



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC413817111	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS413817685	
Business name (Company name):	WADI EL NILE FOR FOOD INDUSTRIES			
Site name:	WADI EL NILE FOR FOOD INDUSTRIES			
Site address:	EL KILO 84 CAIRO- ALEXANDRIA DESERT AL MENOFIA NA EG	Country:	EG	
Site contact and job title:	Sameh Salah / Quality and Compliance Manager			
Site phone:	01111115049	Site e-mail:	Ahmed.AdelAhmed@outlook.com	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar	<input type="checkbox"/> Business Ethics
Date of Audit:	2024-01-15			

Audit Company Name:
GSCS International Ltd

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:	Amany ElHabashi	APSCA Number:	21702298
Additional Auditors:			
Date of declaration:	2024-01-15		

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:	Sameh Salah
Title:	Quality and Compliance Manager
Date of declaration:	2024-01-15
Comments:	<p><i>Any exceptions to this must be recorded here (e.g. different sample size):</i> <i>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).</i> <i>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></p>
None	

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	
<u>0A - Universal rights covering UNGP</u>	0.A.1		0	1	0	Obs - ZAF600313017
<u>0B - Management systems and code implementation</u>			0	0	0	
<u>1 - Freely chosen employment</u>			0	0	0	
<u>2 - Freedom of association and right to collective bargaining are respected</u>			0	0	0	
<u>3 - Working conditions are safe and hygienic</u>	3.1 3.1 3.1 3.1 3.1 3.1 3.2 3.2		8	0	0	NC - ZAF600313018 NC - ZAF600313019 NC - ZAF600313020 NC - ZAF600325853 NC - ZAF600325854 NC - ZAF600325855 NC - ZAF600325856 NC - ZAF600325857
<u>4 - Child labour shall not be used</u>			0	0	0	
<u>5 - Living wages are paid</u>			0	0	0	
<u>6 - Working hours are not excessive</u>			0	0	0	
<u>7 - No discrimination is practiced</u>			0	0	0	
<u>8 - Regular employment is provided</u>	8.2	§1	1	0	0	NC - ZAF600325852
<u>8A - Subcontracting and homeworking</u>			0	0	0	
<u>9 - No harsh or inhumane treatment is allowed</u>			0	0	0	
<u>10A - Entitlement to work and immigration</u>			0	0	0	
<u>10B2 - Environment 2-pillar</u>			0	0	0	
<u>10B4 - Environment 4-pillar</u>			0	0	0	
<u>10C - Business ethics 4-pillar</u>			0	0	0	

Local Law Issues

Issue	Description
§1	Egyptian Medical insurance law # 111

Site Details

Site Details		
Company Name	WADI EL NILE FOR FOOD INDUSTRIES	
Site Name	WADI EL NILE FOR FOOD INDUSTRIES	
GPS location (if available)	GPS Address:	Kilo 84, Cairo Desert, Alexandria, Al-Khattaba Entrance, Sadat, Menoufia, Egypt.
	Coordinates:	30.3291630, 306548210
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Operation license No.: 412019121100002 , Issue date: 11/12/2019 Industrial certification No.: 2013/39156 , Issue date: 18/09/2019 Commercial record: 53983 Tax card: 378-926-896 , Issue date: 20/09/2021 and Expiry date: 19/09/2026	
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacturing of olives and pickles such as green olives, black olives, mixed pickles and all types of pickled products and packing in cans, jars and barrels and paper, mixed pickles, artichoke, cucumber, and Grape leaves.	
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	SMETA 2P – full Initial audit was conducted by Amany Elhabashy (CSCA 21702298) within one MD and assessed facility against ETI base code and Egyptian Local law requirements on a sampling basis. -Auditor entered the facility and was welcomed by the site management, then an opening meeting was held on 15 January 2024 at 08:45 AM and start the opening meeting directly. WADI EL NILE FOR FOOD INDUSTRIES is located Kilo 84, Cairo Desert, Alexandria, Al-Khattaba Entrance, Sadat, Menoufia, Egypt; it was established in 2012 Its ownership is privately owned company - Total land area for factory equal 6 Acres. - WADI EL NILE FOR FOOD INDUSTRIES is specialized in Manufacturing of olives and pickles such as green olives, black olives, mixed pickles and all types of pickled products and packing in cans, jars and barrels and papper, mixed pickles, artichoke, cucumber, and Grape leaves. There is peak Seasn at factory starting from September till December of each year. There is no homeworker and there is no Subcontractor.	

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: There is no any accomodation provided for the workers.

