

# 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

Sedex site reference	ZS418776191	Site name	Glass textile private free zone Branch of Glass textile Co SAE
Business name	Glass textile-private free zone - branch of glass textile S.A.E	Site address	3 El montaser st., Factories road, Shoubra el khema Cairo EG 11672

## Audit details

Sedex company reference	ZC418771016	Auditor company name	GSCS International Ltd
Audit company address	LG Building, Plot No-215-389 LG Building, UMM Ramool,, Dubai, AE, 215389		
Date of audit	2025-12-08	Audit conducted by	Gokhan Coskun
Audit pillars	Labour Standards   Health and safety   Environment 4-Pillar   Business ethics		
Time in and out	<div>Day 1</div> <div>In08:30</div> <div>Out16:00</div>		
Audit type	Periodic		
Was the audit announced?	Semi announced		

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Was the Sedex SAQ available for review? No

Who signed and agreed CAPR? MUHAMMED MUBARAK / GENERAL MANAGER ASISTAN

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	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting	There is no registered union in the facility, workers are allowed to form unions or elect worker committee / representative and in case there is no union worker council committee or joint work council should be present as alternative, But the facility has worker representative at place. During the opening meeting Senior management and worker representative were attend the opening meeting.		
Reason for absence during the audit	There is no registered union in the facility, workers are allowed to form unions or elect worker committee / representative and in case there is no union worker council committee or joint work council should be present as alternative, But the facility has worker representative at place. During the opening meeting Senior management and worker representative were attend the opening meeting.		
Reason for absence at the closing meeting	There is no registered union in the facility, workers are allowed to form unions or elect worker committee / representative and in case there is no union worker council committee or joint work council should be present as alternative, But the facility has worker representative at place. During the opening meeting Senior management and worker representative were attend the opening meeting.		

# SMETA declaration

## Auditor team

### SMETA declaration

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

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

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

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

NONE

### Lead auditor

Gokhan Coskun

### APSCA Number

21700709

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## Auditor team

Additional auditor	Ahmed Diaa	APSCA Number	21705402
	Abdelrahman Emad	APSCA Number	32400584
	Abdelaziz Mohamed	APSCA Number	21704720

Date of declaration 2025-12-08

## Site representation

Declaration	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
Full name	MUHAMMED MUBARAK
Title	GENERAL MANAGER ASISTAN
Date of declaration	2025-12-08



# Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.M Ensure all machinery is installed, mainta...	Base code	NC <a href="#">ZAF601267310</a>
5. Legal wages are paid	5.D Ensure no deduction from workers pay is f...	Base code	NC <a href="#">ZAF601267309</a>
8. Regular employment is provided	8.A Provide a written contract or other bindi...	Local law Base code	NC <a href="#">ZAF601267308</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	✓	✓	✓	i
4. Child labour shall not be used	✓	✓	✓	✓
5. Legal wages are paid	✓	✓	✓	i
6. Working hours are not excessive	✓	✓	✓	✓
7. No discrimination is practiced	✓	✓	✓	✓
8. Regular employment is provided	✓	✓	i	i



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

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# Site details

## Company and site details

Sedex company reference	ZC418771016	
Sedex site reference	ZS418776191	
Company name	Glass textile-private free zone - branch of glass textile S.A.E	
Business ownership type	GOODS	
Site name	Glass textile private free zone Branch of Glass textile Co SAE	
Site name in local language		
GPS location	GPS address	The facility located at 3 El montaser st., Factories road, Shoubra el khema
	Coordinates	30.123023, 31.261139
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	Mohamed Moubarak
	Job title	General Manager Assistant
	Phone number	002 0100 54 94 888
	Email	mohamed_mubarak@glassgarments.com
Applicable business and other legally required business license numbers and documents	<p>The facility has the following legal documents:</p> <ul style="list-style-type: none"> <li>- Tax card # 752-119-192, valid from 11/5/2023 till 10/5/2028.</li> <li>- Commercial register # 8305, last print on 08/05/2024.</li> <li>- Operation permit #21, dated 10/07/2024, from GAFI.</li> <li>- Boiler License # 133/5/1 valid till 21/7/2029.</li> </ul>	

[← Management systems](#)

[Worker analysis →](#)

## Site activities

Site function	Factory Processing/Manufacturer	
Site activities	Primary	Manufacture of wearing apparel (clothing), except fur apparel
	Secondary	
	Other	
Product type	The facility products are ready-made Garments (Waven bottoms ).	
Process overview	<p>Receiving raw material, inspection, cutting, Dyeing, sewing, washing, packing &amp; shipping.</p> <p>products is Waven bottoms</p> <p>The facility has total number of</p> <ul style="list-style-type: none"> <li>- 2 Cutter for cutting section.</li> <li>- 4 Production line at sewing (70 Machines per production line).</li> <li>- 6 Dyeing and washing machines.</li> </ul> <p>The factory established since 1999.</p>	
What level of mechanization best describes the work at this site?	Fair mechanisation / manual Labour	

## Site scope

Is the audited site a physically continuous area?	Yes
What is the area of audited site to its boundary?	2000m <sup>2</sup>

[← Management systems](#)

[Worker analysis →](#)

## Site scope

Building 1	Last construction works on site	1998
	If building is shared, provide details	Not applicable
	Number of floors	5
	Description of floor activities	Ground floor: Cutting, dyeing/ washing, fabric , warehouse, diesel generator, wastewater treatment and administration offices. There is a contractor activities (painting). 1st floor : Sewing. 2nd floor: Packing and final product store. 3rd floor : Sewing. 4th floor: Cafeteria, compressor, admin offices, soft water, and boiler.
Is there any difference between the site scope of the audit and the Sedex site profile?	No	
Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?	No	
Is any activity conducted onsite not included within the scope of the audit?	No	

## Worker accommodation and transport

Are there any site-provided worker accommodation buildings?	No
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[← Site details](#)

[Worker analysis →](#)

## Worker accommodation and transport

Does the site organise worker transport to the worksite?	Third party
	The facility rent the transportation way for all workers.

