

Sedex Members Ethical Trade Audit Report

Version 7



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Audit content

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Minimum Requirements were applied and the SMETA Auditor Manual was followed. 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.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the following Code Areas:

Included in a 2-Pillar audit:

1. Labour Standards Code Areas:
 - 0: Enabling accurate Assessment
 - 1: Employment is Freely Chosen
 - 1.A: Responsible Recruitment & Entitlement to Work
 - 2: Freedom of Association and Right to Collective Bargaining are Respected
 - 4: Child Labour Shall Not be Used
 - 5: Legal Wages are Paid
 - 5.A: Living Wages are Paid
 - 6: Working Hours are Not Excessive
 - 7: No Discrimination is Practiced
 - 8: Regular Employment is Provided
 - 8.A: Sub-contracting and Homeworkers are Used Responsibly
 - 9: No Harsh or Inhumane Treatment is Allowed
2. Health & Safety Code Area:
 - 3: Working Conditions are Safe and Hygienic
3. Environment Code Area:
 - 10.A: Environment 2-Pillar

Included in a 4-Pillar audit:

1. Labour Standards Code Areas
 - As 2-pillar
2. Health & Safety Code Area
 - As 2-pillar
3. Environment Code Area:
 - 10.A: Environment 2-Pillar
 - 10.B: Environment 4-Pillar
4. Business Ethics Code Area:
 - 10.C: Business Ethics

- (2) Where appropriate, non-compliances or non-conformances were raised where either local law or the Base Code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.
- (3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

Audit and site details

Audit details

Sedex company reference	ZC5000051046	Auditor company name	International Associates Limited
Date of audit	2025-01-11	Audit conducted by	Sedex member
Audit pillars	Labour Standards Health and safety		

Site details

Sedex site reference	ZS1000060174	Site name	London for Export
Business name	London for Export	Site address	88177 Industrial Zone, Sadat City, Menofia Governorate – Egypt, 25 Porsaid Street, Al-Saarania, Kafr El Dawwor, Behira Governorate, Egypt, Menofia, EG
Site phone	01001284043	Site email	tsalahdin2003@yahoo.com

Audit parameters

Time in and out	Day 1	
	In	08:00
	Out	16:00
Audit type	Full initial	
Was the audit announced?	Announced	
Was the Sedex SAQ available for review?	Yes	
Who signed and agreed CAPR?	Mohamed Amr / General Manager	
Any conflicting information SAQ/Pre-Audit Info	No	
Is further information available?	No	

Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	No	No
B: Present at the audit?	Yes	No	No
C: Present at the closing meeting?	Yes	No	No
Reason for absence at the opening meeting	The facility does not have a workers' representative, which is not a legal requirement in Egypt. However, to facilitate communication between workers and management, the facility has implemented alternative mechanisms such as a grievance box and an open-door policy. While these measures support communication, the absence of a dedicated workers' representative may limit formal representation of workers' collective interests in discussions or decision-making processes.		
Reason for absence during the audit	The facility does not have a workers' representative, which is not a legal requirement in Egypt. However, to facilitate communication between workers and management, the facility has implemented alternative mechanisms such as a grievance box and an open-door policy. While these measures support communication, the absence of a dedicated workers' representative may limit formal representation of workers' collective interests in discussions or decision-making processes.		
Reason for absence at the closing meeting	The facility does not have a workers' representative, which is not a legal requirement in Egypt. However, to facilitate communication between workers and management, the facility has implemented alternative mechanisms such as a grievance box and an open-door policy. While these measures support communication, the absence of a dedicated workers' representative may limit formal representation of workers' collective interests in discussions or decision-making processes.		

SMETA declaration

Auditor team

SMETA declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.

1. Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform.
2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question.

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.

Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)

None

Lead auditor

Ahmed Hussain

APSCA Number

21703115

Additional auditor

Date of declaration

2025-01-11

Site representation

Declaration	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
Full name	Mohamed Amr
Title	General Manager
Date of declaration	2025-01-11





































Summary of findings

Code area	Workplace requirement	Local law	Finding
5.A. Living wages are paid	5.A.A Review workers' total pay including ben...		NC ZAF600792729
3. Working conditions are safe and hygienic	3.O Implement an appropriate electrical safet...	§1	NC ZAF600792730
	3.F Have a system in place to measure the eff...		NC ZAF600792731
	3.N Maintain a log of all hazardous substance...	§2	NC ZAF600792732

Local law issues

\$1	Article 215: Employers must take all necessary precautions to protect workers from hazards associated with equipment, machinery, and electricity.
\$2	Ministerial Decree No. 134/2003 (Chemical Safety): Details the precautions for storing and handling chemicals, including ensuring that storage areas are marked, equipped with fire safety measures, and accessible only to authorized personnel.

