



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC417756879	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS417935252	
Business name (Company name):	Green Hope for Agriculture development			
Site name:	Green Hope - Frozen Factory			
Site address:	Plot 6243-1-6th Industrial Zone, Sadat City, El Menofia, Egypt. Sadat City, El Menofia. 32897 EG	Country:	EG	
Site contact and job title:	Mr. Shrief Ismail / General Manager			
Site phone:	0020122632442	Site e-mail:	compliance@greenhope-eg.com	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar	<input type="checkbox"/> Business Ethics
Date of Audit:	2024-06-23			

Audit Company Name:
BCI Compliance Group Limited

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)			

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 (March 2019) 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.

Auditor Team			
Lead Auditor:	AbdAllah Mohamad	APSCA Number:	21701695
Additional Auditors:			
Date of declaration:	2024-06-23		

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.

Site Representation	
Full Name:	Mr. Shrief Ismail
Title:	General Manager
Date of declaration:	2024-06-23
Comments: <i>Any exceptions to this must be recorded here (e.g. different sample size): Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020). The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives</i>	
None.	

Summary of Findings

Issue <small>(please click on the issue title to go direct to the appropriate audit results by clause)</small>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
0A - Universal rights covering UNGP			0	0	0	
0B - Management systems and code implementation			0	0	0	
1 - Freely chosen employment			0	0	0	
2 - Freedom of association and right to collective bargaining are respected			0	0	0	
3 - Working conditions are safe and hygienic	3.1 3.1 3.1	§1 §2 §3	3	0	0	NC - ZAF600514535 NC - ZAF600514536 NC - ZAF600541819
4 - Child labour shall not be used			0	0	0	
5 - Living wages are paid			0	0	1	GE - ZAF600541818
6 - Working hours are not excessive			0	0	0	
7 - No discrimination is practiced			0	0	0	
8 - Regular employment is provided			0	0	0	
8A - Subcontracting and homeworking			0	0	0	
9 - No harsh or inhumane treatment is allowed			0	0	0	
10A - Entitlement to work and immigration			0	0	0	
10B2 - Environment 2-pillar			0	0	0	
10B4 - Environment 4-pillar			0	0	0	
10C - Business ethics 4-pillar			0	0	0	

Local Law Issues

Issue	Description
§1	In accordance to Egyptian Labor Law # 12/2003, article # 208 that the establishment and its branches shall provide the means of vocational safety and health and ensuring labour environment security in places of work by which to ensure protection from physical risks resulting in particular from static and dynamic electricity.
§2	In accordance to Egyptian Labour Law no. 12/2003, article # 214 that the establishment and its branches shall take the necessary precautions and conditions for protection from fire risks as determined by the concerned quarter at the Ministry of Interior, and according to the nature of the activity exercised by the establishment, and the physio-chemical properties of the materials used and produced, subject to the following:- A-All fire fighting and extinguishing equipment and tools being used shall conform to the Egyptian standard specifications. B-Developing the fire-fighting and protection equipment by using the latest methods, and providing alarm, early warning, cautioning, protective insulation, and automatic fire extinguishing equipment whenever necessary, according to the nature of the establishment and its activity.

§3	<p>In accordance to Egyptian labour law # 12/2003, article # 214 - The establishment and its branches shall take the necessary precautions and conditions for protection from fire risks as determined by the concerned quarter at the Ministry of Interior, and according to the nature of the activity exercised by the establishment, and the physio chemical properties of the materials used and produced, subject to the following:</p> <p>(A) All fire-fighting and extinguishing equipment and tools being used shall conform to the Egyptian standard specifications.</p> <p>(B) Developing the fire-fighting and protection equipment by using the latest methods, and providing alarm, early Warning, cautioning, protective. insulation, and, automatic fire extinguishing equipment whenever necessary, according to the nature of the establishment and its activity.</p>
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Site Details

Site Details		
Company Name	Green Hope for Agriculture development	
Site Name	Green Hope - Frozen Factory	
GPS location (if available)	GPS Address:	Plot 6243-1-6th Industrial Zone, Sadat City, El Menofia, Egypt.
	Coordinates:	30°24'24.0"N 30°35'13.0"E
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p>- Commercial ID#: 97958; the latest issue date was on October 10, 2021 / Permanent. - Industrial record#: 2011/1421102001031338; the latest issue date was on April 18, 2023 and will be expired on August 18, 2026. - Tax ID#: 234-900-059; the latest issue date was on September 5, 2023; will be expired on September 4, 2028.</p>	
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	The facility is specialized in the manufacturing of frozen fruits and vegetables.	
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>- Green Hope - Frozen Factory is located at Plot 6243-1-6th Industrial Zone, Sadat City, El Menofia, Egypt. The facility was established in 2010. Its ownership is a privately owned company. - The facility is specialized in the manufacturing of frozen fruits and vegetables. The main production processes are the following: Washing, Sorting, Blanching, IQF freezing for artichokes, peppers, green beans and broccoli, olives and strawberries and Packing in PET bags and cardboard boxes. - The facility's total land area is 6,681 sqm. The facility consists of 1 building. The building is 14 years old. -The facility has 2 production lines with a production capacity of 1,500 tons per month. -The main machine list is the following: IQF tunnel: 1/ Blanching machines: 2 / Metal detectors: 2 and 2 Cold stores. - The nearest hospital is (Sadat City hospital) which is 3 km from the facility. The nearest fire station is the industrial zone fire station which is 2 km away from the facility. - The facility has Fire Extinguishers: 30 / Fire Hose Reels: 13 / First Aid Box: 1 / Fire Assembly Points: 2 / Emergency Exits: 3 / Toilets: 13 (Male: 7 / Female: 6) and 1 Grievance box.</p>	

