



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 410080126	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 410107608
Business name (Company name):	Joud for horticulture exports		
Site name:	Joud for horticulture exports		
Site address: <i>(Please include full address)</i>	Al Deblomasein Rd, Wadi Al Natron, El Beheira, Egypt	Country:	Egypt
Site contact and job title:	Tarek Abdel Moneim - Owner		
Site phone:	01033777343	Site e-mail:	Joudforhorticulutreexports@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:	24 April 2022		

Audit Company Name & Logo: 	Report Owner (payer): Joud for horticulture exports
--	---

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

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

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

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

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

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

Lead auditor: Ali Ibrahim, Senior Auditor APSCA number: RA21705282

Lead auditor APSCA status: RA (In Good Standing)

Team auditor: N/A APSCA number: N/A

Interviewers: Ali Ibrahim APSCA number: RA21705282

Report writer: Ali Ibrahim

Report reviewer: Claudia Machado, Senior Report Reviewer

Date of declaration: 24 April 2022

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

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

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>				None Observed
0B Management systems and code implementation		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		01		- It was evident during interviews and documents review was conducted social training but not updated.
1. Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None Observed
2. Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None Observed
3. Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	01			- It was evident during the documents review and site walkthrough that the risk assessment report was not covering all the farm processes.
4. Child Labour	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None Observed
5. Living Wages and Benefits	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	01			- It was evident during documents review that in March, Social Security receipt has paid but not stamped by the responsible employee.
6. Working Hours	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None Observed
7. Discrimination	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None Observed

8	Regular Employment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None Observed
8A	Sub-Contracting and Homeworking		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				N/A
9	Harsh or Inhumane Treatment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None Observed
10A	Entitlement to Work		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None Observed
10B2	Environment 2-Pillar		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None Observed
10B4	Environment 4-Pillar		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				N/A
10C	Business Ethics		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				N/A

General observations and summary of the site:

The periodic audit (2-pillar) was conducted by LSQA. By One auditor within one working day and assessed facility against ETI base code and Egyptian Local law requirements on a sampling basis.

Auditor entered the facility and was welcomed by the farm management, then an opening meeting was held on 24 April 2022 at 9.00AM to 9.30Am below.

The representatives of the management participating and present in the opening session, Mr. Tarek Abdel Moneim / CEO, Mrs. Hala Tarek / HR Manager, Mr. Magdy Mahmoud / H&S Manager and Mr. Karim Tarek / Quality Manager, In the opening meeting, the farm 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.

The facility management granted permission to conduct a full audit and access to all required, including conducting confidential workers interviews both (individual & group) and (male & female), facility walk through, taking photographs 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 review, interviews with (management/employees/workers).

Positive Aspects of the site:

- All workers said they were satisfied and take all human right.
- site provided all tools to save all workers from any risk.
- Facility has implemented non-use of child labour policy and procedure in the site.
- No sign of forced labour or prison labouring was found in the facility during audit.
- No evidence of mental/physical coercion identified during the audit.
- Farm is paying wages and benefits to all employees in accordance with Egyptian legal requirements.
- Working hours were in accordance with legal requirements.
- There was no evidence of discrimination and site published a policy for anti-discrimination.
- All workers said they were satisfied with their employment at the facility.
- Farm has implemented environmental policies and procedure.

Overall Site Summary:

- Joud for horticulture exports is located in Al Deblomasein Rd, Wadi Al Natron, El Beheira, Egypt.
- It is a privately owned company was established from 2019.
- The business is owned by Mr. Tarek Abdel Moneim / CEO.
- The farm has been managed by Mr. Karim Tarek / Quality Manager.
- Overall responsibility for meeting the standards is taken by the Mr. Karim Tarek / Quality Manager.
- The site is specialized in farming and harvesting of fresh fruits and vegetables.
- The main manufacturing processes are: Farming, Growing and Harvesting of fresh fruits and vegetables (Oranges, Mandarins, Lemons, Mangoes, Grapes, Pomegranates and Strawberries).
- The youngest worker on site was 19-years-old.
- There is no union or worker representative at this facility as this is not Obligatory / requirement under local law.
- The total workforce in the site is 45 workers (20 males and 25 females), all the work forces are from the neighbourhood villages (100% Egyptians) and there are no migrant workers in the site.
- 10 workers were selected for interview, (06 individuals and 4 workers 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 farm.
- The facility has 10 fire extinguishers, 02 Fire hose reels, 10 Toilets (07males and 03 females), 06 First aid Boxes, 05 Emergency Exits and 2 Grievance boxes.
- Workers stated that they were able to make suggestions and grievances to their supervisors and team leaders also have Grievances box in canteen area.
- 10 Records for wages and working hours were taken for 3 months October 2021 (Random) _ December 2021 (peak) _ March 2022 (Recent).
- Salaries are paid via Cash for all workers and employees during the first week of each month.
- The nearest fire station is Wadi Al Natron central fire station which is 03 km far from the facility. The nearest hospital is Wadi Al Natron public hospital which is 05 km far from the facility.

