

Questions for garment brands re Syrian refugees in Turkey

October 2016

Company: ASOS

1. Does your company have a policy specifically prohibiting discrimination & exploitative practices against Syrian refugees? How is this policy communicated to vendors in Turkey?

ASOS takes the situation of Syrian refugees in Turkey very seriously and has been engaged with the ETI and its brand members on this issue since 2014.

ASOS has committed to taking a common approach towards our Turkish suppliers with other ETI brand members, emphasising a zero tolerance stance on exploitation of and discrimination against Syrian refugees working within the sector. This stance is in line with ETI's internationally recognised Base Code of labour practice, and in accordance with the UN Guiding Principles on Human Rights. Our Migrant Labour Policy would additionally cover this as follows: 'Provide migrant workers with the same opportunities and employment conditions as domestic workers, including the same rates of pay for comparable job roles. Be proactive in creating equal opportunities.'

We commit to supporting Turkish suppliers to improve conditions and provide appropriate remediation where needed, placing the interest of affected workers first and foremost. Our local manager has also attended stakeholder groups such as the FLA/ETI roundtable in 2015. We aim to attend all such multi-stakeholder groups, collaborating

with other brands and stakeholders to share information and improve Syrian workers' rights.

We held an all supplier and factory conference in March 2016 where we shared our position on Syrian labour against our code of conduct. Confirming that no Syrian worker should be discriminated against, equal pay and opportunities should be implemented and no worker should be dismissed should we find them in our supply chain.

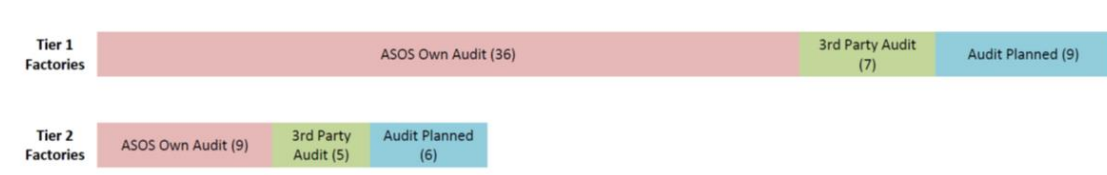
2. How many first tier Turkish vendors does your company have?

There are 52 1st tier factories in our Turkey supply chain.

3. How many have been audited since in the last year? What percentage of audits have been unannounced?

ASOS assess the manufacturing sites in our supply chain on their ability to meet ASOS's Ethical Standards through the review of third party ethical audits to a standard we accept, as well as ethical audits by our own local team, paid for by ASOS.

The audit status for our Turkish suppliers between July 2015 and 2016 is:



Of the 45 ASOS Own Audits, 47% were semi-announced or unannounced. The percentage of unannounced visits will increase, as since March 2016 all audits in Turkey carried out by our team are semi-announced or unannounced.

4. Does your company carry out audits beyond the first tier? If so what percentage of second & third tier Turkish suppliers have been audited in the last year and what percentage of these audits have been unannounced?

There are 20 2nd tier factories in our Turkey supply chain. The audit status is shown in Q3.

5. Do the audit & monitoring teams have Arabic-speakers who have received special training tailored to the situation of Syrian refugees, and do they speak with the workers confidentially?

We have an Arabic translator who is on call should we find Syrian workers in our factories and is present at any visits where Syrian workers are known to be present.

Our team are experienced at interview processes and interviews are carried out confidentially. The translator is always given a brief prior to interviews being held.

When interviewing Syrian workers we focus on their employment situation to keep questions factual and to establish any immediate issues relating to their employment at the site.

6. How does your company address the possibility of undeclared subcontracting in its supply chain?

ASOS prohibits undeclared subcontracting in its supply chain. This is confirmed in our Ethical Standards as well as in our terms and conditions of business. The risks of subcontracting are reviewed using the capacities of each department within a factory as a basis from which to fully understand any imbalances and potential need for subcontractors.

We further confirmed our position on subcontracting to our Turkish supply base during our March 2016 supplier conference held in Istanbul. This was not to prohibit subcontracting but to ensure suppliers understand that all outsourced processes and subcontractors must be declared.

Subcontracting of parts of the production process is a standard procedure for many suppliers/factories in Turkey. Due to differing customer views regarding subcontracting, factory management are often concerned about being transparent about any subcontractors, for fear of the consequences to their business. Our team works hard to build mutual trust so factory management are comfortable to talk openly about their working practises and problems.

ASOS has planned to begin a formal a mapping process in September 2016 to further map our supply chain in Turkey.

