

Questions for garment brands re Syrian refugees in Turkey

October 2016

Company: New Look

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

New Look is committed to ensuring, particularly in light of recent political developments, that all and any refugees employed in our supply chain are employed on a formal basis and subject to the correct legal procedures and fair working conditions. We have issued a refugee policy for our suppliers to ensure the following:

- Refugee workers should be working under voluntary working conditions.
- Any worker must not be expelled under Syrian refugee status and should be registered to obtain a valid work permit in accordance with local legislation.
- Whilst the application is being processed, the refugee should be allowed to carry on working as normal and afforded equal treatment as other employees.
- The refugee will be provided with at least the Gross National Minimum Wage, overtime premium, weekly rest day and a written confirmation of conditions of employment.

We are a committed member of the Ethical Trading Initiative and as such have adopted its principles as a code of practice (see page 52 of our [CSR report](#)).

See [policy attached](#).

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

We currently have 4 active suppliers in Turkey.

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

Audits have been performed to 100% of our supply base. All suppliers are required to provide 3rd party audits for the factories that manufacture New Look products. 5% of these audits have been performed on unannounced basis. We plan to conduct 100% unannounced audits of our tier 1 factories by the end of the current financial year.

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?

Knowing our supply chain is important for us. In Turkey we've mapped units beyond tier 1 and are in the process of starting our audit programme for these facilities.

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?

Our partners on the ground speak Turkish and we will always use translators or local NGOs when there is a need for translation. As part of our monitoring programme, if we encounter refugees who don't speak the local language we arrange for translators to effectively communicate with them.

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

All suppliers need to declare all the units that are used to manufacture New Look products in a timely manner. We have a due diligence process in place in addition to our subcontracting policy to address the possibility of undeclared subcontracting, including the tracking of production, spot checks and unannounced visits. Subcontracting cases are dealt with on a case-by-case basis and may lead to termination of business.

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

During one of the regular audits of our supply chain, we discovered an adult Syrian refugee without a work permit employed in one of the factories producing garments for us. We have a robust policy in place when dealing with situations of this nature and we are following the steps highlighted in our Refugee Policy and Remediation Plan (see below). We are currently helping this individual apply for the correct work permits.

1. Help the refugee register and obtain a valid work permit in accordance with local legislation and provide all required documentation.
2. A proposed remediation plan based on the situation of each refugee must be submitted to New Look within 15 working days.
3. The cost of the work permit application process should be borne by the New Look's related supplier/producer.

4. Whilst the work permit is being processed the refugee should be allowed to work in the factory.
5. Refugee workers should have access to an employee's union, they should be able to choose a representative, be paid the gross minimum wage, overtime based on actual hours worked as per local law until refugee obtains the work permit.
6. All attendance records, time and payment records should be maintained during the work permit application procedure.
7. A thorough investigation shall be conducted to understand and analyse the situation of each refugee worker found in factory without work permit.
8. Once the refugee obtains the work permit, New Look's related supplier/producer should carry on with employment relationship with the refugee worker.
9. Reports on remediation progress shall be shared with New Look on a quarterly basis.
10. If the refugee refuses to apply for work permit, the NGO should be engaged to understand the reasons of non-application.
11. If any refugee's work application is refused/denied, or the refugee refuses to apply for the work permit; then the employment relation should be terminated responsibly and all outstanding dues should be paid to the refugee. The severance pay and notice period compensation to be paid to the refugee cannot be less than what is regulated by local law for a worker.

12. Following the refusal or denial of a work permit application and employment is interrupted as a result, opportunities for re-employment in the future should be kept under review. If the refugee subsequently obtains a valid work permit, a vacancy exists and the number of refugees in the factory adheres to local law, the vacancy should be offered to the refugee and if the refugee accepts, the refugee's employment should be reinstated and their continuity of employment preserved.
13. Regular visits shall be organized to factories in order to verify the voluntary working conditions.
14. Factory should work with local NGO agreed / approved by New Look. The criterion for NGO selection will be expertise and experience of dealing with refugees

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 haven't found Syrian child refugees being employed in our supply chain.

New Look is strongly opposed to child labour and our Code of Conduct stipulates that all workers in the factories producing our products must be over the local minimum working age. We believe that children found working should be getting a good education in school therefore we commit to removing them from work and ensure they are supported through school so that they can make a better life for both themselves and their families.