- The main market in UK, Europe and local Market.
- 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) weekly rest day is Friday.
- The normal working hours starting from 08:00 to 16: 00 with one hour for lunch break from 12:00 till 13:00.
- Security guards work in 2 shifts; The first shift is from 08.00 to 20.00 and the second shift is from 20.00 to 08.00.
- The facility uses manual record to record worker's working hours.
- Workers 'wages are calculated on monthly basis Legal minimum wages paid to all workers in accordance with local law that is 2400 EGP/Month. Minimum wage applied in the facility for workers 3500 EGP/month.
- As per company policy correct overtime rate is paid in the farm, workers were paid 150% of minimum wage for normal overtime hours.

Negative findings:

One non- compliance was found in the area of "Management systems and code implementation",

One non- compliance was found in the area of "Safety and Hygienic Condition",

One non- compliance was found in the area of "Living Wages and Benefits", and the other areas there was no violations.

After completion of site visit, workers interview and documents review, the closing meeting started on 24 April 2022 at 17:30 pm and corrective action plan report was discussed. A copy of the signed CAPR was left to Tarek Abdel Moneim / CEO, Auditor thanked for good cooperation & behaviour, organization and friendly working environment and left company at 18:00 pm.

**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:	Joud for horticulture exports	
B: Site name:	Joud for horticulture exports	
C: GPS location: (If available)	GPS Address: Al Deblomasein Rd, Wadi Al Natron, El Behira, Egypt	Latitude: 30°20'36.6 "E Longitude: 30°21'42.6 "N
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: 569-923-239 Expiry Date: 26-11-2020 Commercial record: 8143	
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	The facility is specialized in the growing of fresh fruits and vegetables (Oranges, Mandarins, Lemons, Mangoes, Grapes, Pomegranates and Strawberries)	
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<ul style="list-style-type: none"> - Joud for horticulture exports is located at Al Deblomasein Rd, Wadi Al Natron, El Beheira, Egypt, it is a privately owned company. -The site is specialized in farming and harvesting of fresh fruits and vegetables. The main manufacturing processes are: Farming, Growing and Harvesting of fresh fruits and vegetables (Oranges, Mandarins, Lemons, Mangoes, Grapes, Pomegranates and Strawberries). -The total workforce in the facility is 45 workers (20 males and 25 females); they work in 1 shift; the first is from 08.00 to 16.00 with 1-hour break from 12.00 to 13.00. -The site works 6 days a week (Saturday to Thursday) and Friday are the weekly day off. The normal working hours is from 08.00 to 16.00 with 1 hour break from 12.00 to 13.00. - The site uses manual attendance sheets to record working hours for employees. Salaries are paid in cash on monthly basis. - The nearest fire station is Wadi Al Natron central fire station which is 03 km far from the facility. The nearest hospital is Wadi Al Natron public hospital which is 05 km far from the facility. -10 Time records and payrolls were reviewed during the audit. - The facility has: 10 fire extinguishers, 02 Fire hose reels, 10 Toilets (07males and 03 females), 06 First aid kits, 05 Emergency Exits and 2 Grievance boxes. - The main markets are UK and Europe. - Interviews have been conducted with 10 workers, 4 workers in 1 group (4X1) and 6 workers individually and all the workers have been chosen from all production sections. 	

	<p>F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: It was evident during the site walkthrough that there is no visible structural issue or cracks.</p> <p>F3: Does the site have a structural engineer evaluation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>F4: Please give details: It was evident during the site walkthrough that there is no visible structural engineer evaluation.</p>
<p>G: Site function:</p>	<p><input type="checkbox"/> Agent <input type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input checked="" type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor</p>
<p>H: Month(s) of peak season: (if applicable)</p>	<p>From Dec. to Apr</p>
<p>I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)</p>	<p>The facility is specialized in the growing of fresh fruits and vegetables (Oranges, Mandarins, Lemons, Mangoes, Grapes, Pomegranates and Strawberries).</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: There is no accommodation/dormitory provided for the workers by the site.</p>

Audit Parameters			
A: Time in and time out	Day 1 Time in: 9.00 Day 1 Time out: 18.00	Day 2 Time in: N/A Day 2 Time out: N/A	Day 3 Time in: N/A Day 3 Time out: N/A
B: Number of auditor days used:	1 Lead Auditors x 1 Man-day.		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define:		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail: weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Tarek Abdel Moneim - Owner		
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:	20 March 2021		
J: Previous audit type:	Periodic Audit		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input 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

<p>D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i></p>	<p>N/A, there is no worker representatives in the site as this is not Obligatory / requirement under local law.</p>
<p>E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i></p>	<p>N/A, there is no union representatives in the site as this is not Obligatory / requirements under local law.</p>

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*				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	5	15	0	0	0	0	0	20
Worker numbers – female	2	23	0	0	0	0	0	25
Total	7	38	0	0	0	0	0	45
Number of Workers interviewed – male	02	03	0	0	0	0	0	05
Number of Workers interviewed – female	02	03	0	0	0	0	0	05
Total – interviewed sample size	04	06	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.</p> <p><i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities:</p> <p>B1: Nationality 1: Egyptian</p> <p>B2: Nationality 2: _____</p> <p>B3: Nationality 3: _____</p>	<p>Was the list completed during peak season?</p> <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods:</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx 100% total workforce: Nationality 1 Egyptian</p> <p>C1: approx % total workforce: Nationality 2 _____</p> <p>C2: approx % total workforce: Nationality 3 _____</p>	
D: Worker remuneration (management information)	<p>D: _____% workers on piece rate</p> <p>D1: _____% hourly paid workers</p> <p>D2: 100% salaried workers</p> <p>Payment cycle:</p> <p>D3: _____% daily paid</p> <p>D4: _____% weekly paid</p> <p>D5: 100% monthly paid</p> <p>D6: _____% other</p> <p>D7: If other, please give details</p>	