## Work patterns

Approximate workers on site per month (% of peak)	January	95-100%	February	95-100%
	March	95-100%	April	95-100%
	May	95-100%	June	95-100%
	July	95-100%	August	95-100%
	September	95-100%	October	95-100%
	November	95-100%	December	95-100%

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

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact?	ISO 45001 (OHS), ISO 14001 (Environmental management), Other management system certification, Other certification
	<p>The facility certified for</p> <ul style="list-style-type: none"> <li>- ISO 9001:2015 from SSC valid from 04/08/2024 till 03/08/2027.</li> <li>- ISO 14001:2015 from SSC valid from 04/08/2024 till 03/08/2027.</li> <li>- ISO 45001:2018 from SSC valid from 14/07/2024 till 13/07/2027.</li> <li>- GOTS, GRS, OCS &amp; RCS from GSCS, valid till 30/11/2026.</li> </ul>

## Site assessments

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?	<p>No</p> <p>it was observed from the documentation review, site tour, and management interview; there is no any negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community.</p>
Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?	<p>No</p> <p>it was observed from the documentation review, site tour, and management interview; the facility conducted Partial risk assessment for human rights dated 21/4/2024.</p>

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# Worker analysis

Gender disaggregated data available      Men and women

## Worker totals

	Men	Women	Other	Total
Number of workers	297 (52%)	274 (48%)	- -	571 (100%)

## Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	297 (52%)	274 (48%)	- -	571 (100%)
Temporary or fixed term employees	0 -	0 -	- -	0 (0%)
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

[← Site details](#)

[Worker interviews →](#)

## 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

There is no any migration applied at place.

## Workers by age

	Men	Women	Other	Total
18 - 24 years old	73 (52.5%)	66 (47.5%)	- -	139 (24.3%)
15 - 17 years old	0 -	0 -	- -	0 (0%)
Under 15 years old	0 -	0 -	- -	0 (0%)

\* % of total workforce

[← Worker analysis](#)

[Worker interviews →](#)

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	52%	48%	-	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	297 (52%)	274 (48%)	- -	571 (100%)

\* % of total workforce

[← Worker analysis](#)

[Worker interviews →](#)

## Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 -	0 -	- -	0 (0%)
Paid weekly	0 -	0 -	- -	0 (0%)
Paid monthly	297 (52%)	274 (48%)	- -	571 (100%)
Other	0 -	0 -	- -	0 (0%)

\* % of total workforce

If other payment cycle entered, please provide details

There is no any other payment method at place.

## People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	6 (75%)	2 (25%)	- -	8
Supervisors or team leaders	18 (72%)	7 (28%)	- -	25
Administrative staff	21 (56.8%)	16 (43.2%)	- -	37

[← Worker analysis](#)

[Worker interviews →](#)

# 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      The interview conducted as follows:  
- 6 groups of 5 (3 groups of women, and 3 groups of men)

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

[← Worker analysis](#)

[Measuring workplace impact →](#)

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?

Accommodation standards  
Communication (e.g. from management)  
Hours worked, rest days or breaks  
Job security

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

Pay  
Transport

Additional comments

As per interview with workers; they are satisfied from the pay ontime with compliance with legal requirements and transportation used.

Attitude of workers' committee/union representatives

The interviewed Worker representative confirmed that facility management is cooperative with worker committee and support their rules

Attitude of managers

The facility management was found to be cooperative throughout the audit and had a positive attitude towards the auditors' team

## Workers interviewed by type

	Total
Permanent workers	45
Temporary or fixed-term employees	0
Agency or subcontracted workers	0

[← Worker analysis](#)

[Measuring workplace impact →](#)

## Workers interviewed by type

Seasonal workers	0
Other workers	0
Total number of workers interviewed	45

## Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	15	15	-	30
Workers interviewed individually	8	7	-	15

Migrant workers interviewed

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



# Measuring workplace impact

Gender disaggregated data available      Men and women

## Annual worker turnover (%)\*

	Men	Women	Other	Total
Last full quarter (90 days)	1.1%	0.9%	-	2.0%
Last full calendar year (2024)	1.1%	0.9%	-	2.0%
Previous full calendar year (2023)	2.55%	2.45%	-	5.0%

\* 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)	4.1%	3.9%	-	8.0%
Last full calendar year (2024)	4.1%	3.9%	-	8.0%
Previous full calendar year (2023)	5.35%	5.2%	-	10.55%

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

Are accidents recorded?      Yes

The facility keeps the records of accidents and incidents; verified during the

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

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

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

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

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

## Percentage of workers that work on average more than 48 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 (2024)	0.0%	0.0%	-	0.0%

[← Worker interviews](#)

[Code area 0 →](#)

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

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

# 0. Enabling accurate assessment

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>1-The company has written policies and procedures which prohibit forced, bonded and compulsory labor, this policy was reviewed in compliance with the Egyptian labour law and ETI base code requirements.</p> <p>2-The facility recruited the workers through interviewing with the HR representatives and filling application form.</p> <p>3-The sampled workers stated that they are free to leave the workplace after reasonable notice, also during the facility walkthrough, all the doors are unlocked.</p> <p>4-It was evident during the facility walkthrough that there were no concerns regarding forced labour, migrant workers observed, and it was confirmed during the workers' interviews.</p> <p>5-No kind of forced, bonded or compulsory labor is used in the factories. The sampled workers stated that they have free access to the factory facilities and can leave work after working hours end.</p> <p>6-During the factory tour, there were no signs of fear among the workers. The security guards are assigned for ensuring safety of employees and facility and regular security jobs.</p> <p>8- Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures were checked during the audit.</p> <p>The following evidences were examined:</p> <ul style="list-style-type: none"> <li>•Company policy and procedures last issued 01/01/2025.</li> <li>•workers interview</li> <li>•management interview</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

# 1. Employment is freely chosen

## Management systems

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

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

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

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

## Management systems

### Explanation for management systems grades

Clear Policies About Voluntary Employment:

Grading: Robust Management System

- The factory has clear policies that say all workers must choose to work freely. These policies are shared with everyone—workers, supervisors, and hiring agencies—so everyone understands that no one should be forced to work through threats or pressure. Forced Labor, Bonded Labor, Voluntary Work Policy, Free and Fair Employment Policy were found during documentation review.

- Regulatory Compliance:

The factory follows all Business ethics and regulations, including permits and reporting requirements.

- Responsible Person:

Grading: Robust Management System

Hamdy Hemly – HR Manager is implementing HR procedure to check the workers' original documents upon hiring and keep copies of all these documents and related workers information in their personal files. During the documents review, there is no deposits are required, no personal documents are retained.

- Employee Training:

Grading: Robust Management System

The factory provides regular training to both workers and managers about forced labor and explains workers' rights. New workers learn about these rights when they start, and training is repeated regularly.

