



# Sedex Members Ethical Trade Audit Report

**Version 6.1**



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 1084104	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 1059648	
Business name (Company name):	Egyland – EgyFarm			
Site name:	Egyland – EgyFarm			
Site address: <i>(Please include full address)</i>	K 88, Cairo-Alexandria Desert Road, Wadi El Natron, Behaira Government.	Country:	Egypt	
Site contact and job title:	Mr. Ahmed Nady Amin – Executive Manager			
Site phone:	+20201068139399	Site e-mail:	<a href="mailto:m.saad@egyfarm.com">m.saad@egyfarm.com</a>	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar	<input type="checkbox"/> Business Ethics
Date of Audit:	May 16, 2021			

<b>Audit Company Name &amp; Logo:</b>  	<b>Report Owner (payer):</b> <i>(If paid for by the customer of the site please remove for Sedex upload)</i>  Egyland – EgyFarm
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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](mailto: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): None

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

Lead auditor: Ahmed Fathy Ahmed / APSCA number: 21704954

Lead auditor APSCA status: In Good Standing

Team auditor: NA / APSCA number:

Interviewers: Ahmed Fathy Ahmed / APSCA number: 21704954

Report writer: Ahmed Fathy Ahmed

Report reviewer: Smita Sudheesh

Date of declaration: May 16, 2021

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

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

## Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A <a href="#">Universal Rights covering UNGP</a>			<input type="checkbox"/>	<input type="checkbox"/>				None
0B <a href="#">Management systems and code implementation</a>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			1	GE: <ul style="list-style-type: none"> <li>Facility has BRC Global standard for food safety certificate, Global GAP/GRASP certificate and ISO9001:2015 certificate.</li> </ul>
1. <a href="#">Freely chosen Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None
2. <a href="#">Freedom of Association</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None
3. <a href="#">Safety and Hygienic Conditions</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	5		1	NC: <ol style="list-style-type: none"> <li>No rubber mats were placed under the electrical control panels in the packhouse.</li> <li>3 fire extinguishers in the packhouse production area are not accessible (blocked access).</li> <li>Two forklift workers are not worn safety shoes.</li> <li>2 fire extinguishers in the female worker rest area are incorrect height.</li> </ol>

									5. 2 fire extinguishers in the kitchen area were placed directly on the ground.  GE: Training of staff against Covid-19 and proper policies and control measures in place
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None
5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>			1	GE: Transportation is provided free of charge.
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Not Applicable
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Not Applicable

General observations and summary of the site:

**Audit Process:** This initial audit was conducted by Independent Auditor. One auditor assessed / verified the farm's operations against the ETI Base Code and Egyptian legislations on a sampling basis in one day.



**Overview of opening meeting, farm management responses:** At 07:30 am 16/05/2021, auditor entered the facility then held an opening meeting according to the ETI Base Code; Mr. Mohamed Saad (Quality Assurance Manager), Ahmed Nadi Amin (Executive Manager), Mr. Tamer Abdo (Farm Manager), Mr. Amar Khamis El Hawary (Packhouse Manager), Mr. Hany Gad (Quality Control), Radwa El Saadany (HR Manager), Mr. Hassan Ragaay (HR Supervisor), Mr. Ahmed Kamal (Environmental Responsible) and Mr. Abdel Nabi Mohamed Embark (Elect Worker Representative) were present in the meeting. They stated that they would be co-operative with this audit.

**Site Summary:**

- The facility is a farm and packhouse for Fruits (grapes, Dates, Mangoes and peaches).
- Overall responsibility for meeting the standards is taken by Mr. Ahmed Nadi Amin (Executive Manager).
- There are total of 100 employees on site, 32 are permanent employees, 68 are seasonal employees, all are local workers.
- The youngest worker on site is 19 years old.
- There is no union at this facility.
- Production season: January to December.
- Site does not use sub-contractors.
- 10 workers were selected for interview (4 male and 6 female), they were interviewed as 1 group of 4 and balance of 6 workers were interviewed individually.
- 3 months of time and payment records were available for review from which 10 Records to show wages and hours were taken from January 2021, February 2021, April 2021.

**Summary of observations:**

None

**Summary of Findings (positive and negative):**

In view of the findings raised, below non-compliance was noted in the area of Safety and Hygienic Condition and Environment. For other areas, no violations were noted.

**Negative:**

- 3:
1. No rubber mats were placed under the electrical control panels in the packhouse.
  2. 3 fire extinguishers in the packhouse production area are not accessible (blocked access).
  3. Two forklift workers are not worn safety shoes.
  4. 2 fire extinguishers in the female worker rest area are incorrect height.
  5. 2 fire extinguishers in the kitchen area were placed directly on the ground.

**Good Examples:**

1. Transportation is provided free of charge.
2. Training of staff against Covid-19 and proper policies and control measures in place.
3. Facility has BRC Global standard for food safety certificate C0179058 valid until 04/06/2021, facility has Global GAP certificate GGN4052852485227 valid until 13/09/2021, facility has GRASP certificate GGN4052852485227 valid until 13/09/2021 and facility has ISO9001:2015 certificate No. ICERT/EG/QMS/0028/21 valid until 08/02/2024.

**Auditors' Note:**

- The audit done during the Grapes harvest.
- There is packing operation during audit time.

*\*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:	Egyland - EgyFarm	
B: Site name:	Egyland – EgyFarm	
C: GPS location: (If available)	GPS Address: K 88, Cairo-Alexandria Desert Road, Wadi El Natron, Behaira Government, Egypt.	Latitude: 30.2965N Longitude: 30.5217E
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p>The site is a registered food business with the local trading standards.</p> <p>Company registration number: 82842 and 61331</p> <p>Taxes registration number: 416-288-480 and 274-488-655</p> <p>Export registration number: 70425</p> <p>Packhouse registration number: 40689/2015</p> <p>Land registration number: 269</p> <p>Water wall license number: 947, 970</p>	
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Fresh Table Grapes (Farming, Growing, Sorting, Pack-house)	
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Egyland - Egyfarm was founded in 2008 as a family business dedicated to production, packing and export of fresh fruits (grapes, Oranges, Dates, Mandarins, Mangoes and peaches). The pack house is located within the farm site and covers 2276 square meters. All crops (grapes, Dates, Mangoes and peaches) are grown in their 106 ha field. All produce is certified against Global GAP, Tesco NM, ISO 9001:2015 and Global BRC certification. The farm contains of administration building: pack house, dormitory and stores. The production season for peaches start in April - finishes in May, Mangoes start in July-finished in October, Dates start in July –finished in October and Grapes starts in May - finishes in August. The total number of workers 32 permanent workers. The maximum number of seasonal workers during the peak season is about 68 workers. The farm consists of farm and pack house, worker's dormitory, administration offices and stores. Working hours in the factory are in one shift from 07:00 to 16:00 with total of 1 hour break per day and 1 day off per week.</p>	

	For below, please add any extra rows if appropriate.		
	Production Building no	Description	Remark, if any
	Floor 1	Packhouse: Quality control, packing section, cooling, and final product warehouse, Accommodation building and stores.	Ground floor
	Floor 2	Packhouse: Admin office	1 <sup>st</sup> floor
	Floor 3		
	Floor 4		
	Is this a shared building?	No	None
<p>F1: Visible structural integrity issues (large cracks) observed?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: None</p> <p>F3: Does the site have a structural engineer evaluation?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>F4: Please give details:                  None</p>			
G: Site function:	<input type="checkbox"/> Agent <input type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input checked="" type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input checked="" 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)	From April to October.		
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	The total number of workers is 100 workers and dormitory provide. The main operations are agricultural operation, packing, storage and exporting for Fruits. Equipment are different based on the crops and operation but generally are: irrigation drip system, tractors, sprayers, packing, forklift and cold storage. The products being produced are grapes, dates, mangoes, peaches. There are 4 simple packing/ production lines.		

