




Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC413300033	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS413300273
Business name (Company name):	Egyptian Agriculture Services Trade Co Egast S A E		
Site name:	Egyptian agriculture service Trade EGAST		
Site address: <i>(Please include full address)</i>	Kilo.54-Alexandria Cairo Desert Road Near Nile Sugar Factory-Behira	Country:	Egypt
Site contact and job title:	Mr. Karim Abdullah - HR and Financial Manager		
Site phone:	01015772200	Site e-mail:	kareemalx5@gmail.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar <input type="checkbox"/> Business Ethics
Date of Audit:	17 th December, 2020		

Audit Company Name & Logo:  GSCS International Ltd.	Report Owner (payer): Egyptian Agriculture Services Trade Co Egast S A E
----------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------

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 was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

Any exceptions to this must be recorded here (e.g. different sample size): Nil

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

Lead auditor: Abdallah Mohamad Abdallah Ahmad (RA 21701695)

Lead auditor APSCA status: In Good Standing

Team auditor: N/A

Interviewers: Abdallah Mohamad Abdallah Ahmad (RA 21701695)

Report writer: Abdallah Mohamad Abdallah Ahmad (RA 21701695)

Report reviewer: Md. Mehadi Hassan







Date of declaration: 17th December, 2020

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

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

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i> <i>Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>		0	0	None observed
0B Management systems and code implementation		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	01	0	Summary of Observation: 1. The SAQ "Self-Assessment Questionnaire" wasn't completed in the SEDEX platform by the company.
1. Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None observed
2. Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None observed
3. Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	02	0	0	Summary of Non-Compliances: 1. It was evident during the facility walkthrough that there were no emergency exit aisles marking in the packhouse. 2. It was evident during facility walkthrough that emergency exit door in the packhouse was not provided with the emergency operated light.
4. Child Labour	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None observed
5. Living Wages and Benefits	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None observed
6. Working Hours	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None observed

7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None observed
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None observed
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None observed
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None observed
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None observed
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None observed
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	Not applicable as it is a 2-pillar audit.
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	Not applicable as it is a 2-pillar audit.

General observations and summary of the site:

The initial audit is conducted by GSCS International Ltd, One auditor within one working day and assessed factory operation against ETI base code and Local law requirements on a sampling basis. Overview of opening meeting, at 09:00 am, auditor entered the facility and then held an opening meeting. Below management representatives involved and present in opening meeting. Muhamad Aldaghdidi -Export Manager, Mr. Karim Abdullah- HR and Financial Manager and Sameh Abdel Salam- HSE Manger, Yasser Galal- Packhouse Manager.

Egyptian agriculture service Trade EGAST is in Kilo.54-Alexandria Cairo Desert Road Near Nile Sugar Factory- Behira- Egypt, it was established in July 2017. The facility is specialized in packing of fresh fruits (Citrus, Grapes, potatoes and Pomegranates).

The total workforce in the site is 80, there is (30 males and 50 females) & 10 non- production employees (4 managers – 6 supervisors) & 70 are production employees, all the work force are from the neighbourhood villages (100% Egyptians) and there are no migrant workers in the site. Standard hours on site were on average 48 hours/week with 1 day off in every 7-day-period. Workers work 6 days a week (Saturday to Thursday) in 1 shift from 08:00 to 16:00 with 1 hour paid break from 12:00 to 13:00, the weekly rest day is Friday, and Worker's wages are calculated on monthly basis.

The main processes are listed: Sorting-Precooling-Cooling-Packing-Shipping of fresh fruits (Grapes, potatoes and Pomegranates). For Citrus there are two additional processes which are washing and waxing, the facility has pushing new production line for Citrus from Germany.

In the opening meeting, the factory management showed interest in continuous improvement, very cooperative and provided a positive attitude towards the audit. The management team was experienced in social compliance audit for several times. Auditor was permitted in full access to all required. Information, documents, worker interviews and facility tour. The auditor took permission for taking photographs and conducting confidential employee individual & group interviews. The facility management granted permission to conduct a full audit, including employee interviews, facility walk through and document review. The facility was very cooperative towards the audit and the audit findings. The auditor performed all processes including health and safety tour, documentation, employee interview and management interview. Positive Aspects of the site:

1. All workers said they were satisfied with their employment at the factory.
2. Factory has implemented non-use of child labour policy and procedure in the factory.
3. No sign of forced labour or prison labouring was found in the factory during audit.
4. No evidence of mental/physical coercion identified during the audit.
5. Working hours were in accordance with legal requirements.
6. Factory is paying wages and benefits to all employees in accordance with legal requirements.
7. Factory has implemented environmental policies and procedure.
8. Overall responsibility for meeting the standards is taken by Mr. Karim Abdullah- HR and Financial Manager
9. The youngest worker on site was 20-years-old.
10. There is no union at this factory.
11. Site has consistent business throughout the year and November till June is peak seasons.
12. 10 male workers were selected for interview including employees, (06 individuals and 04 in group). Interviews were conducted in the confidential room. Employees' attitude was positive and polite during the audit. In addition, employees showed the favourable attitude towards the factory. **Note:** Due to Covid-19 pandemic situation we maintained safety by conducting the interviews maintaining social distance and wearing masks. All the workers in the factory were aware of Covid-19 related safety norms. The facility had also provided hand sanitizer for ensuring safety and the management was found to be closely monitoring the safety norms.
13. All workers stated they are satisfied with their employment at the factory. The facility has 12 fire extinguishers, 8 fire hose, 08 toilets 1 main gate, 5 first aid box, 4 emergency exit doors, 3 fire alarm push button, and 6 CCTV cameras.
14. Workers stated that they were able to make suggestions to their supervisors and team leaders.
15. 30 Records for wages and working hours were taken for 3 months February 2020 (Peak) - September 2020 (Non-peak) - November 2020 (Recent).
16. Payment of wages was found paid before 7th of each month.
17. Legal minimum wages paid to all workers in accordance with local law that is 1000 EGP/Month. minimum wage applied in the facility for permanent workers 2100 EGP/month.
18. As per company policy correct overtime rate is paid in the factory, workers were paid 135% of minimum wage for day overtime hours and 170% for night overtime hours.

Negative findings:

Two - non- compliances were found in the area of "Safety and Hygienic Condition". The other areas there was no violations.

Observation:

One observation was found in the area of "Management systems and code implementation".

After completion of site visit, workers interview and documents review, the closing meeting started at 17:30 pm and corrective action plan was discussed. A copy of the CAP was given to Mr. Karim Abdullah- HR and Financial Manager. Auditor thanked for good cooperation & behavior, organization and friendly working environment and left company at 18:00 pm on 17th December, 2020.