- Regular Monitoring:

Grading: Robust Management System

The factory regularly monitors its freely chosen employment, and did Internal Audit dated 04/06/2025.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

[← Code area 0](#)

[Code area 1.A →](#)

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

- 1.The facility has implemented and maintained a system to be in compliance with the Code area/ ETI Base Code requirements and this system was reviewed during the audit.
- 2.Human rights procedure was checked which covers human rights impacts and issues, and ensures it is communicated to all appropriate parties, including its own suppliers.
- 3.The facility has a transparent system in place for the confidentiality reporting and dealing with the human rights impacts and issues without any fear of reprisals. The facility has grievance mechanism which allows the workers to use the grievance box freely and has union' representatives to communicate with them for any complaints, in order to report any situation or case related to human rights (working conditions).
4. There is no subcontractor/ no agency workers/ no migrant workers at site.
5. The Written Contracts were checked in a Language Workers Understand such as Arabic, There is no Recruitment Fees or Hidden Costs.
7. It was confirmed during the workers interview and management interview, there is a Fair Treatment During Hiring Process,

The following evidences were examined:

- .Company Policy and procedures
- .management interview.
- .Training records
- . Awareness on SEDEX system by the Facility manager



1. Employment is freely chosen

# Data points

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

# 1.A. Responsible recruitment and entitlement to work

## Management systems

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

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

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

Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
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[← Code area 1](#)

[Code area 2 →](#)

## Management systems

### Explanation for management systems grades

Clear Hiring Policies:

Grading: Robust Management System

- The factory has clear rules for hiring workers. These rules make sure that all hiring is done fairly and without discrimination. They also ensure that workers are not charged any fees to get a job.

Responsible person:

Grading: Robust Management System

-The facility has designated Mr. Ahmed Shaker HSE Manager is responsible monitor, deploy and communicate the Human rights policy in the facility.

Training:

Grading: Robust Management System

-The factory did not implement any system to provide trainings on recruitment policy to the relevant staffs.

Monitoring and Auditing:

Grading: Robust Management System

- Facility implement internal audit on Responsible recruitment and entitlement to work, and did Internal Audit dated 4/06/2025 on all social Procedures .

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

[← Code area 1](#)

[Code area 2 →](#)

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

- 1.The facility has implemented and maintained a system to be in compliance with the Code area/ ETI Base Code requirements and this system was reviewed during the audit.
- 2.Human rights procedure was checked which covers human rights impacts and issues, and ensures it is communicated to all appropriate parties, including its own suppliers.
- 3.The facility has a transparent system in place for the confidentiality reporting and dealing with the human rights impacts and issues without any fear of reprisals. The facility has grievance mechanism which allows the workers to use the grievance box freely and has union' representatives to communicate with them for any complaints, in order to report any situation or case related to human rights (working conditions).
4. There is no subcontractor/ no agency workers/ no migrant workers at site.
5. The Written Contracts were checked in a Language Workers Understand such as Arabic, There is no Recruitment Fees or Hidden Costs.
7. It was confirmed during the workers interview and management interview, there is a Fair Treatment During Hiring Process,  
The following evidences were examined:
  - 1.Company Policy and procedures
  - 2.management interview.
  - 3.Training records

## 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

[← 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

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

Were recruitment fees or costs identified during worker interviews? No

There is no any recruitment fees or costs identified during worker interviews.

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

### Management systems

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

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

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

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

## Management systems

### Explanation for management systems grades

Policy on Freedom of Association:  
Grading: Robust Management System  
- The factory has a clear, a written policy as part of Company Company policy and procedures last issued 01/01/2022 that supports workers' rights to join or form trade unions or worker groups without fear of punishment. This policy is shared with all workers, supervisors, and managers so that everyone knows workers are free to organize.

Responsible person:  
Grading: Robust Management System  
-Mr. Ahmed Shaker HSE Manager and Mr. Hamdy Helmy (HR Advisor) are responsible to receive workers complaints and recommendations beside the Worker representative.

Training:  
Grading: Robust Management System  
-The factory arranges training on freedom of association to the workers about their rights on freedom of association and collective bargaining.

Monitoring and Auditing:  
Grading: Robust Management System  
- Facility implement internal audit on Freedom of association and right to collective bargaining activities, and did Internal Audit dated 04/06/2025 on all social Procedures.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		



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

1-The factory has a 5 workers representative ( 3 males + 2 females ) last election on 26/12/2024. The workers' representatives are communicated with the top management through conducting periodic meeting last meeting was on 18/11/2025  
 4-The organization has 1 grievance box distributed in the facilities.  
 6-It was evident during the workers interview that the above mechanism is communicated with the open-door policy and grievance policy as they confirmed that they are have the total free access to use these two communication methods with facility management.

- During the documentation review, worker representative interview and management interview, it was confirmed that all workers understand their legal rights, collective bargaining agreements and worker committees.

Requirement met as well as the facility was never 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.

There is no complaint during last 12 months.

The following evidences were examined:

- 1.Written grievance policy
2. workers interview.
- 3.Management interview.

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

[← Code area 2](#)

[Code area 3 →](#)

### 3. Working conditions are safe and hygienic

Management systems

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

## Management systems

### Explanation for management systems grades

#### OHS Policy:

Grading: Robust Management System

- The factory has a written QHSE policy as in Company policy and procedures last issued 01/01/2025, the facility certified for ISO 45001:2015 that prioritizes the safety and health of all workers.

This policy includes guidelines on safe working practices, the use of protective equipment, and emergency procedures. It is communicated to all workers and supervisors.

#### Responsible person:

Grading: Robust Management System

-The Facility appoint Mr. Ahmed Shaker HSE Manager, to monitor the health and safety environmental issues and chemical safety inside the organization.

#### Training:

Grading: Robust Management System

- All workers are provided with the necessary PPE (like gloves, helmets, masks) and are trained on how to use them properly.

#### Monitoring and Auditing:

Grading: Some Improvement Recommended

- Facility implement internal audit on OHS activities, and did Internal Audit dated 04/06/2025 on all social Procedures.

Some Improvements Recommended" for Communication & Monitoring as during the site tour, documentation review and management interview. it indicates some gaps in the management system operations, which may lead to the accident in the workplace or failure of managing of the emergency. observation is given below:

-During to site tour, management interview, worker interview found 5 of 60 sewing machine employees do not use eye protection equipment.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.M Ensure all machinery is installed, mainta...	Base code	NC <a href="#">ZAF601267310</a>

[← Code area 2](#)

[Code area 4 →](#)



