



SANKO TEXTILE INDUSTRY AND TRADE INC. CO.

Project of Constructing a Ring Yarn Production Facility for the Gaziantep
(Başpınar) Branch of the Company and Increasing the Capacity of Open End
Yarn Production at its Facility Located in Adıyaman

Grievance Mechanism Procedure (Internal and External)

(Plan No: SANKO-PRC-SOC-GMP-001)





January 2023

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List of Abbreviations

Aol	Area of Influence
CİMER	The Presidency's Communication Centre
DCC	Document Control Center or System
EIA	Environmental Impact Assessment
EHS	Environmental Health and Safety
ERP	Emergency Response Plan
ESAP	Environmental and Social Action Plan
ESMS	Environmental and Social Management System
ESP	Environmental and Social Policy
ESS	Environmental and Social Standard
GMP	Grievance Mechanism Procedure
GN	Guidance Note
HR	Human Resources
HS	Health and Safety
HSE	Health, Safety, and Environmental
IFC	International Finance Corporation
KPI	Key Performance Indicator
MGS	MGS Project Consultancy Engineering Trade Ltd. Co.
NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
OHSMP	Occupational Health and Safety Management Plan
OIZ	Organized Industrial Zone
Project Company	SANKO Textile Industry and Trade Inc. Co
PAP	Project Affected People
PRC	Procedure
PS	Performance Standard
SAS	Social Affairs Staff
SEP	Stakeholder Engagement Plan
SEA / SH	Sexual Exploitation and Abuse and Sexual Harassment
TEKSIF	Turkish Textile, Knitting, Clothing and Leather Industry Workers
	Union
The Project	The Project of Constructing a Ring Yarn Production Facility for the
	Gaziantep (Başpınar) Branch of the Company and Increasing the
	Capacity of Open End Yarn Production at its Facility Located in
	Adıyaman
ТКҮВ	Development and Investment Bank of Turkey
WB	Word Bank
YİMER	The Foreigners Communication Center



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1 INTRODUCTION

This Grievance Mechanism Procedure ("GMP") is prepared for internal and external stakeholders of the "The Project of Constructing a Ring Yarn Production Facility for the Gaziantep (Başpınar) Branch of the Company and Increasing the Capacity of Open End Yarn Production at its Facility Located in Adıyaman" ("the Project") located in in Şehitkamil District of Gaziantep Province and Adıyaman Province to be implemented in parallel to Stakeholder Engagement Plan ("SEP") prepared for the Project.

This GMP will be conducted to fulfill the required studies to evaluate the Environmental and Social Impacts of the Project as per the national legislation, Development and Investment Bank of Turkey ("TKYB") Environmental and Social Policy ("ESP"), IFC Performance Standards and Word Bank ("WB") Environmental and Social Standards ("ESS"s). The reference number of this Plan is SANKO-PRC-SOC-GMP-001.

A single GMP has been prepared for Gaziantep (Başpınar) and Adıyaman Facilities as per indicated in Environmental and Social Action Plan ("ESAP") of the Project developed by TKYB.

This GMP is a dynamic document which is subject to revisions and updates in case of the needs and changes in the Project.

1.1 Background

SANKO Textile Industries, established in 1943, is active in cotton and synthetic yarn production, home textiles, weaving and knitting.

The cotton that reaches the SANKO Textile facility is spun into yarn with SANKO's superior quality, modern technology and vast experience of over a century. The production capacity of 500,000 spindles and an extensive product range makes SANKO the largest yarn producer in Turkey and one of the biggest of its kind in the world. SANKO Textile invests heavily in ecologically sound products and production techniques, namely, organic and recycled fibers and sustainable production methods.

SANKO Textile has been licensed to process the Supima Cotton USA and Egyptian Cotton by the relevant boards. SANKO Textile had been granted the Belcoro certificate by Schlafhorst as well as the Open End certificate by Control Union. These certifications attest to the production quality regarding organic cotton. Furthermore, all SANKO Textile facilities hold ISO 9001:2000 Quality Management System Certificates.

The main goals of the company are:

To support the spearhead position of the textile industry within the Turkish economy;



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- To be the symbol of quality, stability and trust in cotton textile production in Turkey;
- To support the Turkish economy by increasing production and employment;
- To support the textile exporters of Turkey by producing any yarn or fabric that they may need in international quality standards;
- To produce environmentally friendly yarn and fabric with eco and organic seals.

Sanko Textile has two facilities within the scope of this project. The first of these is SANKO Textile Gaziantep Başpınar Organized Industrial Zone ("OIZ") Facility. In this facility, yarn production processes are carried out. Within the scope of the project, a new yarn production facility is being built within the body of SANKO Textile Gaziantep Başpınar OIZ. Another facility within the scope of the project is the SANKO Textile Adıyaman Petrol OIZ facility. Yarn production is also carried out the facility. Sanko Textile will increase its capacity in SANKO Textile Adıyaman Petrol OIZ facility within the scope of this project.

1.1.1 Project Location and Area of Influence

The locations of the Project Areas are located in the Gaziantep Başpınar Organized Industrial Zone within the administrative borders of Şehitkamil District of Gaziantep Province and in the Adıyaman Petrol Organized Industrial Zone within the administrative borders of Adıyaman Province. There are industrial facilities in the region that carry out similar activities with the planned Project.

Figure 1-1 indicates the project area in Gaziantep Başpınar OIZ and Figure 1-2 indicates the project area in Adıyaman Petrol OIZ.

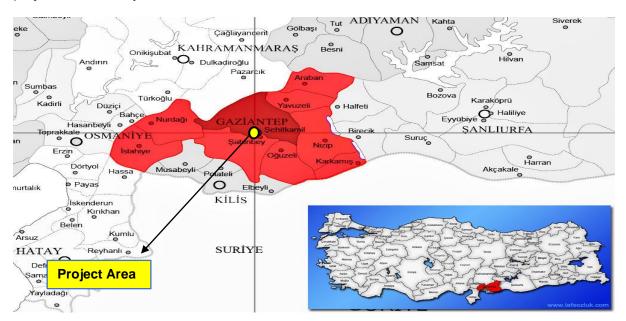


Figure 1-1 Project Area in Gaziantep Başpınar OIZ Facility



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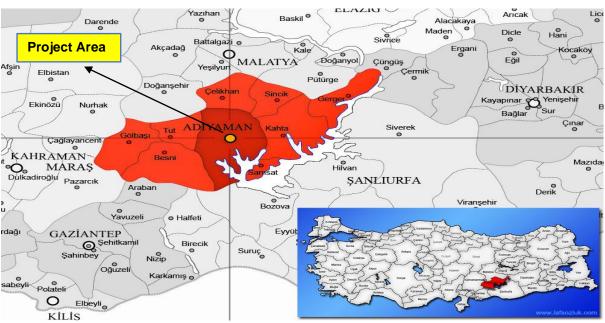


Figure 1-2 Project Area in Adıyaman Petrol OIZ Facility

In the scope of the Project to determine the area of Influences ("Aol"s); access roads will be evaluated by taking into account environmental and social impacts, including existing buildings and infrastructures. The Project area is considered as AoI with a radius of 2 km since similar studies will be carried out with the existing activities within the scope of the Project.

Maps showing the project locations, area of influences and nearest settlements are given in Figure 1-3 and **Hata! Başvuru kaynağı bulunamadı.** for both plant.



Figure 1-3 Nearest Settlements to the Project Area in Gaziantep Başpınar OIZ



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Figure 1-4 Nearest Settlements to the Project Area in Adıyaman Petrol OIZ

The closest settlement populations for both project areas are given in Table 1-1 and Table 1-2. The distances of the project area to the nearest settlements were determined according to the distances of the nearest residences to the project areas.

Table 1-1. Closest Settlements to Project Area in Gaziantep Başpınar OIZ

Settlement	Distance to the	Direction	Population		
	Project Area (km)	Direction	Total	Female	Male
Atabek Neighborhood	~1.55	Northeast	1.926	939	987
Karahüyük Neighborhood	~0.6	Southeast	1.416	707	709

Table 1-2. Closest Settlements to Project Area in Adıyaman Petrol OIZ

Settlement	Distance to the	Direction	Population		
	Project Area (km)		Total	Female	Male
Türkiye Petrolleri Neighborhood	~1.37	Northeast	1,308	666	642
Ataköy Neighborhood	~1.40	Southwest	106	49	57

1.2 Purpose

The purpose of this document is to outline the principles of internal and external grievance mechanisms and how to integrate grievance management into business to eliminate or minimize social risks. The grievance mechanism aims to ensure that all comments,



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suggestions and complaints concerning the Project will be considered transparently and the related measures will be taken.

The processes and responsibilities of this procedure will be defined for both external stakeholders and internal direct and indirect employees.

This procedure is under the responsibility of the Social Affairs Staff ("SAS") of the Project.

This document aims to identify:

- **>** the scope of Grievance Mechanism Procedure and the applicable management interfaces,
- the definition of roles and responsibilities,
- the applicable project standards, project commitments and guidance relevant to this Procedure,
- monitoring and reporting procedures, including Key Performance Indicators (KPIs),
- training requirements and references for supporting materials and information,
- the procedure for stakeholders and employees to voice their grievances in a timely and transparent manner,
- how to minimize community conflict by systematically addressing grievances.

This procedure is not limited but can be updated. The procedure will be reviewed on a minimum annually basis. This procedure will be reviewed on an annual basis to determine if there are any changes or updates required to the procedure unless a more frequent update is required to reflect changing project design or procedures. Any requests for changes to this procedure must be addressed to the executive of this procedure (SAS) and will be subject to appropriate review and approval processes.

1.3 Scope

This document outlines the Grievance Mechanism Procedure which is applied to all internal direct and indirect workers and external stakeholders. The commitment and approach of the Project are on the basis of handling complaints, suggestions and comments that may arise as a direct or indirect result of the environmental and social performance of the Project. The Grievance Mechanism Procedure is not a replacement for stakeholder engagement activities.

This procedure covers all the grievances raised by internal and external stakeholders, including the activities of contractors.

This Procedure is a part of the environmental and social management plans developed for the Project. It overlaps and cross-linkages to number of the other Management Plans given as follows:



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- Environmental and Social Management Plan (SANKO-PLN-HSSE-ESMP-001),
- Emergency Response Plan (SANKO-PLN-HSE-ERP-003),
- Stakeholder Engagement Plan (SANKO-PLN-SOC-SEP-001),
- Air Quality Management Plan (SANKO-PLN-ENV-AQMP-001),
- Waste Management Plan (SANKO-PLN-HSE-WMP-002),
- Occupational Health and Safety Management Plan (SANKO-PLN-HSE-OHSMP-001),
- Human Resources Policy (SANKO-PLC-SOC-HRP-001),
- Carbon Footprint Report.

Accessibility	All employees and stakeholders can raise a comment or submit a grievance easily.
Compliant	A notification provided by a community member, group or institution to the Project that they have suffered some form of offense, detriment, impairment or loss as a result of business activity and/or contractor behavior.
Confidentiality	Anonymous complaints can be submitted and resolved. Raising a complaint will not require personal information or physical presence.
Culturally	A complaint or an issue raised by local communities are considered in the
Appropriate	manner of regional concerns and convenient resolution process will be taken.
External Stakeholder	Groups or individuals outside a business who are not directly employed or contracted by the business but are affected in some way from the decisions of the business, such as customers, suppliers, community, NGOs and the government.
Grievance Mechanism	A formal way that provides a clear and transparent framework for addressing, assessing, and resolving community complaints concerning the performance or behavior of the company, its contractors, or workers.
Grievance:	An issue, complaint and/or dispute that has escalated to the point where it requires third party intervention or adjudication to help resolve it. Typically, grievances are thought of as involving the community as a whole and have been unresolved for some time in a formal manner. Complaint.
Impartiality	A fair and equal grievance procedure will be applied for every complaint or concern submitted by individually or as a community.
Informed Consultation and Participation	On-going relationship based on information, consultation and participation with the indigenous peoples affected by a project throughout the project's life cycle.
Internal	Groups or individuals within a business who work directly within the business,
Stakeholders	such as employees and contractors
Project	Any person who, as a result of the implementation of a project, loses the right
Affected	to own, use, or otherwise benefit from a built structure, land (residential,
People	agricultural, or pasture), annual or perennial crops and trees, or any other fixed
("PAP")	or moveable asset, either in full or in part, permanently or temporarily.
Stakeholder	Any and all individuals, groups, organizations, and institutions interested in and potentially affected by a project or having the ability to influence a project.
Transparency	All the grievances are considered in the scope of the grievance procedure in a clear and understandable manner.



