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)	Amer Sports - 5
Country	Türkiye
Assessment Date	7/21/2026
Assessment Company	Key of Sustainability Denetim Ltd. - 200004

Workforce Summary

Number of Workers	198
Percentage female	43 %
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)	4
Employment Relationship (ER)	8
Hours Of Work (HOW)	2
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	5
Sustainable Improvement Required	10
Uncorroborated Risk of Non-Compliance	0
Notable Feature	0

Assessment Results

Compensation (C)	
Benchmark ID	C.9.3
Benchmark Details	Employees shall be compensated for overtime hours at such premium rate as is legally required in the producing country
Finding Details	During the week, the factory substitutes hours not worked during normal work periods with overtime hours, on a one-to-one basis. For example, if an employee is absent for 2 hours out of a normal 45-hour week and works 2 hours of overtime, these two hours cancel each other out. Instead, the unworked weekly hours should be deducted from the employee's regular salary, and overtime hours should be increased and paid at 50%. This is verified via document review and worker interviews.
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required
Local Law	

Employment Relationship (ER)	
Benchmark ID	ER.16.3
Benchmark Details	Where temporary or permanent layoffs are unavoidable, a plan should be developed and implemented that mitigates the adverse effects of such changes on workers and their communities.
Finding Details	The factory has not developed and communicated to the workers a plan that mitigates the adverse effects of layoffs in cases of unavoidable layoffs. The factory had an experience of downsizing in December 2025, with 104 workers laid off due to reduced production capacity. The retrenchment process complied with all legal aspects and requirements.
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required

Local Law

Benchmark ID	ER.18.4
Benchmark Details	The disciplinary system shall include a third party witness during imposition, and an appeal process.
Finding Details	The factory's disciplinary procedures do not include workers' right to appeal the disciplinary action or workers' ability to have a third party witness during the imposition of disciplinary actions.
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	There is no orientation handbook, so it is not provided to employees upon hire.
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	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	

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 factory has obtained a Building Using Permit for a building of 13473,48 m2. The total area of the factory, however, is 17000 m2. The top floor of the building (3.527,52 m2) was not included in the Building Using Permit. The Business Opening and Operation permit also does not cover the top floor. However, the top floor was covered during the fire brigade assessment report.
Recommendations for Immediate Action	Ensure that top floor is included to Business and Operation permit.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	Law No. 3572 on Business Opening and Operating Licenses and the Regulation on Business Opening and Operating Licenses require workplaces to obtain and maintain a valid Business Opening and Operating License covering all areas where business activities are conducted.

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 has 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. However, personnel development that encourages ongoing training is not in progress. There are only the written policies/procedures.
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	The factory does not have policies and procedures on performance reviews that include steps and processes, linkages to job grading, nondiscrimination, written feedback. The factory does not conduct performance reviews for workers.
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	Worker representatives were consulted during the annual leave decisions and last year's mass dismissal decision, but are not consulted in the decision-making process concerning wages at the factory.
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required
Local Law	

Health, Safety And Environment (HSE)

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	The emergency exit corridors on the -2 and ground floors both don't have push-bar doors.
Recommendations for Immediate Action	Equip all emergency exit doors with properly functioning push-bar (panic bar) devices, keep them remain unobstructed and unlocked during working hours, and regularly inspect and maintain them to ensure immediate opening in an emergency.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	Regulation on Protection of Buildings from Fire – Emergency exit doors shall be readily openable by occupants without the use of a key or special knowledge and shall allow immediate evacuation in case of emergency.

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	

Benchmark ID	HSE.1
Benchmark Details	Employers shall comply with all national laws, regulations and procedures concerning health, safety, and the environment.

Finding Details	According to the factory's occupational safety and health (OSH) evaluation, the noise level in the pattern washing/cleaning area of the printing department has not been assessed. Furthermore, the noise level in the plate washing/cleaning area of the printing department was not included in the records of indoor noise measurements.
Recommendations for Immediate Action	Include the pattern washing/cleaning area in the noise risk assessment and conduct noise measurements in this area. Based on the assessment results, implement appropriate control measures and provide hearing protection where required.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	Regulation on the Protection of Employees from Risks Related to Noise – Employers shall assess and, where necessary, measure the levels of noise to which employees are exposed, taking into account all work areas where noise exposure may occur.

Benchmark ID	HSE.17.2
Benchmark Details	Employers shall train workers in proper lifting techniques, and items such as lifting belts shall be provided.
Finding Details	The factory has not provided ergonomic mats to quality control, ironing, and packaging workers who constantly stand at their stations.
Recommendations for Immediate Action	Provide ergonomic anti-fatigue mats for employees who perform prolonged standing work. Ensure all standing workstations are evaluated and improved in accordance with ergonomic principles to reduce fatigue and musculoskeletal risks.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	Regulation on Workplace Building and Annexes Health and Safety Measures – Annex I – Workstations shall be designed and arranged in accordance with ergonomic principles, taking into account the nature of the work and the physical characteristics of employees, to prevent health risks arising from working conditions.

Hours Of Work (HOW)

Benchmark ID	HOW.11.1

Benchmark Details	Employers shall provide workers with paid annual leave as required under national laws, regulations and procedures.
Finding Details	In the review of annual leave records, the assessment found that 16 out of 25 employees had not used their leaves from previous years. It has been determined that the maximum period is 36.5 days. It has been observed that the factory did not restrict employees from taking annual leave. Instead, it reflects a weakness in the annual leave planning and monitoring process. The factory's leave management system was not sufficiently effective to ensure that accrued annual leave was scheduled and used within the applicable period, resulting in the accumulation of unused leave balances.
Recommendations for Immediate Action	Ensure that annual leave is provided for all days that workers are entitled to.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	Labour Law No. 4857 – Article 56 (Use of Annual Paid Leave) – Annual paid leave shall be granted by the employer within the relevant leave year. Employees shall be enabled to take their accrued annual leave in accordance with the law.

Benchmark ID	HOW.14
Benchmark Details	Employers shall provide workers taking annual leave their normal or average wages for the full period of annual leave in advance, unless specified differently under national laws, regulations and procedures.
Finding Details	As the factory's annual leave includes 2 weekend days, under local law it should be considered as 5 days of annual leave per week. However, the assessment found that 6 days of leave are deducted from annual leave.
Recommendations for Immediate Action	Ensure that annual leave calculation reflects only working days missed.
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required

Local Law	Article 56 – Annual Paid Leave National holidays, weekly rest days and public holidays which coincide with the duration of annual leave may not be included in the annual leave period. Court of Cassation (Yargıtay) 22nd Civil Chamber Case No.: 2018/11064 Decision No.: 2018/22576 Principle established by the Court (English): Weekly rest days falling within the annual paid leave period cannot be deducted from the employee's annual leave entitlement. Where the workplace operates on a five-day workweek with two weekly rest days, both weekly rest days must be excluded from the annual leave calculation.