7. Has your company identified supplier factories employing Syrian refugees in the last year? If the answer is yes please state how many factories, if possible

We have discovered Syrian workers in 4 factories.

8. Has your company identified supplier factories employing Syrian child refugees in the last year? If the answer is yes please state how many factories, if possible

No

9. When Syrian refugees are identified at a supply factory, what process does your company expect the supplier to follow? In particular please state whether they remain in employment.

The primary objective is that employment must continue.

The details of the employment conditions are gathered and these are shared with the supplier and factory management in terms of their adherence to the ASOS code and where improvement is necessary.

The main immediate changes would be:

Ensure minimum wage is paid if not already

Ensure working hours, health and safety standards, food and transport benefits and overall treatment is the same as for Turkish workers

Support in applying for work permits

We keep a register of all Syrian workers found across our factory base, ensuring we are able to track these vulnerable workers and prevent suppliers from ending their employment.

10. Does your company have a remediation plan that addresses instances of discrimination/abuse against Syrian refugees in its supply chain? If yes please provide details of the plan, how it is communicated to refugees, and examples of outcomes if available.

At this early stage of finding Syrian workers, our main objective is to focus on the workers and management to understand what improvements are needed to address issues against our code. Additionally we have access to local NGOs who can give specific support depending on the needs of the individual.

More broadly we are looking at providing local language courses for all Syrian workers as well as other family support services.

11. Does your company work with any local NGOs or trade unions to provide remediation services to refugees?

We have informal connections with local NGOs. These relationships are under discussion and as yet are not formalised. We will provide this information once relationships are formalised.

12. As Syrian refugees cannot receive social security benefits at this time, is your company taking steps to ameliorate the impact of this?

Our main goal is to achieve a minimum payment of 1300.99TL per month which includes the AGI family tax rebate minimum level. The minimum wage without this is 1177TL.

We also encourage factories to help Syrian workers register under the temporary protection scheme (if they are not already) as this allows them free access to medical facilities. All factories are responsible for managing any work related health issues. We are in regular contact with workers and management at the factories where we have found Syrian labour and would be able to ensure this is being handled effectively.

13. Has your company undertaken any specific training with its first tier suppliers on this issue?

We held a supplier conference in March 2016 where we discussed in detail our approach to Syrian labour and our expectations for suppliers and factories reaching 1st and 2nd tier.

14. What steps has your company taken to ensure that your policies/approach are being implemented by suppliers beyond the first tier?

We map our factory base beyond tier 1. We have advised all suppliers and factories regarding our policy and view of subcontracting. We have implemented 100% semi-announced or unannounced audits. Any site where Syrian labour is present receives more regular unannounced visits to ensure we keep in close contact with both workers and management.

We will be linking with a partner to carry out in depth mapping in our Turkish supply chain from September 2016.

15. Does your company engage with local civil society groups and trade unions on this issue, for instance, in negotiating a policy position & carrying out risk mapping?

ASOS is a participant in a long term project with the ETI, which will include local civil society, trade unions and brands:

‘In the past year, there have been efforts by multi-stakeholder initiatives, brands and civil society groups to foster dialogue on the topic of working conditions for Syrian refugees and to lobby the government to bring in work permit legislation; this productive collaboration has highlighted the need for an ongoing sustainable platform to address broader worker rights issues across Turkey. ETI has played a key role in these efforts, thus helping to lay the foundations for a Business and Human Rights platform. This project will provide the support to catalyse these fledgling developments and establish a long-term platform in the country. In line with the UNGPs the sector will benefit from a platform to:

allow businesses, employers, suppliers and trade unions to work together to build awareness of and capacity to promote Business and Human Rights;

engage local stakeholders in workplace social dialogue to promote improved employment conditions, protect workers' rights and resolve conflicts;

To develop better policies and approaches to grievance redressal.' ETI project framework

16. Does your company work with trade unions on identifying health & safety risks for Syrian refugees (where communication may be difficult)?

Yes, see response to Question 15. Additionally we work with our Arabic translator and factory management to ensure that Syrian workers are clear on H&S procedures in the factories they work in. H&S is a priority for ASOS throughout its programme for all workers regardless of nationality.

17. Does your company work with trade unions or other partners to offer training and education programmes for refugees?

Yes, see response to Questions 15.

18. Has your company engaged the Turkish Government regarding the legal framework for Syrian refugees?

Yes. ASOS took part in the ETI and FLA collaboration to lobby the Turkish government to provide work permits for Syrian refugees. This work will now further develop as per the planned work with ETI and brands noted in question 15.