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Vulnerable People People who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status may be more adversely affected by resettlement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.

2 KEY ROLES AND RESPONSIBILITIES

2.1 Key Principles

The Internal (Worker) and External Grievance Mechanisms will be implemented by relying on the following key principles for all the Project-related internal and external comments, issues, and complaints.

- **Transparency:** All the grievances are considered in the scope of the grievance procedure clearly and understandably.
- **Impartiality:** A fair and equal grievance procedure will be applied for every complaint or concern submitted by individuals or as a community.
- **Confidentiality:** Anonymous complaints can be submitted and resolved. Raising a complaint will not require personal information or physical presence.
- Accessibility: All employees and stakeholders can raise a comment or submit a grievance easily.
- **Culturally Appropriate:** A complaint or an issue raised by local communities is considered in the manner of regional concerns and a convenient resolution process will be taken.

2.2 Roles and Responsibilities

Key roles and responsibilities relevant for the implementation of this procedure are outlined in Table 2-1.

Table 2-1. Key Roles and Responsibilities

Roles	Responsibilities		
General Manager	 Approving the Procedure and the resources required for the Project implementation, Ensures this GMP will be implemented during the lifetime of the Project, Determines the policies and targets regarding the social communication, grievance mechanism and stakeholder engagement, Appoints the Deputy General Manager, Evaluates the reports provided by Deputy General Manager and ensures necessary actions were taken, Approving the social budget of the Project determined and submitted by Social Affairs Staff ("SAS") / Human Resources ("HR") Manager. 		
Deputy General Manager	Ensuring this procedure is implemented properly during the lifetime of the Project,		



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Roles	Responsibilities			
	Coordinates with parties for proper implementation of this GMP and SEP, Providing a processory recovered for the implementation of the second seco			
	 Providing necessary resources for the implementation of the Grievance Mechanism Procedure, 			
	 Reports to the General Manager about performance of the system, Supporting SAS on the evaluation of the relevance of grievances 			
	collected,			
	 Deciding final answers to the OHS and social grievances raised by employees, the local community, and local institutions. 			
	 Implementing this GMP and SEP, Ensuring the Project's compliance with the national and international 			
	standards and requirements set out in this Procedure,			
	 Coordinating the relevant parties for the proper implementation of this Procedure, 			
	 Reporting to the Deputy General Manager about the system performance, 			
	 Ensuring national and international legislation/guidelines which are applicable to the Project activities are identified and tracked, 			
	 Recording all formal and informal engagement activities with local communities in Document Control Centre ("DCC"), 			
	 Keeping records of the types of leaflets, brochures, newsletters prepared and distributed, by location and inserting this detail into stakeholder engagement reports, 			
	 Monitoring and recording the social responsibility activities carried out in the scope of the Project and inserting those details into stakeholder engagement reports, 			
	• Forming relationships with the Project stakeholders,			
	 Organizing stakeholder meetings to collect the grievances, concerns and/or requests actively as required, 			
Social Affairs Staff	 Providing regular reporting back to the community on the management related to community grievances, 			
Resources (HR)	 Determining and providing the necessary training materials for all employees, 			
Manager/	 Keeping the records of the complaints and/or suggestions in the Grievance Database with details (by whom, date, status, etc.) (see: Appendix B: Grievance Database), 			
	 Searching the causes of the grievances and the social incidents that cause; injuries, delays or stoppage in the work and disputes among the Project and communities, 			
	 Monitoring all complaints and ensuring that all complaints are resolved and closed properly in a timely manner, 			
	 Following the results of complaint and reporting on a weekly, monthly and annual basis, 			
	 Recording and reporting general and local employment rates and complaints which are received verbally or observed visually, 			
	• Filling out the "Complaint Register Form" (Appendix A: Complaint			
	Register Form), keeping the grievance records in "Grievance Database" (Appendix B: Grievance Database and monitoring the			
	grievances through the database, and filling out "Consultation Form"			
	(Appendix C: Consultation Form, when necessary, and proceeding grievance closure through "Grievance Closure Form" (Appendix D:			
	Grievance Closure Form in accordance with this GMP,			
	 Giving the feedback to the stakeholders about the results of their grievances through Complaint Register Form within 30 calendar days (complainants who have provided their names and contact information 			



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Roles	Responsibilities		
	will be notified within 5 working days that the grievance solution process has started and after the grievance closed).		
Social Compliance / Communication Team	 They are the teams working under the Project's SAS / HR Manager, Performing internal and external communication, Having responsibility for the implementation of this GMP by fulfilling the Project requirements together with SAS / HR Manager, Determining necessary resources for proper implementation of this GMP and reporting them to the SASA / HR Manager. 		
Environmental Management Representative	 Reporting environmental risks to the Deputy General Manager, Planning and implementing environmental trainings in accordance with the national and international standards, Evaluating the risks and preparing precautionary proposals by conducting investigations of the damages that the emergencies in the surrounding area can cause to the environment, to the Project and employees during and after the emergency, Ensuring that measures are taken according to the risks that arise during and after the emergency and coordinating the relevant activities, Performing routine environmental inspections and reporting the results of the inspections to the Deputy General Manager, Control of the environmental performances and records of the Contractors, preparing an annual report on environmental status of the Project, Evaluating the activities of that year, evaluating the issues to be included in the following year's work program according to the experience obtained, and making an offer to the Deputy General Manager. 		
Health and Safety Representative	 Determining the OHS impacts and hazards in accordance with the actions, potential mitigation measures and measures to eliminate any potential social grievances, Ensuring that all provisions in the Contractor engagements regarding OHSI requirements as per the Project Standards and auditing the performance of the Contractors on those requirements, Supporting SAS / HR Manager to find solutions to the answers of grievances raised by employees, the local community and local institutions regarding environmental issues. 		
Health, Safety and Environment (HSE) Staff	 Determining the OHS and environmental hazards in accordance with the actions, potential mitigation measures and measures to eliminate any potential social grievances, Ensuring that all provisions in the Contractor engagements regarding HS and environmental requirements as per the Project Standards and auditing the performance of the Contractors on those requirements, Supporting SAS / HR Manager to find solutions to the answers of grievances raised by employees, the local community and local institutions regarding health and safety issues. 		
Contractor Representatives / Project Responsible	Ensuring that all requirements in this GMP are complied with.		

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Roles	Responsibilities
Contractors / Subcontractors / Suppliers & Employees	 Not making any commitment in their interactions with the stakeholders beyond their competence, Complying with the requirements of this GMP and other relevant Management System documentation of the Project.

3 PROJECT STANDARDS

The implementation and the procedure of this plan developed for the Project will comply with the related national and international requirements and standards. The Project Standards involves:

- applicable Turkish Standards and Turkish EIA requirements,
- other commitments to and requirements of Turkish Government authorities,
- TKYB Environmental and Social Policy,
- applicable international standards and guidelines,
- Word Bank Environmental and Social Standards (ESSs).
- International Finance Corporation (IFC) Performance Standards (PSs)
- interim advice on "Safe Stakeholder Engagement in the context of COVID-19" by IFC.

3.1 Applicable National Standards

The Constitution of The Republic of Turkey

The main document of the national requirements and standards is "The Constitution of The Republic of Turkey" which comprises articles related to human and labor rights, peace of the community and stakeholder engagement of the Project. These articles are as follows:

I. Legal Egalitarianism

ARTICLE 10. Everyone is equal before the law regardless of distinction as to language, race, color, sex, political opinion, philosophical belief, religion or any similar reasons. Men and women have equal rights which are the obligation to be ensured exist in practice by the government. Measures taken for this purpose shall not be interpreted as contrary to the principle of equality.

II. Prohibition of Forced Labor

ARTICLE 18. Nobody can be forced to work. Drudgery is prohibited. Employers are not allowed to take deposits of money from workers and retain ID Cards.

III. Freedom of Thought and Opinion



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ARTICLE 25. Everyone has the right to freedom of thought and opinion. For whatever reason and purpose, nobody can be forced to explain their thoughts and opinions; cannot be condemned and accused of their opinions.

IV. Freedom of Expression and Dissemination of Thought

ARTICLE 26. Everyone has the right to express and disseminate his thoughts and opinion by speech, in writing or pictures or through other media, individually or collectively. This right includes the freedom to receive and give information and ideas without interference from official authorities.

V. Right of Petition

ARTICLE 74. Turkish citizens and foreign residents have the right to raise requests and complaints concerning themselves or the public in writing to the competent authorities and the Turkish Grand National Assembly.

Law on The Right to Information

Everyone has the right to give information on the activities of public institutions and professional organizations, which qualify as public institutions. The procedure and the basis of the right to information according to the principles of transparency, equality and impartiality are regulated in the *Law on Right to Information* numbered 4982 and issued on 24.10.2003 with the official gazette number of 25269.

Law on The Use of Right to Petition

ARTICLE 3. Everyone has the right to apply in writing to the Turkish Grand National Assembly and the component authorities concerning the requests and complaints concerning themselves or the public according to this article of the *Law on the Use of Right to Petition* No. 4982 which was issued on 01.11.1984 with the official gazette number of 3071.

Labor Law

The Principle of Equal Treatment

ARTICLE 5. Discrimination in employment is prohibited. No discrimination based on language, race, sex, political opinion, philosophical belief, religion and sex or similar reasons is permissible in the employment relationship. Except for biological reasons or reasons related to the nature of the job, the employer must not make any discrimination, either directly or indirectly, against an employee in the conclusion, conditions, execution and termination of his/her employment contract due to the sex or maternity of employee. The differential remuneration for similar jobs or work of equal value is not permissible.



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The Worker's Right of the Immediate Termination for the Valid Reason

ARTICLE 24. Whether or not the duration is fixed, the worker can terminate before the end of the contract or without waiting for the notice period. The employment contract is not subject to any special form unless the contrary is stipulated by the Law.

Overtime Work

ARTICLE 41. Overtime work can be done for reasons such as the general benefits of the country and increased production. Overtime work requires the employee's consent.

ARTICLE 42. Compulsory overtime work is only allowed for all or some of the employees in case of a breakdown, whether actual or threatened or in the case of urgent work to be performed on machinery, tools or equipment or in case of force majeure. Compulsory overtime work shall not exceed the time necessary to enable the normal operating of the establishment.

Working Age and Prohibition of Child Employment

ARTICLE 71. The employment of children under the age of fifteen is prohibited. However, children who have reached the age of fourteen and have completed their primary education may be employed in light labor that will not hinder their physical, mental or moral development.

Unions and Collective Agreements Law

Workers are covered by the legislation numbered of 6356 (dated on 07.11.2012, Official Gazette No. 28460). There are four types of collective agreements regulated which are workplace collective bargaining agreement, enterprise collective agreements, group collective agreements, and framework agreements.

Environmental Law

The main law of National Environmental Legislation is the Environmental Law numbered 2872 which was issued on 11.08.1983 with the official gazette number of 18132. In this law, the Turkish Regulation on *Environmental Impact Assessment (EIA)* (Official Gazette, 29 July 2022, no 31907) is defined which includes a limited public disclosure process. The purpose of the environment law is to protect and improve the environment which is the common asset of all citizens; make better use of, and preserve land and natural resources in rural and urban areas; prevent water, land and air pollution; by preserving the country's vegetative and livestock assets and natural and historical richness, organize all arrangements and precautions for improving and securing health, civilization and life conditions of present and future generations in conformity with economic and social development objectives, and based on certain legal and technical principles.



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When it comes to the public consultation requirements, it is mandatory to hold at least one public participation meeting for the Projects which is under the Annex-I of the EIA Regulation, while no requirement is needed for the projects under the Annex-II of the same regulation.

3.2 Environmental and Social Policy of TKYB

Within this scope, the TKYB closely follows and implements national legislation, laws and regulations to manage its environmental and social impact while fulfilling its legal obligations. It consistently follows national and international developments within the industry and best practices in environmental and social issues. The Bank supports and joins all kinds of environmentally friendly activities and volunteering efforts particularly concerning education and the environment, along with all public and civil society organizations as well as other shareholders who enhance social prosperity and development.