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

Site Details

Site Details																				
A: Company Name:	Egyptian Agriculture Services Trade Co Egast S A E																			
B: Site name:	Egyptian agriculture service Trade EGAST																			
C: GPS location: (If available)	GPS Address: Kilo.54-Alexandria Cairo desert Road near Nile Sugar Factory- Behira, Egypt.	Latitude: 30.850241,29 Longitude: 29.900621																		
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	TAX Card No.: 213-214-547 Commercial Record No.: 6950																			
E: Products/Activities at site, for example, garment manufacture, electrical, toys, grower, cutting, sewing, packing etc.	Packhouse- The main processes are listed: Sorting-Precooling-Cooling-Packing-Shipping of fresh vegetables and fruits (Grapes, potatoes and Pomegranates). For Citrus there are two additional processes which are washing and waxing,																			
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Egyptian agriculture service Trade EGAST is in Kilo.54-Alexandria Cairo Desert Road Near Nile Sugar Factory- Behira- Egypt, it was established in July 2017. The facility is specialized in packing of fresh fruits (Citrus).</p> <p>Building Description:</p> <table border="1"> <thead> <tr> <th>Building #01</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>1st floor</td> <td>Sorting, washing and Waxing, Packing, final QC sections, Pre-cooling and Cooling areas, Shipping area.</td> <td>Nil</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td>Nil</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Building #02</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>1st floor</td> <td>Warehouse- Packing materials</td> <td>Nil</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td>Nil</td> </tr> </tbody> </table> <p>F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F2: Please give details: No visual cracks were observed during plant tour.</p>		Building #01	Description	Remark, if any	1 st floor	Sorting, washing and Waxing, Packing, final QC sections, Pre-cooling and Cooling areas, Shipping area.	Nil	Is this a shared building?	No	Nil	Building #02	Description	Remark, if any	1 st floor	Warehouse- Packing materials	Nil	Is this a shared building?	No	Nil
Building #01	Description	Remark, if any																		
1 st floor	Sorting, washing and Waxing, Packing, final QC sections, Pre-cooling and Cooling areas, Shipping area.	Nil																		
Is this a shared building?	No	Nil																		
Building #02	Description	Remark, if any																		
1 st floor	Warehouse- Packing materials	Nil																		
Is this a shared building?	No	Nil																		

	<p>F3: Does the site have a structural engineer evaluation? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>F4: Please give details: The site have structural engineer evaluation No 4/160236/1990/3</p>
<p>G: Site function:</p>	<p><input type="checkbox"/> Agent <input 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 checked="" type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor</p>
<p>H: Month(s) of peak season: (if applicable)</p>	<p>From November till July.</p>
<p>I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)</p>	<p><u>The facility is specialized</u> in packing of fresh fruits (Citrus- Grapes, Potatoes and Pomegranates). <u>-The main processes are listed:</u> Sorting-Precooling-Cooling-Packing-Shipping of fresh fruits (Grapes, Potatoes and Pomegranates). For Citrus, there are two additional processes which are washing and waxing. <u>-The main machine list is as the following:</u> 05 production lines, 04 pre-cooler and 06 cooling units. <u>-The list of chemicals used in the facility:</u> - 15 Imazalil and TBZ 29 Package/month.</p>
<p>J: What form of worker representation / union is there on site?</p>	<p><input type="checkbox"/> Union (name) <input type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input checked="" type="checkbox"/> None</p>
<p>K: Is there any night production work at the site?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>L: Are there any on site provided worker accommodation buildings e.g. dormitories</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation</p>
<p>M: Are there any off site provided worker accommodation buildings</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers</p>
<p>N: Were all site-provided accommodation buildings included in this audit</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: If no, please give details Not applicable</p>

Audit Parameters			
A: Time in and time out	Day 1 Time in: 09:00 Day 1 Time out: 18:00	A3: Day 2 Time in: N/A A4: Day 2 Time out: N/A	A5: Day 3 Time in: N/A A6: Day 3 Time out: N/A
B: Number of auditor days used:	1 Man-day (One auditor used for 1 day)		
C: Audit type:	<input checked="" type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi - announced: Window detail: weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If No, why not: The SAQ "Self-Assessment Questionnaire" wasn't completed in the SEDEX platform by the company.		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mr. Karim Abdullah- HR and Financial Manager		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	N/A		
J: Previous audit type:	N/A		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		

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

B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	Not applicable, there is no worker representative in the facility as this is not obligatory / requirement under local law.		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	Not applicable, 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	0	30	0	0	0	0	0	30
Worker numbers – female	0	50	0	0	0	0	0	50
Total	0	80	0	0	0	0	0	80
Number of Workers interviewed – male	0	4	0	0	0	0	0	4
Number of Workers interviewed – female	0	6	0	0	0	0	0	6
Total – interviewed sample size	0	10	0	0	0	0	0	10

A: Nationality of Management	Egyptian
------------------------------	----------

<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first. <i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities: Egyptian B1: Nationality 1: <u> Egyptian </u> B2: Nationality 2: <u> N/A </u> B3: Nationality 3: <u> N/A </u></p>	<p>Was the list completed during peak season? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please describe how this may vary during peak periods: Not Applicable</p>
<p>C: Please provide more information for the three most common nationalities.</p>	<p>C: approx % total workforce: Nationality 1 <u> Egyptian </u> C1: approx % total workforce: Nationality 2 <u> 0 </u> C2: approx % total workforce: Nationality 3 <u> 0 </u></p>	
<p>D: Worker remuneration (management information)</p>	<p>D: <u> 0 </u>% workers on piece rate D1: <u> 0 </u>% hourly paid workers D2: <u> 100 </u>% salaried workers Payment cycle: D3: <u> 0 </u>% daily paid D4: <u> 0 </u>% weekly paid D5: <u> 100 </u>% monthly paid D6: <u> 0 </u>% other D7: If other, please give details: Not applicable</p>	

Worker Interview Summary	
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	04 workers in 01 group (4 x1)
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 2 D2: Female: 4
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details Not Applicable
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
H: What was the most common worker complaint?	There were no complaints raised by the interviewed workers. The workers' interviews showed that, workers have positive attitude towards the company, confirmed good working conditions, and stated that salaries are paid on time.
I: What did the workers like the most about working at this site?	The thing which the workers like most is that they are covered under social security and the site has provided the Free meals and medical care.
J: Any additional comment(s) regarding interviews:	The interviews were conducted in the field open air. The workers were free to speak with the auditor and they seemed not to be coached by management.
K: Attitude of workers to hours worked:	All workers are satisfied towards the working hours as well as to the overtime hours.

