



FWF Guidance for Affiliates:

Risks related to Turkish garment factories employing Syrian refugees 2019

Since the Syrian Migrant crisis began, FWF has been in ongoing dialogue with stakeholders such as unions, employer associations, government representatives, UN agencies and other MSIs working in Turkey regarding best practice for brands sourcing in Turkey. FWF will periodically update this guidance as the situation evolves.

Note to FWF member brands: This guidance document is published in line with FWF's Brand Performance Check system's 'Enhanced Monitoring' policy as outlined in indicator 2.7.

This guideline has been revised and updated to help FWF members carry out thorough due diligence in their Turkey based supply chains as the Syria conflict continues to add further pressure to the Turkish apparel sector requiring deeper investigations by brands. The Syrian refugee crisis is a result of the Syrian conflict which began in March 2011. Turkey hosts approximately 4 million refugees which is the world's largest refugee population. 3,5 million Syrians are under temporary protection, and other refugees, mainly from Afghanistan, Iraq and Iran, are under international protection.

Regulations Concerning Work Permits of Foreigners under Temporary Protection entered into force on 15 January 2016. Under this law, Syrian refugees are legally able to obtain a work permit. Concerns remain, however, around the ability of Syrian Migrants to obtain these permits due to registration restrictions and complications in the application process. As a result, child labour and illegal working remain serious issues. This guidance urges member brands to develop their own policies on refugees (and immigrant workers) and to discuss them with their suppliers within Turkey for two main reasons:

1. The Syrian refugee crisis is not a temporary crisis and Syrian refugees are an integral part of the labour force in the Turkish garment-textile industry.
2. Turkey has become a country of emigration to which many immigrants and refugees migrate to earn their livelihoods. Therefore, a long-term approach should be formulated based on the unique realities of member brands and their suppliers.



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Although this guidance is meant for Syrian nationals in Turkey, there continues to be an influx of migrants and refugees from other countries to Turkey who may also need assistance. The scope of this document is for Syrian Migrant workers but many of these elements will also be relevant for other migrants. It is important for FWF members brands who source from Turkey to take this into consideration when conducting their own due diligence and to work closely with their suppliers using this guidance as a basis.

1. Risk Assessment

FWF's own investigations and consultations with stakeholders indicate that the existence of a large number of undocumented Syrian refugees present a number of risks. Even refugees under "temporary protection" continue to be vulnerable to exploitation. Brands sourcing from Turkey should be aware of these risks, and take steps to mitigate them whether working with existing suppliers or seeking new ones.

FWF does not advise brands to leave Turkey given the importance of the industry to millions of garment workers, but additional steps should be taken to ensure that the rights of Syrian refugees are respected at work. Brands should be aware of the following **risks and commonly reported problems:**

- Undocumented Syrian refugee workers have few protections and little recourse against mistreatment. The widespread failure to pay legal minimum wages (payment of as little as 50% of legal minimum has been reported), social security, and other legally-mandated benefits remains a major concern.
- The presence of hundreds of thousands of child refugees living in families with no regular source of income presents significant child labour risks. A sharp increase in child labour in Turkey has been reported by stakeholders since the arrival of the Syrian refugees.
- The highly-vulnerable status of women refugees raises the risks of gender-based violence and sexual exploitation at work. Such risks are often difficult to detect via audits, and women are often reluctant to report mistreatment. FWF members should be aware that hidden risks may exist in their supply chains. For detailed information, please check out the report of [The Turkish Medical Association](#) on war, migration and health.
- Reports indicate that a large majority of undocumented Syrian refugees do not work in the first-tier suppliers that brands contract with directly, but rather at (mostly unauthorised) subcontractors hired by first-tier suppliers. Subcontractors may be used either to cope with production peaks, for specialised production processes (e.g. embroidery or screen printing) or simply as a way to lower costs. Risks to Syrian refugees are highest at subcontractors often with dangerous and unhealthy working conditions, exploitative management and no government oversight.



- As refugees have spread out all over Turkey, brands should assume that production in all areas of Turkey is at risk of code violations related to the mistreatment of Syrian refugees. However, special attention should still be given to factories near the Syrian border.

