SMETA
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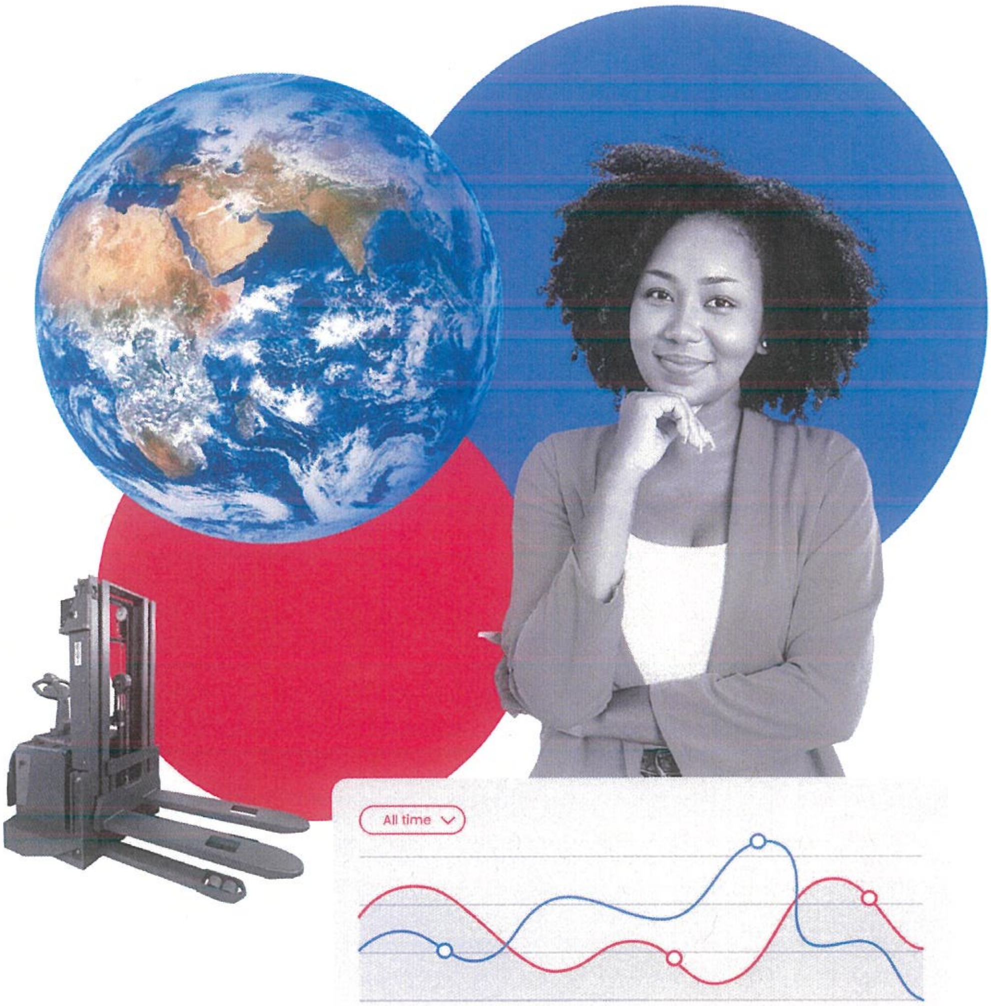
Sedex Members Ethical Trade Audit Report

Version 7



Sedex, 5 Old Bailey, London, EC4M 7BA, United Kingdom

Contents

Audit content

(1) A SMETA audit was conducted which included some or all of labour standards, health and safety, environment and business ethics. The SMETA minimum requirements were applied and the SMETA auditor manual was followed. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA methodology are stated (with reasons for deviation) in the SMETA declaration.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the code areas below.

2-pillar audits include:

- Labour standards:
  - 0. Enabling accurate assessment
  - 1. Employment is freely chosen
  - 1.A. Responsible recruitment and entitlement to work
  - 2. Freedom of association and right to collective bargaining are respected
  - 4. Child labour shall not be used
  - 5. Legal wages are paid
  - 5.A. Living wages are paid
  - 6. Working hours are not excessive
  - 7. No discrimination is practiced
  - 8. Regular employment is provided
  - 8.A. Sub-contracting and homeworkers are used responsibly
  - 9. No harsh or inhumane treatment is allowed
- Health and safety:
  - 3. Working conditions are safe and hygienic
- Environment:
  - 10.A. Environment 2-pillar

4-pillar audits include, in addition to the above:

- Environment:
  - 10.B. Environment 4-pillar
- Business ethics:
  - 10.C. Business ethics

(2) Where appropriate, non-compliances or non-conformances were raised where either local law or the base code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.

(3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

Audit details

Site details

Sedex site reference	ZS1000086402	**Site name**	Kaptan Demir Celik End ve Tic A S
Business name	KAPTAN DEMIR CELIK END ve Tic A.S.	**Site address**	59740 Sultanköy mahallesi Seymen yolu cad no 31/1 Kaptan demir çelik, Marmara Ereğlisi, TR

Audit details

Sedex company reference	ZC5000072851	**Auditor company name**	BSI Group
Audit company address	Max House, Tower – C, 7th Floor, Bahapur, Okhla Industrial Estate, Phase-3, New Delhi, IN, 110020		
Date of audit	2025-09-17	**Audit conducted by**	Yilmaz Pirli
Audit pillars	Labour Standards | Health and safety | Environment 4-Pillar | Business ethics		

Time in and out

	Day 1	Day 2	Day 3	Day 4
In	09:00	09:00	09:00	09:00
Out	17:30	17:30	17:30	13:00

← Contents

Findings →

Audit type	Full initial
Was the audit announced?	Unannounced
Was the Sedex SAQ available for review?	Yes
Who signed and agreed CAPR?	Mr. Cenk Ciritci / Integrated Management Systems Deputy Manager
Any conflicting information SAQ/Pre-Audit Info	Yes The Facility refused to share workers' working hours and wage records for the selected months of January 2025 and November 2024. Therefore there is a Transperancy issue in the Audit.
Is further information available?	No

Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No

Reason for absence at the opening meeting	The management and chief employee representative attended the opening meeting. The facility has freely elected employee representatives. The Union is not mandatory in Turkey Legal System. Since there is no union, there is no union representative.
Reason for absence during the audit	The management and chief employee representative were present at the audit. The facility has freely elected employee representatives. The Union is not mandatory in Turkey Legal System. Since there is no union, there is no union representative.

Reason for absence at the closing meeting	The management and chief employee representative attended the closing meeting. The facility has freely elected employee representatives. The Union is not mandatory in Turkey Legal System. Since there is no union, there is no union representative.

SMETA declaration

Auditor team

SMETA declaration	I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual. 1. Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform. 2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question. This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information be gathered and considered from records review, worker interviews, management interviews and visual observation. More information is gathered during the social audit process than is provided here. The audit process is a sampling exercise only and does not guarantee that the audited site prior, during or post–audit, are in full compliance with the Code being audited against. The provisions of this Code constitute minimum and not maximum standards and this Code should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable laws and where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection. The ownership of this report remains with the party who has paid for the audit. Release permission must be provided by the owner prior to release to any third parties.
Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)	The facility did not share the time records of workers for May 2025 and November 2024. Therefore related verifications could not be completed.

Lead auditor	Yilmaz Pirli	**APSCA Number**	21703766
Additional auditor			
Date of declaration	2025-09-20		

Site representation

Declaration	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
Full name	Mr. Cenk Ciritci
Title	Integrated Management Systems Deputy Manager
Date of declaration	2025-09-20

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
0. Enabling accurate assessment	0.A Allow the auditor to conduct and complete...	Base code	NC ZAF601114216
3. Working conditions are safe and hygienic	3.A Ensure a safe working environment. Put in...		GE ZAF601114224
	3.K Ensure that all premises are safe and hav...	Local law	NC ZAF601114225
5. Legal wages are paid	5.A Ensure that all workers (including non-em...	Local law Base code	NC ZAF601114217
	5.B Ensure that workers receive the insurance...		GE ZAF601114223
5.A. Living wages are paid	5.A.A Review workers' total pay including ben...	Base code	NC ZAF601114218
	5.A.B Put in place a wage improvement plan th...	Base code	NC ZAF601114219
6. Working hours are not excessive	6.A Ensure working hours (including overtime)...	Local law Base code	NC ZAF601114220
10.A. Environment 2-Pillar	10.A.A Remain aware of the local, regional an...		GE ZAF601114221
10.B. Environment 4-Pillar	10.B.E Identify and monitor potential negativ...		GE ZAF601114222