Management systems

	Policies and procedures	Resources	Communication and training	Monitoring
1. Employment is freely chosen				
1.A. Responsible recruitment and entitlement to work				
2. Freedom of association and right to collective bargaining are respected				
3. Working conditions are safe and hygienic				
4. Child labour shall not be used				
5. Legal wages are paid				
6. Working hours are not excessive				
7. No discrimination is practiced				
8. Regular employment is provided				



Not addressed



Fundamental improvements required







Some improvements recommended



Robust management systems

	Policies and procedures	Resources	Communication and training	Monitoring
8.A. Sub-contracting and homeworkers are used responsibly	✔	✔	✔	✔
9. No harsh or inhumane treatment is allowed	✔	✔	✔	✔
10.A. Environment 2-Pillar	✔	✔	✔	✔

-  Not addressed
-  Fundamental improvements required
-  Some improvements recommended
-  Robust management systems

Site details

Company and site details

Sedex company reference	ZC5000051046	
Sedex site reference	ZS1000060174	
Company name	London for Export	
Business ownership type	GOODS	
Site name	London for Export	
Site name in local language	London for Export	
GPS location	GPS address	Industrial Zone, Sadat City, Menofia Governorate – Egypt,, 25 Porsaid Street, Al-Saarania, Kafr El Dawwor, Behira Governorate, Egypt
	Coordinates	30°26'49.7"N 30°37'53.8"E
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	Mohamed Amr
	Job title	General Manager
	Phone number	01001284043
	Email	tsalahdin2003@yahoo.com
Applicable business and other legally required business license numbers and documents	Commercial Register No. 35531 Printed 16\9\2024. Tax Card No. 753 - 254 – 727 Expiry Date 13/6/2028 Exporters Register: 600009654 issued: 05\01\2022 Valid until:09\11\2026 Operation No: 222019031800019 Release :19\2\2020 Industrial registration: 2020\18000476 Valid Until: 4\2\2025	

Site activities

Site function	Pack house
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Site activities

Site activities	Primary	Growing of other citrus fruits
	Secondary	
	Other	
Product type	Packaging of Citrus, Fruit, and Vegetables	
Process overview	Sorting & Packaging of Oranges, Mandarin, Lemon and Grapefruits, Onions, garlic, carrots and sweet potatoes.	
What level of mechanization best describes the work at this site?	Fair mechanisation / manual Labour	

Site scope

Is the audited site a physically continuous area?	Yes	
What is the area of audited site to its boundary?	11250m ²	
Building 1	Last construction works on site	2020
	If building is shared, provide details	None
	Number of floors	2
	Description of floor activities	The first floor includes the pack house, refrigerators, receiving platform, and shipping platform The second floor includes warehouses and administration.
Is there any difference between the site scope of the audit and the Sedex site profile?	No	
Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?	No	
Is any activity conducted onsite not included within the scope of the audit?	No	

Worker accommodation and transport

Are there any site-provided worker accommodation buildings?	No
Does the site organise worker transport to the worksite?	Not applicable
	None

Work patterns

Approximate workers on site per month (% of peak)	January	90-95%	February	25-50%
	March	25-50%	April	50-75%
	May	50-75%	June	50-75%
	July	90-95%	August	90-95%
	September	90-95%	October	90-95%
	November	90-95%	December	90-95%

Is there any night or back shift work at the site?	No
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Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact?	ISO 45001 (OHS), ISO 14001 (Environmental management), Other certification ISO 9001:2015 CERT NO :SISTEMA\KSA\0222Q0128 Expire date :3\2\2025 ISO 14001:2015 CERT \KSA\0222E0129 Expire date :3\2\2025 ISO 45001:2018 CERT \KSA\0222O0130 Expire date :3\2\2025
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Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community?	Yes The site has been thoroughly assessed to ensure it does not negatively impact the human rights, lands, resources, territories, livelihoods, or food security of indigenous peoples or the local community. Comprehensive evaluations and stakeholder consultations have been conducted, confirming that operations are aligned with the principles of respect, sustainability, and support for local communities and indigenous rights.
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Site assessments

Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?

Yes

Human Rights Impact Assessment (HRIA) has been conducted at this site within the last three years. This assessment thoroughly reviewed and confirmed the site's adherence to human rights standards, identifying any potential risks and implementing measures to ensure ongoing respect and support for human rights in all operations.

Worker analysis

Gender disaggregated data available

Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	28 (28.6%)	70 (71.4%)	- -	98 (100%)

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	18 (18.4%)	40 (40.8%)	- -	58 (59.2%)
Temporary or fixed term employees	10 (10.2%)	30 (30.6%)	- -	40 (40.8%)
Agency or subcontracted workers	0 (0%)	0 (0%)	- -	0 (0%)
Seasonal workers	0 (0%)	0 (0%)	- -	0 (0%)
Self-employed workers	0 (0%)	0 (0%)	- -	0 (0%)
Informal workers including home workers	0 (0%)	0 (0%)	- -	0 (0%)
Apprentices, trainees or interns	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	0 (0%)	0 (0%)	- -	0 (0%)
International migrant workers	0 (0%)	0 (0%)	- -	0 (0%)
Total migrant workers	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from

None

Workers by age

	Men	Women	Other	Total
18 - 24 years old	10 (10.2%)	30 (30.6%)	- -	40 (40.8%)
15 - 17 years old	0 (0%)	0 (0%)	- -	0 (0%)
Under 15 years old	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

Is the worker analysis data relevant for peak season and current to the audit? Yes

Please list the nationalities of all workers, with the three most common nationalities listed first Egyptian

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Egyptian	29%	71%	-	100%

Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 (0%)	0 (0%)	- -	0 (0%)
Workers paid based on a mix of 'piece work' and hourly rate	0 (0%)	0 (0%)	- -	0 (0%)
Workers paid hourly / daily rate	0 (0%)	0 (0%)	- -	0 (0%)
Salaried workers	28 (28.6%)	70 (71.4%)	- -	98 (100%)

* % of total workforce

Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 (0%)	0 (0%)	- -	0 (0%)
Paid weekly	0 (0%)	0 (0%)	- -	0 (0%)
Paid monthly	28 (28.6%)	70 (71.4%)	- -	98 (100%)
Other	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

If other payment cycle entered, please provide details None

People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	2 (2%)	1 (1%)	- -	3
Supervisors or team leaders	3 (3.1%)	3 (3.1%)	- -	6
Administrative staff	3 (3.1%)	2 (2%)	- -	5

Worker interview summary

Gender disaggregated data available Men and women

Which methods of worker engagement were used? Individual interviews
Group interviews

Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?

