

# Sedex Members Ethical Trade Audit Report

Version 7



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# Audit content

**(1)** A SMETA audit was conducted which included some or all of labour standards, health and safety, environment and business ethics. The SMETA minimum requirements were applied and the SMETA auditor manual was followed. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA methodology are stated (with reasons for deviation) in the SMETA declaration.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the code areas below.

## 2-pillar audits include:

- Labour standards:
  - 0. Enabling accurate assessment
  - 1. Employment is freely chosen
    - 1.A. Responsible recruitment and entitlement to work
  - 2. Freedom of association and right to collective bargaining are respected
  - 4. Child labour shall not be used
  - 5. Legal wages are paid
    - 5.A. Living wages are paid
  - 6. Working hours are not excessive
  - 7. No discrimination is practiced
  - 8. Regular employment is provided
    - 8.A. Sub-contracting and homeworkers are used responsibly
  - 9. No harsh or inhumane treatment is allowed
- Health and safety:
  - 3. Working conditions are safe and hygienic
- Environment:
  - 10.A. Environment 2-pillar

## 4-pillar audits include, in addition to the above:

- Environment:
  - 10.B. Environment 4-pillar
- Business ethics:
  - 10.C. Business ethics

**(2)** Where appropriate, non-compliances or non-conformances were raised where either local law or the base code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.

**(3)** Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

# Audit details

## Site details

<b>Sedex site reference</b>	ZS1000099669	<b>Site name</b>	Cairo Food International
<b>Business name</b>	Cairo Food International	<b>Site address</b>	19 Adel Gelil st, Al Zatoun ,Cairo , Egypt 19 Adel Gelil st, Al Zatoun ,Cairo , Egypt Cairo EG 22773

## Audit details

<b>Sedex company reference</b>	ZC5000083976	<b>Auditor company name</b>	LSQA MIDDLE EAST
<b>Audit company address</b>	Flat# 405 , 1 Almansouria Road Panmorama Pyramids BLD AlHaram, Giza, EG, 12111		
<b>Date of audit</b>	2026-02-25	<b>Audit conducted by</b>	Ahmed Huss
<b>Audit pillars</b>	Labour Standards   Health and safety   Environment 4-Pillar   Business ethics		
<b>Time in and out</b>	Day 1	Day 2	
	In 09:00	In	09:00
	Out 18:00	Out	13:55
<b>Audit type</b>	Full initial		
<b>Was the audit announced?</b>	Semi announced		

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Was the Sedex SAQ available for review? Yes

Who signed and agreed CAPR? Fady Yacoub / GM

Any conflicting information SAQ/Pre-Audit Info No

Is further information available? No

### Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	No	No
B: Present at the audit?	Yes	No	No
C: Present at the closing meeting?	Yes	No	No
Reason for absence at the opening meeting	N/A, there is no union representative or worker representative at the site		
Reason for absence during the audit	N/A, there is no union representative or worker representative at the site		
Reason for absence at the closing meeting	N/A, there is no union representative or worker representative at the site		

# SMETA declaration

## Auditor team

### SMETA declaration

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

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

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

**Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)**    None

<b>Lead auditor</b>	Ahmed Huss	<b>APSCA Number</b>	21703115
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**Additional auditor**

<b>Date of declaration</b>	2026-02-26
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## Site representation


<b>Declaration</b>	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
<b>Full name</b>	Fady Yacoub
<b>Title</b>	GM
<b>Date of declaration</b>	2026-02-26


## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
2. Freedom of association and right to collective bargaining are respected	2.B Not prohibit, discourage or interfere wit...	Local law Base code	NC <a href="#">ZAF601324172</a>
3. Working conditions are safe and hygienic	3.L Implement effective processes to manage f...	Base code	NC <a href="#">ZAF601324174</a>
	3.L Implement effective processes to manage f...	Local law Base code	NC <a href="#">ZAF601324175</a>
	3.O Implement an appropriate electrical safet...	Local law Base code	NC <a href="#">ZAF601324176</a>
	3.U Ensure any additional relevant legal requ...		GE <a href="#">ZAF601324173</a>


# Management systems

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

 Not addressed

















 Fundamental improvements required


 Some improvements recommended


 Robust management systems


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

 Not addressed

 Fundamental improvements required

 Some improvements recommended

 Robust management systems

# Site details

## Company and site details

<b>Sedex company reference</b>	ZC5000083976	
<b>Sedex site reference</b>	ZS1000099669	
<b>Company name</b>	Cairo Food International	
<b>Business ownership type</b>	GOODS	
<b>Site name</b>	Cairo Food International	
<b>Site name in local language</b>	Cairo Food International	
<b>GPS location</b>	<b>GPS address</b>	K 48 - Desert Road - Al-Jalaa Village - Al-Amiriya - Alexandria
	<b>Coordinates</b>	30°53'16.1"N 29°52'36.0"E
<b>Is the worksite in a remote location, far from habitation?</b>	No	
<b>Site contact</b>	<b>Contact name</b>	Fady Yacoub
	<b>Job title</b>	General Manager
	<b>Phone number</b>	+20 1224165550
	<b>Email</b>	Fady@cairofoodintl.com

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## Company and site details

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**Applicable business and other legally  
required business license numbers and  
documents**

-Commercial record :83937  
Issue Date :10/10/2024  
Expiry Date :05 /11/2029  
-TAX card : 481713700  
Issue Date :15/09/2024  
Expiry Date :14 /09/2029  
-Export record :1004853  
Issue Date :28/07/2025  
Expiry Date :27 /07/2030

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## Site activities

<b>Site function</b>	Finished Product Supplier Pack house	
<b>Site activities</b>	<b>Primary</b>	Packaging activities
	<b>Secondary</b>	
	<b>Other</b>	
<b>Product type</b>	carrots, potatoes, garlic.	
<b>Process overview</b>	<ul style="list-style-type: none"> <li>-Packing of carrots, potatoes, garlic.</li> <li>- the total area is 5000 m2</li> <li>-the site have one production line with total capacity 50 ton / day</li> <li>-the site have</li> <li>02 Manual forklifts</li> <li>01 forklift</li> </ul>	
<b>What level of mechanization best describes the work at this site?</b>	Low mechanisation / high manual Labour	

## Site scope

<b>Is the audited site a physically continuous area?</b>	Yes
<b>What is the area of audited site to its boundary?</b>	5000m <sup>2</sup>

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## Site scope

<b>Building 1</b>	<b>Last construction works on site</b>	2025
	<b>If building is shared, provide details</b>	N/A, there are no other facilities that share the same building with the audited site.
	<b>Number of floors</b>	1
	<b>Description of floor activities</b>	Security room
<b>Building 2</b>	<b>Last construction works on site</b>	2025
	<b>If building is shared, provide details</b>	N/A, there are no other facilities that share the same building with the audited site.
	<b>Number of floors</b>	1
	<b>Description of floor activities</b>	Administrative building
<b>Building 3</b>	<b>Last construction works on site</b>	2025
	<b>If building is shared, provide details</b>	N/A, there are no other facilities that share the same building with the audited site.
	<b>Number of floors</b>	1
	<b>Description of floor activities</b>	Packing Hall and warehouse
<b>Is there any difference between the site scope of the audit and the Sedex site profile?</b>	No	
<b>Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?</b>	No	

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## Site scope

Is any activity conducted onsite not included within the scope of the audit? No

## Worker accommodation and transport

Are there any site-provided worker accommodation buildings? No

Does the site organise worker transport to the worksite? Site provided

Yes – the site organizes worker transport to the worksite. The company provides organized transportation for workers to and from the worksite. This includes scheduled buses or vans arranged by the site management to ensure timely and safe arrival of workers. The transport is coordinated to align with shift times, and vehicles used meet safety and comfort standards. This service supports worker convenience, reduces commute-related stress, and helps maintain punctuality and productivity.

## Work patterns

Approximate workers on site per month (% of peak)	January	90-100%	February	90-100%
	March	90-100%	April	90-100%
	May	90-100%	June	90-100%
	July	80-90%	August	80-90%
	September	80-90%	October	90-100%
	November	90-100%	December	90-100%

Is there any night shift work at the site? No

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## Site assessments

<p><b>Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact?</b></p>	<p>Other certification Global GAP GGN: 4056186974174 Valid to : 08/07/2026</p>
<p><b>Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community?</b></p>	<p>No -During the facility walkthrough and documents review, it was evident that the facility has not assessed for the negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community.</p>
<p><b>Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?</b></p>	<p>No During the facility walkthrough and documents review, it was evident that there is no Human Rights Impact Assessment (HRIA) had ever been conducted at the facility.</p>

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# Worker analysis

Gender disaggregated data available      Men and women

## Worker totals

	Men	Women	Other	Total
Number of workers	12 (44.4%)	15 (55.6%)	- -	27 (100%)

## Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	5 (71.4%)	2 (28.6%)	- -	7 (25.9%)
Temporary or fixed term employees	7 (35%)	13 (65%)	- -	20 (74.1%)
Agency or subcontracted workers	0 -	0 -	- -	0 (0%)
Seasonal workers	0 -	0 -	- -	0 (0%)
Self-employed workers	0 -	0 -	- -	0 (0%)
Informal workers including home workers	0 -	0 -	- -	0 (0%)
Apprentices, trainees or interns	0 -	0 -	- -	0 (0%)

\* % of total workforce

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## Migrant workers

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

\* % of total workforce

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

N.A, there is no migrant workers in the site.

