



# Sedex Members Ethical Trade Audit Report

**Version 6.1**



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC400092008	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS402498016	
Business name (Company name):	Lecico Egypt S.A.E			
Site name:	Lecico For ceramic Industries			
Site address:	New Borg El-Arab City 3rd industrial zone P.O. Box 358 EG-Alexandria Alexandria 358 EG	Country:	EG	
Site contact and job title:	Asmaa Halbas / Quality and Customer Service manager			
Site phone:	+2035180011	Site e-mail:	hhafez@lecico.com	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar	<input checked="" type="checkbox"/> Business Ethics
Date of Audit:	2023-12-07			

Audit Company Name:
SGS Egypt

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

## Audit Content:

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 (March 2019) was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

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

### 2-Pillar SMETA Audit

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

### 4-Pillar SMETA

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

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

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

## SMETA Declaration

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

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

Auditor Team			
Lead Auditor:	Ahmed Hussien	APSCA Number:	21703115
Additional Auditors:	Ahmed Agha		32200527
Date of declaration:	2023-12-09		

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

Site Representation	
Full Name:	Asmaa Halbas
Title:	Quality and Customer Service manager
Date of declaration:	2023-12-09
<b>Comments:</b> <i>Any exceptions to this must be recorded here (e.g. different sample size):            Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020).            The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives</i>	

## Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
<a href="#">0A - Universal rights covering UNGP</a>			0	0	0	
<a href="#">0B - Management systems and code implementation</a>			0	0	1	GE - ZAF600275169
<a href="#">1 - Freely chosen employment</a>			0	0	0	
<a href="#">2 - Freedom of association and right to collective bargaining are respected</a>			0	0	0	
<a href="#">3 - Working conditions are safe and hygienic</a>			0	0	0	
<a href="#">4 - Child labour shall not be used</a>			0	0	0	
<a href="#">5 - Living wages are paid</a>			0	0	0	
<a href="#">6 - Working hours are not excessive</a>			0	0	0	
<a href="#">7 - No discrimination is practiced</a>			0	0	0	
<a href="#">8 - Regular employment is provided</a>			0	0	0	
<a href="#">8A - Subcontracting and homeworking</a>			0	0	0	
<a href="#">9 - No harsh or inhumane treatment is allowed</a>			0	0	0	
<a href="#">10A - Entitlement to work and immigration</a>			0	0	0	
<a href="#">10B2 - Environment 2-pillar</a>			0	0	0	
<a href="#">10B4 - Environment 4-pillar</a>			0	0	0	
<a href="#">10C - Business ethics 4-pillar</a>			0	0	0	

## Site Details

Site Details		
Company Name	Lecico Egypt S.A.E	
Site Name	Lecico For ceramic Industries	
GPS location (if available)	GPS Address:	N/A
	Coordinates:	30-50359 N - 29-35-474 E
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Commercial register # 140977 printed on 27/4/2023 - Tax Card # 202-451-028 valid until 18/12/2027 - Operation permit # 112018123000025 issued on 30/12/2018 - Industrial register # 1999/26903 valid until 9/2/2024.	
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Ceramic sanitary ware (WC Pans, Wash basins, bidets , urinals , tanks , shower trays, etc)	
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	Total land area is 36 hectares and contains 09 buildings.	

Structure and number of buildings	<b>Building Name:</b>		Building 1
	<b>Floor</b>	<b>Description</b>	<b>Remark</b>
	1	Production	None
	<b>Building Name:</b>		Building 2
	<b>Floor</b>	<b>Description</b>	<b>Remark</b>
	1	Clinic	None
	2	Adminisatrtrtion offices	None
	<b>Building Name:</b>		Building 3
	<b>Floor</b>	<b>Description</b>	<b>Remark</b>
	1	Worker's facilities	None
	<b>Building Name:</b>		Building 4
	<b>Floor</b>	<b>Description</b>	<b>Remark</b>
	1	Local product store	None
	<b>Building Name:</b>		Building 5
	<b>Floor</b>	<b>Description</b>	<b>Remark</b>
	1	Exported product store	None
	<b>Building Name:</b>		Building 6
	<b>Floor</b>	<b>Description</b>	<b>Remark</b>
	1	Spare parts store	None
	<b>Building Name:</b>		Building 7
	<b>Floor</b>	<b>Description</b>	<b>Remark</b>
	1	Mechanical workshop	None
	<b>Building Name:</b>		Building 8
	<b>Floor</b>	<b>Description</b>	<b>Remark</b>
	1	Electrical workshop	None
	<b>Building Name:</b>		Building 9
	<b>Floor</b>	<b>Description</b>	<b>Remark</b>
1	Carpenter workshop	None	
Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: None.		
Does the site have a structural engineer evaluation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The structural engineer evaluation is a part of industrial register approval.		