2. Policy

2.1. FWF’s Code of Labour Practices related to these risks

A. No exploitation of child labour

In Turkey, employment of children younger than 15 years of age is prohibited¹. Workers aged 15 to 18 can be employed only in special conditions and work must not interfere with school for those pursuing secondary education (e.g. high school). In any case, juvenile workers may not work more than 40 hours per week. A copy of the personal identification card, showing a worker’s age, is among the documents which must be kept in all employees’ personnel files.

B. A legally-binding employment relationship

Workers without the legal right to work cannot enter into a legally binding employment relationship. The lack of a legal employment contract puts workers at high risk for abuse and exploitation, because they have no recourse to the law if their rights are violated and have no access to related provisions such as social security, health care etc.

C. No discrimination in employment

A number of international treaties (including International Labour Organization (ILO) Conventions 100 and 111 on discrimination and equal remuneration) as referenced in FWF’s Code of Labour Practices state that no discrimination may take place in employment on the basis of race, colour, sex, religion, political opinion, national extraction or social origin and remuneration must be equal.

The ILO Convention on Migrant Workers (ILO C143) also states that migrant workers, regardless of legal employment status, enjoy the same human rights as any other workers. This means that **it is never acceptable to offer undocumented refugee workers lower pay, unsafe conditions or to otherwise discriminate against them.**

¹ Children who are fourteen years old and have completed their primary education may be employed in ‘light work’ that will not ‘hinder their physical, mental and moral development’ According to Turkish law, the textile and garment industries DO NOT meet this requirement; therefore all textile and garment workers should be at least 15 years of age.



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D. Payment of a living wage

While FWF focuses on work towards a *living wage* over time, FWF expects immediate compliance with *legal minimum wages* for all employees, in all situations.

E. Safe and healthy working conditions

FWF has received numerous reports of serious safety violations at unauthorised subcontractors employing refugees. Basic issues, like fire safety, are often ignored.

2.2. Prevention and due diligence steps

FWF requires Member brands to take concrete steps by mapping their supply chains in Turkey and ensure that audits take place beyond the first tier².

Companies should not only monitor direct tier two production locations but also ensure they have access to tier two subcontractors as well. Alongside this process, formulating policies on the employment of Syrian refugees in Turkey is a necessary step. This policy should encourage the disclosure of unauthorised subcontractors.

Members should schedule visits to Turkish suppliers and their known subcontractors at least on an annual basis. When conducting in-person visits, brands (and/or their representatives) must notify their suppliers on their policies concerning Syrian migrants workers. They should also speak to locals (shop owners, employees of other companies) to understand if there are a significant number of Syrian refugees located in that district. This can also be detected by the prominence of signs in Arabic script which may point to a high number of Syrians in the area and therefore a higher supply chain risk (See Risk Assessment section above).

There may be a need to support factories with some financial support to cover the annual registration fee or in providing contacts to NGO's for further assistance.³ Members should seek to work collaboratively to respond to this issue by forging links with expert Turkish partners, trade unions and CSOs who can assist them in identifying further risks and providing remedy. These partners should have expertise in assisting women and children in particular.

² FWF uses an 'everything after fabric' definition to define the scope of requirements. This covers all production locations that are involved in the steps of product assembly after the production of fabric, leather, trims, or other component parts. See [Brand Performance Check Guide](#) for more details.

³ FWF has an ongoing collaboration with United Work, a Turkey based NGO that helps Syrian migrants find employment in Turkey, funded by the Dutch Government. United Work functions as a non-profit organization offering complimentary search and selection services based on job descriptions companies provide, organizing interviews, along with pre-job trainings focusing on enhancing soft skills, on improving cultural learning and on social and work life adaptation and work permit consultancy. Reimbursement of the registrations fees is now possible via the United Work.



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A list of do's and don'ts for factories, which can be used as the basis of a policy document, can be found in Appendix B. Members should state in their policies that practical support from FWF is available to their suppliers (see section F on Training).

FWF members should ensure that **all suppliers have a policy** in place for registering Syrian refugee employees, and that all Syrian workers are enrolled in the process. (See Appendix B.) Detailed information and guidelines about applying for work permits are available (in Turkish) [here](#) and [here](#). The Fair Labour Association has produced an [English version](#) of the guidelines.

