

# ILS Social Compliance Audit

<b>Audit Reference #:</b> (audit firm internal)	AU145158	<b>Audit ID #:</b> (Disney's ID)	NA
<b>Date Audit Started:</b> Year/Mo/Day	2020/12/21	<b>Date Audit Completed:</b> Year/Mo/Day	2020/12/21
<b>Code Conducted to:</b>	WALT DISNEY	<b>Audit Report Date:</b> Year/Mo/Day	2020/12/28
<b>Audit Type:</b> PERIODIC	Other F/U	<b>Special Program:</b> (only required if applicable to NDAs)	None

## Facility Information

<b>Facility ID No.:</b>	FAC-062831		
<b>Facility Name:</b>	DORTER MATBAACILIK SAN VE TIC AS.		
<b>Address Line 1:</b>	IKITELLI OSB HURRIYET BULVARI DEPARKO SANAYI SITESI NO: 1/26 BASAKSEHIR ISTANBUL		
<b>Address Line 2:</b>	NA		
<b>City:</b>	ISTANBUL	<b>State/Province:</b>	NA
<b>Town:</b>	BASAKSEHIR	<b>Country:</b>	TURKEY
<b>Zip Code:</b>	34490	<b>GPS Location:</b>	41.065888,28.7 81551
<b>Contact Name:</b> (First and Last)	BURAK HEPER	<b>Contact Person Title:</b>	GENERAL MANAGER
<b>Primary Email:</b>	burak@dortermatbaa. com	<b>Phone Number:</b> Country code – area code / phone number	0090 5322868708
<b>Contact Person Title:</b>	GENERAL MANAGER	<b>Fax:</b> Country code – area code / phone number	0212 6974737

## Name/Address/Ownership Updates

<b>Facility Name:</b>	NA
<b>Facility Address:</b>	NA
<b>Facility Ownership Update:</b>	NA
<b>Upcoming Relocation or Expansion:</b>	NA

## Audit Team

<b>Audit Firm:</b>	Intertek
<b>Number of Auditors:</b>	3

	<b>Name</b>	<b>APSCA Registration Number</b>	<b>APSCA Certification Number</b>
<b>Audit Team Member 1:</b>	SEDA OZTURK – LEAD AUDITOR	RA21703563	NA
<b>Audit Team Member 2:</b>	CEREN AKKURT- AUDITOR	ASCA21704506	NA
<b>Audit Team Member 3:</b>	BERK COSAR- AUDITOR	ASCA21705069	NA
<i>(Note: In FANS, please input auditor(s)' APSCA Registration Number(s) in the Cross-Reference Tab of the DDM – 1 row for each auditor)</i>			

## Audit Details & Assessment

### Facility Details

<b>Access to Facility:</b>	Accepted
<b>Access to Facility - Predetermined Comments</b>	<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Auditors attempted to conduct an audit and were denied access. <input type="checkbox"/> Other

<b>Access to Facility - Additional Comments:</b>	None		
<b>Current % Capacity Devoted to Disney:</b>	%1	<b>Past % Capacity Devoted to Disney:</b>	10
<b>Products Produced:</b>	PACKAGING (Cardboard package , labels)		
<b>Disney Products Observed:</b>	YES (Harry Potter Blas , Disney Frozen Wind , Harry Potter Team)		
<b>Production Processes:</b>	Printing, cutting, gumming, packing and shipment		
<b># Total Employees:</b>	49	<b>#Production Employees:</b>	28
<b># Buildings:</b>	1		
<b># Buildings by Purpose:</b>	<b>2.Floor:</b> Another Company <b>1. Floor:</b> Dorter Matbaa , Offices , production area, infirmary , lunch hall , WC <b>0.Entrance:</b> Dorter Matbaa warehouse , Other company warehouse, cutting <b>-1. Floor:</b> A paper company / Reba paper		
<b>Peak Production Months:</b>	<input type="checkbox"/> Unknown <input type="checkbox"/> April <input type="checkbox"/> September <input checked="" type="checkbox"/> None <input type="checkbox"/> May <input type="checkbox"/> October <input type="checkbox"/> January <input type="checkbox"/> June <input type="checkbox"/> November <input type="checkbox"/> February <input type="checkbox"/> July <input type="checkbox"/> December <input type="checkbox"/> March <input type="checkbox"/> August		
<b>Low Production Months:</b>	<input type="checkbox"/> Unknown <input type="checkbox"/> April <input type="checkbox"/> September <input checked="" type="checkbox"/> None <input type="checkbox"/> May <input type="checkbox"/> October <input type="checkbox"/> January <input type="checkbox"/> June <input type="checkbox"/> November <input type="checkbox"/> February <input type="checkbox"/> July <input type="checkbox"/> December <input type="checkbox"/> March <input type="checkbox"/> August		
<b>Facility Regular Hours:</b>	NA	<b>Facility # of Shifts/Hours</b>	<b>Administrative and production:</b> 08:30 – 18:15 (including 15’x2 tea break + 30’ lunch break)
<b>Other Brands Present?</b>	PENTI,MUJDE,KARGOSAN,HEMA		
<b>Establishment Date: Yr/Mo/Day</b>	1976/01/01		