While reducing its negative impact stemming from operational activities, the Bank supports positive environmental movements with its efforts to increase energy and resource efficiency. To this end, the Bank regularly monitors energy, water and paper use, air emissions, waste generation and greenhouse gas emissions and aims to improve its reduction performance.

The Environmental Management System targets the principles below:

- Reduce the use/waste of resources and the generation of waste while we carry out our activities and services without any loss in our quality of service,
- Create a positive environmental impact and awareness through the Bank's activities and services,
- Minimize our damaging impact on human health and the environment,
- Ensure sustainability and continuous improvement of the established system,
- Support all environmentally friendly activities and all kinds of volunteering activities,
- Establish a management system that is world-class and compliant with the TS-EN-ISO
 14001 Environmental Management System Standards.

3.3 Applicable International Standards, Legislations and Guidelines

International standards to be observed by the Project are the IFC Performance Standards and WB ESSs. Particularly, IFC: Performance Standard 1 shall be complied with as they address stakeholder engagement. Basic objectives of international standards and guidelines are as follows:



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- **7** To define project affected people and communities and other relevant parties influencing, and/or that may be affected by the activities and implementations of the Project; and to develop an appropriate procedure to identify and confirm them,
- To prepare a database comprised of the relevant stakeholder of the Project and its associated facilities and to continuously update it,
- To review this database in consultation with relevant parties,
- To provide necessary information and consultancy services to all stakeholders by facilitating their required contributions on the environmental and social issues that may affect them.
- To continuously protect respectful and constructive relations with stakeholders based on mutual confidence and honesty, and by respecting the values of the stakeholders.

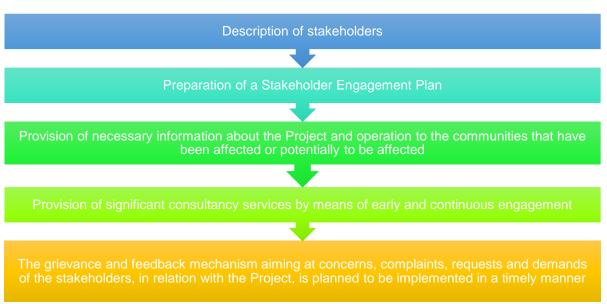


Figure 3-1. Main Requirements of International Standards and Guidelines regarding Grievance Mechanism

3.3.1 IFC Performance Standards

The key requirements related to stakeholder engagement from IFC Performance Standard 1 can be summarized as follows:

- An Environmental and Social Management System (ESMS) should be prepared and implemented, and the element of stakeholder engagement should be included,
- The range of stakeholders should be identified, if affected communities may be adversely impacted, then a Stakeholder Engagement Plan should be developed and implemented.



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- When applicable this GMP is to include differentiated measures to allow for the effective participation of those identified as disadvantaged or vulnerable.
- Affected Communities will be provided with access to relevant information on (i) the purpose, nature, and scale of the Project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; and (iv) the envisaged stakeholder engagement process and (v) the grievance mechanism.
- A process of effective consultation will be conducted in a manner that allows affected communities to express their views on project risks, impacts and mitigation measures, and will allow for the Project owner to respond to them.
- When potentially significant adverse impacts on affected communities exist, an Informed Consultation and Participation is to be conducted.

IFC has defined "Key Concepts and Principles of Stakeholder Engagement" in its A Good Practice Handbook. The building blocks of stakeholder engagement are listed below:

- Stakeholder Identification and Analysis
- Information Disclosure
- Stakeholder Consultation
- Negotiation and Partnerships
- Grievance Management
- Stakeholder Involvement in Project Monitoring
- Reporting to Stakeholders.

3.3.2 WB Requirements

The objectives of ESS 10 Stakeholder Engagement and Information Disclosure are set by WB as follows:

- To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.
- To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.



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- **7** To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them.
- **7** To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow Borrowers to respond to and manage such grievances.

Stakeholder engagement is the continuing and iterative process by which the Project identifies, communicates, and facilitates a two-way dialogue with the people affected by its decisions and activities, as well as others with an interest in the implementation and outcomes of its decisions and the project. It takes into account the different access and communication needs of various groups and individuals, especially those more disadvantaged or vulnerable, including consideration of both communication and physical accessibility challenges. Engagement begins as early as possible in project preparation because early identification of and consultation with affected and interested parties allows stakeholders' views and concerns to be considered in the project design, implementation, and operation.

WB ESS10 requires the Project to engage in meaningful consultations with all stakeholders. The Projects should provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation.

Moreover, The Project should maintain, and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received, and a brief explanation of how the feedback was taken into account, or the reasons why it was not.

Within the scope of the Project, there exists an Apprenticeship Training Center which the apprentices are trained and working within the framework of legal obligations. The details are given within this plan. At this point, WB ESS2: Labor and Working Conditions emphasizes on the child labor and minimum age as:

"A child under the minimum age established in accordance with this paragraph, will not be employed or engaged in connection with the project. The labor management procedures will specify the minimum age for employment or engagement in connection with the project, which will be the age of 14 unless national law specifies a higher age."



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Documentation and verification of age are important steps in preventing employment and/or engagement of child labor. The Project should include the following, which are undertaken before the employment or engagement of a child labor and kept on file:

- Obtaining written confirmation from the applicant of their age.
- Where there is any reasonable doubt as the age of the applicant, requesting and reviewing available documents to verify age (such as birth certificate, national identification card, medical or school record, or other document or community verification demonstrating age).

If a child under the minimum age is discovered working on the project, measures will be taken to terminate the employment or engagement of the child in a responsible manner, taking into account the best interest of the child. Possible measures will be outlined in the labor management procedures.

A child over the minimum age and under the age of 18 will not be employed or engaged in connection with the project in a manner that is likely to be hazardous, interfere with the child's education, or be harmful to the child's health or physical, mental, spiritual, moral, or social development. Work considered hazardous for children is work that, by its nature or the circumstances in which it is carried out, is likely to jeopardize the health, safety, or morals of children. Examples of hazardous work activities prohibited for children include work: (a) with exposure to physical, psychological, or sexual abuse; (b) underground, underwater, or working at heights or in confined spaces; (c) with dangerous machinery, equipment or tools, or involving handling or transport of heavy loads; (d) in unhealthy environments exposing children to hazardous substances, agents, or processes, or to temperatures, noise, or vibration damaging to health; or (e) under difficult conditions such as working for long hours, during the night, or in confinement on the premises of the employer.

A child over the minimum age and under the age of 18 may be employed or engaged in connection with the project only under following specific conditions:

- An appropriate risk assessment is conducted prior to the work commencing and
- The Project conducts regular monitoring of health, working conditions, hours of work, and the other requirements of the ESS2.

To support monitoring, ESS2 Guidance Note recommends creating and maintaining a separate record of all project workers over the minimum age and under 18. This record should include the details of their enrolment in school or vocational training programs.



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3.4 Project Standards

The Project will meet both national and international standards. In case those differ, the most stringent requirement will be met.

4 INTERNAL AND EXTERNAL GRIEVANCE MANAGEMENT

4.1 Grievance Mechanism

Grievances are complaints, suggestions and problems that employees and external stakeholders raise on a specific issue. The spectrum of grievances ranges from major and potentially illegal issues such as discrimination or victimization in the workplace to more minor day-to-day disputes of local stakeholders or Project Affective People (PAP).

This Grievance Mechanism Procedure (SANKO-PRC-SOC-GMP-001) of the Project provide a clear and transparent framework to deal with difficulties. A grievance mechanism is a structured process that allows complainants to address disputes, fear and aspirations, concerns in a fair, easily accessible and transparent manner.

Grievance procedures will be coordinated through the appointed Social Affairs Staff (SAS) with the help of HSE Staff and HS and Environment Representatives who are the primary interfaces between the community and the Project. Complainants will have the chance to provide their names in order to gain effective feedback on their complaints/grievances, however; confidentiality procedures will be put in place to protect the complainant, as appropriate. The SAS is expected to conduct a bridge between the company and the employees, in order to formalize the grievance process and procedures, as it is existent, but in a non-formal way.

The grievance mechanism will be informed to the stakeholders so that they are aware of the process, having knowledge of the right to submit a grievance and understand how the mechanism will work and how their grievance will be addressed. In most cases, a grievance or complaint will be submitted by a stakeholder or local resident by phone, in writing or by speaking with the Project SAS, if it is not anonymous.

In addition, the mechanism shall also constitute an internal grievance process, conducted specifically for employees, subcontractors and other suppliers of the Project.

The internal and/or external grievance mechanism process to be followed to resolve the grievances is described in below Figure.



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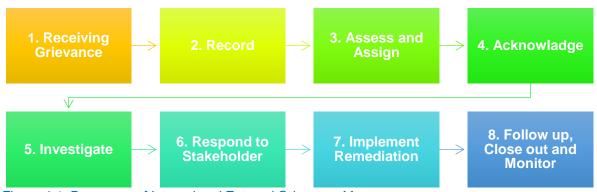


Figure 4-1. Processes of Internal and External Grievance Management

4.1.1 Principles of the Grievance Mechanism (Internal and External)

The grievance mechanism is developed to cover the following:

- **Simplicity and necessity:** Procedures will be kept as simple as possible, avoiding unnecessary administrative stages. Fair and transparent, informative for relevant people.
- **Keeping it up to date:** The process will be regularly reviewed jointly by the SAS, HSE Staff and HSE Manager. Regular monitoring and evaluation should be conducted continuously.
- **Confidential and impartial process, non-retribution:** The process will be confidential and impartial, without employees fearing retribution.
- **Reasonable timescale:** A certain timeframe to deliver responses and solve the problems mentioned will be followed, which is 30 calendar days as the assigned duration for grievance resolution.
- **Keeping of records:** Grievances are tracked and recorded in a written manner, hard and soft copies, if possible.
- Workers should not experience retribution for raising concerns through such mechanisms.

4.1.2 Grievance Mechanism Communications

Employees should know whom they notify to in case of the event of a grievance and the support is available. Managers (General Manager, Deputy General Manager, Environmental Management Representative and HS Representative, etc.) should be familiar with procedures. Details about the procedures should be easily available, for example in employee handbooks or flowcharted in local places and in DCC.

For the collection of *internal* grievances from employees:



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- Grievance mechanism process are communicated with all employees (including contractor's employees) during the recruitment process and the first induction training sessions also include the stakeholder engagement and grievance mechanism process;
- Communication about the grievance mechanism is repeated regularly with the toolbox trainings;
- The grievance/suggestion tools are available at the social places (social resting rooms, changing rooms, etc.) in the Project area for internal grievances which are in use by the workers. The tools are connected to internal network, which makes the grievances able to be delivered to relevant departments at any time; and
- All employees are aware of the location of those tools and how to submit their grievances; the employees should be informed in case of any change regarding the location of those tools.

For the collection of *external* grievances from community:

- Grievance mechanism process will be communicated with external stakeholders during stakeholder engagement meetings;
- The grievance/suggestion boxes will be made available at the Mukhtars' offices or villagers' gathering points (such as tea houses etc.) in the nearest settlements, and the boxes will be checked regularly (at least once a week); and
- Stakeholders will be aware of the location of the grievance/suggestion boxes and how to submit their grievances (either through web site, by telephone or with grievance/suggestion boxes).

The grievance mechanism constitutes two parts: External and internal (Workers, subcontractors and suppliers of the Project). These two mechanisms will be run by the Project SAS. During the resolution of the internal or external grievances, different units can be collaborated such as Quality Insurance, HS and Environment Representatives and Social Compliance / Communication Team etc.

SANKO Textile is sensitive to social responsibility, human rights and ethical issues in its activities. SANKO Textile's <u>"Social Responsibility Policy"</u>, which covers the issues of human rights, child labor, wages and working hours, forced labor, discrimination, harassment or abuse, women's rights, union rights, sustainability and anti-corruption, reflects the company's approach to social rights and freedoms and the determined reflects its core principles (see Appendix E: SANKO Textile's Social Responsibility Policy).