<p>J: What form of worker representation / union is there on site?</p>	<p><input type="checkbox"/> Union (name)  <input type="checkbox"/> Worker Committee  <input checked="" type="checkbox"/> Other (specify) : There is one worker representative elected by workers.  <input type="checkbox"/> None</p>
<p>K: Is there any night production work at the site?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p>
<p>L: Are there any on site provided worker accommodation buildings e.g. dormitories</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  L1: If yes, approx. % of workers in on site accommodation  14% of them lives at the provided company dormitory.</p>
<p>M: Are there any off site provided worker accommodation buildings</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  M1: If yes, approx. % of workers:  NA</p>
<p>N: Were all site-provided accommodation buildings included in this audit</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  N1: If no, please give details</p>

Audit Parameters			
A: Time in and time out	Day 1 Time in: 07:30 Am Day 1 Time out: 15:30 Pm	A3: Day 2 Time in: A4: Day 2 Time out:	A5: Day 3 Time in: A6: Day 3 Time out:
B: Number of auditor days used:	One auditor in one day		
C: Audit type:	<input checked="" type="checkbox"/> Full Initial <input 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 E1: 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 <b>Yes</b> , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mr. Ahmed Nady Amin – Executive 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:	22/08/2019		
J: Previous audit type:	Full Initial		
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 checked="" type="checkbox"/> Yes <input 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 checked="" type="checkbox"/> Yes <input 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	There is no workers committee in the facility, there is one worker representative elected by workers 27/04/2021.		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	There is no union in the facility		

## Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	32	8	0	0	0	0	0	40
Worker numbers – female	0	60	0	0	0	0	0	60
Total	32	68	0	0	0	0	0	100
Number of Workers interviewed – male	3	1	0	0	0	0	0	4
Number of Workers interviewed – female	0	6	0	0	0	0	0	6
Total – interviewed sample size	3	7	0	0	0	0	0	10



A: Nationality of Management	Egyptian	
<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first.</p> <p><i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities:</p> <p>B1: Nationality 1: Egyptian</p> <p>B2: Nationality 2: _____</p> <p>B3: Nationality 3: _____</p>	<p>Was the list completed during peak season?</p> <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods:</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx % total workforce: Nationality 1 : 100%</p> <p>C1: approx % total workforce: Nationality 2 _____</p> <p>C2: approx % total workforce: Nationality 3 _____</p>	
D: Worker remuneration <i>(management information)</i>	<p>D: NA % workers on piece rate</p> <p>D1: NA % hourly paid workers</p> <p>D2: 100 % salaried workers</p> <p>Payment cycle:</p> <p>D3: NA % daily paid</p> <p>D4: 68 % weekly paid</p> <p>D5: 32 % monthly paid</p> <p>D6: NA % other</p> <p>D7: If other, please give details</p>	





Worker Interview Summary		
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	3 group (4 workers in each group)	
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 4	D2: Female: 2
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details NA	
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?	None	
I: What did the workers like the most about working at this site?	Management attitude and how they are treat them, wages are always paid on time	
J: Any additional comment(s) regarding interviews:	None	
K: Attitude of workers to hours worked:	Workers confirmed that regular working hours do not exceed the legal limit and there is no overtime work.	
L. Is there any worker survey information available?		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details:		
M: Attitude of workers:		

*(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*

The attitude of the interviewed workers was fine through the audit process, there is no major issues was raised by them as they confirmed that the farm management are well treating them.

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*

One worker representatives attended the audit process and they explained that they were elected by workers on 27/04/2021 and the workers committee will work for 1 years then a new election process is required.

O: Attitude of managers:

*(Include attitude to audit, and audit process. Both positive and negative information should be included)*

The farm management were cooperative with the auditor during all the audit process and accept all audit findings.

## 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 established a set of policies number 23 v3 issue date 01/08/2019 and updated signed on 01/01/2021, signed by Mr. Tamer Soror (General Manager) covering different aspects of human rights including child labour, prevention of discrimination, forced labour, sexual harassment, health and safety, applicable with local legal and another requirements & grievance mechanism.

The policies are communicated and posted at several areas in the company and therefore communicated to all staff.

Ahmed Nadi Amin (Executive Manager) is designated person responsible for implementing standards concerning human rights.

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

##### Details:

- Management interview.
- Ethical policy, ETI code
- 

##### Any other comments:

- None.

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  A1: Please give details:                  Policy number 23 v3 issue date 01/08/2019 and updated signed on 01/01/2021, signed by Mr. Tamer Soror (General Manager).</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Please give details:                  Name: Ahmed Nadi Amin                  Job title: Executive Manager</p>
<p>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?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  C1: Please give details:                  No any negative issue observed                  Open door for grievance system.</p>
<p>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)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  D1: If no, please give details</p>
<p>E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  E1: Please give details:                  Procedures implemented, responsible for workers information data is the Ahmed Nadi Amin (Executive Manager).</p>

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

Good examples observed:	
<p><b>Description of Good Example (GE):</b> None</p>	<p><b>Objective Evidence Observed:</b> None</p>

## 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: 2020 0 %	A2: This year 2021 0 %
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 <sup>st</sup> day of 90 day period + number of employees on the last day of the 90 day period) / 2]	0 %	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 <sup>st</sup> day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 2020 0 %	C2: This year 2021 0 %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 <sup>st</sup> of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	0 %	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: A booklet is available. A distribution list for plasters was also available	
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: 2020 Number: 0	F2: This year: 2021 Number: 0
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: 2020 0%	H2: This year: 2021 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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<b>0B: Management system and Code Implementation</b> <a href="#">(Click here to return to summary of findings)</a>
<p>0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p> <p>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</p> <p>0.B.3 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.</p> <p>0.B.4 Suppliers are expected to communicate this Code to all employees.</p> <p>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.</p>

<b>Current Systems and Evidence Examined</b> <i>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.</i>
<p><b>Current systems:</b></p> <ul style="list-style-type: none"> <li>Company developed polices and maintains systems reflecting the ETI code of conduct requirements and assigned member of the management to monitor the implementation of the system.</li> <li>The company is assigning senior member/HR Manager: Radwa El Saadany, HR Supervisor: Hassan Ragaay and Executive Manager: Ahmed Nadi Amin are responsible for social compliance issues.</li> <li>There is an ethical policy in the facility containing all code aspects.</li> <li>The company communicates ETi Code to all employees by training as confirmed by training records on 03/01/2021, 05/01/2021, 07/01/2021, 09/01/2021 and worker interviews.</li> </ul> <p><b>Evidence examined – to support system description (Documents examined &amp; relevant comments. Include renewal/expiry date where appropriate):</b>            Details: Company roles and regulation, company polices, monitoring system report, self-assessment report, Management interview, Worker interview.</p> <p><b>Any other comments:</b>            None</p>

<b>Management Systems:</b>	
A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: Please give details: None
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Facility social policy is covering forced labour, child labour, discrimination, and harassment & abuse.

<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>Management is not keeping the workers original records or give the worker receipt for original records until worker received again.          Facility internal rules and regulations is covering forced labor, child labor, discrimination and harassment and abuse.          Policies are communicated to employees during orientation process upon hire and annually and through posters in the facility notice board.          Through documents review, workers interview, internal rules review, no sign of forced labor, child labor, discrimination and harassment and abuse was noted in the facility.</p>
<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment &amp; abuse?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No          D1: Please give details:          Standards for forced labour, child labour, discrimination, harassment, and abuse are communicated to employees during orientation process upon hire and annually and through posters in the notice board.</p>
<p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No          E1: Please give details:          Verified through interviews of employees, training records available. Training records on 03/01/2021, 05/01/2021, 07/01/2021, 09/01/2021 with attendance list.</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          F1: Please give details:          Facility has BRC Global standard for food safety certificate C0179058 valid until 04/06/2021, facility has Global GAP certificate GGN4052852485227 valid until 13/09/2021, facility has GRASP certificate GGN4052852485227 valid until 13/09/2021 and facility has ISO9001:2015 certificate No. ICERT/EG/QMS/0028/21 valid until 08/02/2024.</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          G1: Please give details:          There is HR department in the facility, there is an HR Manager, Radwa El Saadany.</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          H1: Please give details:          There is HR department in the facility.</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                      I1: Please give details:                      Policy to ensure the workers' information is confidential existed. Copies of workers' documents are kept locked under the responsibility of the HR manager and HR assistant.</p>
<p>J: Is there an effective procedure to ensure confidential information is kept confidential?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      J1: Please give details:                      Procedures existed. Confidential documents are kept locked by the HR manager and HR assistant</p>
<p>K: Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      K1: Please give details:                      Health and safety risk assessments is conduct on regular basis to evaluate the effectiveness of facility's management system, code implementation, policy and procedures (latest risk assessment was conducted on 01/01/2021).</p>
<p>L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      L1 Please give details:                      Corrective actions are taken for issues raised when conducting risk assessment including implementation of controls.</p>
<p>M: Does the facility have a policy/code which require labour standards of its own suppliers?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      M1: Please give details:                      copy of the relevant policies are sent to the suppliers.</p>
<p><b>Land rights</b></p>	
<p>N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      Details:                      Packhouse registration number: 40689/2015                      Land registration number: 269                      Water wall license number : 947, 970</p>
<p>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?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      Details:                      Compliance with laws and regulations has been established in the facility.</p>
<p>P: Does the site have a written policy and procedures specific to land rights.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>