Worker Interview Summary	
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	1 Group * 4 Workers
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 03 D2: Female: 03
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
H: What was the most common worker complaint?	There were no complaints raised by the interviewed workers. The workers' interviews showed that, workers have positive attitude towards the company, confirmed good working conditions, and stated that salaries are paid on time.
I: What did the workers like the most about working at this site?	The thing which the workers like most is that they are covered under social security. Free meals are provided for all workers.
J: Any additional comment(s) regarding interviews:	The interviews were conducted in the field. The workers were free to speak with the auditors' team 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:
M: Attitude of workers: <i>(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</i>
There were no complaints raised by the interviewed workers. The workers' interviews showed that, workers have positive attitude towards the site, confirmed good working conditions, and stated that salaries are paid on time.
N: Attitude of worker's committee/union reps: <i>(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</i>
N/A, there is no workers committee/ union representative in the site.
O: Attitude of managers: <i>(Include attitude to audit, and audit process. Both positive and negative information should be included)</i>
The site management was found to be cooperative throughout the audit and had a positive attitude towards the auditors' team.

Audit Results by Clause

0A: Universal Rights covering UNGP

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

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- The facility has implemented and maintained a system to follow the ETI Base Code Requirements and this system were reviewed during the audit.
- Farm has not developed the policy of Universal Rights.
- The facility has a transparent system in place for the confidentiality reporting and dealing with the human rights impacts and issues without any fear of reprisals.
- The facility has 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).
- The facility has designated, Mrs. Hala Tarek / HR 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):

- Human rights procedure and policy dated 15 Nov. 2021 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.
- The facility communicated the human rights policy with their suppliers through sending them the related policies and contracts as per legal requirements as well as through verbal communication over the phones and with workers inside the workplace through verbal communication up on hiring (induction and refresher trainings).

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

- Yes
 No

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

	on Nov. 2021, covered all the human rights impacts and issues.
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Hala Tarek Job title: HR Manager
C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: The facility has a transparent system in place for the confidentiality reporting and dealing with the human rights impacts and issues without any fear of reprisals. The facility has grievance mechanism which allows the workers to use the grievance box freely to communicate with them for any complaints, in order to report any situation or case related to human rights (working conditions).
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The company is implementing HR procedures to keep all workers' information private and in a safe place.

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

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

Measuring Workplace Impact

Workplace Impact		
<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: 2021 __0__ %</p>	<p>A2: This year: 2022 __0__ %</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>	0	
<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: 2021 __0__ %</p>	<p>C2: This year: 2022 __0__ %</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>	0	
<p>E: Are accidents recorded?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Accidents and injury record updated on Nov. 2021 was reviewed during the documents review. 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 July and January at most. 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 facility.</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: 2021 Number: 0</p>	<p>F2: This year: 2022 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	

H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 2021 0	H2: This year: 2022 0
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:

- 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.
- 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.
- Mrs. Hala Tarek / HR 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):

- Procedures and policies updated on 15 Nov. 2021 were reviewed.
- Declaration to appoint a management representative to be responsible for compliance with ETI Base Code was reviewed.
- Workers interviews.
- Management interview.
- Training Records were reviewed.

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 site 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 site has well organized management procedures and policies updated on Nov., 2021 which prohibits all kinds of forced labour, child labour, discrimination, harassment & abuse.</p>
<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>The site has implemented effectively all procedures and policies updated on Nov., 2021.</p> <p>All procedures are communicated to the workers in their language such as forced labour, child labour and non-discrimination policies.</p> <p>Also, the site conducted awareness training programs for all workers in January 4th, 2022 in separate sessions. Additionally, the site has posted these policies on the announcement boards.</p>
<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: It was evident during the site walkthrough and management and workers interviews that ETI base code was communicated with all workers, supervisors and managers. The site has posted the code at the announcement board.</p> <p>Last training to the code was in April 4th, 2022 in separate sessions.</p>
<p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: It was evident during the workers' interview that they are aware with the site' policies and procedures, the site provides managers and workers with related awareness training programs using the legal requirements and SEDEX guidelines as training material (as reference).</p>
<p>F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

	F1: Please give details: The site doesn't have internationally recognised system certification but the site is GLOBAL G.A.P.
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: Mrs. Hala / HR and Admin Manager is responsible to deploy, monitor and communicate HR procedure at the site.
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: Mrs. Hala / HR and Admin Manager is implementing HR procedure to keep all the hiring documents and related workers information in personal files kept in safe place.
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: Mrs. Hala / HR and Admin 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: The site has a policy updated on Nov., 2021 stated that all the workers' information is kept in their personnel files at the human resource dept. and this information is confidentiality.
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 site 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 on 15/11/2021.
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 site has process to do a remediation plan and corrective actions towards any issues raised during the risk assessment process.
M: Does the site have policy/code which requires labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: The site has a policy updated on 15/11/2021 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 rented by the facility owner and he has all the land rights. Also, the facility 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 a periodic check from local authorities in order to renew all legal permits and license. The facility has all required land rights and permissions as follows: Tax card: 569-923-239 Commercial record: 8143
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?
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: Please give details: The facility is rented by the facility owner and he has all the land rights.
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No R1: Please give details: As mentioned in Q.Q.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details: As mentioned above.

