



Sedex Members Ethical Trade Audit Report

Version 6.1



| Audit Details | | | | |
|---|--|---|--|--|
| Sedex Company Reference: <i>(only available on Sedex System)</i> | ZC: 5000001273 | Sedex Site Reference: <i>(only available on Sedex System)</i> | ZS: 1000001348 | |
| Business name (Company name): | Eden For Export | | | |
| Site name: | Eden For Export | | | |
| Site address: <i>(Please include full address)</i> | Cairo Alexandria Desert Road, Beheira, Egypt | Country: | Egypt | |
| Site contact and job title: | Ahmed Helmy - Quality Manager | | | |
| Site phone: | +201009892092 | Site e-mail: | a.helmi@eden.com.eg | |
| SMETA Audit Pillars: | <input checked="" type="checkbox"/> Labour Standards | <input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar) | <input type="checkbox"/> Environment 4-pillar | <input type="checkbox"/> Business Ethics |
| Date of Audit: | 02/05/2023 | | | |

| | |
|--|--|
| Audit Company Name & Logo:  | Report Owner (payer): <i>(If paid for by the customer of the site please remove for Sedex upload)</i> Eden For Export |
|--|--|

| Audit Conducted By | | | | | |
|-------------------------|-------------------------------------|--|--------------------------|-------------|--------------------------|
| Affiliate Audit Company | <input checked="" type="checkbox"/> | Purchaser | <input type="checkbox"/> | Retailer | <input type="checkbox"/> |
| Brand owner | <input type="checkbox"/> | NGO | <input type="checkbox"/> | Trade Union | <input type="checkbox"/> |
| Multi-stakeholder | <input type="checkbox"/> | Combined Audit (select all that apply) | | | |

If you have any concerns or queries about this SMETA report or the associated SMETA audit, please contact grievance@sedex.com.

To confirm the validity of this report, please visit <https://www.sedex.com/audit-verifier/>

Audit Content:

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

(2) The audit scope was against the following reference documents

2-Pillar SMETA Audit

- ETI Base Code
- SMETA Additions
 - Universal rights covering UNGP
 - Management systems and code implementation,
 - Responsible Recruitment
 - Entitlement to Work & Immigration,
 - Sub-Contracting and Home working,

4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)

(3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.

(4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

SMETA Declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Best Practice Guidance and SMETA Measurement Criteria.

- (1) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (2) Any Non-Compliance against customer code alone shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

Any exceptions to this must be recorded here (e.g. different sample size): None

Auditor Team (s) (please list all including all interviewers):

Lead auditor: Ali Ibrahim APSCA number: 21705282

Lead auditor APSCA status: R/A

Team auditor: Ali Ibrahim APSCA number: 21705282

Interviewers: Ali Ibrahim APSCA number: 21705282

Report writer: Ali Ibrahim

Report reviewer: Claudia Machado

Date of declaration: 02/05/2023

Note: The focus of this ethical audit is on the ETI Base Code and local law. The additional elements will not be audited in such depth or scope, but the audit process will still highlight any specific issues.

This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information be gathered and considered from records review, worker interviews, management interviews and visual observation. More information is gathered during the social audit process than is provided here. The audit process is a sampling exercise only and does not guarantee that the audited site prior, during or post-audit, are in full compliance with the Code being audited against. The provisions of this Code constitute minimum and not maximum standards and this Code should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable laws and where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection. The ownership of this report remains with the party who has paid for the audit. Release permission must be provided by the owner prior to release to any third parties.

Summary of Findings

| Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i> | Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i> | | | | Record the number of issues by line*: | | | Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i> |
|---|--|-------------------------------------|--------------------------|--------------------------|---------------------------------------|-----|----|--|
| | ETI Base Code | Local Law | Additional Elements | Customer Code | NC | Obs | GE | |
| 0A Universal Rights covering UNGP | | | <input type="checkbox"/> | <input type="checkbox"/> | | | | <ul style="list-style-type: none"> None |
| 0B Management systems and code implementation | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | | <ul style="list-style-type: none"> None |
| 1. Freely chosen Employment | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | | | | <ul style="list-style-type: none"> None |
| 2. Freedom of Association | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | | | | <ul style="list-style-type: none"> None |
| 3. Safety and Hygienic Conditions | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | <input type="checkbox"/> | 4 | | | <ul style="list-style-type: none"> It was evident during passing by the fertilizer preparation area that there were no identification signs and occupational health and safety instructions. It was evident during passing by the irrigation water storage tank that there were no warning signs or images on it. It was evident during passing by the electrical room that it was open during working hours and there were no warning signs. |
| 4. Child Labour | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | | | | <ul style="list-style-type: none"> None |

| | | | | | | | | | |
|------|--|--------------------------|--------------------------|--------------------------|--------------------------|--|--|--|--------|
| 5 | <u>Living Wages and Benefits</u> | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | | | | • None |
| 6 | <u>Working Hours</u> | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | | | | • None |
| 7 | <u>Discrimination</u> | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | | | | • None |
| 8 | <u>Regular Employment</u> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | | • None |
| 8A | <u>Sub-Contracting and Homeworking</u> | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | | • None |
| 9 | <u>Harsh or Inhumane Treatment</u> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | | • None |
| 10A | <u>Entitlement to Work</u> | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | | • None |
| 10B2 | <u>Environment 2-Pillar</u> | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | | • None |
| 10B4 | <u>Environment 4-Pillar</u> | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | | • None |
| 10C | <u>Business Ethics</u> | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | | • None |

General observations and summary of the site:

Eden For Export is a grape farm located in Cairo Alexandria Desert Road, Beheira, Egypt. The farm has a total area of 44 acres and a production capacity of 550 tons per season. The peak season for grape production is from May to August.

The farm has a workforce of 21 people, including 6 permanent employees and 15 temporary employees. The permanent employees are all male, while the temporary employees are a mix of male and female.

The farm has a number of facilities, including 4 bathrooms, 5 fire extinguishers, 4 first aid kits, 2 first aid boxes, 1 assembly point, a fertilization irrigation station, a fertilizer preparation room, an office, accommodation for 5 people, a security room, and a protective changing room. The farm also has 2 agricultural tractors and 1 automizer.

The nearest hospital is Nubarria Hospital, which is located 10 km from the farm. The nearest civil protection point is Nubarria fire brigade, which is also located 10 km from the farm.

Wages

The minimum wage at the farm is 3600 Egyptian pounds. The highest salary for workers is 6240 Egyptian pounds.

Certifications

Eden For Export is certified by GLOBALG.A.P. and GRASP.

Summary

Eden For Export is a grape farm that is committed to responsible business practices. The farm has a number of facilities and certifications that demonstrate its commitment to worker safety, environmental sustainability, and ethical sourcing.

Non-conformities

The following are the non-conformities identified during the audit:

There were no identification signs and occupational health and safety instructions in the fertilizer preparation area.

There were no warning signs or images on the irrigation water storage tank.

The electrical room was open during working hours and there were no warning signs.

Recommendations

The following are the recommendations for Eden For Export:

The farm should ensure that all workers are aware of the policies and procedures that are in place to protect them.

The farm should conduct regular audits to ensure that its environmental management systems are being followed.

The farm should ensure that all workers are being paid the minimum wage.

The farm should install identification signs and occupational health and safety instructions in the fertilizer preparation area.

The farm should install warning signs and images on the irrigation water storage tank.

The farm should close the electrical room during working hours and install warning signs.