<p>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</p>	<p>If yes, how does the company obtain FPIC:                  Packhouse registration number: 40689/2015                  Land registration number: 269                  Water wall license number : 947, 970,                  policy and procedures specific to land rights sat according to the local laws and regulations</p>
<p>Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No                  Details:                  NA, Packhouse registration number: 40689/2015                  Land registration number: 269                  Water wall license number : 947, 970</p>
<p>R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  R1: Please give details: None</p>
<p>S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  S1: Please give details:                  Nothing noticed during the audit.</p>

Non-compliance:	
<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI/Additional Elements  <input type="checkbox"/> NC against customer code:                   None</p> <p><b>Local law and/or ETI requirement:</b>                  None</p> <p><b>Recommended corrective action:</b>                  None</p>	<p><b>Objective evidence observed:</b>                  (where relevant please add photo numbers)                   None</p>

Observation:	
<p><b>Description of observation:</b>                  None</p> <p><b>Local law or ETI requirement:</b>                  None</p> <p><b>Comments:</b>                  None</p>	<p><b>Objective evidence observed:</b>                   None</p>

**Good Examples observed:**

Description of Good Example (GE):

- Facility has BRC Global standard for food safety certificate C0179058 valid until 04/06/2021,
- facility has Global GAP certificate GGN4052852485227 valid until 13/09/2021,
- facility has GRASP certificate GGN4052852485227 valid until 13/09/2021 and f
- acility has ISO9001:2015 certificate No. ICERT/EG/QMS/0028/21 valid until 08/02/2024.

**Objective evidence observed:**

Certificate review.

**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:**

- There is no forced labour or forced practices was noted during the audit process, workers reported that they are free to leave the work after the working hours and the overtime is totally voluntary.
- There is a senior member of management who is responsible for compliance with the Code (Radwa El Saadany - HR Manager).
- All the workers have a legal relation with the farm management and signed on the employment contract, and they are free to join or to leaves and not forced to work at the farm.
- The company established a policy to ensure employment is freely chosen. The policy includes the following clause:
  1. The company does not require deposit or withhold employees' ID cards.
  2. The company does not limit the employees' freedom.
  3. There is no forced, bonded or involuntary prison labour.
  4. Employees are free to leave their employer after reasonable notice. Workers confirmed they are free to leave any time.

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

Details:

Workers personal files, Policy documents, employment contract, Contracts to establish notice periods, company roles and procedures, resignation records, worker interviews.

During workers' interview and files review found that workers were not required to lodge "deposits" or their identity papers with their employer and is free to leave their employer.

Any other comments:

None

A: Is there any evidence of retention of original documents, e.g. passports/ID's

Yes

No

A1: If yes, please give details and category of workers affected:

B: Is there any evidence of a loan scheme in operation

Yes

No

B1: If yes, please give details and category of worker affected:

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:
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding: Contract available – no restriction on termination
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding:
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding: None
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: There are established policy and procedures confirms the understanding the risk of forced/ trafficked/ bonded labour in its supply chain.
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: There are established policy and procedures confirms the understanding the risk of forced/ trafficked/ bonded labour in its supply chain. Confirmed between worker and HR department upon hiring.

<b>Non-compliance:</b>	
<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law:    <input type="checkbox"/> NC against customer code:                      None</p> <p><b>Local law and/or ETI requirement</b>                      None</p> <p><b>Recommended corrective action:</b>                      None</p>	<p><b>Objective evidence observed:</b>                      (where relevant please add photo numbers)</p> <p>None</p>

Observation:	
<b>Description of observation:</b> None	<b>Objective evidence observed:</b>  None
<b>Local law or ETI requirement:</b> None	
<b>Comments:</b> None	

Good Examples observed:	
<b>Description of Good Example (GE):</b>  None	<b>Objective evidence observed:</b>  None

**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:**

- Through the company management interview and workers' interview, it was noted that there wasn't union in the company however there is no restriction from employer to let the workers join any external union.
- It was noted that there are worker representatives was elected by their other colleagues.
- Workers can raise their concerns through workers' representatives, HR Manager, suggestion box.
- Workers can raise their concerns directly to their supervisor and the top management.
- The relationship between the management and the employees is excellent.
- The employees who were interviewed declared that they feel free to discuss any concerns with management.

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

Details:

Workers representatives elected by the workers them self's on 27/04/2021.

Meeting minutes for the workers representative every month, Management interview, Worker interview, Suggestions from the suggestion box and actions taken.

Any other comments:

None

<p>A: What form of worker representation/union is there on site?</p>	<p><input type="checkbox"/> Union (name)  <input type="checkbox"/> Worker Committee  <input checked="" type="checkbox"/> Other (specify) : Worker representative  <input type="checkbox"/> None</p>
<p>B: Is it a legal requirement to have a union?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p>
<p>C: Is it a legal requirement to have a worker's committee?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p>



<p>D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&amp;S, sexual harassment)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Complain and suggestion box and there is a worker representative in the facility</p> <p>D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: workers representative election dated 27/04/2021, workers representative meeting with management dated 28/04/2021.</p>	
<p>F: Name of union and union representative, if applicable:</p>	<p>Not applicable. There isn't union in the company.</p>	<p>F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p>
<p>G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?</p>	<p>Workers representatives and suggestion box.</p>	<p>G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>H: Are all workers aware of who their representatives are?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>workers were aware of the workers representative</p>
<p>I: Were worker representatives freely elected?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>I1: Date of last election: Date of last election: 27/04/2021</p>
<p>J: Do workers know what topics can be raised with their representatives?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>K: Were worker representatives/union representatives interviewed?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b>, please state how many: 1 worker representatives was interviewed during the audit process.</p>	
<p>L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.</p>	<p>There is no workers committee or union in the facility. Monthly meeting with site representative and management representatives and topics related to workers well fare were discussed. Date of last meeting on 28/04/2021; 3 hours were communicated.</p>	
<p>M: Are any workers covered by Collective Bargaining Agreement (CBA)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	
<p>If <b>Yes</b>, what percentage by trade Union/worker representation</p>	<p>M1: NA % workers covered by Union CBA</p>	<p>M2: NA % workers covered by worker rep CBA</p>

M3: If <b>Yes</b> , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA
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Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None	<b>Objective evidence observed:</b> (where relevant please add photo numbers)  None
<b>Local law and/or ETI requirement:</b> None	
<b>Recommended corrective action:</b> None	

Observation:	
<b>Description of observation:</b> None	<b>Objective evidence observed:</b> None
<b>Local law or ETI requirement:</b> None	
<b>Comments:</b> None	

Good Examples observed:	
<b>Description of Good Example (GE):</b> None	<b>Objective evidence observed:</b> 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:

Senior management is assigned to be responsible on the health and safety.