## Workers by age

	Men	Women	Other	Total
18 - 24 years old	2 (40%)	3 (60%)	- -	5 (18.5%)
15 - 17 years old	0 -	0 -	- -	0 (0%)
Under 15 years old	0 -	0 -	- -	0 (0%)

\* % of total workforce

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

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

### Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Egyptian	44%	56%	-	100%

### Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 -	0 -	- -	0 (0%)
Workers paid based on a mix of 'piece work' and hourly rate	0 -	0 -	- -	0 (0%)
Workers paid hourly / daily rate	0 -	0 -	- -	0 (0%)
Salaried workers	12 (44.4%)	15 (55.6%)	- -	27 (100%)

\* % of total workforce

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## Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 -	0 -	- -	0 (0%)
Paid weekly	0 -	0 -	- -	0 (0%)
Paid monthly	12 (44.4%)	15 (55.6%)	- -	27 (100%)
Other	0 -	0 -	- -	0 (0%)

\* % of total workforce

If other payment cycle entered, please provide details      None

## People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	1 (50%)	1 (50%)	- -	2
Supervisors or team leaders	1 (50%)	1 (50%)	- -	2
Administrative staff	2 (100%)	0 (0%)	- -	2

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# Worker interview summary

Gender disaggregated data available      Men and women

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

## Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?

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

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

Number and size of group interviews      1 Group X 4 Workers.

Did workers understand the purpose of the audit?      Yes

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

Was there any indication that workers had been 'coached' in how they should respond to questions?

No

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

Favorable

### Attitude of workers

In which areas did workers raise significant concerns or complaints?

Other (provide details)

There were no complaints raised by the interviewed workers.

What did the workers like the most about working at this site?

Equal opportunities  
Grievance mechanisms  
Transport

Additional comments

These advantages are according to the Workers interview

Attitude of workers' committee/union representatives

N/A, there is no worker representative in the firm

Attitude of managers

The site management was found to be cooperative throughout the audit and had a positive attitude towards the Lead Auditor

### Workers interviewed by type

	Total
Permanent workers	5
Temporary or fixed-term employees	5
Agency or subcontracted workers	0

## Workers interviewed by type

Seasonal workers	0
Other workers	0
<b>Total number of workers interviewed</b>	<b>10</b>

## Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	2	2	-	4
Workers interviewed individually	3	3	-	6

## Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	0	0	-	0
International migrant workers interviewed	0	0	-	0
<b>Total migrant workers interviewed</b>	<b>0</b>	<b>0</b>	<b>-</b>	<b>0</b>

# Measuring workplace impact

Gender disaggregated data available      Men and women

## Annual worker turnover (%)\*

	Men	Women	Other	Total
Last full quarter (90 days)	1.0%	1.0%	-	2.0%
Last full calendar year (2025)	1.0%	0.0%	-	1.0%
Previous full calendar year (2024)	1.0%	0.0%	-	1.0%

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

## Rate of absenteeism (%)\*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%
Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

Number of days lost through job absence in the year, calculated as:  $(\text{Number of days lost through job absence in the year}) / [(\text{Number of employees on 1st day of the year} + \text{Number of employees on the last day of the year}) / 2] * (\text{Number of available workdays in the year})$ .

**Are accidents recorded?**

Yes

- Accidents and injury record dated 18/1/2026 was reviewed during the documents review and it was formal one which is delivered to the legal social insurance office, and stating that there are no injuries at the site.

- As per the Egyptian labor law article: 270 The establishment is required to provide first aid equipment for its workers.

If the number of workers in a single location or country, or within a 15-kilometer radius, exceeds

fifty workers, the establishment must employ one or more qualified nurses to perform nursing or

first aid duties during each work shift. Additionally, the establishment must assign a doctor to

treat workers at a designated clinic within the premises and provide necessary medicines free of

charge.

If a worker is treated in a government or charitable hospital as mentioned in the first and second

paragraphs of this article, the establishment is obliged to cover the costs of treatment,

medication, and accommodation at the hospital.

The procedures for determining the costs of treatment, medication, and accommodation

mentioned in the previous paragraphs will be determined by a decision issued by the competent

minister in coordination with the minister responsible for health matters.

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

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%
Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

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

### Lost day work cases (per 100 workers)\*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%
Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

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

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

	Men	Women	Other	Total
Last full quarter (90 days)	1.0%	0.0%	-	1.0%
Last full calendar year (2025)	1.0%	0.0%	-	2.0%

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

Previous full calendar year (2024)	2.0%	0.0%	-	2.0%
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### Percentage of workers that work on average more than 60 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%
Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

# 0. Enabling accurate assessment

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings
<b>Systems and evidence examined to validate this code section</b>			<p>1. Audit process consisted of a facility site tour , covering all operative and non-operative areas, confidential interviews, and document review. The company provided full access to all areas, as well as all requested documents were provided for review. Interviews were conducted in accordance with best practices requirements and in a confidential manner. No bribery attempt.</p> <p>2. The evidence examined during the audit:</p> <ul style="list-style-type: none"> <li>a. Business Licenses.</li> <li>b. HR Policies.</li> <li>c. Management interview.</li> <li>d. Workers interviews (10 workers).</li> <li>e. Training records.</li> </ul>

## 0. Enabling accurate assessment

### Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment? No

Did any workers selected by the auditor decline to be interviewed? No

Were any external stakeholders such as consultants, customer representatives, industry experts etc. present during the audit? No

# 1. Employment is freely chosen

## Management systems

**Develop and maintain relevant policies and procedures to ensure workplace requirements are met**      Some Improvements Recommended

**Appoint a manager with sufficient seniority who is responsible for implementing procedures**      Some Improvements Recommended

**Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures**      Some Improvements Recommended

**Monitor the effectiveness of procedures to meet policy and workplace requirements**      Some Improvements Recommended

## Management systems

### Explanation for management systems grades

1. Establish and maintain relevant policies and procedures to ensure workplace requirements are met

Assessment: The company has developed a solid framework of policies covering workplace requirements, including self-employment and voluntary work. These policies are implemented across operations and reviewed periodically.

Improvement Opportunity: Further enhancement could include updating policies more frequently to align with evolving labor rights standards and ensuring greater clarity in certain procedures, thereby strengthening overall compliance.

2. Appoint a manager with sufficient seniority to be responsible for implementing procedures

Assessment: Accountability for labor practices is embedded within management responsibilities, with designated staff overseeing the implementation of workplace policies.

Improvement Opportunity: Assigning a senior manager with direct authority can provide additional assurance of consistent oversight and reinforce the company's commitment to ethical labor practices.

3. Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

Assessment: The company conducts communication and awareness sessions on workplace policies, ensuring employees are informed about their rights and responsibilities.

Improvement Opportunity: Expanding training frequency and tailoring content for different levels of staff (workers, supervisors, managers) can further enhance awareness and reinforce voluntary work principles, minimizing risks of misinterpretation.

4. Monitoring the effectiveness of procedures to meet policy and work environment requirements

Assessment: The company has established monitoring mechanisms to ensure compliance with workplace requirements. Internal audits and reviews are carried out to check policy effectiveness.

Improvement Opportunity: Incorporating more structured evaluations and feedback loops will strengthen monitoring, ensuring that existing procedures remain effective and continuously improved to prevent any potential non-compliance.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings
<b>Systems and evidence examined to validate this code section</b>			<p>1. The facility is committed to comply with applicable legislation and policies of the company. During the facility tour, and the employee's interviews were no evidence of forced, bonded or involuntary labor.</p> <p>2. Employees are not required to deposit their ID's with their employer and are free to leave their employer after reasonable notice.</p> <p>3. During performed interviews, employees were favorable towards the company and it was confirmed during management and employee interviews.</p> <p>4. Policy of freely chosen and employment procedure updated on 11/1/2026 were reviewed.</p> <p>5. Work contracts were reviewed for all workers to ensure noticed periods; each worker receives a copy of signed contract by both parties.</p> <p>6. Personal files were reviewed for workers to review the workers hiring documents (copy of birth certificate, copy of ID cards, copy of signed contract).</p> <p>7. Worker's interview showed that overtime applied at this site is complying with the legal requirements.</p> <p>8. The evidence examined during the audit:</p> <ul style="list-style-type: none"> <li>- Management interview.</li> <li>- Employees interviews.</li> <li>- Employees files</li> <li>- Site tour.</li> </ul>

1. Employment is freely chosen

## Data points

If required under local law, is there a published 'modern slavery' or similar statement? Not Applicable

Does the site utilise any workers who are prisoners? No

Does the site use the labour of persons required to work under any government scheme? No

# 1.A. Responsible recruitment and entitlement to work

## Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
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Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
--	-------------------------------

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
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Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
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## Management systems

### Explanation for management systems grades

1. Establish and maintain appropriate policies and procedures to ensure workplace requirements are met

Assessment: The company has developed policies related to responsible recruitment and ensures that employees are recruited in line with legal and ethical standards.