Audit Parameters		
Time in and time out	Day 1	
	In	09:00
	Out	17:30
Audit type:	PERIODIC	
Was the audit announced?	ANNOUNCED	
Was the Sedex SAQ available for review?	No	
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	Yes There is no SAQ reviewed during the audit	
Who signed and agreed CAPR	Sameh Salah / Quality and Compliance Manager	
Is further information available	Yes	

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	No	No
B: Present at the audit?	Yes	No	No
C: Present at the closing meeting?	Yes	No	No
<i>Reason for absence at the opening meeting</i>	There is no registered union in the facility or worker representative according to the local law of Egypt, workers are allowed to form unions or elect worker committee / representative and in case there is no union worker council committee or joint work council should be present as alternative		
<i>Reason for absence during the audit</i>	There is no registered union in the facility or worker representative according to the local law of Egypt, workers are allowed to form unions or elect worker committee / representative and in case there is no union worker council committee or joint work council should be present as alternative		
<i>Reason for absence at the closing meeting</i>	There is no registered union in the facility or worker representative according to the local law of Egypt, workers are allowed to form unions or elect worker committee / representative and in case there is no union worker council committee or joint work council should be present as alternative		

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	60	30	0	0	0	0	0	90
Worker numbers - female	5	0	0	0	0	0	0	5
Total	65	30	0	0	0	0	0	95
Number of Workers interviewed - male	5	3	0	0	0	0	0	8
Number of Workers interviewed - female	2	0	0	0	0	0	0	2
Total - interviewed sample size	7	3	0	0	0	0	0	10

Nationalities Structure	
Nationality of Management	Egyptian
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1: Egyptian approx %: 100%
Was this list completed during peak season?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: During the Peak Season, number of workers (temporary workers are increased that may exceed 25 workers).
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: There is no other payment cycle at place.

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:	1 group x 4 male workers
Number of individual interviews:	Male: 4 Female: 2
All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favorable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
What was the most common worker complaint?	There were no complaints raised by the interviewed workers. The workers' interviews showed that, workers have positive attitude towards the company, confirmed good working conditions, and stated that salaries are paid on time.
What did the workers like the most about working at this site?	The issue which the workers like most is that Free transportation provided and payment on time.
Any additional comment(s) regarding interviews:	The interviews were conducted in the private room. The workers were free to speak with the auditor and they seemed not to be coached by management.
Attitude of workers to hours worked:	All workers are satisfied towards the working hours.
Is there any worker survey information available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

Attitude of workers:
There were no complaints raised by the interviewed workers. The workers' interviews showed that workers have positive attitude towards the facility, confirmed good working conditions, and stated that salaries are paid on time.
Attitude of worker's committee/union reps:
There is no workers representative or worker union at the facility.
Attitude of managers:
The facility management was found to be cooperative throughout the audit and had a positive attitude towards the auditors' team.

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

0A: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

1. The site has implemented and maintained a system to be in compliance with the ETI Base Code requirements and this system was reviewed during the audit.
2. Human rights policy and procedure were updated on 25/12/2022 which covers human rights impacts and issues. HR Manager ensures that the policy is communicated to all appropriate parties, including its own suppliers through verbal communication over the phones.
3. The site has a transparent system in place for the confidential reporting and dealing with the human rights impacts and issues without any fear of reprisals. The site has grievance mechanism, which allows workers to use the grievance box freely for any complaints, in order to report any situation or case related to human rights.
4. The site has designated Mr. Elshahed Mohamed / HR Manager to be responsible for communicating the human rights policy at the site.

Evidence examined:

1. Human rights procedure updated on 25/12/2022 to cover all the human rights impacts and issues and to keep the workers' information in their personal files on confidentiality basis, this information was reviewed during the audit.
2. The facility communicated the policy with their suppliers through sending them the related policies and contracts as per legal requirements as well as through verbal communication over the phones.
3. The facility communicates the human rights policy with the workers inside the workplace through verbal communication up on hiring (induction and refresher trainings).

Any other comments:

None.

Policy statement that expresses commitment to respect human rights?

Yes No

Please give details:

The facility is committed to respect the human rights as it has a policy updated on 25/12/2022 , covered all the human rights impacts and issues.