L. Is there any worker survey information available?
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details: Not applicable
M: Attitude of workers: (Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk
<p>The factory allowed the auditor from GSCS International Ltd to conduct confidential worker interviews. The workers were chosen freely without any influence by the factory management; 10 workers (01 group of 04 workers + 06 individuals) were randomly selected by auditor from different sections for interview. The workers showed a cooperative attitude during the interview process. Based on worker's interview, they expressed their positive attitude to the management and payment system. All workers were satisfied with working conditions and benefits.</p> <p>Note: Due to Covid-19 pandemic situation we maintained safety by conducting the interviews maintaining social distance and wearing masks. All the workers in the factory were aware of Covid-19 related safety norms. The facility had also provided hand sanitiser for ensuring safety and the management was found to be closely monitoring the safety norms.</p> <p>The effective evidences were collected by worker's interview; the following information was summarized:</p> <ol style="list-style-type: none"> Workers said that they were not required to lodge "deposits" or their identity cards at the recruitment and were free to leave or resign after reasonable notice. All interviewees reflected that workers could complain to management or worker committee representative's directly or by writing letters through suggestion box and all interviewed workers were aware of workers' representative. All workers stated that factory provided induction training for new workers and regular safety training for all workers. Workers said they had participated in fire drills once in every 03 months, and most of them knew how to use the fire equipment. All interviewees confirmed that the factory had checked their ID cards or birth certificate to verify their ages. They never seen or heard any child labour less than 18 years old employed in this factory. All interviewed workers said that they were paid by monthly wage system. Wages were paid once a month within first 7 working days of the following pay period. All the employees' wages were paid by Cash. No delay of wage was identified through worker interview and management interview. Standard hours on site were on average 48 hours/week with 1 day off in every 7-day-period. Workers work 6 days a week (Saturday to Thursday) in 1 shift from 08:00 to 16:00 with 1 hour paid break from 12:00 to 13:00, the weekly rest day is Friday, and Worker's wages are calculated on monthly basis. The interviewed workers said that they could obtain the job based on their working experiences and abilities. The female workers or male workers' wages were calculated at the same for the same work based on their performance.
N: Attitude of worker's committee/union reps: (Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk
Not applicable, there is no workers committee/ union representative in the facility.
O: Attitude of managers: (Include attitude to audit, and audit process. Both positive and negative information should be included)
The facility management was found to be cooperative throughout the audit and had a positive attitude towards the auditors' team.

Audit Results by Clause

0A: Universal Rights covering UNGP

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

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. The facility has implemented and maintained a system to follow the ETI Base Code requirements and this system was reviewed during the audit.
2. Factory has developed the policy of Universal Rights.
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.
4. The facility has grievance mechanism which allows the workers to use the grievance box freely and has open door policy to talk to the management directly without coercion or pressure, in order to report any situation or case related to human rights (working conditions).
5. The facility has designated, Mr. Karim Abdullah (HR and Financial Manager) as responsible monitor, deploy and communicate the Human rights policy in the facility.

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

Details:

Human rights procedure dated November 1st, 2020 and policy dated November 1st, 2020 to cover all the human rights impacts and issues and to keep the workers' information in their personal files on confidentiality basis, this information was reviewed during the audit.

Any other comments: None

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: mainly applicable for the parent company): The facility is committed to respect the human rights as it has a policy dated November 1st, 2020 , covered all the human rights impacts and issues.</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Mr. Karim Abdullah Job title: HR and Financial Manager</p>
<p>C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: The facility has grievance mechanism which allows the workers to use the grievance box freely and has open door policy to talk to the management directly without coercion or pressure, in order to report any situation or case related to human rights (working conditions).</p>
<p>D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details Not Applicable</p>
<p>E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The facility has a policy dated November 1st, 2020, stated that all the workers' information is kept in their personnel files and this information is confidential.</p>

Findings		
<p>Finding: Observation <input type="checkbox"/> Company NC <input type="checkbox"/> Description of observation: None observed Local law or ETI/Additional elements / customer specific requirement: None observed Comments: None observed</p>		<p>Objective evidence observed: Not applicable</p>

Good examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p>Objective Evidence Observed: Not applicable</p>

Measuring Workplace Impact

Workplace Impact		
<p>A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)</p>	<p>A1: Last year: 2019 __3.2__ %</p>	<p>A2: This year :2020 __1.5__ %</p>
<p>B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2]</p>	1.7%	
<p>C: 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</p>	<p>C1: Last year: 2019 __2.2__ %</p>	<p>C2: This year :2020 __2__ %</p>
<p>D: 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</p>	1.5	
<p>E: Are accidents recorded?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>E1: Please describe: Accidents and injury record dated November 1th, 2020 has been reviewed. As per the Egyptian Labour law article# 228 that all industrial establishment employing 54 workers or more, and all non- industrial establishment employing fifty workers or more shall provide the concerned manpower directorate with a semi-annual statistical statement on the diseases and injuries, during the first half of the months of January and June at most.</p> <p>The last updated injury records were reviewed. It was the formal one which is delivered to the legal social insurance office, which is stating that there are no injuries at the Site.</p>	
<p>F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]</p>	<p>F1: Last year: 2019 Number: 0</p>	<p>F2: This year: 2020 Number: 0</p>
<p>G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]</p>	0	
<p>H: Lost day work cases per 100 workers:</p>	<p>H1: Last year: 2019 Number: 0</p>	<p>H2: This year: 2020 Number: 0</p>

[(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]		
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months ____0__% workers	I2: 12 months ____0__% workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months ____0__% workers	J2: 12 months ____0____% workers

0B: Management system and Code Implementation

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

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

Current Systems and Evidence Examined

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

Current systems:

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 were reviewed during the audit.
2. The facility has written policies and procedures related to legal requirements and ETI Base Code as well. They communicate the last updates to the workers verbally through induction/refresher trainings.
3. Mr. Karim Abdullah / HR and Financial Manager is responsible to deploy, monitor and communicate the ETI Base Code principles in the facility.

One Observation was found in the areas of "Management system & code implementation". For details please refer to contents of Observation.

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

Details:

1. Procedures and policies dated November 1st, 2020 were reviewed.
2. Declaration to appoint a management representative to be responsible for compliance with ETI Base Code was reviewed.
3. Workers interviews.
4. Management interview.
5. Training Records were reviewed.

