

Questions for garment brands re Syrian refugees in Turkey

October 2016

Company: Debenhams

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

Our Code of Conduct applies to all people regardless of nationality and circumstances. Discrimination is prohibited in any form. Everyone must be treated equally, work the same hours and be paid as per the relevant local or national law.

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

We have currently 32 suppliers with 36 production sites in Turkey which are first tier suppliers.

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

We follow an annual audit process for all our global factories as part of our Social Compliance programme. All our audits are conducted by a nominated 3rd party audit company for all factories, which are semi-announced and 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?

We carry out third party audits across all our 2nd tier subcontracting factories, so 100 % of our Turkish subcontracting units are audited. Due diligence checks are carried out in our 3rd tier sites through unannounced visits by our UK Head Office Compliance team supported by our nominated audit company, so we have the local knowledge of geography and the language of a local national audit representative with us.

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?

Yes, our local third party global audit partner has local Arabic speakers who are trained to identify Syrian workers.

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

We closely work with our Turkish suppliers on transparency regarding subcontracting and outsourcing units. Almost two years ago we advised our Turkish suppliers that they would not be in a negative position for declaring all sub-con units to us, emphasising the essential need for open transparency. We also conduct unannounced spot checks on production sites through our third party auditors to ensure our goods are being made in the relevant approved factory unit.

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

No, we have not identified any Syrian refugees in our factories during the last year or to date.

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, we have not identified any Syrian child refugees in our factories during the last year or to date.

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.

N/A

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.

[Not answered]

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

[Not answered]

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

[Not answered]

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

[Not answered]

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

[Not answered]

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?

[Not answered]

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

[Not answered]

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

[Not answered]

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

We have endorsed communication and work being done by the ETI to engage the Turkish Government.