## Systems and evidence examined to validate this code section

- 1.The facility provided safe and hygienic working environment according to the risk assessment plan and hazard identification procedure updated on 22/07/2024, also checked health & safety records such as emergency preparedness and response procedure which updated in 1/01/2022.  
The Facility appoint Mr. Ahmed Shaker OHE Manager, to monitor the Health and safety environmental issues and chemical safety inside the organization, but it's observed that exit sign with no adequate light.
  2. Health & safety policy and procedures updated on 1/01/2025, procedures such as the emergency preparedness and response procedure, health & safety work instructions, accident & emergency work instruction, all these policies and procedure were reviewed.
  - 3.The facility has provided clean toilet facilities (35 toilet 18 male +17 female )and potable water and provided sanitary facilities for food storage.
  - 4.The organization has well organized internal monitoring system. The facility conducts periodically internal monitoring covering H&S and fire safety, last internal audit was done in 04/06/2025., without Nc raised.
  - 5.The organization has a well-trained health and safety team which is headed by Mr. Ahmed Shaker OHE Manager.
  - 6.The organization has well-ventilated workstations, and temperature was in good and acceptable limits. The buildings are in good condition and there were no signs of cracks or construction problems.
  - 7.Buildings safety check reports were done externally by authorized party.  
Safety and Health Program:
  - 8.The organization has a well-trained health and safety team who is headed by Mr. Ahmed Shaker OHSE Manager.
  - 9.The organization has well trained Health and safety committees covering the factory who were assigned and chosen according to their qualifications and certificates as mentioned in the Egyptian labor law 14/2025. The facility has its own committee which held monthly meetings.  
Fire safety
  - 10.The organization has sufficient number of fire-fighting equipment.  
Fire extinguishers  
Fire hose reels  
Fire alarm push buttons
  - 11.First aid kit was available at site.
  - 12.The emergency response plan was last reviewed and updated.
  - 13.Fire extinguishers inspection is done internally on monthly basis by the HSE team and done externally each three months by third party  
Trainings
  - 14.Contract with fire fighting equipment maintenance dated 01/12/2025
- List of legal and other requirements were checked last updated 03/08/2025.

last training of HSE including PPES' was on 27/05/2025 for 35 participants

Emergency evacuation plan was checked cover all prepotencies.

Evacuation drill dated 25/11/2025, started 9am and finished after 50sec.

List of first aid kit was checked as there is one first aid box at place.

List of first aiders were checked and found included 2 persons.

List of fire fighting equipment

Pest control contract with pest killer dated 20/11/2025.

The Environmental pest control plan was checked and found implemented effectively.

List of pest killer was checked and found included 10 participants .

15. Training for Recruitment Staff were applied on a frequent bases, as well as internal audit against the code was carried out as.

Also the facility apply daily monitor through using of HSE checklist to ensure continues improvement at place.

The following evidence were examined:

Health, safety and hygiene procedures and policies were reviewed.

3. Facility walkthrough.

4. Management interview.

5. Workers interviews.

6. Document and records were reviewed during the audit:

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

Some Improvements Recommended" for Communication & Monitoring as during the site tour, documentation review and management interview. it indicates some gaps in the management system operations, which may lead to the accident in the workplace or failure of managing of the emergency. observation is given below:

-it's observed that 5 of 60 sewing machine employees do not use eye protection

equipment.



# Findings: non-compliances

ZAF601267310

Non-compliance

Due 2026-02-13

## Code area

3 Working conditions are safe and hygienic

## Status

Open\*

## Workplace requirement

3.M Ensure all machinery is installed, maintained, and used in a safe manner.

## Time given to resolve

30 days

## Issue title

264 - Machines lack appropriate safety guards (e.g. eye or needle guards on sewing machines, belt/hand guards on other machines)

## Verification method

Desktop audit

## Description

During to site tour, management interview, worker interview found 5 of 60 sewing machine employees do not use eye protection equipment.

## Area of non-compliance/non-conformance

Base code

## Corrective and preventative actions

facility will provide the eye guard for all machine

## Evidence



[nc.jpeg](#)



\* PDF generated at 12:34 (UTC) on 14 Jan 2026. [View this finding on the Sedex platform](#) for live updates and closure details.

[← Code area 3](#)

[Code area 4 →](#)

### 3. Working conditions are safe and hygienic

## Data points

Is someone within the company responsible for health and safety?	Yes, qualified safety officer
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	Yes  The workers are well trained on access and handle the hazardous substances (e.g. chemicals or pesticides).
Who organises accommodation for workers?	Workers independently arrange their own accommodation
Who organises worker transportation between accommodation and worksite?	Other third party contracted by the site
Who organises worker transportation while at work?	Other third party contracted by the site
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	No  There is no any additional buildings.
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No

[← Code area 3](#)

[Code area 4 →](#)

Does the site have a structural engineer evaluation?    Yes

## 4. Child labour shall not be used

### Management systems

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

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

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

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

## Management systems

### Explanation for management systems grades

Child labour Policy:

Grading: Robust Management System

- The factory has a clear, written policy that strictly prohibits the use of child labor. This policy follows all local and international laws and standards on minimum working age.
- The factory has a reliable process to verify the age of all workers during hiring. This includes checking official documents like birth certificates, national IDs, or passports to ensure that no children are hired.
- The Remediation plan established by facility to immediate removal of the child from work, establishing a committee (management, union, NGOs, government) to investigate root causes, and developing a multi-faceted solution: providing financial support (like stipends or adult family employment), ensuring education (school fees, materials), offering vocational training, guaranteeing safe housing/reunification, and implementing long-term monitoring to prevent recurrence. It was checked by auditor during the audit and found implemented effectively
- Checked there is no child labor policy, It is communicated to all workers, and supervisors.

Responsible person:

Grading: Robust Management System

- Mr. Ahmed Shaker OHSE Manager were assign to responsible to implement this area of code.

Training:

Grading: Robust Management System

- Regular training is provided for all staff involved in hiring and management on the importance of preventing child labor, understanding legal requirements, and recognizing fake documents.

Monitoring and Auditing:

Grading: Robust Management System

- Facility implement internal audit on "Child labor and remediation plan implementation, and did Internal Audit dated 04/06/2025 on all social Procedures.

## Summary of findings

[← Code area 3](#)

[Code area 5 →](#)

Code area	Workplace requirement	Area of NC	Finding
	No findings		
<b>Systems and evidence examined to validate this code section</b>	<p>1. The company does not hire or involved in any kind of child labor. No evidence of child or young-looking workers during the factory tour.</p> <p>2. Employment procedure commitment that the facility would never employ and use child labor under the minimum legal age (15 years old). All workers are hired directly, age verification was conducted during the personal files review.</p> <p>3. The minimum Age detected at site was 18 Years, YOH was 2024 and YOB was 2006.</p> <p>4. There is no young workers at place.</p> <p>5. Training for Recruitment Staff were applied on a frequent bases, as well as internal audit against the code was carried out.</p> <p>6. The facility establish the Remediation Plan of Child Labor.</p> <p>The following evidence were examined:</p> <ul style="list-style-type: none"> <li>•Management interview.</li> <li>•Workers interviews.</li> <li>•Documents and records were checked as follows: <ul style="list-style-type: none"> <li>- Personal files for all workers.</li> <li>- Copies of birthday certificates for workers.</li> <li>- Recent photos.</li> <li>- Criminal Records.</li> <li>- Educational Background records.</li> </ul> </li> </ul>		

#### 4. Child labour shall not be used

## Data points

Percentage of workers that are age 24 or younger	24%
Enter the legal age of employment	15
Enter the age of the youngest worker identified	19
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0.0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	Not Applicable

[← 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	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended



## Management systems

### Explanation for management systems grades

Legal wages Policy:

Grading: Robust Management System

-The factory has a clear policy stating that all workers must be paid at least the legal minimum wage or higher. The facility was calculating the minimum living wage which need to establish by facility. This existing policy is communicated to all workers and management to ensure everyone understands wage entitlements. Checked Company policy and procedures last issued 01/01/2025.