Any other comments: None

Management Systems:

<p>A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: Please give details: The facility did not receive any fines or prosecutions for non-compliances to any regulations during the last 12 months.</p>
<p>B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The facility has well organized management procedures and policies</p>

	updated on November 1st, 2020 which prohibits all kinds of forced labour, child labour, discrimination, harassment & abuse.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Although the facility has well organized management procedures and policies which prohibits all kinds of forced labour, child labour, discrimination, harassment & abuse.
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: The managers trained on ETI Base code through the induction training upon their hiring.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: It was evident during the facility walkthrough and management and workers interviews that ETI base code was communicated with all workers, supervisors and managers. The facility has posted the code onto the announcement board. Last training onto the code was on 18 th November, 2020.
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please give details: The site doesn't have internationally recognized system certification.
G: Is there a Human Resources manager/department? If Yes, please detail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Mr. Karim Abdullah (HR and Financial Manager).
H: Is there a senior person / manager responsible for implementation of the code	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Mr. Karim Abdullah - HR and Financial Manager is responsible to deploy.
I: Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Mr. Karim Abdullah (HR and Financial Manager) is implementing HR procedure to keep all the hiring documents and related workers information in personal files kept in safe place.
J: Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Mr. Karim Abdullah (HR and Financial Manager) is implementing HR procedure to keep all the hiring documents and

	related workers information in personal files kept in safe place.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: 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 updated was November 1 st , 2020.
L: 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 L1: Please give details: The facility has process to do a remediation plan and corrective actions towards any issues raised during the risk assessment process.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: The facility has a policy dated on November 1 st , 2020 in place, which is communicated with their suppliers through sending them the related policies and contracts as per legal requirements as well as through verbal communication over the phone.
Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: The facility is owned by the facility owner and he has all the land rights. Also, it has valid and updated land rights license.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: The facility has all required permissions as follows: Commercial Record No.: 6950 The facility has a periodic check from related official labour office in order to renew all legal permits and license.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No P1: If yes, how does the company obtain FPIC: Not applicable
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: The facility is owned by the facility owner and he has all the land rights.

<p>R: Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: The Facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts.</p>
<p>S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details: There is a contract between the company and government agencies</p>

Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed Local law and/or ETI requirement: Not applicable Recommended corrective action: Not applicable</p>	<p>Objective evidence observed: Not applicable</p>

Observation:	
<p>Description of observation: The SAQ "Self-Assessment Questionnaire" wasn't Completed in the SEDEX platform by the company.</p> <p>Local law or ETI requirement: In accordance with Additional Element 0.B.1: Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p> <p>Comments It is recommended by SMETA guidelines to complete the SAQ related to the company.</p>	<p>Objective evidence observed: 1. Based on per on site SAQ review</p>

Good Examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p>Objective evidence observed: Not applicable</p>

1: Freely Chosen Employment

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

ETI

- 1.1 There is no forced, bonded or involuntary prison labour.
- 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

Current Systems and Evidence Examined

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

Current systems:

1. The facility has written policy and procedure updated on November 1st, 2020 to be following the Egyptian labour law and ETI base code requirements.
2. The facility recruited the workers through interviewing with the HR manager and filling application form.
3. The sampled workers stated that they are free to leave the workplace after reasonable notice, also during the facility walkthrough, all the doors are unlocked.
4. Mr. Karim Abdullah / HR and Financial Manager is implementing HR procedure to check the workers' original documents upon hiring and keep copies of all these documents and related worker's information in their personal files. During the documents review, there is no deposits are required, no personal documents are retained.
5. It was evident during the facility walkthrough that there were no concerns regarding forced labour, migrant workers observed, and it was confirmed during the workers' interviews.

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

- 1. Policy of freely chosen and employment procedure updated on November 1st, 2020 were reviewed.
- 2. Work contracts were reviewed for all workers to ensure noticed periods; each worker receives a replica of signed contract by both parties.
- 3. Personal files were reviewed for workers to review the workers hiring documents (replica of birth certificate, replica of ID cards, replica of signed contract).
- 4. Workers interview showed that overtime applied at this facility is complying with the legal requirements.

Any other comments: None

<p>A: Is there any evidence of retention of original documents, e.g. passports/ID's</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, please give details and category of workers affected: Not applicable.</p>
<p>B: Is there any evidence of a loan scheme in operation</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please give details and category of worker affected: Not applicable.</p>
<p>C: Is there any evidence of retention of wages /deposits</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

	C1: If yes, please give details and category of worker affected: Not applicable.
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding: No such case found during the workers interviews, as the workers are free to terminate their work contract with reasonable notice and time.
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding: Not applicable as the yearly turnover of the factory was less than £36m.
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding: No restrictions on workers' freedoms to leave the site at the end of the workday.
G: 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 G1: If yes, please give details and category of workers affected: No such case found during the workers' interviews, as the workers are free to leave the site at the end of the work day.
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: The site recruited the workers through interviewing with the HR manager and filling application form by themselves and signed the labour contracts.

Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law: <input type="checkbox"/> NC against customer code: None observed Local law and/or ETI requirement : Not applicable Recommended corrective action: Not applicable	Objective evidence observed: Not applicable

Observation:	
Description of observation: None observed Local law or ETI requirement: Not applicable Comments: Not applicable	Objective evidence observed: Not applicable

Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed: Not applicable

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

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

1. The site has written policies and procedures updated on November 1, 2020; they follow the legal requirements.
2. The site doesn't have a trade union or worker representatives; the site has grievance mechanism which allows the workers to use the grievance box freely and has open door policy to talk to the management directly without coercion or pressure, in order to report any situation or case related to human rights (working conditions).
3. It was evident during the workers interview that the above mechanism is communicated with the open-door policy and grievance policy as they confirmed that they are have the total free access to use these two communication methods with site management.

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

Details:

- Written grievance policy and open-door policy updated on November 1, 2020 were reviewed.
- During the workers' interview, they stated that they have positive attitude towards the site and there were no complaints raised by them.
- Management interview.

