

Sedex Members Ethical Trade Audit Report

Version 7



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Audit content

(1) A SMETA audit was conducted which included some or all of labour standards, health and safety, environment and business ethics. The SMETA minimum requirements were applied and the SMETA auditor manual was followed. 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.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the code areas below.

2-pillar audits include:

- Labour standards:
 - 0. Enabling accurate assessment
 - 1. Employment is freely chosen
 - 1.A. Responsible recruitment and entitlement to work
 - 2. Freedom of association and right to collective bargaining are respected
 - 4. Child labour shall not be used
 - 5. Legal wages are paid
 - 5.A. Living wages are paid
 - 6. Working hours are not excessive
 - 7. No discrimination is practiced
 - 8. Regular employment is provided
 - 8.A. Sub-contracting and homeworkers are used responsibly
 - 9. No harsh or inhumane treatment is allowed
- Health and safety:
 - 3. Working conditions are safe and hygienic
- Environment:
 - 10.A. Environment 2-pillar

4-pillar audits include, in addition to the above:

- Environment:
 - 10.B. Environment 4-pillar
- Business ethics:
 - 10.C. Business ethics

(2) Where appropriate, non-compliances or non-conformances were raised where either local law or the base code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.

(3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

Audit details

Site details

Sedex site reference	ZS1000001348	Site name	EDEN for Agriculture
Business name	EDEN for Agriculture	Site address	21523 Apartment 407 Entrance B Grand Smouha Buildings, 14th of May Road St, Sidi Gaber, Alexandria, 21523 , Alexandria - Alexandria Egypta,Egypt Kilometer 13 Alexandria-Cairo Agricultural Road, n, Alexandria, EG

Audit details

Sedex company reference	ZC5000001273	Auditor company name	LSQA MIDDLE EAST
Date of audit	2025-07-05	Audit conducted by	Ahmed Huss
Audit pillars	Labour Standards Health and safety		
Time in and out	Day 1		
	In	09:00	
	Out	17:40	
Audit type	Periodic		
Was the audit announced?	Announced		
Was the Sedex SAQ available for review?	Yes		
Who signed and agreed CAPR?	Sabry El Gamal / Director of Planning , Follow-up Department and Quality Assurance Manager		
Any conflicting information SAQ/Pre-Audit Info	No		
Is further information available?	No		

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Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	No	No
B: Present at the audit?	Yes	No	No
C: Present at the closing meeting?	Yes	No	No
Reason for absence at the opening meeting	N/A, there is no union representative or worker representative in the site as this is not obligatory/requirement under local		
Reason for absence during the audit	N/A, there is no union representative or worker representative in the site as this is not obligatory/requirement under local		
Reason for absence at the closing meeting	N/A, there is no union representative or worker representative in the site as this is not obligatory/requirement under local		

SMETA declaration

Auditor team

SMETA declaration	<p>I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.</p> <ol style="list-style-type: none"> Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question. <p>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.</p>		
Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)	None		
Lead auditor	Ahmed Huss	APSCA Number	21703115
Additional auditor			
Date of declaration	2025-07-05		





































Site representation

Declaration	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
Full name	Sabry El Gamal
Title	Director of Planning , Follow-up Department and Quality Assurance Manager
Date of declaration	2025-07-05

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.N Maintain a log of all hazardous substance...	Local law Base code	NC ZAF-

Management systems

	Policies and procedures	Resources	Communication and training	Monitoring
1. Employment is freely chosen				
1.A. Responsible recruitment and entitlement to work				
2. Freedom of association and right to collective bargaining are respected				
3. Working conditions are safe and hygienic				
4. Child labour shall not be used				
5. Legal wages are paid				
6. Working hours are not excessive				
7. No discrimination is practiced				
8. Regular employment is provided				



Not addressed



Fundamental improvements required



Some improvements recommended







Robust management systems

[← Summary of findings](#)

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	Policies and procedures	Resources	Communication and training	Monitoring
8.A. Sub-contracting and homeworkers are used responsibly	✓	✓	✓	✓
9. No harsh or inhumane treatment is allowed	i	i	i	i
10.A. Environment 2-Pillar	i	i	i	i

-  Not addressed
-  Fundamental improvements required
-  Some improvements recommended
-  Robust management systems

Site details

Company and site details

Sedex company reference	ZC5000001273	
Sedex site reference	ZS1000001348	
Company name	EDEN for Agriculture	
Business ownership type	GOODS	
Site name	EDEN for Agriculture	
Site name in local language		
GPS location	GPS address	-Office : Smouha , Smouha grand building (Tower B) , The end of the 14th May Bridge infront of green plaza , Alexandria-Egypt -site : Abu Bakr village – El Nubaria – El Beheira -Egypt
	Coordinates	30°42'05.4"N 30°08'24.0"E
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	Sabry El Gamal
	Job title	Director of Planning , Follow-up Department and Quality Assurance Manager
	Phone number	01017316300
	Email	sabryelgamal@edenagricultural.com
Applicable business and other legally required business license numbers and documents	-Commercial record No: 19102 Issue date :15/02/2022 Expire: 14/02/2027 -Tax card No: 677-622-414 Issue date :20/08/2024 Expiry date :19/08/2029 -Export record:600010279 Issue date :31/03/2022 Expiry date :30/03/2027	

[← Management systems](#)

[Worker analysis →](#)

Site activities

Site function	Grower	
Site activities	Primary	Mixed farming
	Secondary	
	Other	
Product type	Cabbage, Garlic , Grape (table) , Green bean , Lemon , Lettuce , Mandarin , Onion , Orange , Spring onion, Sweet potato, Strawberry	
Process overview	-Farming activities of Cabbage, Garlic , Grape (table) , Green bean , Lemon , Lettuce , Mandarin , Onion , Orange , Spring onion, Sweet potato, Strawberry - the total area is 80 acres (50 acres of grape , 15 acres of citrus , 15 acres of (Cabbage, Garlic , Green bean , Lemon , Lettuce , Onion , Spring onion, Sweet potato, Strawberry) - the site have 02 tractors 02 Automizers	
What level of mechanization best describes the work at this site?	Low mechanisation / high manual Labour	

Site scope

Is the audited site a physically continuous area?	Yes	
What is the area of audited site to its boundary?	60000m ²	
Building 1	Last construction works on site	2022
	If building is shared, provide details	N/A, there are no other facilities that share the same building with the audited site.
	Number of floors	1
	Description of floor activities	Security room

[← Site details](#)

[Worker analysis →](#)

Site scope

Building 2	Last construction works on site	2022
	If building is shared, provide details	N/A, there are no other facilities that share the same building with the audited site.
	Number of floors	2
	Description of floor activities	The first floor chemicals warehouse , a dining area, and a Rest area , workers Accommodation The second floor is administrative offices , workers Accommodation
Building 3	Last construction works on site	2022
	If building is shared, provide details	N/A, there are no other facilities that share the same building with the audited site.
	Number of floors	2
	Description of floor activities	The first and second floors is administrative offices.
Is there any difference between the site scope of the audit and the Sedex site profile?	No	
Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?	No	
Is any activity conducted onsite not included within the scope of the audit?	No	