Was the interview sample representative of all types of nationality and employment types of workers? Yes

Was the interview sample representative of the gender composition of the workforce? Yes

Number and size of group interviews 1 Group X 5 workers

Did workers understand the purpose of the audit? Yes

Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers? Yes

Was there any indication that workers had been 'coached' in how they should respond to questions? No

What was the general attitude of the workers towards their workplace? Favorable

Attitude of workers

In which areas did workers raise significant concerns or complaints?	Other (provide details) None
What did the workers like the most about working at this site?	Pay
Additional comments	None
Attitude of workers' committee/union representatives	None
Attitude of managers	The management team demonstrated a highly positive and proactive attitude during the audit. They were cooperative, transparent, and fully engaged in the process, showing a clear commitment to upholding ethical practices and continuously improving compliance standards. Their open approach fostered a productive environment, facilitating a thorough and smooth audit process.

Workers interviewed by type

	Total
Permanent workers	4
Temporary or fixed-term employees	6
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	10

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	2	3	-	5

Workers interviewed by group/individual

Workers interviewed individually	2	3	-	5
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Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	0	0	-	0
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	0	0	-	0

Measuring workplace impact

Gender disaggregated data available

Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	2.0%	3.0%	-	5.0%
Last full calendar year (2024)	3.0%	5.0%	-	8.0%
Previous full calendar year (2023)	4.0%	5.0%	-	9.0%

* Number of workers leaving in last 12 months as a % of average total number of workers on site over the year.

Rate of absenteeism (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	2.0%	2.0%	-	4.0%
Last full calendar year (2024)	3.0%	5.0%	-	8.0%
Previous full calendar year (2023)	3.0%	5.0%	-	8.0%

* Number of days lost through job absence in the year, calculated as (the number of employees on 1st day of the year + number employees on the last day of the year) / 2)* number available workdays in the year*100

Are accidents recorded?

Yes

The facility maintains an incident log updated monthly and provided tom local legal authority each 6 months.

Annual number of work related accidents and injuries (per 100 workers)*

	Men	Women	Other	Total

Annual number of work related accidents and injuries (per 100 workers)*

Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

* Calculated as (number of work related accidents and injuries * 100) / number of total workers.

Lost day work cases (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

* Calculated as (number of lost days due to work accidents and work related injuries * 100) / number of total workers.

Percentage of workers that work on average more than 48 standard hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

Percentage of workers that work on average more than 60 standard hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%

Percentage of workers that work on average more than 60 standard hours in a given week

Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current assessment: The facility allowed the auditor to conduct and complete the audit without any obstruction, providing access to all requested documents, interviewees, and the facility (including outbuildings and accommodation). Genuine and authentic records were provided to the auditor. No evidence was found of the facility offering bribes, threats, or any actions to induce dishonesty from the auditor. The facility provided an accurate site description and Sedex site profile as required before or during the audit. The facility maintains a written human rights policy statement that is approved at the most senior level, communicated to all personnel, and relevant personnel are trained accordingly.</p> <p>Evidence examined: 1. Documentation, policies, procedures and Records. 2. Interviews and Observations. 3. Production Records. 4. Grievance Mechanisms: 5. Legal compliance records. 6. Site tour.</p>		

0. Enabling accurate assessment

Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment?	No
Did any workers selected by the auditor decline to be interviewed?	No
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	No

1. Employment is freely chosen

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The organization has demonstrated a robust management system to ensure employment is freely chosen. Relevant policies and procedures are in place and effectively maintained to meet workplace requirements. A qualified manager with sufficient seniority is appointed to oversee the implementation of these procedures. Training and communication programs are conducted for employees, supervisors, and managers to ensure understanding and compliance with the policies. Furthermore, the organization monitors the effectiveness of these procedures to ensure continuous improvement and adherence to workplace requirements. No issues or areas for improvement were identified in this regard during the audit.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

Current system:

The facility has established clear policies to ensure that all employment is freely chosen, with no instances of forced, bonded, or involuntary labor. A review of employment contracts, hiring practices, and worker interviews confirmed that all employees have freely entered into their employment without coercion or pressure. The facility does not retain original documents such as passports or identification papers, and workers are free to resign or leave their positions in accordance with legal notice periods. These practices highlight the facility's commitment to upholding the principle of freely chosen employment and respecting workers' rights.

Evidences examined:

1. Documentation, policies, procedures and Records.
2. Interviews and Observations.
3. Production Records.
4. Grievance Mechanisms:
5. Legal compliance records.
6. Site tour.
7. Work contracts were reviewed for all workers to ensure noticed periods; each worker receives a copy of signed contract by both parties.
8. Personal files were reviewed for workers to review the workers hiring documents (copy of birth certificate, copy of ID cards, copy of signed contract).

1. Employment is freely chosen

Data points

If required under local law, is there a published 'modern slavery' or similar statement?	Not Applicable
Does the site utilise any workers who are prisoners?	No
Does the site use the labour of persons required to work under any government scheme?	No

1.A. Responsible recruitment and entitlement to work

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The organization has implemented a robust management system to ensure responsible recruitment and entitlement to work. Policies and procedures relevant to workplace requirements are well-developed and effectively maintained. A manager with appropriate seniority oversees the implementation of these procedures, ensuring accountability and compliance. Training and communication programs are in place for employees, supervisors, and managers to raise awareness and understanding of the related policies. Additionally, the organization monitors the effectiveness of these procedures to ensure continued compliance and improvement. No gaps or recommendations for improvement were identified during the audit.