Any other comments: None

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

<p>D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: All the workers are communicated with the management through grievance box (1 box) which is located at the main gate for any complaints/ suggestions. The facility also has an open-door policy, which allows all the workers to talk to the management freely.</p> <p>D2: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable</p>	
<p>E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: Please give details: There is no workers' representative or union representatives in the facility, and these are not a legal requirement for this facility.</p>	
<p>F: Name of union and union representative, if applicable:</p>	<p>Not applicable</p>	<p>F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p>
<p>G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?</p>	<p>Not applicable</p>	<p>G1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p>
<p>H: Are all workers aware of who their representatives are?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable</p>	<p>Not applicable</p>
<p>I: Were worker representatives freely elected?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable</p>	<p>I1: Date of last election: Not applicable</p>
<p>J: Do workers know what topics can be raised with their representatives?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable</p>	
<p>K: Were worker representatives/union representatives interviewed?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please state how many: Not applicable</p>	
<p>L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.</p>	<p>Not applicable, as there is no workers' representative or union representatives in the facility, and these are not a legal requirement for this facility.</p>	
<p>M: Are any workers covered by Collective Bargaining Agreement (CBA)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	
<p>If Yes, what percentage by trade Union/worker representation</p>	<p>M1: __ N/A __% workers covered by Union CBA</p>	<p>M2: __ N/A __% workers covered by worker rep CBA</p>

M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
------------------------------------------------------------------------------------------	------------------------------------------------------------------------

Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed Local law and/or ETI requirement: Not applicable Recommended corrective action: Not applicable	Objective evidence observed: Not applicable

Observation:	
Description of observation: None observed Local law or ETI requirement: Not applicable Comments: Not applicable	Objective evidence observed: Not applicable

Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed: Not applicable

3: Working Conditions are Safe and Hygienic

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

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

ETI

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

3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.

3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

Current Systems and Evidence Examined

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

Current systems:

1. The facility provided safe and hygienic working environment according to the risk assessment plan and hazard identification procedure updated on November 1st, 2020, also checked health & safety records such as (emergency preparedness and response procedure updated on November 1st, 2020, health & safety work instructions were reviewed.
2. Health & safety policy and procedures updated on November 1st, 2020, procedures such as the emergency preparedness and response procedure, health & safety work instructions, accident & emergency work instruction, all these policies and procedure were reviewed.
3. The facility has provided clean toilet facilities and potable water and provided sanitary facilities for food storage.
4. **The last training courses which were held in the facility, are as the follows**
 - Firefighting training: on 18th November 2020.
 - First aid training was on: 23rd November 2020.
5. The facility has designated Sameh Abdel Salam- HSE Manger and he is responsible for Health & Safety issues.

Two non-compliances were found in the area of "Working Conditions are Safe and Hygienic". For details please refer to contents of non-compliances.

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

- Health, safety and hygiene procedures and policies dated November 1st, 2020 were reviewed.
- Safety, hygiene, electric, temperature hazards were identified.
- Facility walkthrough.
- Management interview.
- Workers interviews.
- Document and records were reviewed during the audit:
 - Health & Safety risk assessment dated November 1st, 2020.
 - Health & Safety Policy dated on November 1st, 2020.
 - Facility licenses and permissions.
 - Health & Safety Training records.

➤ Last external visit for the fire safety equipment was on 14th November 2020
Any other comments: None

<p>A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: The facility has general health & safety policies and procedures which are fit for purpose and these policies are communicated with the workers in their language through the announcement boards.</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: These policies are included in the workers' manual in their language and they received awareness training program related to these policies.</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: As observed during the facility walkthrough, there is no additions been made to the original structure.</p>
<p>D: Are visitors to the site informed on H&S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: The facility displays H&S instructions posters at the main gate and at prominent places within the facility, as per the norm of production processes inside the facility, no PPEs are required to be worn during the walkthrough.</p>
<p>E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: Please give details: The medical room is not provided for the workers in the facility as per Egyptian Labour Law no. 12/2003, article no. 220 that the site shall provide the first aid means for its workers, If the number of the establishment's workers in the same place, or the same town , or in a circle with a radius of fifteen kilometres exceeds fifty workers, the establishment shall employ one or more qualified male nurses for nursing or first aid services in each shift of work at the site, charge a doctor to visit them at the place provided by the facility for that purpose, and given them the medicines necessary for treatment free of charge. The facility uses Noubaria Public Hospital for medical cases, which is less than 5 km away from the facility.</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: The site has a trained first aiders (2 first aiders) and accessible first aid boxes (5 first aid box).</p>
<p>G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: It was evident during the workers interviews that they confirmed their satisfaction concerning the</p>

	transportation which they found safe, suitable and maintained, Also, they stated that no smoking is permitted in the buses.
H: 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 H1: Please give details: No dormitory/ accommodation was provided for the workers.
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: The last H&S risk assessment has been done on November 1 st , 2020 which covers all the processes and hazards in place. No fatal or dangerous risk has been identified in the last risk assessment of the facility
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: The facility conducts the environmental measurements on regular basis last one was on November 1 st 2020. -There is a waste disposal contract with the local authorities (environment officials).
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No K1: Please give details: No specific requirements as the facility customer use and there is not the use of banned chemicals

Non-compliance: Two

2. Description of non-compliance:

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

It was evident during the facility walkthrough that there were no emergency exit aisles marking in the packhouse.

Local law and/or ETI requirement:

In accordance with ETI base 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.

Local law and/or ETI requirement:

In accordance with Egyptian Labour Law 12/2003, Book 5, Article 214: Facility has to take all precautions to prevent hazards of fire and that all fire equipment is up to standards.

In accordance with Egyptian Labour Law 12/2003, book 5, Article 215: requires that the employer shall carry out an evaluation and analysis of the risks and of the expected industrial and natural disasters, and prepare an emergency plan and to practice this plan to ensure effectiveness.

Recommended corrective action: It is recommended that H&S Representative shall ensure that all the emergency exit aisles are marked and clear for all workers.

Objective evidence observed:

1. Based on facility walkthrough.

NC Photo-01

<p>Action by: Mr. Karim Abdullah- HR and Financial Manager</p> <p>Timescale: 30 Days.</p> <p>2. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>It was evident during facility walkthrough that emergency operated light was not provided on the emergency exit door at pack-house.</p> <p>Local law and/or ETI requirement: In accordance with ETI base 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. In accordance 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 or the activity exercised by the establishment, and the physiochemical 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 firefighting 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. B) Articles, apparatuses, and means of transport handling and power transmission.</p> <p>Recommended corrective action: It is recommended that H&S Representative shall ensure that all the emergency exit doors are provided with the emergency operated lights and emergency exit signs.</p> <p>Action by: Mr. Karim Abdullah- HR and Financial Manager</p> <p>Timescale: 30 Days.</p>	<p>2. Based on facility walkthrough. NC Photo-02</p>
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------

Observation:	
<p>Description of observation: None observed</p> <p>Local law or ETI requirement: Not applicable</p> <p>Recommended corrective action: Not applicable</p>	<p>Objective evidence observed: Not applicable</p>

Good Examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed: Not applicable

4: Child Labour Shall Not Be Used

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- 1. Employment procedure dated November 1st, 2020 included commitment that the facility would never employ and use child labour under the minimum legal age (18 years old). All workers are hired directly, age verification was conducted during the personal files review
- 2. The facility has checked workers' original national ID cards at the time of recruitment and kept a replica in their personal files.
- 3. Personal files and age proof verification documents were reviewed and included the follows:
 - a. replica of birth certificate.
 - b. Photocopy of passports.
 - c. Recent photo.
 - d. Criminal Record.
 - e. Educational Background.
- 4. The national ID's card included workers names, resident addresses and dates of birth.

