



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 1087255	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 1032821	
Business name (Company name):	Shorouk for modern printing & packaging			
Site name:	Shorouk for modern printing and packaging			
Site address: <i>(Please include full address)</i>	1st Industrial zone, Obour city - Cairo	Country:	Egypt	
Site contact and job title:	Sabry Aboud (Compliance Manager)			
Site phone:	01001645628	Site e-mail:	sabood@shorouk.com	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar	<input checked="" type="checkbox"/> Business Ethics
Date of Audit:	20-22 th February 2023			

Audit Company Name & Logo: 	Report Owner (payer): Shorouk for modern printing & packaging
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

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

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

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

Any exceptions to this must be recorded here (e.g. different sample size): The initial number of employees in the application form was 490 which means 2.5 days for 4 pillar audit but the actual number detected at opening meeting was 806 mean 3.5 days for 4 pillar audit. The auditor extended the audit days to 3 days , instead of 2.5MD.

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

Lead auditor: AbdAllah Mohamad	APSCA number: RA21701695
Lead auditor APSCA status:	In Good Standing
Team auditor: Esraa Zekrallah	APSCA number: N/A
Interviewers: AbdAllah Mohamad	APSCA number: RA21701695

Report writer: AbdAllah Mohamad
Report reviewer: Vita Alyason

Date of declaration: 22nd February 2023

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

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

Summary of Findings

Issue (please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.	Area of Non-Conformity (Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)				Record the number of issues by line*:			Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>				Nil
0B Management systems and code implementation		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1	0	1	Summary of Non-Compliance findings: <ul style="list-style-type: none"> new operating plant don't mention at license nor commercial record. Summary of Good Example findings: <p>The Facility is certified</p> <ul style="list-style-type: none"> ISO 14001:2015 valid until 28th December 2023. Certificate# 0069958-00 From Intertek ISO 45001:2018 valid until 11th July 2025. Certificate# 0122794. FSC valid until 11May 2023. Certificate# SGS CH / COC/ 011031 ISO 9001:2015 valid until 18th October 2023. Certificate# 0105613 From Intertek
1. Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	Nil
2. Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	Nil
3. Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	3	0	0	Summary of Non-Compliance findings: <ul style="list-style-type: none"> Accident records not updated Spillage facilities missed at chemical store.

									• some fire extinguishers are blocked
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	Nil
5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	Nil
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	Nil
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	Nil
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	Nil
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	Nil
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	Nil
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	Nil
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	Nil
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	Nil

General observations and summary of the site:

Shorouk for modern printing & packaging company established in 1999 as a private printing, press company and grew over the past 20 years to become one of the largest printing presses in Egypt. The site located at 1st Industrial area, Obour city, Egypt.

Total land area 20800 Sqm building at 12480SqM

The audit was performed over 3 days by 1 auditor and included interviews and records inspection of 42 workers.

All workers were favourable towards the company.

Employees enjoyed the work and stated there is a friendly environment.

Pay is always accurate and is paid on time. Also, employees stated that they felt comfortable in approaching with any concerns they have.

Workers interviewed included both male and female. All workers were favourable towards the company.

Pay is always accurate and is paid on time. Also, employees stated that they felt comfortable in approaching with any concerns they have.

The facility has: 177 fire extinguishers, 91 Co2 extinguishers, 46 fire hose reels, 6 main gates, 11 first aid box, 12 emergency exit doors, 32 fire alarm push button, and CCTV cameras: 105.

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

Site Details

Site Details		
A: Company Name:	Shorouk for modern printing & packaging company	
B: Site name:	Shorouk for modern printing & packaging company	
C: GPS location: (If available)	GPS Address: 1st Industrial area, Obour city, Egypt.	Latitude: 30° 10' 21" Longitude: 31° 28' 15"
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p>Commercial Registration No. 1190, renewed on 31/1/2023</p> <p>Owned contract: 273 issued 16/2/1999 named Tawfeek Yousef Tawfik</p> <p>Licence No. 1321021602011480 issued on 16/2/2021</p> <p>Tax code: 205-050-840 valid till 01/01/2027</p> <p>Industrial-Registration Code No. 1321021601005970 (2001), issued on 28/07/2021 till 26/01/2026</p>	
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	The company prints books, magazines, boxes and folding carton boxes	
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Shorouk for modern printing & packaging company established in 1999 as a private printing press company and grew over the past 20 years to become one of the largest printing presses in Egypt. The site located at 1st Industrial area, Obour city, Egypt.</p> <p>Total land area 20800 Sqm building at 12480 Sqm.</p> <p>The site consists of 9 buildings as follows;</p> <p>The first building has 2 floors; the first floor includes 1 production line with 4 stages (Heidelberg, KBA) and warehouse, 10 Toilets, Lockers, clinic and Canteen. Second floor is 10 admin offices, 3 toilets and meeting room.</p> <p>The second building has 1 floor of warehouses for chemicals. The total land area is 16138SqM.</p> <p>Third building (Obour 3) has 2 floors; the first floor includes 1 production line with 4 stages (KBA) 10 Toilets, Lockers, Mosque and Canteen</p> <p>Second floor is 22 admin offices addition to lab</p> <p>Fourth till Eighth building is Security offices</p> <p>Ninth Building is workshop and Electricity rooms</p> <p>Factory has 806 employees (789 males and 17 females) all of them are Egyptian.</p> <p>No peak seasons.</p> <p>Factory has 806 employees (789 males and 17 females) all of them are Egyptian.</p> <p>No peak seasons.</p> <p>The audit was performed over 3 days by 1 auditor and included interviews and records inspection of 42 workers.</p> <p>The site consists of 9 buildings as following:</p> <p>For below, please add any extra rows if appropriate.</p>	

