



Milestone 1 Report

The Fair Labor Association's Agriculture Accreditation Program



March 2025

SABIRLAR FINDIK İHRACAT LTD. ŞTİ.

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MILESTONES AND ACCREDITATION FOR THE FAIR LABOR ASSOCIATION'S AGRICULTURE PROGRAM



The Fair Labor Association's (FLA) [Agriculture Program](#) represents a rigorous evaluation of a member company's human rights due diligence (HRDD) systems for compliance with [the Principles of Fair Labor and Responsible Sourcing for Agricultural Supply Chains](#) and the FLA [Workplace Code of Conduct \(CoC\) for the Agriculture Sector](#).

These standards are designed to protect workers in member companies' global supply chains and are based on international practices and norms, including guidance from the International Labour Organisation (ILO), the United Nations Guiding Principles on Business and Human Rights (UNGP), the OECD Due Diligence Guidance for Responsible Business Conduct, and the Corporate Human Rights Benchmark (CHRB). Each principle is supported by a set of benchmarks and key performance indicators (KPIs) that define what companies must do to successfully implement our standards.

Effective HRDD program implementation is a process of continuous improvement. FLA evaluates agriculture companies on the alignment of their social compliance systems with FLA standards, and the company's performance in executing those systems to support and protect workers.

Each FLA company pursuing Fair Labor Accreditation in agriculture moves through a series of milestones prior to achieving accreditation for the in-scope commodity program. Following accreditation, the in-scope commodity is on a maintenance track where FLA verifies the company's adherence to FLA accreditation standards every three years.

This Milestone 1 report recognizes a company's achievements, acknowledges areas in which the company has gone above and beyond baseline requirements, and makes specific recommendations for future growth.

MILESTONES FOR THE FLA AGRICULTURE PROGRAM

Milestone 1: Governance and Internal Alignment

Based on its commitment to human rights and a risk assessment, and in consultation with international civil society organizations (CSOs), the company has developed an HRDD system to oversee the implementation of labor standards for commodities in scope. The company has aligned its standards to FLA standards, developed a time-bound plan for achieving full supply chain traceability, and started publicly disclosing its sourcing profile for in-scope commodities.

Milestone 2: Implementation & Monitoring

The company implements FLA standards (FLA Principles and the CoC) in sourcing countries with support from its headquarters. The company has expanded its traceability efforts for in-scope commodities, in sourcing countries. With support from FLA and in consultation with local CSOs, the company has developed farm-level monitoring tools, sampling, and monitoring methodology; and initiated farm-level assessments. The company has established functioning grievance mechanisms and additional safety nets for the farmworkers.

Milestone 3: Review and Improvement

The company continues to implement FLA standards and expand traceability in high-risk sourcing countries with support from its headquarters. With support from FLA and in consultation with local CSOs, the company is implementing corrective action plans including considering gender-disaggregated data collected via monitoring mechanisms developed in Milestone 2. Each country is recognized for implementing all 10 FLA Principles. For companies sourcing from one country, their program is accredited at this stage provided they meet FLA traceability requirements.

Milestone 4: Full Implementation and Integration

The company is implementing all 10 FLA Principles pertaining to governance, monitoring, and remediation in all high-risk countries for the commodity in scope.

Milestone 5: Accreditation & Maintenance

The company has achieved FLA traceability requirements for the in-scope commodity and is implementing all FLA standards and in all the countries, including high- and low-risk countries. For low-risk countries, the company implements a subset of FLA standards. The company's global commodity program is accredited, and it moves to an ongoing maintenance phase where FLA will verify adherence to FLA standards and principles every three years.