← Contents

Management systems →

Management systems

	Policies and procedures	Resources	Communication and training	Monitoring
1. Employment is freely chosen	✓	✓	✓	✓
1.A. Responsible recruitment and entitlement to work	✓	✓	✓	✓
2. Freedom of association and right to collective bargaining are respected	✓	✓	✓	✓
3. Working conditions are safe and hygienic	ⓘ	ⓘ	✓	⚠
4. Child labour shall not be used	✓	✓	✓	✓
5. Legal wages are paid	✗	⚠	✗	✗
6. Working hours are not excessive	✗	✗	⚠	✗
7. No discrimination is practiced	✓	✓	✓	✓
8. Regular employment is provided	✓	✓	✓	✓

✗ Not addressed

⚠ Fundamental improvements required

ⓘ Some improvements recommended

✓ Robust management systems

← Summary of findings

Site details →

	Policies and procedures	Resources	Communication and training	Monitoring
8.A. Sub-contracting and homeworkers are used responsibly	✓	✓	✓	✓
9. No harsh or inhumane treatment is allowed	✓	✓	✓	✓
10.A. Environment 2-Pillar	✓	✓	✓	✓
10.C. Business ethics	✓	✓	✓	✓

✗ Not addressed

⚠ Fundamental improvements required

ⓘ Some improvements recommended

✓ Robust management systems

Site details

Company and site details

Sedex company reference	ZC5000072851	
Sedex site reference	ZS1000086402	
Company name	KAPTAN DEMIR CELIK END ve Tic A.S.	
Business ownership type	GOODS	
Site name	Kaptan Demir Celik End ve Tic A S	
Site name in local language	KAPTAN DEMIR CELIK END. VE TIC. A.S	
GPS location	**GPS address**	Sultanköy mahallesi Seymen yolu cad no 31/1, M.Ereglisi - Tekirdag - Turkey
	Coordinates	41,01406842194 N, 27,9531777320 E
Is the worksite in a remote location, far from habitation?	Yes The facility is in a special Industrial Zone of Tekirdag Turkey. About 10 km away from the city center.	
Site contact	**Contact name**	Mr. Cenk Ciritci
	Job title	Integrated Management System Deputy Manager
	Phone number	+905322702709
	Email	cciritci@kaptandemir.com.tr

Company and site details

Applicable business and other legally required business license numbers and documents	1-Business Opening License (No: 60 /Date: 06/05/2003). 2-Building Usage Permits: a.No: 2002/2, Date: 20/03/2002, Total: 38231.7m2 b.No: 2024/1 Date: 17/05/2024, Total: 59690.25m2 c.No: 2024/2, Date: 20/11/2024, Total: 4368.86m2 d.No: 2023/03, Date: 28/08/2023, Total: 52203.66m2 3- Building Registration Certificate: No: PATBEUBO, Date: 14/08/2018, Total: 10104m2. (Overall TOTAL: 164598.47m2.) 4-Firefighting Official Report (No: M593MAR0100000/28.01-210 /Date: 18/02/2013). (Total: 62805m2) 5-Trade Registration Gazette (No: 11336, Date: 22/05/2025).

Site activities

Site function	Factory Processing/Manufacturer	
Site activities	**Primary**	Casting of iron and steel
	Secondary	
	Other	
Product type	The facility produces liquid steel from steel scrap. Production process including: raw materials arrival, electrical arc furnace, Melting, Leadle Furnace, Continue Casting, ReBar Mill, Re-Heating Furnace, Wire Rod Mill, Quality control and dispatch. Yearly capacity is 1,128,910 Kg. Confirmed with the official Capacity Report (20/08/2025, No: 194542).	
Process overview	The facility produces liquid steel from steel scrap. Production process including: raw materials arrival, electrical arc furnace, Melting, Leadle Furnace, Continue Casting, REBar Mill, Re-Heating Furnace, Wire Rod Mill, Quality control and dispatch. The main equipment used are; Overhead Crane, Scrap Transfer Car, Forklift, Steel Basket, Radiation Detector, Transformer, Spectrometer, XRF Analyzer (X-ray Fluorescence Analyzer), LECO Carbon-Sulfur Analyzer.	
What level of mechanization best describes the work at this site?	Fair mechanisation / manual Labour	

Site scope

Is the audited site a physically continuous area?	Yes
What is the area of audited site to its boundary?	164598m^2

← Site details

Worker analysis →

Site scope

Building 1	**Last construction works on site**	2024
	If building is shared, provide details	N/A
	Number of floors	1
	Description of floor activities	Building 1- Wire Rodd Production Building and Warehouse: 1 floor. Offices, Toilets, Pulpits, Reheating Furnace, Strands, Packaging, Quality Control, Laboratory, Warehouse and Maintenance room.
Building 2	**Last construction works on site**	2002
	If building is shared, provide details	N/A
	Number of floors	1
	Description of floor activities	Building 2- Rolling Mill Production Building: 1 Floor. Offices, Toilets, Pulpits, Reheating Furnace, Strands, Packaging, Quality Control, Laboratory, Warehouse and Maintenance room.
Building 3	**Last construction works on site**	2002
	If building is shared, provide details	N/A
	Number of floors	3
	Description of floor activities	Building 3- Melting Shop Building and Administrative Office Building: 3 Floors. Ground Floor: Toilets, Offices, Melting Shop Production Units, Electric Arc Furnace, Ladle Furnace, CCM, Warehouse. 1st Floor: Offices, Toilets, Meeting Room, Kitchenette. 2nd Floor: Offices, Toilets, Meeting Room, EAF Operation Room.

Site scope

Building 4	**Last construction works on site**	2018
	If building is shared, provide details	N/A
	Number of floors	1
	Description of floor activities	Building 4- Warehouse: 1 Floor. Scrap Raw Material storage.
Building 5	**Last construction works on site**	2002
	If building is shared, provide details	N/A
	Number of floors	1
	Description of floor activities	Building 5- Warehouse: 1 Floor. For goods. Offices. Toilets.
Building 6	**Last construction works on site**	2018
	If building is shared, provide details	N/A
	Number of floors	1
	Description of floor activities	Building 6- Dining Room add Medical Units building: 1 Floor: Dining Room, Kitchen, Toilets, Offices, Medical room, Training Room.

Is there any difference between the site scope of the audit and the Sedex site profile?	No
Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?	No

← Site details

Worker analysis →

Site scope

Is any activity conducted onsite not included within the scope of the audit?	No

Worker accommodation and transport

Are there any site-provided worker accommodation buildings?	No
Does the site organise worker transport to the worksite?	Site provided Workers are using sub-contractor service buses for transportation. The service company is named Ateş Tur Turizm Ltd. There is a special contract between the facility and the company. Seen. Checked. The conditions of vehicles and necessary permits are followed by the Facility. Seen. Checked.

Work patterns

Approximate workers on site per month (% of peak)

January	95-100%	**February**	95-100%
March	95-100%	**April**	95-100%
May	95-100%	**June**	95-100%
July	95-100%	**August**	95-100%
September	95-100%	**October**	95-100%
November	95-100%	**December**	95-100%

Is there any night shift work at the site?	Yes There are 3 shifts for the workers. 08:00-16:00, 16:00-24:00 and 24:00-08:00. All shifts have 30 minutes of meal breaks. Daily regular working hour is 7,5 hours net. 6 days of regular week working days. Regular working hour per week is 45 hours net in total.

Work patterns

What percentage of the workforce, including temporary and agency workers, work during the night shift?	25%
Was the audit conducted across all shift times, and did it include a representative sample of workers from each shift time in interviews and sampling?	Yes The Auditor sampled all shift times of the Facility.

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact?	ISO 45001 (OHS), ISO 50001 (Energy management), ISO 14001 (Environmental management), Other management system certification The facility have ISO 10002:2018 and ISO 26000:2010
Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community?	No No. The site has not assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community.
Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?	No No, no Human Rights Impact Assessment (HRIA) was ever conducted at this site.

← Site details

Worker analysis →

Worker analysis

Gender disaggregated data available	Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	546	9	-	555

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	546	9	-	555
Temporary or fixed term employees	0	0	-	0
Agency or subcontracted workers	0	0	-	0
Seasonal workers	0	0	-	0
Self-employed workers	0	0	-	0
Informal workers including home workers	0	0	-	0
Apprentices, trainees or interns	8	0	-	8

* % of total workforce

← Site details

Worker interviews →

Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	0	0	-	0
International migrant workers	0	0	-	0
Total migrant workers	0	0	-	0

* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from

There is no workers have migrated internally.