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section

Current system:

The facility demonstrates a strong commitment to responsible recruitment practices and ensuring that all workers have the legal entitlement to work. A comprehensive review of recruitment records, employment contracts, and worker documentation confirmed that all employees are legally entitled to work, with proper verification processes in place for identification and work authorization. The facility follows fair recruitment practices, ensuring that no fees are charged to workers, and all recruitment procedures are transparent and compliant with legal requirements. Worker interviews further validated that recruitment was conducted ethically and without any undue costs or coercion. This reflects the facility's dedication to upholding high standards in responsible recruitment and legal employment.

Evidence examined:

1. Documentation, policies, procedures ,and Records.
2. Interviews and Observations.
3. Production Records.
4. Grievance Mechanisms:
5. Legal compliance records.
6. Site tour.
7. Work contracts were reviewed for all workers to ensure noticed periods; each worker receives a copy of signed contract by both parties.
8. Personal files were reviewed for workers to review the workers hiring documents (copy of birth certificate, copy of ID cards, copy of signed contract).

1.A. Responsible recruitment and entitlement to work

Data points

Labour hire

Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes?	Workers are recruited, selected, and hired directly by our company
How do the labour providers recruit and hire workers?	Directly
Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey?	0
Are there any subcontracted workers (including dispatched labour) on site?	No
Were all non-employee (e.g. agency or subcontracted) workers included within the scope of this audit for the purpose of document review and (if onsite on date of audit) interview?	Not Applicable
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Not Applicable

Migrant workers

Do any workers migrate across international borders to work at this site?	No
Percentage of workers that are migrant	0%
Do any workers migrate from other states, provinces or regions within the country to work at this site?	No

Recruitment fees

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process? Not Applicable

Were recruitment fees or costs identified during worker interviews? No

No recruitment fees or costs identified during worker interviews.

2. Freedom of association and right to collective bargaining are respected

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met Grade: Robust Management Systems "The organization has developed and implemented comprehensive policies and procedures to ensure that workplace requirements related to freedom of association and collective bargaining are fully met. These systems are effectively integrated into operations and regularly reviewed for compliance."</p> <p>Appoint a manager with sufficient seniority who is responsible for implementing procedures Grade: Robust Management Systems "A senior manager with adequate authority and expertise has been appointed to oversee and ensure the effective implementation of procedures related to freedom of association and collective bargaining, demonstrating strong management commitment."</p> <p>Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures Grade: Robust Management Systems "The organization has established a robust communication and training system, ensuring that all employees, managers, and supervisors are well-informed and adequately trained on policies and procedures related to freedom of association and collective bargaining."</p> <p>Monitor the effectiveness of procedures to meet policy and Workplace Requirements Grade: Some Improvements Recommended "Although the organization has mechanisms to monitor the effectiveness of procedures, there are opportunities for improvement to enhance their thoroughness and ensure that all aspects of compliance are consistently addressed." This committee will help facilitate communication between facility management and workers.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
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No findings

Systems and evidence examined to validate this code section

Current system:

While there is no formal worker representation or trade union within the facility, the site upholds the principles of freedom of association and ensures that workers have avenues to express their concerns and engage with management. The facility operates an open-door policy and provides grievance mechanisms, such as anonymous suggestion boxes, to enable workers to raise issues without fear of reprisal. Worker interviews confirmed that employees feel empowered to voice their opinions and participate in decision-making processes. This demonstrates the facility's commitment to respecting workers' rights to freedom of association, even in the absence of a formal workers' representative body.

Evidence examined:

1. Documentation, policies, procedures and Records.
2. Interviews and Observations.
3. Grievance Mechanisms:
4. Work contracts were reviewed for all workers to ensure noticed periods; each worker receives a copy of signed contract by both parties.

2. Freedom of association and right to collective bargaining are respected

Data points

Are trade unions allowed by law in the national context?	No
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	Not Applicable
Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	No worker representative bodies
Are the worker representatives freely elected by the workforce as a whole?	Not Applicable
Does union/worker committee membership reflect the gender composition of the workforce?	Not Applicable
Does the membership reflect the nationality composition of the workforce?	Not Applicable
Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years?	No

3. Working conditions are safe and hygienic

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	The organization has implemented robust management systems to ensure safe and hygienic working conditions, particularly in policy development and managerial accountability. However, there are opportunities for improvement in communication and training for employees and in monitoring the effectiveness of procedures to ensure consistent alignment with Workplace Requirements.

Summary of findings

Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3.O Implement an appropriate electrical safet...	§1	NC ZAF600792730
	3.F Have a system in place to measure the eff...		NC ZAF600792731
	3.N Maintain a log of all hazardous substance...	§2	NC ZAF600792732

Systems and evidence examined to validate this code section

Current system:

The general health, safety, and environmental (HSE) conditions at the facility are deemed safe, with effective measures in place to ensure worker well-being. The emergency response plan is up to date, last reviewed on 1/12/2024, and the facility conducted a successful evacuation drill on 1/1/2025 with the participation of all workers, demonstrating preparedness for potential emergencies. The HSE risk assessment was last updated on 1/12/2024, ensuring that hazards are regularly evaluated and mitigated. The facility is equipped with 110 fire extinguishers of various types, all in working condition, with maintenance provided internally. The facility maintains 8 fire hose cabinets.