	Production Building no 1	Description	Remark, if any
	Floor 1	1 production line with 4 stages (Heidelberg, KBA) and warehouse, 10 Toilets, Lockers, clinic and Canteen	N/A
	Floor 2	10 admin offices, 3 toilets and meeting room	N/A
	Is this a shared building?	No	N/A
	Production Building no 2	Description	Remark, if any
	Floor 1	Warehouses for chemicals.	N/A
	Is this a shared building?	No	N/A
	Production Building no 3	Description	Remark, if any
	Floor 1	1 production line with 3 stages (KBA) 10 Toilets, Lockers, Mosque and Canteen	N/A
	Floor 2	10 admin offices, 3 toilets and meeting room	
	Is this a shared building?	No	N/A
	Production Building no 4.5.6.7.8	Description	Remark, if any
	Floor 1	Security Offices	N/A
	Is this a shared building?	No	N/A
	Production Building no 9	Description	Remark, if any
	Floor 1	workshop and Electricity rooms	N/A
	Is this a shared building?	No	N/A
	F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F2: Please give details: No structural integrity issues F3: Does the site have a structural engineer evaluation? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F4: Please give details: the site has a structural engineer evaluation		
	G: Site function:	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer	

	<input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor
H: Month(s) of peak season: (if applicable)	No Peak season
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	Factory has Two production line with Eight Machine lines from Germany (Heidelberg, KBA); including printing, varnish, Die cut and gluing and window patching. The main processes and Products are listed as follows: Printing, varnish, Die cut and gluing. The company prints books, magazines, boxes and folding carton boxes.
J: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input checked="" type="checkbox"/> None
K: Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: If no, please give details

Audit Parameters			
A: Time in and time out	Day 1 Time in: 9:00 Day 1 Time out: 16:00	Day 2 Time in: 8:30 Day 2 Time out: 15:30	Day 3 Time in: 8:00 Day 3 Time out: 15:30
B: Number of auditor days used:	1 auditor x 3 man-day		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define:		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail: weeks		

	<input type="checkbox"/> Unannounced
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause
G: Who signed and agreed CAPR (Name and job title)	Sabry Aboud (Compliance Manager)
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
I: Previous audit date:	14 th May 2022
J: Previous audit type:	Partial Follow-Up
K: Were any previous audits reviewed for this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	N/A (There is no Worker Representatives)		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	N/A (There is no union at this factory).		

Worker Analysis

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

Worker Analysis								
	Local			Migrant*				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	789	0	0	0	0	0	0	789
Worker numbers – female	17	0	0	0	0	0	0	17
Total	806	0	0	0	0	0	0	806
Number of Workers interviewed – male	33	0	0	0	0	0	0	33
Number of Workers interviewed – female	9	0	0	0	0	0	0	9
Total – interviewed sample size	42	0	0	0	0	0	0	42

A: Nationality of Management	Egypt
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<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first. <i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities: B1: Nationality 1: Egypt B2: Nationality 2: _____ B3: Nationality 3: _____</p>	<p>Was the list completed during peak season? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If no, please describe how this may vary during peak periods: N/A no peak season</p>
<p>C: Please provide more information for the three most common nationalities.</p>	<p>C: approx 100 % total workforce: Nationality 1 Egypt C1: approx % total workforce: Nationality 2 _____ C2: approx % total workforce: Nationality 3 _____</p>	
<p>D: Worker remuneration (management information)</p>	<p>D: _____% workers on piece rate D1: _____% hourly paid workers D2: 100 % salaried workers Payment cycle: D3: _____% daily paid D4: _____% weekly paid D5: 100 % monthly paid D6: _____% other D7: If other, please give details</p>	

Worker Interview Summary		
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
C: Number of group interviews: (Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)	6 group of 5	
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 7	D2: Female: 5
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details	
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent	
H: What was the most common worker complaint?	Low salaries, no free meals at night shift	
I: What did the workers like the most about working at this site?	Management treatment	
J: Any additional comment(s) regarding interviews:	Effective communication with the management	
K: Attitude of workers to hours worked:	Workers satisfied about work Environment	
L. Is there any worker survey information available?		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details: N/A		
M: Attitude of workers: (Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk		

42 workers were selected for interviews including 33 male employees and 9 female employees, they were interviewed as 6 groups of 5 and 12 employees were interviewed individually. The workers were assured of confidentiality, and they spoke freely of their views of the factory. All workers said they were satisfied with their employment at the factory and that they felt free to leave this employer and understood the notice period required. They had good relationships with their supervisors and managers who treated them with respect. They were able to make suggestions to their supervisors and team leaders and sometimes they had seen these suggestions used. They felt able to complain directly to their supervisors but also felt free to give their general concerns

N: Attitude of worker's committee/union reps:
(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk

N/A

O: Attitude of managers:
(Include attitude to audit, and audit process. Both positive and negative information should be included)

The factory management had a system in place to check their current practices against their clients' requirements and the local law, and they took notice of the findings of the internal audit team and had recently implemented a Health & Safety committee to take care of health and safety concerns. Managers responsible for implementing legal and code standards included the HR Manager – Mr Helal Abdou and the HSE Manager – Mr Medhat Naguib, whilst the compliance Manager – Mr. Sabry Aboud oversaw the independent and internal audits. The managers were open with the auditor and mentioned they didn't face challenges with employees.

Audit Results by Clause

0A: Universal Rights covering UNGP

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

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

The company Shorouk for modern printing & packaging company published a human rights statement on their intranet. The company nominated designated person responsible Mr. Sabry Aboud for implementing standards. Factory conducted induction training last one on 7th January 2023 to all employees related ETI procedures E.g. forced labour, child labour, discrimination, harassment & abuse, ...

The company identified their stakeholders with all issues with interested parties and their needs and expectations (they already all ISO requirements and combined with social parts).