**Please note the table above records the total number of Non-compliances (NC), Observations (Obs) and Good Examples (GE). This gives the reviewer an indication of problem areas but does not detail severities of each issue – Reviewers need to check audit results by clause.*

Site Details

| Site Details | | |
|---|---|---|
| A: Company Name: | Eden For Export | |
| B: Site name: | Eden For Export | |
| C: GPS location: (If available) | GPS Address: Cairo Alexandria Desert Road, Beheira, Egypt | Latitude: 30°10'46.9"E Longitude: 30°34'41.3"N |
| D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections | Commercial record No: 19901 Tax card No: 677-622-414 Issue 2/3/2022 expire 1/3/2027 | |
| E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc | Farming activities of grapes | |
| F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings) | <p>Eden For Export is a grape farm located in Cairo Alexandria Desert Road, Beheira, Egypt. The farm has a total area of 44 acres and a production capacity of 550 tons per season. The peak season for grape production is from May to August. The farm has a workforce of 21 people, including 6 permanent employees and 15 temporary employees. The permanent employees are all male, while the temporary employees are a mix of male and female.</p> <p>The farm has a number of facilities, including 4 bathrooms, 5 fire extinguishers, 4 first aid kits, 2 first aid boxes, 1 assembly point, a fertilization irrigation station, a fertilizer preparation room, an office, accommodation for 5 people, a security room, and a protective changing room. The farm also has 2 agricultural tractors and 1 automizer.</p> <p>The nearest hospital is Nubaria Hospital, which is located 10 km from the farm. The nearest civil protection point is Nubaria fire brigade, which is also located 10 km from the farm.</p> <p>Wages The minimum wage at the farm is 3600 Egyptian pounds. The highest salary for workers is 6240 Egyptian pounds.</p> <p>Certifications Eden For Export is certified by GLOBALG.A.P. and GRASP.</p> <p>Summary Eden For Export is a grape farm that is committed to responsible business practices. The farm has a number of facilities and certifications that demonstrate its commitment to worker safety, environmental sustainability, and ethical sourcing.</p> <p>For below, please add any extra rows if appropriate. F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> | |

| | |
|---|---|
| | <p>F2: Please give details: It was evident during the facility walkthrough that there is no visible structural issue or cracks.</p> <p>F3: Does the site have a structural engineer evaluation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>F4: Please give details: It was evident during the facility walkthrough that there is no visible structural engineer evaluation.</p> |
| <p>G: Site function:</p> | <input type="checkbox"/> Agent <input type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input checked="" type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor |
| <p>H: Month(s) of peak season: (if applicable)</p> | <p>May to August</p> |
| <p>I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)</p> | <p>Farming activities of grapes</p> |
| <p>J: What form of worker representation / union is there on site?</p> | <input type="checkbox"/> Union (name) <input type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (specify) Workers Rep. <input type="checkbox"/> None |
| <p>K: Is there any night production work at the site?</p> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <p>L: Are there any on site provided worker accommodation buildings e.g. dormitories</p> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>L1: If yes, approx. % of workers in on site accommodation 24%</p> |
| <p>M: Are there any off site provided worker accommodation buildings</p> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>M1: If yes, approx. % of workers</p> |
| <p>N: Were all site-provided accommodation buildings included in this audit</p> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>N1: If no, please give details</p> |

| Audit Parameters | | | |
|--|---|---|---|
| A: Time in and time out | A1: Day 1 Time in: 09:00 A2: Day 1 Time out: 18:00 | A3: Day 2 Time in: N/A A4: Day 2 Time out: N/A | A5: Day 3 Time in: N/A A6: Day 3 Time out: N/A |
| B: Number of auditor days used: | 1 Auditor * 1 Man-day | | |
| C: Audit type: | <input checked="" type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define | | |
| D: Was the audit announced? | <input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail: weeks <input type="checkbox"/> Unannounced | | |
| E: Was the Sedex SAQ available for review? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: If No, why not? | | |
| F: Any conflicting information SAQ/Pre-Audit Info to Audit findings? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause | | |
| G: Who signed and agreed CAPR (Name and job title) | Ahmed Helmy - Quality Manager | | |
| H: Is further information available (If yes, please contact audit company for details) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | |
| I: Previous audit date: | None | | |
| J: Previous audit type: | None | | |
| K: Were any previous audits reviewed for this audit | <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A | | |

| Audit attendance | Management | Worker Representatives | |
|------------------------------------|---|---|---|
| | Senior management | Worker Committee representatives | Union representatives |
| A: Present at the opening meeting? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

| | | | |
|--|---|---|---|
| B: Present at the audit? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| C: Present at the closing meeting? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i> | The worker Representative is Ahmed Ibrahim | | |
| E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i> | N/A, there is no union representatives in the facility as this is not Obligatory / requirement under local law. | | |

Worker Analysis

The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity.

| Worker Analysis | | | | | | | | |
|--|-----------|-----------|--------|-----------|-----------|--------|--------------|-------|
| | Local | | | Migrant* | | | Home workers | Total |
| | Permanent | Temporary | Agency | Permanent | Temporary | Agency | | |
| Worker numbers – Male | 6 | 15 | 0 | 0 | 0 | 0 | 0 | 21 |
| Worker numbers – female | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| Total | 6 | 15 | 0 | 0 | 0 | 0 | 0 | 21 |
| Number of Workers interviewed – male | 4 | 6 | 0 | 0 | 0 | 0 | 0 | 10 |
| Number of Workers interviewed – female | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total – interviewed sample size | 4 | 6 | 0 | 0 | 0 | 0 | 0 | 10 |

| | | |
|--|--|--|
| A: Nationality of Management | Egyptians | |
| <p>B: Please list the nationalities of all workers, with the three most common nationalities listed first.</p> <p><i>Please add more nationalities as applicable to site. Add more rows if required.</i></p> | <p>Nationalities:</p> <p>B1: Nationality 1: Egyptians</p> <p>B2: Nationality 2: _____</p> <p>B3: Nationality 3: _____</p> | <p>Was the list completed during peak season?</p> <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods:</p> |
| C: Please provide more information for the three most common nationalities. | <p>C: approx 100 % total workforce: Nationality 1 Egyptians</p> <p>C1: approx % total workforce: Nationality 2 _____</p> <p>C2: approx % total workforce: Nationality 3 _____</p> | |
| D: Worker remuneration (management information) | <p>D: _____% workers on piece rate</p> <p>D1: _____% hourly paid workers</p> <p>D2: 100% salaried workers</p> <p>Payment cycle:</p> <p>D3: _____% daily paid</p> <p>D4: _____% weekly paid</p> <p>D5: 100% monthly paid</p> <p>D6: _____% other</p> <p>D7: If other, please give details</p> | |

| Worker Interview Summary | |
|--|--|
| A: Were workers aware of the audit? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| B: Were workers aware of the code? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i> | 1 group of 4 |
| D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i> | D1: Male: 6 D2: Female: 0 |
| E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details |
| F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| G: In general, what was the attitude of the workers towards their workplace? | <input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent |
| H: What was the most common worker complaint? | There were no complaints raised by the interviewed workers. The workers' interviews showed that, workers have positive attitude towards the company, confirmed good working conditions, and stated that salaries are paid on time. |
| I: What did the workers like the most about working at this site? | The thing which the workers like most is that they are covered under social security. Free meals, Free transportation and medical care are provided for all workers. |
| J: Any additional comment(s) regarding interviews: | The interviews were conducted in the private room. The workers were free to speak with the lead auditor and they seemed not to be coached by management. |
| K: Attitude of workers to hours worked: | All workers are satisfied towards the working hours as well as to the overtime hours. |

L. Is there any worker survey information available?

Yes

No

L1: If yes, please give details:

M: Attitude of workers:

(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk

There were no complaints raised by the interviewed workers. The workers' interviews showed that, workers have positive attitude towards the facility, confirmed good working conditions, and stated that salaries are paid on time.