COMPANY OVERVIEW

NAME	Sabirlar Findik İhracat Ltd. Şti. (Sabirlar)	CATEGORY	Participating Company - Agriculture Program
HEADQUARTERS (HQ) LOCATION	Trabzon, Türkiye	COMMODITY	Hazelnuts
ABOUT THE COMPANY	<p>Sabirlar is a privately held and family-owned hazelnut processing company headquartered in Trabzon, Türkiye. The company sorts, processes, and packs hazelnuts in various forms (whole, chopped, paste, meal, sliced, roasted, etc.). Sabirlar sources raw hazelnut kernels from the Black Sea region of Türkiye, especially from Giresun, Ordu, and Samsun, and processes and packs its products in Trabzon, Türkiye. The company started with a small cracking plant in 1965 and, in 1989, Sabirlar established its first integrated processing plant in Trabzon.</p> <p>Sabirlar exports to more than 40 countries, including the European Union, which is its primary market, as well as the United States, Canada, Australia, Israel, and Tunisia.</p> <p>So far, Sabirlar has published two sustainability reports and two UN Global Compact reports on its website:</p> <ul style="list-style-type: none">▪ 2022 Sustainability Report▪ 2023 Sustainability Report▪ 2021 UN Global Compact Report▪ 2022 UN Global Compact Report		
FLA MEMBERSHIP	2022	SUPPLY CHAIN OVERVIEW AND SOURCING PROFILE DISCLOSURE	<p>Sabirlar only sources hazelnut from Türkiye. In 2022, it sourced more than 5,000 tons of hazelnut from 21 districts, 20 suppliers and 4,527 farmers located in the Ordu, Giresun Sakarya, and Samsun provinces of Türkiye. The company can trace 95% of its procured hazelnuts to farms, according to its Sabirlar Sourcing Profile Disclosure (published in 2023 on its website).</p> <p>Based on the FLA Risk Assessment Tool, Ordu has been identified as the key supply base in Türkiye and farms in Ordu are covered under the FLA annual due diligence cycle.</p>
RECOGNITION	FLA Milestone 1 Report Published: March 2025		

HIGHLIGHTS OF SABIRLAR FINDIK İHRACAT LTD. ŞTİ. MILESTONE 1 RECOGNITION

Sabirlar Findik İhracat Ltd. Şti. (Sabirlar) joined FLA in February 2019. Since then, Sabirlar has continuously improved its supply chain traceability, identified farm-level non-compliances, and worked on remediation. This report details FLA's evaluation of Sabirlar's governance at the headquarters level (Milestone 1).

Highlights of Sabirlar for Milestone 1 – Governance and Alignment include:

Strong Senior Management Commitment: Sabirlar has built a sustainability program from scratch since joining FLA. The company developed its own code, fully aligned with the FLA CoC, and hired a lead to coordinate the sustainability department staff and program activities. It started to publish sustainability reports on its website as of 2022.

Supplier Engagement: Sabirlar only works with “approved suppliers” who are committed to compliance with the Sabirlar code and regularly monitors their activities, practices, and the farms they source from. In return, the company supports suppliers in different ways, such as providing consultancy on agricultural practices, organizing farmer trainings to boost quality and increase yields, and giving premiums.

Traceability and Risk Assessments: Sabirlar was one of the first member companies to disclose its sourcing profile on its website. According to its disclosure, the company achieved 95% traceability to its hazelnut farms in Türkiye as of 2022 and is committed to 100% traceability in the future.

Remediation: Sabirlar has been an active participant in FLA's [Harvesting the Future \(HTF\) project](#) since 2019. The HTF project takes a collaborative model among stakeholders, in which buyers and suppliers, CSOs, and the Turkish government are working together to create large-scale changes on child protection and responsible recruitment through a multi-commodity, multi-company, and multi-geography approach.

Stakeholder Engagement: Consultation with civil society has been the key element of Sabirlar's activities from early on. Sabirlar prioritizes eliminating child labor in its supply chain and facilitating children's access to education; to accomplish this, the company works with external experts. It has partnered with a number of CSOs since 2019 and opened summer schools in the sourcing region.