Through farm and stores tour, it was noted that:

- They were well ventilated.
- Exit signs were installed.
- PPE such as masks and gloves were provided to workers and visitor (required due to Covid-19). Rules for the wearing of protective clothing have been developed.
- There are documented training programs in place covering the training needs of relevant personnel. The company ensures that all employees are adequately trained, instructed and supervised and staff is able to demonstrate competency to conduct the activities witnessed during this audit. All seasonal staff, before commencing work, receive a training session for on their job description - responsibilities and basic hygiene rules. All seasonal workers are trained against H&S before employment.
- Drinkable water was available in workshops and results were in compliance with legal limits. Water used within the operation is potable and drawn from main community supply. Annual chemical and microbiological analyses take place from external laboratory (QCAP) on 02/02/2021 CN993339 and chemical analysis take place from external laboratory (Ain Shams University) on 11/03/2021.
- Workers receive regular and recorded health & safety training such as fire drill on 07-08/08/2019.
- First aid kit in proximity to the work area & readily available in all sections in all over the facility.
- 5 First aid kits present in the farm and packhouse. First aid kits were adequately equipped
- There is a list of employees trained on first aid and training certificates were reviewed by auditor (8 employees – last training was conducted on 14-16 February 2021 by Egyptian Red crescent.
- There is a valid maintenance contract with an external company for the regular maintenance of fire extinguishers.
- Accident reporting procedure and booklet available: Accident book – 0 cases.
- Training for H&S is provided to all workers at induction e.g. reviewed for date 13/01/2021, and ETI policy 03/01/2021, 05/01/2021, 07/01/2021, 09/01/2021.
- Microbus are provided by the company for employees free transportation, driving license was reviewed for the driver licenses.

- Internal training related to use of chemicals is in place on 05/01/2021 and there is a list of chemicals used in the facility, managed and updated by Technical Engineer.
- Medical screening before the recruitment of staff. Health certificates (valid for 1 year) for all employees are a prerequisite upon hiring.
- Adequate numbers of clean and separate toilets.
- Evacuation plan posted in each section of the facility.
- Exits are clearly marked with battery operated light.
- Fire drill was conducted periodically – last fire drill was conducted on 08/05/2021.
- There is a list of employees trained on the use of firefighting equipment and training certificates were reviewed by auditors (e.g. 3 employees – last training was conducted during 07-08/08/2019).
- There is a valid maintenance contract with an external company for the regular maintenance of fire extinguishers.
- Light, noise, temperature and particularities of dust were adequate, assessed on 15th of March 2021 and results were within legal limits.

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

Details:

Risk assessment report - Health and safety system - health and safety committee minuetts of meeting – training records – fire drill training reports – farm and stores tour.

Any other comments:

None

<p>A: Does the facility have general and occupational Health &amp; Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  A1: Please give details:</p> <ul style="list-style-type: none"> <li>• Health &amp; Safety producers and policy has been established in the facility.</li> <li>• There is a health &amp; safety committee in the facility from 3 members</li> </ul>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  B1: Please give details:</p> <ul style="list-style-type: none"> <li>• Health &amp; Safety policy found posted in the facility notice board.</li> <li>• Health and safety instruction found posted in the facility according to the risks locations in the facility.</li> </ul>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  C1: Please give details:                  NA</p>
<p>D: Are visitors to the site informed on H&amp;S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  D1: Please give details:                  Health &amp; Safety induction provided to the visitor upon arriving</p>
<p>E: Is a medical room or medical facility provided for workers?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  E1: Please give details:</p>

If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.	Small farm and packhouse with 5 first aid boxes
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: There are 5 first aiders in the facility (8 staffs have training on 14-16/02/2021)
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: Transportation is provided free of charge
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: No accommodation provided
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 has been established in the facility and covering all the facility sections
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:
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:

**Non-compliance:**

**1. Description of non-compliance:**

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

It was noted during the audit process that there are no rubber mats were placed under the electrical control panels in the packhouse.

**Local law or ETI requirement:**

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.

**Recommended corrective action:**

It is recommended that management to install isolator under the electric control panels in the packhouse.

**Objective evidence observed:**

*(where relevant please add photo numbers)*

Site tour

<p>Timescale: 30 days Verification  Method: Desktop review.  Agreed by Management and Name of Responsible Person: Mr: Ahmed Nadi Amin - Executive Manager</p>	
<p><b>2. Description of non-compliance:</b>  <input checked="" type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:  It was noted during the audit process that 3 fire extinguishers in the packhouse production area are not accessible (blocked access).</p> <p><b>Local law and/or ETI requirement:</b>  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.</p> <p><b>Recommended corrective action:</b>  It is recommended that management to insure all fire extinguisher is able to access all the time.</p> <p>Timescale: 30 days Verification  Method: Desktop review.  Agreed by Management and Name of Responsible Person: Mr: Ahmed Nadi Amin - Executive Manager</p>	<p>Site tour</p>
<p><b>3. Description of non-compliance:</b>  <input checked="" type="checkbox"/> NC against ETI      <input checked="" type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:  It was noted during the audit process that there are two forklift workers are not worn safety shoes.</p> <p><b>Local law and/or ETI requirement:</b>  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.</p> <p>Law Article 209: In accordance with the Egyptian Labour law 12/2003, The establishment and its branches shall take all precautions and measures as necessary to provide the means of vocational safety and health and ensuring labour environment security for protection from mechanical dangers resulting from colliding the worker's body with a solid body, particularly the following:  a) All danger arising from work tools and machines comprising lagging and lifting equipment, articles, apparatuses, and means of transport, handling and power transmission.</p>	<p>Site tour</p>

<p>b) All danger arising from construction, building, and digging works, and risks of collapse and downfall.</p> <p><b>Recommended corrective action:</b> It is recommended that management to insure all of forklift workers are wear safety shoes.</p> <p>Timescale: 30 days Verification Method: Desktop review. Agreed by Management and Name of Responsible Person: Mr: Ahmed Nadi Amin - Executive Manager</p>	
<p><b>4. Description of non-compliance:</b> <input checked="" type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code: It was noted during the audit process that 2 fire extinguishers in the female worker rest area are incorrect height.</p> <p><b>Local law and/or ETI requirement:</b> 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.</p> <p><b>Recommended corrective action:</b> It is recommended that management to insure all fire extinguisher are correctly height.</p> <p>Timescale: 30 days Verification Method: Desktop review. Agreed by Management and Name of Responsible Person: Mr: Ahmed Nadi Amin - Executive Manager</p>	<p>Site tour</p>
<p><b>5. Description of non-compliance:</b> <input checked="" type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code: It was noted during the audit process that there are 2 fire extinguishers in the kitchen area were placed directly on the ground.</p> <p><b>Local law and/or ETI requirement:</b> 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.</p> <p><b>Recommended corrective action:</b> It is recommended that management to install fire extinguishers on walls at correct height.</p>	<p>Site tour</p>

<p>Timescale: 30 days Verification          Method: Desktop review.          Agreed by Management and Name of Responsible Person: Mr: Ahmed Nadi Amin - Executive Manager.</p>	
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Observation:	
<p><b>Description of observation:</b> None</p> <p><b>Local law or ETI requirement:</b> None</p> <p><b>Recommended corrective action:</b>  None</p>	<p><b>Objective evidence observed:</b> None</p>

Good Examples observed:	
<p><b>Description of Good Example (GE):</b>  Training of staff against Covid-19 and proper policies and control measures in place on 04/01/2021.</p>	<p><b>Objective Evidence Observed:</b>  Interview with employees</p>



**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:**

- The company establishes a policy that will never employ and use any child labour under the age of 16 years old. Youngest workers currently at the company are 19 years old (date of birth 13/01/2002, crosschecked with employees' files).
- There is no child labour was found at the farm and there is clear system in place preventing the use of any child, the system starts at the site gate as the security guard have to check the workers national ID or birth certificate to verify the age, the personal department is responsible on double check the workers age and workers have to present his birth certificates prior to working.

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

Details:

Company policy and recruitment system; workers personal files, management interview, worker interview.