N: Attitude of worker's committee/union reps:

(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk

N/A, there is no workers committee/ union representative in the facility.

O: Attitude of managers:

(Include attitude to audit, and audit process. Both positive and negative information should be included)

The facility management was found to be cooperative throughout the audit and had a positive attitude towards the auditors' team.

Audit Results by Clause

0A: Universal Rights covering UNGP

[\(Click here to return to summary of findings\)](#)

0.A. Guidance for Observations

0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.

0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights

0.A.3 Businesses shall identify their stakeholders and salient issues.

0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.

0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.

0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.

Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- The facilities have implemented and maintained a system compliant with the ETI Base Code requirements and this system was reviewed during the audit.
- Human rights procedure dated 01/07/2022 and policy dated 01/07/2022 which cover human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.
- The company designated Mohamed Nawar / HR Manager as responsible for implementing the standards concerning Human

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

- Human rights procedure dated 01/07/2022 and policy dated 01/07/2022 were reviewed.
- Company communicated the policy with their suppliers through sending them the related policies and contracts as per legal requirements as well as through verbal communication over the phone.
- Company communicates the human rights policy with the workers inside the workplace through verbal communication.
- Mohamed Nawar / HR Manager is responsible to monitor, deploy and communicates the human rights (internal policies and legal requirement) in the facilities.

A: Policy statement that expresses commitment to respect human rights?

- Yes
 No

A1: Please give details: The company is committed to respect the human rights as it has a policy issue

| | |
|---|---|
| | 01/07/2022, covered all the human rights impacts and issues. |
| B: Does the business have a designated person responsible for implementing standards concerning Human Rights? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Mohamed Nawar Job title: HR Manager |
| C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: The company has a transparent system in place for the confidentiality reporting and dealing with the human rights impacts and issues without any fear of reprisals. The company has grievance mechanism which allows the workers to use the grievance box freely to communicate with them for any complaints, in order to report any situation or case related to human rights (working conditions). |
| D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement) | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details As mentioned in the Q. C. |
| E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The company has a policy issue, stated that all the workers' information is kept in their personnel files and this information is confidential |

| | |
|--|---|
| Findings: None | |
| Finding: Observation <input type="checkbox"/> Company NC <input type="checkbox"/> Description of observation: Nil Local law or ETI/Additional elements / customer specific requirement: Nil Comments: Nil | Objective evidence observed: Nil |

| | |
|---------------------------------------|---|
| Good examples observed: None | |
| Description of Good Example (GE): Nil | Objective Evidence Observed: Nil |

Measuring Workplace Impact

| Workplace Impact | | |
|--|--|------------------------------------|
| A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover) | A1: Last year: 2022 0 % | A2: This year: 2023 _____% 0 |
| B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2] | 0 | |
| C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year | C1: Last year: 2022 0 % | C2: This year 2023 0 % |
| D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month | 0 | |
| E: Are accidents recorded? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Accidents and injury record updated on 01/07/2022 was reviewed and it was the formal one which is delivered to the legal social insurance office, which is mentioning that there are no injuries in the firm. As per the Egyptian Labour law article# 228 that all industrial establishment employing fifteen workers or more, and all non-industrial establishment employing fifty workers or more shall provide the concerned manpower directorate with a semi-annual statistical statement on the diseases and injuries, during the first half of the months of July and January at most. | |
| F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers] | F1: Last year: 2022 Number: 0 | F2: This year: 2023 Number: 0 |
| G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers] | 0 | |
| H: Lost day work cases per 100 workers: | H1: Last year: 2022 | H2: This year: 2023 |

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| [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers] | | |
| I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months: | I1: 6 months 0% workers | I2: 12 months 0% workers |
| J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months: | J1: 6 months 0% workers | J2: 12 months 0% workers |

0B: Management system and Code Implementation
[\(Click here to return to summary of findings\)](#)

0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.
 0.B.2 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with
 0.B.3 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.
 0.B.4 Suppliers are expected to communicate this Code to all employees.
 0.B.5 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- company has implemented and maintained system to be complied with ETI Base Code requirements and this system was reviewed during the audit.
- company has written policies and procedures related to legal requirements and ETI Base Code.
- SEDEX self-assessment questionnaire was completed.
- Mohamed Nawar / HR Manager is responsible to ensure compliance with ETI Base Code.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

- Procedures and policies were reviewed.
- Declaration to appoint a management representative for compliance with ETI Base Code were reviewed.
- Sedex self-assessment questionnaire was reviewed.
- Workers interviews.
- Management interview.

Management Systems:

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| A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: Please give details: The site did not receive any fines or prosecutions for non-compliances to any regulations during the last 12 months. |
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| <p>B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: company has well organized management procedures and policies which prohibits all kinds of forced labour, child labour, discrimination, harassment & abuse.</p> |
| <p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p> | <p>company has implemented effectively all procedures and policies. All procedures are communicated to the workers in their language such as forced labour, child labour and discrimination policies. Also, company conducted awareness training programs for all workers in 01/07/2022. Additionally, company has posted the policies on the announcement boards.</p> |
| <p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: All managers and workers in the company received awareness training programs in the standards on forced labour, child labour, discrimination, harassment, health and safety & abuse.</p> |
| <p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: It was evident during the workers' interview that they are aware with company policies and procedures, company provides managers and workers with related awareness training programs and the last training was conducted in 01/07/2022 using the legal requirements and SEDEX guidelines as training material (as reference).</p> |
| <p>F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please give details: GLOBALG.A.P. IFA V5.2 & GRASP GGN: 4063061954381</p> |
| <p>G: Is there a Human Resources manager/department? If Yes, please detail.</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Mohamed Nawar / HR Manager</p> |
| <p>H: Is there a senior person / manager responsible for implementation of the code</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Mohamed Nawar / HR Manager is responsible for implementation of ETI Base Code.</p> |

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| <p>I: Is there a policy to ensure all worker information is confidential?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: company has a policy dated 01/07/2022, stated that all the workers' information is kept in their personnel files at the human resource dept. and this information is confidentiality.</p> |
| <p>J: Is there an effective procedure to ensure confidential information is kept confidential?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: HR manager is implementing HR procedure to keep all the hiring documents and related workers information in personal files kept in safe place.</p> |
| <p>K: Are risk assessments conducted to evaluate policy and procedure effectiveness?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: company conducts annual assessments and updates for all its policies and procedures to check its effectiveness.</p> |
| <p>L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: company has process to do a remediation plan and corrective actions towards any issues found during the risk assessment process.</p> |
| <p>M: Does the facility have a policy/code which require labour standards of its own suppliers?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: company has a policy in place, which is communicated to their suppliers through sending them the related policies and contracts as per legal requirements as well as through verbal communication over the phone.</p> |
| <p>Land rights</p> | |
| <p>N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: the company has valid land rights license.</p> |
| <p>O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: The company has a periodic check from local authorities in order to renew all legal permits and license. The company has all required land rights and permissions as follows: Commercial record No: 19901 Tax card No: 677-622-414 Issue 2/3/2022 expire 1/3/2027</p> |

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| <p>P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No P1: If yes, how does the company obtain FPIC:</p> |
| <p>Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: Please give details: The company is owned by the company owner and he has all the land rights.</p> |
| <p>R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No R1: Please give details: As mentioned in Q.Q.</p> |
| <p>S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details: As mentioned in Q.Q.</p> |

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| Non-compliance: None | |
| <p>1. Description of non-compliance: Nil <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: Local law and/or ETI requirement: Nil Recommended corrective action: Nil</p> | <p>Objective evidence observed: Nil</p> |

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| Observation: None | |
| <p>Description of observation: Nil Local law or ETI requirement: Nil Comments: Nil</p> | <p>Objective evidence observed: Nil</p> |

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| Good Examples observed: None | |
| <p>Description of Good Example (GE): Nil</p> | <p>Objective evidence observed: Nil</p> |

1: Freely Chosen Employment

[\(Click here to return to summary of findings\)](#)

ETI

1.1 There is no forced, bonded or involuntary prison labour.

1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- Company has written policies and procedure dated on 01/07/2022 to be complied with the labour law and ETI base code.
- Company recruited the workers through interviewing with the HR manager and filling application form.
- Mohamed Nawar / HR Manager is implementing HR procedure to check the workers' original documents upon hiring and keep copies of all these documents and related workers information in their personal files.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

- Policy of freely chosen dated 01/07/2022 and employment procedure dated 01/07/2022 were reviewed.
- Work contracts were reviewed for all workers to ensure noticed periods; each worker receive a copy of signed contract by both parties.
- Personal files were reviewed for workers to review the workers hiring documents (copy of birth certificate, copy of ID card, copy of signed contract).
- Worker's interview showed, that no overtime is applied at this site.
- Management interview.