Non-compliance:	
<p>1. Description of non-compliance: Nil</p> <p><input checked="" type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law</p> <p><input type="checkbox"/> NC against customer code:</p> <p>It was evident during interviews and documents review was conducted social training but not updated.</p> <p>Local law and/or ETI requirement:</p> <p>0.B.4 Suppliers are expected to communicate this Code to all employees.</p>	<p>Objective evidence observed:</p> <ul style="list-style-type: none"> - During interviews and documents review.

Recommended corrective action: HR Manager shall update training for all workers about ethical code.	
---	--

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

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

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:

- The site has written policy and procedure updated on 15 Nov. 2021 to be in compliance with the Egyptian labour law and ETI base code requirements.
- The site recruited the workers through interviewing with the HR manager and filling application form.
- The sampled workers stated that they are free to leave the workplace after reasonable notice, also during the site walkthrough, all the doors are unlocked.
- HR and Admin Manager is implementing HR procedure to check the workers' original documents upon hiring and keep copies of all these documents and related workers information in their personal files. During the documents review, there is no deposits are required, no personal documents are retained.
- It was evident during the site 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):

- Policy of freely chosen and employment procedure updated on 15 Nov. 2021 were reviewed.
- Work contracts were reviewed for all workers to ensure noticed periods; each worker receives a copy of signed contract by both parties.
- Personal files were reviewed for workers to review the workers hiring documents (copy of birth certificate, copy of ID cards, copy of signed contract).
- Worker's interview showed that overtime applied at this site is complying with the legal requirements.
- Management interview.

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

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:
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 such case found during the workers' interviews, as the workers are free to leave the site at the end of the work day.
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: The site understands the risks of the forced / trafficked / bonded labour in its supply chain as the management and the workers are aware about ETI Base Code principles.
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 HR and Admin Manager and filling application form by themselves and signed the labour contracts.

Non-compliance: None	
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: Nil Local law and/or ETI requirement: Nil Recommended corrective action: Nil	Objective evidence observed: Nil

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

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

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

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- 1- The site has written policies and procedures updated on 15 Nov. 2021; they are in compliance with the Egyptian Labour Law.
- 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 boxes freely and has open door policy to talk to the management directly without coercion or pressure, in order to report any situation or case related to human rights (working conditions).
- 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):

- 1. Written grievance policy and open-door policy updated on Nov., 2021 were reviewed.
- 2. During the workers' interview, they stated that they have positive attitude towards the site and there were no complaints raised by them.
- 3. Management interview.

<p>A: 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>B: Is it a legal requirement to have a union?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>C: Is it a legal requirement to have a worker's committee?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

<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 boxes (02 box) which are located in the lockers room for any complaints/ suggestions. The site also has an open-door policy, which allows all the workers to talk to the management freely. D2: Is there evidence of free elections? N/A <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</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 site.</p>	
<p>F: Name of union and union representative, if applicable:</p>	<p>N/A</p>	<p>F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p>
<p>G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?</p>	<p>N/A</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</p>	<p>N/A</p>
<p>I: Were worker representatives freely elected?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>I1: Date of last election: N/A</p>
<p>J: Do workers know what topics can be raised with their representatives?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N/A</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: N/A</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>N/A, as there is no workers' representative or union representatives in the site.</p>	
<p>M: Are any workers covered by Collective Bargaining Agreement (CBA)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N/A</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>
<p>M3: If Yes, does the Collective Bargaining Agreement (CBA) include rates of pay?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N/A</p>	

Non-compliance: None	
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: Nil Local law and/or ETI requirement: Nil Recommended corrective action: Nil	Objective evidence observed: Nil
Observation: None	
Description of observation: Nil Local law or ETI/additional elements requirement: Nil Comments: Nil	Objective evidence observed: Nil
Good Examples observed: None	
Description of Good Example (GE): Nil	Objective Evidence Observed: Nil

3: Working Conditions are Safe and Hygienic

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

1. The site provided safe and hygienic working environment according to the risk assessment plan and hazard identification procedure updated, also checked health & safety records such as (emergency preparedness and response procedure) updated on Nov., 2021, health & safety work instructions were reviewed.
2. Health & safety policy procedures updated on 15/11/2021 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 site 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 site, are as the follows**
 - First aid awareness training was on: Dec.11th, 2021.
 - OHS awareness trainings were on: Feb. 26th, 2022.
5. The last fire drill was on Jan., 10th, 2022 and the next one will be planned in Dec. 2021.
6. The site has designated H&S Manager and he is responsible for Health & Safety issues.

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

1. Health, safety and hygiene procedures and policies updated on 15/11/2021 were reviewed.
2. Safety, hygiene, electric, temperature hazards were identified.
3. Site walkthrough.
4. Management interview.
5. Workers interviews.
6. Document and records were reviewed during the audit:
 - 2- Health & Safety risk assessment.
 - 3- Health & Safety Policy.
 - 4- Site licenses and permissions.

- 5- Health & Safety Training records.
- 6- Training Plan.
- 7- H&S Internal audits are done on daily basis by HSE Manager.
- 8- Accidents and Injuries log.