Site function	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack house <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-contractor
Months of peak season	January to December
Process overview	Manufacturing, export and sales of sanitary ware and ceramic tiles.
What form of worker representation is there on site?	<input type="checkbox"/> Union <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other <input type="checkbox"/> None
Please give details:	The facility has a worker committee is consisting of 18 workers. The committee head Mr. Ehab Hamdy. Last election dated 1/2023. Checked meeting of the worker's committee dated 4/06/2023 as a sample..
Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any on site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Were all site provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No accommodation is provided.

Audit Parameters						
Time in and time out	Day 1		Day 2		Day 3	
	In	08:00	In	08:00	In	08:00
	Out	16:00	Out	16:00	Out	13:00
Audit type:	PERIODIC					
Was the audit announced?	SEMI_ANNOUNCED					
Was the Sedex SAQ available for review?	Yes					
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No					
Who signed and agreed CAPR	Asmaa Halbas / Quality and Customer Service manager					
Is further information available	No					

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
<i>Reason for absence at the opening meeting</i>	No worker's union within the organization.		
<i>Reason for absence during the audit</i>	No worker's union within the organization.		
<i>Reason for absence at the closing meeting</i>	No worker's union within the organization.		

## Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers - male	1596	0	388	0	0	0	0	1984
Worker numbers - female	17	0	25	0	0	0	0	42
Total	1613	0	413	0	0	0	0	2026
Number of Workers interviewed - male	40	0	12	0	0	0	0	52
Number of Workers interviewed - female	5	0	5	0	0	0	0	10
Total - interviewed sample size	45	0	17	0	0	0	0	62

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

Worker Interview Summary	
Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Number of group interviews:	8 groups of 5
Number of individual interviews:	Male: 16 Female: 6
All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favorable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
What was the most common worker complaint?	None.
What did the workers like the most about working at this site?	Most of the workers found satisfied with the behavior of management and their legally mandated social benefits. During interviews workers gave good remarks regarding facility working condition, working timing and environment and there was no discriminatory behavior ever experienced by workers.
Any additional comment(s) regarding interviews:	None.
Attitude of workers to hours worked:	Interviewed workers were satisfied as the overtime is required voluntarily.
Is there any worker survey information available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

Attitude of workers:

Most of the workers found satisfied with the behavior of management and their legally mandated social benefits. During interviews workers gave good remarks regarding facility working condition, working timing and environment and there was no discriminatory behavior ever experienced by workers.

Attitude of worker's committee/union reps:

Interview of one worker's representative shows that the facility management cooperate with worker's committee and provides all required resources to ensure effective communication with worker's committee.

Attitude of managers:

The facility management was very receptive and showed a positive attitude towards the audit. All documents were provided on timely manner. At the end of the audit, all observations were explained and accepted by the facility. The auditors took permission for taking photographs and conducting confidential employee interviews. The facility management granted permission to conduct a full audit, including employee interviews, facility walk through and document review

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

**0A: Compliance Requirements**

0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.  
 0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights  
 0.A.3 Businesses shall identify their stakeholders and salient issues.  
 0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.  
 0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.  
 0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter. Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

**Current Systems and Evidence Examined**

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

**Current Systems:**

The company established a set of policies # PO-TM-04, issue date 02/03/2022 and covering UNGPs in a different aspects of human rights including: •Child labor, •Prevention of discrimination, •Forced labor, • Sexual harassment, •Health and safety, •Applicable with local legal and another requirement & • Grievance mechanism. •Working hours. •Wages and benefits The policies are communicated and posted at several areas in the company and therefore communicated to all staff dated 18/11/2023, is designated person responsible for implementing standards concerning human rights Eng. Ghadeer Deraz - The facility has implemented and maintained a system to follow the ETI Base Code requirements and this system was reviewed during the audit. The facility is certified ISO 9001:2015, 14001:2015, ISO 45001:2018 valid to 18/05/2026.

**Evidence examined:**

The company established a set of policies # PO-TM-04, issue date 02/03/2022 and covering UNGPs in a different aspects

**Any other comments:**

None

Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details: Policies # PO-TM-04, issue date 02/03/2022 and covering UNGPs
Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details: And having training on its last 18/11/2023.
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: Eng. Ghadeer Deraz - Compliance & Quality Manager

Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Policies # PO-TM-04, issue date 02/03/2022 and covering UNGPs
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Found in the H.R policy & procedure # PH-RAP-01 issue 3 on 24/05/2021.
<b>Measuring Workplace Impact</b>	
Annual worker turnover(Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	Last year 27.0% This year 24.0%
Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	19.0%
Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	Last year 13.0% This year 16.0%
Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month)	12.0%
Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Accidents recorded found last on 30/06/2023.
Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year 0.0% This year 0.0%

Quarterly (90 days) number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	0.0%	
Lost day work cases per 100 workers((Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	Last year	0.0%
	This year	0.0%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%

**OB - Management Systems and code Implementation**  
[Summary of Findings]

**OB: Compliance Requirements**

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

The last management review was dated 6/3/2023.  
 The last internal audit cycle took place from Sept. to Oct. 2023.  
 The company is certified with ISO 14001:2015, ISO 9001:2015, and ISO 45001:2018.  
 The company has a code of business conduct in place updated annually.  
 There is an ethical policy in the facility containing all code aspects.  
 Implementation of any necessary changes was then given to the individual department heads after agreement with the HR manager.