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| <p>A: Is there any evidence of retention of original documents, e.g. passports/ID's</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, please give details and category of workers affected:</p> |
| <p>B: Is there any evidence of a loan scheme in operation</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please give details and category of worker affected:</p> |
| <p>C: Is there any evidence of retention of wages /deposits</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of worker affected:</p> |
| <p>D: Are there any restrictions on workers' freedom to terminate employment?</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> |

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| | D1: Please describe finding: Such case found during the workers interviews, as the workers are free to terminate their work contract with reasonable notice and time. |
| E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'? | <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding: |
| F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, please give details and category of workers affected: |
| G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please give details and category of worker affected: |
| H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of worker affected: |

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| Non-compliance: None | |
| 1. Description of non-compliance: Nil <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law: <input type="checkbox"/> NC against customer code: Local law and/or ETI requirement: Nil Recommended corrective action: Nil | Objective evidence observed: Nil |

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| Observation: None | |
| Description of observation: Nil Local law or ETI requirement: Nil Comments: Nil | Objective evidence observed: Nil |

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| Good Examples observed: None | |
| Description of Good Example (GE): Nil | Objective evidence observed: Nil |

2: Freedom of Association and Right to Collective Bargaining are Respected

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

ETI

- 2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- 2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- 2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- 2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- The facility has written policies and procedures updated on 01/07/2022 they are following the legal law.
- The facility doesn't have a trade union but have workers' representative and has grievance mechanism which allows the workers to use the grievance boxes freely and has open door policy to talk to the management directly without coercion or pressure, in order to report any situation or case related to human rights (working conditions).
- It was evident during the workers interview that the above mechanism is communicated with the open-door policy and grievance policy as they confirmed that they are have the total free access to use these two communication methods with facility management.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

- Written grievance policy and open-door policy updated on 01/07/2022 were reviewed.
- During the workers' interview, they stated that they have positive attitude towards the facility and there were no complaints raised by them.
- Management interview

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| A: What form of worker representation/union is there on site? | <input type="checkbox"/> Union (name) <input type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (specify) Workers Representative <input type="checkbox"/> None |
| B: Is it a legal requirement to have a union? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| C: Is it a legal requirement to have a worker's committee? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| D: Is there any other form of effective worker/management communication channel? (Other | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

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| <p>than union/worker committee e.g. H&S, sexual harassment)</p> | <p>D1: Please give details: All the workers are communicated with Worker Representative and the management through grievance boxes which is located at the main gate for any complaints/ suggestions. The company also has an open-door policy. D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Election conducted in 11/09/2022</p> | |
| <p>E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: There is no workers' representative or union representatives in the facility.</p> | |
| <p>F: Name of union and union representative, if applicable:</p> | <p>N/A</p> | <p>F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p> |
| <p>G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?</p> | <p>Worker Representative name: Ahmed Ibrahim</p> | <p>G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Election record checked</p> |
| <p>H: Are all workers aware of who their representatives are?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> | |
| <p>I: Were worker representatives freely elected?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> | <p>I1: Date of last election: 11/09/2022</p> |
| <p>J: Do workers know what topics can be raised with their representatives?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> | |
| <p>K: Were worker representatives/union representatives interviewed?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please state how many: Ahmed Ibrahim</p> | |
| <p>L: Please describe any evidence that union/worker's committee is effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i></p> | <p>Worker Representative name: Ahmed Ibrahim</p> | |
| <p>M: Are any workers covered by Collective Bargaining Agreement (CBA)?</p> | <p><input type="checkbox"/> Yes <input type="checkbox"/> No N/A</p> | |
| <p>If Yes, what percentage by trade Union/worker representation</p> | <p>M1: 0% workers covered by Union CBA</p> | <p>M2: 0% workers covered by worker rep CBA</p> |
| <p>M3: If Yes, does the Collective Bargaining Agreement (CBA) include rates of pay?</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No NA</p> | |

| Non-compliance: None | |
|---|---|
| 1. Description of non-compliance: Nil <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: Local law and/or ETI requirement: Nil Recommended corrective action: Nil | Objective evidence observed: Nil |

| Observation: None | |
|--|---|
| Description of observation: Nil Local law or ETI requirement: Nil Comments: Nil | Objective evidence observed: Nil |

| Good Examples observed: None | |
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| Description of Good Example (GE): Nil | Objective evidence observed: Nil |

3: Working Conditions are Safe and Hygienic

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

ETI

- 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.
- 3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- The facility provided safe and hygienic working environment according to the risk assessment plan and hazard identification procedure updated on 01/07/2022, also checked health & safety records such as emergency preparedness and response procedure which updated in 01/07/2022 and health & safety work instructions which updated on 01/07/2022 were reviewed.
- Health & safety policy and procedures updated on 01/07/2022, procedures such as the emergency preparedness and response procedure, health & safety work instructions, accident & emergency work instruction, all these policies and procedure were reviewed.
- The facility has provided clean toilet facilities and potable water and provided sanitary facilities for food storage.
- The last training courses, H&S checks and relevant issues updates
- The site designated H&S manager as a senior management representative and he is responsible for Health & Safety issues.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

- Health, safety and hygiene procedures and policies updated on 01/07/2022 were reviewed.
- Safety, hygiene, electric, temperature hazards were identified.
- Facility walkthrough.
- Management interview.
- Workers interviews

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?

- Yes
- No

A1: Please give details: company has general health & safety policies dated 01/07/2022 and procedures dated 01/07/2022 are fit for purpose and these policies are communicated with the workers in their relevant language through the announcement boards.