3. What should members do now?

Prevention and due diligence steps

A. Registration for work permits and general risk awareness and management

FWF members should ensure that all suppliers have a policy in place for registering Syrian refugee employees, and that all Syrian workers are enrolled in the process. Bringing workers into the formal economy can significantly reduce the risks of a wide range of discriminatory and abusive situations by ensuring that their legal, worker and human rights are guaranteed. **This policy should also prevent automatic dismissal as this action could drive workers further underground.**

Under current regulations, the following points apply to the registration process:

- Applicants for work permits must first register for temporary protection identification cards.
- Work permits are valid for the same city (or in some cases province) where the identification card was issued.
- There is a six-month waiting period between receipt of the temporary protection identification card and eligibility to apply for a work permit.
- Employers must file for the permit on behalf of the employee via www.turkiye.gov.tr or www.calismaizni.gov.tr.
- An annual fee of 558 Turkish Lira/€135 per worker must be paid for registration.
- In general, the number of Syrian workers should not exceed ten percent of the number of Turkish workers in a factory.

Members should ensure that their factories are up to date with relevant local laws. They should also be prepared to have a discussion with suppliers regarding the costs associated with registering Syrian refugees to bring them into the formal labour market. There may be a need to support factories with



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some costs, such as the annual registration fee, which in some cases can be covered by United Work. Under no circumstances should the vulnerability of refugees be used to deny them their basic human rights.

FWF considers arguments like “paying refugees half the minimum wage is better than them having no income” to be unacceptable and no justification for exploitation. As a member, you should ensure that suppliers understand your expectations for treatment of workers according to the Code of Labour Practices.

FWF continues to strongly encourage members to schedule visits to Turkish suppliers and their known subcontractors at least annually. Suppliers who appear to be at particular risk of violations related to Syrian refugees – or at risk of using unauthorised subcontractors – should be scheduled for an audit. Members should also investigate whether other audits have recently been conducted, and whether they identify relevant risks. As many Syrian refugees are working in subcontractor factories, FWF encourages members to ensure they are included whenever main suppliers are audited.

When selecting new suppliers, appropriate due diligence regarding undocumented refugees and subcontractors is crucial. This is especially true for factories close to the Syrian border, where large numbers of Syrian refugees are living.

B. Child labour

As a preventive step, FWF members sourcing in Turkey should consult with their current or prospective suppliers to emphasise that employment of underage workers is in violation of the FWF Code of Labour Practices.

C. Subcontractors

FWF members should ensure that all authorised subcontractors are identified and are included in their monitoring systems. All standard FWF procedures (e.g. posting of Code of Labour Practices, option to participate in the Workplace Education Programme, etc.) also apply to subcontractors. Suppliers should clearly understand that the use of unauthorised subcontractors is not acceptable, due to the high risk of rights violations. In addition to audits, there are some ‘common sense’ steps that members can take to reduce the risk of unauthorised subcontractors. If factories provide services (e.g. embroidery, screen printing, packaging) but the equipment for those services is not on-site, then members should assume subcontractors are being used, and should ask factories to identify their locations.

D. Agents and intermediaries

Members should also ensure that any agents or intermediaries working on their behalf are aware of the risks outlined here.

E. Supplier consolidation

FWF encourages the consolidation of supplier bases. A smaller number of suppliers makes a robust monitoring system much more feasible, reduces unknown risks, especially at the ‘long end’ of a supply chain tail, and



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increases leverage at the remaining suppliers – which means members have more influence and legitimacy in discussions around improved working conditions.

F. Training, WEP and educational materials

Members should enrol suppliers in FWF’s Workplace Education Programme, which includes information for managers and workers on labour laws, including those relevant to Syrian refugees. In addition to the existing programme and materials in Turkish, FWF has established an Arabic-language version of its worker helpline. Worker information sheets in Arabic, with contact information for the helpline, should be distributed to all suppliers and subcontractors. Worker information cards in Arabic are distributed during audits and WEP trainings, and are available for members to distribute during factory visits. There is also a specific WEP training⁴ on offer focussed solely on Syrian Refugees for managers and workers.