<b>Nationality of Management:</b>	TURKISH
<b>Nationality of owner/owner entity:</b>	TURKISH

**Management Gender (enter # of people):**

	Male	Female
Managers	11	10
Supervisors	1	0

<b>Nationality of Workers:</b> (Top 5 Countries)	<b>Approx. % of Total Workforce:</b>
TURKISH	% 100
<b>List ALL other nationalities in the facility:</b>	None
<p><i>(Note: If there are North Korean workers in the facility, please additionally provide the following details in the Comments section of the Audit Report:</i></p> <ul style="list-style-type: none"> <li>• Employment dates of each North Korean worker</li> <li>• Labor agent of each North Korean worker</li> <li>• Type of work authorization/permission for each North Korean worker</li> <li>• Summary of Code category violation related to the North Korean workers (detailed info of the Code category violation related to the North Korean workers shall be reported as per the standard reporting process)</li> </ul>	

**Audit Details**

<b>Attendance Records Tested:</b>	<input type="checkbox"/> Unknown <input type="checkbox"/> April <input type="checkbox"/> September <input type="checkbox"/> None <input type="checkbox"/> May <input type="checkbox"/> October <input type="checkbox"/> January <input type="checkbox"/> June <input type="checkbox"/> November <input type="checkbox"/> February <input type="checkbox"/> July <input checked="" type="checkbox"/> December <input checked="" type="checkbox"/> March <input checked="" type="checkbox"/> August		
<b>Payroll Ledgers Tested:</b>	<input type="checkbox"/> Unknown <input type="checkbox"/> April <input type="checkbox"/> September <input type="checkbox"/> None <input type="checkbox"/> May <input type="checkbox"/> October <input type="checkbox"/> January <input type="checkbox"/> June <input type="checkbox"/> November <input type="checkbox"/> February <input type="checkbox"/> July <input checked="" type="checkbox"/> December <input checked="" type="checkbox"/> March <input checked="" type="checkbox"/> August		
<b>Last Pay Date:</b> Year/Mo/Day	2020/12/05	<b>Number of Records Sampled:</b>	30 (10 workers x 3 months)

<b># Individual Employee Interviews:</b>	10	<b># Employee Group Interviews:</b>	Because of Covid-19 epidemic issue group interview was out of scope. Only individual interviews are conducted with 10 employees.
<b>Numbers per Group:</b>	0		
<b>Additional Locations Audited?</b>	No		
<b>Explain Additional Location Details:</b>	None		
<b>Comments/Observations:</b>	None		
<b>Communicated Findings With:</b>	SULEYMAN DEMIR – SOCIAL COMPLIANCE RESPONSIBLE		
<b>Agreed to and Signed CAPAR?</b>	Yes		
<b>Audit Entered by: (Name)</b>	SEDA OZTURK		