On the other hand, SANKO Textile has "Codes of Ethics", which deals with the attitudes and behaviors that all personnel, including managers, should display in the working environment



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and their approach towards their customers. "SANKO Textile Code of Ethics" is in Appendix F: SANKO Textile's Codes of Ethics Procedure.

Moreover, SANKO Textile attaches importance to providing necessary organizational activities to prevent discrimination based on gender, race, language, religion, age, physical disability, marital status, sexual orientation, nationality, political preference or social group and ethnic origin. In accordance with this approach, there is a "Discrimination Procedure" put into practice by SANKO Textile (see Appendix G: SANKO Textile's Discrimination Procedure)

4.2 Internal (Worker) Grievance Management Process

SANKO Textile's employees find it more practical and solution-oriented to verbally convey their complaints to their superiors, and they prefer this way. Employees who may be direct workers or third party/contracted workers should be encouraged to raise written complaints, comments and concerns.

Information on how to express complaints, opinions and suggestions to workers will be provided during the induction training and refreshment trainings. Grievance submissions will not be used in any way to intimidate those submitting the complaints.

Social Affairs Staff will treat the grievances seriously and take prompt, appropriate actions. "Social Affairs Staff" will have the main responsibility to collect the complaints. The complaints will be discussed with management in order to gather accurate information about a given complaint. Social Affairs Staff will process the complaint/concern and provide a resolution. Resolutions of complaints will be developed in accordance with relevant Turkish laws, regulations, as well as international requirements. Feedback will be provided to those involved.

It is possible to extend the process for the complex grievances, and workers will be informed about the schedule of the process. All parties should get a reasonable agreement on the corrective actions during solution process. Social Affairs Staff aims to respond in cooperation with the related department and solve each complaint within 30 calendar days. The grievance mechanism does not replace other channels as defined by law and during the grievance process, all the requirements of this procedure should be fulfilled.

There is a labor union called Turkish Textile, Knitting, Clothing and Leather Industry Workers Union ("TEKSİF"), where employees can convey their problems, complaints and expectations to the SANKO Textile's managers.

Employees can find more practical solutions by conveying their problems, suggestions and complaints to the labor union representative. SANKO Textile managers hold a monthly meeting with TEKSIF Labor Union Representatives on the complaints and expectations of the



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employees. An example of meeting minutes is given in Appendix J: Meeting Minutes with TEKSIF.

In order for the employees to convey their suggestions to SANKO Textile, there are instructions for use of the "Wish Complaint and Suggestion Box" and the "Near Miss Notification Mechanism" at the Adıyaman Petrol OIZ facility. There is no wish, complaint and suggestion box in the project construction site located in Gaziantep Başpınar OIZ and complaint and suggestion boxes shall be placed

Figure 4-2 includes the image of the Wish Complaint and Suggestion Box and Figure 4-3 includes the image of the "Near Miss Notification Mechanism Usage Instruction" at SANKO Textile Adıyaman Petrol OIZ Facility.



Figure 4-2 Wish Complaint and Suggestion Box at SANKO Textile Adiyaman Petrol OIZ Facility



Figure 4-3 Near Miss Notification Mechanism Usage Instruction at SANKO Textile Advaman Petrol OIZ Facility



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On the other hand, in Figure 4-4, there is the image of the Near Miss Notification Form opened on mobile with the QR code in the Near Miss Notification Instruction.



Figure 4-4 Near Miss Notification Form used in SANKO Textile Adıyaman Petrol OIZ Facility

SAS keeps a record of the Near Miss Notification Forms and provides the necessary feedback; she/he is responsible for opening the Suggestion Box and evaluating the recommendations.

4.3 External Grievance Management Process

Besides internal Grievance Mechanism Procedure, external grievance management process will be implemented for grievances raised by all stakeholders such as local communities, governmental or non-governmental organizations, universities, media etc.

The steps of the grievance management process consist of (i) receiving the grievance, (ii) assessing, (iii) sending acknowledgement, (iv) investigating, (v) feedback to stakeholder, (vi) implementing the remediation activities and (vii) closure.

SANKO Textile has a document called "Request and Complaint Procedure" which regulates the processes of communication with internal and external stakeholders, submission and evaluation of complaints and suggestions to the company. The Procedure is contained in Appendix H: SANKO Textile's Request and Complaint Procedure.



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4.3.1 Receiving Grievances

Grievances are received through all available channels such as phone, e-mail, grievance forms, website, contractors and etc. The stakeholder can raise a grievance by filling out the grievance form. Once the form is completed then "Social Affairs Staff" will process the form according to the Grievance Mechanism Procedure.

Table 4-1. Contact Details of the Project

SANKO Textile Industry and Trade Inc. Co.	Contact Person on the Project Site
Website: https://www.sankotextile.com/	
Social Media Accounts:	Contact Persons:
https://www.linkedin.com/company/sankotextile/ https://www.instagram.com/sankotextile/	Mutlu TOKSÖZ
Tittps://www.iristagram.com/sankotextile/	Head Of Sustainability
Project Site Address:	E-Mail: mutlu.toksoz@sanko.com.tr
3. Organize Sanayi Bölgesi 83029 nolu cadde No:4 Şehitkamil / Gaziantep	Phone: +90 342 211 6429 Gülnur EMRE
Türkiye Petrolleri, Organize Sanayi-14. Sk. No:4, 02040 Petrol Osb/Adıyaman Merkez/Adıyaman	HR Manager E-Mail: gulnur.emre@sanko.com.tr
E-mail: marketing@sanko.com.tr Phone: +90 342 211 60 00	

The Complaint Register Form (see Appendix A) will be used to collect the information about grievances, concerns and the complainant. All grievances will be recorded and collected in the Grievance Database (see Appendix B).

The existing contact details of the Project is given above. The contact information regarding the assigned SAS (name and contact number/e-mail address) will be included when this Procedure is updated.

4.3.2 Assessment and Investigation of Grievances

Each evaluation and investigation steps will be followed when a grievance/concern is received and registered into "Grievance Database" (see *Appendix B*). The Social Affairs Staff (SAS) investigates the grievance and makes the first evaluation with the help of HS and Environment Representatives, when necessary. The Project investigates the grievance and involves appropriate departments in its investigation and formulation of a resolution.

The complainant may be contacted (if not anonymous) to gather more information, using the "Consultation Form" (see Appendix C). Any correspondence with the complainant will be



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recorded in the "Grievance Database". When final decision is made on the grievance, feedback will be given to stakeholder.

4.3.3 Feedback to Stakeholders

Feedback duration on the status of the delivered grievance, is assigned as 30 calendar days, after the receipt of the grievance. If the complainant has provided a name and contact information, this will give the chance to inform them about the status of their grievance within 5 working days of grievance receipt. Complaints received anonymously will be investigated in the same manner as non-anonymous complaints, but no formal response will be issued.

4.3.4 Proposed Resolution / Corrective Action

Within 30 calendar days of receipt of the grievance, SAS of the Project will formally communicate a proposed resolution or corrective action to the complainant (if not anonymous) and discuss it with the complainant. The complainant will be informed about the methodology followed. All communication will be recorded in the "Grievance Database" (see Appendix).

4.3.5 Closure of Grievances

The grievance procedure of the Project aims to formally close out every grievance within 30 calendar days after receiving it, unless an alternative agreement is made with the complainant. Note that this alternative agreement must be reached within these 30 calendar days. Closure requires the signature of the complainant (if not anonymous) on the Grievance Closure Form (see *Appendix D*), which details the agreed resolution. The signed "Grievance Closure Form" will be recorded in the "Grievance Database".

4.3.6 Non-Resolution Case

If a grievance cannot be resolved although efforts will be made to solve the concern within the set timeframe, the Project will involve other external experts, neutral parties or local and regional authorities, as necessary and appropriate.

Moreover, an explanation to the complainant (if not anonymous) about why the grievance cannot be resolved will be given.

4.4 Customer Grievances

The "Customer Complaints Procedure", which specifically regulates the demands, suggestions and complaints of external stakeholders, is given in Appendix I: SANKO Textile's Customer Complaints Procedure.



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4.5 Sexual Exploitation, Abuse and Sexual Harassment (SEA/SH)

Sexual Exploitation and Abuse / Sexual Harassment ("SEA/SH") is a risk for any project that interfaces with a community. However, risks increase in settings where incidents of sexual exploitation, abuse and sexual harassment (SEA/SH), are normalized and/or committed with impunity, and where survivors are unlikely to seek assistance due to social stigma, retaliation, or other security issues. When the rule of law and basic protective infrastructure is lacking, further contributing to risks of SEA/SH. In order to minimize those risks, following mitigation measures will be taken within the scope of the Project:

- Sensitization of the managements of the Project on SEA/SH issues will be provided.
- Trainings regarding SEA/SH will be provided to all Project workers.
- All Project workers will sign and be informed about the Code of Conduct.
- All details of the SEA/SH survivors will be kept strictly confidential in the Grievance Register Database.
- Those kinds of SEA/SH claims/issues will be evaluated/addressed and responded directly by the Ethical Committee formed by General Manager, SAS / Human Resources Manager and other Managers.
- When the claim is proved, necessary legal sanctions will be applied, or their enforcement will be ensured.
- If necessary, female personnel (other than SAS) will be assigned for the registration of SEA/SH grievances, and a separate training will be conducted only for the female workers in order to inform and raise awareness on the SEA/SH response mechanism.
- Moreover, SANKO Textile plan to establish a special mechanism for SEA/SH in accordance with their Ethical Rules Instructions and Employees Work Discipline Procedure.

4.6 Other Grievance Mechanism Procedures

In addition to SANKO Textile's grievance mechanism, the residents and/or Project stakeholders can apply to TKYB's existing grievance mechanism and national-level grievance mechanisms such as The Presidency's Communication Centre ("CİMER") and The Foreigners Communication Center ("YİMER").

TKYB's Environmental Complaint Mechanism: Any parties directly and/or significantly affected by environmental impacts arising from the TKYB's operational or financial activities can submit a complaint to the TKYB. Complaints are systematically archived and promptly handled. The online form available on the contact webpage of TKYB can be filled. Also, the phone number and physical address of the general directorate of TKYB is given as:



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www.kalkinma.com.tr

Online complaint/suggestion form: https://kalkinma.com.tr/en/contact-us/contact-

information

Phone number: +90 216 636 87 00

Fax number: +90 216 636 89 28

E-mail address: haberlesme@kalkinma.com.tr

Physical address: Saray mahallesi. Dr. Adnan Büyükdeniz caddesi. No:10 34768

Ümraniye/İstanbul/Türkiye.

Presidency's Communication Center: The Presidency's Communication Centre ("CİMER") has been providing a centralized complaint system for Turkish citizens, legal persons and foreigners. CİMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities.

www.cimer.gov.tr

Call Centre: 150

> Phone number: +90 312 525 55 55

Fax number: +90 0312 473 64 94

Mail addressed to Republic of Turkey, Directorate of Communications

Individual applications at the community relations desks at governorates, ministries and

district governorates.

Foreigners Communication Center: The Foreigners Communication Center ("YİMER") has been providing a centralized complaint system for foreigners. YİMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities.

www.yimer.gov.tr

Call Centre: 157

Phone number: +90 312 5157 11 22

Fax number: +90 0312 920 06 09

Mail addressed to Republic of Turkey, Directorate of Communications

Individual applications at the Republic of Turkey General Directorate of Migration

Management.



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5 MONITORING

5.1 Review and Revision of This Procedure

This procedure will be reviewed on minimum annually basis. The revision of this procedure will be the responsibility of the "Social Affairs Staff" in cooperation with the Social Compliance / Communication Team, who are the custodian of the procedure.

If material changes to operation procedures are required, the procedure may be updated on an "as required" basis. If there is any revision on this procedure, it will be uploaded to the Document Control Center of the Project to ensure that all staff has access to the latest version of this procedure.

5.2 Overview of Monitoring Requirements

In compliance with the Project Standards which is described in Section 3 of this procedure, monitoring measures will be implemented to prevent the reoccurrence of grievances and monitoring management. Therefore, this grievance mechanism will be subject to periodic reviews to decrease the systemic problems and maintain the resolution process efficiently.

If monitoring identified non-conformance with the Project Standards, these will be investigated, and appropriate corrective actions identified. The overall grievance management performance will be monitored and evaluated according to the key performance indicators.