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| <p>B: Are the policies included in workers' manuals?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: These policies are included in the workers' manual dated 01/07/2022 in their relevant language and they received awareness training program related to these policies.</p> |
| <p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: As observed during the facility walkthrough, there is no additions been made to the original structure.</p> |
| <p>D: Are visitors to the site informed on H&S and provided with personal protective equipment</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: The facility displays H&S instructions posters at the main gate and at prominent places within the facility, as per the norm of production processes inside the facility, PPEs are provided to be worn during the walkthrough.</p> |
| <p>E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: Please give details: The medical room is not provided for the workers in the facility as per Egyptian Labour Law no. 12/2003, article no. 220 that the site shall provide the first aid means for its workers, If the number of the establishment's workers in the same place, or the same town , or in a circle with a radius of fifteen kilometres exceeds fifty workers, the establishment shall employ one or more qualified male nurses for nursing or first aid services in each shift of work at the facility, charge a doctor to visit them at the place provided by the facility for that purpose, and given them the medicines necessary for treatment free of charge.</p> |
| <p>F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: The facility has trained first aiders (2 first aiders) and accessible 4 first aid kits and 2 first aid boxes.</p> |
| <p>G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: It was evident during the workers interviews that they confirmed their satisfaction concerning the transportation which they found safe, suitable and maintained, Also, they stated that no smoking is permitted in the buses.</p> |
| <p>H: Is secure personal storage space provided for workers in their living space and is fit for purpose?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: there are 3 rooms with lockers and there is a worker responsible of it to keep it safe and clean.</p> |
| <p>I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No I1: Please give details: The last H&S risk assessment has been done on 01/07/2022 which covers all the processes in place but it was evident during the documents review that the risks and hazards analysis report did not cover the fire risks in company.</p> |

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| <p>J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: The facility conducts the environmental measurements on regular basis and the last report by Environmental studies and research institute / Sadat University.</p> |
| <p>K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No K1: Please give details: No specific requirements as the facility customer use the (SEDEX supplier workbook and SMETA best practice guidance version 6.1/ May 2019, ETI base code).</p> |

Non-compliance: 3

1. Description of non-compliance:

- It was evident during passing by the fertilizer preparation area that there were no identification signs and occupational health and safety instructions.

NC against ETI NC against Local Law NC against customer code:

Local law and/or ETI requirement

- 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- According to the Egyptian Labor Law No. 12 of 2003, employers are required to provide occupational health and safety instructions to their employees. These instructions must be clear, concise, and easy to understand. They should cover all aspects of the job, including potential hazards, safe work practices, and emergency procedures. Employers must also ensure that employees have access to the necessary personal protective equipment (PPE).

Recommended corrective action:

- The occupational health and safety instructions should be posted in the fertilizer preparation area.

2. Description of non-compliance:

- It was evident during passing by the irrigation water storage tank that there were no warning signs or images on it.

NC against ETI NC against Local Law NC against customer code:

Local law and/or ETI requirement

- 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

Objective evidence observed:

(where relevant please add photo numbers)

"A picture of the occupational health and safety instructions in the fertilizer preparation area."

"A picture of the warning signs at the irrigation water storage tank."

"A picture of the closed electrical room with warning signs on it."

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| <ul style="list-style-type: none"> According to the Egyptian Labor Law No. 12 of 2003, employers are required to use indicative signs in the workplace. These signs must be clear, concise, and easy to understand. They should be placed in areas where they will be seen by employees, such as near potential hazards or at the entrance to work areas. <p>Recommended corrective action:</p> <ul style="list-style-type: none"> The occupational health and safety instructions should be posted in the irrigation water storage tank area. <p>3. Description of non-compliance:</p> <ul style="list-style-type: none"> It was evident during passing by the electrical room that it was open during working hours and there were no warning signs. <p> <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: </p> <p>Local law and/or ETI requirement</p> <ul style="list-style-type: none"> 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. According to the Egyptian Labor Law No. 12 of 2003, employers are required to use indicative signs in the workplace. These signs must be clear, concise, and easy to understand. They should be placed in areas where they will be seen by employees, such as near potential hazards or at the entrance to work areas. <p>Recommended corrective action:</p> <ul style="list-style-type: none"> The warning signs should be in all electrical transformer rooms. | |
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|---|---|
| Observation: None | |
| Description of observation: Nil Local law or ETI requirement: Nil Recommended corrective action: Nil | Objective evidence observed: Nil |

| | |
|--|---|
| Good Examples observed: None | |
| Description of Good Example (GE): Nil | Objective Evidence Observed: Nil |

4: Child Labour Shall Not Be Used

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

ETI

- 4.1 There shall be no new recruitment of child labour.
- 4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.
- 4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- 4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- Employment procedure updated on 01/07/2022 included commitment that the site would never employ and use child labour under the minimum legal age (18 years old). All workers are hired directly, age verification was conducted during the personal files review
- The site has checked workers' original national ID cards at the time of recruitment and kept a copy in their personal files.
- Personal files and age proof verification documents were reviewed.
- The national ID's card included workers names, resident addresses and dates of birth.
- It was evident during the documents review, the age of youngest worker is 21 years old, During the site walkthrough, there were no concerns regarding child labour observed.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

- Employment procedure updated on 01/07/2022; child labour policy updated on 01/07/2022 were reviewed.
- Management interview.
- Workers interviews.
- Documents and records were checked as follows:
 - Personal files for all workers.
 - Copies of birthday certificates for workers.
 - Recent photos.
 - Criminal Records.

| | |
|---|--|
| A: Legal age of employment: | 18 years old. |
| B: Age of youngest worker found: | 21 years old. |
| C: Are there children present on the work floor but not working at the time of audit? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| D: % of under 18's at this site (of total workers) | 0 % |

| | |
|---|---|
| <p>E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details</p> |
|---|---|

| Non-compliance: None | |
|--|--|
| <p>1. Description of non-compliance: Nil <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: Local law and/or ETI requirement: Nil Recommended corrective action: Nil</p> | <p>Objective evidence observed: Nil</p> |

| Observation: None | |
|---|--|
| <p>Description of observation: Nil Local law or ETI requirement: Nil Comments: Nil</p> | <p>Objective evidence observed: Nil</p> |

| Good Examples observed: None | |
|--|--|
| <p>Description of Good Example (GE): Nil</p> | <p>Objective Evidence Observed: Nil</p> |

5: Living Wages are Paid

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key information\)](#)

ETI

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- The site pays sick leave and annual leave.
- Procedure and policy are indicated that the site paid for overtime premiums as per the legal requirements as the following:
 - 135% of workers basic wages to workers for their day light hour's overtime work.
 - 170% of workers basic wages to workers for their night hour's overtime work.
 - 200% of workers basic wages to workers for their weekly day off overtime work.
 - 300% of workers basic wages to workers for their holidays overtime work.
- Workers basic wages were paid based on the local minimum wage standard of 2700 EGP/month, the minimum salary detected was 3500 EGP/ month; this was evident during the documents and records review.
- All workers were provided with written and understandable information about their work condition in respect to wages before they entered to the work and about the particulars of their wages for the pay period concerned every time that they were paid.
- Payrolls Record were reviewed were reviewed during the course of the audit.
- It was evident during the documents review that there are no illegal or unauthorized deductions were observed.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

- Employment procedure updated on 01/07/2022 was reviewed.
- The site complies with legal requirements for wages and benefits, the following documents & records were checked.
 - Payrolls Record were reviewed during the audit.
 - Deduction records.
 - Attendee's records.
 - Incentive records.

Non-compliance: None

| | |
|---|---|
| 1. Description of non-compliance: Nil <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: Local law and/or ETI requirement: Nil Recommended corrective action: Nil | Objective evidence observed: Nil |
|---|---|

| | |
|--|---|
| Observation: None | |
| Description of observation: Nil Local law or ETI requirement: Nil Comments: Nil | Objective evidence observed: Nil |

| | |
|--|---|
| Good Examples observed: None | |
| Description of Good Example (GE): Nil | Objective Evidence Observed: Nil |