Worker accommodation and transport

Are there any site-provided worker accommodation buildings?	Yes
Is the accommodation within the perimeter of the site audited?	Onsite
Is the accommodation contractually mandated for workers?	Optional

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[Worker analysis →](#)

Worker accommodation and transport

Who provides the accommodation?	Site
Was all accommodation (whether directly or via third parties, off or onsite) included in this audit?	<p>All</p> <p>Yes – All accommodation was included in this audit. This included inspections of living conditions, health and safety measures, hygiene standards, and compliance with relevant regulations to ensure that all accommodations met the required standards.</p>
Does the site organise worker transport to the worksite?	<p>Site provided</p> <p>Yes – the site organizes worker transport to the worksite. The company provides organized transportation for workers to and from the worksite. This includes scheduled buses or vans arranged by the site management to ensure timely and safe arrival of workers. The transport is coordinated to align with shift times, and vehicles used meet safety and comfort standards. This service supports worker convenience, reduces commute-related stress, and helps maintain punctuality and productivity.</p>

Work patterns

Approximate workers on site per month (% of peak)	January	90-95%	February	75-90%
	March	75-90%	April	95-100%
	May	95-100%	June	95-100%
	July	95-100%	August	95-100%
	September	75-90%	October	90-95%
	November	90-95%	December	90-95%
Is there any night shift work at the site?	No			

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact?	<p>Other certification</p> <p>Global Gap , GRASP , Spring : GGN : 4063651183139 -ISO9001:2015</p>
Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community?	<p>No</p> <p>-During the facility walkthrough and documents review, it was evident that the facility has not assessed for the negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community.</p>

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Site assessments

Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?	No During the facility walkthrough and documents review, it was evident that there is no Human Rights Impact Assessment (HRIA) had ever been conducted at the facility.
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[← Site details](#)

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Worker analysis

Gender disaggregated data available

Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	21 (100%)	0 (0%)	- -	21 (100%)

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	6 (100%)	0 (0%)	- -	6 (28.6%)
Temporary or fixed term employees	15 (100%)	0 (0%)	- -	15 (71.4%)
Agency or subcontracted workers	0 -	0 -	- -	0 (0%)
Seasonal workers	0 -	0 -	- -	0 (0%)
Self-employed workers	0 -	0 -	- -	0 (0%)
Informal workers including home workers	0 -	0 -	- -	0 (0%)
Apprentices, trainees or interns	0 -	0 -	- -	0 (0%)

* % of total workforce

[← Site details](#)

[Worker interviews →](#)

Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	0 -	0 -	- -	0 (0%)
International migrant workers	0 -	0 -	- -	0 (0%)
Total migrant workers	0 -	0 -	- -	0 (0%)

* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from N.A, there is no migrant workers in the site.

Workers by age

	Men	Women	Other	Total
18 - 24 years old	5 (100%)	0 (0%)	- -	5 (23.8%)
15 - 17 years old	0 -	0 -	- -	0 (0%)
Under 15 years old	0 -	0 -	- -	0 (0%)

* % of total workforce

[← Worker analysis](#)

[Worker interviews →](#)

Is the worker analysis data relevant for peak season and current to the audit? Yes

Please list the nationalities of all workers, with the three most common nationalities listed first Egyptian

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Egyptian	100%	0%	-	100%

Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 -	0 -	- -	0 (0%)
Workers paid based on a mix of 'piece work' and hourly rate	0 -	0 -	- -	0 (0%)
Workers paid hourly / daily rate	0 -	0 -	- -	0 (0%)
Salaried workers	21 (100%)	0 (0%)	- -	21 (100%)

* % of total workforce

Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 -	0 -	- -	0 (0%)
Paid weekly	0 -	0 -	- -	0 (0%)
Paid monthly	21 (100%)	0 (0%)	- -	21 (100%)
Other	0 -	0 -	- -	0 (0%)

* % of total workforce

If other payment cycle entered, please provide details Nine

[← Worker analysis](#)

[Worker interviews →](#)

People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	1 (100%)	0 (0%)	- -	1
Supervisors or team leaders	1 (100%)	0 (0%)	- -	1
Administrative staff	1 (100%)	0 (0%)	- -	1

[← Worker analysis](#)

[Worker interviews →](#)

Worker interview summary

Gender disaggregated data available Men and women

Which methods of worker engagement were used? Individual interviews
Group interviews

Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?

Was the interview sample representative of all types of nationality and employment types of workers? Yes

Was the interview sample representative of the gender composition of the workforce? Yes

Number and size of group interviews 1 Group X 5 Workers.

Did workers understand the purpose of the audit? Yes

Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers? Yes

Was there any indication that workers had been 'coached' in how they should respond to questions? No

What was the general attitude of the workers towards their workplace? Favorable

[← Worker analysis](#)

[Measuring workplace impact →](#)

Attitude of workers

In which areas did workers raise significant concerns or complaints?	Other (provide details) There were no complaints raised by the interviewed workers.
What did the workers like the most about working at this site?	Accommodation standards Communication (e.g. from management) Connectivity (e.g. Wi-Fi) Equal opportunities Facilities (e.g. rest area, recreation, canteen) Grievance mechanisms Transport
Additional comments	These advantages are according to the Workers interview
Attitude of workers' committee/union representatives	N/A, there is no worker representative in the firm as this is not obligatory / requirement under local law
Attitude of managers	The site management was found to be cooperative throughout the audit and had a positive attitude towards the lead auditor.

Workers interviewed by type

	Total
Permanent workers	5
Temporary or fixed-term employees	5
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	10

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	5	0	-	5
Workers interviewed individually	5	0	-	5

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	0	0	-	0
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	0	0	-	0

[← Worker interviews](#)

[Measuring workplace impact →](#)

Measuring workplace impact

Gender disaggregated data available Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

* Number of workers leaving in last 12 months as a % of average total number of workers on site over the year.

Rate of absenteeism (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

Number of days lost through job absence in the year, calculated as: (Number of days lost through job absence in the year) / [(Number of employees on 1st day of the year + Number of employees on the last day of the year) / 2] * (Number of available workdays in the year).

Are accidents recorded?

Yes

- Accidents and injury record dated 10/6/2025 was reviewed during the documents review and it was formal one which is delivered to the legal social insurance office, and stating that there are no injuries at the site.

- As per the Egyptian labor law article: 270 The establishment is required to provide first aid equipment for its workers.
If the number of workers in a single location or country, or within a 15-kilometer radius, exceeds fifty workers, the establishment must employ one or more qualified nurses to perform nursing or first aid duties during each work shift. Additionally, the establishment must assign a doctor to treat workers at a designated clinic within the premises and provide necessary medicines free of charge.
If a worker is treated in a government or charitable hospital as mentioned in the first and second paragraphs of this article, the establishment is obliged to cover the costs of treatment, medication, and accommodation at the hospital.
The procedures for determining the costs of treatment, medication, and accommodation mentioned in the previous paragraphs will be determined by a decision issued by the competent minister in coordination with the minister responsible for health matters.