The terms and conditions for employees are stated in internal policy.

factory has complaint box and grievance forms which are confidential

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

Details:

Policies and employee's handbook were reviewed.

Social policies are included in employee's handbook.

Any other comments: Nil

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

☒ Yes
☐ No

	A1: Please give details: Company implemented ETI Base Code. In addition, company have their own human rights policies which reviewed during the audit.
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Helal Abdou Job title: HR Manager
C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: factory has complaint box and grievance forms which are confidential. Employees can file their concerns through these forms.
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: all data related to workers is located at HR offices. Workers' information is not release without permission from the top management.

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

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

Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 2021 18 %	A2: This year: 2022 %15
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	5 %	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 2021 2.7 %	C2: This year: 2022 2 %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	2 %	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: there was 1 accident in 2021-2022 dated 21 st June 2021.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: 2021 Number: 0	F2: Last year: 2022 Number: 2
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	0	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 0	H2: This year: 0
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 0 % workers	I2: 12 months 0 % workers

J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months 0 % workers	J2: 12 months 0 % workers
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0B: Management system and Code Implementation

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

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

Current Systems and Evidence Examined

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

Current systems:

Responsibility for meeting the legal and client code requirements is on compliance manger Mr. Sabry Aboud, he is responsible to ensure that the standards are met.
Ensuring that licenses and business permissions are up to date is under responsibility of the HR department.
Overall responsibility for meeting the standards is taken by the Compliance manger Mr. Sabry Aboud.
There is an internal audit team for quality who in addition take on the role for internal audit of the social standards of the factory and they report to compliance manager jointly to report their findings.
Policies are communicated to workers via posters and annual training; last one conducted on January 2023.
ETI Base Code is communicated to their own suppliers through mails and contracts condition
There are some certifications at the site, such as ISO 9001, ISO 14001, ISO 45001, FSC etc.

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

Details:

Internal audit documents (the compliance manager update SAQ; dated 2nd January 2023).
Management interviews.
employees' interviews

Any other comments: Nil

Management Systems:

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

☐ Yes

☒ No

A1: Please give details: Auditor enquired with the local labour bureau, and they confirmed there were no fines / prosecutions.

<p>B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>B1: Please give details: Policies exist for the following areas; Forced labour, Health and Safety, Living Wage, Working Hours, No harsh treatment, Environment and Business Ethics.</p>
<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>Policies are communicated to workers via posters and annual training; last one conducted in January 2023.</p> <p>Through documents review and workers interview, workers stated no forced labour, no child labour was found (through interview and document checks).</p>
<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D1: Please give details: training was conducted on 7th January 2023</p>
<p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>E1: Please give details: training records for managers and workers were reviewed. Training for the following issues were conducted; forced labour, child labour, discrimination, harassment & abuse upon their recruitment.</p>
<p>F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>F1: Please give details: ISO 14001:2015 valid until 28th December 2023. Certificate# 0069958-00 From Intertek ISO 45001:2018 valid until 11th July 2025. Certificate# 0122794. FSC valid until 11May 2023. Certificate# SGS CH / COC/ 011031 ISO 9001:2015 valid until 18th October 2023. Certificate# 0105613 From Intertek</p>
<p>G: Is there a Human Resources manager/department? If Yes, please detail.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>G1: Please give details: Mr. Helal Abdou/ HR Manager</p>
<p>H: 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>H1: Please give details: Eng. Sabry Aboud (Compliance Manager)</p>
<p>I: Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>I1: Please give details: Factory established a written policy to ensure all worker information is confidential.</p>

J: Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: factory has a written procedure (HR Procedure) in their social manual which states that confidential information cannot be released without permission.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Internal audit and management review conducted 2 nd January 2023
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: Internal audit and management review conducted 2 nd January 2023 and Corrective actions were implemented
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: The site sends a copy of the ETI code and any relevant customer codes to its own suppliers.
Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: factory provided licence agreement in original form issued in April 1999, under the name; Shorouk for modern printing & packaging company, Ibrahim Tawfik who owned the land.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: legal due diligence is conducted by company's legal staff.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No P1: If yes, how does the company obtain FPIC: N/A
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: Licence No. 1321021602011480 issued on 16/2/2021. The statement reviewed during the audit, factory has an agreement between government and Owner joint-stock company CEO Ahmad Allam.

R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No R1: Please give details: this kind of procedure is not conducted.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details: No evidence of illegal appropriation of land

Non-compliance: 1

1. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against customer code: It was evident during document review that new operating plant (Obour 3 part 18) don't mention at license nor commercial record Local law: Article: 204 In choosing the sites of work, establishments and their branches, and in granting their relevant licenses, the environment protection exigencies shall be observed according to the provisions of legislations issued in this respect. Recommended corrective action: Facility should match with local law and provide all legal document relates all scope	Objective evidence observed: Document review (pls. refer to photo# 22)
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Observation:

Description of observation: None apparent	Objective evidence observed: None
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Good Examples observed:

Description of Good Example (GE): The Facility is certified ISO 14001:2015 valid until 28th December 2023. Certificate# 0069958-00 From Intertek ISO 45001:2018 valid until 11th July 2025. Certificate# 0122794. FSC valid until 11May 2023. Certificate# SGS CH / COC/ 011031 ISO 9001:2015 valid until 18th October 2023. Certificate# 0105613 From Intertek	Objective evidence observed: Document Review
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1: Freely Chosen Employment

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

ETI

1.1 There is no forced, bonded or involuntary prison labour.

1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

Current Systems and Evidence Examined

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

Current systems:

A policy which prohibits forced labour was available for review.

A non-formalised application states that workers must present their ID's for proof of age but that only copies must be kept in the personnel files and the original given back to the workers.