**Evidence examined:**

Procedures and policies updated on March. 2018, 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 last Sep. 2023

**Any other comments:**

None.

**Management Systems**

In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  Please give details:  The facility did not receive any fines or prosecutions for non-compliances to any regulations during the last 12 months.
Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details:  The facility has well organized management procedures and policies updated on January 1st, 2023, which prohibits all kinds of forced labour, child labour, discrimination, harassment & abuse.

<p>If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>The facility has effectively implemented all procedures and policies updated on January 1st, 2023. All procedures are communicated to the workers in their language such as forced labor, child labor and non-discrimination policies. Also, the facility conducted awareness training programs for all workers upon their hiring. Additionally, the facility has posted these policies on the announcement boards.</p>
<p>Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment &amp; abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>It was evident during the facility walkthrough and management and workers interviews that ETI base code was communicated with all workers, supervisors, and managers. The facility has posted the code at the announcement board.</p>
<p>If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>It was evident during the workers' interview that they are aware with the facility' policies and procedures, the facility provides managers and workers with related awareness training programs using the legal requirements and SEDEX guidelines as training material (as reference). Checked training plan for 2023.</p>
<p>Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The company is certified with ISO 14001:2015, ISO 9001:2015, and ISO 45001:2018.</p>
<p>Is there a Human Resources manager/department?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>HR department already existing to deploy, monitor and communicate HR procedure at the facility.</p>
<p>Is there a senior person /manager responsible for implementation of the code?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Asmaa Halbas / QC &amp; CS Manager</p>
<p>Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>HR policies in place updated 1st January 2023 to keep all the hiring documents and related workers information in personal files kept in safe place.</p>
<p>Is there an effective procedure to ensure confidential information is kept confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>HR procedures in place updated 1st January 2023 to keep all the hiring documents and related workers information in personal files kept in safe place.</p>
<p>Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Risk assessment for effectiveness of policy and procedures updated 1/1/2023.</p>

<p>Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Risk assessment for effectiveness of policy and procedures updated 1/1/2023.</p>
<p>Does the facility have a policy/code which require labour standards of its own suppliers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: The organization has written policies and procedures which define, address and control suppliers and contractors' activities inside the organization.</p>
<p><b>Land Rights</b></p>	
<p>Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Tax card and commercial register been checked</p>
<p>Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: The facility has a periodic check from local authorities to renew all legal permits and license. The facility has all required land rights and permissions.</p>
<p>Does the site have a written policy and procedures specific to land rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Policy and procedures specific to land rights sat according to the local laws and regulations.</p>
<p>Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: The facility land is owned to same facility owner.</p>
<p>Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: No specific land acquisition were considered.</p>
<p>Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: No evidence of illegal appropriation of land for facility building or expansion of footprint.</p>

Good Example		Evidence																		
<a href="#">[Back to findings summary]</a>																				
<table border="1"> <thead> <tr> <th colspan="2">Good Example</th> </tr> </thead> <tbody> <tr> <td>Status</td> <td>OPEN</td> </tr> <tr> <td>Reference</td> <td>ZAF600275169</td> </tr> <tr> <td>Clause</td> <td>0B - Management Systems and code Implementation</td> </tr> <tr> <td>Issue Title</td> <td>35 - Presence of relevant certifications certification that address labour rights / human rights, environmental impact or corruption (OHSAS 18001, ISO 14001, ISO 50001, ISO 37001, SA8000 etc.)</td> </tr> <tr> <td>Subcategory</td> <td>Site's licenses &amp; Certifications</td> </tr> <tr> <td>New or carried over?</td> <td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td> </tr> <tr> <td>Explanation to the good example</td> <td>The facility is certified according to ISO 14001, ISO 45001. and ISO 9001</td> </tr> <tr> <td>Evidence</td> <td>All certificates were issued by TUV Austria and valid until 2026</td> </tr> </tbody> </table>		Good Example		Status	OPEN	Reference	ZAF600275169	Clause	0B - Management Systems and code Implementation	Issue Title	35 - Presence of relevant certifications certification that address labour rights / human rights, environmental impact or corruption (OHSAS 18001, ISO 14001, ISO 50001, ISO 37001, SA8000 etc.)	Subcategory	Site's licenses & Certifications	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Explanation to the good example	The facility is certified according to ISO 14001, ISO 45001. and ISO 9001	Evidence	All certificates were issued by TUV Austria and valid until 2026	 <a href="#">Lecico Cerificates.pdf</a>
Good Example																				
Status	OPEN																			
Reference	ZAF600275169																			
Clause	0B - Management Systems and code Implementation																			
Issue Title	35 - Presence of relevant certifications certification that address labour rights / human rights, environmental impact or corruption (OHSAS 18001, ISO 14001, ISO 50001, ISO 37001, SA8000 etc.)																			
Subcategory	Site's licenses & Certifications																			
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over																			
Explanation to the good example	The facility is certified according to ISO 14001, ISO 45001. and ISO 9001																			
Evidence	All certificates were issued by TUV Austria and valid until 2026																			