Annual number of work related accidents and injuries (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

* Calculated as (number of work related accidents and injuries * 100) / number of total workers.

Lost day work cases (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

* Calculated as (number of lost days due to work accidents and work related injuries * 100) / number of total workers.

Percentage of workers that work on average more than 48 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

Percentage of workers that work on average more than 60 total hours in a given week

	Men	Women	Other	Total
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Percentage of workers that work on average more than 60 total hours in a given week

Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			
Systems and evidence examined to validate this code section	<p>1. Audit process consisted of a facility site tour , covering all operative and non-operative areas, confidential interviews, and document review. The company provided full access to all areas, as well as all requested documents were provided for review. Interviews were conducted in accordance with best practices requirements and in a confidential manner. No bribery attempt.</p> <p>2. The evidence examined during the audit:</p> <ul style="list-style-type: none"> a. Business Licenses. b. HR Policies. c. Management interview. d. Workers interviews (10 workers). e. Training records. 		

0. Enabling accurate assessment

Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment?	No
Did any workers selected by the auditor decline to be interviewed?	No

1. Employment is freely chosen

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended

Management systems

Explanation for management systems grades

1. Establish and maintain relevant policies and procedures to ensure workplace requirements are met:

Reason for improvement: The recommendation indicates that the company has basic policies in place, but these are not comprehensive, well-defined, or regularly updated to fully reflect the standards for self-employment and voluntary work. There are gaps in the way the company ensures that work is truly voluntary, and clearer and more specific policies and processes are needed to ensure full compliance with labor rights regulations.

2. Appoint a manager with sufficient seniority to be responsible for implementing procedures:

Reason for improvement: This indicates a lack of accountability at the senior management level regarding the implementation of labor policies. The recommendation suggests appointing a senior manager with the necessary authority to oversee the implementation of policies and ensure that procedures are followed. The lack of oversight by senior management results in ineffective implementation of ethical labor practices.

3. Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures:

Reason for improvement: Effective communication and training is critical to ensure that all employees—both management and employees—understand the importance of self-employment and voluntary work. This recommendation highlights the need for more systematic and regular training and communication efforts to raise awareness among employees, managers, and supervisors of their rights and responsibilities related to working conditions. This training should focus on eliminating any instances of forced or coercive labor.

4. Monitoring the effectiveness of procedures to meet policy and work environment requirements:

Reasons for improvement: Even if policies and procedures exist, it is important to regularly monitor and evaluate their effectiveness in practice. This recommendation suggests that the company needs to implement stronger monitoring and auditing systems to assess whether existing policies effectively prevent practices such as forced labor, human trafficking, or other violations of self-employment standards.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

[← Code area 0](#)

[Code area 1.A →](#)

Systems and evidence examined to validate this code section

1. The facility is committed to comply with applicable legislation and policies of the company. During the facility tour, and the employee's interviews were no evidence of forced, bonded or involuntary labor.
2. Employees are not required to deposit their ID's with their employer and are free to leave their employer after reasonable notice.
3. During performed interviews, employees were favorable towards the company and it was confirmed during management and employee interviews.
4. Policy of freely chosen and employment procedure updated on 27/3/2025 were reviewed.
5. Work contracts were reviewed for all workers to ensure noticed periods; each worker receives a copy of signed contract by both parties.
6. Personal files were reviewed for workers to review the workers hiring documents (copy of birth certificate, copy of ID cards, copy of signed contract).
7. Worker's interview showed that overtime applied at this site is complying with the legal requirements.
8. The evidence examined during the audit:
 - Management interview.
 - Employees interviews.
 - Employees files
 - Site tour.

1. Employment is freely chosen

Data points

If required under local law, is there a published 'modern slavery' or similar statement?	Not Applicable
Does the site utilise any workers who are prisoners?	No
Does the site use the labour of persons required to work under any government scheme?	No

1.A. Responsible recruitment and entitlement to work

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended

Management systems

Explanation for management systems grades

1. Establish and maintain appropriate policies and procedures to ensure workplace requirements are met.

Reason for improvement: This recommendation indicates that the company has some policies related to responsible recruitment, but they are not fully comprehensive, clearly defined, or regularly updated. The lack of robust and detailed procedures means that the company is not consistently ensuring that employees are recruited responsibly, in accordance with legal and ethical standards. The company needs to establish stronger policies that cover all aspects of responsible recruitment, such as ensuring full verification of employees' rights at work and that employees are recruited without any form of coercion or deception.

Additionally, there are gaps in the company's procedures to ensure that employees are provided with clear, accurate, and accessible information about their terms, conditions, and rights of employment prior to employment.

2. Appoint a manager with sufficient seniority to be responsible for implementing the procedures.

Reason for improvement: The recommendation highlights the appointment of a manager with sufficient authority, but a lack of leadership and oversight at the senior management level in implementing and managing responsible recruitment practices. This indicates that the responsibility for ensuring that employees are recruited legally and transparently is not clearly defined and subject to sufficient oversight by a senior official.

Without a senior manager overseeing these processes, it is difficult to ensure that recruitment practices are applied consistently across the organization and in full compliance with legal and ethical requirements. A more experienced or senior person is required to ensure that recruitment policies are followed and continually improved.

3. Communicate and train employees and other personnel, including managers and supervisors, on relevant policies and procedures.

Reasons for Improvement: Effective communication and training are essential to ensure that all individuals involved in recruitment, particularly managers and supervisors, are familiar with responsible recruitment policies and procedures. The recommendation indicates that the company does not provide adequate and regular training to all employees involved in the recruitment process, which results in a lack of awareness among employees about the importance of responsible recruitment and the right to work.

The lack of ongoing training means that employees and managers do not fully understand their roles in preventing exploitation, fraud, or other forms of unethical recruitment. Regular and comprehensive training should ensure that all stakeholders understand the necessary procedures and their responsibilities related to recruitment and workers' rights.

4. Monitor the effectiveness of procedures to meet policy and work environment requirements

Reason for improvement: Even if responsible hiring policies and procedures are in place, the recommendation to monitor the effectiveness of these procedures indicates the need to improve the tracking, auditing, and evaluation of the company's hiring practices. The company does not fully assess the effectiveness of its hiring procedures in ensuring that all employees meet legal requirements and are hired fairly and ethically.