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

Details:

- Employment procedure updated November 1st, 2020; child labour policy dated November 1st, 2020 were reviewed.
- Management interview.
- Workers interviews.

Any other comments: None.

A: Legal age of employment:	18 years old
B: Age of youngest worker found:	20 years old
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0 %
E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details Not Applicable

Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed Local law and/or ETI requirement: Not applicable Recommended corrective action: Not applicable	Objective evidence observed: Not applicable

Observation:	
Description of observation: None observed Local law or ETI requirement: Not applicable Comments: Not applicable	Objective evidence observed: Not applicable

Good Examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed: Not applicable

5: Living Wages are Paid

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

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

ETI

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. The facility pays sick leave, maternity leave and annual leave.
2. Procedure and policy are indicated that the facility paid for overtime premiums as per the legal requirements as the following:
 - a. 135% of workers basic wages to workers for their day light hour's overtime work.
 - b. 170% of workers basic wages to workers for their night hour's overtime work.
 - c. 200% of workers basic wages to workers for their weekly day off overtime work.
 - d. 300% of workers basic wages to workers for their holidays overtime work.
3. Workers basic wages were paid based on the local minimum wage standard of 1000 EGP/month, the minimum salary detected was 2100 EGP/ month; this was evident during the documents and records review.
4. All workers were provided with written and understandable information about their work condition in respect to wages before they entered to the work and about the particulars of their wages for the pay period concerned every time that they were paid.
5. Payrolls (10 from each month) for February 2020 (Peak) – September 2020 (Non-peak) – November 2020 (Recent) were reviewed during the audit.
6. It was evident during the documents review that there are no illegal or unauthorized deductions were observed.

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

Details:

- Employment procedure updated November 1st, 2020 was reviewed.
- The facility complies with legal requirements for wages and benefits, the following documents & records were checked.
 - a. Payrolls (10 from each month) February 2020 (Peak) – September 2020 (Non-peak) – November 2020 (Recent) were reviewed during the audit
 - b. Deduction records.
 - c. Attendees records.
 - d. Incentive records.

Any other comments: None

Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed Local law and/or ETI requirement: Not applicable Recommended corrective action: Not applicable</p>	<p>Objective evidence observed: Not applicable</p>

Observation:	
<p>Description of observation: None observed Local law or ETI requirement: Not applicable Comments: Not applicable</p>	<p>Objective evidence observed: Not applicable</p>

Good Examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p>Objective Evidence Observed: Not applicable</p>

Summary Information

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal maximum: 48 hours / week	A1: 48 hours / week	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal maximum: 12 hours / week	B1: 2 Hours/day 12 hours / week	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: 1000 EGP / Month	C1: 2100 EGP / Month	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: Egyptian labour law 12/2003, article # 85 which required overtime fee is	D1: The facility complies with the Egyptian law and pays 135% for day overtime hours	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

	135 % for day hours and 170 % for night hours.	and 170 % for night overtime hours which is 10.70 EGP / 1 hours for day overtime hours and 13.45 EGP / 1 hours for night overtime hours	
--	------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------	--

Wages analysis: (Click here to return to Key Information)			
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
A1: If No , why not?	Not applicable		
B: Sample Size Checked <i>(State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	10 Time records and payrolls for- February 2020 (Peak) 10 Time records and payrolls for- September 2020 (Non-Peak) 10 Time records and payrolls for- November 2020 (Recent) were reviewed during the audit		
C: Are there different legal minimum wage grades? If Yes , please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	C1: If Yes , please give details: Not applicable	
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	D1: If No , please give details: Not applicable	
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	E1: Lowest actual wages found: 2100 EGP/Month	
F: Please indicate the breakdown of workforce per earnings:	F1: __0__% of workforce earning under minimum wage F2: __0__% of workforce earning minimum wage F3: __100__% of workforce earning above minimum wage		
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: Not applicable		
H: What deductions are required by law e.g. social insurance? Please state all types:	Social security and taxes		
I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that have been made.	1. Social Security 2. Taxes

			Please describe: Social security-taxes and necessary deductions to follow the legal requirements.
		I2: Please list all deductions that have not been made.	1. 2. Please describe: None
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	K1: Type <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: Please give details: All the working hours are recorded in the time records.		
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time: Not applicable		
M2: 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 Other – please give details: Not applicable		
N: 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 N1: Please give details: The facility is committed with Egyptian local law 12/2003 article 3, there shall be review for wages in annual basis with a raise of 7%. There is a periodic visit from the work office officials to check wages, insurances and files if there is any non-conformity during the visit, there will be fine.		
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

	<p>P1: Please give details: All workers are receiving fair salaries, exceeding by far the legal minimum wage in the country and that according to seniority and job positions, their salaries vary between 2100 EGP to 12000 EGP.</p>
<p>Q: How are workers paid:</p>	<p> <input checked="" type="checkbox"/> Cash <input type="checkbox"/> Cheque <input type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain: Not applicable </p>

6: Working Hours are not Excessive

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

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

ETI

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. The facility works 6 days a week starting from Saturday to Thursday in 1 shift from 08:00 to 16:00 with 1 hour paid lunch break from 12:00 to 13:00, the weekly rest day is Friday.
2. All sampled workers take rest 1 day per week and work a 6 days / week based on Egyptians labour law.
3. All the workers are hired directly to the facility and there are no agency workers in the facility.
4. The facility uses manual time records to record working hours and for payrolls, payrolls for payrolls (10 from each month) February 2020 (Peak) – September 2020 (Non-peak) November 2020 (Recent).
5. Were reviewed during the audit. During the documents review, there were no concerns regarding the working hours observed.

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

Details:

- Employment procedure updated November 1st, 2020 was reviewed.
- Documents and records review included attended sheet and production records were checked.
- 3. Attended time records for payrolls for payrolls 10 from each month February 2020 (Peak) – September 2020 (Non-peak) – November 2020 (Recent) were reviewed during the audit.

- Workers interview.