### Comments Details

<p><b>Comments:</b> DORTER MATBAACILIK SAN VE TIC AS. It was established in 1976 and has been producing at its current address since 2016. The total closed area is about 2464 square meters. There are total 49 workers on site (All employees are local workers, all are permanent). Administration; 21 employees (10 female, 11 male), Production; 28 male employees. Fingerprint time recording system is available. Payment Day: 5th of each month via bank. The facility has benefited from short time working allowance and unpaid leaves allowance between 01.04.2020 – 06.07.2020. The facility has updated risk analysis regarding Covid-19 pandemic. Emergency action plan was updated regarding covid-19. All employees have taken training within the scope of Covid-19 pandemic. All employees wear masks. Disney audit was combined with Sedex.</p> <p><i>This audit includes elements beyond the scope of a Social Compliance Audit as defined by the APSCA Competency Framework. The association of the auditor's APSCA number with this report is limited to those elements outlined in the APSCA Competency Framework. APSCA makes no representations with respect to the auditor's competency to professionally evaluate compliance with any other audit elements"</i></p>
<b>Name and Title of Others Present (ex. translators, observers, trainees):</b> None
<b>Attendance Records Provided:</b> 12/ January 2020- December 2020
<b>Payroll Records Provided:</b> 12/ January 2020- December 2020
<b># of Records Sampled (description):</b> 10 employees' attendance records and payroll records of March 2020(random month), August 2020 (random month) and December 2020 (last paid month), were reviewed.
<b>Resources Received from Facility (i.e. transportation, meals):</b> None

**Factory Representative in opening meeting (name/title):** SULEYMAN DEMIR – SOCIAL COMPLIANCE RESPONSIBLE, BURAK HEPER – GENERAL MANAGER,

**Factory Representative in closing meeting (name/title):** SULEYMAN DEMIR – SOCIAL COMPLIANCE RESPONSIBLE, BURAK HEPER – GENERAL MANAGER

*(Note: other comments may include but not limit to: details if "Agreed to and signed CAPAR" is indicated "No"; further details regarding audit scope; special observation or comments on the audit process; reason as to why audit report is submitted late; reason as to why auditors assigned in the DDM differ from auditors at site; details of North Korean workers, etc.)*

## **Audit Violations**

<b><u>Age Requirement</u></b>	<b>Child Labor:</b> <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Needs Improvement <input type="checkbox"/> N/A <input type="checkbox"/> Unable to Verify
	<i>Predetermined Comments:</i> <input checked="" type="checkbox"/> Acceptable  Law / Code: Additional Comments: No apparent violations.
	<b>Other:</b> <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Needs Improvement <input type="checkbox"/> N/A <input type="checkbox"/> Unable to Verify  <i>Predetermined Comments:</i> <input checked="" type="checkbox"/> Acceptable  Law / Code: Additional Comments: No apparent violations.
	<b>Young Persons:</b> <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Needs Improvement <input type="checkbox"/> N/A <input type="checkbox"/> Unable to Verify  <i>Predetermined Comments:</i> <input checked="" type="checkbox"/> Acceptable  Law / Code: Additional Comments: No apparent violations.

<p><b><u>Association:</u></b></p>	<p><input checked="" type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations.</p>
<p><b><u>Coercion and Harassment:</u></b></p>	<p><b>Other:</b>  <input checked="" type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations.</p> <p><b>Physical Abuse or Sexual Harassment:</b>  <input checked="" type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations.</p>

<p><b><u>Compensation:</u></b></p>	<p><b>Minimum Wage:</b>  <input checked="" type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations.</p> <p>Remarks:  Local minimum wage standard: (wage per hour or per month):  2558,40 TL /Month (Gross), 2020,90 TL / month (Net including minimum subsistence allowance) since 1<sup>th</sup> January 2019  2943 TL/Month (Gross) 2324,71 TL/Month (Net including minimum subsistence allowance) since 1<sup>th</sup> January 2020</p> <p><b>Overtime Hours:</b>  <input checked="" type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations.</p> <p><i>Remarks:</i>  Attendance Recorded by: (automated/electronic, timecard, manual, no recording, etc.): Finger printing time recording system was available at the facility.</p> <p>Overtime hours in sample was;  1) For March 2020 (random month), the maximum weekly working hours were 46,5 hours (2 out of 10 samples). The maximum monthly overtime were 3 hours per month (2 out of 10 samples).  2) For August 2020 (random month), the maximum weekly working hours were 45,5 hours (2 out of 10 samples). The maximum monthly overtime were 2 hours per month (2 out of 10 samples).  3) For December 2020 (Last paid month), the maximum weekly working hours were 46 hours (1 out of 10 samples). The maximum monthly overtime were 2,5 hours per month (1 out of 10 samples).</p> <p><b>Overtime Wage:</b>  <input checked="" type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:</p>
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Additional Comments: No apparent violations.