FLA DUE DILIGENCE ACTIVITIES

ACTIVITIES	PURPOSE	STATUS
Headquarters-Level Assessment	<ul style="list-style-type: none"> Verify headquarters and country-level policies and procedures. Review documentation, processes, and farm-level data demonstrating the company's compliance with the Principles of Fair Labor and Responsible Sourcing for Agriculture Supply Chains. 	<ul style="list-style-type: none"> Conducted desk-based review of all related documents. Interviewed the sustainability lead in 2023 and 2024.
Country Level Internal Management Systems (IMS) Assessment	<ul style="list-style-type: none"> Evaluate the company's internal management systems. Verify the company's timebound improvement plans. 	<ul style="list-style-type: none"> Began evaluating the company's implementation in Türkiye in 2021 (program implementation began in 2019). Confirmed its traceability improvement plan and its progress toward it over time.
Farm-Level Assessments <ul style="list-style-type: none"> Baseline Assessment Independent External Assessments (IEM) Independent External Verifications (IEV) Focused Assessment Social Impact Assessment (SIA) 	<ul style="list-style-type: none"> Identify labor violations and assess root causes. Track remediation efforts over time at the farm level. Publish the findings and the corrective action plans. 	<ul style="list-style-type: none"> Completed total number of assessments in Türkiye (2021 – 2024): 5 <ul style="list-style-type: none"> Baseline: (FLA conducted baseline one assessment prior to the company joining FLA) IEM: 3 IEV: 1 Focused: 1 (COVID-19 focus) Number of farms visited: 72 Number of workers interviewed: 501
Innovation	<ul style="list-style-type: none"> Verify the company's commitment to work in a collaborative manner to address systemic issues. Verify engagement in multi-stakeholder projects and initiatives for the commodity in scope. Verify that the company has shared best practices. 	<ul style="list-style-type: none"> Observed the company's active participation in Harvesting the Future (2019–2023), demonstrating its capacity for collaboration. Confirmed its the participation in the data collection and analysis pilot, using the Fair Compensation Tool in Türkiye.

ACTIVITIES	PURPOSE	STATUS
Training and Capacity Building	<ul style="list-style-type: none"> ▪ Verify the company's capacity building practices. ▪ Verify supplier, farmer, and worker engagement. ▪ Evaluate the effectiveness of internal and external capacity building activities. 	<ul style="list-style-type: none"> ▪ Confirmed through interviews that there is an annual training for staff on FLA standards and their commitment to labor rights. ▪ Confirmed that engagement staff possess a high level of interest and knowledge on labor rights issues.
Fair Labor Investigations	<ul style="list-style-type: none"> ▪ Verify that the company investigates suppliers for alleged non-compliances, reports its follow-up on remediation, and engages with unions. 	<ul style="list-style-type: none"> ▪ Not applicable
Stakeholder Engagement	<ul style="list-style-type: none"> ▪ Verify the company's integration of perspectives from CSOs and other relevant organizations, on the company's social compliance program. 	<ul style="list-style-type: none"> ▪ Observed the company's active participation in Harvesting the Future (2019–2023), demonstrating its ability for stakeholder engagement.
FLA Governance and Standards	<ul style="list-style-type: none"> ▪ Verify company participation in FLA activities (e.g., farm assessments and board meetings), standards-setting discussions, piloting of new tools and methodologies, and the development of innovative approaches). 	<ul style="list-style-type: none"> ▪ Observed the company's participation in the FLA Agriculture Committee and its use of the sourcing profile disclosure tool.

MILESTONE 1 ASSESSMENT SUMMARY



PRINCIPLE 1A: TOP MANAGEMENT COMMITMENT AND WORKPLACE STANDARDS

Company Member is committed to accountability and transparency through established workplace standards.






WHY: Respect for human rights and a commitment to workplace standards must be driven by a company's most senior employees. Workers' rights are more likely to be effectively integrated into all business decisions when a company's board of directors and/or top management sets clear expectations. Commitment from a company's upper management is an essential component of an effective social compliance program.