Workers by age

	Men	Women	Other	Total
18 - 24 years old	41	0	-	41
15 - 17 years old	0	0	-	0
Under 15 years old	0	0	-	0

* % of total workforce

Is the worker analysis data relevant for peak season and current to the audit?	Yes
Please list the nationalities of all workers, with the three most common nationalities listed first	Turkish

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Turkish	98%	2%	-	100%

Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0	0	-	0
Workers paid based on a mix of 'piece work' and hourly rate	0	0	-	0
Workers paid hourly / daily rate	0	0	-	0
Salaried workers	546	9	-	555

* % of total workforce

← Worker analysis

Worker interviews →

Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0	0	-	0
Paid weekly	0	0	-	0
Paid monthly	546	9	-	555
Other	0	0	-	0

* % of total workforce

If other payment cycle entered, please provide details No other payment

People in managerial, supervisorial and administrative roles

	Men	Women	Other	Total
Employees in management positions	27	4	-	31
Supervisors or team leaders	75	8	-	83
Administrative staff	173	7	-	180

← Worker analysis

Worker interviews →

Worker interview summary

Gender disaggregated data available	Men and women
Which methods of worker engagement were used?	Individual interviews Group interviews

Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?	
Was the interview sample representative of all types of nationality and employment types of workers?	Yes
Was the interview sample representative of the gender composition of the workforce?	Yes
Number and size of group interviews	6 group of 5 workers = 30 Total
Did workers understand the purpose of the audit?	Yes
Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers?	Yes

← Worker analysis
Measuring workplace impact →

Was there any indication that workers had been 'coached' in how they should respond to questions?	No
What was the general attitude of the workers towards their workplace?	Favorable

Attitude of workers

In which areas did workers raise significant concerns or complaints?	Other (provide details) During the audit, interview with workers and worker representatives it was observed that workers did not raise significant concerns or complaints for the areas above.
What did the workers like the most about working at this site?	Communication (e.g. from management) Facilities (e.g. rest area, recreation, canteen) Hours worked, rest days or breaks Work atmosphere (e.g. treatment by supervisors)
Additional comments	According to interviews with the workers, they mentioned above ticked issues.
Attitude of workers' committee/union representatives	The chief Worker representative was found to be well versed with the requirements of social audit, he was very co-operative and transparent during the course of the audit.
Attitude of managers	The management was found to be well versed with the requirements of social audit, management was very co-operative and transparent during the course of the audit. They were respective towards findings. The management approach was found to be positive.

Workers interviewed by type

	Total
Permanent workers	42

Workers interviewed by type

Temporary or fixed-term employees	0
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	42

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	30	0	-	30
Workers interviewed individually	11	1	-	12

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	0	0	-	0
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	0	0	-	0

Measuring workplace impact

Gender disaggregated data available	Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	8.21%	0.31%	-	8.52%
Last full calendar year (2024)	8.73%	0.34%	-	9.07%
Previous full calendar year (2023)	8.4%	0.32%	-	8.72%

* Number of workers leaving in last 12 months as a % of average total number of workers on site over the year.

Rate of absenteeism (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.66%	0.0%	-	0.66%
Last full calendar year (2024)	0.4%	0.0%	-	0.4%
Previous full calendar year (2023)	0.19%	0.0%	-	0.19%

Number of days lost through job absence in the year, calculated as: (Number of days lost through job absence in the year) / [(Number of employees on 1st day of the year + Number of employees on the last day of the year) / 2] * (Number of available workdays in the year).

Are accidents recorded?	Yes In case of any work accident, the facility has ability to record the accidents by making legal notifications. Previous records seen. Checked.

← Worker interviews

Code area 0 →

Annual number of work related accidents and injuries (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	2.72%	0.0%	-	2.72%
Last full calendar year (2024)	10.68%	2.94%	-	13.62%
Previous full calendar year (2023)	9.55%	2.94%	-	12.49%

* Calculated as (number of work related accidents and injuries * 100) / number of total workers.

Lost day work cases (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	3.5%	0.0%	-	3.5%
Last full calendar year (2024)	18.4%	0.9%	-	19.2%
Previous full calendar year (2023)	21.3%	6.7%	-	28.0%

* Calculated as (number of lost days due to work accidents and work related injuries * 100) / number of total workers.

Percentage of workers that work on average more than 48 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%

← Worker interviews

Code area 0 →

Percentage of workers that work on average more than 48 total hours in a given week

Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

Percentage of workers that work on average more than 60 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
0. Enabling accurate assessment	0.A Allow the auditor to conduct and complete...	Base code	NC ZAF601114216

Systems and evidence examined to validate this code section

Current Systems;
NC- The facility did not share employee time records for May 2025 and November 2024. The facility stated that these records were deleted after three months to ensure information security and reduce system load, and that efforts were underway to restore them. Because the auditor was unable to access the data in question, they were unable to fully verify the time records and other relevant information.
The facility is in a special Organized Industrial Zone of Tekirdag Turkey. About 10 km away from the city center. All land and buildings are belonged to the Facility. Total land area is 515,969 m2. Total covered building areas is 164,598.47m2.
Confirmed with:
1-Business Opening License (No: 60 /Date: 06/05/2003).
2-Building Usage Permits:
a.No: 2002/2, Date: 20/03/2002, Total: 38231.7m2
b.No: 2024/1 Date: 17/05/2024, Total: 59690.25m2
c.No: 2024/2, Date: 20/11/2024, Total: 4368.86m2
d.No: 2023/03, Date: 28/08/2023, Total: 52203.66m2
3-Building Registration Certificates: No: PATBEUBO, Date: 14/08/2018, Total: 10104m2. (Overall TOTAL: 164598.47m2.)
4-Firefighting Official Report (No: M593MAR0100000/28.01-210 /Date: 18/02/2013). (Total: 62805m2)
5-Trade Registration Gazette (No: 11336, Date: 22/05/2025).

← Measuring workplace impact

Code area 1 →

Findings: non-compliances

ZAF601114216

Non-compliance

Due 2025-09-26

Code area

0 Enabling accurate assessment

Workplace requirement

0.A Allow the auditor to conduct and complete the audit without obstruction to all requested documents, interviewees and the facility itself (including outbuildings and accommodation). Provide the auditor with genuine and authentic records.

Issue title

1 - The audit was fully not completed due to an intentionally obstructive practice (e.g. the auditor was denied access to relevant documents or areas of the site, permission to interview workers, interference from consultant/ external stakeholder etc.)

Description

Tesis Mayıs 2025 ve Kasım 2024 aylarına ait çalışanların zaman kayıtlarını paylaşmamıştır. Tesis bilgi güvenliği ve sistem üzerindeki yüklerin azaltılması için söz konusu kayıtların 3 aydan sonra silindiğini, tekrar geri getirilmesi için çalışıldığını beyan etmiştir. Tetkikçi söz konusu verilere ulaşamadığı için zaman kayıtlarını ve ilgili diğer alanlardaki bilgileri tam olarak doğrulayamamıştır. The facility did not share employee time records for May 2025 and November 2024. The facility stated that these records were deleted after three months to ensure information security and reduce system load, and that efforts were underway to restore them. Because the auditor was unable to access the data in question, they were unable to fully verify the time records and other relevant information.

Corrective and preventative actions

Zaman kayıtlarının tamamına ulaşım sağlanmalı ve Tetkikçi ile paylaşılmalıdır. All time records must be accessible and shared with the Auditor.

Status

Open*

Time given to resolve

Immediate

Verification method

Follow up audit

Area of non-compliance/non-conformance

Base code

* PDF generated at 11:00 (UTC) on 26 Sept 2025. View this finding on the Sedex platform for live updates and closure details.

← Code area 0

Code area 1 →

0. Enabling accurate assessment

Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment?	No
Did any workers selected by the auditor decline to be interviewed?	No

1. Employment is freely chosen

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1- Ensure Workplace Requirements are met = Robust Duing the Audit, it was confirmed with management & worker interviews and document checks that the management system for the "Employment is freely chosen" is well established and followed. 2- Appoint a manager with sufficient seniority = Robust Mr. Cenk Ciritci (Integrated Management System Deputy Manager) was appointed responsible person for the purpose. The special letter of management for the appointment seen. Checked. Detailed Job Descriptions exist. 3- Communicate and train = Robust The facility developed Policy and Procedures for the purpose. The facility communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. 4- Monitor the effectiveness = Robust The facility have sufficient monitoring processes and measures for the purpose. Regular internal audits are conducted. The policies and procedures are revised every year. The trainings are repeated every year. Records seen. Checked.

← Code area 0

Code area 1.A →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

No findings

Systems and evidence examined to validate this code section	Current Systems; There was no forced or bonded labor at the company. Movement of employees at the facility were not limited. Employees have free access to toilets and drinkable water. Overtimes are always performed on voluntary basis. Employment was freely chosen. Workers were free to leave and were not required to lodge deposits or ID papers with their employers. Confirmed with the: Personnel files and payroll records (42 sampled workers) (The payroll records chosen from July 2025 (Last Social Insurance and Wages Payment Month), May 2025 (Peak month) and November 2024 (Off-Peak Season). Disciplinary records 42 sampled employees documents and records.