G. Additional factors to observe:

Deductions: Ensure refugee/migrant workers receive compensation in accordance Ensure refugee/migrant workers are compensated for overtime work in compliance with overtime payment per local law; and

- a) Ensure there are no illegal deductions (directly or indirectly) from wages of refugees.
- b) Documents:
 - Ensure that refugees/ migrants (and their families) have access to their own identification documents and that these documents are not held by any other parties (directly or indirectly);
 - Review existing Human Resources procedures, particularly regarding recruitment processes, job advertisements, application forms and internal communication processes;
 - Ensure that there is a presence of a minority worker representative and/or an effective grievance mechanism.

Debts: Ensure that refugee/migrant workers (and/or their family members) are not victims of debt bondage, from the country of origin, the host country or both, either directly or indirectly (via recruitment agencies).

⁴ FWF’s Workplace Education Programme (WEP) provides short, targeted onsite training for managers, supervisors and workers. The training aims to raise awareness about **labour standards** and effective methods for communicating about problems and resolving disputes. Managers, supervisors and workers also learn about FWF’s complaints mechanism.

4. Remediation

Remediation of Code violations related to undocumented refugees is likely to be complex. Best practice recommendations continue to develop, and members are encouraged to contact FWF staff for advice on the latest developments should they need to begin a remediation process

A. General points on remediation

- Members have the responsibility to remediate unfair treatment of Syrian workers, whether found at their suppliers, or authorised or unauthorised subcontractors.
- FWF policy does not allow members to immediately terminate business relationships when problems are found. Members are expected to remain engaged with suppliers and to work to fix problems. Business relationships may be terminated only after consultation with FWF and as long as the **responsible exit strategy** is adhered to.
- Given the complexity and sensitivity of the situation, any remediation efforts with suppliers or subcontractors, should involve consultation with FWF and with legitimate local stakeholder organisations.

B. Remediation of registration, pay issues, harassment, and other forms of discrimination

- If undocumented workers are found via audits or other means, they should be enrolled in the process to obtain work permits.
- All workers should receive at least the full legal minimum wage for regular hours they have worked and the legal overtime premium for overtime hours. Under Turkish law, a normal workweek for adult employees is 45 hours; adults may work a maximum of 270 hours of overtime per year.
- For guidance on remediation strategies for sexual harassment or gender-based violence, please refer to the **FWF/ITCILO Resource Kit on Gender-Based Violence in Global Supply Chains**, and contact FWF directly.
- As the laws covering these issues are relatively new, and the situation continues to develop, FWF strongly advises members to contact FWF directly before starting on any remediation process, to discuss the most recent developments.

C. Remediation of child labour

The FWF Child Labour Policy should be implemented if child labour is found. This includes ensuring that children are removed from the workplace, enrolled in school, and that financial support is provided to the child's family until the child reaches legal working age. Please refer to the policy for details. Steps should be taken to ensure that any Syrian children involved in a remediation process are enrolled in education appropriate to their needs.



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Local, specialist advice should be sought in such cases. Members are advised to contact FWF if they have any questions regarding remediation of child labour.

D. Subcontractors

Violations of the Code of Labour Practices which are found at subcontractors must be remediated to the same standards as direct suppliers. Responsibility for the remediation should be shared between the members, the supplier, and the subcontractor.

5. Cooperation with other brands

Given the high risk levels and complexity of remediation, FWF strongly expects members to cooperate with other brands sourcing from Turkey, particularly on the prevention and remediation of issues related to Syrian refugees. FWF encourages members to openly publish or permit the sharing of their supplier data for remediation and prevention purposes via FWF.

FWF can facilitate the sharing of data with FWF members and with other organisations such as Fair Labour Association and Ethical Trading Initiative to help identify risks, share audit data, and share remediation. Such sharing can help to both increase the effectiveness of interventions, and to share the workload and costs of remediation when necessary.

6. Relevant Brand Performance Check system indicators

BPC indicators will be updated accordingly, the below items are for example purposes.