BASELINE REQUIREMENTS FOR MILESTONE 1

CHART KEY: ● Met baseline requirements ● In process of implementing baseline requirements within the disclosed timeline

DESCRIPTION AND KPI	FLA STANDARD	SABIRLAR SYSTEM & PERFORMANCE	SABIRLAR PROGRESS
Internal Commitment (1A.1a) HQ Level	The company has a demonstrated internal commitment from top management (e.g., CEO/ owner/ business unit lead), as well as resource allocation from top management, to uphold and integrate workplace labor standards into business practices and ensure that lobbying and advocacy activities align with and support the standards in the FLA Workplace Code of Conduct.	<p>As a small company, Sabirlar's owner and company staff—including the sustainability leader—have close working relationships. The owner's oversight and approval of sustainability work are visible among staff. The owner has articulated the company's commitments to labor rights through interviews with FLA.</p> <p>Along with joining FLA, Sabirlar hired a team leader and developed a code of conduct to uphold and integrate workplace labor standards into its business practices. Currently, its team consists of a sustainability and social compliance lead and three agronomists. Sabirlar shared documents with FLA identifying roles and responsibilities and a budget summary/investment plan for its 2023 activities.</p> <p>Sabirlar posted its code of conduct on the notice boards at its factory for all staff to see. Sabirlar also continues delivering yearly trainings to staff on FLA standards and the company's commitment to labor rights.</p>	●

MILESTONE 1 ASSESSMENT SUMMARY

DESCRIPTION AND KPI	FLA STANDARD	SABIRLAR SYSTEM & PERFORMANCE	SABIRLAR PROGRESS
Public Commitment (1A.1b) HQ Level	The company has demonstrated public commitment and transparency in implementing workplace labor standards.	<p><u>Sabirlar published a written commitment document</u> on its website when it joined FLA in 2019. The commitment is signed by Sabirlar's general manager (GM) and details the scope of the company's commitment to adopting and implementing a labor rights program in its supply chain.</p> <p>In its sustainability reports (the 2022 Sustainability Report, the 2023 Sustainability Report, and the 2021 UN Global Compact Report), Sabirlar publicized its commitment to ethical farming and the well-being of communities it serves, and combating child labor. Furthermore, Sabirlar is a signatory to the UN Global Compact, pledging to work on ten principles covering human rights, labor rights, environment and anti-corruption.</p>	
Engage with CSOs (1A.1c) HQ Level	The company has demonstrated commitment to engage with CSOs, which includes organizations representing workers.	Sabirlar has partnered with a number of CSOs since joining FLA, including local health and educational organizations and foundations. These partnerships usually focus on child protection, as the company prioritizes addressing the risk of child labor in its supply chain. Sabirlar shared its yearly activity reports with FLA as evidence of these partnerships.	
Governance Responsibility and Accountability (1A.1d) HQ Level	The upmost levels of the governance structure have clear roles and responsibilities for ensuring that the company is implementing and upholding workplace labor standards.	Sabirlar's sustainability and social compliance lead reports to the GM and inform him about team activities on a regular basis. The GM directly reports to the owner.	
Code of Conduct and Compliance Benchmarks (1.2 a) HQ Level	The company has written workplace labor standards.	Sabirlar shares its code of conduct with its suppliers and asks them to sign it.	
Code of Conduct and Compliance Benchmarks (1.2 b) HQ Level	The company's labor standards meet the requirements in the FLA Workplace Code of Conduct.	Sabirlar's code of conduct is aligned with the FLA CoC.	

MILESTONE 1 ASSESSMENT SUMMARY



PRINCIPLE 1B: RISK ASSESSMENT AND TRACEABILITY

Company Member uses risk assessment to prioritize its workplace labor compliance program implementation and progressively increase supply chain traceability.





WHY: A risk assessment should help guide a company’s actions in high-risk countries and an implementation plan. A plan to improve supply chain traceability overtime will help the company put a social compliance program in place.