Summary of findings

[← Code area 1](#)

[Code area 2 →](#)

Code area	Workplace requirement	Area of NC	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>1. The Commercial Code of Conduct Policy (27-3-2025) includes the company commitment to comply with local law. The General Procedure for selection and hiring of jobs (27-3-2025) states the hiring and termination procedure and worker induction which includes the communication of policies and procedures.</p> <p>2. The company does not use agencies nor recruitment partners, all workers are hired directly by the company.</p> <p>3. During documents review, management interview and workers' interview there were all Egyptian and no migrant workers were observed in the site during the audit.</p> <p>4. During the documents review, it was evident that the site has analyzed the recruitment fees and related costs defined by the local law. The workers don't pay any fees for the recruitment and the facility is responsible for any recruitment fees.</p> <p>5. There is a Human Resources department, and a responsible HR manager.</p> <p>6. The evidence examined during the audit:</p> <ul style="list-style-type: none"> - Document review. - Employees interviews. - Management interviews. - Employees files. - Pay slips. 		

1.A. Responsible recruitment and entitlement to work

Data points

Labour hire

Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes?	Workers are recruited, selected, and hired directly by our company
How do the labour providers recruit and hire workers?	N/A - Recruitment providers not used
Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey?	0
Are there any subcontracted workers (excluding dispatched labour) on site?	No
Were all non-employee (e.g. agency or subcontracted) workers included within the scope of this audit for the purpose of document review and (if onsite on date of audit) interview?	Not Applicable
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Not Applicable

Migrant workers

Do any workers migrate across international borders to work at this site?	No
Percentage of workers that are migrant	0%
Do any workers migrate from other states, provinces or regions within the country to work at this site?	No

Recruitment fees

[← Code area 1.A](#)

[Code area 2 →](#)

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process? Not Applicable

Were recruitment fees or costs identified during worker interviews? No

No fees and costs paid by workers during the recruitment and employment process.

[← Code area 1.A](#)

[Code area 2 →](#)

2. Freedom of association and right to collective bargaining are respected

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended

Management systems

Explanation for management systems grades

Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met
Reason for improvement: The company has existing policies regarding freedom of association and collective bargaining; however, these policies are not sufficiently comprehensive, clearly defined, or consistently enforced. There is a need to develop detailed, transparent, and regularly updated policies that explicitly protect workers' rights to join unions or representative bodies and to engage in collective bargaining. Clear procedures must support the practical implementation of these rights across all levels of the organization.

Appoint a manager with sufficient seniority who is responsible for implementing procedures
Reason for improvement: There is currently no designated manager with the appropriate level of authority to oversee the implementation and enforcement of policies related to freedom of association and collective bargaining. This lack of leadership results in inconsistent application and inadequate protection of workers' rights. Assigning a senior manager with clear responsibilities will ensure accountability and consistent enforcement of these critical workplace rights.

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures
Reason for improvement: Communication and training efforts are not adequately informing employees and management about their rights and responsibilities concerning freedom of association and collective bargaining. Without proper training, workers may remain unaware of their rights, and supervisors may fail to uphold them. Regular, targeted training is essential to build awareness and ensure that everyone understands and supports the company's commitments in this area.

Monitor the effectiveness of procedures to meet policy and Workplace Requirements
Reason for improvement: The company is not sufficiently monitoring the implementation and impact of its policies related to freedom of association and collective bargaining. Without systematic evaluation, it is difficult to determine whether current procedures are effective in creating a workplace that fully respects these rights. Ongoing monitoring and periodic assessments are necessary to ensure continuous improvement and full compliance with internal policies and external requirements.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

[← Code area 1.A](#)

[Code area 3 →](#)

Systems and evidence examined to validate this code section

The company does not have workers' representatives or unions, but the company operates with an open door policy and does not mind establishing any workers' or union elections and has a strong system.

Evidence examined:

- The written complaints policy and the open door policy dated 27/3/2025 were reviewed.
- During the workers' interview, they stated that they had a positive attitude towards the company and did not file any complaints.
- Management interview.
- Site tour
- Employee interviews
- Management interviews
- Grievances and suggestions boxes.

2. Freedom of association and right to collective bargaining are respected

Data points

Are trade unions allowed by law in the national context?	Yes
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	Not Applicable
Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	Not Applicable
Are the worker representatives freely elected by the workforce as a whole?	Not Applicable
Does union/worker committee membership reflect the gender composition of the workforce?	Not Applicable
Does the membership reflect the nationality composition of the workforce?	Not Applicable
Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years?	No

[← Code area 2](#)

[Code area 3 →](#)

3. Working conditions are safe and hygienic

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required
Explanation for management systems grades	<p>Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met Reason for improvement: The company does not have fully comprehensive or clearly defined policies in place to ensure workplace safety and hygiene. Existing policies need to be expanded, clarified, and regularly updated to align with current safety standards and to address specific workplace risks. Clear and actionable procedures are necessary to maintain a safe and hygienic working environment for all employees.</p> <p>Appoint a manager with sufficient seniority who is responsible for implementing procedures Reason for improvement: The absence of a dedicated senior-level manager responsible for safety and hygiene indicates a lack of leadership and accountability in this area. While some safety measures exist, they are not being properly enforced or consistently implemented across all departments. Assigning a senior manager with clear authority will ensure effective oversight and consistent application of safety and hygiene protocols.</p> <p>Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures Reason for improvement: Communication and training on safety and hygiene policies are currently insufficient. Training sessions are not conducted regularly or thoroughly enough, and they do not adequately include all levels of staff. This results in gaps in knowledge and practice regarding safety protocols, proper use of equipment, and hygiene maintenance. Comprehensive and frequent training is essential to build a safety-conscious culture.</p> <p>Monitor the effectiveness of procedures to meet policy and Workplace Requirements Reason for improvement: Current findings in the workplace indicate that safety and hygiene procedures are not being effectively monitored. The company is not adequately assessing whether existing practices are achieving their intended outcomes. Ongoing monitoring and evaluation are required to identify areas for improvement, ensure compliance, and support a safe and healthy work environment and According to finding in Workplace .</p>

[← Code area 2](#)

[Code area 4 →](#)

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.N Maintain a log of all hazardous substance...	Local law Base code	NC ZAF-
Systems and evidence examined to validate this code section		<p>-The facility uses chemicals products for production, maintenance and cleaning. The chemicals are correctly stored , MSDS are available in the storage area</p> <p>-All electrical panels are properly identified.</p> <p>-Ventilation, temperature and lighting were adequate for the production processes.</p> <p>-The facility conducts evacuation drill every year. Last evacuation drill was performed on 27-3-2025 and the Last Risk Assessment in 27-3-2025.</p> <p>Machines are regularly maintained and operated in a safe manner. All machinery has the necessary protections and signaling to avoid accidents.</p> <p>Evidence examined:</p> <ul style="list-style-type: none"> -site tour -Policy (27-3-2025) -H&S Procedures -Management and employees interviews -Training records EX -Fire Fighting (24/5/2025) -ETI (25/5/2025) - first aid (26/5/2025) -Health and safety (27/5/2025) -Haygen (28/5/2025) -Handling of chemicals (29/5/2025) 	

Findings: non-compliances

ZAF-

Non-compliance

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.N Maintain a log of all hazardous substances (e.g. chemicals and pesticides) on site. Ensure that these are managed appropriately at all times in line with safety instructions, including storage, use and disposal.