These policies are reviewed periodically and implemented across operations.

Improvement Opportunity: To further strengthen compliance, policies can be expanded to provide more comprehensive coverage of all aspects of responsible recruitment. This includes ensuring that employees receive clear and accessible information on their rights and terms of employment before hiring, and verifying that recruitment is always free from coercion or deception.

2. Appoint a manager with sufficient seniority to be responsible for implementing the procedures

Assessment: Oversight of recruitment processes is established, and accountability is embedded within management responsibilities.

Improvement Opportunity: Assigning a senior manager with clear authority to oversee responsible recruitment will reinforce leadership commitment and ensure consistent implementation of fair and transparent recruitment practices across the organization.

3. Communicate and train employees and other personnel, including managers and supervisors, on relevant policies and procedures

Assessment: The company provides communication and awareness sessions on workplace practices, ensuring employees understand the basics of responsible recruitment.

Improvement Opportunity: Increasing the frequency and scope of training—especially tailored sessions for managers, supervisors, and staff involved in recruitment—will enhance awareness of ethical recruitment standards and responsibilities, while reducing risks of unintentional non-compliance.

4. Monitor the effectiveness of procedures to meet policy and work environment requirements

Assessment: Monitoring systems are in place to track compliance with recruitment policies and workplace standards. Internal reviews are carried out to verify proper implementation.

Improvement Opportunity: Strengthening monitoring and evaluation mechanisms, including structured audits and feedback channels, will help measure the

## Management systems

effectiveness of existing procedures, ensuring that recruitment remains fair, transparent, and fully compliant with legal and ethical standards.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings
<b>Systems and evidence examined to validate this code section</b>			<ol style="list-style-type: none"> <li>1. The Commercial Code of Conduct Policy (11-1-2026) includes the company commitment to comply with local law. The General Procedure for selection and hiring of jobs (11-1-2026) states the hiring and termination procedure and worker induction which includes the communication of policies and procedures.</li> <li>2. The company does not use agencies nor recruitment partners, all workers are hired directly by the company.</li> <li>3. During documents review, management interview and workers' interview there were all Egyptian and no migrant workers were observed in the site during the audit.</li> <li>4. During the documents review, it was evident that the site has analyzed the recruitment fees and related costs defined by the local law. The workers don't pay any fees for the recruitment and the facility is responsible for any recruitment fees.</li> <li>5. There is a Human Resources department, and a responsible HR manager.</li> <li>6. The evidence examined during the audit: <ul style="list-style-type: none"> <li>- Document review.</li> <li>- Employees interviews.</li> <li>- Management interviews.</li> <li>- Employees files.</li> <li>- Pay slips.</li> </ul> </li> </ol>

## 1.A. Responsible recruitment and entitlement to work

### Data points

#### Labour hire

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

#### Migrant workers

Do any workers migrate across international borders to work at this site?	No
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[← Code area 1.A](#)

[Code area 2 →](#)

Percentage of workers that are migrant 0%

Do any workers migrate from other states, provinces or regions within the country to work at this site? No

## Recruitment fees

Have any workers who started at this site in the last 12 months (new workers) paid any recruitment fees or associated costs, such as visas or travel, which have not been fully repaid? No - there are no new workers

[← Code area 1.A](#)

[Code area 2 →](#)

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

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required

## Management systems

### Explanation for management systems grades

1. Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met

Assessment: The company has policies regarding freedom of association and collective bargaining, demonstrating recognition of these fundamental workplace rights.

Improvement Opportunity: To further align with best practices, policies can be expanded and regularly updated to provide more detailed and transparent guidance. Clearer procedures will help ensure consistent implementation and strengthen the protection of workers' rights across all levels of the organization.

2. Appoint a competent HR Manager with sufficient seniority who is responsible for implementing procedures

Assessment: An HR Manager is already in place, with responsibility for overseeing labor-related procedures.

Improvement Opportunity: Strengthening the role by ensuring the HR Manager has sufficient competence, authority, and seniority will enhance accountability and improve consistent enforcement of policies on freedom of association and collective bargaining. This will reinforce management's commitment and build trust among employees.

3. Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

Assessment: Communication of workplace rights is ongoing, and employees are provided with general information regarding policies.

Improvement Opportunity: Expanding communication efforts and introducing structured, regular training—especially for supervisors and managers—will raise awareness and ensure all employees fully understand their rights and responsibilities regarding freedom of association and collective bargaining.

4. Monitor the effectiveness of procedures to meet policy and Workplace Requirements

Assessment: Monitoring mechanisms exist to evaluate compliance with workplace requirements.

Improvement Opportunity: Enhancing monitoring through systematic evaluations, periodic reviews, and feedback from workers will provide stronger assurance that policies are effective in practice. This will support continuous improvement and

## Management systems

ensure alignment with both internal standards and external requirements.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
2. Freedom of association and right to collective bargaining are respected	2.B Not prohibit, discourage or interfere wit...	Local law Base code	NC <a href="#">ZAF601324172</a>

### Systems and evidence examined to validate this code section

The company does not have workers' representatives or unions, but the company operates with an open door policy and does not mind establishing any workers' or union elections and has a strong system.

Evidence examined:

- The written complaints policy and the open door policy dated 11/1/2026 were reviewed.
- During the workers' interview, they stated that they had a positive attitude towards the company and did not file any complaints.
- Management interview.
- Site tour
- Employee interviews
- Management interviews
- Grievances and suggestions boxes.

# Findings: non-compliances

ZAF601324172

Non-compliance

Due 2026-04-02

## Code area

2 Freedom of association and right to collective bargaining are respected

## Status

Open\*

## Workplace requirement

2.B Not prohibit, discourage or interfere with workers' rights to join a trade union of their own choosing or other form of worker representation, including worker committees or similar arrangements where the right to freedom of association is restricted under law. This should include the fair and free selection and election of representatives, and their rights to engage in collective bargaining.

## Time given to resolve

30 days

## Verification method

Desktop audit

## Issue title

129 - Worker/union representatives are not freely elected (e.g. they are assigned by management)

## Area of non-compliance/non-conformance

Local law

Base code

## Description

During the workers' interview, management interview and documents review, it was evident that there were no worker's representative elected in the facility.

## Corrective and preventative actions

It is recommended that the facility shall hold workers' representative elections in the next month and ensure the participation of the workers.

## Local law reference

In accordance to Egyptian Labor Law # 12/2003, Article (192) In establishments employing fifty or more workers, a committee shall be established comprising representatives of the workers and the employer, to discuss matters related to organizing work, improving working conditions, and developing social relations between the two parties in the production process.

\* PDF generated at 03:14 (UTC) on 03 Mar 2026. [View this finding on the Sedex platform](#) for live updates and closure details.

[← Code area 2](#)

[Code area 3 →](#)

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

### Data points

Are trade unions allowed by law in the national context?	Yes
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	Not Applicable
Are there alternative worker representative bodies in place?	None
Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	Not Applicable
Are the worker representatives freely elected by the workforce as a whole?	Not Applicable
Does union/worker committee membership reflect the gender composition of the workforce?	Not Applicable
Does the membership reflect the nationality composition of the workforce?	Not Applicable

[← Code area 2](#)

[Code area 3 →](#)

Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years? No

### 3. Working conditions are safe and hygienic

#### Management systems

**Develop and maintain relevant policies and procedures to ensure workplace requirements are met**      Some Improvements Recommended

**Appoint a manager with sufficient seniority who is responsible for implementing procedures**      Some Improvements Recommended

**Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures**      Fundamental Improvements Required

**Monitor the effectiveness of procedures to meet policy and workplace requirements**      Fundamental Improvements Required

## Management systems

### Explanation for management systems grades

1. Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met

Assessment: The company has established policies for workplace safety and hygiene, showing commitment to maintaining a safe work environment.

Improvement Opportunity: To further align with workplace requirements, policies can be expanded, clarified, and updated more regularly to address specific risks and ensure compliance with current safety standards. Strengthening the level of detail in procedures will help maintain consistency and reinforce a safe and hygienic environment.