BASELINE REQUIREMENTS FOR MILESTONE 1

CHART KEY: ● Met baseline requirements ● In process of implementing baseline requirements within the disclosed timeline

DESCRIPTION AND KPI	FLA STANDARD	SABIRLAR SYSTEM & PERFORMANCE	SABIRLAR PROGRESS
Risk Assessment (1B.1a) HQ Level	The company has evidence that it conducts risk assessments to prioritize key commodities, countries per commodity, and salient labor rights issues.	<p>Sabirlar only sources and processes hazelnuts in Türkiye, which is a high-risk country for labor issues in hazelnut production.</p> <p>FLA completed a baseline assessment by the start of Sabirlar’s membership, which identified key issues, including child labor and access to education; responsible recruitment; and inadequate living conditions of seasonal agricultural workers and their families who travel from southeast Türkiye to the Black Sea region.</p> <p>Sabirlar continues to conduct region and village-based risk assessments with the help of its custom monitoring application, SVETA, and concentrates its field-level efforts based on the results. SVETA allows the company to collect and manage social compliance data and follow changing trends over the years.</p>	●

MILESTONE 1 ASSESSMENT SUMMARY

DESCRIPTION AND KPI	FLA STANDARD	SABIRLAR SYSTEM & PERFORMANCE	SABIRLAR PROGRESS
Supply Chain Traceability (1B.2a) HQ Level	The company has evidence that establishes a progressive, timebound commitment to reach full supply chain traceability and reports on the progress.	According to the Sabirlar Sourcing Profile Disclosure published in 2023, as of 2022, the company can trace 100% of its sourced hazelnuts to Tier 1 partners and 95% of its hazelnuts to farms. According to its 2023 Sustainability Report , the company aims to achieve 100% traceability in 2025.	
Sourcing Profile Disclosure (1B.2b) HQ Level	The company has evidence that it discloses its sourcing profile publicly for in-scope commodities.	Sabirlar met the FLA Sourcing Profile Disclosure requirement in 2023. Sabirlar currently discloses the required information under Milestone 1 on its website.	
Commodity Implementation Plan (1B.3a) HQ Level	The company has evidence that it has a progressive implementation plan in accordance with risk assessments, salient labor rights issues, and evolving supply chain traceability.	Based on the analysis of social compliance data collected over a year, Sabirlar prepares an investment plan/budget for the next year's activities. It develops a "Yearly Targets" document to determine targets on labor rights issues identified in its supply chain, evolve its supply chain traceability, and track its progress. The document sets measurable targets and names the staff responsible for carrying out each activity. In its 2024 targets, Sabirlar identifies three activities under social compliance; one of them is to achieve 100% traceability.	
Resource Allocation (1B.3b) HQ Level	The company has evidence that it has allocated resources to support its workplace labor compliance program implementation.	A full-time sustainability and social compliance lead, based in the region, manages the sustainability program. There has been a dedicated annual budget for all sustainability activities since 2023.	

MILESTONE 1 ASSESSMENT SUMMARY



PRINCIPLE 2: RESPONSIBLE SOURCING AND PROCUREMENT

Company Member aligns its sourcing/procurement practices with commitment to workplace labor standards.



WHY: The sourcing practices of buyers and the sales and planning practices of suppliers affect workplace conditions and worker well-being. Without consistent and systematic attention to responsible purchasing and production practices, companies can undermine their efforts toward ethical working conditions in factories. This principle evaluates how headquarters' business practices (such as design, costing, and sourcing) are managed to support workers and address any negative impacts on working conditions.