<p>Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>These policies are included in the workers' manual in their language and they received awareness training program related to these policies</p>				
<p>Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Sameh Salah/Quality and Compliance Manager,</p>				
<p>Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The site has a transparent system in place for the confidentiality reporting and dealing with the human rights impacts and issues without any fear of reprisals. The site has grievance mechanism which allows the workers to use the grievance box freely.</p>				
<p>Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>				
<p>Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The site has a policy updated 25/12/2022, and the site appoints Mr. Elshahed Mohamed /HR manager, who is responsible for HR stated that all the workers' information is kept in their personnel files and this information is confidential.</p>				
<p>Measuring Workplace Impact</p>					
<p>Annual worker turnover(Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))</p>	<table border="0"> <tr> <td>Last year</td> <td style="text-align: right;">0.0%</td> </tr> <tr> <td>This year</td> <td style="text-align: right;">0.0%</td> </tr> </table>	Last year	0.0%	This year	0.0%
Last year	0.0%				
This year	0.0%				
<p>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])</p>	<p>0.0%</p>				
<p>Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)</p>	<table border="0"> <tr> <td>Last year</td> <td style="text-align: right;">0.0%</td> </tr> <tr> <td>This year</td> <td style="text-align: right;">0.2%</td> </tr> </table>	Last year	0.0%	This year	0.2%
Last year	0.0%				
This year	0.2%				

Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month)	0.05%
Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Accidents and injury record updated on Dec 31st, 2023 was reviewed during the documents review. As per the Egyptian Labour law article# 228 that all industrial establishment employing 50 workers or more, and all non- industrial establishment employing fifty workers or more shall provide the concerned manpower directorate with a semi-annual statistical statement on the diseases and injuries, during the first half of the months of July and January at most. The last updated injury records were reviewed. It was the formal one which is delivered to the legal social insurance office, which is stating that there are no injuries at the facility.
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%

Observation		Evidence
[Back to findings summary]		
Observation		
Status	OPEN	
Reference	ZAF600313017	
Clause	0A - Universal Rights covering UNGP	
Issue Title	7 - SAQ was shared with the auditor, but the SAQ answers are purposefully misleading / inaccurate	
Subcategory	Audit process	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA413817755	
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	N/A	
ETI code	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.	
Explanation to the observation	The SAQ « Self-Assessment Questionnaire” wasn't Completed in the SEDEX platform by the company.	
Actions	N/A	

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

0B: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

1. The facility implement and maintain systems to deliver compliance with this Code.
2. The company operates legally in workplaces with the correct commercial licenses and permits and they have systems in place to ensure compliance with all relevant land rights.
3. The company has appointed Mr. Mohamed Adel as responsible for compliance with the Code.
4. The company communicates this code to all employees through an announcement board and trainings.
5. The Company communicates this code to all suppliers and informs them orally by phone to extend the principles of this Code of Ethics

Evidence examined:

1. Procedures and policies updated on 25/12/2022 were reviewed.
2. Declaration to appoint a management representative to be responsible for compliance with ETI Base Code was reviewed.
3. Workers interviews.
4. Management interview.
5. Training Records were reviewed.

Any other comments:

None.

Management Systems

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 site was written by Policies updated on 25/12/2022 banning all types of forced labour and child labour, Discrimination, harassment and abuse.
If Yes, is there evidence (an indication) of effective implementation? Please give details.	communicated to the workers in their language such as forced labour, child labour and non-discrimination policies.

<p>Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>it was evident during the site walkthrough and management and workers interviews that ETI base code was communicated with all workers, supervisors and managers.</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).</p>
<p>Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility was not certified for any management system only BRC and Halal certificates at place.</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>Elshahed Mohamed /HR manager is implementing HR procedure to keep all the hiring documents and related workers information in personal files kept in safe place.</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 25/12/2022 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 policies in place updated 25/12/2022 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>The site is implemented annually Risk assessment to cover human rights items and updates to all its policies and procedures to verify their effectiveness.</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:</p> <p>The site has process to do a remediation plan and corrective actions towards any issues raised during the risk assessment process.</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:</p> <p>The site has a policy in place, which is communicated with them suppliers through sending them the related policies and contracts as per legal requirements as well as through verbal communication over the phone.</p>
<p>Land Rights</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:</p> <p>The site is owned by the site owner and he have all the land rights. Also, the site has valid and updated land rights license.</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:</p> <p>The facility is owned by the facility owner and he has all the land rights. Also, the facility has valid and updated land rights license. The facility is owned by the facility owner and he has all the land rights. Operation license No.: 412019121100002 , Issue date: 11/12/2019 Industrial certification No.: 2013/39156 , Issue date: 18/09/2019 Commercial record: 53983 Tax card: 378-926-896 , Issue date: 20/09/2021 and Expiry date: 19/09/2026</p>
<p>Does the site have a written policy and procedures specific to land rights?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has a periodic check from local authorities in order to renew all legal permits and license. The facility has all required land rights and permissions as following: Operation license No.: 412019121100002 , Issue date: 11/12/2019 Industrial certification No.: 2013/39156 , Issue date: 18/09/2019 Commercial record: 53983 Tax card: 378-926-896 , Issue date: 20/09/2021 and Expiry date: 19/09/2026</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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>The site is owned by the site owner and he have all the land rights</p>

Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: All the legal permits and licenses of the site were up to date and were available during the audit for review.
Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No such evidence was noted during the audit process or noted during the site tour or documents review, all the legal permits and licenses of the site was up to date and were available during the audit for review.