This is done in two ways:

- At a policy level, we have a policy and remediation plan which follow Impactt's Operational Procedures on Child Labour, setting our commitment to getting children back to school

- At an operational level, if children are found in our supply chain we work with local NGOs and other partners to ensure the children are able to return to school whilst also being paid the salary they would have received at the factory.

These principles apply to all children in all work situations regardless of their employment status or length of service and include a staged remediation plan ranging from immediate actions, remediation programme design and ongoing support and monitoring.

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.

New Look requires all its suppliers to comply with the obligations below. The Supplier must also procure that each of its subcontractors, suppliers, factories and all others entities it engages in the supply chain of the Products comply with the Policy.

The Supplier, its subcontractors and/or factories must:

1. Review and verify the authenticity of ALL employees' ID cards.
2. Collate a list of ALL employees detailing: name, age, department, ID card number, date of birth, date of joining.
3. Ensure that refugee workers are afforded equal treatment to other employees and are provided with at least Gross National Minimum Wage, Overtime Premium, weekly rest day and written confirmation of conditions of employment (in the worker's own language).

4. Ensure that refugee workers are working under Voluntary working conditions in line with New Look's Modern Slavery Policy (as amended from time to time).
5. Be aware of and comply with current legislation and any legislative developments.
6. Provide Health & Safety information and/or training in worker's own language.
7. Document all actions taken, including wage payments and receipts.

The Supplier, its subcontractors and/or factories must not:

1. Expel any refugee workers from the factory on the basis of refugee status
2. Retain any original documents provided to them by the employee, addressed to or meant to be passed to the employee.
3. Charge any deposits or money for employment.
4. Make any unauthorised deductions from the wages.
5. Impose any penalty on workers on the basis of refugee status.
6. Impose involuntary working conditions contrary to New Look's Modern Slavery Policy (as amended from time to time).
7. Threaten the workers, their families or obstruct the process of remediation.
8. Hire any workers who do not have legal work permits.
9. Produce any falsified records for employees.
10. Limit access to requested documents or records.

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.

Our [remediation plan](#) is targeted at refugees found working in factories without a valid work permit. Our goal is to formalise their working condition through the application of a work permit, which allows them the same working rights as other national employees. While this process is under way, we ensure the refugee workers are afforded equal treatment through interviews and checks.

As per our Refugee Policy and Remediation Plan we do engage with local NGOs when necessary and appoint the most suitable one evaluated on a case-by-case basis in relation to their expertise and experience with refugees.

Please refer to question 7 for the details of the remediation plan.

The case where we've found refugees, we further investigated their situation in the factory to ensure they were afforded equal treatment. The factory management applied for the work permit of the worker and continued employment.

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

Please refer to question 7 and 10.

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

As per our Refugee Policy and Remediation Plan, workers with refugee status are to be afforded the same level of equality as others and must be provided with at least the gross national minimum wage, overtime premium, weekly rest day and written confirmation of conditions of employment in the worker's own language.

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

Yes. We've made aware all our suppliers about our Refugee Policy and Remediation Plan, we also liaised with ETI, FLA, other brands and Ministry of labour in Turkey to print and distribute leaflets informing factories of rights and responsibilities of refugee workers. If we were ever to be made aware that our suppliers are falling short of these standards then we would follow up with the factory as a matter of urgency and ensure that full remediation is then undertaken with the factory.

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

In Turkey we have mapped factories beyond tier 1 and started to audit them. We have systems and processes in place to check and make sure that our suppliers work to these standards. We are fully committed to maintaining these standards across our entire supply chain, including in Turkey. Additionally, we require written confirmation from our suppliers of the understanding and acceptance of the Refugee Policy and Remediation Plan, which they need to share with all factories and subcontractors.

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?

As member of the Ethical Trading Initiative we support all the efforts that are being made towards improving the situation of Syrian refugees working in the Turkish garment industry and actively engage with other brands, civil society groups and trade unions brought together by the multistakeholder initiative.

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

We're continually engaging with our suppliers and factories to set up effective remediation plans following inspections where all workers must receive and understand health and safety training as well as be provided with their terms and conditions of employment in their local language.

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

As mentioned in question 16, we actively engage with suppliers and factories when it comes to provide training to refugees that may not speak the local language. On a case-by-case basis, we evaluate situations and engage with relevant NGO accordingly.

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

We have engaged with the Turkey Ministry of Labour through the Ethical Trading Initiative along with other stakeholders for developing a set of communication and educational tools in Turkish and Arabic to raise awareness of rights and responsibilities for foreign workers in Turkey.