BASLINE REQUIREMENTS FOR MILESTONE 1

CHART KEY: ● Met baseline requirements ● In process of implementing baseline requirements within the disclosed timeline


DESCRIPTION AND KPI	FLA STANDARD	SABIRLAR SYSTEM & PERFORMANCE	SABIRLAR PROGRESS
Policies and Procedures (2.1a, b) HQ Level	<p>a. The company has evidence of a written responsible sourcing/ procurement policy that considers supply chain models and characteristics, risk assessment, and traceability. The policy should include aspects such as:</p> <ul style="list-style-type: none"> ▪ Payment terms and conditions; ▪ A payment schedule; ▪ Any incentives or premiums offered; ▪ Support for farmer income and fair compensation for workers; and ▪ Engagement with business partners to understand the impact of procurement practices on farmers and workers. <p>b. The company has evidence of written procedures that stipulate implementation of the policy.</p>	<p>Sabirlar documents and verifies its supply chain, from farmers to the factory, through invoices to ensure transparency and accountability.</p> <p>The company has a purchasing policy (an annex to its code) that it shares with all suppliers, requiring them to sign it to work with Sabirlar. The policy mentions that the company forges long-term business relationships with its suppliers and expects to regularly monitor social, environmental, occupational health and safety, corruption, and transparency issues.</p> <p>While Sabirlar has records of its premium payments, the system of premium payments was not described in writing.</p> <p>Sabirlar has revised the annex to its code to explain its purchasing policy, describing how producers can qualify for the premium and how the premium payment will be provided.</p>	

MILESTONE 1 ASSESSMENT SUMMARY

DESCRIPTION AND KPI	FLA STANDARD	SABIRLAR SYSTEM & PERFORMANCE	SABIRLAR PROGRESS
Implementation (2.2a, b) HQ Level	a. The company has evidence that staff members from relevant departments are periodically trained on the b. procurement/sourcing policies and procedures. c. The company has evidence that staff upholds the responsible sourcing/procurement policies and procedures through all terms and conditions defined in its sourcing/procurement agreements.	<p>Although there is a relevant department, the GM is the main decision maker in sourcing and procurement and the one contacting and making the deals with the suppliers. The GM did not attend any training on responsible sourcing/procurement practices, but he works in tandem with the sustainability team. He factors in feedback from the sustainability department while making purchasing decisions and only works with approved suppliers.</p> <p>Sabirlar will begin documenting these processes moving forward and FLA will verify them during the M2 and M3 evaluations.¹</p>	
Accountability (2.3a, b, c) HQ / Country Level	a. The company has written records that senior management reviews and assesses the impacts of its sourcing/procurement practices and the performance of staff responsible for implementing responsible sourcing/procurement practices. b. The company has evidence that it periodically seeks feedback through dialogue with business partners, without fear of retaliation, to understand the impact (positive or negative) of its sourcing/procurement practices on farmers and workers. c. The company has evidence of improvements in its sourcing/procurement practices based on senior management review of internal, cross-discipline, and business partner dialogue and engagement; and on-the-ground impact of company practices.	<p>The company organizes yearly dinners for the suppliers and farmers. These dinners are structured as informal trainings. Sabirlar staff members visit the suppliers on a monthly basis to inform them about the company's expectations, support their activities if needed, and collect general feedback. Suppliers and farmers can use Sabirlar's website to leave their questions or share their grievances. There are no written meeting notes or feedback/grievance records to share with senior management. The GM is verbally briefed if necessary, and he is in close contact with these actors too.</p> <p>Sabirlar collected data on fair wages (in 2023 and 2024) and income (2023) using the tools developed by FLA.</p> <p>Sabirlar will begin documenting these processes moving forward and FLA will verify them during the M2 and M3 evaluations.²</p>	

- 1 This benchmark (P2.2b) requires "In Progress" as the minimum to achieve the Milestone 1. The further evidence will be verified at the country-level to confirm the "Implementation" during Milestones 2 and 3.
- 2 This benchmark (P2.3) requires "In Progress" as the minimum to achieve the Milestone 1. The further evidence will be verified at the country-level to confirm the "Implementation" during Milestones 2 and 3.