Time given to resolve

60 days

Issue title

230 - No material safety data sheet (MSDS) obtained/available

Verification method

Desktop audit

Description

It was evident during the site tour that there is no material safety data sheet available for all chemicals to all workers in the Chemical warehouse

Area of non-compliance/non-conformance

Local law

Base code

Corrective and preventative actions

The site is recommended to provide material safety data sheet (MSDS) to all workers

Local law reference

In accordance to Egyptian Labor Law # 14/2025, Article (249) Article 249: The establishment and its branches are required to provide occupational safety and health measures and ensure a safe working environment in the workplace to prevent chemical hazards resulting from handling solid, liquid, and gaseous chemicals, with attention to the following: • Not exceeding the maximum permissible concentration for handling chemicals and carcinogenic materials to which workers are exposed. • Ensuring that the stock of hazardous chemicals does not exceed the threshold quantities for each substance. • Providing the necessary precautions to protect the establishment and workers when handling, transporting, storing, using hazardous chemicals, and disposing of their waste. • Keeping a paper or electronic record of hazardous chemicals in circulation, including all data related to each substance, to monitor workplace environmental pollutants to which workers are exposed, and to record hazardous materials and waste in accordance with the Waste Management Law (Law No. 202 of 2020). • Labeling all chemicals in use with information on their scientific and trade names, chemical composition, hazard levels, safety precautions, and emergency procedures. The establishment must obtain this information from the manufacturer or supplier when the chemicals are supplied. • Training workers on how to handle hazardous chemicals, carcinogenic materials, and informing them of the associated risks, safety measures, and preventive methods. • Adhering to exposure standards and threshold limits.

* PDF generated at 12:30 (UTC) on 09 Jul 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

[← Code area 3](#)

[Code area 4 →](#)

3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, senior manager or business owner Yes, qualified safety officer
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	Yes
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	Yes - The facility uses chemicals products for production, maintenance and cleaning. The chemicals are correctly stored in a segregated area and the eyes wash facility is placed. - Chemical products: detergent, alcohol, sodium hypochlorite, fungicide, wax, peracetic acid, glycol, ammonia, greases, lubricants, etc..
Who organises accommodation for workers?	The company owns or operates worker accommodation (onsite) Workers independently arrange their own accommodation
Who organises worker transportation between accommodation and worksite?	Site owned transport
Who organises worker transportation while at work?	Site owned transport
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	No During the site tour, it was evident that there is no structural additions has been made to the original.
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No
Does the site have a structural engineer evaluation?	No

[← Code area 3](#)

[Code area 4 →](#)

4. Child labour shall not be used

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met Reason for improvement: The company has policies in place to prevent child labor, but they are not fully comprehensive, clearly defined, or aligned with the latest regulations and best practices. The company must strengthen its policies to explicitly prohibit child labor at all levels of the supply chain, including recruitment, employment practices, and third-party contractors.</p> <p>Appoint a manager with sufficient seniority who is responsible for implementing procedures Reason for improvement: There is a lack of clear accountability and leadership at the senior level to ensure proper implementation of child labor prevention procedures. Without a dedicated senior manager overseeing these policies, enforcement becomes inconsistent, and the company lacks an effective system for monitoring and addressing potential violations.</p> <p>Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures Reason for improvement: Communication and training regarding child labor prevention policies are not being delivered effectively across all levels of the organization. Employees, managers, and supervisors must receive regular and thorough training to fully understand the company's zero-tolerance approach to child labor and their role in upholding it.</p> <p>Monitor the effectiveness of procedures to meet policy and Workplace Requirements Reason for improvement: Existing monitoring procedures are insufficient to reliably detect and prevent instances of child labor. The company must implement regular, systematic monitoring and evaluation to ensure child labor policies are being strictly followed and that the prevention mechanisms are working as intended.</p>

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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[← Code area 3](#)

[Code area 5 →](#)

No findings

Systems and evidence examined to validate this code section

1. The Child Labor Policy #EZ-2025-3 has been updated on 27/3/2025. It's reviewed during the audit and it was in compliance with the local law and code area requirements.
2. The site has checked workers original national ID cards at the time of interviewing and kept a copy in their personal files. During the audit it was noted that the age of the youngest worker is 24 years old and there were no concerns regarding child labor observed.
3. The evidence examined during the audit:
 - Personal files and age proof verification documents: Copy of birth certificate, Recent photo, Criminal Record, Educational certificate and Copy of National ID cards).
 - Training Records.
 - Management interviews.
 - Workers interviews.
 - The Document reference: Policy #EW-2025-3 was signed, acknowledged from HR and relevant departments.
 - Child Labor Policy (Dated 27/3/2025) #EZ-2025-3 . training attendance records, monitoring reports, and compliance audits.
 - Hiring Procedure.
 - Management team structure and roles.
 - Interview transcripts, notes, and recordings.
 - Copies of signed contracts, reviewed clauses, and legal compliance checks.
 - Application Form.
 - Child labor remediation plan.

[← Code area 3](#)

[Code area 5 →](#)

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	23%
Enter the legal age of employment	18
Enter the age of the youngest worker identified	24
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0.0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	Not Applicable

[← Code area 4](#)

[Code area 5 →](#)

5. Legal wages are paid

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met

Some Improvements Recommended

Appoint a manager with sufficient seniority who is responsible for implementing procedures

Some Improvements Recommended

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

Some Improvements Recommended

Monitor the effectiveness of procedures to meet policy and workplace requirements

Some Improvements Recommended

Explanation for management systems grades

Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met
Reason for improvement: The company has policies in place regarding wage payments, but they are not fully comprehensive or regularly updated to reflect changes in labor laws. Existing procedures do not sufficiently ensure that all workers are paid in accordance with legal requirements, including minimum wage, overtime, and benefits. Clear and updated procedures must be established to verify and document compliance with wage regulations.

Appoint a manager with sufficient seniority who is responsible for implementing procedures
Reason for improvement: There is no designated senior-level manager with the authority and responsibility to oversee wage payment processes. This lack of leadership results in inconsistent oversight and accountability. Assigning a senior manager will ensure proper implementation of wage policies and consistent compliance with legal standards across the organization.

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures
Reason for improvement: Communication and training efforts regarding wage policies are currently inadequate. Employees and management need to receive clear, thorough, and continuous training to fully understand wage regulations and their responsibilities in ensuring accurate and lawful wage payments.

Monitor the effectiveness of procedures to meet policy and Workplace Requirements
Reason for improvement: The company is not effectively monitoring its wage-related procedures to confirm compliance with legal standards. Regular and systematic monitoring is necessary to identify any discrepancies or violations, ensure timely and lawful payments, and maintain alignment with evolving wage laws and workplace requirements.