Any other comments:

None

A: Legal age of employment:	16 years
B: Age of youngest worker found:	19 years
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? <a href="#">(Go to clause 3 – Health and Safety)</a>	<input type="checkbox"/> Yes <input type="checkbox"/> No E1: If yes, give details NA

Non-compliance:	
<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:                      None</p> <p><b>Local law and/or ETI requirement:</b>                      None</p> <p><b>Recommended corrective action:</b>                      None</p>	<p><b>Objective evidence observed:</b>                      (where relevant please add photo numbers)</p> <p>None</p>

Observation:	
<p><b>Description of observation:</b>                      None</p> <p><b>Local law or ETI requirement:</b>                      None</p> <p><b>Comments:</b></p>	<p><b>Objective evidence observed:</b></p> <p>None</p>

Good Examples observed:	
<p><b>Description of Good Example (GE):</b>                      None</p>	<p><b>Objective Evidence Observed:</b>                      None</p>

**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 company follows the legal requirement regarding the payment of wages.
- No minimum wages identified by law.
- there are no excessive deductions from the salary – workers are aware about the wages polices and how to calculate the salary.
- Employees are paid regularly in cash.
- Wages are not withheld as a deposit.
- Contracts of employees and standard wages' payment records did not indicate any cases of deviation.
- Time record for permanent staffs: Fingerprint attendance records (with time in/out) and for seasonal workers: Manual attendance records (with time in/out) and worker's signature.
- Complete payroll records for 10 employees were reviewed for the period January 2021, February 2021, April 2021.
- All workers receive a detailed pay slip for each month which includes all the legal deductions on their gross wage.
- This pay slip is signed by the employees and kept at the company's records.
- During the interviews, employees have reported that the company provides them free transport.

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

Details:

Company polices – payroll records – social insurance records – workers attendance records – wages and payroll system and calculation.

Any other comments:

None

Non-compliance:	
<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer                      code:                      None</p> <p><b>Local law and/or ETI requirement:</b>                      None</p> <p><b>Recommended corrective action:</b>                      None</p>	<p><b>Objective evidence observed:</b>                      (where relevant please add photo numbers)</p> <p>None</p>

Observation:	
<p><b>Description of observation:</b>                      None</p> <p><b>Local law or ETI requirement:</b>                      None</p> <p><b>Comments:</b>                      None</p>	<p><b>Objective evidence observed:</b>                      None</p>

Good Examples observed:	
<p><b>Description of Good Example (GE):</b>                      Transportation is provided free of charge.</p>	<p><b>Objective Evidence Observed:</b>                      Employees' interview – payment records review</p>

**Summary Information**

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal maximum: 48 hours/week, 8 hours/day 6 days per week	A1: 48 hours/week, 8 hours/day 6 days per week	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal maximum: 2 hours / day 12 hours / week	B1: No overtime No over hours	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<p>C: Wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i></p>	<p>Legal minimum: not specified by local law</p>	<p>C1: 3400 EGP/month for full time employees  3120 EGP /month for seasonal employees</p>	<p>C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>D: Overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i></p>	<p>Legal minimum: Day hours: 135% Night hours: 170% Public holiday: 200% Rest Day: 100% + 1 day rest in the following week</p>	<p>D1: No overtime work observed</p>	<p>D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

<p style="text-align: center;"><b>Wages analysis:</b> <i>(Click here to return to Key Information)</i></p>	
<p>A: Were accurate records shown at the first request?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>A1: If <b>No</b>, why not?</p>	<p>NA</p>
<p>B: Sample Size Checked <i>(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)</i></p>	<p>10 workers personal files, workers time document and payroll records were reviewed (January 2021, February 2021, April 2021).</p>
<p>C: Are there different legal minimum wage grades? If <b>Yes</b>, please specify all.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>C1: If <b>Yes</b>, please give details:</p>
<p>D: If there are different legal minimum grades, are all workers graded and paid correctly?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p> <p>D1: If <b>No</b>, please give details:</p>
<p>E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?</p>	<p><input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above</p> <p>E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i>  3400 EGP/month for full time employees</p>
<p>F: Please indicate the breakdown of workforce per earnings:</p>	<p>F1: ____% of workforce earning under minimum wage F2: ____% of workforce earning minimum wage F3: 100 % of workforce earning above minimum wage</p>

<p>G: Bonus Scheme found: Please specify details:</p>	<p>Bonus Scheme found: <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i></p> <p>Non observed</p>		
<p>H: What deductions are required by law e.g. social insurance? Please state all types:</p>	<p>Social insurance Income taxes</p>		
<p>I: Have these deductions been made?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>I1: Please list all deductions that <b>have</b> been made.</p>	<p>1. Social insurance 2. Income taxes Please describe: as per local law. there is no penalties system at this site</p>
		<p>I2: Please list all deductions that <b>have not</b> been made.</p>	<p>1. 2. Please describe: there is no penalties system at this site</p>
<p>J: Were appropriate records available to verify hours of work and wages?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
<p>K: Were any inconsistencies found? (if yes describe nature)</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>K1: Type</p> <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	
<p>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)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: The workers are not required to attend meetings before or after work.		
<p>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></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time:		
<p>M2: If yes, what was the calculation method used.</p>	<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: NA		

<p>N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      N1: Please give details:                      The facility's management review the wages on annual basis.</p>
<p>O: Are workers paid in a timely manner in line with local law?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>
<p>P: Is there evidence that equal rates are being paid for equal work:</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      P1: Please give details:                      The workers paid according to their profession qualities and according to the skills they have.</p>
<p>Q: How are workers paid:</p>	<p><input checked="" type="checkbox"/> Cash  <input type="checkbox"/> Cheque  <input type="checkbox"/> Bank Transfer  <input type="checkbox"/> Other                      Q1: If other, please explain:</p>

**6: Working Hours are not Excessive**

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

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

**ETI**

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

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

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

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

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- All the working hours were within the limits agreed by the local law (labour Law 12/2003) and the ETI code of conduct.
- No work is expected to be performed at home.
- Overtime work is voluntarily.
- Working hours comply with national law and are defined by contracts.
- Attendance records are manually kept and employees write their time in and time out and sign each day.
- According to the attendance records reviewed and the employees' interviews, standard working hours are 48 h / week – 6 days per week, from Saturday to Thursday (Friday day off).
- Working hours from 07:00 am till 16:00 pm with 1 hour break from 12:00pm till 13:00 pm.
- Over hours or overtime work payment was not observed in payroll records reviewed.
- Complete payroll records for 10 employees were reviewed for the period January 2021, February 2021, April 2021



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

Details:

Workers time records, payment records, production records, security records, working hour's policy.

Any other comments:

None

**Non-compliance:**

**1. Description of non-compliance:**

NC against ETI       NC against Local Law       NC against customer

code:

None

**Local law and/or ETI requirement:**

None

**Recommended corrective action:**

None

**Objective evidence observed:**

*(where relevant please add photo numbers)*

None

**Observation:**

**Description of observation:**

None

**Local law or ETI requirement:**

None

**Comments:**

None

**Objective evidence observed:**

None

**Good Examples observed:**

**Description of Good Example (GE):**

None

**Objective Evidence Observed:**

None

<b>Working hours' analysis</b> Please include time e.g. hour/week/month <a href="#">(Go back to Key information)</a>					
<b>Systems &amp; Processes</b>					
A. What timekeeping systems are used: time card etc.	Describe: - Finger print attendance records (with time in/out) for permanent staffs - Manual attendance records (with time in/out) and workers signature for seasonal workers.				
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details				
C: Are standard/contracted working hours defined in <b>all</b> 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:			
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 <b>yes</b> , 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 (1 day off at week)	
<b>Standard/Contracted Hours worked</b>		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency:
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details:
<b>Overtime Hours worked</b>		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 0	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	0 %	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	<p>L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements:</p> <p>Employment contract – company policy – workers feedback during the interviews.          According to the signed labor contracts, it was noted that the overtime working is according to the local laws, and from the workers interviews, it was noted that the workers are not forced to work overtime and it is voluntary.</p>
<b>Overtime Premiums</b>		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	<p>M1: Please give details of normal day overtime premium as a % of <b>standard</b> wages:</p> <p>No one in the sample worked overtime hours during the reviewed months, however facility policy is to apply the legal rate of 135% -170%</p>

<p>N: Is overtime paid at a premium?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>N1: If yes, please describe % of workers &amp; frequency:          No one in the sample worked overtime hours during the reviewed months, however facility policy is to apply the legal rate of 135% -170%</p>
<p>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.</p>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other	<p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p>
	<p>NA</p>	
	<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p>	<input type="checkbox"/> <b>Overtime is voluntary</b> <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) NA
<p>NA</p>		
<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>		<input type="checkbox"/> Yes <input type="checkbox"/> No <p>Q1: If yes, please give details:            NA</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>	<input type="checkbox"/> Yes <input type="checkbox"/> No NA

**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:**

- The Facility comply with the local Egyptian law (labour Law 12/2003) and SMETA ETI requirements regarding no discrimination on any basis.
- Through employee interview, management interview and documents review: It was noted that there is no discrimination at the company.
- The company provides the same pay to all employees
- Company has a policy against all discriminations, posted in the entrance of the production area. Workers confirmed it.
- Employees confirmed that they're all equal against company's rules and opportunities.