Responsible person:

Grading: Robust Management System

- Mr. Mohamed Mahmoud (HR Advisor) was assign to responsible to implement this area of code.

Training:

Grading: Robust Management System

- Workers are trained on working hours at the beginning stages of the employment and also if any changes is introduced by law or internal policies.

Monitoring and Auditing:

Grading: Some Improvement Recommended

- Facility implement internal audit on "wages and benefits", and did Internal Audit dated 4/06/2025 on all social Procedures.

Area of improvement found that the deduction has been carried out for the Absentees of 2 workers of 45 samples checked in November 2025 record

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
5. Legal wages are paid	5.D Ensure no deduction from workers pay is f...	Base code	NC <a href="#">ZAF601267309</a>

[← Code area 4](#)

[Code area 5.A →](#)

## Systems and evidence examined to validate this code section

1. Sample of 45 workers were checked for months were checked are
  - Feb 2025 (last paid month)
  - JUN 2025 (random month).
  - Nov 2025 (last paid month)

No working was noted on Fridays. The organization respects the wages and benefits regulations and rules.
2. The facility pays sick leave, maternity leave and annual leave.
3. Procedure and policy are indicated that the site paid for overtime premiums as per the legal requirements as the following:
  - a. 135% of workers basic wages to workers for their day light hour's overtime work.
  - b. 170% of workers basic wages to workers for their night hour's overtime work.
  - c. 200% of workers basic wages to workers for their weekly day off overtime work.
  - d. 200% of workers basic wages to workers for their holidays overtime work.
4. Workers basic wages were paid based on the local minimum wage standard of 6000 EGP/month till 31/05/2024 and identified to be 6000 EGP starting from 01/06/2024.
  - The facility (actual) apply as follows:
    - 135 % for the summer months ( May- Sept)
    - 170 % for the winter months (October to April)
    - 200 % for Weekend
    - 300 % For the official vacation

for the 26 sample checked; that are ok and no any violation against overtime provided to workers
5. All workers were provided with written and understandable information about their work condition in respect to wages before they entered to the work and about the particulars of their wages for the pay period concerned every time that they were paid.
6. It was evident during the documents review that there is no illegal or unauthorized deductions were observed.
 

The following evidences were examined:

  - Employment procedure
  - Management interview.
  - Workers interviews.
  - Documents and records were checked as follows:
    - o Personal files for all workers.
    - o Copies of birthday certificates for workers.
    - o Recent photos.
    - o Criminal Records.
    - o Educational Background records.

it was observed that the deduction has been carried out for the Absentees of 2 workers of 45 samples checked in November 2025 record

# Findings: non-compliances

ZAF601267309

Non-compliance

Due 2026-03-15

<b>Code area</b> 5 Legal wages are paid	<b>Status</b> Open*
<b>Workplace requirement</b> 5.D Ensure no deduction from workers pay is for disciplinary sanctions. Ensure deductions not provided for by national laws are legal, and do not take workers below the legal minimum wage. Ensure workers are provided with information to understand any wage deductions and provide their authorisation.	<b>Time given to resolve</b> 60 days
<b>Issue title</b> 414 - Pay deducted for disciplinary measures (e.g. lateness, absenteeism, disciplinary warnings, errors in production, etc.) - isolated	<b>Verification method</b> Desktop audit
<b>Description</b> During worker interview, documents check, HR manager it was observed that the deduction has been carried out for the Absentees of 2 workers of 45 samples checked in November 2025 record	<b>Area of non-compliance/non-conformance</b> Base code
<b>Corrective and preventative actions</b> facility will maintain the system for pay roll for all employee	

\* PDF generated at 12:34 (UTC) on 14 Jan 2026. [View this finding on the Sedex platform](#) for live updates and closure details.

## 5. Legal wages are paid

### Data points

What is the basic wage paid to workers?	Wages are based on job skills and experience The legal minimum wage
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Mix of digital and other payment methods (give details)  It was confirmed during the management interview, documentation review, and workers interview; There is 20 % of workers are paid Cash and 80 % through bank Transfer (QNB).
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	None

### Worker remuneration

Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers?	Health care
--	-------------

### Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Not available
Is actual wage data available on site for any of these options?	Monthly

Maximum legal working hours	Max hours per day	8.0
	Max hours per week	48.0
	Max hours per month	Non applicable
Actual required working hours	Required hours per day	8.0
	Required hours per week	48.0
	Required hours per month	208.0
Maximum legal overtime hours	Max hours per day	2.0
	Max hours per week	12.0
	Max hours per month	Non applicable
Actual overtime hours	Max hours per day	2.0
	Max hours per week	6.0
	Max hours per month	20.0
Minimum legal wage	Min per hour	28.0
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	7000.0
Actual minimum wage	Actual per hour	Non applicable
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	7000.0

Minimum legal overtime wage	Min per hour	1.35
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum overtime wage	Actual per hour	1.35
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	Non applicable

## Wage analysis

Number of workers' records checked	126
Provide the date and details of the records	<p>42 personnel records were checked, covering the following months</p> <ul style="list-style-type: none"> <li>- February 2025 (random month), average overtime is 2 hours/day, 6 hours/week, 20 hours/month.</li> <li>- June 2025 (random month), average overtime is 2 hours/day, 8 hours/week, 24 hours/month.</li> <li>- November 2025 (Last paid months), average overtime is 2 hours/day, 4 hours/week, 14 hours/month.</li> </ul>
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?	Meets legal minimum
Indicate the breakdown of workforce per earnings	The minimum wage identified by law is Gross (7000 EGP) to be effective since 01/03/2025, the facility was comply with this regulation and found applied effectively

[← Code area 5](#)

[Code area 5.A →](#)

Are there any bonus schemes used? No

Were accurate records shown at the first request? Yes

Were any inconsistencies found? No

## 5.A. Living wages are paid

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>The facility used The Anker Methodology for Estimating a Living Wage</p> <p>42 Sample of months were checked are February 2025 (last paid month) June 2025 (random month). November 2025 (last paid month)</p> <p>The factory calculated the minimum living wage with total 8,500 EGP and has the plan to achieve by end of year 2027.</p> <p>The company calculated the month from 26 of previous month to 25 of existing month and salary paid maximum on 1st day of next month through bank transfer 100% of workers.</p> <p>The company calculated the month from 01 of previous month to 30 of existing month and salary paid maximum on 5th day of next month through bank transfer or cash.</p> <p>The following evidences were examined:</p> <ol style="list-style-type: none"> <li>1. Employment procedure was reviewed.</li> <li>2. The facility complies with legal requirements for wages and benefits, the following documents &amp; records were checked. <ul style="list-style-type: none"> <li>• Payrolls Records.</li> <li>• Deduction records.</li> <li>• Attendees records.</li> <li>• Incentive records.</li> </ul> </li> </ol>		



## 6. Working hours are not excessive

### Management systems

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

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

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

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

## Management systems

### Explanation for management systems grades

Working Hour Policy:  
Grading: Robust Management System  
- The factory has a policy that defines standard working hours, overtime limits, rest periods, and breaks in line with legal requirements following Egyptian local law 14/2025 and published at factory boards. Checked Company policy and procedures last issued 01/01/2025.