← Code area 0

Code area 1.A →

1. Employment is freely chosen

Data points

If required under local law, is there a published 'modern slavery' or similar statement?	Not Applicable
Does the site utilise any workers who are prisoners?	No
Does the site use the labour of persons required to work under any government scheme?	No

← Code area 1

Code area 1.A →

1.A. Responsible recruitment and entitlement to work

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1- Ensure Workplace Requirements are met = Robust Duing the Audit, it was confirmed with management & worker interviews and document checks that the management system for the "Responsible recruitment and entitlement to work" is well established and followed. 2- Appoint a manager with sufficient seniority = Robust Mr. Cenk Ciritci (Integrated Management System Deputy Manager) was appointed responsible person for the purpose. The special letter of management for the appointment seen. Checked. Detailed Job Descriptions exist. 3- Communicate and train = Robust The facility developed Policy and Procedures for the purpose. The facility communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. 4- Monitor the effectiveness = Robust The facility have sufficient monitoring processes and measures for the purpose. Regular internal audits are conducted. The policies and procedures are revised every year. The trainings are repeated every year. Records seen. Checked.

← Code area 1

Code area 2 →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

Systems and evidence examined to validate this code section	Current Systems; It has been observed that all employees have insurance records. Obligations to employees under labor or social security laws and regulations arising from the regular employment relationship shall not be avoided through. The facility has a full understanding of the entire recruitment process and assesses and against legal and ethical requirements. There are no contract or subcontracted workers in the Facility. However, in the recruitment procedure established by the Facility, a commitment is made to comply with local legal requirements. There was no migrant workers in the facility. Recruitment procedures are carried out by the Facility. The Facility didn't use the employment agency. Employment contracts comply with legal requirements. Confirmed with: Document review (42 sampled employees personnel files) and worker declarations.

← Code area 1

Code area 2 →

1.A. Responsible recruitment and entitlement to work

Data points

Labour hire

Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes?	Workers are recruited, selected, and hired directly by our company
How do the labour providers recruit and hire workers?	N/A - Recruitment providers not used
Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey?	0
Are there any subcontracted workers (excluding dispatched labour) on site?	No
Were all non-employee (e.g. agency or subcontracted) workers included within the scope of this audit for the purpose of document review and (if onsite on date of audit) interview?	Not Applicable
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Not Applicable

Migrant workers

Do any workers migrate across international borders to work at this site?	No

← Code area 1.A

Code area 2 →

Percentage of workers that are migrant	0%
Do any workers migrate from other states, provinces or regions within the country to work at this site?	No

Recruitment fees

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process?	No No such situation was noted.
Were recruitment fees or costs identified during worker interviews?	No No such situation was noted.

2. Freedom of association and right to collective bargaining are respected

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1- Ensure Workplace Requirements are met = Robust Duing the Audit, it was confirmed with management & worker interviews and document checks that the management system for the "Freedom of association and right to collective bargaining are respected" is well established and followed. 2- Appoint a manager with sufficient seniority = Robust Mr. Cenk Ciritci (Integrated Management System Deputy Manager) was appointed responsible person for the purpose. The special letter of management for the appointment seen. Checked. Detailed Job Descriptions exist. 3- Communicate and train = Robust The facility developed Policy and Procedures for the purpose. The facility communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. 4- Monitor the effectiveness = Robust The facility have sufficient monitoring processes and measures for the purpose. Regular internal audits are conducted. The policies and procedures are revised every year. The trainings are repeated every year. Records seen. Checked.

← Code area 1.A

Code area 3 →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section	Current Systems; In the Social Compliance Policy created at the Facility, there is the phrase; "Freedom of Association and Collective Bargaining: We undertake to respect the right of employees to join unions and bargain collectively, and the right to represent freely and democratically through employee representatives." There is no union in the Facility. There are 4 employee representatives available in the Facility. There was special Appointment letter from the Management on 01/02/2023. Confirmed with: Document checks. Management interview, Worker interview, Worker representative interview.

← Code area 1.A

Code area 3 →

2. Freedom of association and right to collective bargaining are respected

Data points

Are trade unions allowed by law in the national context?	Yes
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	Not Applicable
Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	Yes
Are the worker representatives freely elected by the workforce as a whole?	No
Does union/worker committee membership reflect the gender composition of the workforce?	Yes
Does the membership reflect the nationality composition of the workforce?	Yes
Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years?	No

← Code area 2

Code area 3 →

3. Working conditions are safe and hygienic

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required
Explanation for management systems grades	1- Ensure Workplace Requirements are met = Some Improvements Recommended. Duing the Audit, it was confirmed with management & worker interviews and document checks that the management system for the "Working conditions are safe and hygienic" is established and followed. But needs some improvements for following the necessary permits (e.g. Fire Report) 2- Appoint a manager with sufficient seniority = Some Improvements Recommended. Mr. Cenk Ciritci (Integrated Management System Deputy Manager) was appointed responsible person for the purpose. The special letter of management for the appointment seen. Checked. Detailed Job Descriptions exist. But needs some improvements for following the necessary permits (e.g. Fire Report) 3- Communicate and train = Robust The facility developed Policy and Procedures for the purpose. The facility communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. 4- Monitor the effectiveness = Fundamental Improvements Required The facility has monitoring processes and measures for the purpose. But needs fundamental improvements for following the necessary permits (e.g. Fire Report). Regular internal audits are conducted. The policies and procedures are revised every year. The trainings are repeated every year. Records seen. Checked.

← Code area 2

Code area 4 →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.A Ensure a safe working environment. Put in...		GE ZAF601114224
	3.K Ensure that all premises are safe and hav...	Local law	NC ZAF601114225

← Code area 2

Code area 4 →

Systems and evidence examined to validate this code section	Current Sytems: The auditor controlled the expiration dates of the solutions in the medicine cabinet on the day of the audit and did not find any inappropriate conditions. Risk analysis has been prepared in accordance with the 10 X 10 X 100 Fine Kinney L Matrix. Revised on 14/03/2025. During the audit, the auditor examined the risk analyses, and it was observed that the risk analysis was updated with each new machine addition or location change and a risk analysis was created for special groups. The emergency plan is divided into general and field. General emergency plan date: 01/01/2025. Then last Emergency and Fire Drill was organized for Dispatch, Weighing and Security departments on 08/06/2025. Drills are organized for each department. Total: 15 workers had attended. Records checked. In the general emergency procedure; 'fire/explosion, flammable and chemical substance leakage, environmental leaks and complaints, major emergencies, threats, sabotage, food poisoning, earthquake, flood, tornado' cases are included. The identification and recommendation book was examined and it was observed that it was kept regularly by occupational health and safety experts. There is a active H & S Committee in the Facility. Total 19 members. Meeting are done periodicaly. (Every month). Last board was on 28/08/2025. Records checked. There is 1 conformity reports for chimneys system in the Facility. The last check was made on 24/03/2025, No: 000511. The authorized engineer stated the report conclusion as appropriate. There are 11 compressors in total in the Facility. The last periodic check was made on 21/11/2024, No: 1288242312, and the compressors were approved for use by the authorized engineer for one year. There is 1 conformity reports for boiler/accumulation tanks system in the Facility. The last check was made on 17/11/2024, No: 1288241447. The authorized engineer stated the report conclusion as appropriate. There is 1 conformity reports for hydrofor tanks system in the Facility. The last check was made on 17/11/2024, No: 1288241473. The authorized engineer stated the report conclusion as appropriate. There is 1 report for Electrical wiring in the Facility. The last check was made on 11/12/2024, No: 2023-0428.0008. The authorized engineer stated the report conclusion as appropriate. There is 1 Thermal Comfort report in the Facility. The last periodic check was made on 11/06/2024, No: IR24-068. The authorized engineer stated the report conclusion as/ appropriate. There is 1 Dust report in the Facility. The last periodic check was made on 11/06/2024, No: IR24-0688. The authorized engineer stated the report conclusion as appropriate. There is 1 Noise report in the Facility. The last periodic check was made on

11/06/2024, No: IR24-068. The authorized engineer stated the report conclusion as appropriate.
There is 1 Lighting report in the Facility. The last periodic check was made on 27/01/2025, No: UL-İSG-24112457/1.5. The authorized engineer stated the report conclusion as appropriate.
There is 1 report for grounding in the Facility. The last check was made on 11/12/2024, No: 2023-0428.0007-21. The authorized engineer stated the report conclusion as appropriate.
There is 1 report for Lightining Grounding (Paratoner) in the Facility. The last check was made on 18/12/2024, No: 2024-0614.0258-R1. The authorized engineer stated the report conclusion as appropriate.
There is 70 conformity reports for heavy lifting equipments in the Facility. The last check was made on 17/11/2024, No: 1288241350. The authorized engineer stated the report conclusion as appropriate.
There is 18 conformity reports for forklifts equipments in the Facility. The last check was made on 17/11/2024, No: 1288241398. The authorized engineer stated the report conclusion as appropriate.
There is 1 conformity reports for fire detection system in the Facility. The last check was made on 05/09/2025, No: 3842202501-001. The authorized engineer stated the report conclusion as appropriate.
There is 1 conformity reports for fire equipments in the Facility. The last check was made on 09/09/2025, No: 21901340. The authorized engineer stated the report conclusion as appropriate.
A special Orientation training was organized on 10/01/2025. Records examined. Total 1 workers had attended.
A special Chemical usage training was organized for the special group of workers who directly use/reach the chemicals on 26/05/2025. Records examined. Total 27 workers had attended.
A special Environmental training was organized on 30/06/2025. Records examined. Total 23 workers had attended.
Chemical use training, Basic OHS training, and fire safety training were given to all workers on 30/06/2025. Total 22 people had attended. Seen.
Evacuation drills are held periodically. Last drill was on 25/08/2025, total 29 workers had attended. All shifts were included. Records seen.
A fire brigade unit was established in the Facility. These training and exercises are carried out by the fire department and occupational health and safety units.
There are 132 first-aid-certified personnel in the Facility. Sample first aid certificate seen. Training date: 09/12/2024. The validity period is 3 years. Certificate number: SB.21386336.01
There are 24 Hygen certified personnel in the Facility. Sample Hygen Training certificate seen. Certificate date: 22/07/2025. Certificate number: 25478320250094704895.