<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 normal of production processes inside the facility, PPEs are provided to be worn during the walkthrough.</p>
<p>E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: Please give details: The medical room is not provided for the workers in the facility as per Egyptian Labour Law no. 12/2003, article no. 220 that the site shall provide the first aid means for its workers, If the number of the establishment's workers in the same place, or the same town , or in a circle with a radius of fifteen kilometres exceeds fifty workers, the establishment shall employ one or more qualified male nurses for nursing or first aid services in each shift of work at the facility, charge a doctor to visit them at the place provided by the facility for that purpose, and given them the medicines necessary for treatment free of charge.</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: The facility has trained first aiders (3 first aiders) and accessible first aid boxes (6 boxes).</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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: It was evident during the workers interviews that they confirmed their satisfaction concerning the transportation which they found safe, suitable and maintained, Also, they stated that no smoking is permitted in the buses.
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: There was no dormitory 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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No I1: Please give details: The last H&S risk assessment has been updated which covers all the processes in place but it was evident during the documents review that the risks and hazards analysis report did not cover the fire risks in the Packhouse.
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 and the last report was done on 15/03/2022 by Environmental studies and research institute / Sadat University.
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 site customer use the (SEDEX supplier workbook and SMETA best practice guidance version 6.1/ May 2019, ETI base code).

Non-compliances

1. Description of non-compliance:

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

It was evident during the documents review and site walkthrough that the risk assessment report was not covering all the farm processes.

Local law and/or ETI requirement:

ETI requirement:

clause 3.1 that the establishment and its branches shall carry out an evaluation and analysis of the risks and of the expected industrial and natural disasters and prepare and emergency plan for protection of the establishments and its workers in the event of occurring disaster, providing the effectiveness of this plan should be tested.

Local law:

In accordance to Egyptian labour law 12/2003: Article No. (215).

Recommended corrective action: It's recommended that the facility should make sure that the risk assessment is covering all the farm processes.

Objective evidence observed:

- during the documents review and site walkthrough.

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

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

4: Child Labour Shall Not Be Used

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- Employment procedure updated on 15/11/2021 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
- The facility has checked workers' original national ID cards at the time of recruitment and kept a copy in their personal files.
- Personal files and age proof verification documents were reviewed and included the follows:
 - o Copy of birth certificate.
 - o Copy of passports.
 - o Recent photo.
 - o Criminal Record.
 - o Educational Background.
- The national ID's card included workers names, resident addresses and dates of birth.
- It was evident during the documents review; the age of youngest worker is 19 years old.
- During the facility walkthrough, there were no concerns regarding child labour observed.

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

- Employment procedure and child labour policy updated on Nov. 2021 were reviewed.
- Management interview.
- Educational Background records.
- Workers interviews.
- Documents and records were checked as follows:
 - o Personal files for all workers.
 - o Copies of birthday certificates for workers.
 - o Recent photos.
 - o Criminal Records.

A: Legal age of employment:	18 years old
B: Age of youngest worker found:	19 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

Non-compliance: None	
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: Nil Local law and/or ETI requirement: Nil Recommended corrective action: Nil	Objective evidence observed: Nil

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

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

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 site pays sick leave and annual leave.
2. Procedure and policy are indicated that the site 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 2400 EGP/month, the minimum salary detected was 3500 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 Record were reviewed during the course of 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):

1. Employment procedure updated on Nov. 2021 was reviewed.
2. The site complies with legal requirements for wages and benefits, the following documents & records were checked.
 - a. Payrolls Record were reviewed during the audit.
 - b. Deduction records.
 - c. Attendees records.
 - d. Incentive records.

Non-compliance:

<p>1. 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: It was evident during documents review that in March, Social Security receipt has paid but not stamped by the responsible employee.</p> <p>Local law and/or ETI requirement: ETI requirement: 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. Local law: Social Insurance Law No. 148 of 2019.</p> <p>Recommended corrective action: The facility should make sure that all Social Security receipt stamped by responsible employee.</p>	<p>Objective evidence observed:</p> <ul style="list-style-type: none"> - during documents review.
--	---

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

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

Summary Information

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal maximum: 48 hours / week	A1: 48 hours / week	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal maximum: 12 hours / week	B1: 12 hours / week	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: 2400 EGP / Month	C1: 3500 EGP / Month	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<p>D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</p>	<p>Legal minimum: Egyptian labour law 12/2003, article # 85 which required overtime fee is 135 % for day hours and 170 % for night hours.</p>	<p>D1: The facility complies with the Egyptian law and pays 135% for day overtime hours and 170 % for night overtime hours.</p>	<p>D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
--	---	---	--

<p style="text-align: center;">Wages analysis: <i>(Click here to return to Key Information)</i></p>		
<p>A: Were accurate records shown at the first request?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>A1: If No, why not?</p>		
<p>B: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)</p>	<p>10 Time records and payrolls for October 2021 (Random) 10 Time records and payrolls for December 2021 (peak) 10 Time records and payrolls for March 2022 (Recent) were reviewed during the course of the audit.</p>	
<p>C: Are there different legal minimum wage grades? If Yes, please specify all.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>C1: If Yes, please give details:</p>
<p>D: If there are different legal minimum grades, are all workers graded and paid correctly?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p>	<p>D1: If No, please give details:</p>
<p>E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?</p>	<p><input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above</p>	<p>E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> 3500 EGP</p>
<p>F: Please indicate the breakdown of workforce per earnings:</p>	<p>F1: ____% of workforce earning under minimum wage F2: ____% of workforce earning minimum wage F3: 100% of workforce earning above minimum wage</p>	
<p>G: Bonus Scheme found: Please specify details:</p>	<p>Bonus Scheme found: Nil <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i></p>	
<p>H: What deductions are required by law e.g. social insurance? Please state all types:</p>	<p>Social security– taxes and necessary deductions to be in compliance with the legal requirements.</p>	