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

Details:

It is clearly mentioned in the company manual which includes non-discrimination policy that it is prohibited to practice any discrimination between employee also different religions, races were found working at the site and all the interviewed workers reported that there is no discrimination practices at the site were ever noted.

Any other comments:

None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: 40 % A2: Female: 60 %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	0
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 type="checkbox"/> No evidence of discrimination found C1: Please give details: NA

Professional Development	
A: What type of training and development are available for workers?	Health & safety training, Ethical awareness and technical training related to the workers specific jobs.

B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details:  NA
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Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None  <b>Local law and/or ETI requirement:</b> None  <b>Recommended corrective action:</b> None	<b>Objective evidence observed:</b> (where relevant please add photo numbers)  None

Observation:	
<b>Description of observation:</b> None <b>Local law or ETI requirement:</b> None <b>Comments:</b> None	<b>Objective evidence observed:</b> None

Good Examples observed:	
Description of Good Example (GE): None	<b>Objective Evidence Observed:</b> None

**8: Regular Employment Is Provided**

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

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

**ETI**

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

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

**Additional Elements: Responsible Recruitment**

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- The company comply with applicable requirements of labour law 12/2003 and SMETA ETI.
- Regular employment is provided to the workers as most of the workers were working at the company with valid employment contract, workers were receiving the legal benefits stated at the local labour law.
- All employees were hired directly by the company.
- All workers are covered by the social insurance.
- There is a signed labour contract kept in each employee personnel file.
- There is no subcontracting or homeworking from the site.
- No migrant workers.
- All workers are Egyptian.

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

Details:

Employment contracts – workers personal files – company policy – payroll records – social insurance records.

Any other comments:

None

Non-compliance:	
<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:                      None</p> <p><b>Local law and/or ETI requirement:</b>                      None</p> <p><b>Recommended corrective action:</b>                      None</p>	<p><b>Objective evidence observed:</b>                      (where relevant please add photo numbers)</p> <p>None</p>

Observation:	
<p><b>Description of observation:</b>                      None</p> <p><b>Local law or ETI requirement:</b>                      None</p> <p><b>Comments:</b>                      None</p>	<p><b>Objective evidence observed:</b></p> <p>None</p>

Good Examples observed:	
<p><b>Description of Good Example (GE):</b>                      None</p>	<p><b>Objective Evidence Observed:</b>                      None</p>

**Responsible Recruitment**

All Workers	
<p>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?</p>	<p><input checked="" type="checkbox"/> Terms &amp; Conditions presented  <input checked="" type="checkbox"/> Understood by workers  <input checked="" type="checkbox"/> Same as actual conditions</p> <p>A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:                      NA</p>
<p>B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>B1: If yes, please describe details and specific category(ies) of workers affected:                      NA</p>



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: NA
D: If any checked, give details:	NA

<b>Migrant Workers:</b> <i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i>			
A: Type of work undertaken by migrant workers:	NA, No migrant workers in the facility.		
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used:  B2: Total number of (outside of local country) recruitment agencies used: NA		
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?	<table border="1" style="width: 100%;"> <tr> <td style="width: 60%;"> <input type="checkbox"/> Yes  <input type="checkbox"/> No                              C1: Please describe finding:                              NA                         </td> <td style="width: 40%;">                             C2: Observations:                              NA                         </td> </tr> </table>	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: NA	C2: Observations: NA
<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: NA	C2: Observations: NA		
D: Are Any migrant workers in skilled, technical, or management roles  <i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No  D1: If yes, number and example of roles: NA, No migrant workers in the facility.		

### NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No NA, No migrant workers in the facility.
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:  NA
C: If any checked, give details:	NA

Agency Workers (if applicable)	
<i>(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.)</i>	
A: Number of agencies used (average):	A1: Names if available: NA
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No

	D1: Please give details: NA
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: NA

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

**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:**

NA, No sub-contracting & Home-working was used by this factory.

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

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

Process Subcontracted	Process 1	Process 2
Name of factory	NA	
Address	NA	

Details:

Document Review.

Site Tour.

Management interview.

Workers interview

**Non-compliance:**

**1. Description of non-compliance:**

NC against ETI/Additional Elements

NC against Local Law

NC against customer code:

None

**Local law and/or ETI /Additional Elements requirement:**

None

**Recommended corrective action:**

None

**Objective evidence observed:**

*(where relevant please add photo numbers)*

None

Observation:	
<b>Description of observation:</b> None <b>Local law or ETI/Additional elements requirement:</b> None <b>Comments:</b> None	<b>Objective evidence observed:</b> None

Good Examples observed:	
<b>Description of Good Example (GE):</b> None	<b>Objective Evidence Observed:</b> None

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: NA
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 <b>Yes</b> , summarise details: NA
C: Number of sub-contractors/agents used:	NA
D: Is there a site policy on sub-contracting?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: If <b>Yes</b> , summarise details: NA
E: What checks are in place to ensure no child labour is being used and work is safe?	NA

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 <b>Yes</b> , summarise details: NA		
B: Number of homeworkers	B1: Male: NA	B2: Female: NA	Total: NA

<p>C: Are homeworkers employed direct or through agents?</p>	<p><input type="checkbox"/> Directly  <input type="checkbox"/> Through Agents                  NA</p>	<p>C1: If through agents, number of agents:</p> <p>NA</p>
<p>D: Is there a site policy on homeworking?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No                  NA</p>	
<p>E: How does the site ensure worker hours and pay meet local laws for homeworkers?</p>	<p>NA</p>	
<p>F: What processes are carried out by homeworkers?</p>	<p>NA</p>	
<p>G: Do any contracts exist for homeworkers?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No                  G1: Please give details:                  NA</p>	
<p>H: Are full records of homeworkers available at the site?</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No                  NA</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

<p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&amp;S or any other grievances to a 3<sup>rd</sup> party?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>A1: Please give details:</p> <ul style="list-style-type: none"> <li>• suggestion box</li> <li>• directly reporting to management (Open door),</li> <li>• workers' representative.</li> <li>• There is no reporting to a third party</li> </ul>
<p>B: If <b>Yes</b>, are workers aware of these channels and have access? Please give details.</p>	<p>Worker stated their knowing of established methodologies</p>
<p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<ul style="list-style-type: none"> <li>• suggestion box</li> <li>• directly reporting to management (Open door),</li> <li>• workers' representative</li> </ul>
<p>D: Which of the following groups is there a grievance mechanism in place for?</p>	<input checked="" type="checkbox"/> Workers <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other  <p>D1: Please give details: All workers</p>
<p>E: Are there any open disputes?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  <p>E1: If yes, please give details</p>
<p>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)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  <p>F1: If no, please give details</p>
<p>G: Is there a published and transparent disciplinary procedure?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  <p>G1: If no, please explain</p>
<p>H: If yes, are workers aware of these the disciplinary procedure?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  <p>H1: If no, please give details</p>

<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>II: If yes, please give details                  As per local law.</p>
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**Current Systems and Evidence Examined**

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

**Current systems:**

- It is clearly mentioned and committed by management in the anti-harsh policy that no such practices shall be used and workers stated during the interviews that company are well treating them.
- No kind of physical abuse or corporal punishment applied in the facility.
- Workers confirmed never heard of harsh or inhumane treatment observed, on the contrary, they said they like their work and they are treated very well by the management and their supervisors.
- The interviewed workers reported that they have never witnessed any improper behaviour.
- This was also verified during the site tour.
- No such cases have been reported during the last years (confirmed during the management and the employees' interviews).