**1 - Freely chosen Employment**  
**[Summary of Findings]**

**1: Compliance Requirements**

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

The company has written policies and procedures which prohibit forced, bonded, and compulsory labor, this policy was reviewed on 1/1/2023. in compliance with Egyptian labor law and ETI base code requirements.  
The facility recruited the workers by interviewing with the HR representatives and filling out application forms.  
The sampled workers stated that they are free to leave the workplace after reasonable notice, also during the facility walkthrough, all the doors are unlocked.  
HR manager is implementing an HR procedure to check the workers' original documents upon hiring and keep copies of all these documents and related workers information in their files. During the document review, there is no deposits are required, no personal documents are retained.  
It was evident during the facility walkthrough that there were no concerns regarding forced labor, migrant workers were observed, and it was confirmed during the workers' interviews.  
No kind of forced, bonded, or compulsory labor is used in the factories. The sampled workers stated that they have free access to the facility and can leave work after working hours end.  
It was evident during the factories' tours that there was no kind of forced or bonded labor. Through workers interviews (62 workers), it was observed that all the interviewed workers stated that no movement restrictions in the facility, they are free to leave the company after the working hours end, they are free to use toilets at any time, they did not pay any pre-employment fees and they keep their original hiring documents with them.  
During the facility tour, there were no signs of fear among the workers. The security guards are assigned to ensure the safety of employees and the facility and regular security jobs.

**Evidence examined:**

Policy of freely chosen and employment was 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 facility is complying with the legal requirements.

**Any other comments:**

None

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

<p>Are there any restrictions on workers' freedom to terminate employment?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: Found in the H.R policy &amp; procedure # PH-RAP-01 issue 3 on 24/05/2021. And Anti slavery policy # PO-TM-07 issued on 22/05/2021.</p>
<p>If any part of the business is UK based or registered there &amp; has a turnover over £36m, is there a published a 'modern day slavery statement'?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable</p> <p>Please give details: NA</p>
<p>Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: Found in the H.R policy &amp; procedure # PH-RAP-01 issue 3 on 24/05/2021. And Anti slavery policy # PO-TM-07 issued on 22/05/2021.</p>
<p>Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable</p> <p>Please give details: NA according H.R policy &amp; procedure # PH-RAP-01 issue 3 on 24/05/2021. And Anti slavery policy # PO-TM-07 issued on 22/05/2021.</p>
<p>Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: The facility recruited the workers through interviewing with HR Manager and filling application form by themselves and signed the labor contracts. The facility provide training for workers, supervisors and manager related to forced labor.</p>

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

**2: Compliance Requirements**

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

Written grievance policy and open-door policy updated on 01/01/2023 reviewed.  
Through the company management interview and workers' interview, it was noted that there wasn't a union in the company however there is no restriction from employers to let the workers join any external union.  
The facility has a worker committee consisting of 18 workers. The committee head Mr. Ehab Hamdy. Last election dated 1/2023. Checked meeting of the worker's committee dated 4/06/2023 as a sample.

**Evidence examined:**

Worker interview,  
Suggestions from the suggestion box and actions taken.  
Policies and procedures check.

**Any other comments:**

None.

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	<input type="checkbox"/> Union <input type="checkbox"/> Other	<input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> None
Other details:	The facility has a worker committee consisting of 18 workers. The committee head Mr. Ehab Hamdy. Last election dated 1/2023. Checked meeting of the worker's committee dated 4/06/2023 as a sample.	
Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has a worker committee consisting of 18 workers. The committee head Mr. Ehab Hamdy. Last election dated 1/2023. Checked meeting of the worker's committee dated 4/06/2023 as a sample.	
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Meeting room is provided for committee meetings.
Name of union and union representative, if applicable:	No union within the facility.
Is there evidence of free elections?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Worker's committee.
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: It was evidenced from 62 workers interviews that all workers aware of the worker's representatives.
Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date of last election:	2023-01-01
Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, please state how many:	2.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	The facility has a worker committee consisting of 18 workers. The committee head Mr. Ehab Hamdy. Last election dated 1/2023. Checked meeting of the worker's committee dated 4/06/2023 as a sample.
Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