Summary of findings

[← Code area 4](#)

[Code area 5.A →](#)

Code area	Workplace requirement	Area of NC	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>1. The policy #ER-2025-3 and procedures updated on 27/3/2025. were reviewed.</p> <p>2. The site paid for overtime premiums as per the legal requirements as the following:</p> <ul style="list-style-type: none"> a. 135% of the basic wages for daylight overtime hours. b. 170% of the basic wages for night overtime hours. c. 200% of the basic wages for overtime hours on rest days. d. 300% of the basic wages for overtime hours on holidays. <p>3. The site pays sick leave, maternity leave and annual leave. During the audit, it was noted that there is no illegal or unauthorized deduction, and the facility complies with legal requirements for wages and benefits.</p> <p>4. The facility has designate HR Manager to be responsible person for implementing the procedure.</p> <p>5. The evidence examined during the audit:</p> <ul style="list-style-type: none"> - Payroll records of 10 sampled workers for June 2025 (Recent), May 2025 (Random) and April 2025(Peak) were reviewed during the audit. - Deduction and Incentive records. - Signed pay slips, bank transfer records, and cross-check with attendance logs. - Overtime and leave records. - Performance appraisal reports. - Management Interview. - Workers interview. - Training records. 		

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	Wages meet a living wage The legal minimum wage
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Only digital payments
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	Between 1 and 10%

Worker remuneration

Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers?	Other (provide details) Not Applicable, the facility pays overtime premiums as per Egyptian labor law # 14/ 2025, Article # 121 which required overtime fee as following: a.135% of the basic wages for day light overtime hours. b.170% of the basic wages for night overtime hours. c.200% of the basic wages for rest day overtime hours. d.300% of the basic wages for holidays overtime hours.
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Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Monthly	
Is actual wage data available on site for any of these options?	Monthly	
Maximum legal working hours	Max hours per day	8.0
	Max hours per week	48.0
	Max hours per month	192.0
Actual required working hours	Required hours per day	8.0
	Required hours per week	48.0
	Required hours per month	192.0

[← Code area 5](#)

[Code area 5.A →](#)

Maximum legal overtime hours	Max hours per day	2.0
	Max hours per week	12.0
	Max hours per month	48.0
Actual overtime hours	Max hours per day	2.0
	Max hours per week	12.0
	Max hours per month	48.0
Minimum legal wage	Min per hour	Non applicable
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	7000.0
Actual minimum wage	Actual per hour	Non applicable
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	7000.0
Minimum legal overtime wage	Min per hour	44.0
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum overtime wage	Actual per hour	44.0
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	Non applicable

Wage analysis

Number of workers' records checked	10
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Provide the date and details of the records	<p>Attendance records and payroll records for 10 sampled workers for June 2025 (Recent).</p> <p>Attendance records and payroll records for 10 sampled workers for May 2025 (Random).</p> <p>Attendance records and payroll records for 10 sampled workers for April 2025 (Peak) were reviewed during the audit.</p>
Are there different legal minimum/legally recognised CBAs wage grades?	No
For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?	Meets legal minimum
Indicate the breakdown of workforce per earnings	100 % of workforce earning the minimum legal wage.
Are there any bonus schemes used?	No
Were accurate records shown at the first request?	Yes
Were any inconsistencies found?	No

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		
Systems and evidence examined to validate this code section	<ol style="list-style-type: none"> The policy #EC-2025-3and procedures updated on 27/3/2025. were reviewed. The site paid for overtime premiums as per the legal requirements as the following: <ol style="list-style-type: none"> 135% of the basic wages for daylight overtime hours. 170% of the basic wages for night overtime hours. 200% of the basic wages for overtime hours on rest days. 300% of the basic wages for overtime hours on holidays. The site has Policy in Living wages on 27/3/2025 The site has designated the HR Manager to be responsible person for implementing the procedure. The evidence examined during the audit: <ul style="list-style-type: none"> - Payroll records of 10 sampled workers for June 2025 (Recent), May 2025 (Random) and April 2025 (Peak) were reviewed during the audit. - Deduction, Attendees and Incentive records. - Management Interview. - Worker's interview. - Training records. 		

6. Working hours are not excessive

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met Reason for improvement: The company has policies in place related to working hours, but they are not comprehensive or consistently enforced. Current policies do not fully address critical aspects such as overtime limits, mandatory rest periods, and work-life balance. Additionally, gaps exist in ensuring full compliance with local labor laws, particularly regarding the regulation and documentation of overtime. The company must strengthen and clarify its policies to provide clear guidelines and protections for all employees.</p> <p>Appoint a manager with sufficient seniority who is responsible for implementing procedures Reason for improvement: There is no designated senior-level individual with clear responsibility and authority to oversee the implementation and enforcement of working hours policies. This lack of accountability results in inconsistent practices and increases the risk of excessive working hours. A senior manager must be appointed to ensure compliance, oversee implementation, and manage continuous improvement in line with labor standards.</p> <p>Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures Reason for improvement: Training and communication related to working hours are currently inadequate. Employees, managers, and supervisors must receive regular and comprehensive training on legal requirements, internal policies, and the importance of maintaining balanced work schedules. Proper guidance is essential to ensure understanding of time-tracking, legal limits on hours worked, and the significance of rest and recovery periods.</p> <p>Monitor the effectiveness of procedures to meet policy and Workplace Requirements Reason for improvement: The company does not have an effective system in place to monitor the implementation of working hours policies. Without regular monitoring, it is not possible to detect excessive working hours, non-compliance with rest period requirements, or areas where policy enforcement is lacking. A robust monitoring framework is necessary to ensure compliance, identify trends, and take corrective actions when needed.</p>

[← Code area 5.A](#)

[Code area 7 →](#)

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>1. The working hours policy and procedures #ET-2025-3 on 27/3/2025 were reviewed.</p> <p>2. The site works 6 days a week from Saturday to Thursday and Friday is the weekly day off.</p> <p>3. All sampled workers rest 1 day per week and work for 6 days/week based on Egyptian labor law and the facility internal policy. All the workers are hired directly by the site and there are no agency workers in the site.</p> <p>4. During the workers' interview and documents review it was noted that overtime work is voluntary; information from workers' interviews coincides with time and payroll records. The sampled workers stated that they did not work overtime hours, and it was confirmed during the time records review.</p> <p>5. The facility has designated the HR Manager to be a responsible person for implementing and monitoring the procedure.</p> <p>6. The evidence examined during the audit:</p> <ul style="list-style-type: none"> - Hiring procedures 27/3/2025 was reviewed. - Policy was approved and signed from senior management. - Production output summaries, time-stamped records from monitoring systems, and supervisor records. - Attendance records and payroll records for June 2025 (Recent), May 2025 (Random) and April 2025 (Peak) were reviewed during the audit - Bank transfer confirmations for payroll disbursements matching payroll data. - Overtime calculations and approvals. - Leave records and corresponding payroll adjustments. - Legal compliance report confirming compliance with minimum wage and overtime pay regulations. - Demographics and job roles of workers interviewed to ensure diverse representation. - Workers' signed consent to participate in interviews and confidentiality agreements. - Interview with 10 workers. - Management interview. - Grievance and suggestion boxes. 		