The employee handbook – given to new joiner's states that: Workers can leave with 3 days' notice with no penalty when in probation period but once permanent (this is out of probation) they must give one month written notice.

Employees will be given their full wages on their last day of work

Workers are free to leave the workplace outside of their working hours.

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

Details:

- Personnel files (42 files checked as sample)
- Factory rules
- Management and worker interview

A: Is there any evidence of retention of original documents, e.g. passports/ID's	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, please give details and category of workers affected: N/A
B: Is there any evidence of a loan scheme in operation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please give details and category of worker affected: N/A
C: Is there any evidence of retention of wages /deposits	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of worker affected: N/A
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding: N/A
E: If any part of the business is UK based or registered there & has a	<input type="checkbox"/> Yes <input type="checkbox"/> No

turnover over £36m, is there a published a 'modern day slavery statement?	<input checked="" type="checkbox"/> Not applicable E1: Please describe finding: N/A
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding: N/A
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected: : ETI Base Code is sent to suppliers via emails.
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: all workers are trained with regards to the ETI Base Code, which includes topics related to reducing the risk of forced / trafficked labour.

Non-compliance:

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

Description of observation: None apparent	Objective evidence observed: None
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Good Examples observed:

Description of Good Example (GE): None apparent	Objective evidence observed: None
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2: Freedom of Association and Right to Collective Bargaining are Respected

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

During the opening meeting, it was noted that there is no union or worker committee at the site, but workers have the right to join a union if they wish.

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

Details:

Site policy on freedom of association
Interviews with workers

Any other comments: Nil

A: What form of worker representation/union is there on site?	<input type="checkbox"/> Union (name) <input type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input checked="" type="checkbox"/> None
B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: 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 D1: Please give details: employees can reach the CEO (top management) directly to give their complaints and the CEO solve it. In addition, the company has a grievance Procedure at this factory which explain how to use grievance box and how to investigate complaints.

	D2: Is there evidence of free elections? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
E: 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 E1: Please give details: there is no committee.	
F: Name of union and union representative, if applicable:	N/A	F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Factory has complaint box and grievance forms which are confidential. Employees can file their concerns through these forms.	G1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	there is no committee.
I: Were worker representatives freely elected?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	I1: Date of last election: there is no committee.
J: Do workers know what topics can be raised with their representatives?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please state how many: N/A	
L: Please describe any evidence that union/worker's committee is effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i>	N/A- there is no committee.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If Yes , what percentage by trade Union/worker representation	M1: _0_% workers covered by Union CBA	M2: _0_% workers covered by worker rep CBA
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

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

Observation:	
Description of observation: None apparent	Objective evidence observed: None
Good Examples observed:	
Description of Good Example (GE): None apparent	Objective evidence observed: None

3: Working Conditions are Safe and Hygienic

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

1. General Health and Safety; last Training dated 6/2/2023
 - Mr Medhat Naguib is Health & Safety Manager for the site
 - Potable water was freely available in all areas and test certificates conducted on 2/2/2023 from Techno lab company.
 - Sufficient clean toilets segregated by gender were available always to workers.
 - Ventilation, temperature and lighting were adequate for the production processes
 - Health certificates for kitchen operators and hygiene certificate for the kitchen were up-to-date and legal (E.g., Ehab Lotfy valid till 20th December 2023).
 - Minutes of meetings show monthly meetings between the H&S committee (workers) and the H&S manager, and each point is acted on 29th January 2023.
 - Risk assessment reviewed on 15th February 2023 by Medhat Mohamad Naguib.
- risk assessment related to COVID-19 available with a lot of instruction posted at everywhere they applied instructions strictly.
- Forklift inspections conducted; last inspection report dated 13/2/2023.
- Noise level inspections considered at environmental measures which done by E2RC dated 19/9/2022
- Health inspections for the employees done by governmental organisation dated 9/2022.
2. Fire Safety
 - There were at least 4 exits from each work area, and these were clearly marked.
 - Fire-fighting equipment was adequate and checks were up to date. Last inspection conducted in February 2023.
 - Evacuation diagrams were posted in all areas and understood by all workers interviewed.
 - Fire drills were organised and recorded Twice a year last Two drills conducted on 19th November 2022 and 1 February 2023.
 - Training had been given by the local fire department and fire marshals selected for extra training. Last training conducted on 1st February 2023.
3. Electrical safety

- All electrical equipment was in good condition such as sockets, plugs, switches and main fuse boards it inspected monthly last inspection done in February 2023

4. Medical services

- There were adequate first aid kits in each production area, and they were well stocked.
- There were 13 first aiders and when a selection was interviewed, they confirmed they had been trained by DR. Hamdy. Last training conducted on 22nd December 2022.

5. Chemical safety

- All chemicals were correctly labelled.
- Material Safety Data Sheets were available and there were hazard diagrams on any chemicals which needed careful handling but no spillage facilities nor procedure at chemical store

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

Details:

- Health and safety policy
- Health and safety manual
- Training records and certificates
- Fire drill records
- Trained first aider register
- Accident reports
- Chemical list and MSDS for each chemical

Any other comments: Nil

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: company has internal procedure. Last H&S training conducted on 6/2/2023. covered all employees.
B: Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: the policies are included in Worker's manual
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: The site has a valid building safety certificate. Structural additions were made.
D: Are visitors to the site informed on H&S and provided with personal protective equipment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: visitors are informed on H&S issues. Company has instructions at their system. All the employees are provided with PPE's.
E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: the factory has medical room; they have nurse (Yasser Ezzat).

F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: factory has 13 first aiders. They are trained. Last training conducted on 22 nd December 2022.
G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: company rents cars for transportation. The safety of the cars is on the rental company who provides all legal licences regarding safety.
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H1: Please give details: N/A. no living space at the factory
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: risk assessment was reviewed. Last risk assessment conducted on 15 th February 2023 by Medhat Naguib.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: matching with local law (license and industrial record reviewed) e.g. ISO 14001:2015
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: the site has a copy of the banned substances list from its customer and is meeting those requirements.