MILESTONE 1 ASSESSMENT SUMMARY

DESCRIPTION AND KPI	FLA STANDARD	SABIRLAR SYSTEM & PERFORMANCE	SABIRLAR PROGRESS
Supplier Evaluation and Incentives (2.4a, b) HQ / Country Level	<p>a. The company has evidence of a pre-sourcing and ongoing supplier evaluation system, which includes assessment of a business partner's commitment to workplace labor standards and cascading the requirements upstream.</p> <p>b. The company has evidence of steps taken to motivate its business partners to implement responsible sourcing/ procurement practices.</p>	<p>The company develops the list of approved suppliers based on the results of its pre-sourcing evaluation. Sabilar uses a set of forms for this evaluation; it has a separate form on social compliance and commitment to workplace labor standards. According to the procedure on the selection of suppliers, the social compliance section in has a weight of 20%. Sabirlar revises the list of approved suppliers on a regular basis, also considering the completed risk analysis.</p> <p>Sabirlar only sources from approved suppliers and treats them as long-term partners. However, this is not a written commitment to suppliers. The company supports approved suppliers in other ways, such as providing consultancy on agricultural practices and organizing farmer trainings to boost product quality and increase yield. Furthermore, Sabirlar gives premiums to a group of suppliers and farmers. It pays producers \$0.25 per kilogram and suppliers \$0.10 per kilogram.</p>	

MILESTONE 1 ASSESSMENT SUMMARY



PRINCIPLE 3: COMPANY STAFF TRAINING

Company identifies and trains specific staff responsible for implementing workplace standards and responsible purchasing practices and provides training to all head office and regional staff.


WHY: Effective implementation of social compliance standards depends on having staff at headquarters who are well-trained and tasked with clear responsibilities around human rights and workplace standards. Additionally, all headquarters staff must be aware of the company's commitment so that workplace standards are embedded throughout the business.

BASELINE REQUIREMENTS FOR MILESTONE 1

CHART KEY: ● Met baseline requirements ● In process of implementing baseline requirements within the disclosed timeline

DESCRIPTION AND KPI	FLA STANDARD	SABIRLAR SYSTEM & PERFORMANCE	SABIRLAR PROGRESS
Responsible Staff (3.1a, b, c) HQ and Country Level	<ul style="list-style-type: none">a. The company has an organizational chart designating title, name, and contact information of responsible individual(s).b. The company has job description(s) or other equivalent to demonstrate relevant responsibilities for implementing labor standards.c. The company has evidence of a process in place to determine the ongoing personnel needs of the labor compliance program.	<p>The sustainability and social compliance lead owns the program and reports to Sabirlar's GM on a regular basis. She devotes 100% of her time to plan and conduct approved activities. She is supported by three agronomists who visit farmers, workers, and suppliers throughout the year. They can recruit temporary social workers during the harvest season to manage the increasing workload. They collaborate with CSOs for activities requiring expertise, such as female reproductive health, or for sensitive cases, such as child labor. The company's internal job description and organizational chart describe the roles and responsibilities of relevant staff.</p> <p>The sustainability lead regularly attends FLA meetings and webinars, HTF engagements, and other webinars of relevant topics to learn and increase the team's knowledge.</p>	●

MILESTONE 1 ASSESSMENT SUMMARY

DESCRIPTION AND KPI	FLA STANDARD	SABIRLAR SYSTEM & PERFORMANCE	SABIRLAR PROGRESS
Staff Training (3.2a, b, c) HQ or Country Level	<p>a. The company has evidence that it provides appropriate training or other professional development covering all areas of the FLA Workplace Code of Conduct and Principles, the integration of standards into business practices, and awareness on the consequences of planning and sourcing/procurement practices on working conditions.</p> <p>b. The company has evidence that its training program encompasses training evaluation, feedback incorporation, and training improvements.</p> <p>c. The company has evidence that it measures awareness and knowledge gained.</p>	<p>Sabirlar sends a training needs assessment form to all staff in January each year. Based on the identified needs, the sustainability and social compliance lead conducts internal trainings or works with third-party consultants to set up external trainings. Sabirlar's team has regularly participated in the trainings delivered within the scope of HTF since 2019.</p> <p>Sabirlar shared the following documents with FLA as evidence: the sample need assessment form, the 2024 staff training plan, the sample training evaluation form, a list of external trainings received so far, the sample training attendance form, and the internal training module covering the topics detailed in the codes of conduct of Sabirlar, FLA, and other programs.</p>	