I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that have been made.	1. Social Security 2. Taxes Please describe: necessary deductions to be in compliance with the legal requirements.
		I2: Please list all deductions that have not been made.	1. 2. Please describe:
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 checked="" type="checkbox"/> Yes <input 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:	
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:		
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: <ul style="list-style-type: none"> 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 10%. 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>P: Is there evidence that equal rates are being paid for equal work:</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: All workers are receiving fair salaries, exceeding by far the legal minimum wage in the country and that according to seniority and job positions, their salaries vary between 3500 EGP to 6500 EGP.</p>
<p>Q: How are workers paid:</p>	<p><input checked="" type="checkbox"/> Cash <input type="checkbox"/> Cheque <input type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain:</p>

6: Working Hours are not Excessive

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

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

ETI

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- The normal working hours starting from 08:00 to 16: 00 with one hour for lunch break from 12:00 till 13:00.
- All sampled workers take rest 1 day per week and work a 6 days / week based on Egyptians labour law.
- All the workers are hired directly to the facility and there are no agency workers in the facility.
- It was evident during the workers interview and documents review that the overtime is rare and it is voluntarily; information from worker interviews coincides with time and payroll records. The sampled workers stated that they have worked 2 overtime hours per day due to the urgent business needs (Shipments) and it was confirmed during the time records review.
- The facility uses manual recording system to record working hours and for payrolls.
- payrolls for October 2021 (Random), Dec. 2021 (peak) and March 2022 (Recent) were reviewed during the course of the audit.
- During the documents review, there were no concerns regarding the working hours observed.

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

- Employment procedure updated on Nov. 2021 was reviewed.
- Documents and records review included attended sheet and production records were checked.
- Attended time records for payrolls for October 2021 (Random), Dec. 2021 (peak) and March 2022 (Recent) was reviewed during the audit.
- Worker's interview.

Non-compliance: None

1. Description of non-compliance:

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

Local law and/or ETI requirement: Nil

Recommended corrective action: Nil

Objective evidence observed: Nil

Observation: None

Description of observation: Nil
Local law or ETI/additional elements requirement: Nil
Comments: Nil

Objective evidence observed: Nil

Good Examples observed: None

Description of Good Example (GE): Nil

Objective Evidence Observed: Nil

Working hours' analysis

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

Systems & Processes

A. What timekeeping systems are used: time card etc.	Describe: Manual Attendance Sheets.	
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details	
C: Are standard/contracted working hours defined in all contracts/employment agreements?	<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:
	<input type="checkbox"/> Yes	D1: If YES, please complete as appropriate:

D: Are there any other types of contracts/employment agreements used?	<input checked="" type="checkbox"/> No <input type="checkbox"/> 0 hrs <input type="checkbox"/> Part time <input type="checkbox"/> Variable hrs <input type="checkbox"/> Other	If "Other", Please define:
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	<i>E1: If yes, please detail hours, %, types of workers affected and frequency</i> Please give details: N/A
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:
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details:
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 2 Hours / Day.	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total	10%	

workers on highest overtime hours:		
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract/employment agreement/handbook/worker interviews/refusal arrangements: N/A
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	<p>M1: Please give details of normal day overtime premium as a % of standard wages:</p> <ul style="list-style-type: none"> - 135% of workers basic wages to workers for their day light hour's overtime work. - 170% of workers basic wages to workers for their night hour's overtime work. - 200% of workers basic wages to workers for their weekly day off overtime work. 300% of workers basic wages to workers for their holidays overtime work.
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>N1: If yes, please describe % of workers & frequency:</p> <ul style="list-style-type: none"> - 135% of workers basic wages to workers for their day light hour's overtime work. - 170% of workers basic wages to workers for their night hour's overtime work. - 200% of workers basic wages to workers for their weekly day off overtime work. 300% of workers basic wages to workers for their holidays overtime work.
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input checked="" type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other	
	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other	
	<p>The facility pays overtime premiums as per Egyptian labour law No.12 /2003, Article # 85 which required overtime fee as following:</p> <ul style="list-style-type: none"> - 135% of workers basic wages to workers for their day light hour's overtime work. - 170% of workers basic wages to workers for their night hour's overtime work. - 200% of workers basic wages to workers for their weekly day off overtime work. 300% of workers basic wages to workers for their holidays overtime work. 	
P: If more than 60 total hours per week and this is legally allowed, are	<input checked="" 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	

<p>there other considerations? Please complete the boxes where relevant.</p>	<p><input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify)</p> <p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p> <p>The workers don't work more than 60 hours / week as mentioned in the time records.</p>
<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Q1: If yes, please give details:</p>
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

7: No Discrimination is Practiced

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- 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.
- Gender discrimination was also absent in the facility; both female and male workers were distributed in all types of work.
- There was no evidence of sexual harassment.
- There was an internal grievance process, all sampled employees were aware of the grievance boxes in case they encountered any discrimination cases.
- The farm provides the same wage amount to male/female employees of the same rank.
- There is no restriction for formation of trade union in the farm.