← Code area 2

Code area 4 →

There are adequately clean toilets (24 female, 113 male), kitchens, and dining rooms in the Facility.
In addition, the analysis of the drinking water used in the Facility is carried out regularly. (Last Report Date: 02/07/2025, No: 2025-1040-4/5391378271). The facility provides free drinking water.
The Facility does not provide dormitories.
There is 1 occupational health and safety expert assigned to the Facility. (Contract Date: 07/05/2025, No: 20265658)
There is 1 workplace physicians in the Facility. Doctor appointment date: 17/11/2022, No: 10620701).
Confirmed with:
Document review (Machine and equipment periodic controls),
Policies, procedures (Emergency Procedure, Emergency and Fire Safety Procedure etc.)
Training documents (Basic Occupational Health and Safety, Ergonomics, Chemical Use Training etc.)
Worker interview, worker representative interview and management interview
Site tour

Findings: non-compliances

ZAF601114225

Non-compliance

Due 2025-11-25

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.K Ensure that all premises are safe and have valid safety certifications for their current layout and use. If it is currently not possible for a required license or certificate to be obtained, implement inspections by appropriate third parties to ensure building safety.

Issue title

852 - Buildings at the site have neither legal or third party certification of their safety (e.g. none of house property construction safety appraisal reports or construction acceptance reports)

Description

Tesisin sahip olduğu İtfaiye Yangın raporu tüm alanları kapsamamaktadır.
The Fire Department's fire report does not cover all areas of the facility.

Corrective and preventative actions

Tesise uygun ve tüm alanları kapsayan resmi İtfaiye Raporu alınmalıdır. An official fire department report must be obtained, appropriate for the facility and covering all areas.

Local law reference

Regulation Regarding Workplace Opening and Operating License, Clause 5 – Workplace opening and operating license holder workplaces must have below requirements:
(...)
g) in (...) all kind of workplaces having above 30 employees, (...) commercial buildings, bazaars and similar places where more than 1 workplace available, fire department report be obtained that proves precautions against fire having been taken

Status

Open*

Time given to resolve

60 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

* PDF generated at 11:00 (UTC) on 26 Sept 2025. View this finding on the Sedex platform for live updates and closure details.

← Code area 3

Code area 4 →

Findings: good examples

ZAF601114224

Good example

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.A Ensure a safe working environment. Put in place adequate controls to prevent accidents and injury (including long-term injury) to health arising out of, associated with, or occurring in the course of work.

Description

Tesis geçerli ve onaylı ISO 45001 Yönetim Sistemleri Sertifikasına sahiptir. The facility has a valid and approved ISO 45001 Management Systems Certificate.

Evidence


CERTIFICATE OF APPROVAL

[ISO 45001 Certificate - Kaptan Celik - 2025.jpg]

← Code area 3

Code area 4 →

3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, qualified safety officer
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	Yes The facility uses chemicals for the production processes.
Who organises accommodation for workers?	Workers independently arrange their own accommodation
Who organises worker transportation between accommodation and worksite?	Other third party contracted by the site
Who organises worker transportation while at work?	Site owned transport
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Yes According to the Field Tour, document review and management statement, all areas currently in use (Total 164598m2) appear to be registered as per local law. Seen. Checked.
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No

← Code area 3

Code area 4 →

Does the site have a structural engineer evaluation?	No

[← Code area 3] [Code area 4 →]

4. Child labour shall not be used

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1- Ensure Workplace Requirements are met = Robust Duing the Audit, it was confirmed with management & worker interviews and document checks that the management system for the "Child labour shall not be used" is well established and followed. 2- Appoint a manager with sufficient seniority = Robust Mr. Cenk Ciritci (Integrated Management System Deputy Manager) was appointed responsible person for the purpose. The special letter of management for the appointment seen. Checked. Detailed Job Descriptions exist. 3- Communicate and train = Robust The facility developed Policy and Procedures for the purpose. The facility communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. 4- Monitor the effectiveness = Robust The facility have sufficient monitoring processes and measures for the purpose. Regular internal audits are conducted. The policies and procedures are revised every year. The trainings are repeated every year. Records seen. Checked.

← Code area 3

Code area 5 →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

Systems and evidence examined to validate this code section	Current Systems: The facility have a special "Child Labour and Prevention Policy" in use for the purpose. According to the employee and management interview, the youngest employee was was 19 years old. He was born on 27/04/2006. He started to the job on 17/07/2024. No historical child labor was noted during the document review. Employees' personnel files include a recent photo and age documentation, which is in the form of a photocopied ID card. Confirmed with: ID Copies of employees Personnel file Document review Management and employee interviews

← Code area 3

Code area 5 →

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	7%
Enter the legal age of employment	15
Enter the age of the youngest worker identified	19
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	1.4%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	Not Applicable

← Code area 4

Code area 5 →

5. Legal wages are paid

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Not Addressed
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Fundamental Improvements Required
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Not Addressed
Monitor the effectiveness of procedures to meet policy and workplace requirements	Not Addressed

Management systems

Explanation for management systems grades	1- Ensure Workplace Requirements are met = Not Adressed NC - The facility did not share employee time records for May 2025 and November 2024. NC - During the audit, it was determined that the company had not made a difference analysis regarding the Living Wage. Duing the Audit, it was confirmed with management & worker interviews and document checks that the management system for the "Legal wages are paid" is established and but not followed. 2- Appoint a manager with sufficient seniority = Fundamental Improvements Required Mr. Cenk Ciritci (Integrated Management System Deputy Manager) was appointed responsible person for the purpose. The special letter of management for the appointment seen. Checked. Detailed Job Descriptions exist. But time records are not followed and kept. 3- Communicate and train = Not Adressed The facility developed Policy and Procedures for the purpose. The facility communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. The communication of policy need to be improved for the purpose of Living Wage. Also records should be kept safely. 4- Monitor the effectiveness = Not Adressed The facility have monitoring processes and measures for the purpose but time records of workers are missed/lost and needs some improvements for the purpose of Living Wage.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
5. Legal wages are paid	5.A Ensure that all workers (including non-em...	Local law Base code	NC ZAF601114217
	5.B Ensure that workers receive the insurance...		GE ZAF601114223

← Code area 4

Code area 5.A →

Systems and evidence examined to validate this code section	Current Systems; NC - During the Audit, information and records regarding employees' starting and ending hours for May 2025 and November 2024 could not be obtained. Therefore, the necessary and sufficient verification could not be performed. Based on the legal requirements, the actual lowest minimum wage in the facility is 24300 TL/net per month. Time keeping system is Card reading system. All workers are 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. All social insurance payments were paid to the relevant authorities in a timely manner. Each employee was given a pay slip and signed for their wages. All employees were paid within last working days of the month. Employees are aware of minimum wage. According to the documents which were provided and during the worker's interview, it was noted that Facility provides all kinds of leave. Maternity leave and earn leave benefits are provided to the employees as per law. Confirmed with: 1. Worker interview 2. Management interview 3. Local and national laws 4. Wages and benefits policy 5. Local legal minimum wage documents 6. Payroll records of last 12 months (3 months were sampled: November 2024 (Random month), January 2025 (Random Month) and June 2025 (Most Recent month paid). During the Audit, information and records regarding employees' starting and ending hours for May 2025 and November 2024 could not be obtained. Therefore, the necessary and sufficient verification could not be performed. 7. Leave records 8. Social group insurance and payment receipts from the local labor department 9. Labor contracts for all employees 10. Resignation records 11. Pay slips of all workers 12. Overtime records

* PDF generated at 11:00 (UTC) on 26 Sept 2025. View this finding on the Sedex platform for live updates and closure details.

Findings: good examples

ZAF601114223

Good example

Code area

5 Legal wages are paid

Workplace requirement

5.B Ensure that workers receive the insurances and benefits (including leave entitlements) they are legally or contractually entitled to.