5.3 Key Performance Indicators (KPIs)

The following table summarizes the key performance indicators and associated key monitoring actions that can be used to assess the progress and effectiveness of the grievance management performance.

Table 5-1. Key Performance Indicators (KPIs)

KPI	Target	Monitoring Measure
Number of community complaints or grievances	Total number reduced year on year	Grievance Database
Number of customer complaints or grievances	Total number reduced year on year	Grievance Database
Number of internal complaints or grievances	Total number reduced year on year	Grievance Database
% of complaints that are responded within 5 working days	Delivery of regular reports to stakeholders on the outcomes of the Grievance Mechanism	Reporting
% of complaints that are closed within 30 calendar days	100% of the complaints are closed within 30 calendar days	Grievance Database



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KPI	Target	Monitoring Measure
Auditing Grievance		
Procedure to ensure that it	Annual audit complete target of 100% of	
is being implemented and	grievances close out to satisfaction of	Audit Report
grievance are being	complainants within 30 working days	
adequately addressed		

5.4 Key Monitoring Activities

The key monitoring activities are used to assess grievance management. The Project will also monitor the efficiency and application of the third-party grievance mechanism. The procedures and the grievance management tool will be adjusted as required. Key monitoring measures are set out in Table 5-2 below.

Table 5-2. Key Monitoring Activities

Topic / Aspect	Monitoring Indicator	Monitoring Method	Monitoring Periodicity	Monitoring Location
Grievances/ Concerns	The Project will review Grievance Log / Database, including complaints closed and unresolved per period at a minimum monthly to include: • number of outstanding complaints and grievances opened in the month, • number of complaints and grievances opened in the month and evolution since Project start (graphic presentation), • number of complaints grievances closed in the month; and • type of grievance.	Grievance Database	Monthly	Project office
Customer Satisfaction	SAS and Customer Services will keep records written and verbal complaints raised by customers.	Customer Grievance Records and Satisfaction Surveys	Monthly	Project office
Community Engagement Activities	The SAS will record formal and informal engagement with local communities.	Community Engagement Records	Monthly	Project office
Disclosure Materials and Feedback to Communities	SAS will keep records of the types of leaflets, brochures, newsletters prepared and distributed. SAS will monitor feedback to local communities	Community Info System on the Website	Quarterly	Project office



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6 TRAININGS

All necessary training will be provided as induction training to provide general awareness for all employees of the Project and its contractors. Job-specific training for responsible personnel will be also provided as necessary including stakeholder engagement and grievance management. The implementation of this GMP will be followed by the Social Affairs Staff and other personnel and supervisors of the Project Contractors are also involved in or overseeing the stakeholder engagement activities and Grievance Mechanism Procedure.

6.1 Induction Training

The induction training will provide information about the worker grievance mechanism to all direct and indirect workers (i.e., workers of contractors and/or subcontractors). The trainings will be given in the first "Induction Training" session. All employees of the Project and contractors are required to participate in social trainings. This training will provide the information on how to understand and respect different opinions and to be an effective team member by behaving appropriately with locals and colleagues; how to raise a grievance/ suggestion or comments.

6.2 Job Specific and Other Training Requirements

Job-specific training and additional specialist training (if applicable) for key community members will then be provided to them and employees for grievance management. Special training on the implementation of Complaints Management should also be given to Social Affairs Personnel and other identified personnel.

7 AUDITING AND REPORTING

7.1 Internal and External Auditing

Routine internal inspections will be carried out by Social Affairs Staff to ensure the assessment of the social responsibility program and overall grievance management. The conformance will be monitored in accordance with the requirements set out in this Procedure. The aspects of this GMP are subject to regulatory audits. Internal annual audit will be conducted by assessing KPIs and monitoring activities defined in this GMP.

The conformance with this document will be subject to periodic assessment as part of the SANKO Textile audit program and separately by Project Lenders.



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7.2 Record Keeping and Reporting

Record keeping will be done by SAS during the following cases:

- Consultation meetings,
- Community engagement activities,
- Grievances actions and close out of grievances,
- Concerns/opinions/suggestions by the local community during consultation meetings and stakeholder engagement activities,
- Audits, investigations and incidents which will be managed according to the Project procedures.

On monthly basis, an overview of the grievances and engagement activities recorded in terms of number and type will be investigated. The situation of the grievances as open/closed out and engagement activities as completed/ongoing will be recorded periodically. The SAS will evaluate and conclude this overview with project management in the monthly management progress meetings.

APPENDICES

Appendix A: Complaint Register Form

Appendix B: Grievance Database

Appendix C: Consultation Form

Appendix D: Grievance Closure Form

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Appendix F: SANKO Textile's Codes of Ethics Procedure

Appendix G: SANKO Textile's Discrimination Procedure

Appendix H: SANKO Textile's Request and Complaint Procedure

Appendix I: SANKO Textile's Customer Complaints Procedure

Appendix J: Meeting Minutes with TEKSIF



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Appendix A: Complaint Register Form

Complaint Register Form			
Reference No:			
Full Name Note: You can remain anonymous if you prefer or request not to disclose your identity to third parties without your consent.	Irequest not to disclose my identi	ymously	
Contact Information How the complainant wants to be contacted (mail, telephone, e-mail).	By Post: Mailing address: By Telephone: By E-mail I don't want to be contacted		
Details Related to Grievance:			
Description of Incident or Grievand	Description of Incident or Grievance: What happened? Where did it happen? Who did it happen to? What is the result of the problem?		
Case summary:	Case summary:		
Date of Incident/Grievance			
☐ One-time incident/grievance (Date) ☐ Happened more than once (how many times?) ☐ On-going (Provide details)			
What would you like to see happen to resolve the problem?			
Only for internal usage: Status of complaint			
		Date:	Signature:
The complaint is closed by:			
Actions taken (Provide details):			

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Appendix B: Grievance Database

Grievance Database Reporting Period Name/Contact Grievance **Details of** Responsibility Communication Internal/ Date Communication Actions Date **Details of** Received Compliant/ (Related with **External** Received with complainant* taken Resolved Comment complainant** Complainant by Department)

^{*} Notification date and method (via call/face to face): If complainant has provided a name and contact information, he/she will be notified within 5 days that the grievance solution process has started.

^{**} Notification date and method (via call/face to face): If complainant has provided a name and contact information, he/she will be notified with related information after the grievance resolved within 30 calendar days.



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Appendix C: Consultation Form

Consultation Form			
Reference No:			
Person Filling the Form:	Date:		
Interview Agenda:	Reference No:		
Information on Consultation			
Interviewee Institution:	Communication Type		
Name-Surname of the Interviewee:	Phone/Free Line		
Phone:	Face to face interview		
Address:	Web-site/ E-Mail		
E-Mail:	Other (Explain)		
Stakeholder Type			
Public	ation NGO		
Interest Groups Industry Workers' Union Media	University		
Detailed Information on Consultation			
Questions related to Project			
Concerns/feedbacks related to Project			
Responses to the views expressed above:			



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Appendix D: Grievance Closure Form

Grievance Closure Form			
Reference No:			
Determination of Corrective Action(s)			
1			
2			
3			
4			
5			
Responsible Departments			
Close Out the Grievance	Close Out the Grievance		
This section will be filled and signed by the complainant in case the complaint stated in the "Grievance Registration Form" is resolved.			
Date:	Name Surname / Signature of the Person Closing the Complaint	Name, Surname / Signature of Complainant	



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Appendix E: SANKO Textile's Social Responsibility Policy



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seçilmesini şart koşmaktadır, tüm çalışanlarımız ve istihdam edeceğimiz çalışanlarımız için terfi, eğitim, işten ayrılma ve emeklilik için eşit haklar sunulmaktadır. Ayrıca aynı görevleri yerine getiren ve eşit beceri ve kıdem seviyesindeki tüm çalışanlar eşit şekilde ödüllendirilmektedir.

Disiplin, Taciz veya İstismar

Kuruluşumuzda açık ve değişmez bir Disiplin Talimatımız vardır. Tüm disiplin tedbirleri çalışanlara iletilmektedir. Disiplin konularında alınan kararlarda hiç kimseye ayrımcılık tanınmaz, keyfi cezalar verilmez, kötü muamele, baskı, şiddet, mobbıng v.b. yapılmaz, disiplin cezası amacıyla personel maaşından ücret kesintisi yapmaz. Aynı zamanda, fiziksel, cinsel, sözlü veya psikolojik taciz veya istismara karşı sıfır tolerans politikası izliyoruz. Taciz veya istismara yönelik bir şikâyet alınması halinde bunun soruşturmasını sağduyulu ve gizli biçimde, taciz veya istismar iddiasında bulunan şahsın etkilenmeyeceği biçimde gerçekleştiriyoruz. Bu konu ile karşılaşan bir çalışan şikayetini yazılı olarak Personel Bölümüne yapar.

Kadın Hakları

SANKO' da kadınlar, eşit menfaatler, işyerinde eşit muamele, işlerinin kalitesinin eşit biçimde değerlendirilmesi ve erkek çalışanlara açık olan pozisyonları doldurmak için eşit imkanlar dahil eşit haklara sahiptir. Annelik iznine ayrılan çalışanlar işten çıkarılmazlar. Çalışanlarımız doğum kontrolü yöntemleri kullanmaya veya gebeliklerini sonlandırmaya zorlanmaz veya bunlar için baskıya maruz bırakılmaz. Ayrıca işe alırken çalışanlarımızın gebelik testi yaptırması şart koşulmaz.

Sendika Özgürlüğü

Sendika üyeliği durumu, SANKO' da çalışmak için bir koşul değildir ve çalışanlarımızın herhangi bir sendikaya üye olma veya olmama haklarına saygı duyuyoruz. Bir toplu iş sözleşmesi bulunması halinde bu sözleşmenin yasal hükümlerine uyuyoruz.

İs Sözlesmesi

Tüm çalışanlarla iş sözleşmeleri imzalanmakta ve kendilerine bir kopya verilmektedir. İş sözleşmelerinin hüküm ve koşulları Türk iş kanunlarına ve yönetmeliklerine kesin biçimde uygundur ve maaş dahil çalışma koşullarını açık biçimde belirtirler. Maaşların her zaman vaktinde ödenmesine özen gösteriyoruz. SANKO' da fazla mesai ücretleri yasal olarak gerekli tutulan oranlarda hesaplanır ve ödenir. Sosyal güvenlik, emeklilik, sağlık, vb. kanunen ödenmesi zorunlu olan kesintiler şirketimizce ödenmektedir. Yasal olarak zorunlu olan yıllık izin, doğum izni, ölüm izni, evlenme izni gibi izinler tüm çalışanlarımıza tam olarak sağlanır. Resmî tatiller de yapılan çalışmaların karşılığı doğru biçimde tazmin edilir. İşten ayrılma halinde çalışanın kıdem tazminatı yasalara uygun biçimde ödenir.

Genel İş Yeri Sağlığı ve Güvenliği

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Çocuk İşçiliği

Kuruluşumuz Türkiye Cumhuriyeti'nde yürürlükte olan iş kanununda belirtilen asgari çalışma yaşının altındaki kişileri çalıştıramaz. Çalışanın yaşıyla ilgili olarak gerekli soruşturmaların yapılmasını ve bunun insan kaynakları birimimiz tarafından kontrol edilip kaydedilmesini sağlıyoruz. İş ortakları ve paydaşlarında da aynı hassasiyeti arar ve bu yönde teşvik eder. Çıraklık/stajyerlik uygulamaları hiçbir zaman sistematik biçimde maaş ve prim ödemelerinde kaçınmak üzere kullanılmamıştır. İşletme içerisinde farkında olmadan çoçuk işci çalıştığı tesbit edilmesi durumunda;

- Hemen fabrika dışına çıkartılır,
- En yakın hastaneye ulaştırılarak sağlık kontrolünden geçirilir,
- Emniyet birimine ve yasal vasisine haber verilir,
- Çocuk 16 yaşına ulaşana kadar yasal asgari ücret ödenir,
- 18 yaşına ulaştığında da iş güvencesi verilir.