1 - Freely chosen Employment
[Summary of Findings]

1: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- 1-The factory has written policy and procedure dated on 25/12/2022 to be in compliance with the Egyptian labour law and ETI base code requirements.
- 2-The sampled workers stated that they are free to leave the workplace after reasonable notice, also during the factory walkthrough, all the doors are unlocked.
- 3- Mr. Elshahed Mohamed / HR Manager is implementing HR procedure to check the workers' original documents upon hiring and keep copies of all these documents and related workers information in their personal files.
- 4-During the documents review, there is no deposits are required, no personal documents are retained.

Evidence examined:

- Policy of freely chosen and employment procedure updated on 25/12/2022 were reviewed.
- Work contracts were reviewed for all workers to ensure noticed periods; each worker receives a copy of signed contract by both parties.
- Personal files were reviewed for workers to review the workers hiring documents (copy of birth certificate, copy of ID cards, copy of signed contract).
- Workers interview showed that overtime applied at this facility is complying with the legal requirements.
- Management interview

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:
Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No such case found during the workers interviews, as the workers are free to terminate their work contract with reasonable notice and time.

<p>If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable</p> <p>Please give details: Not applicable.</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: No restrictions on workers' freedoms to leave the site at the end of the work day</p>
<p>Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p> <p>Please give details: The facility understands the risks of the forced / trafficked / bonded labour in its supply chain as the management and the workers are aware about ETI Base Code principles.</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 labour contracts. The facility provide training for workers, supervisors and manager related to forced labour.</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:

- 1- The factory has written policies and procedures dated on 25/12/2022, they are in compliance with the legal law.
- 2- The factory doesn't have a trade union or worker representatives but have open door policy and grievance box to communicated with the top management.
- 3- It was evident during the workers interview that the above mechanism is communicated with the open-door policy and grievance policy as they confirmed that they are have the total free access to use these two communication methods with factory management

Evidence examined:

- 1. Written grievance policy and open-door policy dated on 25/12/2022 were reviewed.
- 2. During the workers' interview, they stated that they have positive attitude towards the factory and there were no complaints raised by them.
- 3. Management interview.
- 4. site tour

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 type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> None
Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All the workers are communicated with the management through 1 grievance box which are located in the canteen area and lockers room for any complaints/ suggestions. The factory also has an open-door policy, which allows all the workers to talk to the management freely.	
Is there evidence of free elections?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is no workers' representative or union representatives in the site.
Name of union and union representative, if applicable:	There is no workers' representative or union representatives in the site.
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?	There is no workers' representative or union representatives in the site.
Is there evidence of free elections?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
Are all workers aware of who their representatives are?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is no workers' representative or union representatives in the site.
Were worker representatives freely elected?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Date of last election:	null
Do workers know what topics can be raised with their representatives?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were worker representatives/union representatives interviewed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	There is no workers' representative or union representatives in the site.
Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

3: Compliance Requirements

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

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

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

- 1.The facility provided safe and hygienic working environment according to the risk assessment plan and hazard identification procedure updated on 25/12/2022, also checked health & safety records such as emergency preparedness and response procedure which updated in 25/12/2022 and health & safety work instructions which updated on 25/12/2022were reviewed.
2. Health & safety policy and procedures updated on 25/12/2022, procedures such as the emergency preparedness and response procedure, health & safety work instructions, accident & emergency work instruction, all these policies and procedure were reviewed.
- 3.The facility has provided clean toilet facilities and potable water and provided sanitary facilities for food storage.
- 4.The organization has well organized internal monitoring system. The facility conducts periodically internal monitoring covering H&S and fire safety, last internal audit was done in October 2023.
- 5.The organization has a well-trained health and safety team which is headed by Mr. Sameh Salah/Quality and Compliance Manager,
- 6.The company assigned Mr. Sameh Salah/Quality and Compliance Manager, and Mr. Khaled Hamdy/Factory Manager to monitor the environmental issues and chemical safety inside the organization.
- 7.The organization has well ventilated workstations and temperature was in good and acceptable limits. The buildings are in good condition and there were no signs of cracks or construction problems.
- 8.Buildings safety check reports were done externally by authorized party.

Safety and Health Program:

- 9.The organization has a well-trained health and safety team who is headed by Mr. Sameh Salah/Quality and Compliance Manager, and Mr. Khaled Hamdy/Factory Manager.
- 10.The organization has well trained Health and safety committees covering the factory who were assigned and chosen according to their qualifications and certificates as mentioned in the Egyptian labor law 12/2003. The facility has its own committee which held monthly meetings.