2. Appoint a competent Safety and Hygiene Manager with sufficient seniority who is responsible for implementing procedures

Assessment: A Safety and Hygiene Manager is already in place and responsible for overseeing compliance with safety and hygiene requirements.

Improvement Opportunity: Providing additional authority, competence-building, and clearer responsibilities will enable the manager to apply policies more effectively across all departments. This adjustment will enhance accountability, ensure consistent enforcement, and support stronger oversight of safety practices.

3. Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

Assessment: Training and communication on safety and hygiene are already being conducted.

Improvement Opportunity: Based on findings in the workplace, training can be improved by increasing its frequency, including all staff levels, and focusing more on practical aspects such as correct equipment use and hygiene practices. Enhancing these sessions will build a stronger safety culture and ensure all employees are fully aware of their responsibilities.

4. Monitor the effectiveness of procedures to meet policy and Workplace Requirements

Assessment: Monitoring systems are in place to oversee safety and hygiene compliance.

Improvement Opportunity: According to workplace findings, monitoring can be strengthened through more systematic evaluations and regular follow-ups. This will ensure existing practices are effective, highlight areas for improvement, and support

## Management systems

continuous compliance with workplace requirements.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
<b>3. Working conditions are safe and hygienic</b>	3.L Implement effective processes to manage f...	Base code	NC <a href="#">ZAF601324174</a>
	3.L Implement effective processes to manage f...	Local law Base code	NC <a href="#">ZAF601324175</a>
	3.O Implement an appropriate electrical safet...	Local law Base code	NC <a href="#">ZAF601324176</a>
	3.U Ensure any additional relevant legal requ...		GE <a href="#">ZAF601324173</a>

[← Code area 2](#)

[Code area 4 →](#)

**Systems and evidence examined to validate this code section**

- The facility uses chemicals products for production, maintenance and cleaning. The chemicals are correctly stored , MSDS are available in the storage area
  - All electrical panels are properly identified.
  - Ventilation, temperature and lighting were adequate for the production processes.
  - The facility conducts evacuation drill every year. Last evacuation drill was performed on 11-1-2026 and the Last Risk Assessment in 11-1-2026.
  - Machines are regularly maintained and operated in a safe manner. All machinery has the necessary protections and signaling to avoid accidents.
- Evidence examined:
- site tour
  - Policy (11-1-2026)
  - H&S Procedures
  - Management and employees interviews
  - Training records EX
  - Fire Fighting (15/11/2025)
  - ETI (17/11/2025)
  - first aid (19/11/2025)
  - Health and safety (18/11/2025)
  - Haygen (16/11/2025)
  - Handling of chemicals (20/11/2025)

# Findings: non-compliances

ZAF601324174

Non-compliance

Due 2026-04-02

**Code area**

3 Working conditions are safe and hygienic

**Status**

Open\*

**Workplace requirement**

3.L Implement effective processes to manage fire safety including, but not limited to, accessible evacuation routes, a fire detection system, fire fighting/suppression equipment, training and regular drills covering all shifts and warning systems.

**Time given to resolve**

30 days

**Verification method**

Desktop audit

**Issue title**

182 - Smoking occurs in prohibited/restricted areas including unrestricted smoking anywhere on site

**Area of non-compliance/non-conformance**

Base code

**Description**

During the site tour it was Evident That The Smoking Area Was Not Marked

**Corrective and preventative actions**

The site recommends to Mark The Smoking Area

\* PDF generated at 03:14 (UTC) on 03 Mar 2026. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF601324175

Non-compliance

Due 2026-04-02

**Code area**

3 Working conditions are safe and hygienic

**Status**

Open\*

[← Code area 3](#)

[Code area 4 →](#)

**Workplace requirement**

3.L Implement effective processes to manage fire safety including, but not limited to, accessible evacuation routes, a fire detection system, fire fighting/suppression equipment, training and regular drills covering all shifts and warning systems.

**Time given to resolve**

30 days

**Verification method**

Desktop audit

**Issue title**

173 - Fire risk assessment not conducted

**Area of non-compliance/non-conformance**

Local law

**Description**

during the Documents review It was evident that The risk assessment not include Fire risks on the 12/1/2026

Base code

**Corrective and preventative actions**

The Risk assessment should include All possible Risks

### Local law reference

In accordance to Egyptian Labor Law # 14/2025, article :253 Article 253: The establishment and its branches shall be obligated to conduct risk assessments and analyses of potential industrial and natural disasters, as well as disasters resulting from operations. They must also prepare emergency plans to protect the establishment, workers, and visitors in the event of accidents and disasters. These plans must be tested for effectiveness through practical drills to ensure their efficiency, with workers trained accordingly and necessary corrections made if required. The establishment may seek guidance from a consulting expert or advisory centers specializing in occupational safety and health and securing the work environment when preparing emergency plans. Additionally, the establishment must notify the competent administrative authority of its emergency plans, any amendments made to them, and in cases where hazardous materials are stored or used. If a potential incident or hazard is anticipated in the workplace that may pose an imminent and serious threat to the health or lives of workers, the worker may leave the workplace for a safe location within or outside the establishment or worksite if necessary, without prior permission. Workers must inform their direct supervisor of any hazards they are exposed to. No disciplinary consequences or liabilities shall arise from such withdrawal. The establishment is obligated to ensure that workers do not return to an unsafe working environment until the hazard has been removed. If the establishment fails to implement the obligations stipulated in this article and its implementing decisions within the deadlines set by the competent administrative authority, and this results in an imminent danger to the health or safety of workers or visitors, the competent administrative authority shall order the full or partial closure of the establishment or the suspension of one or more machines or equipment until the hazard is removed. The closure or suspension decision shall be enforced administratively without prejudice to the workers' right to receive their wages during the period of full or partial closure or suspension. The competent administrative authority may remove the cause of the hazard by direct enforcement at the expense of the establishment, in coordination with the concerned entities.

\* PDF generated at 03:14 (UTC) on 03 Mar 2026. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF601324176

Non-compliance

Due 2026-04-02

#### Code area

3 Working conditions are safe and hygienic

#### Status

Open\*

[← Code area 3](#)

[Code area 4 →](#)

**Workplace requirement**

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

**Time given to resolve**

30 days

**Issue title**

228 - Unsafe handling of electrical equipment e.g. no rubber mats in front of electricity panels

**Verification method**

Desktop audit

**Description**

It was evident during the site tour that one electrical panel was Not provided by rubber mat in the Production hall

**Area of non-compliance/non-conformance**

Local law

Base code

**Corrective and preventative actions**

The site is recommended to provide a rubber mat for all electrical panels.

**Local law reference**

In accordance to Egyptian Labor Law # 14/2025, Article 247: The establishment and its branches are required to take the necessary precautions and measures to provide occupational safety and health means and ensure a safe work environment, ensuring the prevention of engineering hazards (mechanical - electrical - construction and building - ergonomics), particularly the following: • Any hazard arising from lifting and hauling equipment, means of transportation, handling, and motion transfer. • Any hazard arising from construction, building works, excavation, risks of collapse, and falling. • Any hazard arising from electricity (both dynamic and static). • Any hazard arising from failure to consider the compatibility between the worker's physical structure, equipment, machinery, and the workplace environment.

**Evidence**



[one electrical panel was Not provided by rubber mat in the Production hall.jpg](#)



[← Code area 3](#)

[Code area 4 →](#)

\* PDF generated at 03:14 (UTC) on 03 Mar 2026. [View this finding on the Sedex platform](#) for live updates and closure details.

[← Code area 3](#)

[Code area 4 →](#)

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Audit company:  
**LSQA MIDDLE EAST**

Audit reference:  
**ZAA600184440**

Start Date:  
**2026-02-25**

End Date:  
**2026-02-26**

# Findings: good examples

ZAF601324173

Good example

## Code area

3 Working conditions are safe and hygienic

## Workplace requirement

3.U Ensure any additional relevant legal requirements concerning health & safety are met.

## Description

During the documents review and management interview, it was evident that the facility is Global Gap certified

## Evidence



[GG.pdf](#)



[← Code area 3](#)

[Code area 4 →](#)

### 3. Working conditions are safe and hygienic

## Data points

<p>Is someone within the company responsible for health and safety?</p>	<p>Yes, senior manager or business owner Yes, qualified safety officer</p>
<p>Do workers operate high risk or heavy machinery or vehicles as part of their jobs?</p>	<p>Yes</p>
<p>Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?</p>	<p>Yes</p> <ul style="list-style-type: none"> <li>- The facility uses chemicals products for production, maintenance and cleaning. The chemicals are correctly stored in a segregated area and the eyes wash facility is placed.</li> <li>- Chemical products: detergent, alcohol, sodium hypochlorite, fungicide, wax, peracetic acid, glycol, ammonia, greases, lubricants, etc..</li> </ul>
<p>Who organises accommodation for workers?</p>	<p>Workers independently arrange their own accommodation</p>
<p>Who organises worker transportation between accommodation and worksite?</p>	<p>Site owned transport</p>
<p>Who organises worker transportation while at work?</p>	<p>Site owned transport</p>
<p>Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?</p>	<p>No</p> <p>During the site tour, it was evident that there is no structural additions has been made to the original.</p>
<p>Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?</p>	<p>No</p>

[← Code area 3](#)

[Code area 4 →](#)

Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally? No

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Does the site have a structural engineer evaluation? No

[← Code area 3](#)

[Code area 4 →](#)

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## 4. Child labour shall not be used

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
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Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
--	-------------------------------

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
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Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
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## Management systems

### Explanation for management systems grades

1. Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met

Assessment: The company has established policies to prevent child labor, reflecting a strong commitment to ethical practices.