Structure and number of buildings	Building Name:		Building 1#:	
	Floor	Description	Remark	
	1F:	is for washing workshop, sorting workshop, blanching workshop, IQF freezing workshop, packing workshop, hand washing facility, toilets and packing materials warehouse and cold stores;.	None.	
	2F:	is for admin offices, meeting room, lockers room;	None.	
	3F:	is for admin offices and dining area.	None.	
Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: During the facility walkthrough, it was noted that there are no visible structural issues or cracks.			
Does the site have a structural engineer evaluation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: During the facility walkthrough and the documents review, it was noted that the building and safety inspection report was done by Engineering consultant office on January 22, 2024.			
Site function	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input 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			
Months of peak season	Select a month to Select a month			
Process overview	- The facility is specialized in the manufacturing of frozen fruits and vegetables. The main production processes are the following: Washing, Sorting, Blanching, IQF freezing for artichokes, peppers, green beans and broccoli, olives and strawberries and Packing in PET bags and cardboard boxes. - The facility has 2 production lines with a production capacity of 1,500 tons per month. -The main machine list is the following: IQF tunnel: 1/ Blanching machines: 2 / Metal detectors: 2 and 2 Cold stores.			
What form of worker representation is there on site?	<input type="checkbox"/> Union <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other <input type="checkbox"/> None			
Please give details:	The facility has 2 workers' representatives who were elected on March 1, 2023. The leader of workers' representatives is Mr. Mohamed. The workers' committee is managed by him. The committee's name: Green Hope Committee.			

Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are there any on site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Were all site provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A, there is no accommodation /dormitory provided for the workers by the facility.

Audit Parameters			
Time in and time out	Day 1		
	In	09:10	
	Out	17:45	
Audit type:	PERIODIC		
Was the audit announced?	ANNOUNCED		
Was the Sedex SAQ available for review?	Yes		
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No		
Who signed and agreed CAPR	Mr. Shrief Ismail / General Manager		
Is further information available	No		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
<i>Reason for absence at the opening meeting</i>	N/A, there is no union representative in the facility as this is not obligatory / requirement under local law.		
<i>Reason for absence during the audit</i>	N/A, there is no union representative in the facility as this is not obligatory / requirement under local law.		
<i>Reason for absence at the closing meeting</i>	N/A, there is no union representative 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	10	0	0	0	0	0	0	10
Worker numbers – female	30	0	0	0	0	0	0	30
Total	40	0	0	0	0	0	0	40
Number of Workers interviewed – male	4	0	0	0	0	0	0	4
Number of Workers interviewed – female	6	0	0	0	0	0	0	6
Total – interviewed sample size	10	0	0	0	0	0	0	10

Nationalities Structure		
Nationality of Management	Egyptian	
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1: Egyptian	approx %: 100%
Was this list completed during peak season?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A, there is no defined peak season for the production plan.	
Worker remuneration	Workers on piece rate:	0%
	Paid hourly:	0%
	Salaried:	100%
Payment cycle	Paid daily:	0%
	Paid weekly:	0%
	Paid monthly:	100%
	Other:	0%
	Details for other:	None.

Worker Interview Summary	
Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Number of group interviews:	4 workers x 1 group (4x1)
Number of individual interviews:	Male: 4 Female: 2
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
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
In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favorable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
What was the most common worker complaint?	There were no complaints raised by the interviewed workers. The worker interviews showed that workers have a positive attitude towards the facility, confirmed good working conditions, and stated that salaries are paid on time.
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 and the facility has provided the transportation, free meals, and medical care for all workers.
Any additional comment(s) regarding interviews:	The interviews were conducted in a private room. The workers were free to speak with the lead auditor and they seemed not to be coached by management.
Attitude of workers to hours worked:	All workers are satisfied with the working hours as well as the overtime hours.
Is there any worker survey information available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

Attitude of workers:

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

Attitude of worker's committee/union reps:

All workers' representatives had a positive attitude towards the lead auditor and towards the facility..

Attitude of managers:

The facility management was cooperative throughout the audit and had a positive attitude towards the lead auditor.

0A - Universal Rights covering UNGP
[Summary of Findings]

0A: Compliance Requirements

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:

1. The facility has implemented and maintained a system to be in compliance with the ETI Base Code requirements and this system was reviewed during the audit.
2. Human rights procedure was updated on January 1, 2024 and the policy was updated on January 1, 2024, which covers human rights impacts and issues. The HR and Admin Manager ensures that the policy is communicated to all appropriate parties, including its own suppliers, through sending the related policies and contracts to suppliers as legally required as well as through verbal communication over the phones.
3. The facility 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 facility has a grievance mechanism, which allows workers to use the grievance box (1 box) freely, and has workers' representatives to communicate with it for any complaints, in order to report any situation or case related to human rights (working conditions).
4. The facility has designated Mr. Sief / HR and Admin Manager to be the responsible person to deploy and communicate the human rights policy in the facility.

Evidence examined:

1. Human rights procedure was updated on January 1, 2024 and the policy was updated on January 1, 2024 to cover all the human rights impacts and issues and to keep the workers' information in their personal files on a confidentiality basis, and this information was reviewed during the audit.
2. The facility communicated the policy with its suppliers through sending the related policies and contracts to suppliers as legally required as well as through verbal communication over the phones.
3. The facility communicates the human rights policy with workers inside the workplace through verbal communication upon hiring (induction and refresher training).

Any other comments:

No Additional Comments.

Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility is committed to respecting human rights as it has a policy updated on January 1, 2024, covering all the human rights impacts and issues.	
Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: These policies are included in the workers' manual in their language and workers received awareness training program related to these policies.	
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: Mr. Sief / HR and Admin Manager.	
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 Please give details: The facility 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 facility has a grievance mechanism which allows workers to use the grievance box (1 box) freely and has workers' representatives to communicate with it for any complaints, in order to report any situation or case related to human rights (working conditions).	
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	
Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has a policy updated on January 1, 2024, stated that all the workers' information is kept in their personnel files and this information is confidential.	
Measuring Workplace Impact		
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))	Last year	0.0%
	This year	0.0%
Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	0.0%	

Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	Last year This year	0.0% 0.0%
Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month)	0.0%	
Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Accidents and injury records were updated on May 14, 2024 by Public Medical Insurance Authority, Menofia. The last updated injury records are the formal ones which are delivered to the legal social insurance office. During the documentary review, it was noted that there were no injuries at the facility.	
Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year This year	0.0% 0.0%
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)	0.0%	
Lost day work cases per 100 workers([(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	Last year This year	0.0% 0.0%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month 12 month	0.0% 0.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month 12 month	0.0% 0.0%

0B - Management Systems and code Implementation
[Summary of Findings]

0B: Compliance Requirements

- 0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.
0.B.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.
0.B.3 Suppliers are expected to communicate this Code to all employees.
0.B.4 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.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:

1. The facility has implemented and maintained a management system including policies and procedures to be in compliance with ETI Base Code requirements and this information was reviewed during the audit.
2. The facility has written policies and procedures related to legal requirements and ETI Base Code as well. It communicated the latest updates to workers verbally through induction/refresher trainings.
3. Mr. Sief / HR and Admin Manager is a responsible person for deploying, monitoring, and communicating the ETI Base Code principles in the facility.

Evidence examined:

1. Procedures and policies updated on January 1, 2024 were reviewed.
2. Declaration to appoint a management representative to be a responsible person for compliance with ETI Base Code was reviewed.
3. Workers interviews (10 workers).
4. Management interview.
5. Training records were reviewed.

Any other comments:

No Additional Comments.

Management Systems

In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?

☐ Yes ☒ No

Please give details:

The facility did not receive any fines or prosecutions for non-compliances to any regulations during the last 12 months.

Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?

☒ Yes ☐ No

Please give details:

The facility has well organized management procedures and policies, which were updated on January 1, 2024 and prohibited all kinds of forced labour, child labour, discrimination, harassment & abuse.

<p>If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>The facility has implemented effectively all procedures and policies, which were updated on January 1, 2024. All procedures are communicated to the workers in their languages, such as forced labour policies, child labour policies and nondiscrimination policies.</p> <p>Also, the facility conducted awareness training programs for all workers March 5, 2024 in separate sessions.</p> <p>Additionally, the facility has posted these policies on the announcement board.</p>
<p>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</p> <p>Please give details:</p> <p>During the facility walkthrough, the management interview, and the worker interviews, it was noted that ETI base code was communicated to all workers, supervisors, and managers.</p> <p>The facility has posted the code on the announcement board.</p> <p>Last training on the code was conducted on March 5, 2024 in separate sessions.</p>
<p>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</p> <p>Please give details:</p> <p>During the worker interviews, it was noted that workers are aware of the facility's policies and procedures and that the facility provides managers and workers with related awareness training programs, which uses the legal requirements and SEDEX guidelines as training material (as reference).</p>
<p>Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility doesn't have internationally recognized system certifications but the facility is BRC certified: BRC site code # 1475206; issued on January 2, 2024 and will be expired on December 27, 2024.</p>
<p>Is there a Human Resources manager/department?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Mr. Sief / HR and Admin Manager is a responsible person for deploying, monitoring and communicating HR procedure at the facility.</p>
<p>Is there a senior person /manager responsible for implementation of the code?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Mr. Sief / HR and Admin Manager is a responsible person for implementing the code.</p>
<p>Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Mr. Sief / HR Manager is a responsible person for implementing HR procedure to keep all the hiring documents and related workers' information in personal files kept in a safe place.</p>

Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has a policy, which was updated on January 1, 2024, stated that all the workers' information is kept in their personnel files at the human resource dept, and this information is confidential.
Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility conducts annual risk assessments to cover the human rights elements and the updates for all its policies and procedures to check its effectiveness and the last risk assessment was updated on January 1, 2024.
Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has processes to do a remediation plan and corrective actions towards any issues raised during the risk assessment process.
Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has a policy updated on January 1, 2024, which is communicated with its suppliers through sending them the related policies and contracts as legally required as well as through verbal communication over the phone.
Land Rights	
Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility is owned by the facility owner and he has all the land rights. Also, the facility has a valid and updated land rights license.
Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has a periodic check from local authorities in order to renew all legal permits and licenses. The facility has all required land rights and permissions as follows: - Commercial ID#: 97958; the latest issue date was on October 10, 2021 / Permanent. - Industrial record#: 2011/1421102001031338; the latest issue date was on April 18, 2023 and will be expired on August 18, 2026. - Tax ID#: 234-900-059; the latest issue date was on September 5, 2023; will be expired on September 4, 2028.
Does the site have a written policy and procedures specific to land rights?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not Applicable, the facility doesn't have a policy and procedures including any due diligence to obtain free, prior, and informed consent (FPIC).

Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The facility is owned by the facility owner and he has all the land rights. There is no compensation for the land prior to being built or expanded.
Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: As mentioned above.
Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: As mentioned above.

1 - Freely chosen Employment

[Summary of Findings]

1: Compliance Requirements

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:

1. The facility has updated written policy and procedure on January 1, 2024 to be in compliance with the Egyptian labour law and ETI base code requirements.

2. The facility interviewed workers through the HR manager and filling application form.

3. The sampled workers stated that they are free to leave the workplace after reasonable notice. During the facility walkthrough, it was noted that all the doors were unlocked.

4. Mr. Sief / HR and Admin Manager implements HR procedure to check the workers' original documents upon hiring and keeps copies of all these documents and related workers' information in their personal files. During the documentary review, it was noted that no deposits are required, no personal documents are retained.

5. During the facility walkthrough it was noted that there were no concerns regarding forced labour, migrant workers observed, and it was confirmed during the worker interviews.

