

Questions for garment brands re Syrian refugees in Turkey

Policy:

1. Does your company have a policy specifically prohibiting discrimination & exploitative practices against Syrian refugees? (If so please provide a link to this policy or provide it as an attachment). How is this policy communicated to suppliers in Turkey?

PUMA: Code of Conduct is posted in the factories, Handbook Social Standards are available in the factories prohibiting all kind of discrimination and exploitive practices in the workplace. Code of Conduct and Handbooks of Standards are available in puma.com as in below link.

Employment of illegal Syrian refugees and potential workplace discrimination against Syrian refugees were announced/communicated to the factories for prevention via email in 2013.

Recent and specific discussions were conducted during the PUMA's Supplier Round Table Meetings in June 2014 and in September 2015, Istanbul, Turkey.

http://about.puma.com/damfiles/default/sustainability/standards/PUMA-s-handbooks/2013_HANDBOOK_SOCIAL_V2_071113-740d803177ca1851a8f57ac7c94ab8ce.pdf

Audits/risk assessment:

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

PUMA: 7 suppliers are available in Turkey.

3. How many have been audited since 1 Jan 2015? What percentage of audits have been unannounced?

PUMA: 7 suppliers are audited during 2015, and 14 % of was conducted 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 since 1 Jan 2015 and what percentage of these audits have been unannounced?

PUMA: Yes, Tier 2, and Tier 3 of Core suppliers are audited beyond Tier 1, and 22 % of T2 and T3 suppliers are audited.

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?

PUMA: No Arabic speakers within the audit & monitoring teams yet, external Arabic speakers as translator will be hired in case of Syrian refugee employment. However none of PUMA supplier do not employ Syrian refugees due to the refugee's illegal position in Turkey.

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

PUMA: Audit team work closely with Sourcing/Production team on production capacity program/planning in supply-chain. Suppliers work with nominated and PUMA audited/authorised subcontractors only.

7. Has your company identified supplier factories employing Syrian refugees in 2015? If the answer is yes please state how many factories, if possible

PUMA: Suppliers do not employ illegal workers.

8. Has your company identified supplier factories employing Syrian child refugees in 2015? If the answer is yes please state how many factories, if possible

Remediation:

PUMA: None.

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.

PUMA: In case of Syrian refugee employment, suppliers should provide equal opportunities and non-discriminatory workplace conditions for the all workers, including Syrian refugees. Supplier will not dismiss Syrian refugee in case of identification, and employment will continue until Syrian refugees will leave the supplier based on their choice.

Note: Core suppliers are encouraged to hire 2 or 3% Syrian refugees with equal opportunities with the local workers. However the suppliers do not want to hire illegal workers.

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.

PUMA: There is no specific remediation plan in place yet for Syrian refugees, however suppliers are aware to provide equal opportunities for the all workers.

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

PUMA: As there is no illegal refugee employment within the current supply-chain in Turkey, our company did not work with the relevant NGOs yet. However PUMA is open to collaborate with local and International NGOs and unions to improve working conditions of refugees.

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

PUMA: Yes, we work with FLA, brands and other local organizations to ameliorate the impact and implement work permit for Syrian refugees.

Capacity building

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

PUMA: As there is no Syrian refugee employment within the current supply-chain, no specific training is provided yet. However suppliers are aware to provide equal opportunities and non-discriminatory workplace conditions for the all workers, including refugees.

PUMA is planning to conduct a specific workshop with the participation of suppliers to discuss potential refugee employment, specifically Syrian refugee employment, their potential issues and prevention of the issues in Turkey within Q1 2016.

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

PUMA: Our Company require same standards in Tier 2 and Tier 3 as Tier 1, suppliers are authorised based on their audit performance.

Stakeholder engagement

- 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?

PUMA: Yes, our Company engage with the relevant stakeholders such as FLA, brands and other CSOs to implement work permit for Syrian refugees in Turkey.

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

PUMA: As there is no Syrian refugee employment within the current supply-chain, this is not a case for us yet.

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

PUMA: As there is no Syrian refugee employment within the current supply-chain, this is not a case for us yet.

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

PUMA: Yes, we work with FLA, brands together with the MoL on this.

Other information

Please provide any further information regarding your company's activities on this issue which you think are relevant.

PUMA: As mentioned above, a specific workshop will be conducted in Q1, 2016 in Turkey with the suppliers to review refugees living and further working conditions in supply-chain.

PUMA is open to collaborate with the relevant stakeholders to improve working conditions of refugees in Turkey.