There are 3 first aid boxes.

4 Fire alarm buttons.

These efforts reflect the facility's commitment to maintaining a safe and compliant work environment.

Evidence examined:

1. Documentation, policies, procedures, and Records including:

- Health & Safety risk assessment.
- Health & Safety Policy.
- Facility licenses and permissions.
- Health & Safety Training records.
- H&S Internal audits.
- Last medical check-up was.
- Accidents and Injuries logs.
- Last check for fire extinguishers
- Electrical safety check report.

2. Interviews and Observations.

3. Production Records.

4. Grievance Mechanisms:

5. Legal compliance records.

6. Site tour.

Findings: non-compliances

ZAF600792730

Non-compliance

Due 2025-03-02

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.O Implement an appropriate electrical safety program to ensure that electrical hazards are reduced and controlled by appropriately qualified personnel.

Time given to resolve

30 days

Issue title

227 - Unmarked/incorrect labels/signage/instructions for electrics

Verification method

Desktop audit

Description

It was observed during the site tour, worker's interviews, and management interviews that there are 3 of 6 electrical panels without warning signs.

Area of non-compliance/non-conformance

Local law
Base code

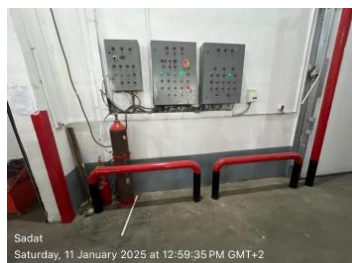
Corrective and preventative actions

Warning sign will be posted.

Local law reference

Article 215: Employers must take all necessary precautions to protect workers from hazards associated with equipment, machinery, and electricity.

Evidence



[Electrical panels without warning signs.jpeg](#)



* PDF generated at 09:18 (UTC) on 31 Jan 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600792731

Non-compliance

Due 2025-04-01

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.F Have a system in place to measure the effectiveness of health and safety training carried out. Ensure training content is understood/implemented by workers.

Issue title

848 - There is no system to measure the effectiveness of health and safety training or there are systemic failures

Description

It was observed during management interviews, worker interviews, and documentation checks that there is no system in place to measure the effectiveness of health and safety training.

Corrective and preventative actions

Training evaluation system will be implemented and documented.

Time given to resolve

60 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Base code

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ZAF600792732

Non-compliance

Due 2025-03-02

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.N Maintain a log of all hazardous substances (e.g. chemicals and pesticides) on site. Ensure that these are managed appropriately at all times in line with safety instructions, including storage, use and disposal.

Issue title

240 - No/inadequate safety measures/anti-explosion measures for chemicals (e.g. no anti-leaking system/secondary container/unbundled)

Description

It was observed during the site tour, worker's interviews, and management interviews that the facility stored chemical drums without secondary containment.

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Base code

Corrective and preventative actions

The secondary containment will be provided.

Local law reference

Ministerial Decree No. 134/2003 (Chemical Safety):
Details the precautions for storing and handling chemicals, including ensuring that storage areas are marked, equipped with fire safety measures, and accessible only to authorized personnel.

Evidence



[Chemicals are stored
without secondary
containment.jpeg](#)



* PDF generated at 09:18 (UTC) on 31 Jan 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, senior manager or business owner
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	Yes Waxing material
Who organises accommodation for workers?	Not applicable
Who organises worker transportation between accommodation and worksite?	Not applicable
Who organises worker transportation while at work?	Other third party contracted by the site
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Yes All structural additions have a valid permit/inspection report as per local law
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No
Does the site have a structural engineer evaluation?	Yes

4. Child labour shall not be used

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>The organization demonstrates a robust management system in the following areas:</p> <p>Policies and Procedures: Relevant policies and procedures are in place and effectively maintained to ensure workplace requirements are met.</p> <p>Managerial Oversight: A manager with sufficient seniority has been appointed to oversee the implementation of these procedures, ensuring accountability and compliance.</p> <p>Communication and Training: Training and communication programs for employees, managers, and supervisors are effectively implemented, contributing to awareness and understanding of workplace policies.</p> <p>Monitoring Effectiveness: The organization monitors the effectiveness of procedures to ensure alignment with policies and workplace requirements.</p> <p>No major gaps were identified in these areas, as all aspects reflect a robust management system.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

Current system:

The facility has implemented strong systems to prevent child labor, in line with local laws and international standards. Employment records and personnel files were reviewed, confirming that the youngest worker at the site is 19 years old. Age verification processes, including ID checks, are consistently applied during the recruitment process to ensure compliance with minimum working age requirements. Worker interviews and management discussions further validated that no underage workers are employed, demonstrating the facility's commitment to eradicating child labor from its operations.

Evidences examined:

1. Documentation, policies, procedures and Records.
2. Interviews and Observations.
3. Production Records.
4. Grievance Mechanisms:
5. Legal compliance records.
6. Site tour.
7. Work contracts were reviewed for all workers to ensure noticed periods; each worker receives a copy of signed contract by both parties.
8. Personal files were reviewed for workers to review the workers hiring documents (copy of birth certificate, copy of ID cards, copy of signed contract).

