains visible and unobstructed at all times. |
| **Recommendations for Sustainable Improvement** | |
| **Compliance Classifications** | Immediate Action Required |
| **Local Law** | Regulation on Protection of Buildings from Fire – Buildings shall be equipped with fire detection and alarm systems appropriate to the fire risk, and alarm signals shall be audible and/or visible in all areas of the building to ensure timely warning and safe evacuation. |

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| **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** | The factory provided PPE training to the workers. However, it was observed that workers in the chemical spray and washing area were not wearing safety glasses. |

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| **Recommendations for Immediate Action** | Ensure that all workers in the chemical spray and washing area wear appropriate safety glasses at all times, and that PPE requirements are enforced through supervision, training, and routine compliance monitoring. |
| **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 or adequately controlled by collective protective measures or work organization, employers shall provide suitable personal protective equipment and ensure that employees use it correctly. |

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| **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** | It was observed that the storage area for chemicals used in the chemical spraying section was dark and lacked sufficient illumination, while indoor temperature measurements taken in February indicated high heat levels in the washing area that employees described as very hot, noting the assessments were not extended to warmer months to fully evaluate the working environment. |
| **Recommendations for Immediate Action** | 1) Ensure that chemicals used in the spraying process are stored in a designated, well-ventilated, adequately illuminated, and organized chemical storage area, away from production equipment, and that storage conditions comply with chemical safety requirements.<br>2) Ensure that indoor temperature and thermal comfort assessments are conducted during the warm season or under representative operating conditions, and implement appropriate engineering and administrative controls to reduce heat exposure in the washing area where excessive temperatures are identified. |
| **Recommendations for Sustainable Improvement** | |
| **Compliance Classifications** | Immediate Action Required |

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| **Local Law** | 1) Regulation on Occupational Health and Safety Measures in Working with Chemical Substances – Article 7 – Employers shall ensure that hazardous chemicals are stored, handled, and used in a manner that minimizes risks to workers' health and safety through appropriate workplace arrangements and preventive measures.<br>2) Regulation on Workplace Building and Annexes Health and Safety Measures – Annex I – Workplaces shall maintain thermal conditions appropriate to the nature of the work and the physical demands placed on employees, ensuring a healthy and suitable working environment. |

| Hours Of Work (HOW) | |
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| **Benchmark ID** | HOW.2 |
| **Benchmark Details** | Workers shall be entitled to at least 24 consecutive hours of rest in every seven- day period. If workers must work on a rest day, an alternative consecutive 24 hours must be provided within that same seven-day period or immediately following. |
| **Finding Details** | Attendance records showed that six out of nine sampled employees worked on their rest days a total of 31 times, reaching a maximum of 13 consecutive days worked. Specifically, weekend work occurred twice for one employee in March 2026, six times for five employees in April, six times for five employees in May, and seven times for four employees in June. |
| **Recommendations for Immediate Action** | Ensure that worker provided at least one day-off after six consecutive days. |
| **Recommendations for Sustainable Improvement** | |
| **Compliance Classifications** | Immediate Action Required |
| **Local Law** | Labour Law No. 4857 – Article 46 (Weekly Rest Day) – Employees who have worked on the prescribed working days are entitled to an uninterrupted minimum of 24 consecutive hours of weekly rest within each seven-day period. Employees must be granted their weekly rest day with pay in accordance with the law. |