**3: Compliance Requirements**

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

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

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

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

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

HSE policies were established on 1/2/2020 and updated annually.  
 Emergency procedure PR-HSE-07 updated 30 July 2023.  
 Environmental aspects procedures PR-E-01 issued on 2/2020 and updated annually.  
 Fire safety certificate issued by Mr. Mohamed Refaat (External consultant) updated for 2023.  
 Checked monthly inspection for firefighting equipment for Oct. 2023.  
 According to the emergency response plan, the facility maintains the following firefighting equipment:  
 103 fire hose cabinets.  
 394 fire extinguishers.  
 Underground fire water tank with a capacity of 1200 Cubic meters.  
 Fire alarm system.  
 Checked the last evacuation drill dated 11 Oct. 2023 for a daily shift which is carried out according to the emergency plan.  
 Checked training certificates for health and safety specialists dated 01/2022, first aid training dated 11/2021, and HSE technician dated 01/2022.  
 The Compressors inspection report by Comibassal dated 9/8/2023 for three compressors.  
 The lifting equipment inspection report by Comibassal dated 9/8/2023.  
 Checked permit to work procedures dated Oct. 2020 and a sample of newly issued work permit 27/11/2023 (hot work permit)  
 Checked incident analysis report dated 30/6/2023 which covers the period from 1/1/2023 till 30/6/2023 which reflects zero lost time injuries.  
 Checked the last case of medical treatment dated 17/10/2023.  
 Elevator permission is valid until 15/5/2024. Last inspection 4/7/2023.  
 Checked canteen team health certificate # 1695 which is valid until 8/5/2024.  
 Checked qualification of Nurse.  
 HSE risk assessment was established on 1/2/2020 and updated on 1/1/2023.  
 Firefighting maintenance contract with Al Ithad Company dated 4/2/2023.

**Evidence examined:**

Health, safety, and hygiene procedures and policies were reviewed.  
 Facility walk through.  
 Management interview.  
 Workers interviews.  
 Document and records were reviewed during the audit:  
 Health & Safety risk assessment.  
 Health & Safety Policy.  
 Facility licenses and permissions.  
 Health & Safety Training records.  
 H&S Internal audits.  
 Last medical check-up was.  
 Accidents and Injuries logs.  
 Last check for fire extinguishers  
 Electrical safety check report.

**Any other comments:**

None.

<p>Does the facility have general and occupational Health &amp; 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          Please give details:          HSE policies were established on 1/2/2020 and updated annually.</p>
<p>Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No          Please give details:          All policies are included in the worker's manual.</p>
<p>Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No          Please give details:          No structural additions without required permits.</p>
<p>Are visitors to the site informed on H&amp;S and provided with personal protective equipment?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No          Please give details:          The facility displays H&amp;S instructions posters at the main gate and different places within the facility, as per the norm of production processes inside the facility, PPEs are provided to be worn during the walkthrough.</p>
<p>Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined &amp; relevant comments. Include renewal/expiry date where appropriate))</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No          Please give details:          There are first aid boxes and qualified first aiders. The site has a clinic room.</p>
<p>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          Please give details:          There are first aid boxes and qualified first aiders.</p>

<p>Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>It was evident during the workers interviews that they confirmed their satisfaction concerning the transportation which they found safe, suitable, and maintained, Also, they stated that no smoking is permitted in the buses.</p>
<p>Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Workers got lockers with keys to keep their personal things.</p>
<p>Are H&amp;S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>HSE risk assessment was established on 1/2/2020 and updated on 1/1/2023.</p>
<p>Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>All legal approvals are available.</p>
<p>Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>No specific requirements as the facility customer use the (SEDEX supplier workbook and SMETA best practice guidance version 6.1/ May 2019, ETI base code).</p>

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

**4: Compliance Requirements**

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

The facility established a policy for no child labor updated on 1/1/2023. During this audit, it was evident during the checking of 62 workers' files, 62 workers' interviews, the facility tour, and management interviews that the facility does not hire child workers (under 16 years of age). As for the current audit, as declared by the human resource manager, the youngest worker is above 20 years old (YOB 2003) YOH (2023). The company does not hire or involved any kind of child labor. No evidence of child or young-looking workers during the facility tour. The employment procedure updated on 1/1/2023 included a 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. The facility keeps copies of national ID for all agent workers to ensure all above 18 years. Personal files and age proof verification documents were reviewed and included the follows:

- oCopy of birth certificate.
- oCopy of passports.
- oRecent photo.
- oCriminal Record.
- oEducational Background.

**Evidence examined:**

- Employment procedure.
- Management interview.
- Workers interviews.
- Documents and records were checked as follows:
  - oPersonal files for all workers.
  - oCopies of birthday certificates for workers.
  - oRecent photos.
  - oCriminal Records.
  - oEducational Background records.