Description

Tesis tüm çalışanlarına Tamamlayıcı Sağlık Sigorta Poliçesi, ücretsiz yemek ve ulaşım sağlamaktadır. The facility provides a Supplementary Health Insurance Policy, free meals and transportation to all employees.

← Code area 5

Code area 5.A →

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	The legal minimum wage
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Only digital payments
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	None

Worker renumeration

Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers?	Health care

Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Monthly	
Is actual wage data available on site for any of these options?	Daily Monthly	
Maximum legal working hours	**Max hours per day**	7.5
	Max hours per week	Non applicable
	Max hours per month	Non applicable

← Code area 5

Code area 5.A →

Actual required working hours	Required hours per day	7.5
	Required hours per week	Non applicable
	Required hours per month	Non applicable
Maximum legal overtime hours	Max hours per day	3.5
	Max hours per week	Non applicable
	Max hours per month	Non applicable
Actual overtime hours	Max hours per day	3.5
	Max hours per week	Non applicable
	Max hours per month	Non applicable
Minimum legal wage	Min per hour	Non applicable
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	22104.0
Actual minimum wage	Actual per hour	Non applicable
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	24300.0
Minimum legal overtime wage	Min per hour	147.36
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable

← Code area 5 Code area 5.A →

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
5.A. Living wages are paid	5.A.A Review workers' total pay including ben...	Base code	NC ZAF601114218
	5.A.B Put in place a wage improvement plan th...	Base code	NC ZAF601114219

Findings: non-compliances

ZAF601114218

Non-compliance

Code area

5.A Living wages are paid

Workplace requirement

5.A.A Review workers' total pay including benefits and compare it with a credible 'living wage' to calculate a 'living wage gap', and understand what proportion of the workforce has a gap.

Issue title

903 - CAR: A living wage gap analysis has not been completed

Description

Tetkik sırasında firmanın İnsanca Yaşam Ücreti ile ilgili bir fark analizi yaptığı görülmüştür ancak bu analiz Sedex tarafından tavsiye edilen uluslararası kabul görmüş metodlardan biri değildir. Yönetim çalışmaların müşterileri ile beraber başlatılacağını beyan etmiştir.
During the audit, it was discovered that the company had conducted a gap analysis regarding the Decent Living Wage, but this analysis was not one of the internationally accepted methods recommended by Sedex. Management stated that the study would be initiated in collaboration with its customers.

Corrective and preventative actions

İnsanca Yaşam Ücretine ulaşmak için işbirlikçi bir eylem yapılmalıdır. A collaborative action should be taken to reach the Living Wage.

Status

Open*

Time given to resolve

Verification method

Collaborative action required

Area of non-compliance/non-conformance

Base code

* PDF generated at 11:00 (UTC) on 26 Sept 2025. View this finding on the Sedex platform for live updates and closure details.

ZAF601114219

Non-compliance

Code area

5.A Living wages are paid

Status

Open*

Workplace requirement

5.A.B Put in place a wage improvement plan that aims to pay workers a living wage within a stated timeframe.

Issue title

905 - CAR: A wage improvement plan (with Living Wage as the goal) has not been completed

Description

Tetkik sırasında tesisin çalışanlara belirli bir zaman dilimi içerisinde yaşanabilir bir ücret ödemeyi amaçlayan bir ücret iyileştirme planı yapmadığı tespit edilmiştir. Yönetim çalışmaların müşterileri ile beraber başlatılacağını beyan etmiştir. During the audit, it was determined that the facility had not developed a wage improvement plan that would pay employees a livable wage within a certain time frame. Management stated that the work would be initiated in conjunction with its customers.

Corrective and preventative actions

Çalışanlara belirli bir zaman dilimi içerisinde yaşanabilir bir ücret ödemeyi amaçlayan bir ücret iyileştirme planı yapılmalıdır. A wage recovery plan should be developed that aims to pay employees a living wage within a specific time frame.

Time given to resolve

Verification method

Collaborative action required

Area of non-compliance/non-conformance

Base code

* PDF generated at 11:00 (UTC) on 26 Sept 2025. View this finding on the Sedex platform for live updates and closure details.

← Code area 5.A

Code area 6 →

6. Working hours are not excessive

Summary of findings

Findings: non-compliances

ZAF601114220

Non-compliance

Due 2025-11-25

Code area

6 Working hours are not excessive

Workplace requirement

6.A Ensure working hours (including overtime) are accurately recorded, and do not exceed legal limits or limits in collective bargaining agreements, whichever gives more protection for workers.

Issue title

463 - Unable to verify working hours due to missing/ incomplete/ inconsistent records

Description

Tesis Mayıs 2025 ve Kasım 2024 aylarına ait çalışanların zaman kayıtlarını paylaşmamıştır. Tesis bilgi güvenliği ve sistem üzerindeki yüklerin azaltılması için söz konusu kayıtların 3 aydan sonra silindiğini, tekrar geri getirilmesi için çalışıldığını beyan etmiştir. Tetkikçi söz konusu verilere ulaşamadığı için zaman kayıtlarını ve ilgili diğer alanlardaki bilgileri tam olarak doğrulayamamıştır. The facility did not share employee time records for May 2025 and November 2024. The facility stated that these records were deleted after three months to ensure information security and reduce system load, and that efforts were underway to restore them. Because the auditor was unable to access the data in question, they were unable to fully verify the time records and other relevant information.

Corrective and preventative actions

Tetkikçi tarafından talep edilen tüm zaman kayıtları sağlanmalıdır. All time records requested by the auditor must be provided.

Local law reference

Regulation Regarding Working Hours Related to Labour Law, Clause 9 - Employer must document working hours of employees with appropriate tools. Regulation Regarding Overtime and Extra Work Related to Labour Law, Clause 10 - Employer must arrange a document that indicates the extra work and overtime hours and keep a signed copy of this document in employees' personnel files. The overtime and extra work allowances are paid with regular wage together in accordance with Turkish Labour Law, Clauses 32 and 34. The payments are clearly shown on payroll documentation and on pay slips that are given to employees to Labour Law, Clause 37.

Status

Open*

Time given to resolve

60 days

Verification method

Follow up audit

Area of non-compliance/non-conformance

Local law

Base code

* PDF generated at 11:00 (UTC) on 26 Sept 2025. View this finding on the Sedex platform for live updates and closure details.

← Code area 6

Code area 7 →

6. Working hours are not excessive

← Code area 6

Code area 7 →

7. No discrimination is practiced

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1- Ensure Workplace Requirements are met = Robust Duing the Audit, it was confirmed with management & worker interviews and document checks that the management system for the "No discrimination is practiced" is well established and followed. 2- Appoint a manager with sufficient seniority = Robust Mr. Cenk Ciritci (Integrated Management System Deputy Manager) was appointed responsible person for the purpose. The special letter of management for the appointment seen. Checked. Detailed Job Descriptions exist. 3- Communicate and train = Robust The facility developed Policy and Procedures for the purpose. The facility communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. 4- Monitor the effectiveness = Robust The facility have sufficient monitoring processes and measures for the purpose. Regular internal audits are conducted. The policies and procedures are revised every year. The trainings are repeated every year. Records seen. Checked.

← Code area 6

Code area 8 →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

Systems and evidence examined to validate this code section	Current Systems; There was no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation. The Facility does not require or allow health checks for workers to take place during the recruitment process or during employment where the results are used to unfairly avoid hiring or retaining workers with certain health issues or medical conditions. This includes pregnancy (unless explicitly required by law) or HIV/AIDS. The Facility ensures that grievance mechanisms are accessible to all workers, regardless of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership and political affiliation. Confirmed with: Employee, management interviews and document review in accordance with SMETA Best Practice Guidance and Local Law.

← Code area 6

Code area 8 →

7. No discrimination is practiced

Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)?	6%
Representation of women in managerial roles (ratio of women workers to women managers)	44%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	88%
Three most common nationalities in managerial and supervisory roles	Turkish

← Code area 7

Code area 8 →

8. Regular employment is provided

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1- Ensure Workplace Requirements are met = Robust Duing the Audit, it was confirmed with management & worker interviews and document checks that the management system for the "Regular employment is provided" is well established and followed. 2- Appoint a manager with sufficient seniority = Robust Mr. Cenk Ciritci (Integrated Management System Deputy Manager) was appointed responsible person for the purpose. The special letter of management for the appointment seen. Checked. Detailed Job Descriptions exist. 3- Communicate and train = Robust The facility developed Policy and Procedures for the purpose. The facility communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. 4- Monitor the effectiveness = Robust The facility have sufficient monitoring processes and measures for the purpose. Regular internal audits are conducted. The policies and procedures are revised every year. The trainings are repeated every year. Records seen. Checked.