Fire safety

- 11.The organization has sufficient number of fire-fighting equipment.
- Fire extinguishers
Fire hose reels
Fire alarm push buttons

- 12.First aid kit was available at site.
- 13.The emergency response plan was last reviewed and updated.
- 14.Fire extinguishers inspection is done internally on monthly basis by the HSE team and done externally each three months by third party

Trainings

15.the facility was trained all workers at several programs of Safety Such as Fire fighting system dated 16/09/2023, First aiders dated 16/12/2023, hazard Waste management dated 07/10/2023, hygiene & cleaning dated 16/08/2023, and Chemical management dated 16/08/2023.

The last updated fire drills for facility on 22/11/2023, took 2:21 minutes.

Evidence examined:



1. Health, safety and hygiene procedures and policies were reviewed.
3. Facility walkthrough.
4. Management interview.
5. Workers interviews.
6. 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 & 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</p> <p>Please give details:</p> <p>Health & safety policy and procedures updated on 25/12/2022, procedures such as the emergency preparedness and response procedure, health & safety work instructions, accident & emergency work instruction, all these policies and procedure were reviewed.</p>
<p>Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Handbook Manual & all policies are posted in different area</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</p> <p>Please give details:</p> <p>There is no structural additions without required permits/inspections</p>
<p>Are visitors to the site informed on H&S and provided with personal protective equipment?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility displays H&S instructions posters at the main gate and at prominent places within the facility, As per the norm of production processes inside the facility, 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 & relevant comments. Include renewal/expiry date where appropriate))</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>First aid kits available at site with first aiders, as well as the facility has agreement with a hospital that far from less than 5 kilometers. The medical room is not provided for the workers in the facility as per Egyptian Labour Law no. 12/2003, article no. 220 that the site shall provide the first aid means for its workers, If the number of the establishment's workers in the same place, or the same town , or in a circle with a radius of fifteen kilometers' exceeds fifty workers, the establishment shall employ one or more qualified male nurses for nursing or first aid services in each shift of work at the facility, charge a doctor to visit them at the place provided by the facility for that purpose, and given them the medicines necessary for treatment free of charge.</p>
<p>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</p> <p>Please give details:</p> <p>The facility has trained first aiders (5 first aiders) and accessible first aid boxes (04 boxes).</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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>There was no dormitory provided for the workers</p>
<p>Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>The last H&S risk assessment has been done on 25/12/2022 which covers all the processes in place but it was evident during the documents review that the risks and hazards analysis report did not cover the fire risks in the facility.</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>The facility conducts the environmental measurements on regular basis and the last report was done on 22/01/2022 by Environmental studies and research institute / Alexandria University.</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>

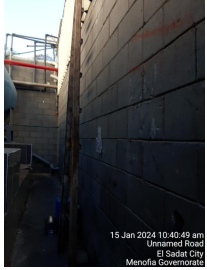

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	CLOSED	
Reference	ZAF600313018	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	198 - No system in place to verify functionality of smoke detectors, alarms, emergency exit signage, firefighting equipment, etc.	
Subcategory	Fire Safety - Fire alarms & Evacuation	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA413817755	
Resolved by audit	ZAA600043954	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	It was evident during facility walkthrough that emergency exit door was not provided with the emergency operated light or signs.	 Emergency light-2.jpg
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It was observed during the audit on 15/01/2024, the facility fix emergency light and sign at emergency exit doors. The facility was	 Emergency light.jpg
Additional comments	It was observed during the audit on 15/01/2024, the facility fix emergency light and sign at emergency exit doors. The case was closed out during SMETA 2 P audit that were carried out on 15/01/2024 through site tour, documentation review and management interview.	


--	--

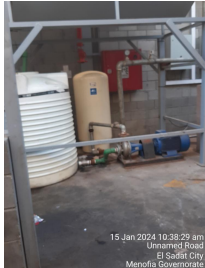
Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	CLOSED	
Reference	ZAF600313019	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	162 - No / inadequate health and safety training provided to workers in relation to processes which may cause serious injury or death - isolated	
Subcategory	Health & Safety Training	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA413817755	
Resolved by audit	ZAA600043954	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
ETI code	3.2 - Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.	
Explanation to the non compliance	It was evident during the workers interviews and documents review that fire safety training program was not provided to workers	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	There is no system provided for workers related to the safety	
Additional comments	It was observed during the smeta 2 Audit that were carried out on 15/01/2024; the facility was trained all workers at several programs of Safety Such as Fire fighting system dated 16/09/2023, First aiders dated 16/12/2023, hazard Waste amangement dated 07/10/2023, hygiene & cleaning dated 16/08/2023, and Chemical management dated 16/08/2023.	


Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	CLOSED	
Reference	ZAF600313020	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	162 - No / inadequate health and safety training provided to workers in relation to processes which may cause serious injury or death - isolated	
Subcategory	Health & Safety Training	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA413817755	
Resolved by audit	ZAA600043954	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
ETI code	3.2 - Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.	
Explanation to the non compliance	It was evident during the workers interviews and documents review that Chemical Safety Handling training program was not provided to the workers.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	There is no training provided at place.	
Additional comments	It was observed during the smeta 2 Audit that were carried out on 15/01/2024; the facility was trained all workers at several programs of Safety Such as Fire fighting system dated 16/09/2023, First aiders dated 16/12/2023, hazard Waste amangement dated 07/10/2023, hygiene & cleaning dated 16/08/2023, and Chemical management dated 16/08/2023.	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600325853	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	228 - Unsafe handling of electrical equipment e.g. no rubber mats in front of electricity panels	
Subcategory	Electrical risk	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	It was observed from the documentation review; site tour and management interview; there is no rubber mat in front the electrical panels that located at pitting and slicing section	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	The facility shall review all electrical panel and validate a rubber mat in front of all.	
		 <p><u>Pitting and slicing section- Electrical panel-2.jpg</u></p>  <p><u>Pitting and slicing section- Electrical panel.jpg</u></p>

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600325854	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	269 - No / inadequate policy for on-going control management / inspection / maintenance of machinery	
Subcategory	Machinery	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	It was observed during the site tour, documentation review and management interview; there is no effective inspection applied for wooden ladders used at factory.	 <p>ladders inspection - 2.jpg</p>
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	The facility shall remove all wooden ladders from place and include it at daily inspection records of safety team to ensure there is no risk at place.	 <p>Ladders inspection-01.jpg</p>

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600325855	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	187 - Fire extinguishers not inspected / checked regularly / out of date	
Subcategory	Fire Safety - Fire Fighting Equipment	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	It was observed during the site tour, management interview and workers interview; there is frequently inspection applied for the fire extinguisher found at production hall or even records kept at OHD checklist.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	The facility shall review all fire extinguisher and keep monthly records	
		
		Fire extinguisher missing inspection.jpg

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600325856	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	188 - Fire extinguishers incorrectly installed, e.g. placed at an inappropriate height / on floor	
Subcategory	Fire Safety - Fire Fighting Equipment	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	It was observed during the site tour, documentation review and managment interview there is a blocked fire hose box at utilities area.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	The facility shall replace and change the place of fire hose box.	
		 <p>15 Jan 2024 10:38:29 am Unnamed Road El Sadat City Matrofia Governorate</p>
		Blocked fire hose box.jpg

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600325857	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	241 - No / inadequate spill kit provided for handling chemical spillage and leakage	
Subcategory	Chemicals	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	It was observed from the site tour, workers interview, and management interview; there is no spill kit at place of solar tank.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	The facilities hall validate spill kit at place.	
		 <p><u>No Spill kit at solar tank.jpg</u></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:

- 1.The company does not hire or involved in any kind of child labor. No evidence of child or young-looking workers during the factory tour.
- 2.Employment procedure updated on 01/10/2023; 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
- 3.The facility has checked workers' original national ID cards at the time of recruitment and kept a copy in their personal files.
- 4.Personal files and age proof verification documents were reviewed and included the follows:
 - a.Copy of birth certificate.
 - b.Copy of passports.
 - c.Recent photo.
 - d.Criminal Record.
 - e.Educational Background.
- 5.The national ID's card included workers names, resident addresses and dates of birth.
- 6.It was evident during the documents review, the age of youngest worker is 21 years, one month old (YOB:2002 and YOH: is 2023). During the facility walkthrough, there were no concerns regarding child labour observed.

Evidence examined:

- Employment procedure updated on 01/10/2023, child labour policy updated on 01/10/2023 were reviewed.
- 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:	15
Age of youngest worker found:	21
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:

1.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. These policies were issued on 01/10/2023.

During the time records and payrolls review for the sampled workers in December 2023 (Current), August 2023 (Peak) and June 2023 (Non-Peak). 10 records were checked, no extra working hours were noted or extra working days. No working was noted on Fridays. The organization respects the wages and benefits regulations and rules.

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

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

- a.135% of workers basic wages to workers for their day light hour's overtime work.
- b.170% of workers basic wages to workers for their night hour's overtime work.
- c.200% of workers basic wages to workers for their weekly day off overtime work.
- d.200% of workers basic wages to workers for their holidays overtime work.

4.Workers basic wages were paid based on the local minimum wage standard of 3000 EGP/month, the minimum salary detected was 4000 EGP/ Month; this was evident during the documents and records review.

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

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

Evidence examined:

1.Employment procedure was reviewed.