Improvement Opportunity: To further align with the latest regulations and best practices, these policies can be strengthened by adding more detail and clarity. Expanding the scope to explicitly cover all areas of the supply chain, including recruitment and third-party contractors, will ensure even greater consistency and compliance.

2. Appoint a manager with sufficient seniority who is responsible for implementing procedures

Assessment: Responsibility for child labor prevention policies currently exists within the management structure.

Improvement Opportunity: Assigning a senior manager with enhanced authority and clearly defined responsibilities will reinforce accountability and ensure consistent application of these policies across the organization. This adjustment will help strengthen oversight and provide additional assurance of effective implementation.

3. Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

Assessment: The company provides communication and training on child labor prevention.

Improvement Opportunity: Increasing the frequency and depth of training sessions, and ensuring they reach all employees—including managers and supervisors—will further raise awareness of the company’s zero-tolerance stance on child labor. This enhancement will build stronger understanding and commitment across all levels.

4. Monitor the effectiveness of procedures to meet policy and Workplace Requirements

Assessment: Monitoring systems for child labor prevention are in place.

Improvement Opportunity: More systematic and regular evaluations can improve the effectiveness of these monitoring systems. Strengthening follow-up measures will ensure that policies are consistently enforced and that prevention mechanisms remain effective.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings
<b>Systems and evidence examined to validate this code section</b>	<p>1. The Child Labor Policy #CQ-2026-1 has been updated on 11/1/2026. It's reviewed during the audit and it was in compliance with the local law and code area requirements.</p> <p>2. The site has checked workers original national ID cards at the time of interviewing and kept a copy in their personal files. During the audit it was noted that the age of the youngest worker is 24 years old and there were no concerns regarding child labor observed.</p> <p>3. The evidence examined during the audit:</p> <ul style="list-style-type: none"> <li>- Personal files and age proof verification documents: Copy of birth certificate, Recent photo, Criminal Record, Educational certificate and Copy of National ID cards).</li> <li>- Training Records.</li> <li>- Management interviews.</li> <li>- Workers interviews.</li> <li>- The Document reference: Policy #CW-2026-1 was signed, acknowledged from HR and relevant departments.</li> <li>- Child Labor Policy (Dated 11/1/2026) #CQ-2026-1. training attendance records, monitoring reports, and compliance audits.</li> <li>- Hiring Procedure.</li> <li>- Management team structure and roles.</li> <li>- Interview transcripts, notes, and recordings.</li> <li>- Copies of signed contracts, reviewed clauses, and legal compliance checks.</li> <li>- Application Form.</li> <li>- Child labor remediation plan.</li> </ul>		

4. Child labour shall not be used

## Data points

Percentage of workers that are age 24 or younger

Enter the legal age of employment 18

Enter the age of the youngest worker identified 24

Enter the number of workers under local legal minimum age 0

Enter the number of workers under 15 years old

Percentage of workers that are apprentices, trainees or interns

Were there children present on the work floor but not working at the time of audit? No

Do children live at the accommodation provided to workers? Not Applicable

[← Code area 4](#)

[Code area 5 →](#)

## 5. Legal wages are paid

### Management systems

**Develop and maintain relevant policies and procedures to ensure workplace requirements are met**      Some Improvements Recommended

**Appoint a manager with sufficient seniority who is responsible for implementing procedures**      Some Improvements Recommended

**Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures**      Some Improvements Recommended

**Monitor the effectiveness of procedures to meet policy and workplace requirements**      Some Improvements Recommended

## Management systems

### Explanation for management systems grades

1. Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met

Assessment: The company has policies in place regarding wage payments, showing a clear commitment to legal compliance.

Improvement Opportunity: To strengthen this framework, the policies can be made more comprehensive and updated more regularly to reflect changes in labor laws. Adding clearer procedures for verifying compliance with minimum wage, overtime, and benefits will further enhance alignment with regulatory requirements.

2. Appoint a competent Wage Payment Manager with sufficient seniority who is responsible for implementing procedures

Assessment: A Wage Payment Manager is currently in place and responsible for wage processes.

Improvement Opportunity: Assigning or developing a senior manager with greater authority and enhanced expertise will improve consistency and accountability. This will help ensure that wage payment policies are implemented effectively across the organization and that compliance is maintained at all times.

3. Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

Assessment: Communication and training regarding wage payments are provided but not yet fully consistent.

Improvement Opportunity: Increasing the frequency and depth of training sessions for employees, managers, and supervisors will raise awareness of wage policies and responsibilities. This will ensure that all staff clearly understand wage regulations and their role in guaranteeing accurate and lawful payments.

4. Monitor the effectiveness of procedures to meet policy and Workplace Requirements

Assessment: Wage-related monitoring systems exist but require strengthening to maximize effectiveness.

Improvement Opportunity: Conducting more systematic and regular reviews will ensure ongoing compliance with wage laws, timely detection of discrepancies, and continuous improvement in wage payment practices.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings
<b>Systems and evidence examined to validate this code section</b>			<p>1. The policy #CE-2026-1 and procedures updated on 11/1/2026. were reviewed.</p> <p>2. The site paid for overtime premiums as per the legal requirements as the following:</p> <ul style="list-style-type: none"> <li>a.135% of the basic wages for daylight overtime hours.</li> <li>b.170% of the basic wages for night overtime hours.</li> <li>c. 200% of the basic wages for overtime hours on rest days.</li> <li>d. 300% of the basic wages for overtime hours on holidays.</li> </ul> <p>3. The site pays sick leave, maternity leave and annual leave. During the audit, it was noted that there is no illegal or unauthorized deduction, and the facility complies with legal requirements for wages and benefits.</p> <p>4. The facility has designate HR Manager to be responsible person for implementing the procedure.</p> <p>5. The evidence examined during the audit:</p> <ul style="list-style-type: none"> <li>- Payroll records of 10 sampled workers for January 2026 (Recent), December 2025 (Random ) and November 2025(Peak) were reviewed during the audit.</li> <li>- Deduction and Incentive records.</li> <li>- Signed pay slips, bank transfer records, and cross-check with attendance logs.</li> <li>- Overtime and leave records.</li> <li>- Performance appraisal reports.</li> <li>- Management Interview.</li> <li>- Workers interview.</li> <li>- Training records.</li> </ul>

## 5. Legal wages are paid

### Data points

**What is the basic wage paid to workers?** Wages meet a living wage  
The legal minimum wage

**Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?** Only digital payments

**How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?** Between 1 and 10%

**Where the site has undertaken a Living Wage gap analysis against a credible Benchmark which Benchmark have they used?** Full-Fledged Anker Methodology

### Worker remuneration

**Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers?** Life insurance  
Health care  
Parental leave

### Summary information

**Is legal wage/legally recognised CBAs data available for any of these options?** Monthly

**Is actual wage data available on site for any of these options?** Monthly

[← Code area 5](#)

[Code area 5.A →](#)

<b>Maximum legal working hours</b>	<b>Max hours per day</b>	8.0
	<b>Max hours per week</b>	48.0
	<b>Max hours per month</b>	192.0
<b>Actual required working hours</b>	<b>Required hours per day</b>	8.0
	<b>Required hours per week</b>	48.0
	<b>Required hours per month</b>	192.0
<b>Maximum legal overtime hours</b>	<b>Max hours per day</b>	2.0
	<b>Max hours per week</b>	12.0
	<b>Max hours per month</b>	48.0
<b>Actual overtime hours</b>	<b>Max hours per day</b>	2.0
	<b>Max hours per week</b>	10.0
	<b>Max hours per month</b>	29.0
<b>Minimum legal wage</b>	<b>Min per hour</b>	Non applicable
	<b>Min per day</b>	Non applicable
	<b>Min per week</b>	Non applicable
	<b>Min per month</b>	7000.0
<b>Actual minimum wage</b>	<b>Actual per hour</b>	Non applicable
	<b>Actual per day</b>	Non applicable
	<b>Actual per week</b>	Non applicable
	<b>Actual per month</b>	7100.0

<b>Minimum legal overtime wage</b>	<b>Min per hour</b>	44.0
	<b>Min per day</b>	Non applicable
	<b>Min per week</b>	Non applicable
	<b>Min per month</b>	Non applicable

<b>Actual minimum overtime wage</b>	<b>Actual per hour</b>	44.0
	<b>Actual per day</b>	Non applicable
	<b>Actual per week</b>	Non applicable
	<b>Actual per month</b>	Non applicable

## Wage analysis

**Number of workers' records checked** 10

**Provide the date and details of the records**

Attendance records and payroll records for 10 sampled workers for January 2026 (Recent).