[← Code area 5.A](#)

[Code area 7 →](#)

6. Working hours are not excessive

Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	135%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	Not Applicable, the facility pays overtime premiums as per Egyptian labor law # 14/ 2025, Article # 121 which required overtime fee as following: a.135% of the basic wages for day light overtime hours. b.170% of the basic wages for night overtime hours. c.200% of the basic wages for rest day overtime hours. d.300% of the basic wages for holidays overtime hours.
Excluding overtime, what are the regular working hours per week for workers at this site?	48.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	60.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	60.0
Maximum number of days worked without a day off in sample	6

[← Code area 6](#)

[Code area 7 →](#)

7. No discrimination is practiced

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met

Some Improvements Recommended

Appoint a manager with sufficient seniority who is responsible for implementing procedures

Some Improvements Recommended

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

Some Improvements Recommended

Monitor the effectiveness of procedures to meet policy and workplace requirements

Some Improvements Recommended

Explanation for management systems grades

Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met
Reason for improvement: The company has anti-discrimination policies in place, but they are not fully comprehensive, clearly defined, or regularly updated. Current policies do not sufficiently address all forms of discrimination, including those based on gender, race, ethnicity, age, disability, religion, and sexual orientation. The company must enhance its policies to ensure clear definitions, broad coverage, and consistent application throughout the workplace.

Appoint a manager with sufficient seniority who is responsible for implementing procedures
Reason for improvement: The company lacks a designated senior-level manager responsible for overseeing the implementation and enforcement of anti-discrimination policies. This absence of leadership limits the effectiveness of the policies and reduces accountability. Appointing a manager with sufficient authority is essential to ensure consistent enforcement and integration of anti-discrimination principles into daily operations.

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures
Reason for improvement: Current communication and training efforts related to anti-discrimination policies are not comprehensive or consistent. All employees, including managers and supervisors, must receive regular, thorough training to understand their rights and responsibilities and to apply anti-discrimination policies effectively. Ongoing training is necessary to build awareness and promote a respectful and inclusive workplace culture.

Monitor the effectiveness of procedures to meet policy and Workplace Requirements
Reason for improvement: The company does not adequately monitor or evaluate the effectiveness of its anti-discrimination procedures. Without proper monitoring, it is difficult to determine whether policies are being followed or if issues are being addressed appropriately. A structured monitoring system is required to assess implementation, identify gaps, and drive continuous improvement.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>1. The Commercial Code of Conduct Policy (27/3/2025) rejects any kind of discrimination. During the site tour and the interviews performed it was noted no evidence of 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. The records reviews do not show any documentation that could be considered as any kind of discrimination. Gender divisions do not exist in the site.</p> <p>2. The evidence examined during the audit:</p> <ul style="list-style-type: none"> - site tour. - Employees files. - Time records. - Interviews with employees and management. - Hiring and termination procedures. - Gender equity policy document # EY-2025 implemented and communicated to staff. <p>Supporting records: Training attendance logs for gender equity workshops. Additional evidence: Workforce demographics report showing balanced representation across departments.</p>		

7. No discrimination is practiced

Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)?	0%
Representation of women in managerial roles (ratio of women workers to women managers)	0%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	0%
Three most common nationalities in managerial and supervisory roles	Egyptian: 100%.

[← Code area 7](#)

[Code area 8 →](#)

8. Regular employment is provided

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met

Some Improvements Recommended

Appoint a manager with sufficient seniority who is responsible for implementing procedures

Some Improvements Recommended

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

Some Improvements Recommended

Monitor the effectiveness of procedures to meet policy and workplace requirements

Some Improvements Recommended

Explanation for management systems grades

Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met
Reason for improvement: The company has policies regarding employment contracts and conditions, but they do not fully address the need for regular and stable employment. Existing policies lack clarity and do not sufficiently cover the management of temporary or casual employment arrangements. Strengthening these policies is essential to ensure consistent, long-term employment and to reduce job insecurity for all workers.

Appoint a manager with sufficient seniority who is responsible for implementing procedures
Reason for improvement: The company does not have a designated senior-level manager responsible for overseeing regular employment practices. The absence of leadership in this area results in a lack of accountability and structure, making it difficult to ensure that employees receive stable, long-term contracts and are not placed on excessive short-term or non-regular employment arrangements.

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures
Reason for improvement: Communication and training regarding employment stability and contract terms are not comprehensive. All employees, managers, and supervisors must receive clear and consistent training to understand the company's policies on regular employment, the importance of job stability, and the rights of workers under applicable labor laws.

Monitor the effectiveness of procedures to meet policy and Workplace Requirements
Reason for improvement: The company lacks an effective system to monitor and evaluate its employment practices. Without regular monitoring, it is not possible to confirm that employment conditions align with company policy and legal standards. Implementing a monitoring process is necessary to ensure that all workers are provided with fair, regular, and stable employment.

Summary of findings

[← Code area 7](#)

[Code area 8.A →](#)

Code area	Workplace requirement	Area of NC	Finding
	No findings		
Systems and evidence examined to validate this code section	<ol style="list-style-type: none"> 1. The site employs its employees through a selection and interview mechanism, based on qualifications and ability. 2. The site has 6 permanent employees, while the rest are temporary employees. 3. All employees were directly employed by the site. 4. The obligations towards employees under labor laws and regulations or social security arising from the regular employment relationship were verified and adequately fulfilled. 5. The evidence examined during the audit: <ul style="list-style-type: none"> - Employee files (Employment contracts). - Personal identification documents. - Q2 insurance. - Latest insurance payment receipt. - Interviews with employees and management. 		

8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed	100.0%
Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment	0.0%
Percentage of workers employed as apprentices, trainees or interns	0.0%

8.A. Sub-contracting and homeworkers are used responsibly

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>The system developed for subcontracting and homeworker requirements is robust and supports sustainable long-term compliance. The company manages subcontracting and the use of homeworkers responsibly, effectively addressing key social risks such as exploitation and unsafe working conditions. Clear communication channels are in place to ensure that all involved parties—both internal and external—are informed about the company’s expectations and fair labor practices.</p> <p>Comprehensive monitoring systems are implemented to ensure that all subcontracted work adheres to the same ethical and labor standards as the company’s direct operations. These include the provision of fair wages, safe working environments, and strict prohibition of any form of exploitation. Training is provided to both subcontractors and internal staff to reinforce compliance with labor laws and to promote responsible sourcing.</p> <p>These initiatives reflect the company’s strong commitment to ethical business conduct and social responsibility. As a result, all workers—including remote and subcontracted workers—are treated with fairness, dignity, and respect. No breaches were identified in this area, further confirming the strength and sustainability of the systems in place.</p>

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

Systems and evidence examined to validate this code section

1. The employment policy and procedure which updated on 27/3/2025 were reviewed.
2. During the audit, there were no sub contracting or home workers hired by the site.
3. The evidence examined during the audit:
 - Site tour.
 - Workers interviews.
 - Interviews with employees and management.
 - Training records.