Non-compliance: 3

1. Description of non-compliance:

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

It was evident during site tour 3 fire extinguishers and One hose reel are blocked at Production Hall (Obour 3)

Local law; Article: 214 The establishment and its branches shall take the necessary precautions and conditions for protection from fire risks as determined by the concerned quarter at the Ministry of Interior, and according to the nature of the activity exercised by the establishment, and the physiochemical properties of the materials used and produced, subject to the following:

(A) All fire-fighting and extinguishing equipment and tools being used shall conform to the Egyptian standard specifications.

(B) Developing the fire-fighting and protection equipment by using the latest methods, and providing alarm, early Warning, cautioning, protective, insulation, and, automatic fire. Extinguishing equipment whenever necessary, according to the nature of the establishment and its activity.

Recommended corrective action: It is recommended that the H&S Manager ensures all firefighting facilities are accessible and effective

Objective evidence

observed: 1. Site Tour (pls. refer to photos# 19 &23)

2. Description of non-compliance:

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

It was evident during interviews and document review that accident happened 6th February but it not recorded

ETI requirement: 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.

Recommended corrective action: It is recommended that accident record shall be updated and record all accidents

Objective evidence

observed: 2. interviews and document review (pls. refer to photo# 20)

3. Description of non-compliance:

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

It was evident during site tour that no spillage facilities nor procedure at chemical store

Local law: Article: 211 The establishment and its branches shall provide means of protection from chemical dangers resulting from dealing with solid, liquid, and gaseous chemical substances, subject to the following:

(A) The highest concentration permissible in the chemical materials and the cancer-causing materials to which the workers are exposed shall not be exceeded.

(B) The dangerous chemical materials stock shall not exceed the threshold quantities for each of them.

(C) Providing the necessary precautions for protection of the establishment and workers on transporting, storing, handling and using the dangerous chemical materials and disposing of their wastes.

(D) Keeping a register for limiting the dangerous chemical materials being handled, comprising all data concerning each material, and a register for recording the status of work environment and exposure of the workers to the danger of chemicals.

(E) Placing labels for recognizing all chemical materials handled at work, and indicating their scientific and trade name, their chemical composition, their degree of dangerousness, the safety precautions, and the relevant emergency procedures. The establishment shall obtain the data mentioned in these materials from the suppliers upon supplying them.

Recommended corrective action: It is shall H&S Manager ensures that chemical store at safe conditions

Objective evidence

observed: 3. Site Tour (pls. refer to photo# 21)

Observation:

Description of observation:

None apparent

Objective evidence

observed: None

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

4: Child Labour Shall Not Be Used

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

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

ETI

4.1 There shall be no new recruitment of child labour.

4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

Current Systems and Evidence Examined

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

Current systems:

An informal procedure to check age of workers at application stage, includes checking ID's.
After joining original ID's are returned and only copies kept on file.
Youngest worker is 19 yrs.

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

Details:

- Personnel files of all workers
- Latest list of employees.

Any other comments: Nil

A: Legal age of employment:	18
B: Age of youngest worker found:	19
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0 %
E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details

Non-compliance:

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

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

5: Living Wages are Paid

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

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

ETI

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

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

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

Current Systems and Evidence Examined

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

Current systems:

The local legal minimum wage was 2700 L.E /month according to the Egyptian law# 103:2022.

All workers' wages were calculated on hourly and monthly basis. The minimum wage paid by the factory was 2750 L.E per month according to the wage records review.

The wages office was well organised with a good, controlled set of processes which are understood by all employees.

All workers are provided with written and understandable information about their employment conditions in respect to wages before they enter employment. Also, employees receive explanation about their wages for the pay period concerned each time that they are paid.

Document review of payroll and employee wage records showed that all workers had all social insurance deducted according to the law requirements.

Auditor selected 126 wages record for the following months; January 2023(current month), November 2022 (Random) and July 2022 (Random)

Benefits, annual leave, was given to all workers.

All social insurance payments were passed on to the relevant authorities in a timely manner.

All workers were paid on 30th of each month by cash.

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

Details:

Worker interview

Local and national laws

Payroll record were reviewed; January 2023(current month), November 2022 (Random) and July 2022 (Random)

Leave records

Social insurance and payment receipts from the local labour department

Labour contracts for all employees (to examine agreed wage rates)

Any other comments: Nil

Non-compliance:

1. Description of non-compliance:

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

Local law and/or ETI requirement:

Recommended corrective action:

Objective evidence observed: None

Observation:

Description of observation:

None apparent

Objective evidence observed: None

Good Examples observed:

Description of Good Example (GE):

None apparent

Objective Evidence Observed: None

Summary Information

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: 48 Hours/ week	A1: 48 Hours/ week	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 12 Hours / week	B1: 8 Hours / week	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 2700 L.E/ Monthly	C1: 2750 LE/ Monthly	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 1.35% at day work, 1.70% at night work	D1: 1.35% at day work, 1.70% at night work	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Wages analysis:

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

A: Were accurate records shown at the first request?

☒ Yes
☐ No

A1: If **No**, why not?