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	40%
Enter the legal age of employment	16
Enter the age of the youngest worker identified	19
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	Not Applicable

5. Legal wages are paid

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>Grade: Some Improvements Recommended The factory has developed and implemented policies and procedures to ensure compliance with legal wage requirements. These policies cover wage structures, overtime remuneration, and deductions in alignment with Egyptian labor laws. However, there is an opportunity for improvement in the wage payment process. Currently, wages are primarily paid in cash, which may pose security risks and administrative inefficiencies. Transitioning to digital payment methods (e.g., bank transfers, mobile wallets) would enhance security, improve wage traceability, and provide employees with a more reliable payment system.</p> <p>Resources Grade: Robust Management Systems A senior manager with adequate authority is responsible for implementing wage-related policies and ensuring compliance with labor laws. This role includes overseeing the wage payment process, resolving employee concerns, and ensuring adherence to established policies. The management system is well-structured, and responsibilities are clearly defined, ensuring effective wage policy enforcement.</p> <p>Communication & Training Grade: Robust Management Systems The factory provides regular training sessions to employees, supervisors, and managers regarding wage policies and payment procedures. These training programs are well-documented, ensuring workers are informed about their wage entitlements and company policies. To further enhance this process, additional training on digital wage payment methods could be introduced. Educating workers about the benefits of bank transfers and digital payments would facilitate a smoother transition and increase financial literacy.</p> <p>Monitoring & Effectiveness Grade: Robust Management Systems The factory has an effective monitoring system in place to ensure compliance with wage policies and workplace requirements. Regular audits and employee feedback mechanisms help in assessing the effectiveness of wage payments. Moving forward, implementing a digital payroll tracking system could further streamline the process, reducing administrative workload, minimizing errors, and enhancing wage transparency.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current system: The company adheres to all legal requirements concerning wage payments. The statutory minimum wage stipulated by law is EGP 6100 which is already granted by the company as the facility pays a minimum salary of EGP 6000, the company ensures that all employees are compensated fairly. There are no excessive deductions from salaries, and workers are well-informed about the company's wage policies and how their earnings are calculated.</p> <p>Employees are paid regularly in cash, with no portion of their wages being withheld as a deposit. A review of employee contracts and wage records showed full compliance with payment regulations, with no deviations noted. Manual timekeeping records, accurately document working hours and are securely maintained by the facility.</p> <p>A detailed audit of payroll records for 10 employees, covering December, June, and January 2024, confirmed that wage payments were made correctly and in line with legal requirements. Each employee receives a comprehensive monthly pay slip that outlines all legal deductions from their gross wage. These pay slips are signed by the employees and retained in the company's records.</p> <p>During interviews, employees also reported that the company provides free transportation, further enhancing employee satisfaction and support.</p> <p>Evidence examined:</p> <ol style="list-style-type: none"> 1. Documentation, policies, procedures, and Records. 2. Interviews and Observations. 3. Production Records. 4. Grievance Mechanisms: 5. Legal compliance records. 6. Site tour. 7. Work contracts were reviewed for all workers to ensure notice periods; each worker receives a copy of the signed agreement by both parties. 8. Personal files were reviewed for workers to review the workers hiring documents (copy of birth certificate, copy of ID cards, copy of the signed contract). 9. Payment records. 10. Attendance records. 		

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	The legal minimum wage
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Does not use digital payments (give details) Payment done in cash
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	Between 1 and 10%

Worker remuneration

Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers?	Life insurance
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Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Monthly	
Is actual wage data available on site for any of these options?	Monthly	
Maximum legal working hours	Max hours per day	8.0
	Max hours per week	48.0
	Max hours per month	Non applicable
Actual required working hours	Required hours per day	8.0
	Required hours per week	48.0
	Required hours per month	Non applicable
Maximum legal overtime hours	Max hours per day	2.0
	Max hours per week	12.0
	Max hours per month	Non applicable

Actual overtime hours	Max hours per day	0.0
	Max hours per week	0.0
	Max hours per month	Non applicable
Minimum legal wage	Min per hour	Non applicable
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	6000.0
Actual minimum wage	Actual per hour	Non applicable
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	6100.0
Minimum legal overtime wage	Min per hour	33.7
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum overtime wage	Actual per hour	39.0
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	Non applicable

Wage analysis

Number of workers' records checked	10
Provide the date and details of the records	A detailed audit of payroll records for 10 employees, covering December, June, and January 2024
Are there different legal minimum/ legally recognised CBAs wage grades?	No

For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?

Above legal minimum

Indicate the breakdown of workforce per earnings

100% of workers are receiving above legal minimum wage

Are there any bonus schemes used?

No

Were accurate records shown at the first request?

Yes

Were any inconsistencies found?

No

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Local law	Finding
5.A. Living wages are paid	5.A.A Review workers' total pay including ben...		NC ZAF600792729
Systems and evidence examined to validate this code section	<p>Current system: The company currently provides a minimum gross salary of EGP 6100, which is below the EGP 12448 living wage benchmark as defined by the Global Living Wage Coalition (GLWC). Upon conducting interviews with facility management and reviewing salary and HR records, it was determined that the company has not yet implemented a formal plan to align wages with the living wage standard within a defined timeframe. A sample of 10 workers' salary and time records were checked for December, June, and January 2024.</p> <p>Evidence examined:</p> <ol style="list-style-type: none">1. Documentation, policies, procedures and Records.2. Interviews and Observations.3. Production Records.4. Grievance Mechanisms:5. Legal compliance records.6. Site tour.7. Work contracts were reviewed for all workers to ensure notice periods; each worker receives a copy of signed contract by both parties.8. Personal files were reviewed for workers to review the workers hiring documents (copy of birth certificate, copy of ID cards, copy of signed contract).9. Payment records covering November, May, and January 2024.10. Attendance records covering November, May, and January 2024.		