Zorla Çalıştırma

Zorla veya irade dışı çalıştırmaya başvurmamak anayasal bir yükümlülüğümüzdür. SANKO' da tüm çalışanlarımız makul bir süre içinde bildirimini yaparak, hiçbir cezaya tabi olmadan, kendi rızalarıyla çalışmalarını sona erdirme hakkına sahiptir. Ayrıca tüm çalışanlarımız kendi takdirleriyle mesai bitiminde iş yerinden ayrılma ve fazla mesai yapmayı reddetme hakkına sahiptir.

Ücret ve Çalışma Saati

Kuruluşumuz ücret politikasını yasal şartları temel alarak, çalışanların ve ailelerinin yaşam standardını gözeterek, adil ücret haklarına saygı göstererek belirler. Ücret ve hak düzeylerini yükseltmeyi teşvik eder. İş ortaklarımız ve paydaşlarımızdan çalışanlarının ücret ve sosyal haklarının, temel ihtiyaçlarını karşılamak için gerekli olduğu bilincinde davranmalarını bekler. Kuruluşumuz çalışanlarının normal çalışma sürelerini 4857 Sayılı İş Kanunu ILO Sözleşmeleri ve Toplu sözleşme gerekliliklerini esas olarak belirler. Çalışanlara her 7 günlük dönem içerisinde en az bir defa 24 saatlik dinlenme süresi sağlanmakta, yasaya uygun olan izin, tatiller uygulanmakta ve ara dinlenme zamanlarına uyulmaktadır. Pandemi süreci nedeniyle görev tanımı uygun olan çalışanlarımız gerekli durumlarda uzaktan çalışma hakkına sahiptir. Bu süreç çalışanımızın ücretinden kesilmez.

Ayrımcılık

SANKO' da tüm çalışanlarımıza saygı ve haysiyetle yaklaşılır. Ayrımcılık kesinlikle yasaklanmıştır. Çalışanlarına din, dil, ırk, yaş, mezhep, cinsiyet, bedensel engel, cinsel tercih, uyruk, siyasi tercih, medeni durum, sosyal grup veya etnik köken hususlarında ayrım yapmadan eşit şartlarda davranılır. İşe alma politikamız çalışanların öznel veya kişisel gereksinimlerine göre değil becerilerine göre

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Sanko Hakkında

Sanko Tekstil İşletmeleri Sanayi ve Ticaret A.Ş("SANKO"),1943 yılında kurulmuştur ve pamuk ve sentetik iplik üretimi, ev tekstili, dokuma ve örme alanların da faaliyet göstermektedir. Müşterilerimizle ilişkilerimizi yalnız güven, kalite, rekabetçilik ve profesyonel yeterlilik kriterleri üzerine, adil rekabet kurallarına saygılı bir biçimde inşa ettik. Sirketimizin temel hedefleri:

- Tekstil sektörünün Türkiye ekonomisindeki lider konumunu desteklemek;
- Türkiye'de pamuklu tekstil üretiminde kalitenin, istikrarın ve güvenin sembolü olmak;
- Üretimi ve istihdamı artırarak Türk ekonomisini desteklemek;
- İhtiyaç duyabilecekleri her türlü iplik ve kumaşı, uluslararası kalite standartlarında üreterek Türk tekstil ihracatçılarını desteklemek;
- Oeko-Tex ve organik sertifikalara sahip, çevre dostu iplik ve kumaşlar üretmektir.

Giris

Doğruluk, dürüstlük ve saygı, SANKO için şirketimizin çalışmalarının tümüne yön veren temel değerlerdir. Tüm çalışmalarımızda, grup şirketlerimiz, müşterilerimiz ve toplumumuz için azami özeni gösterecek şekilde dürüst ve adaletli olmaya kendimizi adadık. Çalışanlarımıza saygıyla yaklaşıp onlara değer veriyoruz, değerlerimizi ve bağlılığımızı paylaşan şirketlerle çalışıyoruz. İş burada belirtilen ilkeler, tamamen detaylandırılmış olmamakla birlikte maaş ve çalışma saatleri, çocuk işçiliği ve zorla çalıştırma, sağlık, güvenlik ve çevrenin korunması alanlarında uymamız gereken asgari sosyal sorumlulukları ifade etmektedir. Türkiye Cumhuriyeti yasaları ve yönetmeliklerine kesin biçimde uyulmasının yanı sıra burada belirtilen ilkelerin gözetilmesine ve uygulanmasına bağlıyız. Bu bağlamda hedefimiz sektördeki en yüksek etik standartları yakalamaktadır. Aşağıdaki ilkeler SANKO 'nun gözettiği koşulları ortaya koymaktadır: Kuruluşumuz 4857 Sayılı İş kanunu, 6331 sayılı İş Sağlığı ve Güvenliği Kanunu, ILO Sözleşmelerine uymayı taahhüt eder.

İnsan Hakları

SANKO olarak "İnsanlık ailesinin bütün üyelerinde bulunan haysiyetin ve bunların eşit ve devir kabul etmez haklarının tanınması hususunun, hürriyetin, adaletin ve dünya barışının temeli" olduğunu belirten İnsan Hakları Evrensel Beyannamesini destekliyoruz. İnsan kaçakçılığına ve diğer tüm insan hakları ihlallerine karşı sıfır tolerans politikası izliyoruz. Çalışanlarımız, doğrudan veya dolaylı olarak, başka bir bireyi veya reşit olmayan kimseleri çalışmaya veya fuhuşa zorlayacak hiçbir istismar edici eylemde bulunmamıştır/bulunmayacaktır. Şirket olarak bunun bildirimini yaptık ve bu farkındalığı tüm çalışanlarımıza ilettik. İnsan Hakları bağlamında herhangi bir şikayet veya sorunun baş göstermesi halinde ,bunların çözülmesi için anında gerekli adımlar atılacaktır.

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Tüm çalışanlarımıza güvenli ve sağlıklı çalışma koşulları sunuyoruz ve yangın güvenliğini, makine ve ekipman güvenliğini, temiz suya ve uygun hijyenik tesislerine erişimi, uygun kişisel koruyucu ekipmana ve acil bakıma erişimi ve tehlikeli maddelerin uygun biçimde depolanması ve kullanılmasını sağlıyoruz. Çalışanlarımız için güvenli ve sağlıklı bir çalışma ortamı sağlamak adına ticaret sicilleri, bina kullanım izinleri, iskan izinleri, kafeteryalar için hijyen belgeleri ve makine ve ekipmanlar için gereken izinler dahil ancak bunlarla sınırlı olmamak üzere ilgili tüm yasalara ve yönetmeliklere uyuyoruz. Çalışma sahalarımızın düzgün bakımlı ve iyi havalandırılmış biçimde genel olarak temiz ve düzenli olduğundan emin oluyoruz. Çalışma sahalarında yeterli temiz içme suyu bulunmaktadır; yiyeceklerin hazırlanması ve depolanması için hijyenik tesisler sağlanması yanı sıra temiz ve düzgün biçim de stoklanmış yeterli sayıda tuvalet de çalışma sahalarında mevcuttur. SANKO' da çalışanlarımız, şirketin sağladığı konaklama imkanlarından faydalanmak ile diğer konaklama alternatifleri arasında seçim yapmakta serbesttir.

Çevre ve Sürdürülebilirlik

Gezegenimize iyi bakma, gelecek nesiller için güzelliğini, kaynaklarını ve gücünü koruma sorumluluğumuzun farkındayız. Bunun için çevresel sorumluluğumuzla ilgili olarak yüksek standartlar belirledik. Çevre politikalarımız, kirlilik denetimi, atıkların en aza indirilmesi ve kaynakların dönüştürülmesiyle olumsuz çevresel etkileri asgari düzeye indirmeyi esas alarak belirlenmiştir. Kuruluşundan bu yana SANKO, Türk çevre kanunları ve yönetmeliklerinin gerektirdiği çevresel izinlerle/lisanslarla kesin biçimde uyum içinde olmuştur. Tüm tesislerimiz, şu an da geçerli olacak şekilde gerekli bütün izinlere, lisanslara ve/veya kayıtlara sahiptir ve bunlar yasal gerekliliklere uygun olarak yenilenir. Aynı zamanda yasal zorunluluk kapsamında tesislerimiz için Çevresel Etki Değerlendirmeleri gerçekleştirilmiştir.

Özetle, aşağıdaki çevresel ilkeleri gözetiyoruz:

- İnsanlara ve çevreye zararlı maddelere ve uygulamalara olan bağımlılığın azaltılması;
- Atıkların azaltılması ve tehlikeli maddelerin zararsız biçimde ortadan kaldırılması;
- Doğal kaynakların mümkün olan en verimli biçimde kullanılması;
- Tüm karar verme aşamalarında çevresel hususların göz önünde bulundurulması;
- Sürekli gelişim için çaba gösterilmesi.

Şu anda bünyemizde katı atıkların ortadan kaldırılması ve/veya geri dönüşümü (ve bunların tesislerimizde uygulanması), atık suların denetimi ve arıtması ile hava emisyonlarının denetimi ve arıtması için yasal gereksinimlerin farkında olan çevre mühendisimiz bulunmaktadır. SANKO tesislerin de kanunen yasaklanmış veya kısıtlanmış kimyasallar kullanmıyoruz veya depolamıyoruz

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Tehlikelimaddelerveatıklarlailgiliolarakkesinprosedürlerizliyoruz.Bunlarınkarışmadanveçevreüzerind eki olası olumsuz etkileri ortaya çıkmadan depolanmalarını sağlıyoruz. Şirketimizin yakın zamanda enerji tasarrufu önlemleri aldığını ve çalışma sahalarımızda enerji tasarrufu sağlamak için yeni bir teknoloji benimsediğini de belirtmek gereklidir.

Rüşvet ve Yolsuzlukla Mücadele

Türk ceza kanunları ve yolsuzlukla mücadele kanunları dahil tüm ilgili yasalara uyum sağlamaya bağlıyız. Kamu makamlarıyla yapılan görüşmeler ve diğer tüm eylemler sırasında SANKO, doğru ve şeffaf bir tutum izler. İşletmemizde hiçbir şekilde yolsuzluk, dolandırıcılık, ayrımcılık, zimmet veya rüşvete müsamaha göstermez, oluşabilecek riskleri belirler ve önlemlerini alır.

Bu ilke kapsamında "sıfır tolerans" yaklaşımı ile hareket eder ve faaliyetlerini adil, dürüst, yasal ve etik kurallara uygun bir şekilde sürdürmeyi taahhüt eder. Periyodik(dahili ve/veya harici) değerlendirmeler/denetimler gerçekleştiriyoruz ve belirtilen politikalarımız doğrultusunda, her bir meseleyi çözmek ve iş etiğiyle ilgili sorunları gidermek üzere uygun ve önleyici adımları atıyoruz. Bu konu ile karşılaşan bir çalışan şikayetini yazılı olarak Personel Bölümüne bildirir, konu incelenir ve uygunsuz davranışların tespiti halinde gerekli yaptırımlar uygulanır.

Sorumluluk

Kuruluşumuz bünyesinde Yönetim Sistem Ekibi ve İnsan Kaynakları çalışanların sosyal haklarını, iş sağlığı ve güvenlik konularını geliştirmeye, sürdürmeye ve uygulamaya yönelik çalışmalarını yürütür. Üst yönetim bu konuda kaynak ihtiyaçlarını karşılamayı taahhüt eder ve çalışmaları teşvik eder. •SANKO Tekstil İşletmeleri A.Ş de Sosyal Sorumluluk Politikası gereği çalışanlar, taşeronlar ve tedarikçiler konu bakkında bilgi ve bilince sabip olun, gereken durumlarda doğrudan İnsan.

tedarikçiler konu hakkında bilgi ve bilince sahip olup, gereken durumlarda doğrudan İnsan Kaynakları ve/veya Yönetim Sistem Ekibi ile iletişime geçebilir çalışanlar, taşeronla ve tedarikçiler teşvik edilir ve bu hakları yönetimin taahhüdü altındadır.

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Appendix F: SANKO Textile's Codes of Ethics Procedure



ETİK KURALLAR YÖNETMELİĞİ

Doküman No	BOV-IY-001
Yayın Tadbi	1.06.2021
Row, Tax. / Rev.	1.06.2021 / 0
No	
Single No	1/8

AMAÇ

Sanko Tekstil İşletmeleri çalışanlarının görevlerini yerine getirirken uymaları gereken kuralları, ilkeleri ve çalışma ortamına ait düzenlemeleri içermekte, çalışanlara şirketin etik kurallarına uygun hareket etmeleri için yol göstererek birbirleriyle, müşterilerle, tedarikçilerle ve diğer üçüncü şahıslarla olan ilişkilerini düzenlemektedir.