N/A

B: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	42 samples from January 2023 (most recent) 42 samples from November 2022 42 samples from July 2022		
C: Are there different legal minimum wage grades? If Yes , please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	C1: If Yes , please give details: N/A	
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	D1: If No , please give details: N/A	
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> Lowest person had basic salary of 2750 L.E /month	
F: Please indicate the breakdown of workforce per earnings:	F1: ____% of workforce earning under minimum wage F2: 0 % of workforce earning minimum wage F3: <u>100</u> % of workforce earning above minimum wage		
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i> Full time employees have annual bonus		
H: What deductions are required by law e.g. social insurance? Please state all types:	Social insurance, Absence, taxes		
I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that have been made. I2: Please list all deductions that have not been made.	1. Social insurance 2. Taxes 3. Absence Please describe: all social benefits are deducted according to the law requirements. 1. N/A Please describe:
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	K1: Type <input type="checkbox"/> Poor record keeping	

	<input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: pay slips of all employees were found very detailed and reflect all hours worked including OT hours, absenteeism etc.
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time: N/A
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details:
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: company conducts an annual review on the wages, to give increases.
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: factory rules review, payroll records review and employee's interviews confirmed that equal rates are being paid for equal work.
Q: How are workers paid:	<input checked="" type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain:

6: Working Hours are not Excessive

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

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

ETI

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

Through employees' interview, overtime is voluntary.

The factory provided hours and wages records from January 2023 (current month), November 2022 (Random) and July 2022 (Random) .

Timecards are filled in electronic by the employees and then entered to an electronic payroll system which calculates wages.

According to time records and worker interview basic working hours were 12 hours per day including overtime (2 Hour daily) and breaks (2 Hours).

Employees work from Saturday to Thursday which matching with the law requirements.

employees work max 48 regular hours/ week in two shifts; (8:00-20:00 – 8:00), including overtime (2 Hour daily) and breaks (2 Hours).

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

Details:

Employee interviews
local and national laws
Factory policy on working hours
Computerised time logging system
Workers' contracts
Quality and production records to cross check hours

Any other comments: Nil

Non-compliance:

1. Description of non-compliance:

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

Local law and/or ETI requirement:

Recommended corrective action:

Objective evidence observed: None

Observation:

Description of observation:

None apparent

Objective evidence observed: None

Good Examples observed:

Description of Good Example (GE):

None apparent

Objective Evidence Observed: None

Working hours' analysis

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

Systems & Processes

A. What timekeeping systems are used: time card etc.

Describe: timecards (electronic system)

B: Is sample size same as in wages section?

☒ Yes
☐ No
B1: If no, please give details

C: Are standard/contracted working hours defined in all contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:			
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D1: If YES, please complete as appropriate:			
		<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other
		If "Other", Please define:			
		N/A			
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E1: If yes , please detail hours, %, types of workers affected and frequency Please give details:			
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
		Maximum number of days worked without a day off (in sample):			
		6 days			
Standard/Contracted Hours worked					
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency:			
		N/A			
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details:			
		N/A			
Overtime Hours worked					
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 10 Hours/ week in January 2023 (current month), November 2022 (Random) and July 2022 (Random) (maximum allowed OT hours/ week are; 12				

J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 58 Hours/week
K: Approximate percentage of total workers on highest overtime hours:	65 %
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Per employee's interviews, OT hours are voluntary. Also, per worker's handbook all OT hours are not a compulsory.
Overtime Premiums	
M: Are the correct legal overtime premiums paid?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A – there is no legal requirement to OT premium M1: Please give details of normal day overtime premium as a % of standard wages: 2 OT hours daily (1.35% at day shift and 1.7% at night shift)
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: If yes, please describe % of workers & frequency: 2 OT hours daily (1.35% at day shift and 1.7% at night shift) for 65% workers
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other N/A
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify) P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other: N/A

<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Q1: If yes, please give details: through time records and interviews with workers</p>
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

7: No Discrimination is Practiced

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

Workers are not required to do the examination of the hepatitis B virus and HIV.
Anti-discrimination procedure on hiring, compensation, promotion and access to training was available during the audit .
Both Muslim and Christian workers were distributed in all types of work.
There was no evidence of sexual harassment.

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

Details:

- The hiring and termination procedure,
- Leave application records and employee handbook.
- Payrolls
- Attendance records
- Training records

Any other comments: Nil

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: 95 % A2: Female 5 %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	#: 17 women (e.g Planning Specialist, Marketing, Graphic designer)
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found C1: Please give details: N/A

Professional Development

A: What type of training and development are available for workers?

Health& Safety Training, social training, and technical training

B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?

☒ Yes

☐ No

If no, please give details: N/A

Non-compliance:

1. Description of non-compliance:

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

Local law and/or ETI requirement:

Recommended corrective action:

Objective evidence observed: None

Observation:

Description of observation:

None apparent

Objective evidence observed: None

Good Examples observed:

Description of Good Example (GE):

None apparent

Objective Evidence Observed: None

8: Regular Employment Is Provided

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

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ETI

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current systems:

All permanent workers were recruited by the factory directly.

All of them are Egyptians and no migrant workers

Management and worker interviews stated there are no temporary workers

Permanent workers had received a signed labour contract,

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

Details:

Personal files

Payroll records were provided for review.

Contracts

Interviews

Non-compliance:

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

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

Responsible Recruitment

All Workers	
A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	<input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions A1: If any are unchecked, please describe finding and specific category(ies) of workers affected: Nil
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please describe details and specific category(ies) of workers affected: N/A

C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – C1: If other, please give details:
D: If any checked, give details:	N/A

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

NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A
B: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other B1 – If other, please give details:
C: If any checked, give details:	N/A

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.)	
A: Number of agencies used (average):	A1: Names if available: N/A
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please give details:
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: N/A

Contractors:	
<p>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</p>	
A: Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, how many contractors are present, please give details: N/A
B: If Yes , how many workers supplied by contractors?	N/A
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please describe finding:
D: If Yes , please give evidence for contractor workers being paid per law:	N/A

8A: Sub-Contracting and Homeworking

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

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

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

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

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems: Factory doesn't have subcontractors or home workers

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate): Factory doesn't have subcontractors or home workers