8.A. Sub-contracting and homeworkers are used responsibly

Data points

Are homeworkers employed directly or engaged through an agent? Not applicable

Gender disaggregated data available

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homeworker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers?

No

N/A. The site's service or product providers don't engage with sub-contracting / home workers.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity?

No

During the site walkthrough, workers' interview and management interview, it was evident that there were no subcontracting / home workers hired by the site.

Are any sub-contractors used?

No

9. No harsh or inhumane treatment is allowed

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met Reason for improvement: The company has policies in place to prevent harsh or inhumane treatment, but these policies are not fully comprehensive or effective in all areas. The current policies do not cover all forms of mistreatment, or there are gaps in the procedures for handling complaints, investigating incidents, or providing support to affected employees. Additionally, the procedures for ensuring workers feel safe reporting mistreatment or abuse are unclear.</p> <p>Appoint a manager with sufficient seniority who is responsible for implementing procedures Reason for improvement: The company has a manager responsible for these policies, but this manager does not have the necessary authority or resources to enforce anti-abuse policies effectively and ensure consistent implementation of related procedures. Without senior-level oversight, it is difficult to prioritize the prevention of harsh or inhumane treatment and ensure that employees trust the reporting and investigation systems in place.</p> <p>Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures Reason for improvement: The company does not provide comprehensive or regular training to ensure that employees, managers, and supervisors fully understand the company's policies on harsh or inhumane treatment. Without proper communication and training, employees may not know what constitutes mistreatment, how to report it, or how to seek support. Furthermore, managers and supervisors may not be adequately equipped to recognize or address potential cases of mistreatment.</p> <p>Monitor the effectiveness of procedures to meet policy and Workplace Requirements Reason for improvement: While the company has procedures for handling complaints and preventing mistreatment, these procedures are not monitored effectively or consistently. Without regular monitoring, it becomes difficult to identify patterns of mistreatment or evaluate whether employees feel comfortable reporting abuse or if the policies are being implemented as intended.</p>

[← Code area 8.A](#)

[Code area 10.A →](#)

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>1. The site has a suggestions and claims management procedure which updated on 27/3/2025 and it states that there is a suggestion box for employees to make suggestions or claims and a phone number and email for third parties. The suggestion box is opened on weekly basis, by administrative or human resources representative whit a worker, during the season and once a month out of season, the claims or requests are registered and treated. Employee feel free to speak directly to their supervisors or site managers.</p> <p>2. According to the facility tour and the document review it was found no evidence verified of any type of harsh or inhumane treatment. The working environment in the company seemed to be very good.</p> <p>3. The evidence examined during the audit:</p> <ul style="list-style-type: none"> - Social and Fair-Trade Policy (27/3/2025). - Suggestions and Claims Management Procedure (27/3/2025). -Policy regarding situations of sexual harassment (27/3/2025). - General procedure in situations of sexual harassment PRG (27/3/2025) - Claims and suggestion registers. - Employee interviews. -Management interviews. - Suggestion and grievance boxes. 		

9. No harsh or inhumane treatment is allowed

Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?	Yes, there is a formal grievance process The grievance process is available to all workers
What type of grievance mechanism(s) are available?	The facility has a grievance mechanism which allows all workers to freely communicate with the management through open-door policy and grievance box which are located near the toilets and dining area in order to report any situation or case related to human rights (working conditions). The HR Manager is in charge of checking the box on a weekly basis.
Number of grievances raised in the last 12 months	0
Number of grievances resolved in the last 12 months	0

[← Code area 9](#)

[Code area 10.A →](#)

10.A. Environment 2-Pillar

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>Develop and Maintain Relevant Policies and Procedures to Ensure Workplace Requirements are Met Reason for Improvement: The company has environmental policies in place, but these policies are not sufficiently comprehensive, updated, or effectively implemented. The policies lack clear definitions, measurable objectives, and targets to minimize environmental impact, and they do not address all key areas of environmental management. Additionally, the procedures for addressing environmental issues are inconsistent and incomplete across different areas of the organization.</p> <p>Appoint a Senior Manager with Sufficient Authority to Oversee Procedure Implementation Reason for Improvement: The company has environmental oversight, but it lacks a dedicated senior-level manager with the necessary authority and resources to ensure the effective implementation of environmental procedures. Without a senior leader responsible for enforcing and overseeing these policies, it is difficult to achieve significant progress in sustainability and environmental management.</p> <p>Communicate and Train Employees, Managers, and Supervisors on Relevant Policies and Procedures Reason for Improvement: The company has not provided sufficient communication and training to ensure that employees, managers, and supervisors are fully informed about environmental policies and their roles in implementing them. This results in a lack of understanding about the importance of environmental sustainability and the necessary actions to reduce environmental impact, leading to inconsistent practices and disengagement from staff.</p> <p>Monitor the Effectiveness of Procedures to Ensure Alignment with Policy and Workplace Requirements Reason for Improvement: The company has environmental procedures in place, but these procedures are not effectively monitored or evaluated to assess their success in meeting environmental objectives. Without proper monitoring systems, it is impossible to determine whether the procedures are achieving their intended outcomes, identify areas for improvement, or track progress towards sustainability goals.</p>

[← Code area 9](#)

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>1. The site has a Water use and Protection of Natural Resources Policy (27/3/2025), which states the site commitment to minimize environmental impact and pollution and care of the environment. The environmental policies communicated to all the relevant personnel such as workers, managers, supervisors, suppliers and customers were reviewed.</p> <p>2. The site has established and maintained environmental management system, which was updated on (27/3/2025) H&S Manager has trained all the workers and supervisors on Environmental hazards and waste management on (27/3/2025) .</p> <p>3. During the audit, it was evident the following:</p> <ul style="list-style-type: none"> - Special waste: stored and retired and treated by registered companies. - Discarding of fruit: is sold to other industries. - Bins: are fixed or sold as firewood. - Empty containers of agrochemicals: retired <p>4. The evidence examined during the audit:</p> <ul style="list-style-type: none"> - SAQ. - Water use and Protection of Natural Resources Policy (27/3/2025) - Certificates. - Management interview. - Workers interview. - Site tour. - Data of Waste Companies: Contracts Official licenses ,Waste disposal logs, types of waste handled, and disposal methods. 		

[← Code area 9](#)

10.A. Environment 2-Pillar

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?

No

Does the site have any valid environmental or energy management certificates?

none

Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC))?

No

Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?

No

[← Code area 10.A](#)

Attachments



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