← Code area 7

Code area 8.A →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

Systems and evidence examined to validate this code section	Current Systems; It has been observed that all employees have insurance records. Obligations to employees under labor or social security laws and regulations arising from the regular employment relationship shall not be avoided through. The facility has a full understanding of the entire recruitment process and assesses and against legal and ethical requirements. There are no contract or subcontracted workers in the Facility. However, in the recruitment procedure established by the Facility, a commitment is made to comply with local legal requirements. There was no migrant workers in the facility. Recruitment procedures are carried out by the Facility. The Facility did'nt use the employment agency. Facility pay employment health examination fees during recruitment. Employment contracts comply with legal requirements. Confirmed with: Document review (42 sampled employees personnel files) and worker declarations.

← Code area 7

Code area 8.A →

8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed	100.0%
Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment	0.0%
Percentage of workers employed as apprentices, trainees or interns	1.44%

← Code area 8

Code area 8.A →

8.A. Sub-contracting and homeworkers are used responsibly

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1- Ensure Workplace Requirements are met = Robust Duing the Audit, it was confirmed with management & worker interviews and document checks that the management system for the "Sub-contracting and homeworkers are used responsibly" is well established and followed. 2- Appoint a manager with sufficient seniority = Robust Mr. Cenk Ciritci (Integrated Management System Deputy Manager) was appointed responsible person for the purpose. The special letter of management for the appointment seen. Checked. Detailed Job Descriptions exist. 3- Communicate and train = Robust The facility developed Policy and Procedures for the purpose. The facility communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. 4- Monitor the effectiveness = Robust The facility have sufficient monitoring processes and measures for the purpose. Regular internal audits are conducted. The policies and procedures are revised every year. The trainings are repeated every year. Records seen. Checked.

← Code area 8

Code area 9 →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section

Current Systems;
There is no subcontracting companies within the facility. There is no homeworker or internal subcontracting in the Facility.
The facility has suppliers. Regular checks were done by the facility.
Confirmed with:
Management and employee interviews and document checks.

← Code area 8

Code area 9 →

8.A. Sub-contracting and homeworkers are used responsibly

Data points

Are homeworkers employed directly or engaged through an agent?	Not applicable
Gender disaggregated data available	

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homeworker?	
Are full records of homeworkers available at the site?	
Does the supplier buy products or services from suppliers that use homeworkers?	No The facility does not buy the supplier buy products or services from suppliers that use homeworkers. Confirmed with supplier check forms.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity?	No There are no any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity.

← Code area 8.A

Code area 9 →

Are any sub-contractors used?	No

9. No harsh or inhumane treatment is allowed

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1- Ensure Workplace Requirements are met = Robust Duing the Audit, it was confirmed with management & worker interviews and document checks that the management system for the "No harsh or inhumane treatment is allowed" is well established and followed. 2- Appoint a manager with sufficient seniority = Robust Mr. Cenk Ciritci (Integrated Management System Deputy Manager) was appointed responsible person for the purpose. The special letter of management for the appointment seen. Checked. Detailed Job Descriptions exist. 3- Communicate and train = Robust The facility developed Policy and Procedures for the purpose. The facility communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. 4- Monitor the effectiveness = Robust The facility have sufficient monitoring processes and measures for the purpose. Regular internal audits are conducted. The policies and procedures are revised every year. The trainings are repeated every year. Records seen. Checked.

← Code area 8.A

Code area 10.A →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

Systems and evidence examined to validate this code section

Current Systems;
There are Working Principles - Social Policy and Suggestion and Complaint Procedure created at the facility. In this policy, it has been declared that no action will be taken regarding physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation.
Suggestion boxes are available at the Facility. These boxes are positioned at points that the camera cannot see.
In addition, employees can report complaints and suggestions to their supervisors through the open-door policy.
Confirmed with:
Control of Social Compliance Policy and Suggestion and Complaint Procedure
Site Tour,
Management Interview,
Worker Interviews

← Code area 8.A

Code area 10.A →

9. No harsh or inhumane treatment is allowed

Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?	Yes, there is a formal grievance process The grievance process is available to all workers
What type of grievance mechanism(s) are available?	There are Social Compliance Policy (Document Number: EYS-SSP-010, 19/07/2024, Rev: 01) and Stakeholder Suggestion and Coplaint Procedure (Doc. No: EYS-PR-110, 20/10/2023, Rev: 02) created at the facility. Complaint and Suggestion digital stations are available at the Facility. These stations are positioned at points that the camera cannot see. In addition, employees can report complaints and suggestions to their supervisors through the open-door policy.
Number of grievances raised in the last 12 months	224
Number of grievances resolved in the last 12 months	224

← Code area 9

Code area 10.A →

10.A. Environment 2-Pillar

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1- Ensure Workplace Requirements are met = Robust Duing the Audit, it was confirmed with management & worker interviews and document checks that the management system for the "Environment 2-Pillar" is well established and followed. 2- Appoint a manager with sufficient seniority = Robust Mr. Cenk Ciritci (Integrated Management System Deputy Manager) was appointed responsible person for the purpose. The special letter of management for the appointment seen. Checked. Detailed Job Descriptions exist. 3- Communicate and train = Robust The facility developed Policy and Procedures for the purpose. The facility communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. 4- Monitor the effectiveness = Robust The facility have sufficient monitoring processes and measures for the purpose. Regular internal audits are conducted. The policies and procedures are revised every year. The trainings are repeated every year. Records seen. Checked.

← Code area 9 Code area 10.B →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
10.A. Environment 2-Pillar	10.A.A Remain aware of the local, regional an...		GE ZAF601114221

Systems and evidence examined to validate this code section	Current Systems; With the document review carried out at the facility, it was observed that they have all legal documents. The facility has a special Temporaray Operation Certificate for Environmental approved by the official bodies. (23/09/2024, No: 223657050.1.1, Expiry: 20/09/2025). Environmental Policy has been created at the factory to be communicated to suppliers and relevant parties. The facility has Environmental Policy covers commitments related to biodiversity and our suppliers are aware of the environmental impacts of the factory. It has been verified that the factory is not subject to any fines or penalties. Verified with: Document Control (Environmental Procedure, Legal Documents, Environmental training records, etc.) Employee Interviews, Management Interviews.

← Code area 9
Code area 10.B →

SMETA powered by Sedex

Findings: good examples

ZAF601114221

Good example

Code area

10.A Environment 2-Pillar

Workplace requirement

10.A.A Remain aware of the local, regional and national environmental laws relating to the site, and have clear processes around how these laws are updated and communicated.

Description

Tesis geçerli ve onaylı ISO 14001 ve ISO 50001 Sertifikaları sahibidir. The facility holds valid and approved ISO 14001 and ISO 50001 Certificates.

Evidence

[ISO 50001 Certificate - Kaptan Celik - 2025.jpg]

[ISO 14001 Certificate - Kaptan Demir Celik - 2025.jpg]

← Code area 10.A

Code area 10.B →

10.A. Environment 2-Pillar

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?	No
Does the site have any valid environmental or energy management certificates?	The facility has Temporary Operational Permit for the Environment for the factories approved by the official bodies. 20/09/2024, No: 223657050.1.1, Expiry: 20/09/2025. The facility also have ISO 14001 and ISO 50001 Management System Certificates.
Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?	No
Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?	Yes The Facility is an active member of World Steel Climate Action Data Provider group and World Steel Sustainabilty Reperting Expert Group. The Faciliy is also reporting for ISO 14064/GHG Protocol, verified and certified. Last report seen. 25/08/2025. The Facility also have Climate Action and TCFD Report of 2024. 11/08/2025.

← Code area 10.A

Code area 10.B →

10.B. Environment 4-Pillar

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
10.B. Environment 4-Pillar	10.B.E Identify and monitor potential negativ...		GE ZAF601114222

Systems and evidence examined to validate this code section

Current Systems;
With the document review carried out at the facility, it was observed that they have all legal documents.
The facility has a special Temporaray Operation Certificate for Environmental approved by the official bodies. (23/09/2024, No: 223657050.1.1, Expiry: 20/09/2025).
Environmental Policy has been created at the factory to be communicated to suppliers and relevant parties. The facility has Environmental Policy covers commitments related to biodiversity and our suppliers are aware of the environmental impacts of the factory.
It has been verified that the factory is not subject to any fines or penalties.
Verified with:
Document Control (Environmental Procedure, Legal Documents, Environmental training records, etc.)
Employee Interviews,
Management Interviews.

← Code area 10.A
Code area 10.C →

Findings: good examples

ZAF601114222

Good example

Code area

10.B Environment 4-Pillar

Workplace requirement

10.B.E Identify and monitor potential negative environment impacts of operations and supply chain and have in place systems that prevent, mitigate or remedy the impacts of their own operations.

Description

Tesis geçerli ve onaylı BS8902, BES6001, ISO 14046, ISO 14064 ve GHG Sertikilarına sahiptir. The Facility have valid and approved Certificates of BS8902, BES6001, ISO 14046, ISO 14064 and GHG.