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

- Payrolls Records.
- Deduction records.
- Attendees records.
- Incentive records.

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: null	Actual Per Day: 8.0 Per Week: 48.0 Per Month: 240.0	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: null	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 0.0	NO
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: 3000.0	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 4000.0	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
Wages Analysis:			
Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	10 Workers payroll / attenadnce were checked for the followings months December 2023 (Current), August 2023 (Peak) and June 2023 (Non-Peak).		
Are there different legal minimum wage grades? If Yes, please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 3000 EGP Per month till end of Dec 2023.		
If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details:		
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	4000 EGP Per month.		
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:	Social security & Income taxes.		
Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Please list all deductions that have been made.	Social security & Income taxes.		
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: All the working hours are recorded in the time records.
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation <input type="checkbox"/> Other – please give details:
Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility is committed with Egyptian local law 12/2003 article #3; there shall be review for wages in annual basis with a raise of 7%. There is a periodic visit from the work office officials to check wages, insurances and files if there is any non-conformity during the visit, there will be fine.
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: All workers are receiving fair salaries, exceeding by far the legal minimum wage in the country and that according to seniority and job positions, minimum salary detected was equal 4000 EGP per month.
How are workers paid:	<input checked="" 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:

- 1.The organization has written policies and procedures which define the ETI requirements and requirements, and address wages and benefits practices, and legal limits of the working hours. These policies were issued on 01/10/2023.
- 2.Management, admin staff, and workers are working one shift but from 08.00 to 16.00 with lunch break from 13:00 to 14:00 and with 1 day off (Friday).
- 3.Finger print used for attendance by all workers.
- 4.All sampled workers take rest 1 day per week and work a 6 days / week based on Egyptians labour law.
- 5.All the workers are hired directly to the facility and there are no agency workers in the facility.
- 6.It was evident during the workers interview and documents review that the overtime is rare and it is voluntarily; information from worker interviews coincides with time and payroll records. The sampled workers stated that they have worked 2 overtime hours per day due to the urgent business needs (Shipments) and peak seasons and it was confirmed during the time records review.
- 7.During this audit the time records and payrolls review for the sampled workers in December 2023 (Current), August 2023 (Peak) and June 2023 (Non-Peak). 10 records were checked
- 8.Overtime is voluntary according to the workers interviews.
- 9.It was evident during the documents and records review and worker interviews that overtime is worked only occasionally and is never excessive.
- 10.Working hours do not exceed 48 hours per week, according to the Labour Law

Evidence examined:

- 1. Employment procedure was reviewed.
- 2. Documents and records review included attended sheet and production records were checked.
- 3. Attended time records for payrolls records were reviewed during the audit.
- 4. Workers interview.

Any other comments:

None.

Working hours' analysis

Systems & Processes

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

Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No (please explain)
Is this allowed by local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Maximum number of days worked without a day off (in sample):	6
Standard/Contracted Hours worked	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No % of workers: null% Frequency:
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Overtime Hours worked	
Actual overtime hours worked in sample (State per day/week/month)	There is no overtime observed as per sample of workers payroll/attendance were checked and workers interview.
Combined hours (standard or contracted + overtime hours = total) over 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is no any Combined hours over 60 hours were found as per sample of workers payroll/attendance were checked and workers interview.
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: Not applicable.
Overtime premium	

<p>Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A - there is no legal requirement to OT premium</p> <p>Please give details: Not applicable.</p>
<p>Is overtime paid at a premium?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>The facility pays overtime premiums as per Egyptian labour law No. 12/2003, Article # 85 which required overtime fee as following: a.135% of workers basic wages to workers for their day light hour's overtime work. b.170% of workers basic wages to workers for their night hour's overtime work. c.200% of workers basic wages to workers for their weekly day off overtime work. d.200% of times regular basic working hour + one day rest for holidays.</p>
<p>If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.</p>	<p><input checked="" type="checkbox"/> No <input type="checkbox"/> Consolidated pay <input type="checkbox"/> Collective Bargaining agreements</p> <p><input type="checkbox"/> Other</p>
<p>Please give details</p>	<p>None.</p>
<p>If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other)</p>	<p><input checked="" type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week is voluntary <input type="checkbox"/> Safeguards are in place to protect worker's health and safety</p> <p><input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify)</p>
<p>Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other</p>	<p>None.</p>
<p>Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

7 - No Discrimination is Practiced
[Summary of Findings]

7: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

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

Evidence examined:

1. Employment procedure was reviewed.
2. Management interview
3. Workers interview.
4. Documents and records were reviewed as follows:
 - o Application form.
 - o Grievance and suggestion box.

Any other comments:

None.