**Any other comments:**

None.

Legal age of employment:	18
Age of youngest worker found:	20
Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Percentage of under 18's at this site (of total workers)	0.0%

Are workers under 18 subject to hazardous work assignments?

Yes  No

Please give details:

No young workers were found during this audit.

**5 - Living Wages are Paid**  
**[Summary of Findings]**

**5: Compliance Requirements**

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

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

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

The organization has written policies and procedures which define the ETI requirements, and address wages and benefits practices, and legal limits of the working hours # PO-TM-04, issue date 02/03/2022, And Found H.R policy & procedure # PH-RAP-01 issue 3 on 24/05/2021.

During this audit, 62 workers' files, attendance, and payrolls were reviewed for the sampled workers (Last paid month), (2 random month).

No extra working hours were noted or extra working days.

The organization respects the wages and benefits regulations and rules.

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

Procedure and policy are indicated that the site paid for overtime premiums as per the legal requirements as the following:

135% of workers' basic wages to workers for their daylight hour's overtime work.

170% of workers' basic wages to workers for their night hour's overtime work.

300% of workers' basic wages to workers for their weekly day off overtime work.

200% of workers' basic wages to workers for their holiday overtime work.

Workers' basic wages were paid based on the local minimum wage standard of 3000 EGP/month, the minimum salary detected was 3300 EGP/ Month; this was evident during the documents and records review.

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

It was evident during the documents review that there are no illegal or unauthorized deductions were observed.

**Evidence examined:**

The employment procedure was reviewed H.R policy & procedure # PH-RAP-01 issue 3 on 24/05/2021. The facility complies with legal requirements for wages and benefits, the following documents & records were checked.

Payrolls Records.

Deduction records.

Attendees' records.

Incentive records,

Interviews.

**Any other comments:**

None.

**Summary Information**

Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 48.0 Per Month: 208.0	Actual Per Day: 8.0 Per Week: 48.0 Per Month: 208.0	NO
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 2.0 Per Week: 12.0 Per Month: 12.0	Actual Per Day: 2.0 Per Week: 12.0 Per Month: 0.0	NO
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: 3000.0	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 3000.0	NO
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 135.0 Per Week: null Per Month: null	Actual Per Day: 135.0 Per Week: 0.0 Per Month: 0.0	NO
<b>Wages Analysis:</b>			
Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	62 workers' files, attendance, and payrolls were reviewed for the sampled workers (Last paid month), (2 random month), checked during the audit,		
Are there different legal minimum wage grades? If Yes, please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details:		
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input checked="" type="checkbox"/> Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	3300		
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 0.0% of workforce earning minimum wage 100.0% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	Bonus Scheme found:None. Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.		
What deductions are required by law e.g. social insurance? Please state all types:	Only Income taxes & Social insurance,		
Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

Please list all deductions that have been made.	Only Income taxes & Social insurance,
Please list all deductions that have not been made.	None.
Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Work time register automatically by Magnetic Cards / machines.
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation <input type="checkbox"/> Other - please give details:
Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Annually
Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: H.R records & interviews.
How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other

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

**6: Compliance Requirements**

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

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

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

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

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

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

During this audit, 62 workers' files, attendance, and payrolls were reviewed for the sampled workers in Nov. 2023 (Last paid month), October 2023 (random month), and Sep. 2023 (random month). No extra working hours were noted or extra working days.  
Factory working in 3 shifts, the normal Working hours:  
24 hours – 6 days per week,

The facility uses automatic attendance records to record workers' attendance. It was evident during the worker's interview and documents review that overtime is rare, and it is voluntarily; information from worker interviews coincides with time and payroll records.

The facility is working in three shifts as following:  
Shift 1: From 08:00 AM to 04:00 PM.  
Shift 2: From 04:00 PM to 12:00 PM.  
Shift 3: From 12:00 PM to 08:00 AM.  
Each worker has one day off after 6 working days,

**Evidence examined:**

Employment procedure was reviewed.  
Documents and records review included attended sheet and production records were checked.  
Attended time records for payrolls records were reviewed during the audit.  
Worker's interview.

**Any other comments:**

None.

**Working hours' analysis**

**Systems & Processes**

What timekeeping systems are used? Automatically Magnetic Card.