Responsible person:  
Grading: Robust Management System  
- Hamdy Hemly – HR Manager was assigning to responsible to implement this area of code.

Training:  
Grading: Robust Management System  
- Workers are trained on working hours at the beginning stages of the employment and also if any changes is introduced by law or internal policies. Induction training was provided

Monitoring and Auditing:  
Grading: Robust Management System  
- Facility implement internal audit on "Working hours", and did Internal Audit dated 04/06/2025 on all social Procedures .

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

## Systems and evidence examined to validate this code section

1.The organization has written policies and procedures which define the ETI requirements and requirements, and address wages and benefits practices, and legal limits of the working hours.

It was observed during the Audit that the Facility has a One shift for all company processes and acting as following :

The facility working hour from 08:00 Am to 4:30 PM (8.5 hours) 0.5 hour break.

2.One day off (Friday) for all company employees.

3.Finger print used for attendance by all workers.

4.All sampled workers take rest 1 day per week and work a 6 days / week based on Egyptians labour law.

5.All the workers are hired directly to the facility and there are no agency workers in the facility.

6.It was evident during the workers interview and documents review that the overtime is rare and it is voluntarily; information from worker interviews coincides with time and payroll records. The sampled workers stated that they have worked 2 overtime hours per day due to the urgent business needs (Shipments) and it was confirmed during the time records review .

7.During this audit the time records and payrolls review for the sampled workers in Feb 2025 (last paid month)

JUN 2025 (random month).

Nov 2025 (last paid month) 45 records were checked.

8.Overtime is voluntary according to the workers interviews.

9.It was evident during the documents and records review and worker interviews that overtime is worked only occasionally and is never excessive.

10. Working hours do not exceed 48 hours per week, according to the Labor Law, It was observed there are 2 workers out of 45 sample taken are worked more than 60 hours during November 2025 at Dyeing/ washing section. As well as those sample of workers detected was worked 3 hours overtime per day instead of 2 hours.

The following evidences were examined:

1. Employment procedure was reviewed.

2. Documents and records review included attended sheet and production records were checked.

3. Attended time records for payrolls records were reviewed during the audit.

4. Workers interview.

Sample of months were checked are

Feb 2025 (last paid month)

JUN 2025 (random month).

Nov 2025 (last paid month) .

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## 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?	<p>Procedure and policy are indicated that the site paid for overtime premiums as per the legal requirements as the following:</p> <p>Law 12/2003</p> <ul style="list-style-type: none"> <li>a. 135% of workers basic wages to workers for their day light hour's overtime work.</li> <li>b. 170% of workers basic wages to workers for their night hour's overtime work.</li> <li>c. 100% of workers basic wages to workers for their weekly day off overtime work or day off at next week.</li> <li>d. 200% of workers basic wages to workers for their holidays overtime work.</li> </ul> <p>law 14/2025</p> <ul style="list-style-type: none"> <li>a. 135% of workers basic wages to workers for their day light hour's overtime work.</li> <li>b. 170% of workers basic wages to workers for their night hour's overtime work.</li> <li>c. 200% of workers basic wages to workers for their weekly day off overtime work.</li> <li>d. 300% of workers basic wages to workers for their holidays overtime work.</li> </ul>
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?	54.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	60.0

[← Code area 6](#)

[Code area 7 →](#)

Maximum number of days worked  
without a day off in sample 6

## 7. No discrimination is practiced

### Management systems

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

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

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

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

Management systems

Explanation for management systems grades

- Anti-Discrimination Policy:  
Grading: Robust Management System
- The factory has a written policy of Non Discrimination, that strictly prohibits all forms of discrimination based on race, gender, age, religion disability, sexual orientation, or any other personal characteristic. This policy is shared with all workers and management
- Responsible person:  
Grading: Robust Management System
- Mr. Ahmed Shaker HSE Manager was the person assign by the facility to responsible for implementing procedures of no discrimination.
- Training on Diversity and Inclusion:  
Grading: Robust Management System
- All workers, supervisors, and managers receive regular training on diversity, inclusion, and anti-discrimination. This training helps everyone understand and respect differences and recognize and prevent discriminatory behavior. Facility also provided grievance training which includes the reporting process if anyone felt discriminated. Training records as sample was checked.
- Monitoring and Auditing:  
Grading: Robust Management System
- Facility implements internal audit on "Discriminatory practices and Grievance procedure", and did Internal Audit dated 04/06/2025 on all social Procedures.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			



## Systems and evidence examined to validate this code section

1. It was noted during the interview with the management and workers and documents review that there was no discrimination on hiring, compensation, promotion, termination or retirement and access to training.
2. The facility provided the same payment for workers from the same category and experience.
3. The facility Communicate all policies and procedure by posting at visible places. As well as the facility train employees and other workers, including managers and supervisors, on relevant policies and procedures.

The following evidences were examined:

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

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)?	40%
Representation of women in managerial roles (ratio of women workers to women managers)	0%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	2%
Three most common nationalities in managerial and supervisory roles	Egyptian only

## 8. Regular employment is provided

### Management systems

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

## Management systems

### Explanation for management systems grades

Policies and procedures:

Grading: Robust Management System

- As per policy the factory provides all workers with clear, written contracts that outline the terms of regular employment. These contracts specify job roles, duties, wages, working hours, and the length of employment. Checked Company policy and procedures last issued 01/01/2025

Responsible person:

Grading: Robust Management System

- The facility assign (Mr. Hamdy Helmy – HR Manager) to be responsible of implementing Regular employment code.

Training and Development:

Grading: Some Improvement Recommended

- The factory provide training on Regular employment which covers the development opportunities to regular employees to support their career growth and skills enhancement. Induction training was provided for all workers.

Monitoring and Auditing:

Grading: Some Improvement Recommended

- Facility implements internal audit on "Regular Employment", and did Internal Audit dated 18/08/2024 on all social Procedures .