2. KAPSAM

Uygulama alanı, Sanko Tekstil İşletmeleri'nde çalışan tüm teknik ve idari personeli kapsamaktadır.

3. SORUMLULAR

- ✓ Genel Müdür/Koordinatör
- ✓ Genel Müdür Yardımcısı
- ✓ Tüm Bölüm Yöneticileri
- ✓ İnsan Kaynakları

4. REFERANSLAR

- 5. KISALTMALAR
- 6. TANIMLAR

7. UYGULAMA

7.1. SANKO TEKSTİL İŞLETMELERİ İŞ ETİĞİ KURALLARI

Etik Kurallar, kurumsal aşıdan bakıldığında, temel değerlerden yola çıkarak oluşturulan görev ve prensipler uyarınca, ne şekilde davranmamız ya da karar almamız gerektiğini belirten davranış standartlarıdır. Değerler ve etik, iş hayatında kişileri yönlendirir, kurum içi ve kurum dışı iletişimi düzenler.

Bu nedenle etik kurallarımız; Sanko Tekstil İşletmeleri çalışanlarının görevlerini yerine getirirken uymaları gereken kuralları, ilkeleri ve çalışma ortamına ait düzenlemeleri içermekte, çalışanlara şirketin etik kurallarına uygun hareket etmeleri için yol göstererek birbirleriyle, müşterilerle, tedarikçilerle ve diğer üçüncü şahıslarla

HAZIRLAYAN İNSAN KAYNAKLARI YÖNETİCİSİ ONAYLAYAN INSAN KAYNAKLARI MÜDÜRÜ





January 2023



ETİK KURALLAR YÖNETMELİĞİ

Doküman No	BOM-17-001
Yagan Tarihi	1.06.2021
Row, Tot. J. Roy.	1.06.2021 / 0
Nio	
Single No	2/8

olan ilişk ilerini düzenlemektedir. İş Etiği Kuralları içerisinde geçen "Şirket", Sanko Tekstil İşletmeleri'ni ilade etmektedir.

7.2. İNSAN KAYNAKLARININ ROLÜ NEDİR?

İnsan Kaynakları, Sanko Tekstil İşletmeleri'nde etik kuralların tanımlanmasını sağlar ve buna uygun davranış yöntemlerini belirler. Bu kurallarla ilgili uygunsuz durumlarla karşılaşıklığında, alınması gereken aksiyonların takibi, İnsan Kaynakları Bölümü'nün sorumluluğundadır.

7.3. SANKO TEKSTİL İŞLETMELERİ'NDE ETİK KURALLARA UYGUN OLMAYAN BİR DURUMLA KARŞILAŞILDIĞINDA NE YAPILIR?

Etik kurallara aykın davranışlar sergileyen, şirket imkanlarını şahsi çıkarlan için kullanan, görevini ihmal eden ve/veya görevini kötüye kullanan tespit edildiğinde veya bu davranışların sergilendiğine şahit olunduğunda, pozisyon ve görevine bakmaksızın etik@sanko.com.tr adresine e-posta gönderilebilir, yine kurum içerisinde yer alan öneri kutulanna etik kural ihlaline ilişkin bilgi notlan bırakılabilir.

Gelen şikâyet ve bildirimler İnsan Kaynakları tarafından değerlendirilir.

Çalışanların bu kural ve standartlara uymayan davranışlar göstermesi veya çalışma arkadaşlarının benzer davranışlarına şahit olduğu halde, ilgili Yöneticiye veya İnsan Kaynakları yetkillerine bilgi vermemesi, başlı başına bir kural ihlali sayılacak ve bu durumun tespiti halinde İnsan Kaynakları Yönetmeliği'nde belirtildiği şekilde disiplin cezalarına konu olacağı gibi Şirket işlerinin ifasını ağır derecede engelleyici bu davranışları gördüğü halde sessiz kalınması halinde işlenen fille iştirak etmiş kabul edilir.

Sanko Tekstil İşletmeleri'nde;

- Çalışanlara dil, din, irk, yaş, cinsiyet, siyasi düşünce, ulusal aidiyet, sosyal menşei açısından ayrımcılık yapılmaz.
- Çalışanların özel yaşamına saygı gösterilir. Siyasi, felsefi, dini inançlar açısından tarafsız kalınmak suretiyle iyyerinde her türlü öğretinin telkini yasaktır.

HAZIRLAYAN İNSAN KAYNAKLARI YÖNETİCİSİ ONAYLAYAN INSAN KAYNAKLARI MÜDÜRÜ



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January 2023



FTİK KURALLAR YÖNETMELİĞİ

Doküman No	BON-17-001
Yayın Tadbi	1.06.2021
Rosy, Tiss., J. Rosy.	1.06.2021 / 6
No	
Single No.	7/8

- 7.8.4.Şirket çalışanlarının eşi, çocuğu veya birinci dereceden yakmı, üst yönetim onayından sonra işe almabilir. Bu kişiler de işe alm sürecinde, diğer adaylara uygulanan sınav, kişilik envanteri, mülakat vb. uygulamalara tabi tutulur.
- 7.8.5. Şirket çalışanlarından evli olanlar aynı birim içerisinde çalışamaz, hiyerarşik ilişkisi içinde olamaz. Aynı bölümde çalışanlar arasında evlilik kararı alınması durumunda, ilgili üst yöneticiye bilgi verilmelidir. Yönetici, İnsan Kaynakları Bölümü ile iletişime geçerek çalışanın, koşullar uygun ise, astık üstlük ilişkisi olmayan başka bir bölüme rotasyonu yapılır. Aynı şirket içerisinde rotasyon yapılması mümkün değil ise grup şirketleri içerisinde değerlendirilir veya İş Kanunu çerçevesinde yasal işlem yapılır.

7.9. İŞ SAĞLIĞI, GÜVENLİĞİ VE ÇEVRE

Şirket çalışanları, kanun, yönetmelik ve şirket kurallarınca belirlenmiş olan tüm iş güvenliği tedbirlerine ve çevreyle ilgili tüm prosedür ve talimatlara uymakla, uymayanları uyarmakla ve yetkilileri bu konuda bilgilendirmekle yükümlüdür.

Sanko Tekstil İşletmeleri'nde kullanılan malzemeleri yeniden kullanıp geri dönüştürerek, antma veya bertaraf etme gereksinimini en aza indirgemek ve doğal kaynakları korumak hedeflenir. Şirket çalışanları, ortaya çıkan atıkları, güvenli ve sorumlu bir şekilde ele alıp, bunların bertaraf edilmesi için gereken çabayı göstermelidir.

7.10. MÜŞTERİLER, TEDARİKÇİLER VE DİĞER KURUMLARLA İLİŞKİLER.

Sanko Tekstil İşletmeleri Çalışanları;

- 7.10.1. Müşterilerle, tedarikçilerle ya da diğer kurumlara yanlış, yanıltıcı ve şirketi taahhüt altına sokan bilgiler vermekten mutlak surette kaçınmalıdır.
- 7.10.2. Kendisinin, şirketin ve müşterinin itibarını korumak durumundadır.
- 7.10.3. Şirketin sunduğu tüm ürün ve hizmetlerin fiyatlandırılmasında, şirket içi düzenlemelere ve bu konuyla ilgili yasal zorunluluklara uymakla yükümlüdür.

HAZIRLAYAN İNSAN KAYNAKLARI YÖNETİCİSİ CINAYLAYAN İNSAN KAYNAKLARI MÜDÜRÜ





January 2023



ETİK KURALLAR YÖNETMELİĞİ

Doküman No	BOV-17-001
Yaşın Tadhi	1.06.2021
Rosy, Tinc. J. Rosy.	1.06.2021 / 6
No	
Single No	Dell .

- 7.10.4. Müşteriden gelen, şirketin saygınlığını ve varlıklarını etkileyebilecek derecede ciddi ve olağan dışı her türlü şikâyeti, gecikmeksizin ilgili bölüm yöneticilerine iletmelidir.
- 7.10.5. Hiçbir koşulda rakip firmalarla fiyatlama ve pazarlama politikalarını etkileyebilecek ilişkiler içinde olamaz.

7.11. İŞ ETİĞİ KURALLARININ İHLALİ

İş Etiği kurallarının ihlali durumunda; Şirket Disiplin Kurulu bir araya gelerek durumu değerlendirir gerekli yazışma ve savunmaların alınmasından sonra Disiplin kurulu görüşlerini Yönetim Kurulu'na sunar.

HAZIRLAYAN İNSAN KAYNAKLARI YÖNETİCİSİ ONAYLAYAN INSAN KAYNAKLARI MÜDÜRÜ



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January 2023

Appendix G: SANKO Textile's Discrimination Procedure



AYRIMCILIK PROSEDÜRÜ

Doküman No	IEM-PR-002
Yayın Tarihi	9.03.2020
Rev.Tar. / Rev. No	9.03.2020/0
Sayfa No	1/4

AMAÇ

Hiç kimseye, istihdam edildiği süre boyunca, işe alınma, ücret ve diğer haklar, terfi, disiplin, işten çıkarılma veya emeklilik konuları dâhil olmak üzere, cinsiyet, ırk, dil, din, yaş, bedensel engel, medeni durumu, cinsel tercih, uyruk, siyasi tercih veya sosyal grup ve etnik kökenlerine dayanılarak ayrımcılık yapılmaması için gerekli organizasyonel faaliyetlerin sağlanması ve sürdürülebilmesidir.

KAPSAM

Tüm birimleri kapsar.

3. SORUMLULAR

- ✓ İnsan Kaynaklari
- ✓ Birim amirleri

4. REFERANSLAR

✓ Sanko Tekstil İşe Giriş Evrak Listesi

5. KISALTMALAR

İK: İnsan Kaynakları

6. TANIMLAR

İnsan Kaynakları Yöneticisi: İlgili prosedürün gerekliliklerini yeri getirmek, istihdam prosedürünü, ayrımcılık prosedürünün gereklilikleri kapsamında ilerletmek.

İK: İlgili prosedürün sürdürülebilirliğini sağlamak, çalışan personellerin konu ile ilgili dilek veya şikâyetlerinin takibini ve çözümlenmesini sağlamak.

Birim amirleri: Prosedürün işletme içerisinde uygulanabilirliğini ve sürdürülebilirliğini takip etmek, prosedürün gerekliliklerinin yerine getirilmesini sağlamak.

HAZIRLAYAN İNSAN KAYNAKLARI UZMAN YARDIMCISI DNAYLAYAN İNSAN KAYNAKLARI MÜDÜRÜ





January 2023



AYRIMCILIK PROSEDÜRÜ

Dokiman No	IEW-PR-002
Yayın Tarihi	9.01.2020
Rev.Tar. / Rev. No	9.03.2020/0
Sayfa No	2/4

7. UYGULAMA

- 7.1. Hiç kimseye, istihdam edildiği süre boyunca, işe alınma, ücret ve diğer haklar, terfi, disiplin, işten çıkarılma veya emeklilik konuları dâhil olmak üzere, cinsiyet, ırk, din, yaş, bedensel engel, cinsel tercih, uyruk, siyasi tercih veya sosyal grup ve etnik kökenlerine dayanılarak ayrımcılık yapılamaz.
- 7.2. Disiplin sistemi adil ve ayrımcılığa geçit vermeyecek şekilde uygulanır.
- 7.3. SANKO TEKSTİL İŞL. A.Ş. performans değerlendirmelerine ilişkin değerlendirme adımları ve sürecini ana hatlarıyla belirten, işin derecelendirilmesiyle bağlar sunan, her türlü ayrımcılığı yasaklar.
- 7.4. Çalışan personeller ayrımcılık ile ilgili konuları dilek şikayet kutuları vasıtasıyla yazılı olarak İnsan kaynakları birimine geri bildirim olarak iletebilirler.
- 7.5. Kuruluşumuz şikayet bulunan personele karşı herhangi bir ceza, işten çıkarma vb. konularda ayrımcılık yapılmasını yasaklar.
- 7.6. SANKO TEKSTİL İŞL. A.Ş. de ayrımcılığın; terfi, rütbe indirme, görev değişikliği vb. konularda bir ceza ya da eziyet olarak kullanılmasını yasaklar.
- 7.7. İş ilanları, iş tanımları, iş performansı/değerlendirmesi, personel seçim ve işe alım prosedürleri tüm ayrımcı önyargıların dışında kalır.
- 7.8. Emsal değerde iş için işçilerin ücretlendirmesinde cinsiyet, ırk, dil, din, yaş, bedensel engel, cinsel tercih, uyruk, siyasi tercih, sosyal grup veya etnik köken üzerinden farklılık veya ayrımcılık yapılamaz.
- 7.9. SANKO TEKSTİL İŞL. A.Ş. de medeni hali esas alarak ayrımcılık yapılamaz.
- 7.10. Firma bünyesindeki sendika/çalışan temsilcilerine hiçbir konuda ayrımcılık yapılmaz.
- 7.11. İşe alım veya devam eden istihdam için hamilelik testleri veya doğum kontrol yöntemlerinin kullanımı bir koşul olarak kullanılamaz.
- 7.12. Firmamızda, ulusal yasa gereği olmadıkça, kadın işçilerden hamilelik testi yaptırmaları istenemez.