MILESTONE 1 ASSESSMENT SUMMARY



PRINCIPLE 9: CONSULTATION WITH CIVIL SOCIETY

Company Member identifies, researches, and engages with relevant labor non-governmental organizations, trade unions and other civil society institutions.

WHY: Labor-focused CSOs help companies better understand local conditions and issues that most acutely impact workers, which enables companies to make their supply chains more responsive to workers’ needs.

BASELINE REQUIREMENTS FOR MILESTONE 1

CHART KEY: ● Met baseline requirements ● In process of implementing baseline requirements within the disclosed timeline

DESCRIPTION AND KPI	FLA STANDARD	SABIRLAR SYSTEM & PERFORMANCE	SABIRLAR PROGRESS
CSO Engagement Strategy and Mapping (9.1a)	The company has a map of stakeholders and a strategic plan for local and international CSO outreach engagement, taking into account the high-risk areas and salient human rights issues. This includes trade unions active in the supply chains (at the farm level) where the company operates.	<p>Sabirlar shared a completed stakeholder mapping exercise with FLA as evidence. It has collaborated with a number of CSOs, including:</p> <ul style="list-style-type: none">▪ A Turkish educational foundation, which operated summer schools for the children of seasonal migrant agricultural families to prevent and remediate child labor cases during the hazelnut harvest in 2021 and 2022;▪ A local health-related foundation, which delivered awareness sessions on reproductive health for women in seasonal migrant agricultural groups in 2024; and▪ A local nongovernmental organization, which mapped labor contractors operating in Sabirlar’s supply chain to improve responsible recruitment practices between 2019-2020. <p>In addition, the company has collaborated with the district directorate of the Turkish Ministry of National Education to run summer school operations in 2023 and 2024.</p> <p>Sabirlar participates in FLA’s HTF project that works with several CSOs and national governmental agencies in Türkiye.</p>	●

MILESTONE 1 ASSESSMENT SUMMARY



PRINCIPLE 10: VERIFICATION REQUIREMENTS FOR FLA MEMBERSHIP

Company Member meets FLA verification and program requirements.

WHY: FLA requires that companies maintain SOPs related to FLA membership to ensure that they are upholding FLA requirements regardless of employee turnover, changes in ownership, changes in supply chain, etc. FLA’s Agriculture Program Milestone 1 requirements state that companies must have their SOPs in place before achieving Fair Labor Accreditation.

BASELINE REQUIREMENTS FOR MILESTONE 1

CHART KEY: ● Met baseline requirements ● In process of implementing baseline requirements within the disclosed timeline

DESCRIPTION AND KPI	FLA STANDARD	SABIRLAR SYSTEM & PERFORMANCE	SABIRLAR PROGRESS
FLA Membership (10.2.a, 10.3.a, 10.4.a, and 10.6.a)	<p>a. The company participates in FLA due diligence activities, including assessments at facilities and company headquarters, as applicable.</p> <p>b. The company completes a standardized annual report on its fulfillment of the Principles of Fair Labor and Responsible Sourcing; the company provides information regarding its internal management systems tools, protocols, and other documents required for verification.</p> <p>c. The company maintains a complete and accurate profile and list of facilities with FLA and publicly; the company has updated this profile within the last year.</p> <p>d. The company pays annual FLA dues and applicable fees on schedule.</p>	<p>Sabirlar has been actively participating in FLA farm assessments, sharing its supply chain data, and providing FLA accredited assessors with access to farms. It regularly pays its membership and assessment fees.</p>	●