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):**  
 Details:  
 Company roles and regulations – workers interviews – supervisor's interviews, Management interview.

Any other comments:  
 None

**Non-compliance:**

<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI    <input type="checkbox"/> NC against Local Law    <input type="checkbox"/> NC against customer code:                      None</p> <p><b>Local law and/or ETI requirement:</b>                      None</p> <p><b>Recommended corrective action:</b>                      None</p>	<p><b>Objective evidence observed:</b>                      (where relevant please add photo numbers)</p> <p>None</p>
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Observation:	
<b>Description of observation:</b> None <b>Local law or ETI requirement:</b>  <b>Comments:</b> None	<b>Objective evidence observed:</b> None

Good Examples observed:	
<b>Description of Good Example (GE):</b> None	<b>Objective Evidence Observed:</b> 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:**

- NA, there is no migrant or non-local workers are working at the site

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

Details:

Document Review, site Tour, Management interview, Workers interview.

Any other comments: NA

**Non-compliance:**

**1. Description of non-compliance:**

- NC against ETI/Additional Elements       NC against Local Law  
 NC against customer code:

None

**Local law and/or ETI /Additional Elements requirement:**

None

**Recommended corrective action:**

None

**Objective evidence observed:**

(where relevant please add photo numbers)

None

**Observation:**

**Description of observation:**

None

**Local law or ETI/Additional Elements requirement:**

None

**Comments:**

None

**Objective evidence observed:**

None

**Good examples observed:**

Description of Good Example (GE):  
None

**Objective Evidence Observed:**  
None

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

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

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

the site has environmental records which were in compliance with the local requirements,

- The site had updated environment risk assessment
- The site had a sewage tank and waste contract.
- There is documentation for waste disposal.
- Waste contract on 03/03/2021 by El sadat National United, El Monofia Governate.
- The site conducted some training for all employees on the avoidance of environmental impact.
- The site established the environmental protection policy, product waste, waste water, pesticide and fertilizer usage were identified and assessed as key environmental impacts, and environmental pollution emergency plan was available for review.
- No any harmful releases from the facility.
- Mr. Ahmed Kamal: Environmental Responsible was appointed responsibility for environmental issues.
- Environmental evaluation has done on 15/03/2021 by Cairo University.

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

Details:

Environmental policy, operations outputs, Farm tour, Management interview.

Any other comments:

None

**Non-compliance:**

**1. Description of non-compliance:**

NC against ETI/Additional Elements

None

NC against Local Law

**Objective evidence observed:**

(where relevant please add photo numbers)

**Local law and/or ETI/Additional Elements requirement:**

None

None

**Recommended corrective action:**

None

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

Good examples observed:	
<b>Description of Good Example (GE):</b> None	<b>Objective Evidence Observed:</b> None

Other findings

**Other Findings Outside the Scope of the Code**

None

**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)*

None

## Appendix 1

<p><b>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."</b></p> <p><input checked="" type="checkbox"/> Not Applicable please x</p>	
<p><b>NOTE:</b> The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.</p>	<p><b>Instruction to Audit Company:</b> fill in the relevant clauses from the Customer Supplier Code - where applicable.</p>
<b>ETI Code / Additional Elements</b>	<b>Customer's Supplier Code equivalent</b>
<b>0.A. Universal Rights covering UNGP</b>	<b>0.A. Universal Rights covering UNGP</b>
<p><b>0.A. Guidance for Observations</b></p> <p>0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.</p> <p>0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights</p> <p>0.A.3 Businesses shall identify their stakeholders and salient issues.</p> <p>0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.</p> <p>0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.</p> <p>0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.</p>	
<b>0.B. Management Systems &amp; Code Implementation</b>	<b>0.B. Management Systems &amp; Code Implementation</b>
<p>0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p>	

<p>0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.</p> <p>0.3 Suppliers are expected to communicate this Code to all employees.</p> <p>0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</p>	
<p><b>ETI 1. Forced Labour</b></p>	<p><b>ETI 1. Forced Labour</b></p>
<p>1.1 There is no forced, bonded or involuntary prison labour.</p> <p>1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.</p>	
<p><b>ETI 2. Freedom of association and the right to collective bargaining are respected</b></p>	<p><b>ETI 2. Freedom of association and the right to collective bargaining are respected</b></p>
<p>2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</p> <p>2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</p> <p>2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.</p> <p>2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.</p>	
<p><b>ETI 3. Working conditions are safe and hygienic</b></p>	<p><b>ETI 3. Working conditions are safe and hygienic</b></p>
<p>3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>3.2 Workers shall receive regular and recorded Health &amp; Safety training, and such training shall be repeated for new or reassigned workers.</p> <p>3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.</p>	



<p>3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.</p> <p>3.5 The company observing the code shall assign responsibility for Health &amp; Safety to a senior management representative.</p>	
<p><b>ETI 4. Child labour shall not be used</b></p>	<p><b>ETI 4. Child labour shall not be used</b></p>
<p>4.1 There shall be no new recruitment of child labour.</p> <p>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.</p> <p>4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.</p> <p>4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.</p>	
<p><b>ETI 5. Living wages are paid</b></p>	<p><b>ETI 5. Living wages are paid</b></p>
<p>5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.</p> <p>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.</p> <p>5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.</p>	
<p><b>ETI 6. Working Hours are not excessive</b></p>	<p><b>ETI 6. Working Hours are not excessive</b></p>
<p>6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.</p> <p>6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.</p>	

<p>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.</p> <p>6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.</p> <p>6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where <b>all</b> of the following are met:</p> <ul style="list-style-type: none"> <li>- this is allowed by national law;</li> <li>- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;</li> <li>- appropriate safeguards are taken to protect the workers' health and safety; and</li> <li>- The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.</li> </ul> <p>6.6 Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.</p>	
<p><b>ETI 7. No discrimination is practised</b></p>	<p><b>ETI 7. No discrimination is practised</b></p>
<p>7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.</p>	
<p><b>ETI 8. Regular employment is provided</b></p>	<p><b>ETI 8. Regular employment is provided</b></p>
<p>8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p>8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or</p>	

<p>provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.</p> <p><b>Additional Elements: Responsible Recruitment</b>              8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.              8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.              8.5 Employment agencies must only supply workers registered with them.              8.6 Workers pay no recruitment fee at any stage of the recruitment process.              8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.</p>	
<p><b>8A: Sub-Contracting and Homeworking</b></p>	<p><b>8A: Sub-Contracting and Homeworking</b></p>
<p>8A.1 There should be no sub-contracting unless previously agreed with the main client.              8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.</p>	
<p><b>ETI 9. No harsh or inhumane treatment is allowed</b></p>	<p><b>ETI 9. No harsh or inhumane treatment is allowed</b></p>
<p>9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.              Additional elements:              9.2 companies should provide access to a confidential grievance mechanism for all workers</p>	
<p><b>10. Other Issue areas: 10A: Entitlement to Work and Immigration</b></p>	
<p><b>Additional Elements</b>              10A.1 Only workers with a legal right to work shall be employed or used by the supplier.              10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.</p>	
<p><b>10. Other issue areas 10B2: Environment 2-Pillar</b></p>	

<p>10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.          10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.  <i>Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.</i></p>	
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SMETA Extra Sections for 4 Pillar Audit:	SMETA Extra Sections for 4 Pillar Audit:
<p><b>Environment Section</b></p>	<p><b>Environment Section</b></p>
<p><b>B.4. Compliance Requirements</b>            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.  <b>B4. Guidance for Observations</b>            10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.            10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.</p>	
<p><b>Business Practices Section</b></p>	

**10C. Compliance Requirements**

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

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

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

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

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

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

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

**10C. Guidance for Observations**






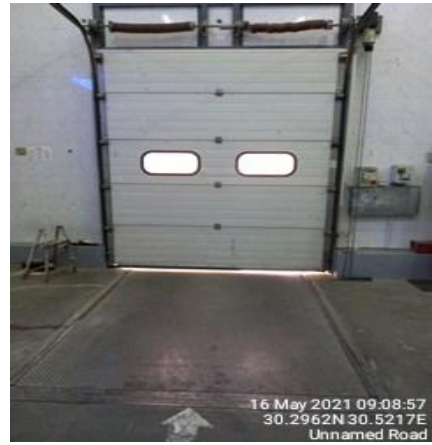
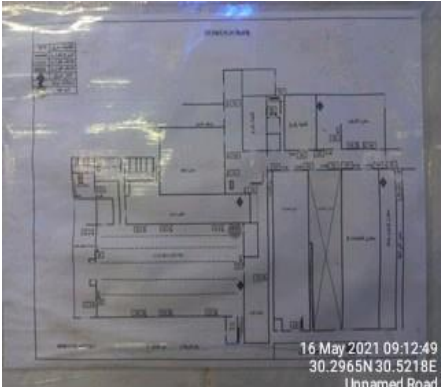


10C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.