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

- Employment procedure updated Nov., 2021 was reviewed.
- The hiring and termination procedure, leave application records and employee handbook.
- Payroll records
- Attendance records
- Termination records
- Training records
- Employment contracts were provided for review and they showed that male and female employees were on the same pay grade.
- Management interview.
- employee interview.

<p>A: Gender breakdown of Management + Supervisors (Include as one combined group)</p>	<p>A1: Male: 40% A2: Female: 50%</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, There were no females who works in skilled or technical roles.</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</p>

	<input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found C1: Please give details: It was evidence during site tour, worker interviews and documented review not found any evidence of discrimination based on race, caste, national origin, religion, age, disability and sexual orientation.
--	---

Professional Development

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

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

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

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

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

8: Regular Employment Is Provided

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

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

ETI

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current systems:

- Work performed was based on recognized work relationship established through national law and practice.
- All workers signed the labour contracts with the facility upon their hiring (on the first day of work).
- There was no home – working.
- All employees were recruited by the farm directly.
- No labour agency was used to hire workers. No temporary worker, apprenticeship schemes or home worker was identified by the auditors.
- No subcontractors were used.
- All workers getting ID card during their recruitment.
- Farm maintains service books for all workers
- Farm has policy to provide all kinds of compensation and benefits to the employees
- No temporary worker, apprenticeship schemes or home worker was identified by the auditor.

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

- Policy and procedure were reviewed.
- Management interview.
- Workers interviews.
- Documents and records were reviewed as following:
- Payroll records were reviewed. Based on the labour contract.

- all the workers are covered with social insurance Labour contracts are matching with the legal requirements were reviewed.

Non-compliance: None

1. Description of non-compliance:

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

Local law and/or ETI requirement: Nil

Recommended corrective action: Nil

Objective evidence observed: Nil

Observation: None

Description of observation: Nil

Local law or ETI/additional elements requirement: Nil

Comments: Nil

Objective evidence observed: Nil

Good Examples observed: None

Description of Good Example (GE): Nil

Objective Evidence Observed: Nil

Responsible Recruitment

All Workers

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

- Terms & Conditions presented
- Understood by workers
- Same as actual conditions

A1: If any are unchecked, please describe finding and specific category (ies) of workers affected:

B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?

- Yes
- No

B1: If yes, please describe details and specific category (ies) of workers affected:

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:
D: If any checked, give details:	N/A

Migrant Workers: N/A <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:	
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: B2: Total number of (outside of local country) recruitment agencies used:
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?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding:
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:

NON-EMPLOYEE WORKERS

Recruitment Fees: N/A	
A: Are there any fees?	<input type="checkbox"/> Yes

<p>B: If yes, check all that apply:</p>	<input type="checkbox"/> No <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:
<p>C: If any checked, give details:</p>	<p>N/A</p>

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

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

8A: Sub-Contracting and Homeworking

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

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

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

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

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems:

- As per the facility documents review, worker interview and farm tour, there was no sub-contractor or home working used by facility currently.
- Therefore, no apparent concern was detected regarding this section.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate): If any processes are sub-contracted – please populate below boxes

Process Subcontracted	Process 1	Process 2
Name of factory		
Address		

- Site tour (Calculation on total production and estimated capacity)
- Materials in/out records
- Management interview
- Worker interview

Non-compliance: None

1. Description of non-compliance:

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

Local law and/or ETI requirement: Nil

Recommended corrective action: Nil

Objective evidence observed: Nil

Observation: None

Description of observation: Nil

Local law or ETI/additional elements requirement: Nil

Comments: Nil

Objective evidence observed: Nil

Good Examples observed: None

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

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

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

	G1: Please give details:
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No

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

ETI

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
 Additional elements:
 9.2 companies should provide access to a confidential grievance mechanism for all workers

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 3 rd party?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: Please give details: The site has not published and does not provide open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 rd party.
B: If Yes , are workers aware of these channels and have access? Please give details.	N/A
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	N/A
D: Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Workers <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other D1: Please give details: The site has a grievance mechanism as they have an open-door policy and grievance box (1 box) as well. Mrs. Hala / HR and Admin Manager is in charge to check this box on weekly basis.
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details
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)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: If no, please give details
G: Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain
H: If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: If no, please give details
I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No I1: If yes, please give details

Current Systems and Evidence Examined

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

Current systems:

- The facility has written anti-harsh or inhumane treatment policy updated Nov. 2021 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.

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

- The policy for no harsh or inhumane treatment dated on 15/11/2021 was reviewed.
- Management interview.
- Workers interviews.