As has been the case over the past few years, FWF will continue to pay particular attention to members' human rights risk mitigation efforts in Turkey related to the following indicators from the 2016 edition of the Brand Performance Check Guide:

- 1.4 Member conducts human rights due diligence at all new suppliers before placing orders
- 1.5 Production location compliance with the Code of Labour Practices is evaluated in a systematic manner
- 1.9 Member company actively responds if production locations fail to pay legal minimum wages
- 2.5 Percentage of production volume from production locations that have been visited by the member company in the previous financial year
- 4.3 All sourcing contractors/agents are informed about FWF's Code of Labour Practices
- 5.1 Level of effort to identify all production locations



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Remediation of issues found through audits or reported to the FWF Worker Complaint Helpline will be assessed via the relevant Brand Performance Check system indicators: e.g.:

- 2.4 Degree of progress towards resolution of existing Corrective Action Plans and remediation of identified problems
- 3.4 All complaints received from factory workers are addressed in accordance with the FWF Complaints Procedure.

Member adherence to this guidance document, and overall prevention, risk-management and remediation efforts in Turkey related to Syrian refugees will be evaluated as part of indicator **2.7 Compliance with FWF risk policies.**

Appendix A

Detailed background

On 21/06/2018, **the official number** of Syrians under temporary protection in Turkey was 3.644.342 as of 07.02.2019. There are 1.658.482 Syrian Migrants in Turkey are under 18 years of age. 142, 676 Syrians are accommodated in camps. 558,437 Syrians live in Istanbul, 167.615 in Bursa and 137 000 in Izmir. In the border region, 452.534 live in Şanlıurfa, 443 000 in Hatay and 426.383 in Gaziantep. These cities are also centres for textile-garment manufacture which showcases the significance of dealing with the refugee crisis for member brands.

It is also important to remember that Syrian refugees are a heterogeneous society. Some of them are:

- **Granted Turkish citizenship**
 - Syrians with Turkish citizenship are out of the scope of this guideline. They do not need any additional measure to join the job market. However, they might share similar problems of integration in the labour market with other fellow refugees.
- **Employed legally with work permits**
 - Syrians with legal work permits are the ones that are supported by this guideline. The guidance aims to increase the number of Syrians employed with work permits.
- **Hired informally without work permits**
 - Syrians without work permits represent the overwhelming majority of Syrians working in the garment-textile industry. Some studies claim this percentage is around 98 %. It is therefore likely that undocumented Syrian refugees are working somewhere in the supply chains of many brands, particularly at unauthorised subcontractors. The work permit regulation should be applied for Syrians employed illegally.
- **Entrepreneurs/business people**
 - Syrian entrepreneurs and business people might join the supply chain of FWF member brands.
- **Students**
 - In Turkey, there are 1.1 million school-aged Syrian children and approximately 400 thousand are not enrolled in formal education. For students, there are two primary outcomes: 1. The first is about Syrian children who are working in the industry. Although over 600 thousand Syrian children are enrolled in national education, still around 400 thousand children do not have any access to formal education. If any Syrian child is found at any supplier, FWF will assist members and suppliers to enrol him/her in a formal school. 2. The second aspect is that 600 thousand Syrian children

in primary and secondary education and 20 thousand Syrian undergraduates will look for a job in the near future and they would have better language competence and occupational skills. They will still need work permits, so these relatively more skilled, and more educated Syrian labour force shall integrate to the labour market more successfully.

Detailed Legal Framework

The number of refugees, the length of their stay, now measured in years, and an ongoing shortfall in support from the international community, continue to put strain on Turkish relief systems, and poses enormous difficulties for refugees. Despite these challenges, Turkey has established a strong asylum framework through the [Law on Foreigners and International Protection and the Temporary Protection Regulation](#). Efforts continue to address the immediate humanitarian needs of refugees, and to support longer-term needs by offering health care and education, and by publishing regulations that provide a legal pathway for Syrians to gain access to the labour market.

The [Regulation on Work Permits of Foreigners under Temporary Protection](#) entered into force on 15 January 2016. Under this law, Syrian refugees are legally able to obtain a work permit, though in practice many obstacles remain in implementation of the law. The essential challenge for refugees is being trapped in the informal labour economy. Although Turkey has a considerable percentage of the informal economy (around 35%), it is easier for Turkish citizens to shift to legal employment when they counter such an opportunity. However, restrictions on the work permit make it much more difficult for refugees to find legal jobs.

At the end of 2016, 13,298 work permits were given to Syrian nationals. The corresponding figure in the first 2017 is 20,000. In April 2018, the UNDP Turkey stated at the Syria Conference in Belgium that the number of total work permits increased to 36,000. This number includes the entrepreneurs and refugees whose permits were renewed in the second year.