HAZIRLAYAN ONAYLAYAN İNSAN KAYNAKLARI UZMAN YARDIMCISI İNSAN KAYNAKLARI MÜDÜRÜ





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AYRIMCILIK PROSEDÜRÜ

Dokiman No	NOV-RR-089
Yayın Tarihi	9.05.3820
Res.Tar. / Bev. No.	9.05.3120./1
Sayta No	1,04

- 7.13. Çalşan bayan personeller tarafından bildirilen gebelik durumunda, gebe kişiye bundan vazgeçmesi yönünde baskı yapılamaz.
- 7.14. Personelin sağlık durumunu esas alarak, işe alma, işten çıkarma, terfi veya görev dağıtımı dahil, işin doğası gereği işçinin kendisi veya diğer işçileri korumak için tibbi gereklilik adına olan kararlar dışında, o kişinin mesleki durumunu olumsuz etkileyecek istihdam kararları ile ilgili aynımcılık yapmaz.
- 7.15. Personellerden segme veya devam eden istihdam için bir koşul olarak genel fiziksel sağlığını ölçmek için rutin tibbi muayene istenilebilir. Ancak, bu muayenelere HIV/AIDS gibi kişinin fiziksel sağlığına hemen etkietmeyen, bulaşıcı olmayan herhangi bir hastalık veya rahatsızlık için yapılacak testler muhtemel ayrımcılığa neden olduğundan istenilemez.

HAZIRLAYAN İNSAN KAYNAKLARI UZMAN YARDIMCISI ONAYLAYAN İNSAN KAYNAKLARI MÜ DÜRÜ





January 2023

Appendix H: SANKO Textile's Request and Complaint Procedure



DİLEK -ŞİKÂYET PROSEDÜRÜ

boküman Na	10M-P8-856
Yayan Tarihi	0.01.1000
Rev. Tor. / Rev. No.	8.083000 / p
Sayl's No.	1,01

1. AMAC

Çalışan personellerin, müşterilerimizin, ligili tarafların ve paydaşların, tedarileşilerin, taşeronların, alt yüklenicilerin veya dışarıdan herhangi bir kişi/kuruluşun işletmemizdeki uygunsuzluklarla ilgili yorum yapabilmeleri, tavsiyede bulunabilmeleri veya şiklayetlerini bildirilebilmeleri için gizlilik ve tarafsızlık çerşevesi içerisinde misileme yapmaksızın gerekli organizasyonel faaliyetlerin yürütülmesini sağlamak.

2. KAPSAM

Tüm birimler

3. SORUMUULAR

- Úst Yönetím
- ✓ Birim Amirleri
- ✓ İnsan Kaynakları
- ✓ İşçi Temsilcileri

4. REFERANSLAR

✓ Dilek ve Şikayet Formu.

5. KISALTMALAR

iK: İnsan Kaynakları

6. TANIMLAR

Genel Müdür: Bu prosedürün uygulanabilirliği ve sürdürülebilirliği için kaynak intiyacı sağlamak, teşvik etmek, çalışanların ve ilgili tarafların dilek/şikâyetleri doğrultusunda birimlerin hedeflerini belirlemek.

İnsan Kaynakları (İK): Dilek ve şikliyet kutularını açmak, iletişim kurmak isteyen personellerin sorunlarını dinlemek ve değerlendirmeleri EYS toplantısına taşımak, ilgili kayıtları muhafaza etmek ve geri bildirim sağlamak.

HAZIRLAYAN ONAKLAYAN İNSAN KAYNAKLARI MÜDÜRÜ İNSAN KAYNAKLARI MÜDÜRÜ



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January 2023



DİLEK -ŞİKÂYET PROSEDÜRÜ

1	Dokümas Na	104-P8-856
ı	Yayan Tarihi	9.08.3000
ı	Rev.Tor. / Rev. No.	0.003000/0
ı	Sayfa No	3,01

İşçi Temailcileri: İşçi temsilcisi odasında çalışanların dilek ve şikliyetlerini dinlemek, çözüm bulmak, İK Yöneticisi ile birlikte dilek şikayet kutularını açmak, Sosyal Performans Takımı toplantılarına mavi yakanın dilek ve şikliyetlerini taşımak, çözüm ve öneriler sunmak, sonuçlandırmak ve geri bildirim yaparak kayıt tutmak.

Dokümantasyon Sorumlusu: Dilek ve şikâyet sonrası alman aksiyonlar doğrultusunda sistemde kayıtlı bulunan İgili dokümanları gerektiğinde yenilemek.

7. UYGULAMA

7.1. İşletme İçi Uygulamalar

- 7.1.1. Kuruluşumuzda sistematik olarak ilerletilen şikâyet prosedürü ile ilgili çalışan personellere bilgilendirme eğitimi verilir.
- 7.1.2. Çalışan personeller dilek şikliyet kutuları, İK ve İşçi Temsilcileri aracılığı ile herhangi bir konudaki düşüncelerini veya şikliyetlerini dile getirebilirler.
- 7.1.3. Çalışan personellerin şikâyet mekanizmasını kullanma süreçlerinde; üzerlerinde herhangi bir baskı, şiddet, zorlama vb. eğilimlerde bulunulamaz.
- 7.1.4. Kuruluşumuz ile ilgili uygunsuzluklar, tavsiyeler, şikayetler vb. konularda, gizlilik ve tarafızılık ilkeleri bez almır.
- 7.1.5. Şikâyette bulunan personeller, ozzalandırılamaz, işten çıkarılamaz veya bu kişilere ayrımcılık yapılamaz.
- 7.1.6. İK ile yapılan sözlü/yazılı görüşmeler sonrasında ilgili kişilerin istihdam ve sosyal hakları koruma altına aktır.
- 7.1.7. Dilek ve Şikâyet kutuları/İş geliştirme ve öneri kutuları 15 günde bir kez veya Genel Müdürün talimatıyla İnsan Kaynakları yöneticisi ve sendika/işçi temsikisi tarafından açılır.
- 7.1.8. İK tarafından, kimlik belirtilen veya kimlik belirtilmeyen tüm şikâyetler değerlendirmeye alınır.
- 7.1.9. Değerlendirmeye alınan şikâyetlerle ilgili geri dönüş en geç 15 gün içerisinde ilgili kişilere veya duyuru panolarına asılarak geri bildirimi sağlanır.

HAZIRLAYAN İNSAN KAYNAKLARI UZMAN YARDINICES	ONAYLAYAN İNSAN KAYNAKLARI MÜDÜRÜ



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DİLEK -ŞİKÂYET PROSEDÜRÜ

Doküman Na	104-P8-656
Yayan Tarihi	0.01.1000
Rev. Tor. / Rev. No.	#.DE3000 / 0
Sayfa No	3,01

- 7.1.10. Değerlendirmeye alman dilek ve şikâyetler İK tarafından kayıt altına alınır.
- 7.1.11. Alman aksiyonlar ve terminler İK tarafından şikliyet eden kişi biliniyor ise kendisine bildirilir, bilinmiyor ise duyuru panosunda bilgilendirmesi yapılır.
- 7.1.12. Düzetici prosedürlerin uygulandığı şikliyetler giderildikten sonra, şikliyet eden kişi biliniyor ise kendisine bildirilir, bilinmiyor ise duyuru panosunda bilgilendirmesi yapılır.
- 7.1.13. İK tarafından aylık olarak kaç şikâyet alındığı ve kaç tanesinin çözümlendiği grafik hali'nde duyuru panosuna asılır ve şikayetlerin trend analizi yapılır.

HAZIRLAYAN İNSAN KAYNAKLARI UZMAN YARDI MICISI ONAYLAYAN İNSAN KAYNAKLARI MÜDÜRÜ





January 2023

Appendix I: SANKO Textile's Customer Complaints Procedure





MÜŞTERİ ŞİKAYETLERİ PROSEDÜRÜ

Dokiman No	KGM-PR-001
Yayın Tarihi	10.07.2020
No	10.07.2020 / 0
Sayfa No	2/3

- 7.3. İç müşteri şikayetleri tespit edilen birim amiri tarafından mail ile ilgili birimlere bildirilir.
- 7.4. İç müşteri şikayetleri ile ilgili olarak <u>şikayet</u> alan birim gerekli çalışmaları yapar. Gerekli gördüğü durumlarda mail ile cevap verir.
- 7.5. Dış müşteri şikayetleri Şanko Holding bünyesinde bulunmayan tekstil işletmeleri tarafından yapılan sikayetlerdir.
- 7.6. Dış müşteri şikayetleri için Kalite Güvence Müdürü tarafından QDMS üzerinden ilgili işletme müdürlüğüne düzeltici faaliyet başlatılır. İlgili işletme müdürlüğü düzeltici faaliyetle ilgili cevabını yazarak KGM 'ye QDMS üzerinden iletir.
- 7.7. KGM müşteri şikayetine ait tüm verileri, raporları, numune kumaşları inceler.
- 7.8. KGM tarafından pazarlama departmanına analiz sonuçları / <u>şikayet</u> cevabı iletilir.
- 7.9. Bilgi İşlem, Muhasebe, Dış Ticaret birimlerindeki müşteri şikayetleri oluşturulan proses vasıtasıyla takip edilir.

HAZIRLAYAN	ONAYLAYAN
KALİTE KONTROL UZMAN MÜHENDİSİ	KALİTE GÖVENCE MÜDÜRÜ

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January 2023

Appendix J: Meeting Minutes with TEKSIF

26.08.2022

Teksif Sendikası İşyeri Yetkilileri Arasında Yapılan Görüşme Tutanağı

İşçi Baş Temsilcisi Salih Karsız ve diğer temsilciler ile işletme genel sorunlarıyla ilgili görüşülmüş olup, aşağıdaki maddeler üzerinde çözüm sağlanmıştır.

 Vortex ve open-end çevresinde zemin aşırı derecede kaygan ve çalışan operatörün kayma riski var.

Çözüm: İş ayakkabılarının vortex ve open-end işletmesine de verilmesinin konusu paylaşıldı. Konu ile ilgili bilgi beklenmekte.

 Makinelerde yedek parça sorunu yaşıyorlar. Çok basit olan parçayı, temin etmede sorun yaşıyorlar.

Çözüm: Makine bakım birimi ile görüşüldü. Eksiklerin önceden belirlenmesi ve duruma göre hızlı aksiyon alınması gerektiği çözümüne odaklanıldı.

Sendika Baş Temsilcisi

İnsan Kaynakları Müdürü

Sosyal Uygunluk Ekjø Başkan Yrd.

lş Yeri Sendika Baş Temsilcisi Sallh KARSIZ

İnsan Kaynakları Müdürü

EZGİ BÖLER İNSAN KAYNAKLARI



Şehit Cevdet Özdemir Mah. Öveçler 4. Cad., 1351. Sok., No:1/6-7, Çankaya/ANKARA

Tel: 0.312.479 84 00 (pbx), Faks: 0.312.479 84 99

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