Is sample size same as in wages section?  Yes  No

Please give details:

Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No (please explain)
Is this allowed by local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Maximum number of days worked without a day off (in sample):	6
<b>Standard/Contracted Hours worked</b>	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No % of workers: null% Frequency:
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Overtime Hours worked</b>	
Actual overtime hours worked in sample (State per day/week/month)	NA
Combined hours (standard or contracted + overtime hours = total) over 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: NA
Approximate percentage of total workers on highest overtime hours:	0.0%
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information Please give details: Na
<b>Overtime premium</b>	
Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A - there is no legal requirement to OT premium Please give details: NA

Is overtime paid at a premium?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay <input type="checkbox"/> Collective Bargaining agreements <input checked="" type="checkbox"/> Other
Please give details	NA
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other)	<input checked="" type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week is voluntary <input checked="" type="checkbox"/> Safeguards are in place to protect worker's health and safety <input checked="" type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify)
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	According to the H.R Policies no forced OT, calculated within the local laws,
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

**7 - No Discrimination is Practiced**  
**[Summary of Findings]**

**7: Compliance Requirements**

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

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

**Evidence examined:**

The employment procedure was reviewed.  
Management interview  
Worker's interview.  
Documents and records were reviewed as follows:  
Application form.  
Grievance and suggestion box.

**Any other comments:**

None.

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 98.0%	Female: 2.0%	
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	3		
Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	<input type="checkbox"/> Hiring  <input type="checkbox"/> Promotion	<input type="checkbox"/> Compensation  <input type="checkbox"/> Termination or retirement	<input type="checkbox"/> Access to training  <input checked="" type="checkbox"/> No evidence of discrimination found
Please give details	None.		
Professional Development			
What type of training and development are available for workers?	HSE training		
Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

**8 - Regular Employment Is Provided**  
[Summary of Findings]

**8: Compliance Requirements**

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

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

**Additional Elements: Responsible Recruitment**

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

Work performed was based on recognized work relationships established through national law and practice.

All workers signed the labour contracts with the facility upon their hiring (on the first day of work).

As for the current audit, it is found that the company complies with applicable requirements of labour law 12/2003 and ETI.

All workers are hired directly by the company.

All permanent workers signed a contract with the company.

All permanent workers are covered by the social insurance.

No migrant workers.

All workers are Egyptian.

No home workers.

No seasonal workers.

No subcontractor was used.

No outsourcing for any processes.

**Evidence examined:**

HR 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.

**Any other comments:**

None.

**Responsible Recruitment**

All Workers

Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	<input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Same as actual conditions <input checked="" type="checkbox"/> Understood by workers presented
Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Migrant Workers</b>	
Type of work undertaken by migrant workers:	No Migrant worker's were found during this audit.
Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0
Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No Migrant worker's were found during this audit.
Is there any observation on this finding?	No Migrant worker's were found during this audit.
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Non-employee workers</b>	
<b>Recruitment Fees</b>	
Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>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.)</b>	
Number of agencies used (average):	4
Please provide the names of agencies if applicable	Saini for general services (contract dated 1/1/2023), Target (Contract dated 1/1/2023), Island (Contract dated 1/1/2023), and Ecothis (contract 1/1/2023)
Were agency workers' age / pay / hours included within the scope of this audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were sufficient documents for agency workers available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there a legal contract agreement with all agencies?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Saini for general services (contract dated 1/1/2023), Target (Contract dated 1/1/2023), Island (Contract dated 1/1/2023), and Ecothis (contract 1/1/2023)
Does the site have a system for checking labour standards of agencies?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All agencies workers are provided copies of ID and record their working time by security.

<p><b>Contractors (Contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider.)</b></p>	
<p>Any contractors on site?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: No contractors within the facility.</p>
<p>Do all contractor workers understand their terms of employment?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: No contractors within the facility.</p>

**8A - Sub-Contracting and Homeworking**  
**[Summary of Findings]**

**8A: Compliance Requirements**

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

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

No subcontractors are used within the facility

**Evidence examined:**

No subcontractors are used within the facility

**Any other comments:**

No subcontractors are used within the facility

**Summary of sub-contracting – if applicable**

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

**Summary of homeworking – if applicable**

Is homeworking used at this site?     Yes     No



<p>Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:</p>
<p>Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:</p>
<p>If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:</p>
<p>Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:</p>

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

**10A: Compliance Requirements**

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

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:**

The facility does not have any migrant workers. All the facility workers are Egyptians.  
The company has a copy of valid laws and regulations on employment & understands its requirements.  
Hiring documents.  
Worker's interview  
Site Tour  
Management interviews.

**Any other comments:**

None.

**10B4 - Environment 4–Pillar**  
**[Summary of Findings]**

**10B4: Compliance Requirements**

- 10.B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.
- 10.B4.2 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.
- 10.B4.3 Businesses shall be aware of their end client’s environmental standards/code requirements
- 10.B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.
- 10.B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.
- 10.B4.6 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).
- 10.B4.7 Businesses shall make continuous improvements in their environmental performance.
- 10.B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation
- 10.B4.9 Businesses should have a nominated individual responsible for co-ordinating the site’s efforts to improve environmental performance.
- 10B4: Guidance for Observations
- 10.B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.
- 10.B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.