Evidence examined:

1. Policy of freely chosen and employment procedure updated on January 1, 2024 were reviewed.

2. Work contracts were reviewed for all workers to ensure noticed periods; each worker receives a copy of signed contract by both parties.

3. Personal files were reviewed, including the worker hiring documents (copy of birth certificate, copy of ID cards, copy of signed contract).

4. Workers interview showed that overtime applied at this facility is complying with the legal requirements.

5. Management interview.

Any other comments:

No Additional Comments.

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)

☐ Yes ☒ No

Please give details:

Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)

☐ Yes ☒ No

Please give details:

Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)

☐ Yes ☒ No

Please give details:

Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No such case was found during the workers interviews, as the workers are free to terminate their work contracts with reasonable notice and time.
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 Please give details: Not applicable.
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 Please give details: No such case was found during the worker interviews, as the workers are free to leave the facility at the end of the workday.
Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Please give details: The facility understands the risks of the forced / trafficked / bonded labour in its supply chain as the management and the workers are aware of ETI Base Code principles.
Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility interviewed workers through interviewing with Mr. Sief / HR and Admin Manager, filling application forms by themselves, and signed the labour contracts.

2 - Freedom of Association and Right to Collective Bargaining are Respected [Summary of Findings]

2: Compliance Requirements

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:

1. The facility had updated written policies and procedures on January 1, 2024, which is in compliance with the legal law.

2. The facility doesn't have a trade union but the workers had 2 workers representatives who were elected on March 1, 2023. The leader of workers' representatives is Mr. Mohamed. The workers' committee is managed by him. The workers' representatives communicated with the top management through conducting periodic meetings. The last meeting was on May 30, 2024.

3. During the workers interview it was noted that the above mechanism is included in the open door policy and grievance policy and that workers can freely use these two communication methods.

Evidence examined:

1. Written grievance policy and open-door policy updated on January 1, 2024, were reviewed.

2. During the workers' interview, they stated that they have a positive attitude towards the facility and there were no complaints raised by them.

3. Management interview.

4. Minutes of meetings between the top management and workers' representatives.

Any other comments:

No Additional Comments.

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	<input type="checkbox"/> Union <input type="checkbox"/> Other	<input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> None
Other details:	The facility has 2 workers' representatives who were elected on March 1, 2023. The leader of workers' representatives is Mr. Mohamed. The workers' committee is managed by him. The committee's name: Green Hope Committee.	
Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All the workers can communicate with the management through grievance box (1 box), which is located near the toilets and dining area for any complaints/ suggestions. The facility also has an open-door policy, which allows all the workers to talk to the management freely.
Is there evidence of free elections?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There was a room available for the workers' committee to meet and they were allowed 2 hours per month for a meeting.
Name of union and union representative, if applicable:	N/A, there is no union or union representative in the facility.
Is there evidence of free elections?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	The facility has 2 workers' representatives who were elected on March 1, 2023. The leader of workers' representatives is Mr. Mohamed. The workers' committee is managed by him. The committee's name: Green Hope Committee.
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: During the worker interview it was noted that all workers know their representatives, know their roles, and prefer to talk with the lead worker representative directly.
Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date of last election:	2023-03-01
Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, please state how many:	1.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	The workers' committee communicates with the top management through conducting periodic meetings. The last meeting was held on May 30, 2024 and it took 60 minutes. The agenda was about the eating area and space. The outcome of this meeting was shared with workers through announcement boards and workers' representatives.
Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

3 - Working Conditions are Safe and Hygienic [Summary of Findings]

3: Compliance Requirements

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:

1. The facility provides a safe and hygienic working environment according to the last risk assessment plan which was established on January 1, 2024, has the hazard identification procedure which was updated on January 1, 2024, and has checked health & safety records such as emergency preparedness and response procedure and health & safety work instructions.

2. Health & safety policy and procedures were updated on January 1, 2024. Procedures such as the emergency preparedness and response procedure, health & safety work instructions, accident & emergency work instruction, and all these policies were reviewed.

3. The facility has provided clean toilet facilities and potable water and has provided sanitary facilities for food storage.

4. The last training courses which were held in the facility are as the follows:

* HSE Awareness training was done internally on February 5, 2024 by Mr. Mohamed / HSE Manager.

* First Aid awareness training was done internally on March 10, 2024 by Mr. Mohamed / HSE Manager.

* Fire-fighting training was done internally on April 7, 2024 by Mr. Mohamed / HSE Manager.

5. The last fire drill was done on June 3, 2024 with evacuation time (2 minutes) and the next one is planned to conduct in December 2024.

6. The facility has designated Mr. Mohamed / HSE Manager as a responsible person for Health & Safety issues.


Evidence examined:

1. Health, safety and hygiene procedures and policies updated on January 1, 2024 were reviewed.
2. Safety, hygiene, electric, temperature hazards were identified.
3. Facility walkthrough.
4. Management interview.
5. Workers interviews (10 workers).
6. Documents and records were reviewed during the audit: * Risks and hazards analysis report was done on January 1, 2024. * Last Regular medical check was done on March 20, 2024 by Public Medical Insurance / Menofia City. * Last updated Injuries and accidents log was done on May 14, 2024 by Public Medical Insurance Authority, Menofia. * Last updated / approved Emergency response plan was done on January 1, 2024. * Last check for fire extinguishers and firefighting systems was done by Engineering company; the contract was issued on August 1, 2023 and it's automatically renewed and the last check was done on June 4, 2024. * H&S committee consists of 12 members (Formation decree was updated on May 16, 2024); the last two meetings were on May 8, 2024 and June 12, 2024. * Electrical safety inspection report was done by Electrical consultations on January 18, 2024. * Building and safety inspection report was done by Engineering consultant office on January 22, 2024.
Any other comments:
No Additional Comments.


Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has general health & safety policies and procedures, which are fit for purpose and these policies and are communicated with the workers in their language through posting on the announcement board.
Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: These policies are included in the workers' manual in their language and workers received awareness training program related to these policies.
Are there any structural additions without required permits/inspections (e.g. floors added)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: As observed during the facility walkthrough, there is no addition been made to the original structure.
Are visitors to the site informed on H&S and provided with personal protective equipment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility displays H&S instructions posters at the main gate and at prominent places. As per the norm of production processes inside the facility, PPE is required to be worn during the walkthrough.

Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The facility doesn't have an on-site clinic room but they contracted with a nurse and a doctor to visit the facility on a daily basis. 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 factory, charge a doctor to visit them at the place provided by the factory for that purpose, and given them the medicines necessary for treatment free of charge. Also, the nearest hospital is (Sadat City Hospital) which is 3 km from the facility.
Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has trained first-aiders (2 first-aiders) and accessible first-aid boxes (1 box).
Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: During the worker interview, it was noted that workers confirmed their satisfaction concerning the transportation which they found safe, suitable, and maintained. Also, they stated that no smoking is permitted on the buses.
Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A. There was no dormitory provided for the workers.
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The last H&S risk assessment was done on January 1, 2024, which covered all the processes and hazards in place. No fatal or dangerous risk has been identified in the last risk assessment in the facility.


<p>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</p> <p>Please give details:</p> <p>- Environmental measurements report was done by Environmental Service Center / Sadat University on February 13, 2024. It's in compliance with the legal obligations on environmental requirements.</p> <p>- Solid wastes are disposed by Hi Tech Engineering Company on a monthly basis; the contract was issued on January 1, 2023 and it's automatically renewed. The last consignment was on May 22, 2024. Medical wastes are disposed by the local municipality in Menofia Governorate; the contract was issued on June 6, 2023 and it's automatically renewed. The last consignment was on June 11, 2024.</p>
<p>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</p> <p>Please give details:</p> <p>N/A, 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		Evidence																																			
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<table><tr><th colspan="2">Non-Compliance</th></tr><tr><td>Status</td><td>CLOSED</td></tr><tr><td>Reference</td><td>ZAF600514535</td></tr><tr><td>Clause</td><td>3 - Working Conditions are Safe and Hygienic</td></tr><tr><td>Issue Title</td><td>224 - Isolated occurrence of incorrect / damaged insulation in electricals including burnt / damaged wiring and plugs</td></tr><tr><td>Subcategory</td><td>Electrical risk</td></tr><tr><td>New or carried over?</td><td><input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over</td></tr><tr><td>Raised by audit</td><td>ZAA600021425</td></tr><tr><td>Resolved by audit</td><td>ZAA600071806</td></tr><tr><td>Root cause</td><td><input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other</td></tr><tr><td>Root cause - Other</td><td></td></tr><tr><td>Local law issue</td><td>In accordance to Egyptian Labor Law # 12/2003, article # 208 that the establishment and its branches shall provide the means of vocational safety and health and ensuring labour environment security in places of work by which to ensure protection from physical risks resulting in particular from static and dynamic electricity.</td></tr><tr><td>ETI code</td><td>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.</td></tr><tr><td>Explanation to the non compliance</td><td>During the facility walkthrough, it was evident that the electrical panel in the production floor was opened and was not provided with the proper locking device.</td></tr><tr><td>Follow up method</td><td><input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit</td></tr><tr><td>Timescale</td><td><input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other</td></tr><tr><td>Actions</td><td>It's recommended that the facility shall close all the</td></tr></table>			Non-Compliance		Status	CLOSED	Reference	ZAF600514535	Clause	3 - Working Conditions are Safe and Hygienic	Issue Title	224 - Isolated occurrence of incorrect / damaged insulation in electricals including burnt / damaged wiring and plugs	Subcategory	Electrical risk	New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	Raised by audit	ZAA600021425	Resolved by audit	ZAA600071806	Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	Root cause - Other		Local law issue	In accordance to Egyptian Labor Law # 12/2003, article # 208 that the establishment and its branches shall provide the means of vocational safety and health and ensuring labour environment security in places of work by which to ensure protection from physical risks resulting in particular from static and dynamic electricity.	ETI code	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.	Explanation to the non compliance	During the facility walkthrough, it was evident that the electrical panel in the production floor was opened and was not provided with the proper locking device.	Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	Actions	It's recommended that the facility shall close all the	<div><p>NC 01 - The electrical panel in the production floor was opened and was not provided with the proper locking device..jpg</p></div>
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	electrical panels and provide them with the proper locking devices.	
Additional comments	The finding is still open as there is no corrective action taken from the facility' side. There is no action taken During the facility walkthrough, it was evident the facility has closed the electrical panel in the production floor and equipped it with the locking device. None.	

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Explanation to the non compliance	During the site walkthrough, it was evident that one fire extinguisher in the production floor was placed on the floor.																														

Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other
Actions	It's recommended that the facility shall install all the fire extinguishers on the suitable height.
Additional comments	During the facility walkthrough, it was evident the facility has installed the fire extinguishers on suitable height. None.