Non-compliance: None

1. Description of non-compliance:

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

Local law and/or ETI requirement: Nil

Recommended corrective action: Nil

Objective evidence observed: Nil

Observation: None

Description of observation: Nil

Local law or ETI/additional elements requirement: Nil

Comments: Nil

Objective evidence observed: Nil

Good Examples observed: None

Description of Good Example (GE): Nil

Objective Evidence Observed: Nil

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

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

Additional Elements

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

Current Systems and Evidence Examined

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

Current systems:

- Only workers who have the legal right to work shall be hired by the 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):

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

Non-compliance: None

1. Description of non-compliance:

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

Local law and/or ETI requirement: Nil

Recommended corrective action: Nil

Objective evidence observed: Nil

Observation: None

Description of observation: Nil

Local law or ETI/additional elements requirement: Nil

Comments: Nil

Objective evidence observed: Nil

Good examples observed: None

Description of Good Example (GE): Nil

Objective Evidence Observed: Nil

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

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

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

- Environmental policy updated on Nov., 2021 was reviewed.
- During the site walkthrough, it was evident that the site controls the solid wastes especially the empty containers inside the chemicals store and keeps the solid wastes to be disposed by local municipality on daily basis.
- Waste disposal contract with the local authorities (wadi EL-Natron environment officials) dated on January 2nd, 2022, the contract was reviewed.
- Last updates of the Egyptian Environmental Laws # 04/2004, 09/2009 and their associated decrees.

Non-compliance: None

1. Description of non-compliance:

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

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

Objective evidence observed: Nil

Observation: None

Description of observation: Nil
Local law or ETI/additional elements requirement: Nil
Comments: Nil

Objective evidence observed: Nil

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

Other findings

Other Findings Outside the Scope of the Code
None

Community Benefits <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

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><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>
ETI Code / Additional Elements	Customer's Supplier Code equivalent
0.A. Universal Rights covering UNGP	0.A. Universal Rights covering UNGP
<p>0.A. Guidance for Observations</p> <p>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.</p> <p>0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights</p> <p>0.A.3 Businesses shall identify their stakeholders and salient issues.</p> <p>0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.</p> <p>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.</p> <p>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.</p>	
0.B. Management Systems & Code Implementation	0.B. Management Systems & Code Implementation
<p>0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p> <p>0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.</p>	

<p>0.3 Suppliers are expected to communicate this Code to all employees. 0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</p>	
<p>ETI 1. Forced Labour</p>	<p>ETI 1. Forced Labour</p>
<p>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.</p>	
<p>ETI 2. Freedom of association and the right to collective bargaining are respected</p>	<p>ETI 2. Freedom of association and the right to collective bargaining are respected</p>
<p>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.</p>	
<p>ETI 3. Working conditions are safe and hygienic</p>	<p>ETI 3. Working conditions are safe and hygienic</p>
<p>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.</p>	

<p>3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.</p>	
<p>ETI 4. Child labour shall not be used</p>	<p>ETI 4. Child labour shall not be used</p>
<p>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.</p>	
<p>ETI 5. Living wages are paid</p>	<p>ETI 5. Living wages are paid</p>
<p>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.</p>	
<p>ETI 6. Working Hours are not excessive</p>	<p>ETI 6. Working Hours are not excessive</p>
<p>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</p>	

<p>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.</p> <p>6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.</p> <p>6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where all of the following are met:</p> <ul style="list-style-type: none"> – 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. <p>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.</p>	
<p>ETI 7. No discrimination is practised</p>	<p>ETI 7. No discrimination is practised</p>
<p>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.</p>	
<p>ETI 8. Regular employment is provided</p>	<p>ETI 8. Regular employment is provided</p>
<p>8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p>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.</p>	

<p>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.</p>	
<p>8A: Sub-Contracting and Homeworking</p>	<p>8A: Sub-Contracting and Homeworking</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.</p>	
<p>ETI 9. No harsh or inhumane treatment is allowed</p>	<p>ETI 9. No harsh or inhumane treatment is allowed</p>
<p>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>	
<p>10. Other Issue areas: 10A: Entitlement to Work and Immigration</p>	
<p>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.</p>	
<p>10. Other issue areas 10B2: Environment 2-Pillar</p>	

<p>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. <i>Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.</i></p>	
---	--

SMETA Extra Sections for 4 Pillar Audit:	SMETA Extra Sections for 4 Pillar Audit:
<p>Environment Section</p>	<p>Environment Section</p>
<p>B.4. Compliance Requirements 10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards. 10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc. 10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements 10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers. 10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes. 10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4-pillar audit report and audit checks for details). 10B4.7 Businesses shall make continuous improvements in their environmental performance. 10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation 10B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance. B4. Guidance for Observations 10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor. 10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.</p>	
<p>Business Practices Section</p>	

10C. Compliance Requirements

10C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.

10C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.

10C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.

10C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.

10C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,

10C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics










10C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.

10C. Guidance for Observations

10C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.

10C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented.

Photo Form

		
<p>Farm Main Gate</p>	<p>Policies panel and instruction</p>	<p>Warehouses rooms</p>
		
<p>fertilizers storage Warehouses</p>	<p>Pesticide's storage Warehouses</p>	<p>Store supplies and spare parts</p>
		
<p>Personal protective clothes room</p>	<p>Toilets room</p>	<p>Acid storage tanks</p>

		
<p>Chemicals(pesticides) mixing area</p>	<p>Chemicals(fertilizers) mixing area and irrigation pump</p>	<p>Electricals panel</p>
		
<p>First aid box</p>	<p>Grapes Plot</p>	<p>Citrus plot</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:](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

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

[Click here for Supplier \(B\) members:](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)

[http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)

[Click here for Auditors:](https://www.surveymonkey.co.uk/r/BRTVCKP)

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