Note for auditors and readers. This environment section is intended to take not more than 0.25 auditor days. It is an assessment only and the main requirement is to establish whether a site is meeting applicable environmental laws and/or has any certifications or environmental management systems in place. Following this assessment the client/supplier may decide a full environmental audit is required (see also best practice guidance/environment and guidance for auditor)

**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 established environmental protection policy last updated on  
 The facility assigned OHS and an environmental manager.  
 The facility is certified according to the environmental management system (ISO 14001:2015) by TUV Austria, certificate valid till May. 2026  
 The facility identifies and evaluates different environmental aspects within different processes according to:  
 Environmental policy issued on 22/05/2023 &  
 Environmental aspects procedures # PR-E-01,  
 legal procedures # PR-HSE-03,  
 Waste management procedures # PR-E-02,  
 The facility performed external environmental aspects measurement by CHEMIX dated May 2023 and all results were found within legal limits of environmental law 09/2009.  
 Wastewater analysis by the Ministry of Higher Education Central Laboratory dated 20/08/2023 as per test report # 46539/23 shows all test results with acceptable Law # 44/2000 limit.  
 Drinking water analysis dated 13-8-2023 as per report # 46538-23 and all results are within MD 458/2007.

**Evidence examined:**

Environmental management system documentation.  
 All legally required environmental documents were provided for review.  
 Environmental policy issued on 22/05/2023 &  
 Site tour

**Any other comments:**

None.

Environmental Analysis	
Is there a manager responsible for Environmental issues (Name and Position):	The facility assigned OHS & Environmental manager (Mr. Moneer Otiba)
Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Enviromental aspects register including the life cycle # F-E-01-02last update 01/02/2020,
Does the site have a recognised environmental system certification such as ISO 14000 or equivalent?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: (ISO 14001:2015) by TUV Austria, certificate valid till May. 2026
Does the site have an Environmental policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, is it publicly available?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: According Environmental policy issued on 22/05/2023 & Enviromental aspects procedures # PR-E-01, Legals procedures # PR-HSE-03, Waste management procedures # PR-E-02,
Does the site have a Biodiversity policy?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: None.
Have all legally required permits been shown?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: EIA measurements, EEAA permits,
Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Please give details: List has 19 items last update 08/12/2023,
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Environmental declaration found from IDA last on 30/12/2018,
Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The reduction target in place as a part of ISO 14001 certification.

Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All packaging material are recycled and monitored on monthly base.	
Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Monthly	
Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: None.	
Usage/Discharge analysis		
Criteria	Previous year: 2022	Current year: 2023
Electricity Usage: Kw/hrs	20836164	14516195
Renewable Energy Usage: Kw/hrs	0	0
Gas Energy Usage: Kw/hrs	124808352	80197483
Has site completed any carbon Footprint Analysis?	Yes	No
If Yes, please state result	0	
Water Sources	Public Source	Public Source
Water Volume Used	202010	185294
Water Discharged	Water Volume Discharged: (m <sup>3</sup> )Max Capacity 100 m/h but normal work being as per production condition	Water Volume Discharged: (m <sup>3</sup> )Max Capacity 100 m/h but normal work being as per production condition
Water Volume Discharged	0	0
Water Volume Recycled	202010	185294
Total waste produced	15000 tons	8300 tons
Total hazardous waste produced	2.8 tons	3 tons
Waste to recycling	0	0
Waste to landfill	2.8 tons	3 tons
Waste to other	7 Tons	6.5 Tons
Total Product Produced	73500 tons	54000 tons

**10C - Business Ethics – 4-Pillar Audit**  
**[Summary of Findings]**

**10C: Compliance Requirements**

- 10.C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.
- 10.C.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.
- 10.C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.
- 10.C.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.
- 10.C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,
- 10.C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics
- 10.C.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
- 10.C.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.
- 10.C.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

Note for auditors and readers. This Business Ethics section is intended to take not more than 0.25 auditor days. It is an assessment not an audit.

**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:**

Anti-bribery and corruption policies were established on 27/09/2020 and reviewed annually. The Factory administrative manager Mr. Hesham Zyada is the designated person responsible for implementing standards concerning Business Ethics, and site practices were conducted without any corruption and/or bribery. The company established a business ethics policy which was communicated to workers through posters and training. Grievance mechanism in place.

**Evidence examined:**

The company business ethics policy including:  
Bribery  
Corruption

**Any other comments:**

None.

Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?

- Internal Policy
- Policy for third parties including suppliers

Please give details:

Anti-bribery and corruption policies were established in 27/09/2020 and reviewed annually.

<p>Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Last training provided dated 18/11/2023.</p>
<p>Is the policy updated on a regular (as needed) basis?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Annually</p>
<p>Does the site require third parties including suppliers to complete their own business ethics training</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: All suppliers signed code of ethics as part of their contracts.</p>

## Attachments



[Signed CAPR.pdf](#)



[Pictures.zip](#)



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

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

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