Non-Compliance		Evidence																												
[Back to findings summary]																														
<table><tr><th colspan="2">Non-Compliance</th></tr><tr><td>Status</td><td>OPEN</td></tr><tr><td>Reference</td><td>ZAF600541819</td></tr><tr><td>Clause</td><td>3 - Working Conditions are Safe and Hygienic</td></tr><tr><td>Issue Title</td><td>187 - Fire extinguishers not inspected / checked regularly / out of date</td></tr><tr><td>Subcategory</td><td>Fire Safety - Fire Fighting Equipment</td></tr><tr><td>New or carried over?</td><td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td></tr><tr><td>Root cause</td><td><input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other</td></tr><tr><td>Root cause - Other</td><td></td></tr><tr><td>Local law issue</td><td>In accordance to Egyptian labour law # 12/2003, article # 214 - The establishment and its branches shall take the necessary precautions and conditions for protection from fire risks as determined by the concerned quarter at the Ministry of Interior, and according to the nature of the activity exercised by the establishment, and the physio chemical properties of the materials used and produced, subject to the following: (A) All fire-fighting and extinguishing equipment and tools being used shall conform to the Egyptian standard specifications. (B) Developing the fire-fighting and protection equipment by using the latest methods, and providing alarm, early Warning, cautioning, protective. insulation, and, automatic fire extinguishing equipment whenever necessary, according to the nature of the establishment and its activity.</td></tr><tr><td>ETI code</td><td>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.</td></tr><tr><td>Explanation to the non compliance</td><td>During the facility walkthrough, it was evident that one fire extinguisher was blocked by some drums in the washing workshop.</td></tr><tr><td>Follow up method</td><td><input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit</td></tr><tr><td>Timescale</td><td><input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days</td></tr></table>		Non-Compliance		Status	OPEN	Reference	ZAF600541819	Clause	3 - Working Conditions are Safe and Hygienic	Issue Title	187 - Fire extinguishers not inspected / checked regularly / out of date	Subcategory	Fire Safety - Fire Fighting Equipment	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	Root cause - Other		Local law issue	In accordance to Egyptian labour law # 12/2003, article # 214 - The establishment and its branches shall take the necessary precautions and conditions for protection from fire risks as determined by the concerned quarter at the Ministry of Interior, and according to the nature of the activity exercised by the establishment, and the physio chemical properties of the materials used and produced, subject to the following: (A) All fire-fighting and extinguishing equipment and tools being used shall conform to the Egyptian standard specifications. (B) Developing the fire-fighting and protection equipment by using the latest methods, and providing alarm, early Warning, cautioning, protective. insulation, and, automatic fire extinguishing equipment whenever necessary, according to the nature of the establishment and its activity.	ETI code	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.	Explanation to the non compliance	During the facility walkthrough, it was evident that one fire extinguisher was blocked by some drums in the washing workshop.	Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days	<div><p>NC 01- One fire extinguisher was blocked by some drums in the washing workshop..jpg</p></div>
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Actions	It's recommended that the facility shall remove the drums away from under the fire extinguisher to be easily accessible in case of any urgent cases and check the fire extinguishers on a regular basis.	

4 - Child Labour Shall Not Be Used [Summary of Findings]

4: Compliance Requirements

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:

1. Employment procedure updated on January 1, 2024 includes a commitment that the facility would never employ and use child labour under the minimum legal age of 18 years old. All workers are hired directly; age verification was conducted during the personal files' review.

2. The facility has checked workers' original national ID cards at the time of interviewing and kept a copy in their personal files.

3. Personal files and age proof verification documents were reviewed and included the follows:

- Copy of birth certificate.
- Recent photo.
- Criminal Record.
- Educational Background.
- Copy of National ID cards.

4. The national ID cards include workers' names, resident addresses and dates of birth.

5. During the audit it was noted that the age of the youngest worker is 20 years old. During the facility walkthrough, there were no concerns regarding child labour observed.

Evidence examined:

1. Employment procedure updated on January 1, 2024 and child labour policy updated on January 1, 2024 were reviewed.

2. Management interview.

3. Workers interviews (10 workers).

4. Documents and records were checked as follows:

- Personal files for all workers.
- Copies of birthday certificates for workers.
- Recent photos.
- Criminal Records.
- Educational Background records.

Any other comments:

No Additional Comments.

Legal age of employment:	18
Age of youngest worker found:	20
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

Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A, there are no workers under the age of 18.

5 - Living Wages are Paid [Summary of Findings]

5: Compliance Requirements

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:

1. The facility pays sick leave, maternity leave and annual leave.

2. Procedure and policy indicated that the facility paid for overtime premiums as per the legal requirements as the following:

- 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.

3. Workers' basic wages were paid based on the local minimum wage standard of 3,000 EGP / Month from July 2023; The local minimum wage standard of 3,500 EGP / Month from January 2024 and starting from June 2024, the local minimum wage standard of 6,000 EGP / Month. During the audit it was noted that the minimum salary in this facility was 3,100 EGP / Month for December 2023, 3500 EGP / Month for March 2024 and 6000 EGP / Month for May 2024.

4. All workers were provided with written and understandable information about their work condition in respect of wages before they entered the work and about the particulars of their wages for the pay period concerned every time that they were paid.

5. Payroll records for December 2023 (Off Peak), March 2024 (Off Peak) and May 2024 (Recent) were reviewed during the audit.

6. During the audit, it was noted that there is no illegal or unauthorized deduction.

Evidence examined:

1. Employment procedure updated on January 1, 2024 was reviewed.

2. The facility complies with legal requirements for wages and benefits, the following documents & records were checked.

- a. Payroll records of 10 sampled workers for December 2023 (Off Peak), March 2024 (Off Peak) and May 2024 (Recent) were reviewed during the audit.
- b. Deduction records.
- c. Attendees records.
- d. Incentive records.

Any other comments:

No Additional Comments.

Summary Information

Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 48.0 Per Month: 192.0	Actual Per Day: 8.0 Per Week: 48.0 Per Month: 192.0	NO
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 2.0 Per Week: 12.0 Per Month: 48.0	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 0.0	NO
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: 3500	Actual Per Day: 250 Per Week: 1500 Per Month: 6000	NO
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: null	Actual Per Day: 0 Per Week: 0 Per Month: 0	NO
Wages Analysis:			
Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Sample Size Checked (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)	Attendance records and payroll records for 10 sampled workers for December 2023 (Off Peak). Attendance records and payroll records for 10 sampled workers for March 2024 (Off Peak). Attendance records and payroll records for 10 sampled workers for May 2024 (Recent) were reviewed during the audit.		
Are there different legal minimum wage grades? If Yes, please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
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"/> Not Applicable Please give details:		
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		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	3,100 EGP/Month for December 2023, 3500 EGP/Month for March 2024 and 6000 EGP/Month for May 2024.		
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 0.0% of workforce earning minimum wage 100.0% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	Bonus Scheme found:N/A. Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.		
What deductions are required by law e.g. social insurance? Please state all types:	Social security insurance and taxes.		

Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Please list all deductions that have been made.	1. Social Security insurance. 2. Taxes.
Please list all deductions that have not been made.	N/A.
Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All the working hours are recorded in the time records.
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
If yes, what was the calculation method used.	<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"/> Fairtrade Foundation <input type="checkbox"/> Other – please give details:
Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility is committed with Egyptian Local Law # 12/2003, Article #3; there shall be reviewed 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, the facility will be fined.
Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Through the facility rules review, payroll records review and workers' interview, we confirmed that rates are being paid to equal work.
How are workers paid:	<input checked="" type="checkbox"/> Cash <input type="checkbox"/> Cheque <input type="checkbox"/> Bank Transfer <input type="checkbox"/> Other

Good Example		Evidence																		
[Back to findings summary]																				
<table><tr><th colspan="2">Good Example</th></tr><tr><td>Status</td><td>OPEN</td></tr><tr><td>Reference</td><td>ZAF600541818</td></tr><tr><td>Clause</td><td>5 - Living Wages are Paid</td></tr><tr><td>Issue Title</td><td>453 - All workers receive wages well above the legal minimums</td></tr><tr><td>Subcategory</td><td>Payment of Wages</td></tr><tr><td>New or carried over?</td><td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td></tr><tr><td>Explanation to the good example</td><td>During the workers' interview and document review, it was evident that all the workers receive their wages well above the legal minimums.</td></tr><tr><td>Evidence</td><td>Workers' Interview and Document Review.</td></tr></table>		Good Example		Status	OPEN	Reference	ZAF600541818	Clause	5 - Living Wages are Paid	Issue Title	453 - All workers receive wages well above the legal minimums	Subcategory	Payment of Wages	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Explanation to the good example	During the workers' interview and document review, it was evident that all the workers receive their wages well above the legal minimums.	Evidence	Workers' Interview and Document Review.	
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Evidence	Workers' Interview and Document Review.																			

6 - Working Hours are not Excessive [Summary of Findings]

6: Compliance Requirements

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:

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:

1. The facility works 6 days a week from (Saturday to Thursday) and Friday is the weekly day off. The facility works in one shift starting from 08:00 to 16:00 with one hour break from 12:00 to 13:00.

2. All sampled workers rest 1 day per week and work for 6 days / week based on Egyptian labour law.

3. All the workers are hired directly by the facility and there are no agency workers in the facility.

4. During the worker interview and documents review it was noted that overtime work is voluntary; information from worker 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.

5. The facility uses the finger print scanners to record the working hours. The attendance records for 10 sampled workers for December 2023 (Off Peak), March 2024 (Off Peak) and May 2024 (Recent) were reviewed during the audit. During the documentary review, there were no concerns regarding the working hours observed.

Evidence examined:

1. The employment procedure updated on January 1, 2024 was reviewed.

2. Documents and records review included attended sheet and production records.

3. Attendance records and payroll records for December 2023 (Off Peak), March 2024 (Off Peak) and May 2024 (Recent) were reviewed during the audit.

4. Interview with 10 workers.

Any other comments:

No Additional Comments.

Working hours' analysis

Systems & Processes

What timekeeping systems are used?	Finger Print Scanners.
------------------------------------	------------------------

Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:		
Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input checked="" type="checkbox"/> 1 in 7 days	<input type="checkbox"/> 2 in 14 days	<input type="checkbox"/> No (please explain)
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		
Standard/Contracted Hours worked			
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No % of workers: null% Frequency:		
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Overtime Hours worked			
Actual overtime hours worked in sample (State per day/week/month)	Highest Overtime Hours: - 10 out of 10 samples from most current month of May 2024 (Recent): •Daily OT: Max. 0 hour. •Weekly OT: Max. 0 hour. •Monthly OT: Max. 0 hour. - 10 out of 10 samples from December 2023 (Off Peak month):- •Daily OT: Max. 0 hour. •Weekly OT: Max. 0 hour. •Monthly OT: Max. 0 hour. -10 out of 10 samples from March 2024 (Off Peak month):- •Daily OT: Max. 0 hour. •Weekly OT: Max. 0 hour. •Monthly OT: Max. 0 hour.		

Combined hours (standard or contracted + overtime hours = total) over 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A.
Approximate percentage of total workers on highest overtime hours:	0.0%
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information Please give details: We verified during the documents review that this is mentioned in the workers' handbook, internal policies and was confirmed during the workers' interviews as well.
Overtime premium	
Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium Please give details: The facility pays overtime premiums as per Egyptian labour law # 12/ 2003, Article # 85 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.
Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 100% workers on a monthly basis.
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 type="checkbox"/> No <input type="checkbox"/> Consolidated pay <input type="checkbox"/> Collective Bargaining agreements <input checked="" type="checkbox"/> Other
Please give details	The facility pays overtime premiums as per Egyptian labour law # 12/ 2003, Article # 85 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.
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other)	<input checked="" type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week is voluntary <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify)
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	The workers don't work more than 48 hours / week as mentioned in the time records.
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
--	---

7 - No Discrimination is Practiced [Summary of Findings]

7: Compliance Requirements

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:

1. During the management interviews, the workers interviews, and the documents review, it was noted that there was no discrimination on hiring, compensation, promotion, termination or retirement and access to training.

2. The facility provided the same payment for workers from the same category and experience.

Evidence examined:

1. Employment procedure updated on January 1, 2024 was reviewed.

2. Management interview.

3. Workers interview (10 workers).

4. Documents and records were reviewed as follows:

a. Application form.

b. Grievance and suggestion box (1 box).