Any other comments: None

Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed Local law and/or ETI requirement: Not applicable Recommended corrective action: Not applicable</p>	<p>Objective evidence observed: Not applicable</p>

Observation:	
<p>Description of observation: None observed Local law or ETI requirement: Not applicable Comments: Not applicable</p>	<p>Objective evidence observed: Not applicable</p>

Good Examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p>Objective Evidence Observed: Not applicable</p>

Working hours' analysis		
Please include time e.g. hour/week/month (Go back to Key information)		
Systems & Processes		
A. What timekeeping systems are used: time card etc.	Describe: Manual attendance sheets	
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details: Not applicable	
C: Are standard/contracted working hours defined in all	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details: Not applicable

contracts/employment agreements?		
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D1: If YES, please complete as appropriate:
		<input type="checkbox"/> 0 hrs <input type="checkbox"/> Part time <input type="checkbox"/> Variable hrs <input type="checkbox"/> Other
		If "Other", Please define:
		Not applicable
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E1: If yes , please detail hours, %, types of workers affected and frequency Please give details: Not applicable
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		Maximum number of days worked without a day off (in sample):
		6 days' work and 1 day off (Friday)
Standard/Contracted Hours worked		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency:
		Not applicable
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details:
		Not applicable
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 2 Hours Day /12 hours Week / 48 Hours Months According to the Labour Law, weekly working hours are 48 hours. And Overtime Hours worked 2 Hours Day /12 hours Week	
J: Combined hours (standard or contracted)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

<p>+ overtime hours = total) over 60 found? Please give details:</p>		
<p>K: Approximate percentage of total workers on highest overtime hours:</p>	<p>___20___%</p>	
<p>L: Is overtime voluntary?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information</p>	<p>L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Based on the documents review, worker and management interview, overtime found voluntary.</p>
<p>Overtime Premiums</p>		
<p>M: Are the correct legal overtime premiums paid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p>M1: Please give details of normal day overtime premium as a % of standard wages The facility pays overtime premiums as per Egyptian labour law, Article # 85 which required overtime fee as following: a.135% of workers basic wages to workers for their day light hour's overtime work. b.170% of workers basic wages to workers for their night hour's overtime work. c.200% of workers basic wages to workers for their weekly day off overtime work. d.300% of workers basic wages to workers for their holidays overtime work.</p>
<p>N: Is overtime paid at a premium?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>N1: If yes, please describe % of workers & frequency: If yes, please describe % of workers & frequency: The facility pays overtime premiums as per Egyptian labour law, Article # 85 which required overtime fee as following: a.135% of workers basic wages to workers for their day light hour's overtime work. b.170% of workers basic wages to workers for their night hour's overtime work. c.200% of workers basic wages to workers for their weekly day off overtime work. d.300% of workers basic wages to workers for their holidays overtime work.</p>
<p>O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.</p>	<p><input checked="" type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other</p>	
	<p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p>	

	Not Applicable
<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p>	<input type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <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)
	<p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p>
	Not Applicable
<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>Q1: If yes, please give details: Not applicable</p>
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

7: No Discrimination is Practiced

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

1. It was noted during the interview with the management and workers and documents review that there was no discrimination on hiring, compensation, promotion, termination or retirement and access to training.
2. The facility provided the same payment for workers from the same category and experience.

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

Details:

- Employment procedure updated November 1st, 2020 was reviewed.
- Management interview.
- Workers interview.
- Documents and records were reviewed as follows:
 - Application form.
 - Grievance and suggestion box.

Any other comments: None

<p>A: Gender breakdown of Management + Supervisors (Include as one combined group)</p>	<p>A1: Male: __100__ % A2: Female_0__ %</p>
<p>B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:</p>	<p>#:0</p>
<p>C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:</p>	<p> <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 </p> <p>C1: Please give details: There was no evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.</p>

Professional Development	
A: What type of training and development are available for workers?	Not applicable, there is no professional training available to the workers.

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

Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed Local law and/or ETI requirement: Not applicable Recommended corrective action: Not applicable	Objective evidence observed: Not applicable

Observation:	
Description of observation: None observed Local law or ETI requirement: Not applicable Comments: Not applicable	Objective evidence observed: Not applicable

Good Examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed: Not applicable

8: Regular Employment Is Provided

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

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

ETI

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current systems:

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

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

Details:

- Policy and procedure dated November 1st, 2020 were reviewed.
- Management interview.
- Workers interviews.
- Documents and records were reviewed as following:
 - Payroll records were reviewed.
 - Based on the labour contract, all the workers are covered with social insurance
 - Labour contracts are matching with the legal requirements were reviewed.

Any other comments: None

Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed Local law and/or ETI requirement: Not applicable. Recommended corrective action: Not applicable</p>	<p>Objective evidence observed: Not applicable</p>

Observation:	
<p>Description of observation: None observed Local law or ETI requirement: Not applicable Comments: Not applicable</p>	<p>Objective evidence observed: Not applicable</p>

Good Examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p>Objective Evidence Observed: Not applicable</p>

Responsible Recruitment

All Workers	
<p>A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are the same as current conditions?</p>	<p><input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions</p> <p>A1: If any are unchecked, please describe finding and specific category(ies) of workers affected: Not applicable</p>
<p>B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>B1: If yes, please describe details and specific category(ies) of workers affected: Not applicable</p>

C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other - C1: If other, please give details: Not applicable
D: If any checked, give details:	Not applicable

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

NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other B1 - If other, please give details: Not applicable
C: If any checked, give details:	Not applicable

Agency Workers (if applicable) <i>(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)</i>	
A: Number of agencies used (average):	A1: Names if available: Not applicable
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Not applicable
E: Does the site have a system for checking labour standards of agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Not applicable

If yes, please give details.	
------------------------------	--

Contractors: NA <i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i>	
A: Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, how many contractors are present, please give details: Not applicable
B: If Yes , how many workers supplied by contractors?	Not applicable
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: Not applicable
D: If Yes , please give evidence for contractor workers being paid per law:	Not applicable

<p>8A: Sub-Contracting and Homeworking (Click here to return to summary of findings) (Click here to return to Key Information)</p>
<p>8A.1 There should be no sub-contracting unless previously agreed with the main client. 8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing. Note to auditor on homeworking: Report on whether it is direct or via agents. How many workers, relationship with site and what control systems are in place. Note to auditor on subcontracting: auditor should use this section for subcontractors of part made or wholly made finished goods, this section should not be used for raw material manufacturers unless instructed otherwise by customers</p>

<p>Current Systems and Evidence Examined</p> <p><i>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.</i></p>
<p>Current systems: There are no sub-contracting /home workers hired by the facility, as all orders were produced in the facility premises. Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate): Details: Not applicable Any other comments: None</p>