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 90.0%	Female: 10.0%	
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	2		
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	There is no evidence of discrimination observed during the audit, as well as from management review and workers interview.		
Professional Development			
What type of training and development are available for workers?	HSE TRAINING + SOCIAL AWARENESS 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:

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

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

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

- o All workers are hired direct by the company.
- o All workers signed contract with the company.
- o All workers are covered by the social insurance.
- o No migrant workers.
- o All workers are Egyptian.
- o No home workers.
- o No man power agent used.
- o No subcontractor used.
- o No outsourcing for any processes.

Evidence examined:

1. HR Policy and procedure were reviewed.

2. Management interview.

3. Workers interviews.

4. Documents and records were reviewed as following:

- a. Payroll records were reviewed.
- b. Based on the labour contract, all the workers are covered with social insurance
- c. Labour contracts are matching with the legal requirements 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
Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Migrant Workers		
Type of work undertaken by migrant workers:	There is no migrant workers at the facility.	
Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0	
Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is no migrant workers at the facility.	
Is there any observation on this finding?	There is no migrant workers at the facility.	
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Non-employee workers		
Recruitment Fees		
Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Agency Workers (if applicable) (Workers sourced from a local agent who are not directly paid by the site, but paid by the agency. Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)		
Number of agencies used (average):	0	
Please provide the names of agencies if applicable	There is no migrant workers at the facility.	
Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is there a legal contract agreement with all agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is no agency used at the facility.	
Does the site have a system for checking labour standards of agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is no agency used at the facility.	
Contractors (Contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider.)		

Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is no contractors used at the facility.
Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is no contractors used at the facility.

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600325852	
Clause	8 - Regular Employment Is Provided	
Issue Title	525 - Inadequate contracts in place, i.e. missing critical elements such job description, wages (regular and overtime), hours of work (including overtime), notice period etc.	
Subcategory	Terms of Employment/Engagement	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Egyptian Medical insurance law # 111	
ETI code	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.	
Explanation to the non compliance	It was observed during the documentation review; workers interview of 10 workers, and management interview; there is 3 workers out of 10 were not represent social medical insurance form # 111 to complete the employment documents.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	The facility shall ask all workers to complete form 111	

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

8A: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

There are no Sub-contracting /home workers hired by the Factory, as all orders were produced in the factory premises.

Evidence examined:

- Production records.
- Production capacity plan records.
- Attendance records.
- Shipment records

Any other comments:

None.

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.
- Workers interview
- Site Tour
- Management interviews.

Any other comments:

None.

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

10B2: Compliance Requirements

- 10.B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.
- 10.B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.

Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.

Current Systems and Evidence Examined

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

Current Systems:

- The facility is managing the site activities according environmental management system of ISO14001:2015.
- The site established an updated environmental policy 25/12/2022 that covers its environmental impact and is communicated to all suppliers and customers.
- The site measured the impacts and these effects are mentioned in the latest environmental impact report
- The environmental policy includes a site committee to ensure continuous improvements in its environmental performance.
- The site has established and maintained an environmental management system.
- Hazard identification, risk assessment and control was established and updated on 01/01/2024.
- Last waste water analysis was carried out in Nov 2024
- All types of waste are disposed to legally approved waste disposal agents.

Evidence examined:

- Legal approvals.
- Waste management contracts/records.
- Environmental aspects monitoring report.
- Facility tour.

Any other comments:

None.

Attachments

 <p><u>Business Licenses.jpg</u></p>	 <p><u>ETi Print Instruction and policy - wadi elnile.pdf</u></p>
 <p><u>Industrial Commercial Certifiacte.jpg</u></p>	 <p><u>Wadi El Nile BRC Issue 9 A4 Egypt_14-12-22 BRC 0588_01 24_04_2023.pdf</u></p>
 <p><u>WADI EL NILE FOR FOOD INDUSTRIES - HALAL.pdf</u></p>	 <p><u>Tax Card.pdf</u></p>

 <p><u>Industrial Commercial Certificate.jpg</u></p>	 <p><u>Wadi El Nile BRC Issue 9 A4 Egypt_14-12-22 BRC 0588_01_24_04_2023.pdf</u></p>
 <p><u>WADI EL NILE FOR FOOD INDUSTRIES - HALAL.pdf</u></p>	 <p><u>Tax Card.pdf</u></p>
 <p><u>Layout.pdf</u></p>	 <p><u>Ethical Policy.pdf</u></p>
 <p><u>HR Manual.pdf</u></p>	 <p><u>CAPR_ZAA600043954_signed.pdf</u></p>
 <p><u>Training.rar</u></p>	 <p><u>GSCSF75-Photoframe for Social-WADI EL NILE FOR FOOD INDUSTRIES.pdf</u></p>



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

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

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

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

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

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

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d

[Click here for Auditors:](#)

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