Any other comments:

No Additional Comments.

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 65.0%			Female: 35.0%		
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	N/A, there are no women who are in skilled or technical roles.					
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	
Please give details	N/A, there is no evidence of discrimination found.					
Professional Development						
What type of training and development are available for workers?	N/A, there is no professional training available to the workers.					
Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No					

8 - Regular Employment Is Provided [Summary of Findings]

8: Compliance Requirements

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:

1. Work performed was on the basis of recognized work relationship established through Egyptian labour law and practice.

2. The labour contracts are signed by sides, the employer and the worker (on the first day of work).

3. There were no home workers.

Evidence examined:

1. Policy and procedure updated on January 1, 2024 were reviewed.

2. Management interview.

3. Workers interviews (10 workers).

4. Documents and records were reviewed as following:

a. Payroll records were reviewed.

b. Based on the labour contract, all the workers are covered with social insurance.

c. Labour contracts are matching with the legal requirements that were reviewed.

Any other comments:

No Additional Comments.

Responsible Recruitment

All Workers

Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?

☒ Terms & Conditions presented

☒ Understood by workers

☒ Same as actual conditions

Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Migrant Workers	
Type of work undertaken by migrant workers:	N/A, there are no migrant workers in the facility.
Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0
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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not Applicable.
Is there any observation on this finding?	Not Applicable.
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Non-employee workers	
Recruitment Fees	
Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Agency Workers (if applicable) (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.)	
Number of agencies used (average):	0
Please provide the names of agencies if applicable	N/A, there are no agencies in the facility.
Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there a legal contract agreement with all agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not Applicable.
Does the site have a system for checking labour standards of agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not Applicable.
Contractors (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.)	
Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not Applicable.

Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not Applicable.
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8A - Sub-Contracting and Homeworking
[Summary of Findings]**8A: Compliance Requirements**

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

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

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 facility, as all orders were produced in the facility premises.

Evidence examined:

During the management interview, it was evident that there were no sub-contracting / home workers hired by the facility.

Any other comments:

No Additional Comments.

Summary of sub-contracting – if applicable

Is there any sub-contracting at this site? ☐ Yes ☒ No

Summary of homeworking – if applicable

Is homeworking used at this site? ☐ Yes ☒ No

9 - No Harsh or Inhumane Treatment is Allowed
[Summary of Findings]

9: Compliance Requirements

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.

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

1. The facility has updated written anti-harsh or inhumane treatment policy on January 1, 2024. This policy includes commitment 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.

2. There is no physical abuse or discipline in the facility. As per the management and workers' interviews, the workers are aware that the disciplinary procedure of the factory was verbal warning.

Evidence examined:

1. The policy for no harsh or inhumane treatment updated on January 1, 2024 was reviewed.

2. Management interview.

3. Workers interviews (10 workers).

Any other comments:

No Additional Comments.

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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility is operated under SEDEX before; all the workers and employees are informed that they can send their suggestions or complaints to SEDEX.
If yes, are workers aware of these channels and have access? Please give details.	Yes, all the workers and employees are aware about informing SEDEX of their suggestions and complaints.
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Through e-mails and on phone calls.
Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Worker <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other
Please provide grievance mechanism details	The facility has a grievance mechanism as they have an open-door policy and grievance box (1 box) as well. The HR and Admin Manager (Mr. Sief) is in charge of checking this box on a monthly basis.
Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

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)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
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 Please give details:

10A - Entitlement to Work and Immigration
[Summary of Findings]

10A: Compliance Requirements

10.A.1 Only workers with a legal right to work shall be employed or used by the supplier.

10.A.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:

1. There were no agency workers, employment agencies or immigration workers present. Only workers who have the legal right to work shall be hired by the facility. The facility does not have any migrant workers. All the facility workers are Egyptians.

Evidence examined:

1. Policy and procedure updated on January 1, 2024 were reviewed.

2. Personnel files for the sampled workers (10) were reviewed.

Any other comments:

No Additional Comments.

10B2 - Environment 2-Pillar
[Summary of Findings]

10B2: Compliance Requirements

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

10.B2.2 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:

1. The facility has updated environmental policy on January 1, 2024, which covers its environmental impact, and has communicated to all the suppliers and customers.

2. Environmental Policy includes the facility committee in order to ensure the continuous improvements in its environmental performance.

3. The facility is aware of the significant environmental impact and the processes as mentioned in the last training on January 1, 2024.

4. The facility has measured the impacts and these impacts are mentioned in the last environmental measurements report by Environmental Service Center / Sadat University on February 13, 2024.

5. The facility has established and maintained environmental management system, which was updated on January 1, 2024.

6. The facility has designated Mr. Mohamed / HSE Manager to be in charge of continuous improvements in its environmental performance.

Evidence examined:

1. Environmental policy updated on January 1, 2024 was reviewed.

2. Environmental measurements report was done by Environmental Service Center / Sadat University on February 13, 2024.

3. Solid wastes are disposed by Hi Tech Engineering Company on a monthly basis; the contract was issued on January 1, 2023 and it's automatically renewed. The last consignment was on May 22, 2024.

4. Medical wastes are disposed by the local municipality in Menofia Governorate; the contract was issued on June 6, 2023 and it's automatically renewed. The last consignment was on June 11, 2024.



5. Drinking water analysis was done on January 23, 2024 by QCAP Laboratory; the sample was in compliance with the legal approved limits.

6. Last updates of the Egyptian Environmental Laws # 04/2004, 09/2009 and its associated decrees.

Any other comments:

No Additional Comments.

Attachments

 <u>Signed CAPR.pdf</u>	 <u>SMETA ZC417756879 ZS417935252 Green Hope - Frozen Factory, June 23, 2024, Photo Report.pdf</u>
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