Summary Information

| Criteria | Local Law <i>(Please state legal requirement)</i> | Actual at the Site <i>(Record site results against the law)</i> | Is this part of a Collective Bargaining Agreement? |
|--|---|--|---|
| A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i> | Legal maximum: 48 hours / week | A1: 48 hours / week | A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i> | Legal maximum: 12 hours / week | B1: 12 hours / week | B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| C: Wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i> | Legal minimum: 2700 EGP / Month | C1: 3500 EGP / Month | C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| D: Overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i> | Legal minimum: Egyptian labour law 12/2003, article # 85 which required overtime fee is 135 % for day hours and 170 % for night hours. | D1: The site complies with the Egyptian law and pays 135% for day overtime hours and 170 % for night overtime hours | D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

| Wages analysis: (Click here to return to Key Information) | | | |
|---|--|---|---|
| A: Were accurate records shown at the first request? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | |
| A1: If No , why not? | | | |
| B: Sample Size Checked <i>(State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)</i> | 10 Time records and payrolls were reviewed during the course of the audit. | | |
| C: Are there different legal minimum wage grades? If Yes , please specify all. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | C1: If Yes , please give details: | |
| D: If there are different legal minimum grades, are all workers graded and paid correctly? | <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A | D1: If No , please give details: | |
| E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum? | <input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above | E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> 3500 EGP / Month | |
| F: Please indicate the breakdown of workforce per earnings: | F1: ___% of workforce earning under minimum wage F2: ___% of workforce earning minimum wage F3: 100% of workforce earning above minimum wage | | |
| G: Bonus Scheme found: Please specify details: | Bonus Scheme found: Nil <i>Note: type of employee (e.g., full time, temp, etc.) and please state which units e.g. /hour /week/month etc.</i> | | |
| H: What deductions are required by law e.g. social insurance? Please state all types: | Social security– taxes and necessary deductions to be in compliance with the legal requirements. | | |
| I: Have these deductions been made? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | I1: Please list all deductions that have been made. | 1. Social Security 2. Taxes Please describe: necessary deductions to be following the legal requirements. |
| | | I2: Please list all deductions that have not been made. | 1. 2. Please describe: |

| | | |
|---|---|---|
| <p>J: Were appropriate records available to verify hours of work and wages?</p> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| <p>K: Were any inconsistencies found? (if yes describe nature)</p> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <p>K1: Type</p> <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence: |
| <p>L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)</p> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>L1: Please give details: All the working hours are recorded in the time records.</p> | |
| <p>M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i></p> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>M1: Please specify amount/time:</p> | |
| <p>M2: If yes, what was the calculation method used.</p> | <input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fair trade Foundation <p>Other – please give details:</p> | |
| <p>N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).</p> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>N1: Please give details: The site is committed with Egyptian local law 12/2003 article #3; there shall be review for wages in annual basis with a raise of 7%. There is a periodic visit from the work office officials to check wages, insurances and files if there is any non-conformity during the visit, there will be fine.</p> | |
| <p>O: Are workers paid in a timely manner in line with local law?</p> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | |
| <p>P: Is there evidence that equal rates are being paid for equal work:</p> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>P1: Please give details: All workers are receiving fair salaries, exceeding by far the legal minimum wage in the country and that according to seniority and job positions, their salaries vary between 3500 EGP to 6500 EGP.</p> | |
| <p>Q: How are workers paid:</p> | <input checked="" type="checkbox"/> Cash <input type="checkbox"/> Cheque <input type="checkbox"/> Bank Transfer <input type="checkbox"/> Other <p>Q1: If other, please explain:</p> | |

6: Working Hours are not Excessive

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

ETI

6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.

6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where **all** of the following are met:

- this is allowed by national law;
- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
- appropriate safeguards are taken to protect the workers' health and safety; and
- The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- The normal working days schedule is from Saturday to Thursday. Friday is the weekly rest day. The normal working hours starting from 08:00 to 16:00 with one hour for lunch break from 12:00 till 13:00
- All sampled workers take rest 1 day per week and work a 6 days / week based on Egyptians labour law.
- All the workers are hired directly to the site and there are no agency workers in the site.
- It was evident during the workers interview and documents review that the overtime is rare and it is voluntarily; information from worker interviews coincides with time and payroll records. The sampled workers stated that they have worked 2 overtime hours per day due to the urgent business needs (Shipments) and peak seasons and it was confirmed during the time records review.
- The site uses manual attendance sheets to record working hours and for payrolls, were reviewed during the audit. During the documents review, there were no concerns regarding the working hours observed.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

- Employment procedure updated on 01/07/2022 was reviewed.
- Documents and records review included attended sheet and production records were checked.
- Attended time records for payrolls were reviewed during the audit.
- Worker's interview

Non-compliance: None

1. Description of non-compliance: Nil

NC against ETI NC against Local Law NC against customer code:

Local law and/or ETI requirement: Nil

Recommended corrective action: Nil

Objective evidence observed: Nil

Observation: None

Description of observation: Nil
Local law or ETI requirement: Nil
Comments: Nil

Objective evidence observed: Nil

Good Examples observed: None

Description of Good Example (GE): Nil

Objective Evidence Observed: Nil

Working hours' analysis

Please include time e.g. hour/week/month
[\(Go back to Key information\)](#)

Systems & Processes

A. What timekeeping systems are used: time card etc.

Describe: Manual Attendance Sheets.

B: Is sample size same as in wages section?

Yes
 No
 B1: If no, please give details

C: Are standard/contracted working hours defined in **all** contracts/employment agreements?

Yes
 No
 C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.
 Please give details:

| | | | | | |
|--|--|--|------------------------------------|---------------------------------------|--------------------------------|
| D: Are there any other types of contracts/employment agreements used? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | D1: If YES, please complete as appropriate: | | | |
| | | <input type="checkbox"/> 0 hrs | <input type="checkbox"/> Part time | <input type="checkbox"/> Variable hrs | <input type="checkbox"/> Other |
| | | If "Other", Please define: | | | |
| | | NA | | | |
| E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | E1: If yes , please detail hours, %, types of workers affected and frequency Please give details: NA | | | |
| F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period? | F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain: | F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | | |
| | | Maximum number of days worked without a day off (in sample): | | | |
| | | 6 days' work and 1 day off (Friday) | | | |
| Standard/Contracted Hours worked | | | | | |
| G: Were standard working hours over 48 hours per week found? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | G1: If yes, % of workers & frequency: | | | |
| | | Nil | | | |
| H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | H1: If yes, please give details: | | | |
| | | | | | |
| Overtime Hours worked | | | | | |
| I: Actual overtime hours worked in sample (State per day/week/month) | Highest OT hours: 2 Hours / Day. | | | | |
| J: Combined hours (standard or contracted + overtime hours = total) over 60 found? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | | | |

| | | |
|--|---|---|
| Please give details: | | |
| K: Approximate percentage of total workers on highest overtime hours: | 100% | |
| L: Is overtime voluntary? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information | <i>L1: Please detail evidence e.g., Wording of contract/employment agreement/handbook/worker interviews/refusal arrangements: N/A</i> |
| Overtime Premiums | | |
| M: Are the correct legal overtime premiums paid? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium | <i>The site pays overtime premiums as per Egyptian labour law No. 12/2003, Article # 85 which required overtime fee as following: a.135% of workers basic wages to workers for their day light hour's overtime work. b.170% of workers basic wages to workers for their night hour's overtime work. c.200% of workers basic wages to workers for their weekly day off overtime work. d.300% of workers basic wages to workers for their holidays overtime work.</i> |
| N: Is overtime paid at a premium? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <i>The site pays overtime premiums as per Egyptian labour law No. 12/2003, Article # 85 which required overtime fee as following: a.135% of workers basic wages to workers for their day light hour's overtime work. b.170% of workers basic wages to workers for their night hour's overtime work. c.200% of workers basic wages to workers for their weekly day off overtime work. d.300% of workers basic wages to workers for their holidays overtime work.</i> |
| O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant. | <input checked="" type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other | <p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p> <p><i>The site pays overtime premiums as per Egyptian labour law No.12 /2003, Article # 85 which required overtime fee as following:</i></p> |

| | |
|--|---|
| | <p>a.135% of workers basic wages to workers for their day light hour's overtime work.</p> <p>b.170% of workers basic wages to workers for their night hour's overtime work.</p> <p>c.200% of workers basic wages to workers for their weekly day off overtime work.</p> <p>d.300% of workers basic wages to workers for their holidays overtime work.</p> |
| <p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p> | <p><input checked="" type="checkbox"/> Overtime is voluntary</p> <p><input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week</p> <p><input type="checkbox"/> Safeguards are in place to protect worker's health and safety</p> <p><input type="checkbox"/> Site can demonstrate exceptional circumstances</p> <p><input type="checkbox"/> Other reasons (please specify)</p> <hr/> <p>P1: Please explain any checked boxes above e.g., detail of consolidated pay / CBA or other:</p> <hr/> <p>The workers don't work more than 60 hours / week as mentioned in the time records.</p> |
| <p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p> | <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>Q1: If yes, please give details:</p> |
| <p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p> | <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> |

7: No Discrimination is Practiced

[\(Click here to return to summary of findings\)](#)

ETI

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- It was noted during the interview with the management and workers and documents review that there was no discrimination on hiring, compensation, promotion, termination or retirement and access to training.

