

# Questions for garment brands re Syrian refugees in Turkey

October 2016

## Company: Puma

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

Yes, our Code of Conduct (CoC) and the relevant policies, tools and procedures explicitly forbid all kinds of discriminative and exploitative practices against workers, including foreign workers.

The PUMA CoC and procedures are communicated to the suppliers before and during business engagement.

PUMA verifies the implementation of all its policies and requirements by its announced and unannounced audits as part of our sustainability program.

Further information on PUMA's sustainability efforts can be found here: <http://about.puma.com/en/sustainability>.

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

Currently, PUMA has five Tier 1 suppliers in Turkey.

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

Each supplier is audited once a year, if necessary twice a year. Until now, one supplier (20 %) was audited without prior announcement during 2016.

**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 have five Tier 2 factories in Turkey. All Tier 2 factories were audited in 2015 and 2016. 40% of these audits were unannounced.

**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?**

Until June 2016, there have been no foreign workers employed within PUMA's supply-chain in Turkey. Consequently, there was no need to hire non-Turkish interpreters for the audits. All workers interviews are conducted without the factory management being present to assure confidentiality.

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

Unauthorized sub-contracting is strictly prohibited and is considered a critical issue. Suppliers are informed about this obligation and there is an explicit clause both in our Code of Conduct and the Manufacturing Agreement between PUMA and its suppliers referring to this matter. PUMA's production and sourcing teams work on production capacity plans for each supplier. In case additional production capacity is needed, PUMA

works together with the relevant supplier on the nomination of potential sub-contractors who are required to comply the same sustainability audit requirements.

**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**

Until July 2016, no Syrian refugees have been employed in PUMA's Turkish suppliers. In July of this year, the first three Syrian refugees have been officially hired by a PUMA core supplier in Turkey.

**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**

Neither Syrian refugees nor any other under-age workers have been identified as being employed in PUMA's Turkish suppliers. Child labour is a zero tolerance issue for PUMA and our social compliance audits have a strong emphasis on guaranteeing that no child labour is used for the production of PUMA goods globally.

**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.**

If such a case was to be found, PUMA would require that the employment is voluntary and properly registered with the relevant authorities. The refugee workers must be treated and employed according to exactly the same standards as the local workers in terms of payment, benefits, working conditions, etc.

**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 Turkish suppliers are informed and fully aware about our requirements. PUMA does not accept any type of discrimination or abuse against any workers, including Syrian refugees in the supply-chain.

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

We collaborate and work with a number of brands, the Fair Labor Association (FLA), United Nations Refugee Agency (UNHCR) and relevant local authorities to remediate living and working conditions of refugees in Turkey.

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

As of January 2016, the Syrian refugees have been officially allowed to work in Turkey. According to our understanding, this official work permit includes social security coverage. PUMA has been one of the brands, which collaborated and worked with the relevant stakeholders to implement work permits for the Syrian refugees. Furthermore, PUMA has collaborated with the Ministry of Labour (MoL) of Turkey, the FLA, the Ethical Trading Initiative (ETI) and other brands to develop a specific pocket-guide for the Syrian refugees to guide them at work life. PUMA encourages its suppliers to employ 2 to 3 %

Syrian refugees in Turkey, and some of the suppliers have just started to employ Syrian refugees with official work permits.

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

We have organized workshops with the FLA for our suppliers to prevent any kind of illegal refugee employment and to encourage our suppliers to employ registered Syrian refugees.

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

We monitor our supply-chain (finished goods suppliers and also key component and material suppliers) to implement our standards in the supply-chain.

**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?**

We collaborate with many stakeholders such as MoL of Turkey, UNCHR, FLA, ETI and with many other brands.

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

According to local law, the suppliers must employ Occupational Health and Safety (OHS) experts. All Turkish PUMA suppliers employ professional OHS experts to identify workplace risks and prevent workers, including non-local workers, and business overall from potential hazards at workplace.

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

We work with MoL of Turkey, UNCHR, FLA, ETI and with many other brands.

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

We have been working with MoL of Turkey, UNCHR, FLA, ETI and with many other brands.

PUMA was one of those few brands which have signed the issue brief for the work permit implementation of Syrian refugees.

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

For further information on our workplace standards and sustainability efforts, please visit:

<http://about.puma.com/en/sustainability/standards>