<p>Non-compliance:</p>	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None Observed Local law and/or ETI /Additional Elements requirement: Not applicable Recommended corrective action: Not applicable Recommended corrective action:</p>	<p>Objective evidence observed: Not applicable</p>

<p>Observation:</p>	
<p>Description of observation: None Observed Local law or ETI/Additional elements requirement: Not applicable Comments: Not applicable</p>	<p>Objective evidence observed: Not applicable</p>

Good Examples observed:	
Description of Good Example (GE): None Observed	Objective Evidence Observed: Not applicable

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

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

F: What processes are carried out by homeworkers?	Not applicable
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Not applicable
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable

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

ETI

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

Additional elements:

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

<p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>A1: Please give details: The site has a grievance mechanism as they have an open-door policy and grievance boxes as well.</p>
<p>B: If Yes, are workers aware of these channels and have access? Please give details.</p>	<p>Yes, the workers are aware of the grievance mechanism of grievance boxes and open-door policy and they use these mechanisms when necessary.</p>
<p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<p>Grievance mechanism and Open-door policy.</p>
<p>D: Which of the following groups is there a grievance mechanism in place for?</p>	<input checked="" type="checkbox"/> Workers <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other <p>D1: Please give details: The facility has a grievance mechanism as they have an open-door policy and grievance box (1 box) as well. Mr. Karim Abdullah - HR and Financial Manager to check this box on weekly basis.</p>
<p>E: Are there any open disputes?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>E1: If yes, please give details Not Applicable</p>
<p>F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>F1: If no, please give details Not Applicable</p>
<p>G: Is there a published and transparent disciplinary procedure?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>G1: If no, please explain Not Applicable</p>
<p>H: If yes, are workers aware of these the disciplinary procedure?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>H1: If no, please give details Not Applicable</p>

<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>I1: If yes, please give details Not Applicable</p>
----------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------

<p>Current Systems and Evidence Examined</p> <p><i>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.</i></p>
<p>Current systems:</p> <ol style="list-style-type: none"> The facility has written anti-harsh or inhumane treatment policy updated November 1st, 2020 was reviewed; This policy is included commitment declared that the physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is prohibited. There is no physical abuse or discipline in the facility and the discipline procedure of the facility was verbal warning and deduction as per the management and workers' interviews. <p>Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):</p> <p>Details:</p> <ul style="list-style-type: none"> The policy for no harsh or inhumane treatment dated on November 1st, 2020 was reviewed. Management interview. Workers interviews. <p>Any other comments: None</p>

<p>Non-compliance:</p>	
<p>1. Description of non-compliance:</p> <p><input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>None observed</p> <p>Local law and/or ETI requirement: Not applicable.</p> <p>Recommended corrective action: Not applicable.</p>	<p>Objective evidence observed: Not applicable</p>

<p>Observation:</p>	
<p>Description of observation: None observed</p> <p>Local law or ETI requirement: Not applicable</p> <p>Comments: Not applicable Comments:</p>	<p>Objective evidence observed: Not applicable</p>

Good Examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed: Not applicable

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

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

Additional Elements

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

Current Systems and Evidence Examined

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

Current systems:

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

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

Details:

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

Any other comments: None

Non-compliance:

1. Description of non-compliance:

NC against ETI NC against Local Law NC against customer

code:

None observed

Local law and/or ETI requirement:

Not applicable.

Recommended corrective action:

Not applicable.

Objective evidence observed:

Not applicable

Observation:	
Description of observation: None observed Local law or ETI requirement: Not applicable Comments: Not applicable	Objective evidence observed: Not applicable

Good examples observed:	
Description of Good Example (GE): Not applicable	Objective Evidence Observed: Not applicable

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. The facility has environmental policy updated November 1st, 2020 which covering their environmental impact and communicated to all the suppliers and customers.
2. Environmental Policy includes the facility committee to ensure the continuous improvements in their environmental performance.
3. The facility has established and maintained environmental management system updated November 1st, 2020.

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

Details:

- Environmental policy dated on November 1st, 2020 was reviewed.
- During the facility walkthrough, it was evident that the facility controls the solid wastes especially the empty containers inside the chemicals store and keeps the solid wastes to be disposed by local municipality on daily basis.
- Waste disposal contract with the local authorities (environment officials).
- Last updates of the Egyptian Environmental Laws # 04/2004, 09/2009 and their associated decrees.

Any other comments: None

Non-compliance:

1. Description of non-compliance:

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

None observed

Local law and/or ETI requirement:

Not applicable.

Recommended corrective action:

Not applicable

Objective evidence observed:

Not applicable.

Observation:	
Description of observation: None observed Local law or ETI/additional elements requirement: Not applicable. Comments: Not applicable	Objective evidence observed: Not applicable

Good examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed: Not applicable.

Other findings













Other Findings Outside the Scope of the Code
None observed

Community Benefits
<i>(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)</i>
None observed

Appendix 1

<p>Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."</p> <p style="text-align: center;"><input checked="" type="checkbox"/> Not Applicable please x</p>	
<p>NOTE: The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.</p>	<p>Instruction to Audit Company: fill in the relevant clauses from the Customer Supplier Code - where applicable.</p>

Photo Form

		
<p>Main Gate</p>	<p>Security room</p>	<p>Hand washing Area</p>
		
<p>Toilet</p>	<p>Personal Locker</p>	<p>Receiving Area</p>
		
<p>Sorting Area</p>	<p>Cheeking Area</p>	<p>Final Checking Area</p>
		
<p>Packing Area</p>	<p>Plate Area</p>	<p>Raw Materials Area</p>

 <p>17/12/2020 12:35 PM</p>	 <p>17/12/2020 12:35 PM</p>	 <p>17/12/2020 12:35 PM</p>
<p>Pre-Cooling Area</p>	<p>Cooling Area</p>	<p>Shipping Area</p>

 <p>17/12/2020 12:35 PM</p>	 <p>17/12/2020 12:35 PM</p>	 <p>17/12/2020 12:34 PM</p>
<p>Raw Material Store</p>	<p>Fire Extinguisher</p>	<p>Fire Hose Pipe</p>

 <p>17/12/2020 12:40 PM</p>
<p>First Aid Box</p>

Non-Compliance Photo:

	
<p>No emergency exit aisles marking in Pack house</p>	<p>Emergency operated light was not provided on the emergency exit door at pack-house</p>
<p>NC Photo#01</p>	<p>NC Photo#02</p>



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

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

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

[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](#)

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d

[Click here for Supplier \(B\) members:](#)

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d

[Click here for Auditors:](#)

<https://www.surveymonkey.co.uk/r/BRTVCKP>