If any processes are sub-contracted – please populate below boxes

Process Subcontracted	N/A
Name of factory	N/A
Address	N/A

Details: Nil

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against Local Law

☐ NC against customer code:

Local law and/or ETI /Additional Elements requirement:

Recommended corrective action:

Objective evidence observed: None

Observation:

Description of observation:

None apparent

Objective evidence observed: None

Good Examples observed:

Description of Good Example (GE): None apparent	Objective Evidence Observed: None
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Summary of sub-contracting – if applicable	
<input checked="" type="checkbox"/> Not Applicable please x	
A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: Please describe: N/A
B: If sub-contractors are used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No B1: If Yes , summarise details: N/A
C: Number of sub-contractors/agents used:	N/A
D: Is there a site policy on sub-contracting?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: If Yes , summarise details:
E: What checks are in place to ensure no child labour is being used and work is safe?	N/A

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

<p>G: Do any contracts exist for homeworkers?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>G1: Please give details:</p>
<p>H: Are full records of homeworkers available at the site?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No N/A</p>

9: No Harsh or Inhumane Treatment is Allowed

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

ETI

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

Additional elements:

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 rd party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: factory has a good mechanism which includes; confidential forms and compliant box for collecting complaints or suggestion to improve social environment.
B: If Yes , are workers aware of these channels and have access? Please give details.	Employees are aware of these channels and factory conducted a training to all employees. Last training conducted in February 2023.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Confidential complaint box
D: Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Workers <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input type="checkbox"/> Other D1: Please give details: forms and compliant box for collecting complaints or suggestion to improve social environment. Factory has separate procedures for suppliers to raise complaints and grievances (they added conditions at contract and arrange meeting with them).
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: If no, please give details
G: Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain
H: If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: If no, please give details

I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?

☐ Yes
☒ No

II: If yes, please give details N/A

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:

From reviewing management system documents, it was noted that a disciplinary procedure was established for workers' misbehaviour which included oral warning, written warning and finally termination and the site. Also, factory developed a training program for all employees on the procedure. They have Two Boxes these boxes opened every Thursday and investigate every complaint found through committee from management to solve Worker interview confirmed that workers were aware of the disciplinary procedure.

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

Details:

The relevant policy on prevention of harassment and abuse
Training records

Any other comments: Nil

Non-compliance:

1. Description of non-compliance:

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

Local law and/or ETI requirement:

Recommended corrective action:

Objective evidence observed: None

Observation:

Description of observation:

None apparent

Objective evidence observed: None

Good Examples observed:

Description of Good Example (GE):

None apparent

Objective Evidence Observed: None

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

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

Additional Elements

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

10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

Current Systems and Evidence Examined

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

Current systems:

During the audit, personal files were reviewed with copy of ID's.

All workers had the proper legal rights to work in this region. The youngest age was 19 years old.

All employees were recruited directly by the company.

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

Details:

Hiring procedure

Personnel files

Worker handbook

Any other comments: Nil

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against Local Law

☐ NC against customer code:

None apparent

Local law and/or ETI /Additional Elements requirement:

Recommended corrective action:

Objective evidence observed: None

Observation:

Description of observation:

None apparent

Objective evidence observed: None

Good examples observed:

Description of Good Example (GE):

Objective Evidence Observed: None

None apparent	
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10. Other issue areas 10B4: Environment 4–Pillar

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

To be completed for a 4–Pillar SMETA Audit and remove the previous page which is 10B2 environment 2 pillar

B.4. Compliance Requirements

10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.

10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.

10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements

10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.

10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.

10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4–pillar audit report and audit checks for details).

10B4.7 Businesses shall make continuous improvements in their environmental performance.

10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation

10B4.9 Businesses should have a nominated individual responsible for co–ordinating the site's efforts to improve environmental performance.

B4. Guidance for Observations

10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.

10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.

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

Current Systems and Evidence Examined

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

Current systems:

The factory management maintained all legally required environmental documents in place which proved that the production of the factory was in compliance with the related environmental regulations. The factory management designated Mr Medhat Naguib as responsible person for implementing environmental issue.

All the legally required certificates including the registration form of environmental impacts of the construction, Approval of environmental impact assessment document and the environmental protection check, and acceptance were available and valid during this audit.

Factory is certified for ISO 14001:2015 so they have environmental policy reviewed on and targets for reducing energy and water.

Environmental Measures dated 19th September 2022 by E2RC

Waste contract with First (specified Company) dated 18th February 2023, Last Consignment dated 5th February 2023.

Based on worker's interview, they were trained on environmental protection on 17th January 2023.

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

Details:

All legally required environmental documents were provided for review.

Environmental policy

Energy bills

Water bill

Worker and management interview.

Site tour

Any other comments: Nil

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against Local

☐ NC against customer code:

Objective evidence observed: None

Local law and/or ETI/Additional Elements requirement:

Recommended corrective action:

Observation:

Description of observation:

None apparent

Objective evidence observed: None

Good examples observed:

Description of Good Example (GE):

None apparent

Objective Evidence Observed: None

Environmental Analysis <i>(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)</i>	
A: Is there a manager responsible for Environmental issues (Name and Position):	Mr Medhat Naguib (HSE Manager)
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: factory is certified for ISO 14001:2015. Factory conducted simple risk assessment on 15 th February 2023 which refers to waste and environmental measures.
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: ISO 14001:2015 valid until December 2023. Certificate# 0069958-00
D: Does the site have an Environmental policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, is it publicly available? Factory has published policy which is reviewed on 2 nd October 2022
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: already contain key impacts and commitment for improving
F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please give details. <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: N/A
H: Have all legally required permits been shown? Please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: environmental measures certificate which conducted on 19 th September 2022 by E2RC Factory license renewed on 16 th February 2021
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A I1: Please give details: company has a list of chemicals which they use.
J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: matching with Unilever requirements. This is included in the site's internal management system.
K: Facility has reduction targets in place for environmental aspects e.g. water consumption	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: company showed management review 2022 which mention their

and discharge, waste, energy and green-house gas emissions:	reduction targets (Energy reduce – waste generating reduce).
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: facility has a contract with company which take wastes (normal and hazardous) from 18th February 2023, other wastes have another contract with special company for collecting wastes (First).
M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: factory already certified ISO 14001:2015 so they have good system for measuring and monitoring consumption of key utilities of water, energy and natural resources
N: Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: Please give details: no sub-contracting