Attendance records and payroll records for 10 sampled workers for December 2025 (Random ).

Attendance records and payroll records for 10 sampled workers for November 2025 (Peak) were reviewed during the audit.

**Are there different legal minimum/legally recognised CBAs wage grades?** No

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

**Indicate the breakdown of workforce per earnings** 100 % of workforce earning above the minimum legal wage.

Are there any bonus schemes used? No

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Were accurate records shown at the first request? Yes

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Were any inconsistencies found? No

## 5.A. Living wages are paid

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings
<b>Systems and evidence examined to validate this code section</b>	<p>1. The policy #CR-2026-1 and procedures updated on 11/1/2026. were reviewed.</p> <p>2. The site paid for overtime premiums as per the legal requirements as the following:</p> <ul style="list-style-type: none"> <li>a.135% of the basic wages for daylight overtime hours.</li> <li>b.170% of the basic wages for night overtime hours.</li> <li>c. 200% of the basic wages for overtime hours on rest days.</li> <li>d. 300% of the basic wages for overtime hours on holidays.</li> </ul> <p>3. The site has Policy in Living wages on 11/1/2026 and</p> <p>5.A.A Requirement met – Workers’ total pay, including benefits, has been reviewed and compared with a credible living wage benchmark. A living wage gap assessment has been conducted to understand the proportion of the workforce affected.</p> <p>5.A.B Requirement met – A wage improvement plan is in place, aiming to progressively achieve a living wage within a defined time frame.</p> <p>Evidence examined:</p> <ul style="list-style-type: none"> <li>Benchmark living wage data from credible sources</li> <li>Living wage gap assessment report</li> <li>- Payroll records of 10 sampled workers for January 2026 (Recent), December 2025 (Random ) and November 2025(Peak ) were reviewed during the audit.</li> <li>- Deduction, Attendees and Incentive records.</li> <li>- Management Interview.</li> <li>- Worker's interview.</li> <li>- Training records.</li> </ul>		

## 6. Working hours are not excessive

### Management systems

**Develop and maintain relevant policies and procedures to ensure workplace requirements are met**      Some Improvements Recommended

**Appoint a manager with sufficient seniority who is responsible for implementing procedures**      Some Improvements Recommended

**Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures**      Some Improvements Recommended

**Monitor the effectiveness of procedures to meet policy and workplace requirements**      Some Improvements Recommended

## Management systems

### Explanation for management systems grades

1. Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met

Assessment: The company already has policies in place related to working hours, reflecting a commitment to compliance.

Improvement Opportunity: To strengthen this framework, the policies can be made more comprehensive and consistently enforced. Enhancements should include clearer guidance on overtime limits, mandatory rest periods, and documentation requirements. Updating policies in line with local labor laws will provide employees with stronger protections and improve overall compliance.

2. Appoint a competent Working Hours Manager with sufficient seniority who is responsible for implementing procedures

Assessment: A Working Hours Manager position is established and currently in place.

Improvement Opportunity: Assigning or developing a senior manager with greater authority and enhanced expertise will improve oversight and ensure consistent enforcement of policies. This will reduce the risk of excessive working hours and strengthen accountability across the organization.

3. Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

Assessment: Communication and training initiatives on working hours exist but are not fully comprehensive.

Improvement Opportunity: Expanding training for employees, managers, and supervisors on legal requirements, internal policies, and the importance of balanced schedules will enhance awareness. Regular sessions will ensure proper understanding of time-tracking, rest periods, and compliance with working hour regulations.

4. Monitor the effectiveness of procedures to meet policy and Workplace Requirements

Assessment: Monitoring mechanisms for working hours are present but require strengthening.

Improvement Opportunity: Developing a more robust system for regular review will help identify excessive hours, non-compliance with rest requirements, and gaps in enforcement. Continuous monitoring will allow management to detect issues early, take corrective actions, and ensure full compliance with workplace standards.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

[← Code area 5.A](#)

[Code area 7 →](#)

**Systems and evidence examined to validate this code section**

1. The working hours policy and procedures #CY-2026-1 on 11/1/2026 were reviewed.
2. The site works 6 days a week from Saturday to Thursday and Friday is the weekly day off  
The site work one shift from 8:00 am 4:00 pm break 12:00 To 13:00
3. All sampled workers rest 1 day per week and work for 6 days/week based on Egyptian labor law and the facility internal policy. All the workers are hired directly by the site and there are no agency workers in the site.
4. During the workers' interview and documents review it was noted that overtime work is voluntary; information from workers' interviews coincides with time and payroll records. The sampled workers stated that they work overtime hours, and it was confirmed during the time records review.
5. The facility has designated the HR Manager to be a responsible person for implementing and monitoring the procedure.
6. The evidence examined during the audit:
  - Hiring procedures 11/1/2026 was reviewed.
  - Policy was approved and signed from senior management.
  - Production output summaries, time-stamped records from monitoring systems, and supervisor records.
  - Attendance records and payroll records for January 2026 (Recent), December 2025 (Random ) and November 2025(Peak ) were reviewed during the audit
  - Bank transfer confirmations for payroll disbursements matching payroll data.
  - Overtime calculations and approvals.
  - Leave records and corresponding payroll adjustments.
  - Legal compliance report confirming compliance with minimum wage and overtime pay regulations.
  - Demographics and job roles of workers interviewed to ensure diverse representation.
  - Workers' signed consent to participate in interviews and confidentiality agreements.
  - Interview with 10 workers.
  - Management interview.
  - Grievance and suggestion boxes.

## 6. Working hours are not excessive

### Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	135%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	Not Applicable, the facility pays overtime premiums as per Egyptian labor law # 14/ 2025, Article # 121 which required overtime fee as following: a.135% of the basic wages for day light overtime hours. b.170% of the basic wages for night overtime hours. c.200% of the basic wages for rest day overtime hours. d.300% of the basic wages for holidays overtime hours.
Excluding overtime, what are the regular working hours per week for workers at this site?	48.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	58.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	58.0
Maximum number of days worked without a day off in sample	6

[← Code area 6](#)

[Code area 7 →](#)

## 7. No discrimination is practiced

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
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Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
--	-------------------------------

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
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Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
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## Management systems

### Explanation for management systems grades

1. Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met

Assessment: Anti-discrimination policies are in place, reflecting the company's commitment to fair and equal treatment.

Improvement Opportunity: Policies can be strengthened by expanding coverage to explicitly address all forms of discrimination, including gender, race, ethnicity, age, disability, religion, and sexual orientation. Regular updates and clearer definitions will ensure consistent application and alignment with evolving best practices and legal standards.

2. Appoint a competent Anti-Discrimination Manager with sufficient seniority who is responsible for implementing procedures

Assessment: An Anti-Discrimination Manager role already exists, providing a foundation for accountability.

Improvement Opportunity: Enhancing the authority, seniority, and expertise of the appointed manager will improve the effectiveness of implementation and enforcement. Clearer responsibilities and stronger leadership will ensure consistent application of anti-discrimination policies across all departments.

3. Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

Assessment: Some communication and training initiatives regarding anti-discrimination policies are in place.

Improvement Opportunity: Expanding these initiatives to be more comprehensive, inclusive, and frequent will strengthen understanding across all levels of staff. Regular and thorough training will reinforce employees' rights and responsibilities, supporting a culture of respect, inclusivity, and zero tolerance for discrimination.

4. Monitor the effectiveness of procedures to meet policy and Workplace Requirements

Assessment: Monitoring processes exist but are not systematic or fully effective.

Improvement Opportunity: Establishing a structured and regular monitoring framework will help assess how well policies are being implemented, identify potential gaps, and enable timely corrective actions. Continuous evaluation will drive improvement and ensure compliance with workplace requirements.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

[← Code area 6](#)

[Code area 8 →](#)

**Systems and evidence examined to validate this code section**

7.A

A clear anti-discrimination policy is in place. No discriminatory practices were observed during the audit. Worker interviews confirmed equal treatment regardless of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership, or political affiliation.

7.B

Clear employment policies exist to prevent discrimination at all stages of employment, including hiring, compensation, access to training, promotion, termination, or retirement. These policies are applied equally to all workers.

7.C

Health checks are not required or used in a discriminatory manner during recruitment or employment. Any health checks comply with local legal requirements and do not target specific conditions such as pregnancy unless legally required.