Findings: non-compliances

ZAF600792729

Non-compliance

Code area 5.A Living wages are paid	Status Open*
Workplace requirement 5.A.A Review workers' total pay including benefits and compare it with a credible 'living wage' to calculate a 'living wage gap', and understand what proportion of the workforce has a gap.	Time given to resolve
Issue title 903 - CAR: A living wage gap analysis has not been completed	Verification method Collaborative action required
Description The company currently provides a minimum gross salary of EGP 6,000, below the EGP 12448 living wage benchmark defined by the Global Living Wage Coalition (GLWC). Upon conducting interviews with facility management and reviewing salary and HR records, it was determined that the company has not yet implemented a formal plan to align wages with the living wage standard within a defined timeframe. No living wage gap analysis has not been completed	Area of non-compliance/non-conformance Base code
Corrective and preventative actions A living wage gap analysis will be completed	

* PDF generated at 09:18 (UTC) on 31 Jan 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

6. Working hours are not excessive

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>The organization demonstrates a robust management system to ensure that working hours are not excessive. Key measures include:</p> <p>Policies and Procedures: The company has developed and maintains effective policies and procedures to ensure compliance with workplace requirements regarding working hours.</p> <p>Managerial Oversight: A manager with sufficient seniority oversees the implementation of these procedures, ensuring proper monitoring and accountability.</p> <p>Communication and Training: Relevant training and communication are conducted for employees, managers, and supervisors to raise awareness and ensure adherence to policies on working hours.</p> <p>Monitoring Effectiveness: The organization regularly monitors the effectiveness of its systems to maintain compliance with working hour requirements.</p> <p>Notably, the facility does not require employees to work overtime, ensuring alignment with legal and organizational standards for working hours. This reflects a strong commitment to employee well-being and compliance with labor regulations.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section

Current system:

- 1.The organization has written policies and procedures which define the ETI requirements and requirements, and address wages and benefits practices, and legal limits of the working hours. These policies were last update on 1/1/2024.
- 2.Normal working hours for one shift are from 08:00 to 16:00 and (Friday) is a weekly rest day.
- 3.The facility uses manual attendance records to record workers' attendance.
- 4.All sampled workers take rest 1 day per week and work 6 days / per week based on Egyptian labor law.
- 5.It was evident during the worker's interview and documents review that overtime is rare, and it is voluntary; information from worker interviews coincides with time and payroll records. The sampled workers stated that they have worked zero overtime hours
- 6.During this audit, 10 Time records and payrolls for December 2024 (Last paid month), June 2024 (Random month), and January 2024 (random month).

Evidence examined:

1. Documentation, policies, procedures, and Records.
2. Interviews and Observations.
3. Production Records.
4. Grievance Mechanisms:
5. Legal compliance records.
6. Site tour.
7. Work contracts were reviewed for all workers to ensure notice periods; each worker receives a copy of the signed contract by both parties.
8. Personal files were reviewed for workers to review the workers hiring documents (copy of birth certificate, copy of ID cards, copy of the signed contract).
9. Payment records.
10. Attendance records.

6. Working hours are not excessive

Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	135%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	None
Excluding overtime, what are the regular working hours per week for workers at this site?	48.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	48.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	48.0
Maximum number of days worked without a day off in sample	6

7. No discrimination is practiced

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>The organization has implemented a robust management system to ensure compliance with workplace requirements while maintaining a strong commitment to equal treatment and non-discrimination. Key areas include:</p> <p>Policies and Procedures: Relevant policies and procedures are effectively developed and maintained to ensure workplace requirements are met. These policies explicitly prohibit discrimination of any kind, ensuring that all employees are treated fairly and equitably, regardless of their gender, age, religion, or other characteristics.</p> <p>Managerial Oversight: A manager with sufficient seniority has been appointed to oversee the implementation of workplace policies and procedures. This role includes ensuring that anti-discrimination measures are applied consistently and that equal opportunities are provided to all employees in line with company values and standards.</p> <p>Communication and Training: Training and communication programs are conducted for employees, managers, and supervisors to raise awareness about workplace policies, including anti-discrimination principles. These sessions emphasize the importance of treating all workers fairly and ensuring that no discrimination occurs in any form.</p> <p>Monitoring Effectiveness: The organization consistently monitors the effectiveness of its procedures to meet policy and workplace requirements. This monitoring includes ensuring that policies prohibiting discrimination are upheld and that any concerns are addressed promptly and effectively.</p> <p>Through these measures, the organization not only complies with workplace standards but also fosters an inclusive and respectful work environment where no discrimination is practiced. This reflects the company's commitment to fairness, equity, and continuous improvement.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
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No findings

Systems and evidence examined to validate this code section

Current system:

The facility has established comprehensive policies to prevent discrimination in all aspects of employment, including hiring, promotion, and daily operations. Personnel records, recruitment practices, and promotion criteria were thoroughly examined and found to be fair and consistent, with no evidence of bias based on race, gender, religion, or other protected characteristics. Worker interviews confirmed that all employees feel they are treated equally and fairly. The facility's commitment to non-discrimination is further reinforced through regular training and awareness programs for staff and management, ensuring a respectful and inclusive workplace environment.

Evidences examined:

1. Documentation, policies, procedures and Records.
2. Interviews and Observations.
3. Production Records.
4. Grievance Mechanisms:
5. Legal compliance records.
6. Site tour.
7. Work contracts were reviewed for all workers to ensure noticed periods; each worker receives a copy of signed contract by both parties.
8. Personal files were reviewed for workers to review the workers hiring documents (copy of birth certificate, copy of ID cards, copy of signed contract).
9. Payment records.
10. Attendance records.