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
8. Regular employment is provided	8.A Provide a written contract or other bindi...	Local law Base code	NC <a href="#">ZAF601267308</a>

[← Code area 7](#)

[Code area 8.A →](#)

## Systems and evidence examined to validate this code section

1. Work performed was on the basis of recognized work relationship established through national law and practice. All workers signed the labour contracts with the facility upon their hiring (on the first day of work). The employment contract was checked and found as per policy, Job Security and Continuity. However It was observed during the documentation review, worker interview, and management interview.
  2. As for the current audit, it is found that the company comply with applicable requirements of labour law 12/2003 and ETI.
    - o All workers are hired direct by the company.
    - o All workers signed contract with the company.
    - o All workers are covered by the social insurance.
    - o No migrant workers.
    - o All workers are Egyptian.
    - o No home workers.
    - o No man power agent used.
    - o No subcontractor used.
    - o No outsourcing for any processes.
- The following evidences were examined:
1. HR Policy and procedure were reviewed.
  2. Management interview.
  3. Workers interviews.
  4. Documents and records were reviewed as following:
    - a. Payroll records were reviewed.
    - b. Based on the labour contract, all the workers are covered with social insurance
    - c. Labour contracts are matching with the legal requirements were reviewed.
- It was found that the working contracts were not updated to the new local law #14/2025.

# Findings: non-compliances

ZAF601267308

Non-compliance

Due 2026-02-13

<b>Code area</b>	<b>Status</b>
8 Regular employment is provided	Open*
<b>Workplace requirement</b>	<b>Time given to resolve</b>
8.A Provide a written contract or other binding agreement that specifies the terms and conditions of employment, that meet all legal requirements, in a language workers can understand.	30 days
<b>Issue title</b>	<b>Verification method</b>
525 - Inadequate contracts in place, i.e. missing critical elements such as job description, wages (regular and overtime), hours of work (including overtime), notice period etc.	Desktop audit
<b>Description</b>	<b>Area of non-compliance/non-conformance</b>
During the documents review, HR manager interview, and worker interview, It was found that the working contracts were not updated to the new local law #14/2025.	Local law
	Base code
<b>Corrective and preventative actions</b>	
The company must provide an updated contract according to the new law #14/2025, and ensure that all workers receive the new update of the working contract.	
<b>Local law reference</b>	
Egyptian Labour law was changed to law #14/2025, on September 2025.	

\* PDF generated at 12:34 (UTC) on 14 Jan 2026. [View this finding on the Sedex platform](#) for live updates and closure details.

8. Regular employment is provided

Data points

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

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

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>Policies on Sub-Contracting and Homeworkers: Grading: Robust Management System</p> <ul style="list-style-type: none"> <li>• There is a Sub-contractor of Construction activities (Painting)</li> </ul> <p>Responsible person: Grading: Robust Management System</p> <ul style="list-style-type: none"> <li>• Facility nominated. The facility assigns Mr. Hamdy Helmy – HR Manager as responsible to monitor the sub contract facilities to ensure compliance with legal standards and ethical practices (if any).</li> </ul> <p>Training and Support: Grading: Robust Management System</p> <ul style="list-style-type: none"> <li>• The factory provides training and support to sub-contractors on the working procedure but not on relevant standards, including safety practices, fair wages, and workers' rights verbally. There was no record found during the audit day.</li> </ul> <p>Monitoring and Auditing: Grading: Robust Management System</p> <ul style="list-style-type: none"> <li>• Facility conducted internal audit dated 04/06/2025</li> </ul>

[← Code area 8](#)

[Code area 9 →](#)



## 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>There were 1 outside processes or subcontracting' for this section. Especially for factory check if any processes are missing, if any partially finished goods are in goods out/in.</p> <p>There is subcontractor policy at place, was identified Company Policies, and keep the Responsible person for Mr. Hamdy Helmy (HR )</p> <p>Training for Recruitment Staff were applied on a frequent bases, as well as internal audit against the code was carried out.</p> <p>The following evidences were examined:</p> <ul style="list-style-type: none"> <li>-Production records.</li> <li>-Production capacity plan records.</li> <li>-Attendance records.</li> <li>-Shipment records.</li> </ul>		

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	-	-	-	-
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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

There is no any subcontractor at place.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity?

Yes

The facility has a contractor of Construction activities (Painting)

Are any sub-contractors used?	Yes	
Sub-contractor 1	Processes subcontracted	Construction / Painting Activity
	Name of factory	Masar for Installment and construction Company.
	Address	Buidling # 3, 5 th Alsayed Mohamed Essa street , Helioplies, Nasr City, Egypt
	Dates used	01/10/2024.

# 9. No harsh or inhumane treatment is allowed

## Management systems

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

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

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

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

## Management systems

### Explanation for management systems grades

- Anti-Harsh Treatment Policy:  
 Grading: Robust Management System
 
  - The factory has not established a written policy that explicitly prohibits any form of harsh or inhumane treatment, including physical abuse, verbal abuse, harassment, or intimidation.
- Responsible Person:  
 Grading: Robust Management System
 
  - The factory has nominated Mr. Ahmed Shaker OHSE Manager as responsible to implement the procedure and policy, Promoting Respectful Behavior, Effective Investigation and Resolution
- Training and Awareness:  
 Grading: Robust Management System
 
  - All workers, supervisors, and managers receive regular training on what constitutes harsh or inhumane treatment and how to prevent it and recorded at training that carried out. This training includes information on respectful behavior, appropriate disciplinary methods, and how to report any incidents of mistreatment.
- Regular Monitoring and Audits:  
 Grading: Robust Management System
 
  - The factory Managing Director himself regularly monitors and audits workplace practices to ensure that harsh or inhumane treatment does not occur. All the representatives work under his supervision to mitigate these issues., and did Internal Audit dated 04/06/2025 on all social Procedures.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

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

1. The facility was not has written anti-harsh or inhumane treatment policy. while the facility declared that the physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is prohibited.
  2. There is no physical abuse or discipline in the facility and the discipline procedure of the facility was verbal warning and deduction as per the management and workers' interviews.
  3. The training records on Grievances mechanism policy was checked records
  5. Training for Recruitment Staff were applied on a frequent bases, as well as internal audit against the code was carried out.
- The following evidence were examined:
1. Management interview.
  2. Workers interviews.
  3. training records.