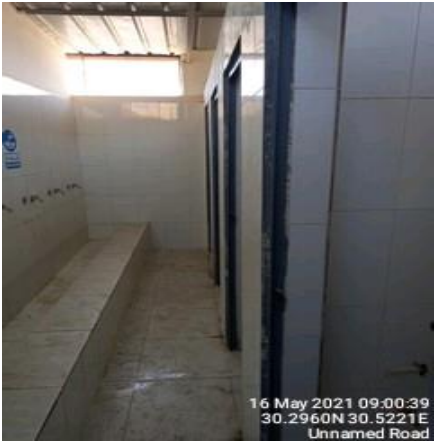






10C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented.



# Photo Form

## Facility overview:

 <p>16 May 2021 10:01:07 30.2991N 30.5251E Unnamed Road</p>	 <p>16 May 2021 10:06:22 30.2965N 30.5217E Unnamed Road</p>	 <p>16 May 2021 08:57:20 30.2687N 30.5169E Unnamed Road</p>
<p>Clean farm</p>	<p>Administration office</p>	<p>Packhouse production area</p>
 <p>16 May 2021 09:07:10 30.2963N 30.5217E Unnamed Road</p>	 <p>16 May 2021 09:09:23 30.2962N 30.5218E Unnamed Road</p>	 <p>16 May 2021 09:08:57 30.2962N 30.5217E Unnamed Road</p>
<p>Precooling</p>	<p>Cold store</p>	<p>Loading area</p>
 <p>16 May 2021 09:12:49 30.2965N 30.5218E Unnamed Road</p>	 <p>16 May 2021 10:04:29 30.2965N 30.5218E Unnamed Road</p>	 <p>16 May 2021 09:00:13 30.2961N 30.5221E Unnamed Road</p>
<p>Site layout</p>	<p>Work instruction and policy</p>	<p>Sanitation area</p>

 <p>16 May 2021 09:03:22 30.2961N 30.5220E Unnamed Road</p>	 <p>16 May 2021 09:15:19 30.2965N 30.5220E Unnamed Road</p>	 <p>16 May 2021 09:00:39 30.2960N 30.5221E Unnamed Road</p>
<p>Workers lockers</p>	<p>Packhouse gate</p>	<p>Packhouse Toilets</p>
 <p>16 May 2021 09:07:46 30.2964N 30.5217E Unnamed Road</p>	 <p>16 May 2021 09:06:12 30.2964N 30.5219E</p>	 <p>16 May 2021 09:09:44 30.2963N 30.5218E Unnamed Road</p>
<p>Packaging Material storage</p>	<p>Emergency exit</p>	<p>Light emergency exit</p>
 <p>16 May 2021 09:05:36 30.2963N 30.5219E</p>	 <p>16 May 2021 10:05:20 30.2964N 30.5218E Unnamed Road</p>	 <p>16 May 2021 10:04:34 30.2965N 30.5218E Unnamed Road</p>
<p>Sound emergency fire alarm with identification</p>	<p>Suggestion box</p>	<p>Emergency contact</p>



<p>16 May 2021 08:59:40 30.2962N 30.5222E Unnamed Road</p>	<p>16 May 2021 08:59:26 30.2962N 30.5222E Unnamed Road</p>	<p>16 May 2021 09:25:35 30.2969N 30.5210E Unnamed Road</p>
<p>Fire extinguishers certificate</p>	<p>Fire extinguishers validation</p>	<p>Fire box</p>

<p>16 May 2021 10:04:22 30.2965N 30.5219E Unnamed Road</p>	<p>16 May 2021 09:36:24 30.2991N 30.5214E Unnamed Road</p>	<p>16 May 2021 09:35:44 30.2990N 30.5213E Unnamed Road</p>
<p>Egyptian law communicated</p>	<p>Accommodation</p>	<p>Rest area</p>

<p>16 May 2021 09:36:47 30.2992N 30.5214E Unnamed Road</p>	<p>16 May 2021 09:58:00 30.3028N 30.5261E Wadi Al Netroun - Al Deblomasein Road</p>	<p>16 May 2021 10:04:14 30.2965N 30.5219E Unnamed Road</p>
<p>Toilets</p>	<p>Kitchen</p>	<p>Workers Fingerprint signature</p>





Pesticide store

Pesticide Storage facilities

Protective clothes



First aid kit in chemical storage

First aid kit in Pesticide storage

chemical storage



Hazard Sign

Chemical instruction

Flue storage



Microbial analysis



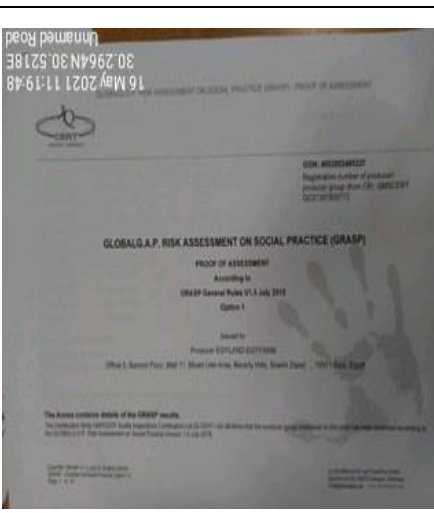
Global GAP Certificate



BRC Certificate



ISO9001:2015 Certificate

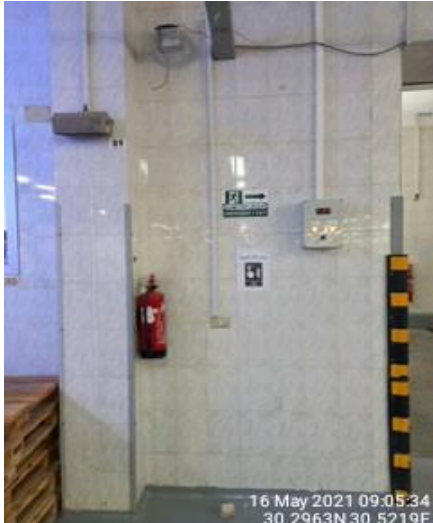






GRASP certificate



Environment report



 <p>16 May 2021 09:05:34 30.2963N 30.5219E</p>	 <p>16 May 2021 09:13:53 30.2963N 30.5219E Unnamed Road</p>	 <p>16 May 2021 09:11:41 30.2642N 30.5126E Unnamed Road</p>
<p>Evidence of there are no rubber mats were placed under the electrical control panels in the packhouse.</p>	<p>Evidence of 3 fire extinguishers in the packhouse production area are not accessible (blocked access).</p>	<p>Evidence of there are two forklift workers are not worn safety shoes.</p>
 <p>16 May 2021 09:02:47 30.2961N 30.5219E Unnamed Road</p>	 <p>16 May 2021 09:08:00 30.3028N 30.5219E Wadi Al Netroun - Al Debiomassen (Basel)</p>	
<p>Evidence of 2 fire extinguishers in the female worker rest area are incorrect height</p>	<p>Evidence of there are 2 fire extinguishers in the kitchen area were placed directly on the ground.</p>	



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

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

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

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

[http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5lw\\_3d\\_3d](http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5lw_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>