Usage/Discharge analysis

Criteria	Previous year: Please state period: July 2021- January 2022	Current Year: Please state period: July 2022 – January 2023
Electricity Usage: Kw/hrs	4227112 Kw/hrs	4777372 Kw/hrs
Renewable Energy Usage: Kw/hrs	N/A	N/A
Gas Usage: Kw/hrs	6582 Litre Diesel	8758 Litre Diesel
Has site completed any carbon Footprint Analysis?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If Yes , please state result	N/A	N/A
Water Sources: Please list all sources e.g. lake, river, and local water authority.	<ul style="list-style-type: none"> Local Water authority 	<ul style="list-style-type: none"> Local Water authority
Water Volume Used: (m³)	21015 m³	27455 m³
Water Discharged: Please list all receiving waters/recipients.	<ul style="list-style-type: none"> At drainage system 	<ul style="list-style-type: none"> At drainage system
Water Volume Discharged: (m³)	21015 m³	27455 m³
Water Volume Recycled:	N/A	N/A

(m ³)		
Total waste Produced (please state units)	9542 Ton	1025.5 Ton
Total hazardous waste Produced: (please state units)	620 Kg solid waste 608 empty containers	402 Kg solid waste 366 empty containers
Waste to Recycling: (please state units)	842 Ton	1016 Ton /month
Waste to Landfill: (please state units)	8700 kg	9500 kg
Waste to other: (please give details and state units)	Information was not provided by the factory	Information was not provided by the factory
Total Product Produced (please state units)	9113 Ton	9873 Ton

10C: Business Ethics – 4-Pillar Audit

[\(Click here to return to summary of findings\)](#)
To be completed for a 4-Pillar SMETA Audit

10C. Compliance Requirements

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

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

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

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

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

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

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

10C. Guidance for Observations

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

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

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

Current Systems and Evidence Examined

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

Current systems:

The company manager designated Mr. Sabry Aboud to be the responsible person for implementing standards concerning Business Ethics, and that site practices were conducted without any corruption and/or bribery. Company conducted an induction training for every employee about Ethics policy last session dated 2nd February 2023.

The company established a business ethics policy, however last communication with supplier was conducted in January 2022 (NASYDCO).

The site had received and read the integrity letter of the audit company.

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

Details:

The company business ethics policy includes;

- Bribery

- Corruption
Training records
Any other comments: Nil

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements
☐ NC against customer code:

☐ NC against Local

Objective evidence observed: None

Local law and/or ETI/Additional Elements requirement:

Recommended corrective action:

Observation

Description of observation:

None apparent

Objective evidence observed: None

Good examples observed:

Description of Good Example (GE):

None apparent

Objective Evidence Observed: None

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

☒ Internal Policy
☒ Policy for third parties including suppliers

A1: Please give details: there is a written policy on the need to avoid bribes and fraudulent practices.

B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?

☒ Yes
☐ No

B1: Please give details: Training provided. Last training conducted on 2nd February 2023.

C: Is the policy updated on a regular (as needed) basis?

☒ Yes
☐ No

C1: Please give details: examined each year by HR department and adjusted if needed.

D: Does the site require third parties including suppliers to complete their own business ethics training

☒ Yes
☐ No

D1: Please give details: factory communicate to third parties their own business ethics policies and procedures by email and maintain these communication as hard copies, last communication was conducted on in January 2022.

Other Findings Outside the Scope of the Code

Nil

Community Benefits

(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)

Nil






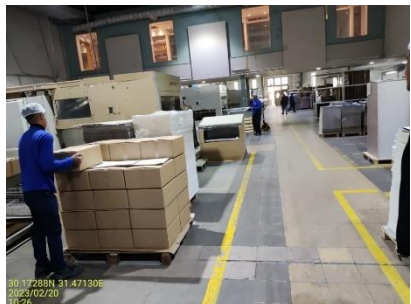
Appendix 1

Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."


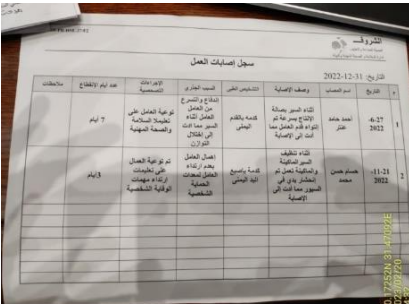



☒ Not Applicable please x

Photo Form

No. 1 -Logo and Entrance	No. 2- Varnish Line	No. 3- Warehouse
No. 4- Dining area	No. 5 -Toilets	No. 6- washing facilities
No. 7- Social Policies	No. 8 - First aid Box	No. 9-Sample of Fire extinguisher
No. 10- Assembly Point	No. 11- Emergency Exit	No. 12- Grievance Box

		
No. 13- New Production Hall	No. 14- Hose reel	No. 15- Lockers
		
No. 16- Entrance	No. 17- Clinic	No. 18- Packing

Photos of Non-Conformities

		
No. 19- NC Blocked Fire equipment	No. 20- NC accident record not updated	No. 21- NC chemical store without spill kit nor spillage procedure
		
No. 22- NC License for old plant only	No. 23- NC Blocked Fire equipment	



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

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

[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

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)

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

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

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