- The site provided the same payment for workers from the same category and experience.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

- Employment procedure updated on 01/07/2022 was reviewed.
- Management interview
- Worker's interview.
- Documents and records were reviewed as follows:
 - Application form.
 - Grievance and suggestion box.

| | |
|--|--|
| A: Gender breakdown of Management + Supervisors (Include as one combined group) | A1: Male: 100 % A2: Female 0 % |
| B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst: | 0 |
| C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?: | <input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found C1: Please give details: It was evidence during site tour, worker interviews and documented review not found any evidence of discrimination based on race, caste, national origin, religion, age, disability and sexual orientation. |

Professional Development

| | |
|---|---|
| A: What type of training and development are available for workers? | N/A, there is no professional training available to the workers |
|---|---|

| | |
|--|---|
| B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details: |
|--|---|

Non-compliance: None

| | |
|---|---|
| 1. Description of non-compliance: Nil <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: Local law and/or ETI requirement: Nil Recommended corrective action: Nil | Objective evidence observed: Nil |
|---|---|

Observation: None

| | |
|--|---|
| Description of observation: Nil Local law or ETI requirement: Nil Comments: Nil | Objective evidence observed: Nil |
|--|---|

Good Examples observed: None

| | |
|---------------------------------------|---|
| Description of Good Example (GE): Nil | Objective Evidence Observed: Nil |
|---------------------------------------|---|

8: Regular Employment Is Provided

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

ETI

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

Additional Elements: Responsible Recruitment

8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.

8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.

8.5 Employment agencies must only supply workers registered with them.

8.6 Workers pay no recruitment fee at any stage of the recruitment process.

8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- Work performed was on the basis of recognized work relationship established through national law and practice.
- All workers signed the labour contracts with the site upon their hiring (on the first day of work).
- There was no home – working.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

- Policy and procedure updated on 01/07/2022 were reviewed.
- Management interview.
- Workers interviews.
- Documents and records were reviewed as following:
 - Payroll records were reviewed.
 - Based on the labour contract, all the workers are covered with social insurance
 - Labour contracts are matching with the legal requirements were reviewed.

Non-compliance: None

1. Description of non-compliance: Nil

NC against ETI NC against Local Law NC against customer code:

Objective evidence observed: Nil

| | |
|---|--|
| Local law and/or ETI requirement: Nil Recommended corrective action: Nil | |
|---|--|

| Observation: None | |
|--|---|
| Description of observation: Nil Local law or ETI requirement: Nil Comments: Nil | Objective evidence observed: Nil |

| Good Examples observed: None | |
|--|---|
| Description of Good Example (GE): Nil | Objective Evidence Observed: Nil |

Responsible Recruitment

| All Workers | |
|--|---|
| A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions? | <input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions A1: If any are unchecked, please describe finding and specific category(ies) of workers affected: |
| B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please describe details and specific category(ies) of workers affected: |

| | |
|---|---|
| <p>C: If yes, check all that apply:</p> | <input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – <p>C1: If other, please give details:</p> |
| <p>D: If any checked, give details:</p> | <p>NA</p> |

| | | | |
|---|---|--|--------------------------|
| <p>Migrant Workers: N/A</p> <p><i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i></p> | | | |
| <p>A: Type of work undertaken by migrant workers:</p> | | | |
| <p>B: Please give details about recruitment agencies for migrant workers:</p> | <p>B1: Total number of (in country recruitment agencies) used:</p> <p>B2: Total number of (outside of local country) recruitment agencies used:</p> | | |
| <p>C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?</p> | <table border="1" style="width: 100%;"> <tr> <td style="width: 50%;"> <input type="checkbox"/> Yes <input type="checkbox"/> No <p>C1: Please describe finding:</p> </td> <td style="width: 50%;"> <p>C2: Observations:</p> </td> </tr> </table> | <input type="checkbox"/> Yes <input type="checkbox"/> No <p>C1: Please describe finding:</p> | <p>C2: Observations:</p> |
| <input type="checkbox"/> Yes <input type="checkbox"/> No <p>C1: Please describe finding:</p> | <p>C2: Observations:</p> | | |
| <p>D: Are Any migrant workers in skilled, technical, or management roles</p> <p><i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i></p> | <input type="checkbox"/> Yes <input type="checkbox"/> No <p>D1: If yes, number and example of roles:</p> | | |

NON-EMPLOYEE WORKERS

| Recruitment Fees: N/A | |
|----------------------------------|---|
| A: Are there any fees? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| B: If yes, check all that apply: | <input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other B1 – If other, please give details: |
| C: If any checked, give details: | |

| Agency Workers (if applicable) | |
|--|---|
| <i>(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)</i> | |
| A: Number of agencies used (average): | A1: Names if available: |
| B: Were agency workers' age / pay / hours included within the scope of this audit? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| C: Were sufficient documents for agency workers available for review? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| D: Is there a legal contract / agreement with all agencies? | <input type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: |

| | |
|---|---|
| <p>E: Does the site have a system for checking labour standards of agencies? If yes, please give details.</p> | <input type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: |
|---|---|

Contractors: N/A

Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,

| | |
|--|---|
| <p>A: Any contractors on site?</p> | <input type="checkbox"/> Yes <input type="checkbox"/> No A1: If yes, how many contractors are present, please give details: |
| <p>B: If Yes, how many workers supplied by contractors?</p> | |
| <p>C: Do all contractor workers understand their terms of employment?</p> | <input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: |
| <p>D: If Yes, please give evidence for contractor workers being paid per law:</p> | |

8A: Sub-Contracting and Homeworking

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

8A.1 There should be no sub-contracting unless previously agreed with the main client.

8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.

Note to auditor on homeworking:

Report on whether it is direct or via agents. How many workers, relationship with site and what control systems are in place.