7.D

Grievance mechanisms are accessible to all workers regardless of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership, or political affiliation. Procedures are clear and fairly implemented.

7.E

A dedicated equity approach is in place for recruitment, training, development, and promotion processes. Opportunities are provided fairly, and monitoring ensures equal access to career advancement.

7.F

Full compliance with all applicable local laws regarding non-discrimination was verified. No non-compliance or issues were identified.

Evidence Examined:

Anti-discrimination policy and diversity statement.

Records of awareness sessions for staff regarding non-discrimination.

On-site observations showing equal treatment of workers.

Interviews with workers confirming no discrimination practices.

7. No discrimination is practiced

## Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)? 0%

Representation of women in managerial roles (ratio of women workers to women managers) 6%

Representation of women in supervisory roles (ratio of women workers to women supervisors) 6%

Three most common nationalities in managerial and supervisory roles Egyptian: 100%.

## 8. Regular employment is provided

### Management systems

**Develop and maintain relevant policies and procedures to ensure workplace requirements are met**      Some Improvements Recommended

**Appoint a manager with sufficient seniority who is responsible for implementing procedures**      Some Improvements Recommended

**Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures**      Some Improvements Recommended

**Monitor the effectiveness of procedures to meet policy and workplace requirements**      Some Improvements Recommended

## Management systems

### Explanation for management systems grades

1. Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met

Assessment: Policies on employment contracts and conditions are in place, reflecting the company's commitment to fair employment.

Improvement Opportunity: These policies can be enhanced to more clearly address the need for regular and stable employment. Strengthening guidance on managing temporary or casual contracts will reduce job insecurity and ensure consistent, long-term employment practices aligned with labor standards.

2. Appoint a competent Employment Practices Manager with sufficient seniority who is responsible for implementing procedures

Assessment: A manager is assigned to oversee employment practices, providing a foundation for accountability.

Improvement Opportunity: Enhancing the competence, authority, and responsibilities of this role will improve oversight and enforcement of fair employment practices. A stronger managerial structure will ensure consistent application of policies, minimize reliance on short-term or non-regular contracts, and strengthen job security for employees.

3. Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

Assessment: Communication and training on employment practices exist but are limited in scope and consistency.

Improvement Opportunity: Expanding training programs to cover job stability, contract clarity, and legal requirements will help ensure that employees, managers, and supervisors fully understand their roles and responsibilities. Regular, structured training will reinforce the company's commitment to stable and fair employment.

4. Monitor the effectiveness of procedures to meet policy and Workplace Requirements

Assessment: Monitoring processes for employment practices are not yet systematic or comprehensive.

Improvement Opportunity: Introducing a structured monitoring and evaluation system will ensure alignment with company policy and labor law. Regular reviews will help detect gaps, confirm compliance, and continuously improve employment stability across the organization.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings
<b>Systems and evidence examined to validate this code section</b>	<ol style="list-style-type: none"> <li>1. The site employs its employees through a selection and interview mechanism, based on qualifications and ability.</li> <li>2. The site has 7 permanent employees and 20 temporary employees.</li> <li>3. All employees were directly employed by the site.</li> <li>4. The obligations towards employees under labor laws and regulations or social security arising from the regular employment relationship were verified and adequately fulfilled.</li> <li>5. The evidence examined during the audit: <ul style="list-style-type: none"> <li>- Employee files ( Employment contracts).</li> <li>- Personal identification documents.</li> <li>- Q2 insurance.</li> <li>- Latest insurance payment receipt.</li> <li>- Interviews with employees and management.</li> </ul> </li> </ol>		

8. Regular employment is provided

## Data points

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

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

### Management systems

**Develop and maintain relevant policies and procedures to ensure workplace requirements are met** Robust Management Systems

**Appoint a manager with sufficient seniority who is responsible for implementing procedures** Robust Management Systems

**Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures** Robust Management Systems

**Monitor the effectiveness of procedures to meet policy and workplace requirements** Robust Management Systems

## Management systems

### Explanation for management systems grades

The system developed for subcontracting and homeworker requirements is robust and supports sustainable long-term compliance.

The company manages subcontracting and the use of homeworkers responsibly, effectively addressing key social risks such as exploitation and unsafe working conditions. Clear communication channels are in place to ensure that all involved parties—both internal and external—are informed about the company’s expectations and fair labor practices.

Comprehensive monitoring systems are implemented to ensure that all subcontracted work adheres to the same ethical and labor standards as the company’s direct operations. These include the provision of fair wages, safe working environments, and strict prohibition of any form of exploitation. Training is provided to both subcontractors and internal staff to reinforce compliance with labor laws and to promote responsible sourcing.

These initiatives reflect the company’s strong commitment to ethical business conduct and social responsibility. As a result, all workers—including remote and subcontracted workers—are treated with fairness, dignity, and respect. No breaches were identified in this area, further confirming the strength and sustainability of the systems in place.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

**Systems and evidence examined to validate this code section**

1. The employment policy and procedure which updated on 11/1/2026 were reviewed.
  2. During the audit, there were no sub contracting or home workers hired by the site.
  3. The evidence examined during the audit:
    - Site tour.
    - Workers interviews.
    - Interviews with employees and management.
    - Training records.
-

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

### Data points

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

Gender disaggregated data available

### Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homemaker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers? No  
 N/A. The site's service or product providers don't engage with sub-contracting / home workers.

### Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity? No  
 During the site walkthrough, workers' interview and management interview, it was evident that there were no subcontracting / home workers hired by the site.

Are any sub-contractors used?

No

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[← Code area 8.A](#)

[Code area 9 →](#)

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Audit company:  
**LSQA MIDDLE EAST**

Audit reference:  
**ZAA600184440**

Start Date:  
**2026-02-25**

End Date:  
**2026-02-26**

## 9. No harsh or inhumane treatment is allowed

### Management systems

**Develop and maintain relevant policies and procedures to ensure workplace requirements are met**      Some Improvements Recommended

**Appoint a manager with sufficient seniority who is responsible for implementing procedures**      Some Improvements Recommended

**Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures**      Some Improvements Recommended

**Monitor the effectiveness of procedures to meet policy and workplace requirements**      Some Improvements Recommended

## Management systems

### Explanation for management systems grades

Develop and maintain relevant policies and procedures to ensure Workplace Requirements are met

The company has established policies to prevent harsh or inhumane treatment, and these provide a solid foundation. However, to ensure full effectiveness, policies can be further enhanced to cover all potential forms of mistreatment and to include clear procedures for handling complaints, investigating incidents, and supporting affected employees. Strengthening these elements will help employees feel fully confident and secure in reporting any concerns.

Appoint a competent Anti-Abuse Manager with sufficient seniority who is responsible for implementing procedures

A manager has already been assigned to oversee anti-abuse policies. To maximize effectiveness, the role should be given additional authority, resources, and seniority. This will improve accountability, ensure consistent implementation of procedures, and reinforce employees' trust in the reporting and investigation process.

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

The company already communicates policies, but training can be expanded and delivered more regularly to ensure that all employees, managers, and supervisors clearly understand what constitutes mistreatment, how to report concerns, and what support systems are available. Enhanced and continuous training will ensure that everyone is confident in applying the company's zero-tolerance approach to mistreatment.

Monitor the effectiveness of procedures to meet policy and Workplace Requirements

Procedures for handling complaints and preventing mistreatment are in place. To further strengthen these, monitoring should be made more regular and systematic, supported by employee feedback and periodic reviews. This will ensure procedures remain effective, build trust in the system, and drive continuous improvement.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

[← Code area 8.A](#)

[Code area 10.A →](#)

**Systems and evidence examined to validate this code section**

1. The site has a suggestions and claims management procedure which updated on 11/1/2026 and it states that there is a suggestion box for employees to make suggestions or claims and a phone number and email for third parties. The suggestion box is opened on weekly basis, by administrative or human resources representative whit a worker, during the season and once a month out of season, the claims or requests are registered and treated. Employee feel free to speak directly to their supervisors or site managers.

2. According to the facility tour and the document review it was found no evidence verified of any type of harsh or inhumane treatment. The working environment in the company seemed to be very good.

3. The evidence examined during the audit:

- Social and Fair-Trade Policy (11/1/2026).
- Suggestions and Claims Management Procedure (11/1/2026).
- Policy regarding situations of sexual harassment (11/1/2026).
- General procedure in situations of sexual harassment PRG (11/1/2026)
- Claims and suggestion registers.
- Employee interviews.
- Management interviews.
- Suggestion and grievance boxes.

## 9. No harsh or inhumane treatment is allowed

### Data points

**Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?**

Yes, there is a formal grievance process  
The grievance process is available to all workers

**What type of grievance mechanism(s) are available?**

The facility has a grievance mechanism which allows all workers to freely communicate with management through an open-door policy and grievance boxes located near the toilets and dining area to report any issue related to human rights and working conditions.