7. No discrimination is practiced

Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)?	2%
Representation of women in managerial roles (ratio of women workers to women managers)	1%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	4%
Three most common nationalities in managerial and supervisory roles	Egyptian

8. Regular employment is provided

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The organization has established robust management systems to ensure regular employment through comprehensive policies, managerial oversight, and employee training. However, a minor nonconformity regarding contract accuracy was identified. Management has acknowledged the issue and is implementing corrective actions to enhance compliance, transparency, and consistency in contract management.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

Systems and evidence examined to validate this code section

Current system:

The facility has implemented clear and transparent systems to ensure that all workers are employed on a regular and legal basis. A thorough review of employment contracts, payroll records, and attendance logs confirmed that all employees have formal, written contracts that meet legal requirements. Worker interviews further validated that employees are fully aware of their terms of employment, including wages, working hours, and benefits. No instances of casual, undocumented, or precarious employment were identified, demonstrating the facility's commitment to providing stable and secure employment for its workforce.

Evidence examined:

1. Documentation, policies, procedures, and Records.
2. Interviews and Observations.
3. Production Records.
4. Grievance Mechanisms:
5. Legal compliance records.
6. Site tour.
7. Work contracts were reviewed for all workers to ensure notice periods; each worker receives a copy of the signed contract by both parties.
8. Personal files were reviewed for workers to review the workers hiring documents (copy of birth certificate, copy of ID cards, copy of the signed contract).
9. Payment records.
10. Attendance records.

8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed	100.0%
Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment	0.0%
Percentage of workers employed as apprentices, trainees or interns	0.0%

8.A. Sub-contracting and homeworkers are used responsibly

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The organization has established robust systems to ensure the responsible and ethical use of sub-contractors and homeworkers through effective policies, managerial oversight, comprehensive training, and continuous monitoring, reflecting its commitment to compliance and best practices.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

Systems and evidence examined to validate this code section

Current system:

The facility does not engage in the use of subcontractors or homeworkers, ensuring full oversight and control over all aspects of its operations. A thorough review of supply chain records and interviews with management confirmed that all production activities are carried out in-house, with no external subcontracting or homework involved. This approach ensures greater transparency, accountability, and compliance with labor standards. The facility's direct employment model reflects its commitment to responsible and ethical sourcing practices.

Evidences examined:

1. Documentation, policies, procedures and Records.
2. Interviews and Observations.
3. Production Records.
4. Grievance Mechanisms:
5. Legal compliance records.
6. Site tour.
7. Work contracts were reviewed for all workers to ensure noticed periods; each worker receives a copy of signed contract by both parties.
8. Personal files were reviewed for workers to review the workers hiring documents (copy of birth certificate, copy of ID cards, copy of signed contract).
9. Payment records.
10. Attendance records.

8.A. Sub-contracting and homeworkers are used responsibly

Data points

Are homeworkers employed directly or engaged through an agent? Not applicable

Gender disaggregated data available

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homeworker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers? No
None

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity? No
None

Are any sub-contractors used? No

9. No harsh or inhumane treatment is allowed

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The organization has implemented robust systems to prohibit and prevent harsh or inhumane treatment, supported by clear policies, managerial oversight, comprehensive training, and active monitoring, ensuring a respectful and dignified workplace for all employees.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

Systems and evidence examined to validate this code section

Current system:

The facility has robust policies in place prohibiting any form of harsh or inhumane treatment, including physical abuse, verbal abuse, or any form of intimidation or punishment. A review of disciplinary records and procedures revealed no evidence of such practices, and worker interviews confirmed that employees are treated with respect and dignity in all interactions. The facility also conducts regular training for both management and staff on appropriate workplace behavior and conflict resolution, reinforcing its commitment to maintaining a positive and respectful work environment. No reports or indications of mistreatment were found during the assessment.

Evidences examined:

1. Documentation, policies, procedures and Records.
2. Interviews and Observations.
3. Production Records.
4. Grievance Mechanisms:
5. Legal compliance records.
6. Site tour.
7. Work contracts were reviewed for all workers to ensure noticed periods; each worker receives a copy of signed contract by both parties.
8. Personal files were reviewed for workers to review the workers hiring documents (copy of birth certificate, copy of ID cards, copy of signed contract).
9. Payment records.
10. Attendance records.

9. No harsh or inhumane treatment is allowed

Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?	Yes, there is a formal grievance process
What type of grievance mechanism(s) are available?	Open door policy and grievances boxes
Number of grievances raised in the last 12 months	0
Number of grievances resolved in the last 12 months	0

10.A. Environment 2-Pillar

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The organization has established robust systems to protect the environment, featuring effective policies, managerial oversight, comprehensive training, and active monitoring to ensure compliance, minimize impact, and promote sustainability.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section	<p>Current systems: The facility established HSE risk assessment which reviewed and updated annually. Last review dated 1/1/2024. The facility monitors the internal work environment to keep healthy environmental for workers.</p> <p>Evidence examined:</p> <ul style="list-style-type: none"> - Environmental management system documentation. - All legally required environmental documents were provided for review. - Environmental policy - Site tour 		

10.A. Environment 2-Pillar

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?	No
Does the site have any valid environmental or energy management certificates?	The facility is certified according to ISO 14001:2015 valid until 3\2\2025
Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?	No
Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?	No

Attachments



[CAPR-London.pdf](#)



[Photo report.pdf](#)





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