Note to auditor on subcontracting: auditor should use this section for subcontractors of part made or wholly made finished goods, this section should not be used for raw material manufacturers unless instructed otherwise by customers

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- There are no Sub-contracting /home workers hired by the site, as all orders were produced in the site premises.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

If any processes are sub-contracted – please populate below boxes

| Process Subcontracted | Process 1 | Process 2 |
|-----------------------|-----------|-----------|
| Name of factory | | |
| Address | | |

Details:

Non-compliance: None

1. Description of non-compliance: Nil

NC against ETI/Additional Elements

NC against Local Law

NC against customer code:

Local law and/or ETI /Additional Elements requirement: Nil

Recommended corrective action: Nil

Objective evidence observed: Nil

Observation: None

Description of observation: Nil

Local law or ETI/Additional elements requirement: Nil

Comments: Nil

Objective evidence observed: Nil

Good Examples observed: None

Description of Good Example (GE): Nil

Objective Evidence Observed: Nil

| Summary of sub-contracting – if applicable <input checked="" type="checkbox"/> Not Applicable please x | |
|---|---|
| A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting? | <input type="checkbox"/> Yes <input type="checkbox"/> No A1: Please describe: |
| B: If sub-contractors are used, is there evidence this has been agreed with the main client? | <input type="checkbox"/> Yes <input type="checkbox"/> No B1: If Yes , summarise details: |
| C: Number of sub-contractors/agents used: | |
| D: Is there a site policy on sub-contracting? | <input type="checkbox"/> Yes <input type="checkbox"/> No D1: If Yes , summarise details: |
| E: What checks are in place to ensure no child labour is being used and work is safe? | |

| Summary of homeworking – if applicable <input checked="" type="checkbox"/> Not Applicable please x | | | |
|--|---|-------------|--|
| A: If homeworking is being used, is there evidence this has been agreed with the main client? | <input type="checkbox"/> Yes <input type="checkbox"/> No A1: If Yes , summarise details: | | |
| B: Number of homeworkers | B1: Male: | B2: Female: | Total: |
| C: Are homeworkers employed direct or through agents? | <input type="checkbox"/> Directly <input type="checkbox"/> Through Agents | | C1: If through agents, number of agents: |
| D: Is there a site policy on homeworking? | <input type="checkbox"/> Yes <input type="checkbox"/> No | | |
| E: How does the site ensure worker hours and pay meet local laws for homeworkers? | | | |
| F: What processes are carried out by homeworkers? | | | |
| G: Do any contracts exist for homeworkers? | <input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: | | |

H: Are full records of homeworkers available at the site?

- Yes
- No

9: No Harsh or Inhumane Treatment is Allowed
[\(Click here to return to summary of findings\)](#)

ETI

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

Additional elements:

9.2 companies should provide access to a confidential grievance mechanism for all workers

| | |
|---|--|
| <p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?</p> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>A1: Please give details: The site has not published and does not provide open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party.</p> |
| <p>B: If Yes, are workers aware of these channels and have access? Please give details.</p> | N/A |
| <p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p> | N/A |
| <p>D: Which of the following groups is there a grievance mechanism in place for?</p> | <input checked="" type="checkbox"/> Workers <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> OtherD1: Please give details: The site has a grievance mechanism as they have an open-door policy and grievance box (1 box) as well. Mr. Ahmed Bakry/ HR and Admin Manager is in charge to check this box on weekly basis. |
| <p>E: Are there any open disputes?</p> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>E1: If yes, please give details</p> |
| <p>F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)</p> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>F1: If no, please give details</p> |
| <p>G: Is there a published and transparent disciplinary procedure?</p> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>G1: If no, please explain</p> |
| <p>H: If yes, are workers aware of these the disciplinary procedure?</p> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>H1: If no, please give details</p> |

| | |
|---|---|
| I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No II: If yes, please give details |
|---|---|

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- The site has written anti-harsh or inhumane treatment policy updated on 01/07/2022 was reviewed; This policy is included commitment declared that the physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is prohibited.
- There is no physical abuse or discipline in the site and the discipline procedure of the site was verbal warning and deduction as per the management and workers' interviews.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

- The policy for no harsh or inhumane treatment updated on 01/07/2022 was reviewed.
- Management interview.
- Workers interviews.

Non-compliance: None

| | |
|---|---|
| 1. Description of non-compliance: Nil <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: Local law and/or ETI requirement: Nil Recommended corrective action: Nil | Objective evidence observed: Nil |
|---|---|

Observation: None

| | |
|--|---|
| Description of observation: Nil Local law or ETI requirement: Nil Comments: Nil | Objective evidence observed: Nil |
|--|---|

Good Examples observed: None

| | |
|---------------------------------------|---|
| Description of Good Example (GE): Nil | Objective Evidence Observed: Nil |
|---------------------------------------|---|

10. Other Issue areas: 10A: Entitlement to Work and Immigration

[\(Click here to return to NC-table\)](#)

Additional Elements

10A.1 Only workers with a legal right to work shall be employed or used by the supplier.
 10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- Only workers who have the legal right to work shall be hired by the site. There were no agency workers, employment agencies or immigration workers present.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

- The site does not have any migrant workers. All the site workers are Egyptians.

Non-compliance: None

1. Description of non-compliance: Nil

- NC against ETI/Additional Elements NC against Local Law
 NC against customer code:

Local law and/or ETI /Additional Elements requirement: Nil

Recommended corrective action: Nil

Objective evidence observed: Nil

Observation: Nil

Description of observation: Nil

Local law or ETI/Additional Elements requirement: Nil

Comments: Nil

Objective evidence observed: Nil

Good examples observed: Nil

Description of Good Example (GE): Nil

Objective Evidence Observed: Nil

10. Other issue areas 10B2: Environment 2–Pillar

[\(Click here to return to summary of findings\)](#)

To be completed for a 2–Pillar SMETA Audit, and remove the following page which is 10B4 environment 4 pillar

10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.

10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements. Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- The site has environmental policy updated on 01/07/2022 which covering their environmental impact and communicated to all the suppliers and customers.
- The site has measured the impacts and these impacts are mentioned in the last environmental impacts report and the last report was on 01/07/2022.
- Environmental Policy includes the site committee to ensure the continuous improvements in their environmental performance.
- The site has established and maintained environmental management system updated on 01/07/2022
- The site has designated H&S Manager who found in charge of continuous improvements in their environmental performance.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

- Environmental policy updated on 01/07/2022 was reviewed.
- During the site walkthrough, it was evident that the site controls the solid wastes especially the empty containers inside the chemicals store and keeps the solid wastes to be disposed by local municipality on daily basis.
- Waste disposal contract with the local authorities dated on 06/09/2021, the contract was reviewed.
- Last updates of the Egyptian Environmental Laws # 04/2004, 09/2009 and their associated decrees.

Non-compliance: None

1. Description of non-compliance: Nil

NC against ETI/Additional Elements NC against Local Law

Local law and/or ETI/Additional Elements requirement: Nil

Recommended corrective action: Nil

Objective evidence observed: Nil

Observation: None

Description of observation: Nil

Local law or ETI/additional elements requirement: Nil

Objective evidence observed: Nil

| | |
|---------------|--|
| Comments: Nil | |
|---------------|--|

| | |
|---------------------------------------|---|
| Good examples observed: None | |
| Description of Good Example (GE): Nil | Objective Evidence Observed: Nil |

Other findings

Other Findings Outside the Scope of the Code




None

Community Benefits

(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)

None

Photo Form

| | | |
|---|--|--|
|  |  |  |
| <p>Main Gate</p> | <p>Accommodation</p> | <p>Accommodation</p> |

| | | |
|---|---|--|
|  |  |  |
| <p>WC</p> | <p>Washing Machine</p> | <p>Fertilizing area</p> |

| | | |
|--|--|---|
|  |  |  |
|--|--|---|

| Assembly point | Assembly point control point | Irrigation water storage |
|--|---|---|
|  |  |  |
| NC | Irrigation water filters | Liquid manure storage tanks |

| | | |
|---|--|--|
|  |  |  |
| <p>Grapes Plot</p> | <p>Grapes Crop</p> | <p>Protective Clothes</p> |

| | | |
|---|--|---|
|  |  |  |
|---|--|---|

| | | |
|-------------------|---------------|----------|
| Fire Extinguisher | First aid kit | Tractors |
|-------------------|---------------|----------|



For more information visit: [Sedexglobal.com](https://www.sedexglobal.com)

Your feedback on your experience of the SMETA audit you have observed is extremely valuable. It will help to make improvements to future versions.

You can leave feedback by following the appropriate link to our questionnaire:

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[http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

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