Evidence

ISO 14046 Certificate - Kaptan Demir Celik - 2025.jpg

GHG - Kaptan Celik - 2025.jpg

BS8902- Kaptan Celik - 2025.jpg

BES6001- Kaptan Celik - 2025.jpg

← Code area 10.B

Code area 10.C →

10.B. Environment 4-Pillar

Data points

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes
What additional specific environmental policies does the site capture?	Switching to renewable energy sources Responsible use and management of water Zero-waste and recycling protocols Prioritising local suppliers Biodiversity and eco system impact management Circular economy and resource efficiency Sustainable material sourcing
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes The Facility have a special system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues. Facility has a specialn Certificate BES 6001 Resposible Sourcing Certificate for the purpose. (26/11/2021, Valid: 26/11/2026, No: 1679)
Does the site have reduction targets in place to manage climate related risks?	Yes, to reduce scope 1 greenhouse gases (GHGs) Yes, to reduce scope 2 greenhouse gases (GHGs) Yes, to reduce scope 3 greenhouse gases (GHGs) Yes, a net-zero target Yes, other climate-related target
Are any of these science-based targets?	No, but we anticipate setting one in the next two years

← Code area 10.B

Code area 10.C →

Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?	Yes

Water Consumption Targets
Total water consumption will be reduced from the 2023 level of 1.02 m^3/ton of steel to below 0.98 m^3/ton of steel.
Rolling mill water consumption will be reduced from the 2023 level of 0.45 m^3/ton of product to a lower level.
Wire rod water consumption will be reduced from the 2023 level of 0.31 m^3/ton of steel.
Steelmaking water consumption will be reduced from the 2023 level of 0.26 m^3/ton of steel.
Rainwater utilization will be increased, and the rainwater collection channels in the old rolling mill area will be completed.
Water Footprint Targets
Blue water footprint will be reduced from the 2023 level of 1,145,474 m^3/year.
Green water footprint will be maintained at the 2023 level of 11,243 m^3/year.
Gray water footprint will be reduced from the 2023 level of 20,932 m^3/year.
Air Emissions Targets
[Scope 1] NOx, SOx, and dust emissions will be reduced.
[Scope 1] Dust emissions will be lowered through improvements in filtration systems.
[Scope 2] Electricity-related air emissions will be reduced.
[Scope 1 + 3] Vehicle exhaust emissions will be reduced.
[Scope 3] Transportation-related air emissions will be reduced.
[Scope 1] Emissions from industrial gas production will be kept under control.
Climate and Emissions Reduction Targets
[Scope 1 + 2] The company aims to be ranked among the top five steel producers worldwide in terms of emissions performance by 2030, according to evaluations by the World Steel Association.
[Scope 1 + 2] The company seeks to be among the countries demonstrating at least 15% annual improvement in emissions performance, and to sustain this achievement over time.
[Scope 1 + 2] On an annual basis, emission intensity in steel production (tCO_2/ton steel) will be reduced compared to the previous year.
[Scope 1 + 2 + 3] The Global Warming Potential (GWP) value, measured in CO_2 per ton of crude steel in the EPD reports, will be reduced to below 740 kg CO_2/ton.
[Scope 1] Emissions from stationary combustion and process sources monitored under the MRV system will be reduced to 0.12 tCO_2/ton steel, based on 2023 levels.
[Scope 2] Indirect emissions from electricity consumption will be reduced by at least 5% each year compared to the previous year.
[Scope 3] Logistics-related emissions from the transportation of scrap and ferroalloys will be reduced to 0.11 tCO_2/ton steel, compared to 2023 levels.
Energy and Scope 2 Targets
Total energy intensity will be reduced below the 2024 level of 2.378 GJ/ton steel.
Electricity intensity will be reduced below the 2024 level of 726.368 GJ/ton steel.

← Code area 10.B

Code area 10.C →

Energy performance coefficient will be lowered below the 2024 level of 3.36.
Total energy consumption in the steelmaking plant (including electricity, natural gas, coal, and fuel oil) will be reduced below 2024 levels.
Rolling mill energy consumption will be reduced below 1.025 GJ/ton of product, using 2024 as the reference.
Total energy intensity across all facilities will be reduced below 2024 levels.
Scope 2 (electricity-related) emissions will be reduced below the 2024 level of 255,212.4 tCO_2e.
Investments in renewable energy projects will be increased (installed capacity: 72 MWe in 2024, compared to 35,604 kWp in 2023).
Wind energy projects will continue to be explored, and project development activities will be advanced.
Waste Management Targets
The amount of by-products per ton of steel will be reduced by 1.2% compared to 2024.
The ratio of recyclable waste within the total waste amount will be increased compared to 2024.
The amount of incinerable waste per ton of steel will be reduced below 2024 levels.
The amount of non-recyclable waste per ton of steel (LF slag + domestic waste) will be reduced below 2024 levels.
Biodiversity and Nature Commitments
Calculation of green area size, and ensuring the protection and expansion of existing green spaces around the facility.
Supporting the living conditions of stray animals, with continued activities under the "Yaşat Project."
Publication of the TNFD report, ensuring the protection of local flora and fauna.
Tree donation: 1,500 saplings were donated to the TEMA Foundation in 2024.
Monitoring the impacts of land use, emissions, and waste on biodiversity.
Kaptan Demir Çelik's operations are not located in forest areas and therefore do not directly contribute to deforestation. The company respects the natural areas surrounding its facilities and aims to protect and expand green spaces. In this context, 1,500 saplings have been planted, and the total green area has begun to be calculated and monitored. In addition, the "Yaşat Project" is being implemented to support the living conditions of stray animals, reflecting a broader social responsibility towards the protection of natural life. The company also plans to adopt TNFD (Taskforce on Nature-related Financial Disclosures) reporting to monitor and manage its impacts on nature in a more transparent manner.

← Code area 10.B

Code area 10.C →

Has the site checked that any sub-contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	Not Applicable

Usage/discharge analysis

	Last full calendar year (2024)	Previous full calendar year (2023)
Total electricity consumption from non-renewable sources (kWh)	532,462,577	456,497,751
Total electricity consumption from renewable sources (kWh)	225,551,142	180,270,962
Sources of renewable energy used	Utility provider	Utility provider
Types of renewable energy used	Solar Wind Hydroelectric Geothermal	Solar Wind Hydroelectric Geothermal
Total natural gas consumption (kWh)	32,866,019	25,913,390
Usage of other purchased fuels	Dizel and Coal: 365,000 GJ	Dizel and Coal: 363,764 GJ
Has the site completed any carbon footprint analysis?	Yes **Scope 1:** 148610 (tCO_2e) **Scope 2:** 235799 (tCO_2e) **Scope 3:** 1077656 (tCO_2e)	Yes **Scope 1:** 118781 (tCO_2e) **Scope 2:** 201772 (tCO_2e) **Scope 3:** 950959 (tCO_2e)

← Code area 10.B

Code area 10.C →

Water sources	Ground Water	Ground Water
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	1,145,603	958,564
Water discharged	Local Water Authority	Local Water Authority
Water volume discharged (m3)	63,266	62,906
Water volume recycled (m3)	50,568	20,864
Total waste produced (mt)	162,913	186,175
Total hazardous waste produced (mt)	11,010	15,793
Waste to recycling (mt)	19,530	28,716
Waste to landfill (mt)	0.9	0.9
Waste to other (mt)	0	0
Total product produced (mt)	902,177	811,227

← Code area 10.B

Code area 10.C →

10.C. Business ethics

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1- Ensure Workplace Requirements are met = Robust Duing the Audit, it was confirmed with management & worker interviews and document checks that the management system for the "Business ethics" is well established and followed. 2- Appoint a manager with sufficient seniority = Robust Mr. Cenk Ciritci (Integrated Management System Deputy Manager)) was appointed responsible person for the purpose. The special letter of management for the appointment seen. Checked. Detailed Job Descriptions exist. 3- Communicate and train = Robust The facility developed Policy and Procedures for the purpose. The facility communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. 4- Monitor the effectiveness = Robust The facility have sufficient monitoring processes and measures for the purpose. Regular internal audits are conducted. The policies and procedures are revised every year. The trainings are repeated every year. Records seen. Checked.

← Code area 10.B

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

Systems and evidence examined to validate this code section

Current Systems:
Mr. Cenk Ciritci (Integrated Management System Deputy Manager) was the designated person responsible for implementing standards concerning Business Ethics, and that site practices were conducted without any corruption and/or bribery.
The company established a business ethics policy to communicate both externally and internally and provide training on business ethics.
There is an internal grievance process on site.
Confirmed with:
The company business ethics policy including Bribery Corruption
Training records
Worker handbook
Reports from Anonymous email account
Management interview
Worker intervies

← Code area 10.B

10.C. Business ethics

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with business ethics legislation, regulation, consent or permits (within the last three years)?	No
Provide any certified anti-bribery management systems for the site	N/A

← Code area 10.C

Attachments

Photo Frame-SEDEX - Kaptan Demir Çelik - Tekirdağ - 2025.pdf

CAPR_ZAA600157311 - signed.pdf