Additional information on obtaining work permits

Under current regulations, the following points apply to the registration process:

- Applicants for work permits must first register for temporary protection identification cards. There is a six-month waiting period between receipt of the temporary protection identification card and eligibility to apply for a work permit. However, as there has not been any massive flow of refugees in the recent years, the overwhelming majority of Syrians have their cards as they have been in Turkey for more than 6 months.
- Work permits are valid for the same city (or in some cases province) where the identification card was issued. If a Syrian find a job at a city other than the city of registration, he/she must firstly transfer



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his/her city of registration and following the approval of the transfer, he/she can obtain a work permit. This process might take weeks and even months which makes obtaining work permit very difficult.

- Employers must file for the permit on behalf of the employee via www.turkiye.gov.tr or www.calismaizni.gov.tr
- An annual fee of 283,20 Turkish Lira (€37) per worker must be paid for registration plus 89,00TL for valuable paper fee. (372,20TL in total).
- The number of Syrian workers should not exceed ten percent of the number of Turkish workers in a factory. The exemption could be applied if the state's employment agency confirms that there is no any local for the position in that city. The related article states that *"In evaluation of work permit applications, employment quota for foreigners under temporary protection may be implemented at different rates considering the placements to open jobs and jobs based on sectors and provinces depending on the number of Turkish citizens employed at the workplace."*

Detailed information and guidelines about applying for work permits are available (in Turkish) via

<https://www.csgeb.gov.tr/media/8234/yabancilarklavuz.pdf> and <https://www.csgeb.gov.tr/media/5883/gecicikoruma.pdf>.

Resources for brands sourcing from Turkey

- FWF's [Turkey Country study February 2017/18](#)
- FWF/ITC/IO Resource Kit on Gender-Based Violence in Global Supply Chains.
- [The FWF Child Labour Policy](#)
- Fair Labour Association (FLA)'s [issue brief](#) on Syrian refugees in Turkey.
- FLA's English translation of the [Work Permit Guidelines](#).
- FLA's [Report on Child Labour](#)
- ETI's www.ethicaltrade.org/resources/basic-labour-and-social-security-laws-in-turkey
- Ethical Trading Initiative's [blog posts on responses to the refugee crisis](#).



Appendix B

Sample list of do's and don'ts:

The Action Plan⁵ below was developed to provide guidance to suppliers and factories in the event that Syrian refugees are found working on site during an audit. It is not meant as an exhaustive list of actions.

DO:

1. Review and verify the authenticity of ALL employees' ID cards.
2. Collate a full list of ALL employees, detailing name, department, ID card number, date of birth, date of joining.
3. Maintain a list of all young workers (aged 15-18). Young Syrian workers must be given equal treatment to young Turkish workers.
4. Keep up to date on any changes to relevant legislation via Ministry of Labour or Directorate of Migration.
5. Support Syrian workers in official registration e.g. at local police station.
6. Ensure that Syrian workers are afforded equal treatment to other employees and are provided with at least Gross National Minimum Wage, Overtime Premium, weekly rest day, written confirmation of conditions of employment (in worker's own language).
7. Provide Health & Safety information / training in workers' own language.
8. Provide details of NGO United Work to Syrian workers
9. Document all actions taken, including wage payments and receipts.
10. Maintain copies of ID cards for ALL workers. Original documents must not be retained.

DON'T:

1. Expel any current Syrian workers from the factory.
2. Threaten the workers or their families or obstruct the progress of remediation.
3. Hire any workers who do not have correct work permits.
4. Produce any falsified records.
5. Limit access to reasonably requested documents or records.

FWF members should also request clear answers to the following questions from their suppliers:

⁵ This example was taken from Armed Angels, a FWF Member



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- Have they employed any Syrians in their supply chain? If not, is there any special reason? If yes, what have they done for the work permit?
- Does the supplier receive job applications from Syrian refugees for open positions?
- What is their approach towards Syrians who would like to work at their workplace?
- Does HR know the necessary legal framework and requirement to employ refugees? (In the seventh year, following many training activities, suppliers should be well aware of this framework.
- Do other plants in that industrial zone employ refugees? Are there many Syrians working in the town/city? What are their observations? Does the supplier receive similar demands on employment of Syrians from other customer brands.