## 9. No harsh or inhumane treatment is allowed

### Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?	Yes, there is a formal grievance process
	The grievance process is available to all workers
	The grievance process is available to members of the local community
What type of grievance mechanism(s) are available?	<p>The facility applies as follows:</p> <ul style="list-style-type: none"> <li>- open door policy,</li> <li>- Complaint box.</li> <li>- worker representative.</li> </ul> <p>only one complaint was raised against the cold water.</p>
Number of grievances raised in the last 12 months	2
Number of grievances resolved in the last 12 months	2

# 10.A. Environment 2–Pillar

## Management systems

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



Management systems

Explanation for management systems grades

- Environmental Policy and procedures:  
Grading: Robust Management System  
The factory has a written Company policy and procedures last issued 01/01/2025 and procedure as the facility certified for ISO 14001:2015 to reduce environmental impact, including waste management, energy use, and emissions control.
- Regulatory Compliance:  
The factory follows all environmental laws and regulations, including permits and reporting requirements.
- Responsible Person:  
Grading: Robust Management System  
Mr. Hamdy Helmy – HR Manager is the Responsible person to implement the policies and procedure of Environmental management system.
- Employee Training:  
Grading: Robust Management System  
Workers are trained on environmental practices and their role in minimizing environmental impact, sample of training records checked.
- Regular Monitoring:  
Grading: Robust Management System  
The factory regularly monitors its environmental impact and performance, including emissions and waste through daily checklist and internal audit, and did Internal Audit dated 04/06/2025 on all social Procedures.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

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

The section was covered at B Environment 4 Pillar,  
The following evidences were examined during the audit

- The facility was aware of about the local law, original and national laws , rules and regulation regarding to environment , they also have the valid environment permit

-The facility has wastage agreement with the 3rd party wastage collector

-ISO 9001:2015 ,ISO14001:2015, and ISO 45001:2018 certificates.

-Legal approvals.

-Waste management contracts/records.

Facility has environmental registration file contains all aspects and impacts, environmental measurements including noise measures, air emission, GHG, Files prepared by Green Egypt, dated 1/8/2025.

Wastewater test water 4/11/2025 .

-Environmental aspects monitoring report.

-Facility tour

- environmental measurements report

- training record

-EMS procedure

## 10.A. Environment 2-Pillar

### Data points

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

No

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

The facility is certified for ISO 14001:2015.

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		
Systems and evidence examined to validate this code section	<p>The facility is managing the site activities according environmental management system of ISO14001:2015.</p> <ul style="list-style-type: none"> <li>•The site established an updated environmental policy in the Company policy and procedures last issued 01/01/2025. that covers its environmental impact and is communicated to all suppliers and customers.</li> <li>•The site measured the impacts and these effects are mentioned in the latest environmental impact report</li> <li>•The environmental policy includes a site committee to ensure continuous improvements in its environmental performance.</li> <li>•The site has established and maintained an environmental management system.</li> <li>•Hazard identification, risk assessment and control was established and updated on 1/1/2025.</li> <li>•Last water analysis and industrial water analysis reports were carried out in 01/01/2025,</li> <li>•All types of waste are disposed to legally approved waste disposal agents.</li> <li>•Mr. Ahmed Shaker OHE Manager is the Responsible person to implement the policies and procedure of Environmental management system</li> <li>•Training for Recruitment Staff were applied on a frequent bases, as well as internal audit against the code was carried out, the training was carried out by HR manager</li> </ul> <p>The following evidence were checked:</p> <ul style="list-style-type: none"> <li>-Legal approvals.</li> <li>- Environmental measurements report</li> <li>-Waste management contracts/records.</li> <li>-Environmental aspects monitoring report.</li> <li>-Facility tour.</li> <li>- Environmental Responsible manger</li> <li>- Reduction target plan to improve environmental aspects</li> <li>- Chemical M S based on client's requirements</li> </ul>		

[← 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?	Other (provide details)  There is no any other sustainable policies at place.
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes  Chemical management system, which cover the basic Client's requirements and legislation in the destination countries regarding environmental and chemical issues
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))?	No
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

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

[← Code area 10.B](#)

[Code area 10.C →](#)

Total electricity consumption from non-renewable sources (kWh)	1,320,844	120,000
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)	336,865	10,000
Usage of other purchased fuels	local authority	local authority
Has the site completed any carbon footprint analysis?	No	No
Water sources	Local Authority	Local Authority
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	20,841	18,000
Water discharged	Local Authority	Local Authority
Water volume discharged (m3)	17,000	15,000
Water volume recycled (m3)	0	0
Total waste produced (mt)	120,000	1,100,000
Total hazardous waste produced (mt)	27,500	25,000

[← Code area 10.B](#)

[Code area 10.C →](#)

Waste to recycling (mt)	0	0
Waste to landfill (mt)	27,500	25,000
Waste to other (mt)	92,500	109,750,000
Total product produced (mt)	345,207.5	314,255

# 10.C. Business ethics

## 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

[← Code area 10.B](#)



## Management systems

### Explanation for management systems grades

Business ethics Policy  
Grading: Robust Management System  
- The facility established business ethics as in Company policy and procedures last issued 01/01/2025 including anti bribery and corruption policy.

Responsible Person:  
Grading: Robust Management System  
Appoint a manage  
- Mr. Ahmed Shaker OHSE Manager was the designated person responsible for implementing standards concerning Business Ethics, and that site practices were conducted without any corruption and/or bribery.

Training:  
Grading: Robust Management System  
- The training records was checked for all company employees about Business Ethics.  
- Grievance mechanism communicated to relevant external parties as the facility implement the following Grievance mechanism (open door policy, Compliant box, worker Representative)  
- Training for Recruitment Staff were applied on a frequent bases, as well as internal audit against the code was carried out, the training was carried out by Mr. Hamdy Helmy – HR Manager.

Monitor the effectiveness of procedure:  
Grading: Robust Management System  
- Effective implementation at place, as facility conduct internal audit on annual bases with regular monthly meeting through union representative, and did Internal Audit dated 04/06/2025 on all social Procedures.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

[← Code area 10.B](#)

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

- The facility established business ethics policy as Company policy and procedures last issued 01/01/2025, including
  - Anti Bribery
  - Anti-Corruption
  - Trust and transparency policy
- The training records was checked for all company employees about antibribery and ani corruptions policy.
- Grievance mechanism communicated to relevant external parties as the facility implement the following Grievance mechanism (open door policy, Compliant box, worker representative)
- Training for Recruitment Staff were applied on a frequent bases, as well as internal audit against the code was carried out , the training was carried out by HR manager

It was confirmed form management interview, documentation review and worker interview the followings:

- The facility understanding of current and relevant legislation relating to bribery, corruption, unethical, or any type of fraudulent or unethical business practices.
- There is awareness of, and compliance with, any fiscal legislative requirements, where required. This may include 3rd party financial audits.
- High level of communicate a business ethics policy covering bribery, corruption, or any type of fraudulent or unethical business practice to all parties it deems as high risk, including the site's own suppliers.
- Effective Implement appropriate and effective corrective actions where they have been subject to any fines/prosecutions for non-compliance to business ethics, regulations or equivalent.

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	There is no certificate at place.

[← Code area 10.C](#)

Attachments



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