In addition, a workers' representative has been elected to support communication between workers and management. The workers' representative participates in receiving workers' concerns and coordinating with management when needed.

The HR Manager is responsible for checking the grievance boxes on a weekly basis and ensuring that all complaints are reviewed and addressed appropriately.

**Number of grievances raised in the last 12 months**

0

**Number of grievances resolved in the last 12 months**

0

## 10.A. Environment 2-Pillar

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
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Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
--	-------------------------------

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
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Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
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## Management systems

### Explanation for management systems grades

**Develop and Maintain Relevant Policies and Procedures to Ensure Workplace Requirements are Met**  
 The company has environmental policies in place that provide a foundation for responsible operations. To further strengthen these, the policies should be updated to include clear definitions, measurable objectives, and targets to minimize environmental impact. Expanding coverage to address all key areas of environmental management, and ensuring consistent procedures across departments, will enhance alignment with best practices and sustainability goals.

**Appoint a Competent Environmental Manager with Sufficient Seniority Who is Responsible for Implementing Procedures**  
 Environmental oversight is currently in place. To maximize effectiveness, the role should be elevated with additional competence, authority, and resources. This will improve accountability, ensure consistent enforcement of environmental procedures, and support measurable progress in sustainability and environmental performance.

**Communicate and Train Employees, Managers, and Supervisors on Relevant Policies and Procedures**  
 The company already has environmental policies, but communication and training efforts can be further strengthened. Regular training sessions should be provided to employees, managers, and supervisors to ensure awareness of environmental responsibilities and to encourage active participation in sustainability initiatives. Enhanced communication will build stronger engagement and foster consistent environmental practices across all levels of the organization.

**Monitor the Effectiveness of Procedures to Ensure Alignment with Policy and Workplace Requirements**  
 Environmental procedures are in place, but monitoring can be expanded and systematized. Establishing regular evaluation mechanisms will help assess effectiveness, track progress against objectives, and identify areas for continuous improvement. This will ensure that the company's environmental commitments are met and that sustainability goals are achieved.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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[← Code area 9](#)

[Code area 10.B →](#)

No findings

**Systems and evidence examined to validate this code section**

1. The site has a Water use and Protection of Natural Resources Policy (11/1/2026), which states the site commitment to minimize environmental impact and pollution and care of the environment. The environmental policies communicated to all the relevant personnel such as workers, managers, supervisors, suppliers and customers were reviewed.
  
2. The site has established and maintained environmental management system, which was updated on (11/1/2026) H&S Manager has trained all the workers and supervisors on Environmental hazards and waste management on (11/1/2026) And the last water analysis on (17/11/2025)
  
3. During the audit, it was evident the following:
  - Special waste: stored and retired and treated by registered companies.
  - Discarding of fruit: is sold to other industries.
  - Bins: are fixed or sold as firewood.
  - Empty containers of agrochemicals: retired
  
4. The evidence examined during the audit:
  - SAQ.
  - Water use and Protection of Natural Resources Policy (11/1/2026)
  - Certificates.
  - Management interview.
  - Workers interview.
  - Site tour.
  - Data of Waste Companies: Contracts Official licenses ,Waste disposal logs, types of waste handled, and disposal methods.

## 10.A. Environment 2–Pillar

### Data points

Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?

No

Does the site have any valid environmental or energy management certificates?

None

Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC))?

No

Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?

No

[← Code area 10.A](#)

[Code area 10.B →](#)

## 10.B. Environment 4-Pillar

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings
<b>Systems and evidence examined to validate this code section</b>	1-The full environmental risk assessment dated 11/1/2026. 2-site tour. 3-Environmental analysis complying with the law limits.		

[← Code area 10.A](#)

[Code area 10.C →](#)

## 10.B. Environment 4-Pillar

### Data points

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes
What additional specific environmental policies does the site capture?	Sustainable material sourcing Packaging optimization
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes  The facility complies with legal requirements according to the Egyptian environmental law 4/1994 and also complies with legal requirements of clients
Does the site have reduction targets in place to manage climate related risks?	None
Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?	Yes  As mentioned in the factory's environmental policy and as agreed with the clients, to control their water and electricity consumption, that's why the factory keeps the payment and consumption receipts for the last 24 months to be ready for review the Latest environmental measurements on 1/11/2025
Has the site checked that any sub-contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	Not Applicable

### Usage/discharge analysis

[← Code area 10.B](#)

[Code area 10.C →](#)

	Last full calendar year (2025)	Previous full calendar year (2024)
Total electricity consumption from non-renewable sources (kWh)	210,000	190,000
Total electricity consumption from renewable sources (kWh)	0	0
Sources of renewable energy used	None	None
Types of renewable energy used	Data not available	Data not available
Total natural gas consumption (kWh)	0	0
Usage of other purchased fuels	None	None
Has the site completed any carbon footprint analysis?	No	No
Water sources	local water	local water
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	14,500	12,360
Water discharged	None	None
Water volume discharged (m3)	12,300	10,200
Water volume recycled (m3)	0	0
Total waste produced (mt)	500	460

[← Code area 10.B](#)

[Code area 10.C →](#)

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Total hazardous waste produced (mt)	0	0
Waste to recycling (mt)	120	100
Waste to landfill (mt)	0	0
Waste to other (mt)	380	360
Total product produced (mt)	10,000	9,500

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## 10.C. Business ethics

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
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Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
--	-------------------------------

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
--	-------------------------------

Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
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[← Code area 10.B](#)

## Management systems

### Explanation for management systems grades

Develop and Maintain Relevant Policies and Procedures to Ensure Workplace Requirements are Met

Reason for Improvement: The company has established business ethics policies and procedures, reflecting its commitment to ethical conduct. However, these policies would benefit from being expanded and updated to cover all relevant areas in more detail. For example, clearer guidance is needed on handling specific ethical issues such as bribery, conflicts of interest, and reporting misconduct. Strengthening the clarity and scope of these policies will ensure that employees at all levels fully understand the company's ethical expectations, particularly in dealings with vendors, customers, and business partners.

Appoint a Senior Manager Responsible for Implementing Procedures

Reason for Improvement: Oversight of business ethics is already assigned, but the current role would benefit from greater seniority, authority, and resources. Elevating responsibility to a senior manager with clear accountability will reinforce leadership commitment, ensure consistent enforcement of ethical guidelines, and enhance employee trust in the company's ethics framework.

Communicate and Train Employees, Managers, and Supervisors on Relevant Policies and Procedures

Reason for Improvement: While business ethics policies exist, the company's communication and training programs could be more structured and comprehensive. Strengthening training—tailored to different roles—will improve awareness of ethical standards, enable employees to recognize potential dilemmas, and ensure they know how to report concerns confidently. This will reinforce a strong ethical culture across the organization.

Monitor the Effectiveness of Procedures to Meet Policy and Workplace Requirements

Reason for Improvement: The company has procedures in place for business ethics, but monitoring and evaluation mechanisms need to be more consistent and systematic. By enhancing monitoring, the company can better assess the effectiveness of its ethics framework, identify areas for improvement, and ensure employees are consistently adhering to ethical standards.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
-----------	-----------------------	------------	---------

[← Code area 10.B](#)

No findings

**Systems and evidence examined to  
validate this code section**

- Written business ethics policy. in 11/1/2026
  - induction training.
  - business ethics procedure.
  - training record.
  - facility tour.
  - management review.
  - workers interview
- 

[← Code area 10.B](#)

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10.C. Business ethics

## Data points

Has the site received an official notice, fine or prosecution for any non-compliances with business ethics legislation, regulation, consent or permits (within the last three years)?

No

Provide any certified anti-bribery management systems for the site

The site has not obtained anti-bribery certificates

[← Code area 10.C](#)

## Attachments



[grievance box.jpeg](#)



[First Aid box.jpeg](#)



[toilets.jpeg](#)

[SAQ\\_ZS1000099669.pdf](#)



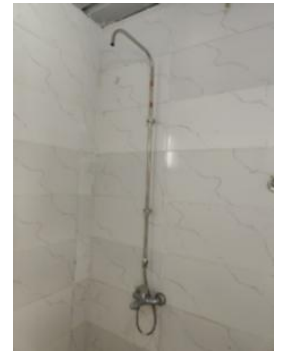
[Assembly Point.jpg](#)



[Administrative building.jpg](#)



[fire extinguisher.jpeg](#)



[Shower facility.jpg](#)



[Final Products.jpeg](#)



[Security Room.jpg](#)



[Toilet.jpg](#)



[Main Gate.jpg](#)



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[Site Name.jpg](#)



[Packing Hall.jpeg](#)



[one electrical panel was Not provided by rubber mat in the Production hall.jpg](#)



[Packing Hall \(2\).jpeg](#)



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