*Remarks:* Overtime premium for weekdays and rest day: 150%  
Overtime premium for official holidays: 200%  
Religious holidays: 200%

**Social Benefits and Other Compensation:**

Acceptable    Needs Improvement    N/A    Unable to Verify

*Predetermined Comments:*

Acceptable

Law / Code:

Additional Comments: No apparent violations.

*Remarks:*

Regular Pay Date: 5th of each month

Wage pay in/by (cash, check, direct deposit, etc.): Bank

**Health and Safety:**

**Dormitories:**

Acceptable    Needs Improvement    N/A    Unable to Verify

*Predetermined Comments:*

N/A

Law / Code:

Additional Comments: No apparent violations.

**Fire & Emergency Safety:**

Acceptable    Needs Improvement    N/A    Unable to Verify

*Predetermined Comments:*

Acceptable

Law / Code:

Additional Comments: No apparent violations.

**Hazardous Material:**

Acceptable    Needs Improvement    N/A    Unable to Verify

*Predetermined Comments:*

Acceptable

Law / Code:

Additional Comments: No apparent violations.

**Machine & Electrical Safety:**

Acceptable    Needs Improvement    N/A    Unable to Verify

*Predetermined Comments:*

Acceptable

Law / Code:

Additional Comments: No apparent violations.

**Medical & First Aid:**

Acceptable    Needs Improvement    N/A    Unable to Verify

*Predetermined Comments:*

Acceptable

Law / Code:

Additional Comments: No apparent violations

**Other:**

Acceptable    Needs Improvement    N/A    Unable to Verify

*Predetermined Comments:*

Acceptable

Law / Code:

Additional Comments: No apparent violations

**Personal Protective Equipment (PPE):**

Acceptable    Needs Improvement    N/A    Unable to Verify

*Predetermined Comments:*

Acceptable

Law / Code:

Additional Comments: No apparent violations

**Sanitation:**

Acceptable    Needs Improvement    N/A    Unable to Verify

*Predetermined Comments:*

Acceptable

Law / Code:

Additional Comments: No apparent violations

<p><b><u>Involuntary Labor:</u></b></p>	<p><b>Mandatory Overtime:</b>  <input checked="" type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations.</p> <p><b>Other:</b>  <input checked="" type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations.</p> <p><b>Prison, Bonded, Indentured, Forced Labor:</b>  <input checked="" type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations.</p>
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<p><b><u>Monitoring and Compliance:</u></b></p>	<p><b>Ethics:</b>  <input checked="" type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations.</p> <p><b>Insufficient or Inadequate Records:</b>  <input checked="" type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations.</p> <p><b>Other:</b>  <input checked="" type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations.</p> <p><b>Transparency:</b>  <input checked="" type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations.</p>
<p><b><u>Non-Discrimination:</u></b></p>	<p><input checked="" type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations.</p>

<p><b><u>Other Laws (if applicable):</u></b></p>	<p><b>Labor Contract:</b>  <input checked="" type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations.</p> <p><b>Other:</b>  <input checked="" type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations.</p>
<p><b><u>Protection of the Environment:</u></b></p>	<p><input checked="" type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations.</p>
<p><b><u>Publication:</u></b></p>	<p><input checked="" type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> Acceptable</p> <p>Law / Code:  Additional Comments: No apparent violations.</p>
<p><b><u>Subcontracting:</u></b></p>	<p><input type="checkbox"/> Acceptable   <input type="checkbox"/> Needs Improvement   <input checked="" type="checkbox"/> N/A   <input type="checkbox"/> Unable to Verify</p> <p><i>Predetermined Comments:</i>  <input checked="" type="checkbox"/> N/A</p> <p>Law / Code:  Additional Comments: No apparent violations.</p> <p>Auditor confirmed that DORTER MATBAACILIK SAN VE TIC AS. does not subcontract or receive Disney-branded production from any facility or other sources during December 2019 to November 2020.</p>

**Appendix:  
No finding**